



## 2023 PUBLIC SAFETY POWER SHUTOFF (PSPS) TABLETOP EXERCISE

April 11, 2023



**WELCOME REMARKS**

# Administrative Remarks

- Attendance and registration
- Cell phone and microphone etiquette
- Utilize plain language

# Safety Message

- Evacuation and safety information
- Exercise Safety
  - “Pause Ex” and “Real World”

# Schedule

TIME	TOPIC	FACILITATOR
7:30 – 7:45	Player Arrival and Check-In	N/A
8:00 – 8:15	Welcome/Introductions	SDG&E
8:15 – 8:30	Exercise Overview	Prestige
8:30 – 9:45	Module One	SDG&E
9:45 – 10:00	Break	N/A
10:00 – 11:00	Module Two	SDG&E
11:00 – 11:45	Module Three	SDG&E
11:45 – 12:00	Hotwash/Closing Remarks	All
Post Event	Networking Lunch and Tour	All



## OPENING REMARKS





## EXERCISE OVERVIEW

# Exercise Overview



- **Scope:** Four-hour, in-person, discussion-based exercise
- **Purpose:** The purpose of this exercise is to test internal SDG&E participants' understanding of Emergency Operation Center (EOC) activities during a PSPS activation and how internal and external stakeholder coordination and communication will occur
- **Structure:** Plenary, module structure
- **Scenario:** PSPS event



# Exercise Objectives

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1. **Enhance** participants' knowledge and understanding of SDG&E's PSPS procedures in accordance with SDG&E's Wind/PSPS ConOps Annex.
2. **Demonstrate** an understanding of effectively implementing PSPS operations in alignment with SDG&E's PSPS plans, policies, and procedures.
3. **Identify** and discuss the critical services, interdependencies, and expectations of both internal and external stakeholders during PSPS operations.
4. **Discuss** the communication and coordination protocols both internal and between SDG&E and external stakeholders.

# Exercise Guidelines and Assumptions



- This exercise will be held in an open, no-fault environment.
- Respond to the scenario using your knowledge of current plans and capabilities, and insights derived from your training and past activation experience
- Attendees should consider their real-life roles and experience when examining proposed topics, interacting with other attendees, offering observations to the forum, and discussing strategic and tactical decisions.
- Issue identification is not as valuable as suggestions and recommended actions that could improve processes moving forward. Problem-solving efforts should be the focus.
- This exercise is an opportunity to discuss and present multiple options and possible solutions that can inform pertinent plans, policies, and procedures.
- The exercise scenario is plausible, and events occur as presented.
- This exercise will include jumps in time to ensure SDG&E can cover various response phases of a PSPS event. The facilitator will identify when these time jumps occur.
- Please use plain language and refrain from acronyms and technical terminology.



**MODULE ONE:  
STAGE 1: ACTIVATING PSPS  
PROTOCOLS/POTENTIAL TO DE-ENERGIZE**

# Module One: Pre-Scenario Update Discussions (-72 HRS)

1. Before we go into the specific scenario, can you provide an overview of the general forecasting that is done and how it is determined that PSPS protocols may need to be activated?
  - a. How is this information communicated and how is a decision made to activate PSPS Protocols?
  - b. What factors do you consider in determining whether or not to activate PSPS Protocols?
  - c. What preparedness activities occur from decision to activate PSPS Protocols up to the 72-hour mark?

