



CITY OF MOORPARK

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March 12, 2021

TRANSMITTED ELECTRONICALLY

The Honorable Ben Hueso, Chair
Senate Committee on Energy, Utilities, and Communications
State Capitol, Room 4035
Sacramento, CA 95814

RE: **SB 533 (Stern) – Letter of Strong Support
Electrical Corporations: Wildfire Mitigation Plans: Deenergization Events:
Microgrids**

Dear Chair Hueso:

This letter expresses the City of Moorpark's formal **strong support** for SB 533 (Stern) to require investor owned utilities (IOUs) to repair their infrastructure to prevent recurring public safety power shutoff (PSPS) outages and to take steps to support the deployment of microgrids across California.

Public Safety Power Shutoff Outages

Since inception of the PSPS program, Moorpark has endured numerous, recurring PSPS outages, most recently multi-day outage events in December 2020 and January 2021. In the most recent event of January 19-21, Southern California Edison (SCE) de-energized six of the ten circuits that serve Moorpark, turning off power to 8,362 customers for upwards of 40 consecutive hours. That included the largest commercial corridor in the City where many of our businesses are located, further damaging our business community already being battered by COVID-19.

Of note, SCE operates a major regional substation in Moorpark, so Moorpark is served by many circuits that extend well beyond the community's boundaries. Typically, the wildfire risk to circuits that serve Moorpark is actually on portions of the circuits further downstream than those within Moorpark. Accordingly, the solution is circuit segmentation, a much easier, cheaper retrofitting approach than undergrounding circuits.

Following SCE's disastrous handling of PSPS outages in 2020 and early 2021, the California Public Utilities Commission (CPUC) ordered SCE officials to attend a hearing to discuss its

poor performance on January 26 and submit a Corrective Action Plan to indicate how they would improve their efforts related to PSPS outages. Moorpark officials provided both verbal and written comments for that hearing. SCE submitted its Corrective Action Plan on February 12, 2021. The first corrective action listed in the Plan is to identify circuits for “expedited hardening” and to improve infrastructure to mitigate the need to include those circuits in future PSPS outages. While this corrective action is appropriate, it is very telling that SCE waited until years into the PSPS era to seriously examine its PSPS prevention responsibilities even as they continued deenergizing circuits with little regard for the effects on communities like Moorpark. Even then, SCE only did so after the CPUC called out SCE for its unacceptable performance.

Even after SCE submitted its Corrective Action Plan, SCE has unfortunately still not operated with transparency or responsiveness in implementing this portion of its own plan. Prior to the Plan’s self-imposed February 19 deadline to identify circuits in scope for consideration for expedited hardening, Moorpark officials asked SCE for its criteria in determining eligibility and if any Moorpark circuits were being considered. After not receiving any information from SCE before the list was supposed to be finalized, City officials have continued to repeatedly request this information from SCE and, to date, have received nothing. Unfortunately, SCE’s lack of follow through in the PSPS space necessitates legislative action to ensure they do so.

SB 533 applies a common sense, easy to understand, and flexible legal standard for SCE and other IOUs to minimize the impacts of PSPS outages. It establishes a clear definition of a circuit that is disproportionately impacted by PSPS outages and offers 12 months for an IOU to mitigate the need to deenergize that circuit. SB 533 also offers IOUs flexibility to determine themselves how it is achieved. Circuit segmentation, wire insulation, undergrounding, and other methods are all available to IOUs, and a reasonable amount of time is provided to achieve them. Indeed, SCE’s own Corrective Action Plan indicated SCE needed one month to develop circuit mitigation plans and six months to construct them. Thus, 12 months should be plenty of time for IOUs to complete mitigation measures.

Support of Microgrid Deployment

Microgrids are a solution to many of California’s energy goals, and facilitating their deployment should be a high priority for the state. Like all local governments, the City of Moorpark is responsible for maintaining critical facilities and infrastructure, including a police station, a CHP station, our municipal operations and Emergency Operations Center, health care facilities, social service facilities, and cooling stations during heat waves. With the prevalence of extended power outages due to PSPS outages, these facilities are under heightened threat of becoming out of service or on limited service based on what emergency generators can power. Development of a microgrid at these types of facilities would ensure that these facilities can be fully powered over extended time frames, thus maintaining critical operations necessary for the safety and welfare of the public we serve.

Insofar as the power generation components of microgrids tend to be from renewable sources such as solar power systems, the proliferation of microgrids will help California reach

its greenhouse gas emissions targets. The addition of these small-scale power generation systems will also help bolster the electricity supply in California, staving off demand for large-scale power plants that are often accompanied by significant environmental impacts. As a concrete example, the City of Moorpark is currently installing a solar/battery system at its Police Department to upgrade its clean power capabilities and make the building more resilient during power outages. The development of a statewide database of critical facilities like ours that are ripe for microgrid investment will serve to connect microgrid investors with sites where there will be sufficient demand, willing partners, and societal benefits.

Further, SB 533 will allow IOUs and community choice aggregators (such as Clean Power Alliance, of which the City of Moorpark is a part) to apply microgrid capacity to their resource adequacy requirements, which will increase the value of microgrids to electricity providers. This will serve to expand the state's renewable energy supply and remove the need for extraneous contingent power purchase contracts.

Taken together, these actions represent necessary next steps to successfully commercialize microgrids in California so Californians can begin receiving the environmental and energy-reliability benefits that microgrid technologies promise.

For these reasons, the City of Moorpark strongly supports SB 533 (Stern).

Sincerely,



Janice S. Parvin
Mayor

cc: City Council
City Manager
Senator Henry Stern
Assemblymember Jacqui Irwin
League of California Cities