

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

Pacific Gas and Electric Company, for authority to decrease its rate and charges for electric and gas service and increase rates and charges for pipeline expansion service-test year 1996 general rate case consolidated with I9502015.

A.94-12-005
(Filed: December 9, 1994)

Commission Order Instituting Investigation into rates, charges, service and practices of PG&E; consolidates with A9412005; authority applies to A9212043 et al.

I.95-02-015
(Filed: February 22, 1995)

Commission Order Instituting Rulemaking, to develop standards for electric system reliability and safety pursuant to D96-09-073. Consolidated with I95-02-015

R.96-11-004
(Filed: November 6, 1996)

PUBLIC VERSION

**PACIFIC GAS AND ELECTRIC COMPANY'S
ANNUAL REPORT ON COMPLIANCE
WITH GENERAL ORDER 166
COMPLIANCE PERIOD: JULY 1, 2018 TO JUNE 30, 2019**

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Dated: October 31, 2019

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WITH GENERAL ORDER 166
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Pursuant to General Order 166, Standard 11, Pacific Gas and Electric Company (PG&E) hereby submits its annual report on compliance with General Order 166 for the period July 1, 2018 through June 30, 2019 (Compliance Period). This report documents PG&E's compliance with each of the thirteen standards of the General Order.

Standard 1. Emergency Response Plan

Standard One requires PG&E to prepare an emergency response plan and update the plan annually. The 2018 PG&E Emergency Response Plan (Plan) consists of the following four individual plans that pertain to the General Order:

1. Company Emergency Response Plan (CERP) (Exhibit A)
2. Electric Annex (Exhibit B)¹
3. Wildfire Safety Plan (Exhibit B) which was filed with the CPUC on 2/6/2019
4. Emergency Communications Plan (Summary in Exhibit C)

¹ PG&E's Electric Emergency Plan (EEP) for Capacity Emergencies are included as an appendix to the Electric Annex. The EEP is also filed separately with the CPUC.

The Plan covers each of the ten required elements specified in Standard One. Attached as Exhibit D is a table identifying the ten elements and where each element is found within the CERP, the Electric Annex, the Wildfire Safety Plan, and the Emergency Communications Plan.

PG&E reviewed each of the three individual plans during the Compliance Period, and made updates, as appropriate. A description of the updates is attached as Exhibit E.

Standard 2. Mutual Assistance Agreements

Standard Two requires PG&E to negotiate mutual assistance agreements with other utilities. PG&E has maintained the same mutual assistance agreements with the California Utilities Emergency Association (CUEA) and the Western Region Mutual Assistance Group (WRMA). In addition, PG&E continues to maintain mutual assistance agreements with Trinity County Public Utilities District (TCPUD), Florida Power and Light (FPL), and Puerto Rico Electric Power Authority (PREPA). The agreements incorporate the items listed in Standard Two. These agreements will be provided to the CPUC's staff in accordance with Standard Two.

During the Compliance Period, PG&E used both the CUEA mutual assistance agreement and the Western Regional Mutual Assistance Agreement (WRMAA) to access additional resources in response to emergencies. In July of 2018, PG&E provided mutual assistance in response to Redding Electric Utility's request for overhead distribution and transmission crews. PG&E deployed electric crews, equipment and vehicles to support emergency response to the Carr Fire in Redding, California. In August of 2018, PG&E requested mutual assistance resources to respond to the Carr Mendocino Complex Wildfire in its service territory. Mutual assistance electric crews were received from four utilities from the state of California and party to the CUEA and four utilities from the state of Washington under the WRMAA. In October to November of 2018, PG&E requested mutual assistance to respond to the Camp Fire. PG&E received mutual assistance from eighteen utilities from eleven states and Canada to access electric distribution and transmission crews, vegetation management services, and unmanned aerial vehicle planning capability. In February 2019, PG&E requested mutual assistance for winter storm response and one utility under the CUEA provided electric crew resources.