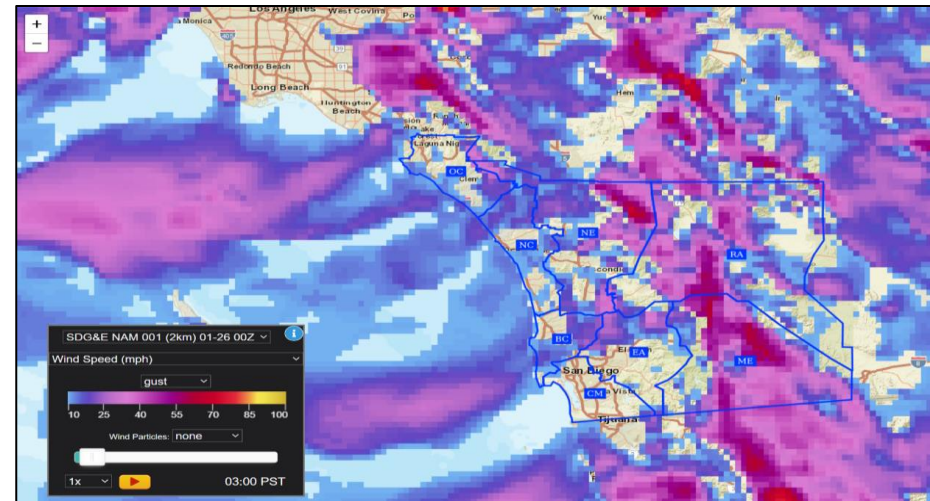
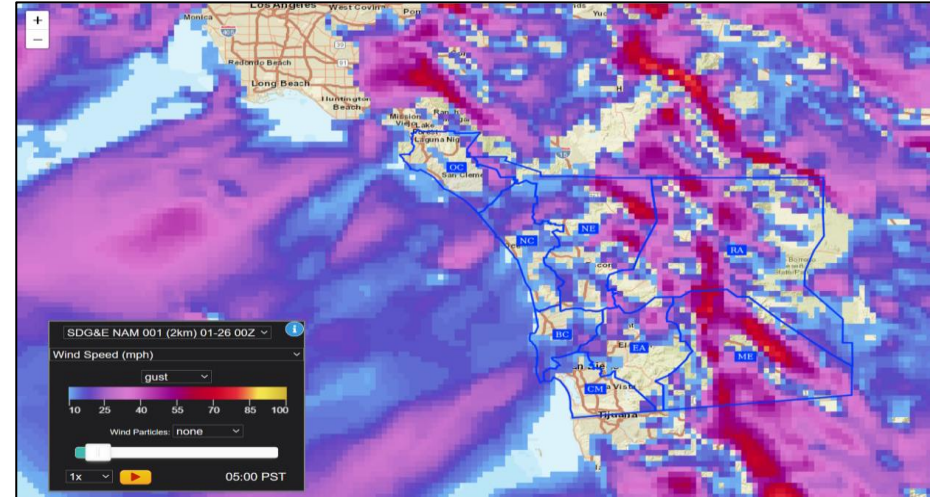
# Module One Exercise Scenario (-72 HRS)

## SCENARIO OVERVIEW

It is currently 72 hours in advance of an anticipated PSPS event. SDG&E is in Stage 1 of their PSPS response.

## WEATHER UPDATE

- Winds for this scenario were based on real world conditions that occurred during a strong Santa Ana wind event on January 26, 2023.
- Forecast models in advance of the event indicated that winds would surface in a mountain wave pattern. Such events are known for producing strong winds that occur outside of the “typical” Santa Ana wind footprint and are notoriously difficult to forecast.



**EXERCISE USE ONLY**



# Fire Potential Index (-72 HRS)

	Sat 4/08	Sun 4/09	Mon 4/10	Tue 4/11	Wed 4/12	Thu 4/13	Fri 4/14
ME	Elevated 13	Elevated 13	Elevated 14	Extreme 16	Elevated 14	Elevated 14	Elevated 14
RA	Elevated 13	Elevated 13	Elevated 14	Extreme 16	Elevated 14	Elevated 14	Elevated 14
EA	Elevated 13	Elevated 13	Elevated 13	Extreme 15	Elevated 14	Elevated 14	Elevated 13
NE	Elevated 13	Elevated 13	Elevated 13	Extreme 15	Elevated 14	Elevated 14	Elevated 13
OC	Normal 11	Elevated 12	Elevated 13	Extreme 15	Elevated 14	Elevated 13	Elevated 12
NC	Normal 11	Normal 11	Elevated 13	Extreme 15	Elevated 13	Elevated 12	Normal 11
BC	Normal 11	Normal 11	Elevated 13	Extreme 15	Elevated 13	Elevated 12	Normal 11
CM	Normal 11	Normal 11	Elevated 13	Extreme 15	Elevated 13	Elevated 12	Normal 11

