

May 11, 2021

RE: BPA Public Safety Power Shutoff Process

PPC appreciates this opportunity to comment on BPA's proposed updates for its Public Safety Power Shutoff (PSPS) process. As shown by the attendance and interest at the April 27 informational meeting, this issue is of high importance to BPA's customers, as PSPS events can have significant safety and service impacts. PPC supports BPA's efforts to formalize these processes, as clear expectations and guidelines will improve the region's ability to respond to potentially dangerous weather events. The work BPA has performed to date is generally a step in the right direction. However, customers desire more and earlier communication, more formalized communication procedures, and clearer definitions for roles and downstream processes than BPA has identified to date.

*Decision-making – Local Input*

BPA should work with utility operators in territories that will be impacted by PSPS to identify key decision factors for that area. While BPA explained that it would consider information on critical loads and utility actions when making PSPS decisions, BPA needs to be sure that utility voices and perspectives are heard and valued. Each territory will face unique risks as a result of a PSPS action, which will be critical to understand before instituting a PSPS.

Local utilities are experts on their own operations and territories, and their knowledge can help BPA to enact measures that lead to the best outcomes. For example, local utilities are aware of critical interconnections with other utilities that may cross state lines/jurisdictions and will be important in the planning/notification steps. As well, BPA has described the PSPS program as "facility specific" and input from local utilities should be a key factor in making those "facility specific" decisions.

BPA should also consider creating formalized lists or outlines of key decision factors in customers' service territory, as this could allow BPA and its counterparts to make decisions more quickly and accurately.

### *Communication – Notification*

PPC requests that BPA provide timely, robust, and transparent communication regarding PSPS events. Because BPA's customers have their own operations and planning measures to undertake during PSPS, early communication is essential to helping them to prepare. BPA should give as much notice about the events as possible. Additionally, the proposal to use account executives and phone calls/email as the primary means of communicating PSPS events is not sufficient. This approach is prone to delay and failure if key personnel are out of the office or unavailable. BPA should work with its customers and other transmission operators to determine the most appropriate channels and methods for PSPS notifications.

Specific requests related to notification timing, process, and breadth of communication include:

- Notify customers as soon as BPA stands up its PSPS Team.
- Make it publicly known to all customers when a PSPS event has occurred.
- Explore creating an automated and pre-populated notification system.
- Notify customers who are served by "high risk" assets so that they can understand their potential exposure to PSPS events.

### *Communication – Coordination, Roles and Responsibilities*

PPC is concerned about the lack of formality and ad-hoc approach that BPA described for downstream communication and coordination during PSPS events. For example, it appears that BPA does not have a notification plan for the general public and is relying on utilities to handle this on their own. Additionally, BPA's current PSPS process does not specify who owns coordination with EMS services during PSPS events. These gaps are unacceptable and could be prone to breakdown in emergency situations. Instead, BPA should work with customer utilities to create clear procedures, roles, and responsibilities for PSPS events. This includes both operational coordination and well as processes and support for public communication. Specific requests include:

- Team with customer utilities to ensure public communications are synchronized between BPA and customer utilities.
- Include a crosswalk of operations to operations understanding, or "standing orders," between BPA and utilities when PSPS decisions are activated that enables clear communication when utilities are asked to take a forced outage during wildfire events.
- Provide tools for BPA customers to conduct outreach in their communities, such as a checklists of notification considerations and steps that BPA intends to take or is expecting a customer to take.

### *Annual Review and Process Improvement*

As with most processes and procedures, it is unlikely that BPA will create a perfect system on the first attempt. To improve outcomes year to year, BPA should commit to annual PSPS policy reviews and check in with customers to confirm contact information and assess the efficacy of policies and practices. Specific requests include:

- Provide a clearer crosswalk between the previous informal process and the new PSPS process.
- Review PSPS processes at the end of each fire season to improve the policy for future years.
- Perform annual pre- and post-fire season check-ins with customers to confirm contacts and procedures.