Standard 3. Emergency Training and Exercises

Standard Three requires PG&E to conduct annual emergency training and exercises using PG&E's Company Emergency Response Plan and to evaluate its response to an exercise or incident. PG&E complied with this standard by submitting information about their company exercise "August Public Safety Power Shutoff Full-scale Exercise", which took place August 27-31, 2018.

Tier three portions of the fire index areas were simulated as being near an extreme plus weather forecast. Several emergency centers were activated including the Emergency Operations Center, the Fresno Operations Emergency Center, Los Padres Operations Emergency Center, the Wildfire Safety Operations Center, the Electric Transmission Emergency Center, the Substation Transmission Operations Emergency Center, the Vacaville Grid Control Center, the Southern Distribution Control Center, the Human Resources Coordination Center, and the Information Technology Coordination Center. Customer impacts for the exercise were simulated and included customers impacted by simulated high wind conditions as well as the power shut off. The exercise focused on the following objectives:

- Evaluate how to most efficiently return service to normal prior to the PSPS event, identify any alternative switching solutions and develop a restoration plan that prioritizes critical and essential customers
- Ensure adequate infrastructure remains in or is put in place to facilitate operational communications in the PSPS FIAs
- Evaluate PG&E's ability to effectively identify critical infrastructure tied to Tier 3 distribution and transmission lines as well as to identify customers, including critical and essential, medical baseline and commercial customers, that will be impacted by a PSPS event
- Work with the Operations Section to determine where basecamps, microsites and/or staging areas will be needed to support patrol and restoration crews and plan a timeline to implement setup based on operational needs. Identify the mutual assistance resources that will be needed to most expeditiously return service to all customers
- Coordinate with all operational lines of business to ensure impacted infrastructure is fully identified and supported as needed with personnel in the field
- Support public and external stakeholder communications consistent with PSPS timelines, and including safety messaging, regarding actions being taken to address fire hazard.

This exercise highlighted that there is still a lot to do to prepare the organization for a PSPS event. Documentation, Data Management, Claims and legal issues, Training, and Communications protocols are among the top areas to be addressed.

Standard Three also requires PG&E to submit an evaluation on its response to an exercise or Major Outage, where that outage serves in lieu of the annual emergency exercise. PG&E's August Public Safety Power Shutoff Full-scale Exercise After Action Summary is included in Exhibit G.

PG&E also met the requirements of Standard Three by conducting several additional training programs to prepare designated personnel for emergencies and major outages. These programs included

web-based and instructor-led Incident Command System (ICS) courses and trainings/exercises at the emergency and coordination center, regional, divisional, and transmission levels. Plan-based web-based training such as the Company Emergency Response Plan Overview (EPRS-9010) are annually updated and reflect the changes that are made to the plan on an annual basis.

PG&E's emergency preparedness training program emphasizes the value of using ICS to set objectives, measure performance, create manageable spans of control, and plan event response. PG&E offered online ICS Fundamentals training (code EPRS-9009), which combines concepts from ICS-100 and ICS-200 in a single web-based training. During the Compliance Period, 495 employees completed the ICS Fundamentals course. In addition, during the Compliance Period:

- 774 people completed a web-based training on PG&E's Company Emergency Response Plan (CERP);
- a combined total of 102 people completed Situation Unit, Advance Planning, Cyber Response for the Emergency Operations Center (EOC), Type II Mobile Command Vehicle Transport, Introduction to Base Camp, Advanced Base Camp, EOC and Gas Emergency Center Logistics, Introduction to Emergency Finance Section, or Orientation to EOC training; and
- the following emergency preparedness and response training sessions were conducted at the regional, divisional, and transmission levels during the Compliance Period:
 - 2019 Wildfire Readiness Kickoff Meetings were held in San Ramon on April 23, 2019, and in Fresno and Redding in May 2019. The purpose of these trainings was to increase awareness of the Community Wildfire Safety Program (CWSP). The topics focused on the strategies and tactics necessary to prepare for the upcoming 2019 wildfire season. State agencies Cal OES and Cal Fire were invited to provide an update on their organization's preparations.
 - July 16, 18, 20, 2018, PG&E held a PSPS Tabletop Exercise to organize PSPS hourly process priorities for testing emergency personnel. Specific areas that were addressed were Customer Communication on July 16, 2018; Operational Readiness including coordination with external partners, resource plan development, mutual assistance, restoration strategy, and field engagement on July 18, 2018, and Operational Resiliency on July 20, 2018. The last day of this

exercise developed objectives for meeting operational resiliency goals.