EXERCISE USE ONLY



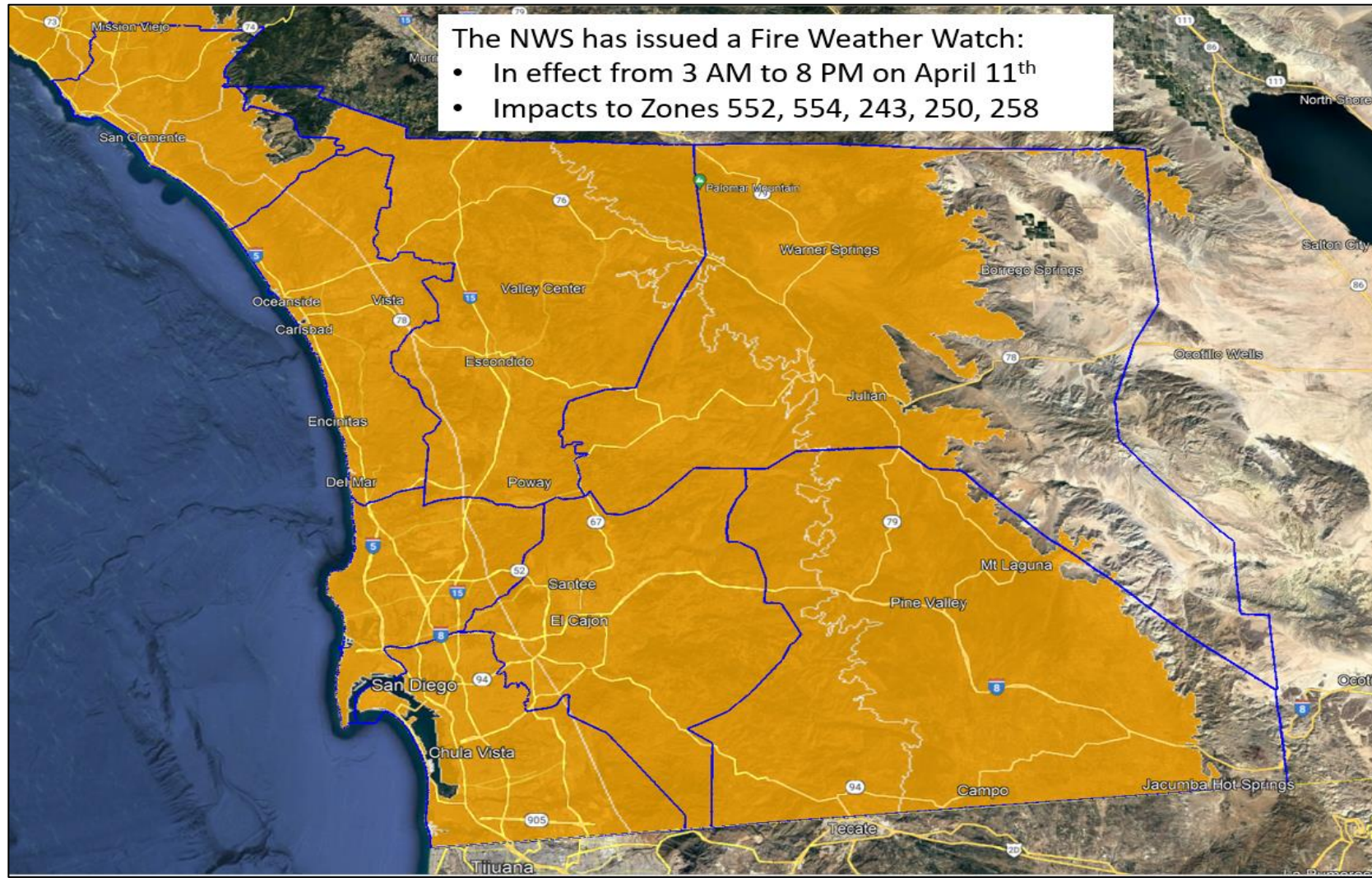
# Red Flag Warning (-72 HRS)

