

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies,  
Procedures and Rules for Reliability Reporting  
Pursuant to Public Utilities Code Section 2774.1

Rulemaking 14-12-014  
(Filed December 18, 2014)

**OPENING COMMENTS OF THE SOUTH BAY CITIES COUNCIL OF  
GOVERNMENTS REGARDING THE ORDER INSTITUTING RULEMAKING  
REGARDING POLICIES, PROCEDURES AND RULES FOR RELIABILITY  
REPORTING PURSUANT TO PUBLIC UTILITIES CODE SECTION 2774.1**

Jacki Bacharach, Executive Director  
South Bay Cities Council of Governments  
20285 S. Western Ave., Suite 100  
Torrance, CA 90501  
Phone: (310) 371-7222  
Email: [jacki@southbaycities.org](mailto:jacki@southbaycities.org)

January 22, 2015

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**I. INTRODUCTION**

Pursuant to Rule 6.2 of the Commission’s Rules of Practice and Procedure, the South Bay Cities Council of Governments (“SBCCOG”) respectfully submit Opening Comments on the Order Instituting Rulemaking (“OIR”) regarding policies, procedures, and rules for reliability reporting. The SBCCOG urges the California Public Utilities Commission (“CPUC” or “Commission”) to adopt rules which not only meet the letter of Public Utilities Code Section 2774.1, but also the spirit and intent of AB66, the statute which enacted Public Utilities Code Section 2774.1.

**II. BACKGROUND**

The SBCCOG is a joint powers authority with 15 of its member cities<sup>1</sup> within Southern California Edison (“SCE”) territory. For many years, the residents, visitors and businesses in the

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<sup>1</sup> The fifteen SBCCOG member cities within SCE territory include: Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.

SBCCOG jurisdiction have been subject to a great number of planned and unplanned electrical power outages. These outages not only cause inconvenience to the community, but also substantial economic impacts to businesses and residents. Information about the causes, locations and duration of the outages was difficult to obtain from the utility company. The cities were unsuccessful, on their own, in efforts to get SCE to commit to making meaningful improvements to electric facilities serving the cities.

In 2012, several of the SBCCOG member cities enlisted the help of Assemblyman Al Muratsuchi (District 66) to work on the issue at the state level. The result was the introduction and subsequent passage of Assembly Bill 66 by the legislature in 2013.

### **III. COMMENTS**

One of the items identified in the preliminary scope on page 11 of the OIR before the CPUC is to establish “local areas” for reliability reporting. The SBCCOG understands that utilities, such as SCE, do not manage their facilities based on city boundaries. The notice regarding this rulemaking notes that utilities currently aggregate reliability data at the utility district level. According to information provided, SCE has 17 utility districts in their service area. The SCE service area covers approximately 290 jurisdictions<sup>2</sup>. Requiring the utilities to report based on utility districts would not provide the jurisdictions with the information needed to evaluate the performance of the utility company in their jurisdiction.

Neither public agency staff nor most SCE customers have the experience or expertise to read and understand technical reports based on utility district boundaries. It has been the experience of the cities that their citizens come to the cities to act on their behalf in dealing with SCE on reliability

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<sup>2</sup> <https://www.sce.com/wps/wcm/connect/7321bd01-1841-473c-aea2-f948f47bbe7e/SCETerritory.pdf?MOD=AJPERES>

issues. In order to serve our region, the SBCCOG cities need to get the information in a format which makes it possible to have a clear picture of SCE reliability within the cities’ boundaries.

Recently, SCE has started to provide our service area with a city-level report for each of our cities that is informative, on-point, and which addresses each jurisdiction’s need for focused information. These reports are posted to the SCE Reliability Report web page<sup>3</sup>. The SBCCOG commends SCE representatives for committing to continue to provide jurisdictions with these reports, at the city level. In reviewing SCE’s reliability reports for the SBCCOG cities, it was observed that the SAIDI and MAIFI differ at the district level and city level, with certain cities having city-specific SAIDI and SAIFI values exceeding SCE district SAIDI and SAIFI (refer to Tables 1 and 2; bolded items in Table 2 represent cities with SAIDI and SAIFI exceeding SCE district values).

Table 1

*2013 SAIDI and SAIFI by SCE District in SBCCOG Jurisdiction*

<b>2013 District</b>		
<b>SCE District</b>	<b>SAIDI</b>	<b>SAIFI</b>
Compton (Dominguez Hills)	89.17	0.80
South Bay	142.15	1.49

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<sup>3</sup> <https://www.sce.com/wps/portal/home/outage-center/reliability-reports/>

Table 2

*2013 SAIDI and SAIFI by city-level in SBCCOG jurisdiction*

2013 City					
City	City SAIDI	City SAIFI	% over District SAIDI	% over District SAIFI	SCE District
<b>Carson</b>	97.9	0.8	<b>9.8%</b>	0.0%	Compton
El Segundo	101.3	0.7	-28.7%	-53.0%	South Bay
Gardena	114.9	1.2	-19.2%	-19.5%	South Bay
<b>Hawthorne</b>	184.5	1.6	<b>29.8%</b>	<b>7.4%</b>	South Bay
<b>Hermosa Beach</b>	177.9	1.3	<b>25.1%</b>	-12.8%	South Bay
Inglewood	103.8	1.2	-27.0%	-19.5%	South Bay
Lawndale	88.5	1.1	-37.7%	-26.2%	South Bay
<b>Lomita</b>	185.8	1.9	<b>30.7%</b>	<b>27.5%</b>	South Bay
Manhattan Beach	140.7	1.3	-1.0%	-12.8%	South Bay
<b>Palos Verdes Estates</b>	142.2	2.1	0.0%	<b>40.9%</b>	South Bay
<b>Rancho Palos Verdes</b>	167.2	1.8	<b>17.6%</b>	<b>20.8%</b>	South Bay
Redondo Beach	120.0	1.4	-15.6%	-6.0%	South Bay
Rolling Hills	140.9	1.5	-0.9%	0.7%	South Bay
<b>Rolling Hills Estates</b>	154.4	1.8	<b>8.6%</b>	<b>20.8%</b>	South Bay
<b>Torrance</b>	131.5	1.7	-7.5%	<b>14.1%</b>	South Bay

However, if the rulemaking imposes a lesser standard on utilities, there will be the opportunity for the utility to back away from the commitment and revert to strict compliance with the CPUC rule requirements. The SBCCOG believes the report now provided to the cities by SCE should be the standard required in the rulemaking. SBCCOG thinks SCE should be encouraged to strive for the highest standards in providing information to the public in a format most beneficial to the public. SCE has demonstrated that, while difficult, meeting the higher standard is possible.

#### IV. CONCLUSION

The intent of AB 66 and PU Code 2774.1 would best be realized by defining “local area” in such a way as to require SCE and other utilities to provide reliability information by jurisdiction

ITEM IX.A.

rather than or in addition to by utility district. SCE does this now and the SBCCOG recommends that this report template be made the standard when defining “Local Area.”

Respectfully submitted,

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South Bay Cities Council of Governments  
20285 S. Western Ave., Suite 100  
Torrance, CA 90501  
Phone: (310) 371-7222  
Email: [jacki@southbaycities.org](mailto:jacki@southbaycities.org)

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