- PG&E internal public affairs messaging training was provided to employees on February 13, 2019, February 21, 2019, February 22, 2019, February 28, 2019 and March 6, 2019 in different locations in Fresno, San Francisco, and San Ramon.
- Over five weeks in February/March 2019, PG&E System Dispatchers and Hydroelectric operators participated in the Peak Reliability Coordinator Restoration exercises for the Western Electricity Coordinating Council (WECC).
- Over three occasions in May/June 2019, PG&E System Dispatchers and Hydroelectric operators participated in the RC West Reliability Coordinator Restoration exercises for the Western Electricity Coordinating Council (WECC).
- At the electric transmission level, PG&E participated in the California Electric Training Advisory Committee's (CETAC's) training and exercise program. Through this program, 30 PG&E system dispatchers and transmission system operators were trained in emergency operations over a five-week period during April and May of 2019. The training also facilitated coordination between PG&E and other utilities during transmission-level emergencies.
- Additional transmission-level exercises during the compliance period included:
 - three regional transmission restoration exercises (with a combined total of 240 participants)
 - PG&E's Systemwide Restoration Exercise in December 2018, where 100 people participated, including external agencies, such as Sacramento Municipal Utility District (SMUD), Trans Bay Cable (TBC), Modesto Irrigation District (MID), North American Reliability Corporation (NERC), Northern California Power Authority (NCPA), California Department of Water Resources (CDWR), Silicon Valley Power (SVP), and Western Area Power Authority (WAPA); and
 - an annual Electric Emergency Plan (EEP) For Capacity Emergencies exercise on April 3, 2019 with 19 participants, that focused on managing capacity shortages by simulating the implementation of rotating outages.
- On March 23, 2019 and March 27, 2019, PG&E's emergency management specialists held Business Continuity Plan trainings at the Southern and Northern District Distribution Control Centers. Eleven center personnel were trained.

- PG&E held a series of PSPS Restoration Exercises in four service divisions to introduce employees and contractors to key concepts about Public Safety Power Shutoff (PSPS) and how it will be implemented in the geographical area. Several engagements that aimed to provide participants awareness training of PSPS include:
 - On May 13-14, 2019, PG&E held the PSPS Restoration Exercise in Yosemite division for Fire Index Area 320 that gave personnel an introduction to PSPS restoration and how it is implemented. Forty-nine individuals participated in this exercise.
 - On June 12-13, 2019, PG&E held a PSPS exercise in Humboldt County (Humboldt division) for Fire Index Area 154. Thirteen employees participated in this exercise.
 - On June 19-20, 2019, PG&E held the PSPS Restoration Exercise in Santa Rosa (Sonoma division) for Fire Index Area 180. Twenty-one employees participated at this exercise.
 - On June 24-25, 2019, PG&E held a second PSPS Restoration Exercise in Napa (North Bay division) for Fire Index Area 175 which involved eighteen employees learning about PSPS restoration and how it is implemented.

PG&E also met the requirements of Standard Three by participating in exercises that were led by governmental partners. As described below, some external trainings and exercises during the Compliance Period were hosted by local agencies, but included planners and participation from operational area, regional, and state-level entities.

- PG&E participated in various coordination meetings with Cal OES, California Independent System Operator, Cal Fire, and California Public Utilities Commission to work through a broad range of issues from the de-energization process and taking a dry-run through the PG&E/CAISO Public Safety Power Shutoff Playbook to planning direct housing sites.
- PG&E held various three-hour PSPS Workshops with local government agencies which aimed to introduce public safety power shutoff and address questions and

concerns about how it is implemented. These events were coordinated with local government agencies and aimed to reach regional public audiences.