<div>SANTA ANA WILDFIRE THREAT INDEX</div>					
Zones	Sat/Apr 8	Sun/Apr 9	Mon/Apr 10	Tue/Apr 11	
Zone 1: LA-Ventura					
Zone 2: Orange-Inland Empire					
Zone 3: San Diego					
Zone 4: Santa Barbara					

NO RATING	Winds are either not expected, will not contribute to significant fire activity.
MARGINAL	Upon ignition, fires may grow rapidly.
MODERATE	Upon ignition, fires will grow rapidly and will be difficult to control.
HIGH	Upon ignition, fires will grow very rapidly, will burn intensely, and will be very difficult to control.
EXTREME	Upon ignition, fires will have extreme growth, will burn very intensely, and will be uncontrollable.

EXERCISE USE ONLY

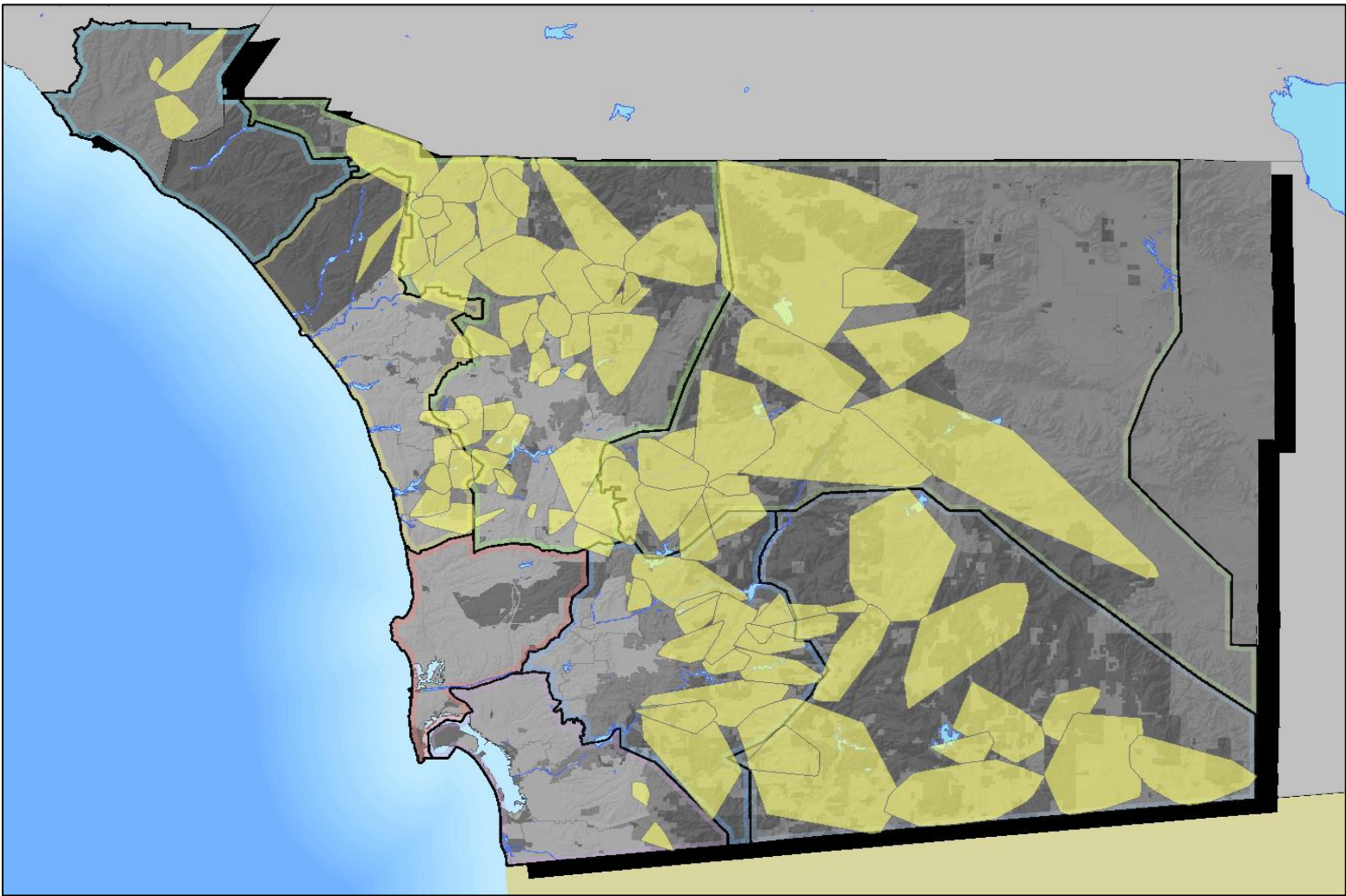
# NWS Product (-72 HRS)



