



**COUNTY OF LAKE
BOARD OF SUPERVISORS**

Courthouse - 255 North Forbes Street
Lakeport, California 95453
TELEPHONE (707) 263-2368
FAX (707) 263-2207

Moke Simon – District 1

Bruno Sabatier – District 2

Eddie Crandell – District 3

Tina Scott – District 4

Jessica Pyska – District 5

July 26, 2022

President Alice Reynolds
California Public Utilities Commission
505 Van ness Avenue
San Francisco, CA 94102

Dear President Reynolds,

The County of Lake writes the California Public Utilities Commission (Commission) to express its support for the motion submitted by Pioneer Community Energy, Sonoma Clean Power, East Bay Community Energy, Marin Clean Energy, and Rural County Representatives of California (“Joint Parties”) requesting that the Commission open an expedited phase or track of the De-Energization Rulemaking to consider rules, expanded reporting requirements, and common program-related terms for all investor-owned utilities’ (“IOUs”) Fast-Trip Programs

Fast Trip Programs are IOU programs intended to reduce wildfire risk by significantly increasing the sensitivity of protective devices and equipment that trigger automatic outages. Current Fast-Trip Programs include PG&E’s *Enhanced Powerline Safety Settings* (“EPSS”) program, Southern California Edison’s (“SCE”) *Fast Curve Settings* (“FCS”), and San Diego Gas & Electric (“SDG&E”) refers to this program as fast protection settings.

We understand and support the use of wildfire risk reduction programs and equipment settings to prevent incidents like the Dixie Fire, Camp Fire, Sulphur Fire, and others. At the same time, we frequently experience the dislocation caused by the sudden loss of power (whether from a PSPS or a Fast Trip outage) and recognize the public safety and welfare challenges they create. Furthermore, the frequency with which some residents and communities experience Fast Trip outages is unacceptable without utilities taking proactive steps to quickly harden and improve the impacted infrastructure to prevent future outages. We are concerned that this Fast Trip program that poses a significant threat to the health and welfare of our constituents due to frequent interruptions of electric service is being executed without an adequate level of review or oversight by the CPUC.

Under the De-Energization Proceeding, the Commission developed extensive rules governing the conduct, mitigation, restoration, and reporting associated with PSPS events. Fast Trip events create the same types of potentially disastrous impacts those residents affected (and are often occurring as a mitigation tool to reduce the frequency and extent of PSPS events), but the Commission has no formal policies or procedures in place for these Fast-Trip-related outages.

For these reasons, we strongly recommend the Commission approve the motion submitted by the Joint Parties.

Respectfully submitted,

Eddie Crandell, Chair