- Throughout the compliance period, PG&E held various PSPS Open House events across its service territory to make available information about the Community Wildfire Safety Program (CWSP) and each of its major initiatives. It provided information directly to the public and offered answers to any questions and concerns brought to the event. These events took place in
- Over five weeks in February/March 2019, PG&E System Dispatchers and Hydroelectric Operators participated in the Peak Reliability Coordinator Restoration exercises for the Western Electricity Coordinating Council (WECC).
- March 8, 2019, PG&E participated at Marin County's FIRE Safe Marin – Firewise Workshop in Novato, California. PG&E's Public Safety Specialists participated providing information fact sheets and discussions about the Community Wildfire Safety Program and the Enhanced Vegetation Management initiative.
- April 30, 2019, PG&E met with Cal Fire, Southern California Edison, and San Diego Gas and Electric to update the Power Line Fire Prevention Guide. The focus of this meeting was equipment identification and inspections. The topics addressed were: Inspections specific to SRA PRC 4292 and 93 CCR Title 14 Sections 1255 & 57; how to handle training fire department inspectors versus doing joint inspections, vs or using contract inspectors; mobile data applications used for inspections; PG&E and SCE bringing hardware to evaluate; and regulation changes that the Board of Forestry is exploring regarding 1255 and 1257.
- May 21, 2019, PG&E worked with Napa County Office of Emergency Services and the Napa Valley Community Organizations Active in Disasters to provide a 5-10-minute presentation on PSPS. The purpose of this event was to provide emergency

response partners with information about how the PSPS would be implemented and ways that local organizations can plan to support local communities during such events.

Standard 4. Communications Strategy

Standard Four requires PG&E to develop a strategy for informing the public and relevant agencies of a Major Outage, as defined by this General Order.

- A. PG&E's strategy for communicating with the media, customers, regulatory agencies, and other governmental organizations is contained in its emergency plans entitled Company Emergency Response Plan (Exhibit A), Electric Annex (Exhibit B), and Emergency Communications Plan (Summary in Exhibit C).
- B. PG&E's coordination and communication strategy with state and local governmental agencies is contained within the Emergency Communications Plan (Summary in Exhibit C) and the Electric Annex (Exhibit B). Also, PG&E makes contact information for state and local government agencies widely available through the use of a website to all PG&E emergency personnel internally. All names and phone numbers of county OES contacts are listed by link in the Electric Annex (Exhibit B), are included in the Emergency Communications Plan (Summary in Exhibit C), and are maintained by PG&E's California External Affairs organization. PG&E also maintains multiple levels of contact information of state and local government partners in its emergency notification system.
- C. For all operational issues, the Grid Control Center is the official point of contact with the CAISO and will notify the CAISO within ten minutes of any transmission-related outages.² PG&E's plan for communicating and coordinating with the CAISO is contained in the Electric Annex (Exhibit B) and the Emergency Communications Plan (Summary in Exhibit C).

Standard 5. Activation Standard

Standard Five requires PG&E to coordinate internal activities during a Major Outage in a timely manner. PG&E's activation levels and the resource management process are set forth in the CERP (Exhibit A) and Electric Annex (Exhibit B).

PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period.

² Pacific Gas and Electric *Transmission Operating Procedures*. (Utility Procedure: TD-1400P-01).

Standard 6. Initial Notification Standard

Standard Six requires PG&E to notify relevant individuals and agencies of a Major Outage or other newsworthy event in a timely manner.

PG&E's initial notification procedures are set forth in the Electric Annex (Exhibit B). PG&E generally treats "newsworthy events" as incidents which fall within the category of Level 3 or greater emergencies where the EOC is activated, as set forth in the CERP (Exhibit A) and Electric Annex (Exhibit B). PG&E notified the Commission and the Warning Center at Cal OES of the following emergency events that met this criteria during the Compliance Period:

- June 23-24, 2018 Heat Event
- July 27-August 14, 2018 Carr Mendocino Complex Wildfire Incident
- October 13-24, 2019 Public Safety Power Shutoff Event
- November 6-8, 2018 Potential Wind Event
- November 8-December 7, 2018 Camp Fire Incident

PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period.

