
**SENATE COMMITTEE ON ENERGY, UTILITIES AND
COMMUNICATIONS**
Senator Ben Hueso, Chair
2019 - 2020 Regular

Bill No:	SB 1312	Hearing Date:	5/26/2020
Author:	McGuire		
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Urgency:	No	Fiscal:	Yes
Consultant:	Nidia Bautista		

SUBJECT:Electrical corporations: undergrounding of infrastructure:
deenergization

DIGEST: This bill proposes a number of requirements related to reducing wildfire risks and proactive power shutoffs by electric investor-owned utilities (IOUs). Specifically, this bill would require a revision to an existing electric tariff in order to underground overhead electric and communications lines in high fire threat areas. This bill also includes several provisions related to oversight requirements by the California Public Utilities Commission (CPUC) of electric IOUs' efforts to reduce their fire risk and use of proactive power shutoffs, including specified reporting, ability to assess fines and penalties, notification requirements, and require specified fire risk mitigation capital expenditures by the electric IOUs by prescribed dates.

ANALYSIS:

Existing law:

- 1) Establishes the CPUC has regulatory authority over public utilities, including electrical corporations. (California Constitution, Article XII, §§3 & 4)
- 2) Requires each electrical corporation to annually prepare a wildfire mitigation plan and to submit its plan to the commission for review and approval, as specified. Requires the wildfire mitigation plan to include, among other things, protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety. (Public Utilities Code §8386)
- 3) Requires every public utility to furnish such reports as the CPUC may require. (Public Utilities Code §584)
- 4) Requires the CPUC to establish the Wildfire Safety Division within the CPUC to undertake specified tasks. (Public Utilities Code §726)

- 5) Transfers all function of the Wildfire Safety Division, effective July 1, 2021, to the Office of Energy Infrastructure Safety. (Government Code §15470)
- 6) Requires each electrical corporation to annually prepare and submit a wildfire mitigation plan to the CPUC for review and approval, as specified. Requires a wildfire mitigation plan of an electrical corporation to include, among other things, protocols for deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communications infrastructure. (Public Utilities Code §8386)
- 7) Authorizes the CPUC to impose fines and civil penalties for the violation of the California Constitution, statutes, or an order, decision, or requirement of the CPUC by a public utility. (Public Utilities Code §1701.6)
- 8) Declares that it is the policy of the state to achieve, whenever feasible and not inconsistent with sound environmental planning, the undergrounding of all future electric and communication distribution facilities which are proposed to be erected in proximity to any highway designated a state scenic highway and which would be visible from such scenic highways if erected above ground. (Public Utilities Code §320)

This bill:

- 1) Requires the CPUC to revise Electric Tariff Rule 20 to additionally authorize and fund, whenever feasible, the undergrounding of electrical and communication infrastructure within certain CPUC-designated high fire-threat areas for purposes of wildfire mitigation.
- 2) Requires the CPUC to develop a standard against which to measure the prudence of an electrical corporation's conduct of a public safety power shutoff (PSPS), as defined, and an electrical corporation's fire risk mitigation capital expenditures on the distribution or transmission infrastructure that motivated the public safety power shutoff.
- 3) Requires an electrical corporation that conducts a PSPS to report specified information about the shutoff and its infrastructure expenditures to the CPUC.
- 4) Requires the CPUC to hold a public hearing to determine whether a PSPS was conducted prudently. Requires the CPUC, if it determines a shutoff or related

expenditures were not conducted prudently, to levy fines and penalties against the electrical corporation.

- 5) Requires an electrical corporation to notify the CPUC, the Office of Emergency Services (Cal OES), and the Department of Forestry and Fire Protection (Cal FIRE) of a potential public safety power shutoff.
- 6) Requires an electrical corporation, on or before July 1, 2021, to identify and report to the CPUC at least 15 percent of its transmission and distribution infrastructure that is most likely to cause a PSPS or ignite a wildfire, that needs fire risk mitigation capital expenditures, and for which fire risk mitigation capital expenditures have not been made by July 1, 2021.
- 7) Requires fire risk mitigation capital expenditures to be made on at least 50 percent of that infrastructure so that a PSPS is not necessary due to that infrastructure except in extraordinary circumstances by July 1, 2023, on at least 75 percent of that infrastructure by July 1, 2024, and on all of that infrastructure by July 1, 2025.

