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#### Technical Committee Meeting Thursday, April 4, 2019 8:30 A.M.

Charles F. McGlashan Board Room, 1125 Tamalpais Avenue, San Rafael, CA 94901
 Mt. Diablo Room, 2300 Clayton Road, Suite 1150, Concord, CA 94520
 City of El Cerrito, 10890 San Pablo Avenue, Hillside Conference Room, El Cerrito, CA 94530
 City of San Ramon, 7000 Bollinger Canyon Road, Room 256, San Ramon, CA 94583

- 1. Roll Call/Quorum
- 2. Board Announcements (Discussion)
- **3.** Public Open Time (Discussion)
- 4. Report from Chief Executive Officer (Discussion)
- Consent Calendar (Discussion/Action)C.1 Approval of 2.7.19 Meeting Minutes
- **6.** MCE Power Supply Overview (Discussion)
- **7.** Legislative Update (Discussion)
- **8.** Committee Matters & Staff Matters (Discussion)
- 9. Adjourn



#### DRAFT

# MCE TECHNICAL COMMITTEE MEETING MINUTES Thursday, February 7, 2019 8:30 A.M.

Mt. Diablo Room, 2300 Clayton Road, Suite 1150 Concord, CA 94520

Charles F. McGlashan Board Room, 1125 Tamalpais Avenue San Rafael, CA 94901

> City of El Cerrito, 10890 San Pablo Avenue El Cerrito, CA 94530

City of San Ramon, 7000 Bollinger Canyon Road, Room 256 San Ramon, CA 94583

#### 1. Roll Call & Quorum

**Present:** Kevin Haroff, City of Larkspur (San Rafael)

Greg Lyman, City of El Cerrito (El Cerrito)
Scott Perkins, City of San Ramon (San Ramon)
Kate Sears, County of Marin (San Rafael)
Ray Withy, City of Sausalito (San Rafael)

**Absent:** Rob Schroder, City of Martinez

Staff

& Others: Jesica Brooks, Board Assistant (San Rafael)

Sherry Clark, Internal Operations Assistant (Concord)

Darlene Jackson, Board Clerk (Concord)

Vicken Kasarjian, Chief Operating Officer (San Rafael)
Taylor Sherman, Internal Operations Assistant (San Rafael)

Shalini Swaroop, General Counsel (San Rafael)

Dawn Weisz, Chief Executive Officer (San Rafael)

Brott Wiley, Customer Programs Manager (San Rafael)

Brett Wiley, Customer Programs Manager (San Rafael)

The regular Technical Committee meeting was called to order by Chair Kate Sears at 8:31 A.M. Quorum was established by roll call.

#### 2. Board Announcements (Discussion)

There were none.

#### **DRAFT**

#### 3. Public Open Time (Discussion)

Committee Chair Sears asked for public comment and there were comments from member of the public, Dan Segedin.

#### 4. Report from Chief Executive Officer (Discussion)

CEO, Dawn Weisz, reported on the following:

- Seven new Board members coming on board and scheduled for orientation on February 27.
- Risk Oversight Committee update.
- Delay in MCE ratesetting due to PG&E bankruptcy and their pending ratesetting.
- There will be no February Board meeting, but we will have a regular Board meeting in March.

#### 5. Consent Calendar (Discussion/Action)

#### C.1 Approval of 11.1.18 Meeting Minutes

Chair Sears opened the public comment period and there were no speakers.

Action: It was M/S/C (Lyman/Withy) to **approve 11.1.18 meeting minutes.** Motion carried by unanimous roll call vote (Absent: Director Schroder).

#### 6. Marin Reach Codes (Discussion)

Alice Zanmiller, Planner, County of Marin, introduced this item and addressed questions from Committee members.

Chair Sears opened the public comment period and there were comments from member of the public, Carleen Cullen.

Action: No action required.

#### 7. EV Charging Update (Discussion)

Brett Wiley, Customer Programs Manager, introduced this item and addressed questions from Committee members.

#### **DRAFT**

Action: No action required.

Chair Sears opened the public comment period and there were comments from members of the public, Kurt Johnson, Carleen Cullen, Howdy Dowdy, and Doug Wilson.