Standard 7. Mutual Assistance Evaluation Standard

Standard Seven requires PG&E to evaluate the need for mutual assistance during a Major Outage, as defined by this General Order. PG&E's mutual assistance standard is set forth in the CERP (Exhibit A) and Electric Annex (Exhibit B).

While PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period, PG&E received mutual assistance during:

- Carr and Mendocino Complex Fires from in July 27-August 14, 2018
- Camp Fire in November 8-December 7, 2018
- Winter Storm Event in February 14, 2019

While PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period, PG&E released contract crews in response to the Carr Fire in Redding, California. On July 29, 2018, PG&E deployed electric crews, equipment and vehicles to support emergency response to the Carr Fire in Redding, California. In August of 2018, PG&E requested mutual assistance resources to respond to the Carr Mendocino Complex Wildfire in its service territory. Mutual assistance electric crews were received from four utilities from the state of California and party to the CUEA and four utilities from the state of Washington under the WRMAA. A total of 216 electric crewmen were obtained through the mutual assistance.

In October to November of 2018, PG&E requested mutual assistance to respond to the Camp Fire. On November 27, 2018, PG&E received 532 electric crewmen, 347 vegetation management inspectors and specialists, and 5 unmanned aerial vehicle planning experts from eighteen utilities from eleven states and Canada.

In February 2019, PG&E requested mutual assistance for winter storm response and one utility from Oregon provided electric crew support for the repair and restoration work.

Exhibit J highlights PG&E's provision as well as use of mutual assistance during the Compliance Period to restore service to PG&E's customers and the customers of other utilities.

Standard 8. Major Outage and Restoration Estimate Communication Standard

Standard Eight requires PG&E to inform the public and relevant public safety agencies of the estimated time for restoring power during a Major Outage. PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period.

Standard 9. Personnel Redeployment Planning Standard

Standard Nine requires PG&E to train additional personnel to assist with emergency activities during a Major Outage, (i.e., assessing damage and performing safety standby activities). PG&E's personnel redeployment plan for performing safety standby activities and assessing damage during a Major Outage is set forth in Section 3 of the Electric Annex (Exhibit B).

During the Compliance Period, PG&E conducted trainings for those who may perform safety standby or damage assessment in lieu of their normal duties. Throughout the Compliance Period:

- Safety standby trainings were conducted for 1,575 non-traditional emergency response employees (such as Meter Readers, Gas Service Representatives, Gas Maintenance and Construction, Gas Transmission and Regulation, Work & Resource Inspectors, Mappers, Estimators, etc.). The training included information on how to: (1) identify hazards in the electric distribution system, (2) standby hazards safely, and (3) maintain safety for the public and themselves until qualified electric personnel arrive at the scene.
- 68 PG&E electric estimators were trained to safely perform rapid emergency field assessments during emergency response situations.

Standard 10. Annual Pre-Event Coordination Standard

Standard 10 requires PG&E to annually coordinate emergency preparations with the appropriate state, county, local agencies, and the CAISO.

PG&E held over 520 meetings with city and county government partners to discuss the initiatives under the Community Wildfire Safety Program (CWSP).

As a member of the CUEA, PG&E met with Cal OES to discuss emergency planning and response issues, as well as to more closely support the respective organizations in a large-scale emergency during this Compliance Period. On June 19, 2019, PG&E's Emergency Preparedness and Response Department has an Emergency Management Liaison posted at the Governor's Office of Emergency Services in Mather, California (during non-disasters) and working in the Cal OES Utilities Operations Center during emergencies. The main goal of this position is to better align PG&E planning and emergency coordination with Cal OES and other state agency organizations.

PG&E also invited state, county and local public agencies in its service territory to participate in the Company's trainings and exercises, as described in Section 6.3.1 of the Electric Annex and in Standard Three of this compliance report.