Background

California wildfire and electric utility infrastructure. Electrical equipment, including downed power lines, arcing, and conductor contact with trees and grass, can act as an ignition source. Risks for wildfires also increased with the extended drought and bark beetle infestation that has increased tree mortalities and, as a result, increased the fuel, and risk for wildfires. In recent years, California has experienced a number of catastrophic wildfires, including several that ignited by electrical utility infrastructure, including the 2007 Witch Fire in San Diego County, the 2015 Butte Fire, several of the 2017 fires that ravaged the state, and the brutally deadly Camp Fire in 2018.

Deenergizing electric lines. Generally, electric utilities attempt to maintain power and ensure continued reliability of the flow of electricity. However, as recent catastrophic fires have demonstrated, the risk of fire caused by electric utility infrastructure can pose a great risk, perhaps greater than the risks of turning off the power to certain circuits. As a safety consideration, electric utilities have the ability and authority to deenergize electric lines in order to prevent harm or threats of harm. However, deenergizing electric lines can result in the loss of power to households, businesses, traffic signals, communication systems, critical facilities, water treatment facilities, emergency services and others. Therefore, efforts to deenergize electric lines must consider the potential harm of the energized lines

causing a wildfire against the safety hazards associated with eliminating electricity to the areas served by the line(s).

Recent history with power shutoffs. Utilities have increasingly utilized proactive power shutoffs as a tool to prevent sparking. The practice began by San Diego Gas & Electric (SDG&E) after several electric utility infrastructure-ignited catastrophic fires in 2007. Proactive power shutoffs were one of the many measures SDG&E implemented to reduce the risk of fire ignited by its infrastructure (other measures included installing steel poles and expanding ground and aerial inspections). Although the use of proactive power shutoffs were met with opposition and concerns about its use by communities, ultimately the CPUC acknowledged SDG&E's authority to deenergize lines in order to protect public safety, noting this authority in Public Utilities Code §451 and §399.2. In April 2012, the CPUC adopted a decision (D. 12-04-024) that required SDG&E to provide notice and mitigation, to the extent feasible and appropriate, whenever the utility deenergized electric lines. Additionally, the CPUC required SDG&E to provide specified reporting after a proactive power shutoff event and noted the CPUC may conduct a post-event review to determine whether the utility was reasonable.

CPUC extends proactive power shutoffs protocol requirements to other utilities. Following the catastrophic fires in 2017 (including Thomas and North Bay Fires), in July 2018, the CPUC adopted a staff resolution (ESRB-8) to extend the reasonableness, public notification, mitigation and reporting requirements in the SDG&E decision to all electric IOUs, including Pacific Gas and Electric (PG&E) and Southern California Edison (SCE). Per the CPUC requirements, after a PSPS event, the utility must inspect the lines of the circuits that were shutoff before it can restore power. As such, the duration of a power shutoff event may last several days. Under Resolution ESRB-8, the CPUC also requires utilities to meet with local communities before employing the power shutoff practice in a particular area, requires feasible and appropriate customer notifications prior to a deenergization event, and requires notification to the Safety and Enforcement Division of the CPUC after a decision to deenergize facilities. In adopting the resolution, CPUC commissioners expressed a desire that the power shutoffs would only be used as a "last resort" by the utilities.

September/October 2019. At the end of September 2019, under high-speed Diablo wind conditions, PG&E sent PSPS notifications to a widespread region of its service territory and ultimately shutdown power in roughly two events to 76,000 customers in the North Bay and Sierra Foothill areas. This was the first back-to-back power shutoff event for PG&E in the same geographic area. These power shutoffs set the stage for continued PSPS activity throughout the month of October, including within the service territories of each of the three large electric IOUs. In some cases, especially in the PG&E territory, these events bled into each other. As