8. CPUC PG&E Safety and Restructuring Proceeding (Discussion)
Shalini Swaroop, General Counsel, and CEO Dawn Weisz, introduced this item and addressed questions from Committee members.
Chair Sears opened the public comment period and there were comments from members of the public, Ken Strong, Kurt Johnson, and Howdy Dowdy.
Action: No action required.
9. Committee Matters & Staff Matters (Discussion)
Chair Sears opened the public comment period and there were no speakers.
Action: No action required.
10. Adjournment
Chair Sears adjourned the meeting at 10:14 A.M. to the next scheduled Technical Committee Meeting on March 7, 2019.
Kate Sears, Chair
Attest:
Dawn Weisz, Chief Executive Officer

#### MCE and its Stakeholders

#### **BALANCING AUTHORITY**

#### **CAISO**

Market Operator
Regulated by FERC
and NERC

#### **SERVICE PROVIDERS**

Scheduling Agent: ZGlobal

Call Center & SQMD Provider: Calpine

**Energy Procurement Consultant**: PEA

Power Contracts Attorney: Steve Hall

## RETAIL ELECTRICITY PROVIDER

#### MCE

Community Choice Aggregator

Load Serving Entity with ~470K customers

Located within CAISO and within PG&E Territory

Governed by Local Board with Rate-setting Authority

#### MCE is not:

Balancing Authority
Utility/IOU
T&D Provider
Generation Owner
IPP/Trading Shop

#### UTILITY

#### PG&E

Transmission & Distribution Owner/Operator

Metering and Billing

Provider of Load Profiles

#### **REGULATORS**

California Public
Utilities Commission

California Energy
Commission

California Air Resource Board

### **MCE Power Supply: Presentation Overview**

#### **WORKFLOW**

Load Forecasting

Multi-year forecast of MCE customer load based on customer counts and consumption patterns, weather and demand-side resources

Resource Planning

Multi-year resource plan to meet renewable, carbon-free, Resource Adequacy requirements and hedging needs

Procurement

Competitive solicitations, bilateral negotiations and standard offer contracts for energy, capacity, attributes and/or hedge value via power purchase agreements

Project Development

Administration of contracts to ensure that all milestones are met for new generating facilities (such as construction, interconnection, and testing for commercial operation)

Bidding & Scheduling

California Independent System Operator ("CAISO")

CAISO Load: week-ahead forecasting and Day-Ahead self-scheduling CAISO Supply: bidding and scheduling into the Day-Ahead and Real-Time markets

Contract Administration

Prudently administering contracts to mitigate risk and ensure the appropriate value of the contract on behalf of MCE's customers.

Settlements

Validation and reconciliation of power deliveries, renewable energy credit transfers and invoice calculations in line with contract terms

Reporting

Compliance reporting: Renewable Portfolio Standard, Resource Adequacy, Integrated Resource Plan, Storage, California Energy Commission Wind, etc.

Process Improvement Develop software to facilitate procurement based on a complete and accurate understanding of MCE's projected load, supply and corresponding risks

### **MCE Power Supply: Primary Responsibilities**

Current Responsibilities	MCE Staff	PEA	Z-Global
Long-Term Load Forecasting		$\checkmark$	
Resource Planning: RPS, GHG-Free, RA, Hedging needs	$\checkmark$	$\checkmark$	
Market Intelligence: forward curves, quotes, valuations, etc.	✓	$\checkmark$	
Market Development: new confirm structures, market outreach	✓		
Procurement & Sales: PPAs & FITs, CFDs, Index+ contracts	✓		
Procurement: Hedge Contracts and RA-Only contracts		$\checkmark$	
Project Development	✓		
CAISO Scheduling: Load and Supply			$\checkmark$
CAISO CRRs: Annual and monthly nominations			$\checkmark$
CAISO Oversight: Market monitoring	$\checkmark$	$\checkmark$	$\checkmark$
Contract Administration	✓		
Contract Settlements: PPAs & FITs, CFDs, Index+ contracts	$\checkmark$		
Contract & CAISO Settlements: Hedge Contracts, RA-Only contracts, CAISO Market Invoices		✓	<b>√</b>
Reporting: compliance reporting, MCE & CalCCA metrics	$\checkmark$	$\checkmark$	
MCE Support: Regulatory, Customer Programs, Public Affairs	✓	$\checkmark$	
Process Improvement: including software development	$\checkmark$		

