



November 5, 2019

Attn: President Marybel Batjer
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
415-703-2782 (p)
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RE: Letter of Concern on Public Safety Power Shutoff (PSPS) Impacts

President Batjer and Honorable Commission Members:

On behalf of the County of Nevada, City of Grass Valley and City of Nevada City, we are submitting this joint Letter of Concern to you regarding the wide sweeping effects of the October 2019 PG&E Public Safety Power Shutoffs (PSPS) on western Nevada County. Recognizing that PSPS events are intended to help prevent catastrophic loss of life and property from utility caused wildfires, it is imperative that these efforts carefully balance with the myriad negative impacts that PSPS events have on local communities.

The recent PSPS events affected over 43,000 PG&E customers within Nevada County. Our Access and Functional Needs (AFN) populations are in jeopardy through the loss of refrigeration for medication and food, inadequate access to charging stations for life-sustaining devices, inadequate heat to stay warm at home, and life-threatening impacts to local dialysis clinics and other medical facilities. Nevada County Emergency Operations Center identified other public safety risks that included the loss of cellular and broadband VoIP phones for hundreds of households, resulting in the inability to call 911 or receive event updates including evacuation messaging through our CodeRed emergency notification system. Non-functioning traffic lights resulted in increased auto accidents. Despite the loss of communication systems for some, increased calls for service resulted for the Nevada County Dispatch Center and 211 call-center, stressing our law enforcement and community service resources.

For a small County of less than 100,000 people, the financial impacts are widely felt. In the cities of Nevada City and Grass Valley and the unincorporated area of Penn Valley, 332 full-service food facilities (sit-down meals/fast food establishments) adhere to specific guidelines prior to reopening to the public after each PSPS event. The aggregate average daily impact to these food service business owners are estimated around \$398,400 a day with \$1,195,200 in loss for a three-day PSPS event. Locally-owned grocery stores are hard-hit, with inventory loss in the hundreds of thousands of dollars in perishable food products in addition to lost sales revenue. These long-standing locally-owned businesses are less equipped to absorb such extraordinary financial losses than their corporate competitors. Many businesses are non-operational from indirect impacts

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like school closures, loss of internet to process credit card transactions, gas shortages, infrastructure capacity stresses and loss of communication services. A recent survey of small locally owned retail businesses in the City of Grass Valley found losses were as high as \$5,000 to \$10,000 for a 2-day event, with many reporting losses as financially significant.

Other unintended impacts that PSPS events have include increased risk of wildfire from generators and warming fires on private properties from homeless individuals and residents who do not have access to regular heating in sheltered facilities or homes. Public service financial impacts result in staggering costs to taxpayers with the loss of productivity for the County alone estimated at \$313,000 as of the date of this letter. Further, social service departments reliant on State and Federal funding are at jeopardy of not receiving reimbursement funding for services provided. Similarly, PSPS events have a direct impact on public school funding per day for every closure that occurs with indirect costs for those students with working parents or who are socio-economically disadvantaged that receive free or reduced meals. Schools are unable to provide a safe and supportive environment for their most vulnerable students during such events.

Wide-sweeping reoccurring PSPS events create cost to individuals that are cyclical in nature with repeated food spoilage replacement, loss of revenue from work outages to school closures, and repeated purchases for back-up equipment like generators, lights, batteries, and fuel. Residents reliant on wells are without basic amenities like running water, operating bathrooms, and heat for days compounding the indirect impacts of falling behind on personal deadlines, bills and taxes. The economic disruption to our community has a rippling effect for weeks and months even after the power has been re-energized. These costs have a long-term impact that is both quantitative and qualitative in nature.

Accordingly, the City of Grass Valley, City of Nevada City, and the County of Nevada jointly call upon the California Public Utilities Commission for PSPS management guidelines that mitigate the direct and indirect public safety and economic impacts that our residents, businesses, and public agencies have suffered. Regulatory actions need to include specific requirements for electrical utilities to: 1) Ensure cellular and landline communication services are maintained throughout every PSPS event, 2) Provide health and safety amenities, such as access to subsidized generators and oxygen to vulnerable populations and healthcare service providers for each PSPS event, 3) Ensure timely, accurate and consistent communication is provided to all utility customers and community stakeholders to mitigate undue financial hardship to residents and businesses, and 4) Require that PSPS events are targeted as precisely as possible so as to prevent unnecessary power interruption across broad regions. We strongly urge the CPUC to work with City and County partners to develop PSPS best management practices that balance wildfire precautionary efforts with public safety and economic impacts.

Sincerely,

Richard Anderson
Chair, Board of Supervisors
County of Nevada

Lisa Swarthout
Mayor, City Council
City of Grass Valley

Reinette Senum
Mayor, City Council
City of Nevada City