a result, customers experienced extended days with loss of power, as the utility did not have enough time to complete inspections of the deenergized electric lines before the initiation of the next PSPS event. In total, over two million California residents endured the loss of power in communities located in about 40 of the state's 58 counties. These incidents became even more challenging as wildfires in both northern California and southern California meant some evacuations needed to be executed with a lack of reliable communication services, traffic signal outages, schools closed, and hospitals struggling to keep the lights on, even with their existing backup generators. Additionally, customer efforts to understand what infrastructure and which locations lost power were hampered as electric IOU websites were down – including those of PG&E and SCE – due to the increased traffic to each of the utilities' websites. There were also reports about unreliable maps and confusing information regarding the affected geographic areas. This confusion was especially acute in the PG&E territory. In response to the myriad of challenges created by the proactive power shutoffs, the CPUC held an emergency meeting for the first time requiring an electric IOU to come before it specifically to explain what happened during the proactive power shutoff and steps the utility would be taking to prevent the same failures. In this and future hearings (including one held by this committee in November 2019), the Chief Executive Officer of PG&E stated that it would take the utility ten years to implement the necessary upgrades to its system to achieve a similar use of proactive power shutoffs as currently used by SDG&E.

SB 901 requires power shutoff protocols. SB 901 (Dodd, Chapter 626, Statutes of 2018) included a requirement to adopt protocols for deenergization events. In December 2018, the CPUC opened a rulemaking proceeding (R. 18-12-005) to delve more deeply into the use of proactive power shutoffs as a wildfire prevention tool, including further examining de-energization policies and guidelines. In May 2019, the CPUC made its decision on Phase 1 of the proceeding (D. 19-05-042), adopting communication and notification guidelines for the electric IOUs to expand on those required in the July 2018 resolution. In August 2019, the CPUC opened a second phase of the proceeding to address identification and communication with access and functional needs populations, communication with customers while the power is turned off, communication during deenergization, mitigation measures, coordination with relevant agencies (including first responders), and transmission-level deenergization. More recently, the CPUC has proposed updated notification requirements, coordination with local governments and critical facilities, better addressing the needs of customers with access and functional needs, and guidelines on the use of community resource centers.

Wildfire Mitigation Plan (WMP). As a result of SB 1028 (Hill, Chapter 598, Statutes of 2016), and further expanded by SB 901 (Dodd, Chapter 626, Statutes of 2018) and AB 1054 (Holden, Chapter 79, Statutes of 2019), electric IOUs are

required to file WMPs with guidance by the CPUC, specifically the Wildfire Safety Division (WSD). The CPUC also reviews and determines whether to approve these plans and ensures compliance with guidance and statute. The electric IOUs' WMPs detail, describe and summarize electric IOU responsibilities, actions, and resources to mitigate wildfires. These actions include plans to harden their system to prevent wildfire ignitions caused by utility infrastructure, such as widespread electric line replacement with covered conductors designed to lower wildfire ignition, pole replacement, and other actions. The plans also include information regarding the electric IOUs' efforts to conduct extensive vegetation management to reduce the risk of tree branches, grasses, and other vegetation from coming into contact with utility infrastructure. The CPUC has further expanded the requirements within the WMPs in its active proceeding (R. 18-10-007) and has an open comment period for its review of the three large electric IOUs' current WMPs.

Undergrounding of electric facilities. Undergrounding is the process of replacing overhead lines that provide services such as electricity or communications with lines located underground. The undergrounding of electrical and communications lines is typically done for aesthetic or safety purposes in order to remove the visible overhead lines and poles or to reduce the risk of damage or fire from being exposed to the elements. Undergrounding is generally much more expensive relative to overhead infrastructure – on the order of 10 times or more. However, operating costs may be less assuming the underground results in a reduced need to repair damaged lines. Nonetheless, the costs for undergrounding lines can vary depending on the location of the lines: rural, urban, or suburban communities. Based on a February 2020 CPUC Staff Report, “the electric IOUs reported that undergrounding electric lines costs between \$2.6 million and \$6.1 million per mile which is far more expensive than other fire hardening measures such as replacing wooden poles with steel poles and installing covered conductors which the utilities report as costing \$480,000 per mile.”