**Z-Global** 

### MCE Power Supply: Load Forecasting

1	Load	Current Responsibilities	MCE Staff	PEA	Z-C
	Forecasting	Load Forecasting		✓	
2	Resource Planning	<ul><li>What is Load Forecasting:</li><li>Model for understanding MCE's anticip</li></ul>	ated load		
3	Procurement	<u>Timeframe</u> :			
4	Project Development	<ul> <li>10 year outlook (Integrated Resource P</li> <li>1 year outlook (rate setting)</li> <li>Monthly outlook (credit risk policy)</li> </ul>	lan)		
5	CAISO Operations	Day-ahead (scheduling)  How:  A Clabel and DEA models			
6	Contract Administration	<ul> <li>ZGlobal and PEA models</li> <li>Using customer counts</li> <li>Consumption patterns</li> <li>Weather and demand-side resources</li> </ul>			
7	Settlements	• Weather and demand-side resources			
8	Reporting	<ul><li>Challenges:</li><li>Forecasting demand side resources and</li><li>Multiple inclusion periods with differer</li></ul>	<b>.</b>	_	ads
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### MCE Power Supply: Load Forecasting

1 Load Forecasting

Current Responsibilities	MCE Staff	PEA	Z-Global
Load Forecasting		✓	✓

Resource Planning

3 Procurement

Project
Development

5 CAISO Operations

Contract Administration

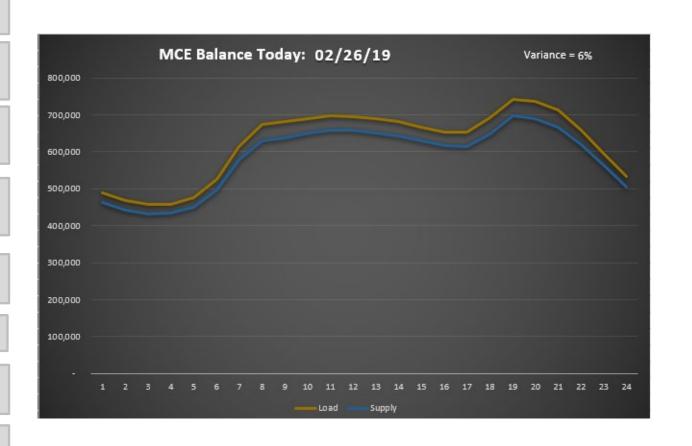
Settlements

6

9

8 Reporting

Process Improvement



### MCE Power Supply: Resource Planning

	3							
1	Load	Current Responsibilities	MCE Staff	PEA	Z-Global			
	Forecasting	Resource Planning	✓	✓				
2	Resource Planning	<ul><li>What is Resource Planning:</li><li>Mapping out MCE's power resource nee</li></ul>	ds, down to tl	ne hour an	d as			
3	Procurement	<ul> <li>much as 10 years in advance</li> <li>Ensuring that MCE will meet Board-approved targets and regulatory requirements, while minimizing expected costs, market and credit risk, and contract settlement complexity</li> </ul>						
4	Project Development							
5	CAISO Operations	What does MCE Procure?  1. Clean Energy 2. Hedges						
6	Contract Administration	<ol> <li>Resource Adequacy</li> <li>CAISO System Power: (MCE's CAISO Load – MCE's Clean Energy)</li> </ol>						
7	Settlements	Challenges:						
8	Reporting	<ul><li>Evolving power supply regulations</li><li>Supplier performance</li></ul>						
9	Process	Load uncertainty						