**EXERCISE USE ONLY**



# GIS Potential Areas for PSPS (-72 HRS)



Info Summary			96
Planned Public Safety Power Shutoff			
Total Customers:		116754	
Total Medical Baseline (MBL):		8723	
Total Life Support (LS):		5724	
Total Critical Facilities:		3192	

EXERCISE USE ONLY

# Communities Potentially Impacted

**#40+ communities could potentially be impacted, including:**

- Aguanga
- Aliso Viejo
- Alpine
- Bonita
- Boulevard
- Camp Pendleton
- Campo
- Cardiff
- Carlsbad
- Chula Vista
- Dana Point
- Del Mar
- Descanso
- Dulzura
- El Cajon
- Encinitas
- Escondido
- Fallbrook
- Granite Hills
- Imperial Beach
- Jacumba
- Jamul
- Julian
- La Jolla
- Laguna Beach
- Laguna Hills
- Laguna Niguel
- Lakeside
- Mission Viejo
- Mount Laguna
- National City
- Nestor
- Oceanside
- Pala
- Palomar Mountain
- Pauma Valley
- Peñasquitos
- Pine Valley
- Potrero
- Poway
- Ramona
- Ranchita
- Rancho Bernardo
- Rancho Santa Fe
- San Clemente
- San Diego
- San Juan Capistrano
- San Marcos
- Santa Ysabel
- Santee
- Solana Beach
- Valley Center
- Vista
- Warner Springs

# Module One Discussion Questions (-72 HRS)

## Operational Considerations

1. Electric Operations, please discuss your overarching responsibilities during Stage 1 of PSPS operations, at the 72-hour mark.
2. Officer in Charge, what are your main concerns and considerations at this point in the scenario?

## Notifications/ Communications

1. What information is being provided to customers and the general public at this stage in the operation?
2. Which public safety partner or regulatory notifications need to be made in this stage and what type of information is included at the 72-hour mark?
3. Can you discuss what tools are available for public safety partners to receive notifications and information about the potential PSPS at this stage?
4. Are the current notifications and communications discussed by SDG&E adequate for your organization to establish situational awareness/common operating picture?

## Customer Programs/Services

1. What outreach occurs for Access and Functional needs at the 72-hour mark and how do we ensure that we maintain coordination?
  - a. What if any changes or improvements have been made for the upcoming season in AFN coordination and response?

