



# CITY OF MOORPARK

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January 26, 2021

**TRANSMITTED ELECTRONICALLY**

California Public Utilities Commission  
Public Advisor  
[Public.Advisor@cpuc.ca.gov](mailto:Public.Advisor@cpuc.ca.gov)

**RE: SCE COMMUNICATIONS FAILURES FOR PUBLIC SAFETY POWER SHUTOFFS**

Dear Commissioners:

Thank you for conducting a public meeting on Southern California Edison's (SCE's) communications failures during Public Safety Power Shutoff (PSPS) outages.

Since inception of the PSPS program, Moorpark has endured numerous, recurring PSPS outages, including multi-day outage events in each of the past two months. In the most recent event of January 19-21, SCE de-energized six of the ten circuits that serve Moorpark, turning off power to 8,362 customers for upwards of 40 hours. That included our largest commercial corridor in the City where many of our businesses are located. Although the City continues to have major problems with the PSPS program generally, SCE's poor communications efforts have exacerbated the problems caused by the outages. This letter summarizes some of the communications problems that I will surely not have sufficient time to share during the CPUC's January 26 hearing on SCE's PSPS communications.

## **SCE Notifications Do Not Accurate Reflect Field Conditions, Are Not Timely**

SCE's communications are not credible, to the point that we cannot rely on SCE notifications to inform our population or our internal operations. SCE routinely sends 'Imminent De-Energization' notices, only to never turn off power. And when outages follow the notices, they usually lag by hours. SCE sends notifications that circuits are de-energized when power is still on. Toward the end of PSPS outages, SCE sends out 'Re-Energization' messages, but power is typically not restored for between one and ten hours, unpredictably.

SCE should send 'Imminent De-Energization' notices only when circuits are going to actually be de-energized and should have a time frame for when that occurs. SCE should send 'Re-Energization' messages with estimated re-energization times, as well as provide intermediate updates as they inspect their lines. SCE now has experience with how long it takes them to

inspect their lines, and SCE should be expected to have the operational intelligence to know where its crews are, what they are inspecting, and when inspections should be completed. Under no circumstances should SCE ever send out incorrect information.

SCE's repeated communications failures have undermined its credibility, to the point that Moorpark residents, businesses, and government cannot rely on SCE's information. In addition to the unnecessary loss of business, food, etc., this means that the City is unable to efficiently mitigate the PSPS impacts on our operations. Without a factual working knowledge of outages and re-energizations, the City wastes resources deploying traffic signal batteries and signage to signalized intersections, switching to generator power, and re-activating traffic signals and streetlights. I would note that PSPS outages also always occur during wind events that already strain City resources due to the high volume of downed tree branches and debris; in such times, operating efficiencies are more critical than ever.

### **SCE Notifications Are Disjointed**

SCE notifications are disjointed and confusing. There appears to be a character limit in text messages that shouldn't apply to text messages. For example, in the most recent PSPS outage, the City received this message:

*Important: SCE to inspect [circuit names] for re-energization. Please...*

As you can see, the operative part of the message was omitted. Additionally, the City receives blank messages such as this:

*SCE Imminent De-Energize Notice for [Circuit Name] in [County Name] (sic)*

This message has no value. Finally, SCE sends conflicting notifications. For example, in the most recent event, the City received 'Re-Energization' messages for the Anton circuit both on January 20 at 4:26 PM and also on January 21 at 7:27 AM. Upon receiving the original message, the City announced the re-energization of the circuit, only to be superseded the next morning, 15 hours later.

SCE needs to develop better quality control with its notifications and include enough information to make them useful and reliable.

### **SCE Interface Shortcomings**

SCE insists on communicating in circuit names, but even years into the PSPS era has no easy way for the public to identify which circuit their home or business is served by. The SCE website has a map to addresses, but it has no circuit names or line maps. SCE does provide PDF maps, but the process to find your circuit is excruciatingly onerous. First, a Moorpark resident would have find and download the list of all circuits serving Ventura County and manually thumb through it to find the ten that serve Moorpark. Then, they'd need to download PDFs for all locations (with no way to just search for them) and, again, manually

search through each to see which one serves their home. Further, SCE frequently communicates in segment numbers, but there are no resources to identify what segment of a circuit is where.

SCE should have a simple website utility where people can type in their address and have their circuit name and segment number provided. SCE should print circuit names and segment numbers on electric bills, so people can refer to them when they hear about their circuits being affected. SCE should also widely advertise a toll-free phone number where people can identify their circuit and segment based on an address.

### **SCE Logistical Shortcomings**

SCE needs to ensure that its staff is responsive to City communications. Moorpark has not received post-event PSPS reports following PSPS outages. SCE further failed to respond to City requests to add City contacts to SCE's notification lists, thus preventing Moorpark's ability to obtain and distribute accurate information. While a simple human error, it does have major impacts on Moorpark's ability to make informed operational decisions and our residents' and businesses' abilities to make informed decisions about their refrigerators, medical devices, communication devices, and general lives.

### **Conclusions**

I am hopeful that the CPUC's examination into SCE's communications failures regarding PSPS outages result in some meaningful change in the SCE communications infrastructure so that people, businesses, and government agencies can rely on SCE to provide accurate, timely information. Their efforts so far have resulted in a significant credibility deficit for SCE that can only be overcome by SCE demonstrating competence. I hope that the information I've shared in this letter will help the CPUC ensure that SCE does so.

Sincerely,



Janice S. Parvin  
Mayor

cc: City Council  
City Manager  
Senator Henry Stern  
Assemblymember Jacqui Irwin