### MCE Power Supply: **Procurement and Sales**

1	Load	Current Responsibilities	MCE	PEA		
	Forecasting	Market Intelligence: forward curves, quotes, valuations, etc.	$\checkmark$	$\checkmark$		
2	Resource	Market Development: new confirm structures, market outreach	$\checkmark$			
	Planning	Renewable and GHG-free Procurement and Sales	$\checkmark$			
3	RA and Fixed System Hedge Procurement and Sales			$\checkmark$		
4	Project	<ul><li>What is Procurement:</li><li>Meeting MCE's energy and RA targets through formal and informal</li></ul>	mal soli	citations		
5	CAISO Operations	<ul> <li>Timeline:</li> <li>Long-term (10+ years), intermediate (2-10 years) and short-term (&lt;1 year)</li> <li>Monthly contracting: RA and Hedging</li> </ul>				
6	Contract Administration	<ul> <li>How:</li> <li>Determining open positions from Load and Resource Balance model</li> <li>Engaging the market using formal and informal solicitations</li> </ul>				
7	Settlements	<ul> <li>Using standard offer agreements (MCE uses 3 main form contra</li> <li>Negotiating commercial and credit terms</li> <li>Using legal review and internal approval processes</li> </ul>	acisj			
8	Reporting	<u>Challenges</u> :				
9	Process Improvement	<ul> <li>Transparent market intelligence</li> <li>Finding new suppliers and educating them on CCAs and their p needs</li> </ul>	roduct			

### MCE Power Supply: Project Development

			-						
1	Load	Current Responsibilities	MCE Staff	PEA	Z-Global				
	Forecasting	Project Development	✓						
2	Resource Planning	<ul> <li>What is Project Development:</li> <li>Facilitating projects to achieve Commercial Operation under Power Purchase Agreements</li> <li>Managing Contract terms and conditions</li> <li>Milestone monitoring and permitted delay days</li> </ul>							
3	Procurement								
4	Project Development	<ul> <li>Timeline:</li> <li>Related to new construction</li> <li>Based on guaranteed milestones set forth in PPA</li> <li>How:</li> <li>Ensuring that all appropriate milestones have been such as:</li> </ul>							
5	CAISO Operations								
6	Contract Administration	<ul> <li>Permitting</li> <li>Construction Start</li> <li>Interconnection</li> </ul>							
7	Settlements	<ul> <li>Testing and clearance for Commercial Operation by transmission operator, CAISO, and MCE</li> </ul>							
8	Reporting	<ul> <li>Once MCE accepts Commercial Operatio triggered</li> </ul>	n, Delivery Te	rm and pay	/ment				
9	Process	<ul><li><u>Challenges</u>:</li><li>Lack of management tool, all work done</li></ul>	through man	ual system	S				

• Legacy, above-market contracts

### MCE Power Supply: CAISO Market Operations

1	Load	Current Responsibilities	MCE Staff	PEA	Z-Global			
	Forecasting	CAISO Scheduling: Load and Supply			✓			
2	Resource	CAISO CRRs: Annual and monthly nominations			✓			
	Planning	CAISO Oversight: Market monitoring	✓	$\checkmark$	✓			
3	Procurement	<ul><li>What are CAISO Market Operations:</li><li>CAISO Load: week-ahead forecasting and day-</li></ul>		•				
4	Project Development	<ul> <li>CAISO Supply: bidding and scheduling into the day-ahead and real-time markets</li> <li>CAISO Congestion Hedging: annual basis</li> <li>Timeline:</li> <li>Day-ahead for load and supply</li> <li>Year-ahead for Congestion Revenue Rights (CRRs)</li> <li>Month-ahead for CRRs</li> </ul>						
5	CAISO Operations							
6	Contract Administration	How:						
7	Settlements	<ul> <li>ZGlobal as MCE's scheduling agent</li> </ul>						
8	Reporting	<ul><li>Challenges:</li><li>Timeliness and completeness of input data ar processes</li></ul>	nd sophisticat	ion of for	ecasting			
9	Process Improvement	<ul> <li>Alignment between long-term procurement f operations</li> </ul>	orecasting an	d short to	erm market			