In addition, during the Compliance Period, PG&E conducted electric safety trainings and workshops for the following public agencies:

- 403 separate First Responder Workshops were held throughout PG&E's service area. The workshops were designed to educate first responders on emergencies involving electric and natural gas utility equipment and services. In the workshops, information was provided on electric and gas utility infrastructure, how to recognize emergency conditions, best practices in handling utility-specific emergencies, the "do's and don'ts" when on the scene of an emergency, and other first responder safe practices. (Refer to Exhibit I for a list of agencies that participated in the First Responder Workshops.)
- On September 8, 2018, PG&E provided emergency preparedness information and safety demonstrations to participating public agencies, non-profit organizations, and to the public at the Day of Preparedness event hosted by the California Governor's Office of Emergency Services (CA OES). On September 20, 2018, PG&E also staffed an information booth along with a mobile command vehicle at CA OES' Open House event. PG&E's objectives at this event included networking with public agencies, coordinating emergency response using such assets, and conducting emergency preparedness outreach with the local community.
- On November 5-7, 2018, PG&E participated at San Francisco's Fleet Week by organizing and staffing various information booths about safety, personal emergency preparedness, public safety at local dams, electric and gas safety, public safety power shutoff and other wildfire safety initiatives. PG&E organized and held safety demonstrations and at the Maritime Administration

portion of this event, PG&E showcased some of its major assets and staffed an information booth to communicate information about the use of such assets during emergency incidents.

- PG&E performed the following CWSP Workshops during the Compliance Period:
 - June 10, 2019 to the representatives of Shasta and Trinity counties
 - June 14, 2019 to the representatives of Santa Clara and San Mateo counties
 - June 18, 2019 to the representatives of Butte and Plumas counties
 - June 20, 2019 to the representatives of Tuolumne county
 - June 21, 2019 to the representatives of Mariposa and Madera counties
 - June 24, 2019 to the representatives of Napa, Solano, and Yolo counties
 - June 26, 2019 to the representatives of Placer and Nevada counties
 - June 28, 2019 to the representatives of San Luis Obispo county
 - July 3, 2019 to the representatives of Santa Barbara county
 - July 9, 2019 to the representatives of El Dorado county
 - July 15, 2019 to the representatives of Lake, Colusa, and Glenn counties
 - July 17, 2019 to the representatives of Amador and Calaveras counties
 - July 24, 2019 to the representatives of Sonoma and Marin counties
 - July 26, 2019 to the representatives of Fresno, Tulare, and Kern counties

To further comply with Standard 10, PG&E confirmed contacts and communication channels, and exchanged emergency planning and response information with public agencies.

Standard 11. Annual Report

Standard 11 requires PG&E to submit an annual report describing compliance with these standards and to report on the number of available repair and maintenance personnel. This document constitutes PG&E's annual report on compliance with General Order 166 for the Compliance Period; a description of all changes to the PG&E Emergency Response Plan is attached as Exhibit E. The number of repair and maintenance personnel in each personnel classification for the Compliance Period is attached as Exhibit H.

Standard 12. Restoration Performance Benchmark for a Measured Event

Standard 12 provides PG&E may be subject to a restoration performance benchmark for measured events. However, PG&E did not experience a Major Outage or measured event, as defined by this General Order, during the Compliance Period.

Standard 13. Call Center Benchmark for a Measured Event

Standard 13 provides PG&E may be subject to a call center performance benchmark for measured events. However, PG&E did not experience a Major Outage or measured event, as defined by this General Order during the Compliance Period.

Respectfully Submitted,

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Dated: October 31, 2019

Attorneys for
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2019 List of PUBLIC Exhibits Provided in Archival Grade DVD

Exhibit A	Company Emergency Response Plan (CERP) <u>(REDACTED)</u>
Exhibit B	Electric Annex <u>(REDACTED)</u>
Exhibit C	Communications Strategy
Exhibit D	Location of Required Elements of Standard 1
Exhibit E	Summary Description of Plan Changes
Exhibit F	Mutual Assistance Agreements
Exhibit G	“August PSPPS Event” Full-scale Exercise After Action Summary
Exhibit H	Electric Repair and Maintenance Report 06-30-18 to 06-30-19
Exhibit I	PG&E First Responder Workshops
Exhibit J	Mutual Assistance Provided and Received