

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



**FILED**

09-08-09

04:59 PM

Application No. 08-12-021  
(Filed December 22, 2008)

Application of SAN DIEGO GAS  
& ELECTRIC COMPANY for  
Review of its Proactive De-  
Energization Measures and  
Approval of Proposed Tariff  
Revisions (U 902-E)

**MUSSEY GRADE ROAD ALLIANCE REPLY COMMENTS REGARDING  
DECISIONS CONCERNING SAN DIEGO GAS AND ELECTRIC'S SHUT  
OFF PLAN AND RULE 14 CHANGE**

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# **MUSSEY GRADE ROAD ALLIANCE REPLY COMMENTS REGARDING DECISIONS CONCERNING SAN DIEGO GAS AND ELECTRIC'S SHUT OFF PLAN AND RULE 14 CHANGE**

## **I. INTRODUCTION**

The Mussey Grade Road Alliance (Alliance) files this reply with the California Public Utilities Commission (Commission) in accordance with Rule 14.3(d) of the California Public Utilities Commission Rules of Practice and Procedure and in accordance with the instructions contained in the Proposed Decision of Commissioner Simon (Proposed Decision)<sup>1</sup> and the Alternate Proposed Decision of ALJ Kenney (Alternate Proposed Decision).<sup>2</sup> The Alliance finds numerous factual errors in the Opening Comments of SDG&E regarding both the Proposed and Alternate Proposed Decisions.

## **II. SDG&E'S RISK ASSESMENT IS INCOMPLETE AND ERROR-LADEN**

SDG&E's comments on the Alternative Proposed Decision assert that ALJ Kenney errs in his risk assessments.<sup>3</sup> SDG&E bases this assertion on Cal Fire data that the company submitted into evidence late in the proceeding<sup>4</sup>. In fact, this same Cal Fire data, if correctly analyzed, is likely to show greatly enhanced risk to the public due to extended power outages. Therefore, the data support the risk assessments of ALJ Kenney in his decision.

### **A. SDG&E Has Created a Procedural Problem by Late Submission, Followed by Incorrect Analysis, of Data**

SDG&E submitted Cal Fire data late in the proceeding and then misinterpreted the data. The Alliance believes that the submission of statistical data late in the application process is inappropriate because it leaves insufficient time for careful calculation and analysis<sup>5</sup>. As the issue

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<sup>1</sup> A.08-12-021; PROPOSED DECISION OF COMMISSIONER SIMON; DECISION GRANTING SAN DIEGO GAS & ELECTRIC COMPANY CONDITIONAL AUTHORITY TO IMPLEMENT ITS POWER SHUT-OFF PLAN AS A PILOT PROGRAM; AND GRANTING IN PART AND DENYING IN PART THE PROPOSED CHANGES TO TARIFF RULE 14; August 11, 2009.

<sup>2</sup> A.08-12-021; ALTERNATE PROPOSED DECISION DENYING WITHOUT PREJUDICE SAN DIEGO GAS & ELECTRIC COMPANY'S APPLICATION TO SHUT OFF POWER DURING PERIODS OF HIGH FIRE DANGER; August 11, 2009.

<sup>3</sup> A.08-12-021; COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) ON THE ALTERNATE DECISION OF ALJ KENNEY; August 31, 2009; pp. 3-5 (SDG&E Comments, ALJ Kenney).

<sup>4</sup> A.08-12-021; MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY FOR OFFICAL NOTICE; July 21, 2009.

<sup>5</sup> Alliance Comments on Decisions; pp. 4-5.

before the Commission regards life and death, a cursory evaluation by SDG&E of numbers presented in data is problematic and has led the company to incorrect conclusions. Instead of a last minute approach, this data should be carefully evaluated in the context of an independently-moderated cost/benefit analysis.

It is with some reluctance, then, that we delve into our own analysis at this time of the numbers presented by SDG&E based on the Cal Fire data. We urge the Commission to view the Alliance analysis not as a definitive prediction of risk, but rather as a demonstration that a shut-off plan must not be approved without adequate analysis