### MCE Power Supply: Contract Administration

	Wiel Tower Supply: Contract / tallimistration							
1	Load Forecasting	Current Responsibilities	Law	MCE Staff	PEA	Z-Global		
	Resource	Contract Administration	✓	✓				
2	Planning	What is Contract Administration:						
3	Procurement	Every contract is different!						
/	Project	<ul> <li>Understanding complex contract structures, language and relationships</li> </ul>						
4	Development							
	<ul> <li>Facilitating developing projects through commercial operation</li> <li>Operations</li> <li>Managing disputes, delays and damages</li> </ul>							
5								
6	Contract Administration	<ul> <li>Tracking operations of project, for example:</li> <li>Renewable Energy Credits (RECs) match energy deliveries</li> <li>Tracking invoiced amounts against guaranteed deliveries</li> </ul>						
7	Settlements	<ul> <li>Lead on contract amendments, letter agreements, estoppels, and related documents</li> </ul>						
8	Reporting	<ul> <li>Enforcing credit terms of agreement and working with MCE Finance to ensure collateral is maintained via letter of credit or guarantee.</li> </ul>						
9	Process Improvement	<ul> <li>Maintenance of contract information to support data requests, mitigate liability, and ensure prudent the most value of the contract to MCE's customers</li> </ul>						

### MCE Power Supply: Settlements

		• • •					
1	Load	Current Responsibilities	MCE	PEA	Z-Global		
	Forecasting	Contract Settlements: PPAs & FITs, CFDs, Index+contracts	✓				
2	Resource Planning	Contract & CAISO Settlements: Hedge Contracts, RA-Only contracts, CAISO Market Invoices		✓	✓		
3	Procurement	Milestana Cathlana anta					
4	Project Development	<ul> <li>What are Settlements:</li> <li>CAISO Settlements: payments for load and other market participation charges</li> <li>Contract Settlements: validation and reconciliation of power deliveries, Renewab Energy Credit (REC) transfers and invoice calculations in line with contract terms</li> </ul>					
5	CAISO Operations	<ul><li>How:</li><li>CAISO Settlements: ZGlobal and PEA perform daily</li></ul>	/ analysis	s and valid	ation.		
6	Contract Administration	<ul> <li>Reviewed with MCE on a weekly basis.</li> <li>Contract Settlements: validation of energy invoice validated by MCE Contract Managers</li> </ul>	s from c	ontract su	ppliers is		
7	Settlements	<u>Timeline:</u> • Weekly and monthly					
0	Poporting						

#### Challenges:

- Complex legacy settlement structures
- Manual tracking of volumes, RECs and deliveries

### MCE Power Supply: Reporting

1	Load	Current Responsibilities	MCE	PEA	ZGlobal		
	Forecasting	Reporting: compliance reporting, MCE & CalCCA	$\checkmark$	$\checkmark$			
2	Resource	MCE Support: Regulatory, Customer Programs, PA	$\checkmark$	$\checkmark$			
	Planning	What are MCE's Reporting Obligations:					
3	Procurement	<ul> <li>Renewable Portfolio Standard (CPUC &amp; CEC)</li> <li>Resource Adequacy (CPUC, CEC &amp; CAISO)</li> <li>Integrated Resource Plans (MCE and CPUC)</li> </ul>					
4	Project	PSD (Power Source Disclosure - CEC)					
	Development	GHG Reporting (CARB)      IFRD (Integrated Fourty Policy Report CFG)					
5	CAISO Operations	<ul> <li>IEPR (Integrated Energy Policy Report – CEC)</li> <li>Retails Sales Reporting (Energy Information Administration - EIA)</li> <li>Ad Hoc Data requests</li> </ul>					
6	Contract Administration	<u>Timeline</u> : Monthly, annually					
7	Settlements	How: Using manually updated spreadsheets					
8	Reporting	Challenges:					
8	Process Improvement	<ul><li>Lack of database of information</li><li>Changing rules and regulations</li><li>Ability to backfill</li></ul>					