California Overhead Conversion Program, Electric Tariff Rule 20. The CPUC requires electric IOUs to allocate a certain amount of ratepayer funds each year for undergrounding conversion projects. The electric utility annually allocates funds via credits under Electric Tariff Rule 20 to communities, either cities or unincorporated areas of counties, to convert overhead electric lines to underground facilities. Since ratepayers contribute the bulk of the costs of Rule 20A programs through utility rates, the projects must be in the public interest, meeting specified criteria. The CPUC instituted the current undergrounding program in 1967 and has made mostly slight adjustments to the program over the 50 years. In 2014, the CPUC authorized SDG&E the ability to consider wildfires when converting electric facilities to underground. The CPUC agreed with SDG&E that

undergrounding could mitigate the risks of wildfires in the more fire-prone areas of SDG&E's service territory. The CPUC approved a SDG&E specific version of Rule 20D that is modeled on Rule 20A, but targeted to the most fire-prone areas. The CPUC is currently reevaluating the Electric Rule 20 program and has proposed a number of recommendations, including to sunset the 20A program but expand the public interest criteria in 20B to account for safety and reliability concerns. The safety concerns could include wildfire risks, and the limitations of egress and ingress in a community within the high fire threat district, but with a greater contribution from the local community.

The table below notes the Electric Tariff Rule 20 programs and the ratepayer contribution for each:

Electric Tariff Rule 20			
Rule	Ratepayer Contribution	Municipality or Third Party Contribution	Criteria
20A	80-100%	Max. of 20% cost from street to meter Min. 0% if use main line funds	Public interest
20B	20%	80%	N/A
20C	Minimal	100%	Typically small projects
20D	80%	Max. 20% cost from street to meter Min. 0% if use main line funds	Facilities within SDG&E Fire Threat Zone

Local jurisdiction contributions. Under the Improvement Act (Act) of 1911, cities, counties and other municipal governments are authorized to designate areas within which public agencies officials and individual property owners may enter into contractual assessments to finance a wide range of public infrastructure projects. An assessment district is formed as an alternative method for financing public improvements by a sponsoring local government agency. One type of assessment district that the Act authorizes is an underground utility district (UUD), which is formed for the purposes of converting above ground infrastructure to below ground. UUDs are formed via petition or by a determination of the legislative body. Current law requires a legislative body to determine that the city or a public utility has voluntarily agreed to pay over 50 percent of all costs of conversion, excluding costs of users' connections to underground electric or communication facilities in order to initiate proceedings.

CPUC High Fire-Threat District. The CPUC's efforts to map high-fire threat stem from the catastrophic wildfires caused by utility infrastructure in San Diego

County in the 2000s. The CPUC mapping efforts combine the Tree Mortality Taskforce Map with CPUC/Cal FIRE Tier 2 and Tier 3 designations. Tier 2 fire-threat areas depict areas where there is an elevated risk (including likelihood and potential impacts on people and property) from utility associated wildfires. Tier 3 fire-threat areas depict areas where there is an extreme risk (including likelihood and potential impacts on people and property) from utility associated wildfires.

WMPs and undergrounding. Per statute, electric utilities must file wildfire mitigation plans with specified information about where they considered undergrounding electric lines to address wildfire risks. In the recently filed plans, the electric utilities include some undergrounding of electric lines. However, in general, they have preferred other more cost-effective options, such as covered conductors, replacement of wooden poles with fire-resistance materials. Nonetheless, the amount of undergrounding via the WMPs seems to trump that of the Rule 20 program. For example, in its recent WMP, SCE notes that last year they converted 0.3 miles of overhead lines to undergrounding. However, in their WMP, they are proposing targeted undergrounding projects, especially in communities with egress and ingress challenges. They expect to convert six miles in 2021 and 11 miles the year after to undergrounded lines.

Comments

This bill incorporates numerous provisions to address the issues that occurred last fall when over two million customers were left without power, and local and state governments were left scrambling to address the ramifications of such widespread power outages, especially those implemented by PG&E. The author states his interest to “create a framework to shorten and decrease PSPS events and to ultimately eliminate their use by requiring electric IOUs to take both short- and long-term steps to harden their infrastructure.” This bill prescribes measurements to ensure that electric IOUs are making aggressive progress towards reducing the need for proactive power shutoffs and reducing wildfire risks of their systems. Specifically, this bill requires the electric IOUs to make measurable progress, measured by a percentage of its infrastructure that will receive fire risk mitigation capital expenditures with the goal of achieving a goal of no longer needing to utilize proactive power shutoffs to mitigate against fires by July 2025 (five years). This bill also requires specified oversight of proactive power shutoffs events, including specified reports to the CPUC by the electric IOUs, as well as, specifying enforcement when power shutoffs are utilized in a manner inconsistent with the law or CPUC rules. Additionally, this bill includes a provision to require a revision of Electric Tariff Rule 20 to fund undergrounding conversion projects for communications and electrical lines in Tier 2 and Tier 3 high fire threat areas. Lastly, this bill includes provisions requiring notifications to state agencies when

proactive power shutoffs are activated, determined to be used, initiated, and reenergizes the lines, and completes the reenergization process. SB 1312 would also authorize joint emergency regulations by the OES, the Cal FIRE, and the CPUC.