### **B. SDG&E Has Selectively Submitted Information to the Commission and is Deceptive in Its Use of the Information**

SDG&E submitted Cal Fire statistics regarding equipment fires well after the comment/reply period ended, apparently in the (incorrect) belief that these numbers would bolster its assertion that the incremental risk increases due to shut-off are negligible. Omitted from their filing was Cal Fire statistics on candle fires<sup>6</sup>, which show that there are more than 20 times more structure fires started by candles per year in California than by generators. This demonstrates the extremely selective nature of the data that SDG&E has provided to the Commission to support its application. More insidious is the use of some statistics to argue for conclusions that SDG&E must certainly know are untrue. For instance, when SDG&E states that “there are over 5,000 outages per year on SDG&E’s system and that perhaps one or two more per year might be caused by EPSO”<sup>7</sup>, SDG&E apparently intends to imply that shut-off represents .05% of the outage burden that customers will experience, but neglects to state that most of these are momentary, and affect small numbers of customers. In fact, the 10,000 or so customers<sup>8</sup> affected by shut-off every year will see their mean outage time per year jump from 0.9 hours<sup>9</sup> to 36 hours<sup>10</sup>, a factor of 40 (ranging from 20 to 60, varying assumptions from “optimistic” to “pessimistic”), based on the estimated outage frequency and duration provided

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<sup>6</sup> <http://osfm.fire.ca.gov/cairs/pdf/candle.pdf>

<sup>7</sup> SDG&E Comments, ALJ Kenney, p. 5.

<sup>8</sup> Ibid.; p. 4.

<sup>9</sup> A.08-12-021; OPENING COMMENTS OF UTILITY CONSUMERS’ ACTION NETWORK; (UCAN) UCAN’s Review of its Proactive De-Energization Measures and Approval of Proposed Tariff Revisions; March 27, 2009; p. 20.

<sup>10</sup> A.08-12-021; COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY; March 27, 2009; p. 3.: “the plan is likely to result in 1 to 2 shut-off events per year”... “Customers may experience power outages up to 12 to 72 hours, with the duration typically being toward the shorter end of this range for the vast majority of customers for most events.” We adopt 24 hours as “average”, 18 hours as “optimistic”, and 36 hours as “pessimistic” estimates, with 1.5 being the average number of events per year. This means that there will typically be 36 hours of power loss per year for affected customers (range 27 hours “optimistic” to 54 hours “pessimistic”).

by SDG&E. The difference between 0.05% and 40 is 80,000 – the factor by which SDG&E’s argument errs.

### **C. SDG&E’s Calculation for Risk Due to Generators is Wrong and Generators May Pose a Substantial Risk During Shut-Off**

SDG&E does an informal calculation to estimate the expected number of fires due to generators during shut-off, and concludes it is “perhaps statistically indeterminable from zero”<sup>11</sup>. We will show that this is in gross error, and that generator fires may be a significant hazard during outages. Assuming 10,000 affected customers and about three persons per household, this leads to an affected population of 30,000, very roughly 0.1% of the population of California<sup>12</sup>. The Cal Fire report put into evidence by SDG&E shows 71 fires over five years, for a rate of 14.2 generator fires per year. Hence, an “average” segment representing 0.1% of the population of California would expect to see .0142 fires per year. However, the population of our shut-off area is not average with respect to California.

As shown in the previous section, outages for the 10,000 households affected by the shut-off plan will be longer by a factor of 40 than the typical outage experienced by an SDG&E household. It is a reasonable assumption that the probability of accident or malfunction will be proportional to how long the generators are operated. If so, this ratio must be applied to the expected number of fires per year.

Additionally, we *must* take into account the fraction of the population that owns generators, compared to the “average” Californian. The outage areas are predominantly rural, and would be expected to have much higher generator ownership than would be expected in urban and suburban areas, which constitute a large fraction of California’s population. In fact, SDG&E states that a substantial number of customers have backup generation.<sup>13</sup> Additionally, we would expect ownership to drastically increase, since 1) electricity will no longer be considered reliable in potential shut-off areas, and 2) SDG&E is now supporting generator ownership for customers in

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<sup>11</sup> Ibid; p. 5.

<sup>12</sup> Ibid.

<sup>13</sup> A.08-12-021; COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY; March 27, 2009; p. 25; “it appears that many customers are well prepared for emergencies and some are less prepared; for example have installed backup generation.”

these areas.<sup>14</sup> We assume the generator ownership rate will be 10 times higher than average in the shut-off areas, with a range from 5 times (optimistic) to 20 times (pessimistic).

Finally, we need to take into account the fraction of usage *due to* shut-off. For generators, this will be near 100%, since most people don't need them unless power is off.