### MCE Power Supply: Process Improvements

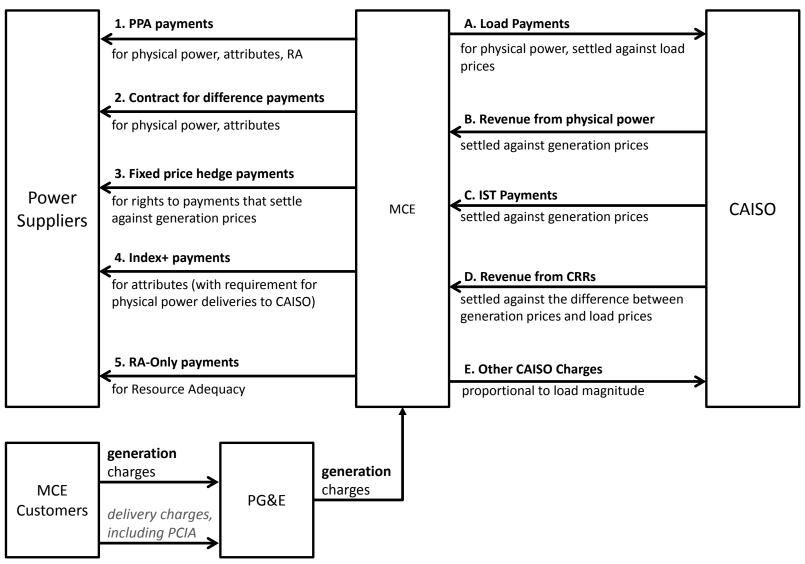
Continuous improvement mindset of team

1	Load	<b>Current Responsibilities</b>	MCE Staff	PEA	Z-Global		
	Forecasting	Process Improvement: including	✓				
2	Resource	software development					
	Planning						
		What are Process Improvements:					
3	Systems and software to support Power Resources in its contract many and software to supp						
		portfolio management					
4	Project						
	Development Key opportunities identified:						
	Bidding &	Software that enables     Swift development of compliance.	ranarts				
5	Scheduling	<ul> <li>Swift development of compliance reports</li> <li>Oversight of contracts to mitigate risk and ensure all appropriate terms,</li> </ul>					
		conditions and milestones are met		an appropriate			
6	Contract	Analysis of existing energy portfoli	· · ·	en positions, ar	nd how to		
	Administration						
7	Settlements	<ul><li>Load modification analysis and its</li><li>Load Forecasting</li></ul>	effect off flourly	energy gross n	iaigiii		
/	Settlements	Ŭ					
8	Poporting	How:					
0	Reporting	Request for Proposals from software v	endors to meet	contract manag	gement		
		and portfolio management needs					

Process

9

### MCE Power Supply: Financial Overview





MARIN COUNTY | NAPA COUNTY | UNINCORPORATED CONTRA COSTA COUNTY
BENICIA | CONCORD | DANVILLE | EL CERRITO | LAFAYETTE | MARTINEZ | MORAGA
OAKLEY | PINOLE | PITTSBURG | RICHMOND | SAN PABLO | SAN RAMON | WALNUT CREEK

March 21, 2019

The Honorable Senator Hueso Chair, Senate Energy & Utilities Committee State Capitol, Room 4035 Sacramento, CA 95814

Re: SB 255 (Bradford) — Support

Dear Chairman Hueso,

On behalf of Marin Clean Energy (MCE), I write in support of SB 255, which will encourage supplier diversity efforts from a number of energy market participants, including Community Choice Aggregators (CCAs). MCE is a local government agency that provides electricity generation services to over 470,000 customers in Marin, Napa, Contra Costa, and Solano counties. MCE supports both the top-down supplier diversity efforts envisioned by Assemblymember Gwen Moore in AB 3678 (1986) as well as additional bottom-up workforce development opportunities for disadvantaged communities.

MCE is a proud supporter of supplier diversity. MCE's Sustainable Workforce and Diversity Policy prioritizes sustainable workforce opportunities, local economic sustainability, and diversity inclusion through contracting and agency initiatives. MCE currently requests contractors voluntarily disclose their General Order (GO) 156 certification status and their efforts to work with DBEs for power purchase agreements, Feed-in-Tariffs, customer programs, and new contractors. From these requests, MCE found that 23% of its respondents self-identify as certified under GO 156 or use subcontractors that are certified. MCE also found that 100% of respondents with labor-related jobs pay prevailing wage. 77% of respondents have initiatives in place to promote diversity, and 45% of respondents support or use apprenticeship programs.