Need for Accountability. The governor, the CPUC, and members of the Legislature have commented on the desire to not repeat the experience from the power shutoff events of last fall. The experience led to an eight plus hours hearing by this committee where members representing many aspects of the community relayed the challenges they experienced during the multiple days of outages and notifications. SB 1312 attempts to tackle the challenges of PG&E's insistence that their system upgrades will take 10 plus years to achieve the same level of outages (proportionately) as experienced in SDG&E's territory. The need to aggressively reduce the timeline seems apparent, including to the CPUC who has been taking more aggressive action to ensure progress towards the WMP of the utilities. While this bill may be duplicative in some areas to existing CPUC rules, the need to provide a legislative backstop has merits, as future CPUC commissioners' attention and focus could shift to other matters. However, there are some areas where the requirements of this bill may need further adjustment in order to provide more flexibility to account for new information. In this regard, the committee intends to continue working with the author should this bill move forward.

Ratepayer impacts. The provision in this bill to require a revision to Electric Tariff Rule 20 is largely consistent with a current CPUC staff recommendation, although this bill is silent as to the portion the conversion that should be funded by ratepayers. As these issues come to resolution in the proceeding at the CPUC, the committee may want to ensure the portion is appropriately limits the ratepayer contribution in this bill. Additionally, the Electric Tariff Rules should not be used to fund the conversion of telecommunications infrastructure, as telecommunications providers have their own tariffs (including 32) to fund underground conversions. *Therefore, the author and committee may wish to amend this bill to delete the reference to "communication infrastructure" in order to better protect electric ratepayers from these costs.*

Regulatory jurisdiction. The language in this bill concerning joint emergency regulations could undermine the existing regulatory authority of the CPUC. *The author and committee may wish to amend this bill to recast and rewrite the language in a manner that directs the CPUC to adopt regulations, if needed, and in consultation with CalOES and Cal FIRE (Section 927. (c))*

Technical amendments needed. Section 928 (c) includes a reference to Public Utilities Code § 8386.3, but should also include § 8386.4 which addresses the cost

recovery process codified under AB 1054. *The author and committee may wish to amend this bill to add a reference to Public Utilities Code §8386.4.*

Prior/Related Legislation

SB 378 (Weiner, 2019) requires numerous provisions related to an electrical IOU decision to proactively shut off power, including requiring reimbursements of specified costs, specified penalties for shutting off power, and other reporting. The bill is currently awaiting to be referred to policy committee in the Assembly.

SB 801 (Glazer, 2020) establishes new requirements on electrical corporations regarding deployment of backup electrical resources to customers receiving medical baseline allowance, if the customer meets specified conditions, and requires an electrical corporation to develop its program to provide backup electrical resources in consultation with community disability rights groups or other local disability rights advocates. The bill is pending in the Senate Committee on Appropriations.

SB 862 (Dodd, 2020) (1) adds planned deenergization events, as defined, within the conditions that constitute a state of emergency; and (2) adds new requirements of electrical corporations regarding protocols to deal with individuals with access and functional needs, and (3) requires coordination with local governments on the location and operation of community resource centers during deenergization events. The bill is pending in the Senate Committee on Appropriations.

SB 70 (Nielsen, Chapter 400, Statutes of 2019) required each electrical corporation's WMP to include a description of where and how the electrical corporation considered undergrounding electrical distribution lines within those areas of its service territory identified to have the highest wildfire risk in a specified fire threat map.

SB 247 (Dodd, Chapter 406, Statutes of 2019) made several changes related to the vegetation management requirements of electrical corporations, including: requiring specified notifications to the CPUC Wildfire Safety Division (WSD) about the vegetation management conducted; requiring specified audits by the WSD; authorizing the WSD to engage an independent evaluator and issue a report.