We can then estimate the number of generator fires that might be expected:

	<b>Optimistic</b>	<b>Typical</b>	<b>Pessimistic</b>
Avg. CA Generator X fires / year for 30k pop.	0.0142	0.0142	0.0142
Outage length / average X	20	40	60
Ownership / average X	5	10	20
Fraction shut-off usage	1.0	1.0	1.0
<b>= Total fires in EPSO/yr</b>	<b>1.4</b>	<b>5.7</b>	<b>17.0</b>

While other factors might affect these calculations, the calculations establish that the threat from generator fires may be significant, in contradiction to what SDG&E claims. SDG&E's insufficient and cursory approach lends itself to misinterpretation of the data. This example demonstrates the need for thorough and impartial analysis, which should also include candle fires and other data.

#### **D. Reduction of Fire Risk from Electrical Equipment Due to Shut-Off is Minimal**

SDG&E points out that shut-off will prevent electrical fires that might otherwise occur, but it neglects to calculate how many. We do so now.

SDG&E lists electrical fire sources from the Cal Fire data<sup>15</sup>, which total 1734 fires in five years, or 347 fires per year. Using the assumptions of the previous section, this would lead to about 3.5 fires per year for the 30,000 affected people. These fires are uncorrelated with shut-off, and therefore the average number of prevented fires per year would range from .011<sup>16</sup> (27 hour avg. outage/yr.) to .022 (54 hour avg. outage/yr.). This is negligible compared to added risks.

### **III. SDG&E COMMENTS UNDERLINE SHORTCOMINGS IN THE PROPOSED DECISION**

<sup>14</sup> A.08-12-021; MUSSEY GRADE ROAD ALLIANCE COMMENTS ON PROPOSED AND ALTERNATE PROPOSED DECISIONS REGARDING SAN DIEGO GAS AND ELECTRIC'S SHUT OFF PLAN AND RULE 14 CHANGE; August 31, 2009; p. 5.

<sup>15</sup> SDG&E Comments, ALJ Kenney, p. 4.

<sup>16</sup> We assume affected population is "average" with respect to electrical equipment. Probability of a fire being prevented is then  $\langle N \rangle * T / 365$ , where  $\langle N \rangle$  is the average number of fires and T is the mean outage time in days per year.

### **A. The Proposed Decision Incorrectly Assumes Shut-Off is Temporary**

A basic tenant of the Proposed Decision is that SDG&E may be permitted to go forward with its shut-off plan while it completes its “hardening” program, which “may obviate the need for the shut-off program”.<sup>17</sup> However, SDG&E clarifies in its comments that it intends that shut-off to be permanent unless all lines are undergrounded<sup>18</sup> (for which it has no plans). By thus undermining one of the assumptions of the Proposed Decision (that shut-off might be a reasonable interim measure), it provides weight to the argument that the Alternative Decision should be adopted.

### **B. SDG&E Has Demonstrated that it Needs External Oversight**

SDG&E argues that the “Oversight Committee” proposed by Commissioner Simon be replaced by Committees under SDG&E control.<sup>19</sup> However, as we have demonstrated in our filings, SDG&E’s proclivity to hide information, to mislead, and inability to provide correct calculations indicate that any future oversight body or cost-benefit analysis, such as that suggested by ALJ Kenney,<sup>20</sup> must be neutrally moderated and *must not* be under SDG&E control.

## **IV. CONCLUSION**

The more closely we read SDG&E filings and public statements, the more convinced the Alliance becomes that no shut-off plan can be given the blessings of the Commission without a full analysis because the SDG&E proposed shut-off plan poses a grave risk to lives and property in San Diego County, including our own. We urge the Commission to approve the Alternate Proposed Decision of ALJ Kenney denying this shut-off plan.

Respectfully submitted this 8<sup>th</sup> day of September, 2009,

By:       /S/       ***Diane Conklin***

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<sup>17</sup> Proposed Decision; p. 51.

<sup>18</sup> SDG&E Comments; Commissioner Simon, p. 14.

<sup>19</sup> Ibid. pp. 7-8.

<sup>20</sup> Alternate Proposed Decision; p. 54.

## CERTIFICATE OF SERVICE

I hereby certify that pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have served a true copy of the **MUSSEY GRADE ROAD ALLIANCE REPLY COMMENTS REGARDING DECISIONS CONCERNING SAN DIEGO GAS AND ELECTRIC'S SHUT OFF PLAN AND RULE 14 CHANGE** to all parties on the service list for Application A.08-12-021 via electronic mail.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 8<sup>th</sup> day of September, 2009 at Ramona, California.

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