# Module One Exercise Scenario (-48 HRS)

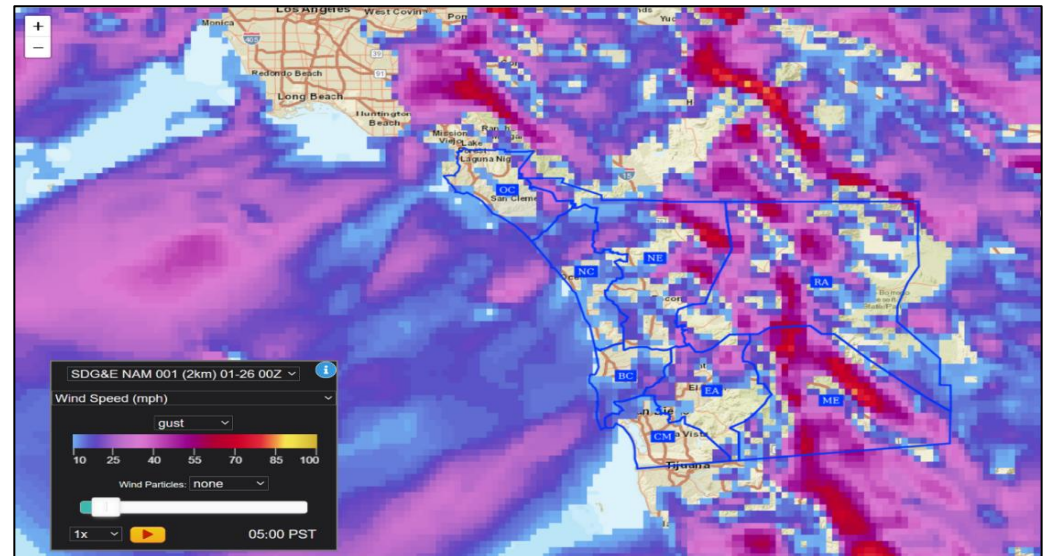
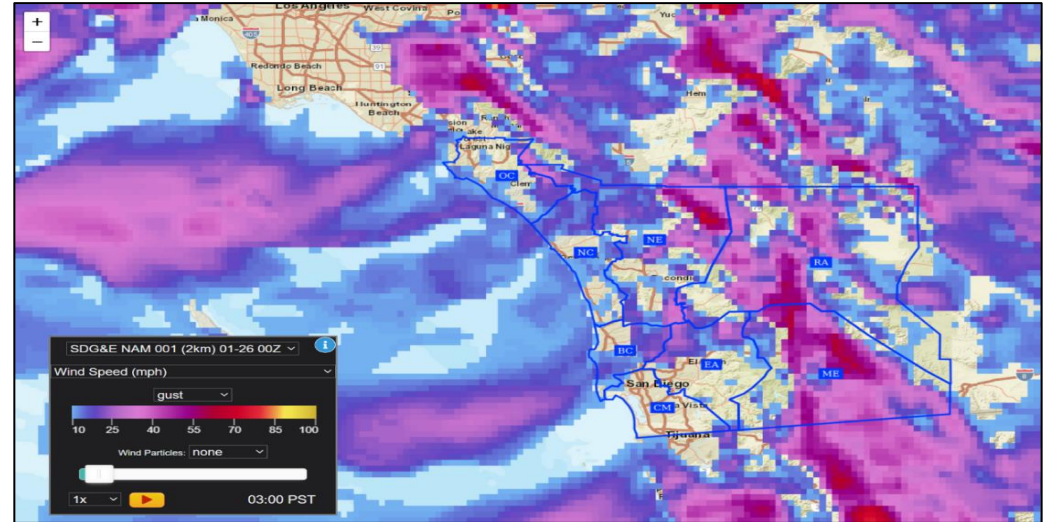
## SCENARIO UPDATE

It is currently 48 hours in advance of an anticipated PSPS event. SDG&E is in Stage 1 of their PSPS response.