SB 584 (Moorlach, 2019) would have made changes to programs that help fund conversion projects to replace overhead electrical infrastructure with underground electrical infrastructure in specified areas of the service territory of IOUs. The bill was held in the Senate Committee on Appropriations.

AB 1054 (Holden, Chapter 79, Statutes of 2019) shifted the responsibility for review of wildfire mitigation plans from the CPUC to the WSD of the CPUC (temporarily located there) and made modifications to the review process, among other provisions.

AB 111 (Committee on Budget, Chapter 81, Statutes of 2019) required, by January 1, 2020, the CPUC to establish the WSD within the CPUC and requires all functions of the WSD to be transferred to Office of Energy Infrastructure Safety, effective July 1, 2021.

SB 901 (Dodd, Chapter 626, Statutes of 2018) established the requirement that the WMPs of each electrical corporation meet a number of specified requirements, among other provisions.

SB 1028 (Hill, Chapter 598, Statutes of 2016) required electric IOUs to file annual WMPs and requires the CPUC to review and comment on those plans. The bill also required POU and electrical cooperatives to determine their risk of catastrophic wildfire that can be caused by their electric lines and equipment and, if a risk exists, submit WMPs to their governing board for its approval.

SB 1463 (Moorlach, 2016) would have required the CPUC, in consultation with the Cal FIRE, to prioritize areas where communities are subject to conditions that increase fire hazards associated with overhead utility facilities when determining areas which it will require enhanced mitigation measures for wildfire hazards posed by overhead electrical lines and equipment. The bill was vetoed.

FISCAL EFFECT: Appropriation: No Fiscal Com.: Yes Local: Yes

SUPPORT:

California Ambulance Association
California State Sheriffs' Association
League of California Cities
Marin Clean Energy
Northern California Power Agency
Rural County Representatives of California, if amended
Sonoma Clean Power
Valley Clean Energy

OPPOSITION:

California State Association of Electrical Workers, unless amended
Coalition of California Utility Employees, unless amended

Pacific Gas and Electric Company
San Diego Gas & Electric
Southern California Edison

ARGUMENTS IN SUPPORT: The organizations in support of the bill universally comment on the issues that have transpired in recent proactive power shutoff events and the desire to ensure greater accountability, coordination, and transparency associated with system improvements and future proactive power shutoff events.

In support of this bill, Sonoma Clean Power states:

Power shutoffs are intended as a utility's last resort to mitigate the risk of fire. However, the growing threat posed by the wildfires means the utility's voluntary use of power shutoffs has increased significantly as we saw in 2019. With the passage of SB 1312, communities in the high fire-threat areas will know the electrical corporations have a date specific to harden the necessary infrastructure and that they will not be charged for electricity service not provided during a PSPS event.

The California State Sheriffs' Association states:

SB 1312 requires electrical corporations to provide important PSPS information to state entities and report on the progress of their distribution and transmission line hardening efforts. This bill will improve public safety and keep communities connected to vital services.

ARGUMENTS IN OPPOSITION: The organizations opposed to this bill express multiple areas of concern, including: duplication with existing CPUC rules, proceedings and efforts; rigid timelines for utility infrastructure improvements; undermining of CPUC state constitutional authority to regulate electric IOUs; and concerns that the bill ignores the comprehensive and strategic approach to mitigate wildfire risk.

In opposing this bill the Coalition of California Utility Employees (CCUE) states:

SB 1312 places strict arbitrary timelines for utilities to complete complex and oftentimes dangerous utility work. These cookie cutter approaches are not appropriate in dangerous construction projects.... Moreover, placing arbitrary timelines on projects will result in contractors pushing deadlines, ignoring safety measures and placing the lives of utility workers at risk!

Southern California Edison states:

SB 1312 overlooks the complexity of the electric grid and how IOUs prioritize wildfire mitigation projects to decrease wildfire ignitions. In determining the timing and resource allocation for wildfire mitigation projects, SCE adopts a risk-informed prioritization approach, which is focused on decreasing the risk of a wildfire ignition, rather than decreasing the likelihood of PSPS events. By having IOUs pivot to focus on decreasing PSPS events, instead of wildfire ignitions, SB 1312 could require IOUs to prioritize electrical service over wildfire safety by shelving critical, safety-focused projects in favor of projects that would decrease the likelihood of a PSPS event. This is a dangerous proposition that could harm thousands of Californians and their homes.

-- END --