

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

Order Instituting Rulemaking to Update  
Rules for the Safety, Reliability, and  
Resiliency of Electrical Distribution Systems

Rulemaking 24-05-023  
(Filed May 30, 2024)

**CLEAN COALITION REPLY COMMENTS ON ORDER INSTITUTING  
RULEMAKING TO UPDATE RULES FOR THE SAFETY, RELIABILITY, AND  
RESILIENCY OF ELECTRICAL DISTRIBUTION SYSTEMS**

/s/ BEN SCHWARTZ

Ben Schwartz  
Policy Manager  
Clean Coalition  
1800 Garden Street  
Santa Barbara, CA 93101  
Phone: 626-232-7573  
[ben@clean-coalition.org](mailto:ben@clean-coalition.org)

July 23, 2024

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**I. INTRODUCTION**

Pursuant to Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“the Commission”) the Clean Coalition respectfully submits these reply comments in response to the *Order Instituting Rulemaking (“OIR”) to Update Rules for the Safety, Reliability, and Resiliency of Electrical Distribution Systems*, issued at the Commission on June 6, 2024. We urge the Commission to consider resilience as a unique issue and focus on the distribution grid on a more granular level, including on “fast trip outages”.

**II. DESCRIPTION OF PARTY**

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of DER—such as local renewables, demand response, and energy storage—and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

**III. COMMENTS**

**A. Safety and Enforcement Division (“SED”)**

SED notes that the existing General Orders (“GO”) have a focus on transmission infrastructure, without addressing the impact of distribution level infrastructure. They suggest

that the Commission potentially develop a new GO dedicated to distribution infrastructure and resources, to ensure that all electrical facilities are covered under reliability and resilience standards.<sup>1</sup> The Clean Coalition concurs that given the numerous different types of outages California faces and the importance of planning in a transparent manner that holds all parties accountable, it is important to ensure that distribution assets are included. The Commission should determine whether it is appropriate to add distribution standards to the existing GOs or draft a new one. A new GO could have additional standards related to Community Microgrids, remote grid microgrids, as well as considering efforts to underground distribution infrastructure.

### **B. Local Government Sustainable Energy Coalition (“LGSEC”)**

LGSEC makes an important contribution that should be added to the scope of the proceeding in requesting the Commission consider the total impact of a given outage. While some outages may be short in duration, the total effect could be significant in a load pocket or area that is not prepared for the electricity to be turned off. For example, if water distribution requires electricity to pump water, or an outage leaves the local fire stations ill-equipped to coordinate an emergency response, the consequences may be far more significant. Likewise, an outage in palm springs during a triple digit temperature day could make an outage that is just a few hours long potentially deadly, whereas the same outage in a temperate coastal zone would be far more tolerable. Therefore, we support consideration of LGSEC’s questions, “What additional information about the scale and scope consequences of an outage needs to be collected? Should the concept of a “mitigated outage” be adopted, and, if so, how can mitigation best be defined, either singularly or along a spectrum?”<sup>2</sup> It does not take an outage that is significant in scale to have widespread impacts and significant consequences, only the right location and set of circumstances. We know that the temperature is rising, meaning more extreme weather events and potential opportunities for disasters; system planning should reflect those realities.

### **C. Rural County Representatives of California (“RCRC”)**

Like the Clean Coalition, RCRC raises the issues of “fast trip” outages and the concern that some circuits are seeing the number of these outages increase, rather than decrease. They write,

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<sup>1</sup> Opening Comments of SED on OIR, at p. 3.

<sup>2</sup> Opening Comments of LGSEC on OIR, at p. 3.

“While there were dramatic improvements in the number of outages experienced on certain circuits between 2022 and 2023, there were a similar number of circuits that saw a dramatic increase in the number of outages experienced year over year. Clearly, much work remains to be done.”<sup>3</sup> The grid tends to be more difficult to maintain in rural areas, given the sheer amount of territory that needs to be covered and the increased amount of vegetation present as compared to urban areas. Standards should exist to promote accountability, while ensuring that these outages do not become overused as grid infrastructure continues to age. RCRC also astutely raises the issue of coordination in this proceeding, pointing out, “PG&E’s monthly reports on their Enhanced Powerline Safety Settings (EPSS) should be concurrently filed to this proceeding and past reports should also be incorporated into the record. These reports are currently only served to parties of R.18-10-007 and I.15-08-019 (both of which are closed) and are not accessible through any docket.”<sup>4</sup> Since the rules, regulations, and standards are being updated in this proceeding, shaping the record of this proceeding as a central repository for all reliability and resilience-related reports is a must. The Commission should have all pertinent information at its disposal in one place to make the most informed decisions, which requires serving all outage-related information here, in addition to any other proceedings where the reports are normally filed.

#### **D. Distribution infrastructure and equity**

Small Business Utility Advocates (“SBUA”) requests specific questions regarding equity—for residential and non-residential customers—be considered in the context of the distribution grid and reasonable of costs (and cost allocation).<sup>5</sup> This request fits in with the need to look more closely at investments being made on distribution-level resilience and whether more effective alternatives are available. For example, Mussey Grade Road Alliance raises the issue of undergrounding costs, noting that the average cost per customer of undergrounding is projected to rise from \$42,689 in 2023 to \$87,811 in 2025. The result is \$1.18 billion spent in 2023 compared to a projection of \$3.4 billion in 2025.<sup>6</sup> At a certain point, off-grid solutions or other non-wires alternatives are significantly more cost-effective and could slow the upward pressure

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<sup>3</sup> Opening Comments of RCRC of OIR, at p. 2.

<sup>4</sup> *Ibid*, at p. 3.

<sup>5</sup> Opening Comments of SBUA of OIR, at p. 3.

<sup>6</sup> Opening Comments of Mussey Grade Road Alliance, at p. 9.

on rates from undergrounding. One example is Green Mountain Power, in Vermont, which is proposing customer-sited energy storage as a better value-creator and more cost-effective solution than simply focusing on traditional grid hardening.<sup>7</sup> Depending on the geographical location and cost/speed of undergrounding, this may be a solution that the Commission should consider.

#### **E. Cal Advocates**

Like the Clean Coalition, Cal Advocates very clearly raises the need to define resilience as a standalone issue and to create unique metrics to determine what effective resilience looks like. They write, “Resiliency: The proceeding should define resiliency and address the inclusion of resiliency in Commission rules, standards, and guidelines. The Rulemaking should also consider the development of metrics for grid resiliency (e.g., amount of time needed to mitigate the outage, duration of backup generation needed, load capacity and load type).”<sup>8</sup> Resilience needs to be considered separately from reliability; existing metrics for reliability do not capture the resilience of the grid, nor the true impact of an outage on a given population. This is essential for the Commission to note because Cal Advocates also makes it clear that efforts in the Microgrids proceeding (“R. 19-09-009) make coordination with this proceeding important, but that there are very distinct efforts that will go on in both proceedings. Work done in this proceeding will only complement work occurring in R. 19-09-009, but in no way will be duplicative.

#### **IV. CONCLUSION**

The Clean Coalition respectfully submits these reply comments. We urge the Commission to scope resilience as a unique issue and include a focus on the distribution grid.

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Policy Manager  
Clean Coalition  
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Santa Barbara, CA 93101  
Phone: 626-232-7573  
[ben@clean-coalition.org](mailto:ben@clean-coalition.org)

Dated: July 23, 2024

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<sup>7</sup> <https://www.utilitydive.com/news/green-mountain-power-vermont-storage-grid-hardening/696180/>

<sup>8</sup> Opening Comments of Cal Advocates on OIR, at p. 1.