In January 2018, MCE, the Greenlining Institute, and the California Community Choice Association (CalCCA) jointly convened a CCA Supplier Diversity Symposium. The symposium hosted dignitaries such as Senator Nancy Skinner, former Senator Ricardo Lara, Commissioner Rechtschaffen, former Commissioner Peterman, program administrators, and participants who have benefited from these workforce development opportunities supported by MCE.

As recently as March 7, 2019, MCE held a "Certify & Amplify" workshop at its Concord office. MCE hosted 50 business owners and CPUC supplier diversity staff to explain the certification process for the clearinghouse and to provide more information about the GO 156 program.

In addition to top-down supplier diversity efforts, MCE also supports bottom-up workforce development efforts. MCE Solar One is a 10.5 MW solar project located at the Chevron refinery in Richmond. The project was built with a 50 percent local hire requirement in a diverse

CONCORD OFFICE: 2300 Clayton Road, Suite 1150, Concord, CA 94520
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mceCleanEnergy.org

community with high unemployment rates and many underserved and marginalized communities. Local non-profit partner RichmondBUILD trained multiple cohorts of students to work on the project. MCE invested time and funds in training over a two year period before breaking ground on the project in order to ensure access to the jobs by a wide range of local residents. The project also hired union workers from the United Brotherhood of Carpenters and Joiners of America (UBC) and Laborers Union (Local 152); International Brotherhood of Electrical Workers (IBEW) (Local 302); IBEW (Local 1245); Laborers Union (Local 324); Operating Engineers (Local 3) and Steamfitters (Local 342).

In Contra Costa County, MCE has partnered with nonprofit partner, Rising Sun Energy Center, to train local youth to provide no-cost energy savings and water assessments in the Cities of Richmond, El Cerrito, and San Pablo. MCE has also worked with nonprofit partner RichmondBUILD to train students with construction, numeracy, and literacy skills, later connecting them with related jobs for large scale solar installation and an LED streetlight retrofit project in Richmond. In Pittsburg (ranking 85-95% percentile in CalEnviroScreen 3.0), MCE helped coordinate the presence of a new call center, then partnered with Future Build East County and Calpine to train students on call center basics, call handling, energy data and more. Graduates were offered positions at the new call center. Finally, MCE has recently been approved for an additional \$2.24 million for workforce development activities for 2019 through 2025.

In Marin County, MCE has partnered with the Marin City Community Development Corporation (MCCDC) since 2012 to train at least 62 disadvantaged community members and connect them to solar installation and energy efficiency jobs.

MCE is proud to demonstrate its robust support for diversity efforts through all aspects of the workforce and applauds Senator Bradford's leadership on this issue.

Sincerely,

Shalini Swaroop

General Counsel, MCE

Shalini Gusorosp



March 21, 2019

The Honorable Senator Dodd State Capitol, Room 4032 Sacramento, CA 95814

Re: SB 167 (Dodd)—Support

Dear Senator Dodd.

On behalf of MCE Clean Energy, I write in support of SB 167, which would require wildfire response protocols to include impacts on critical first responders, customers enrolled in the California Alternative Rates for Energy (CARE) program, and medical baseline customers.

The importance of including protocols for these vulnerable individuals cannot be understated because for many, it could be a matter of life or death. MCE serves customers who depend upon safe and reliable electricity to power their life-support equipment. By including protocols that account for the safety of these individuals during wildfire events, this bill shares our values of providing customers with safe and reliable electricity to those who need it, without jeopardizing the safety of other customers.

This bill also takes into account protocols for keeping first responders safe during potential wildfire events. These events can create numerous hazards to critical first responders, so it is imperative to establish protocols such as preemptively deenergizing powerlines in high-risk areas that could prove to be life-threatening during rescue and recovery operations.

MCE appreciates the opportunity to weigh in on this piece of legislation and urges your support. If you have any questions, feel free to contact me at (415) 464-6040.

Sincerely,

Shalini Swaroop

General Counsel, MCE