## WEATHER UPDATE

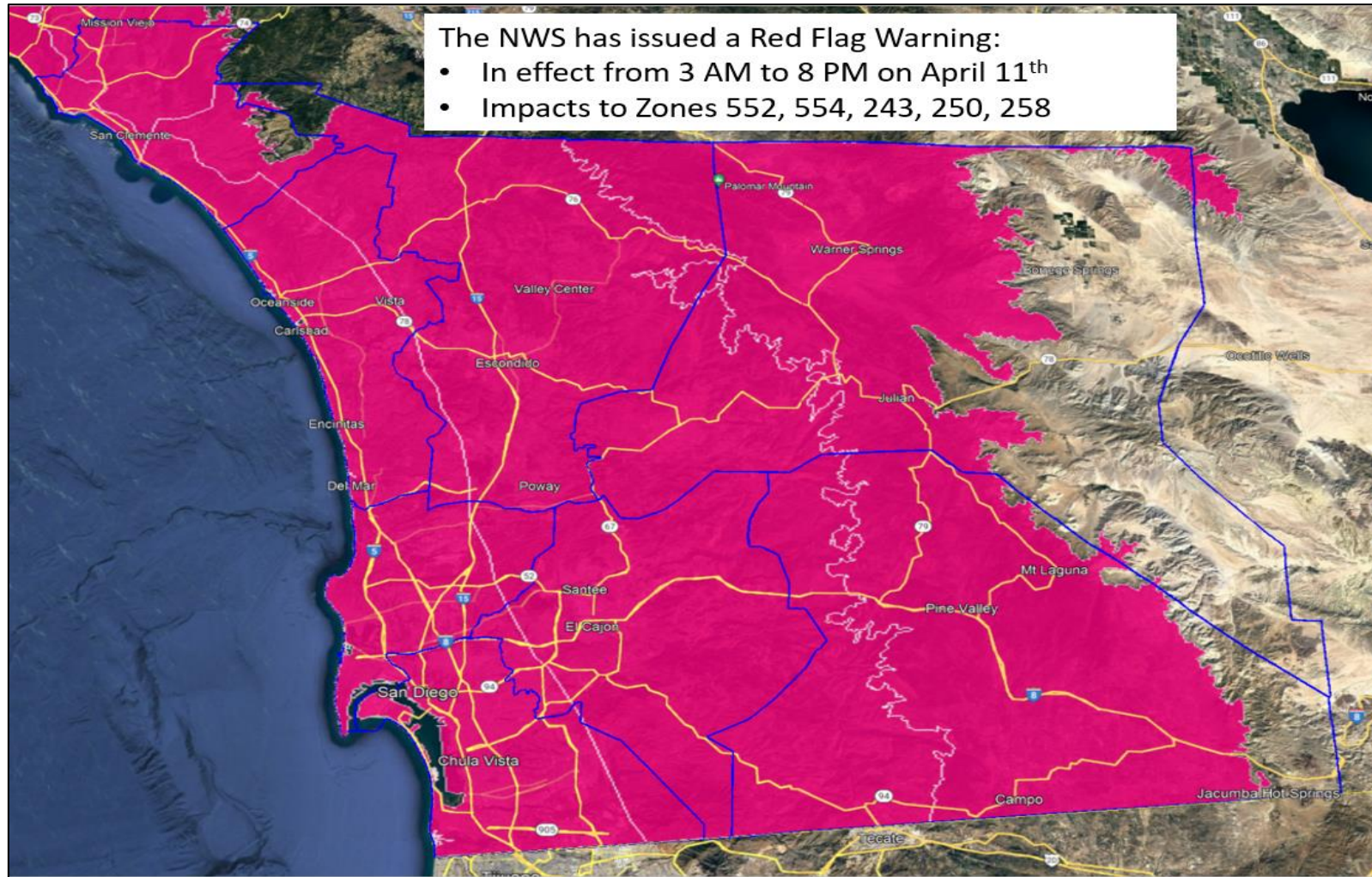
- Forecast models in advance of the event indicated that winds would surface in a mountain wave pattern. Such events are known for producing strong winds that occur outside of the “typical” Santa Ana wind footprint and are notoriously difficult to forecast.
- Meteorology: Could you please give us a brief overview of the forecast, threats, and risk at this stage of the scenario?

**EXERCISE USE ONLY**





# NWS Product (-48 HRS)



**EXERCISE USE ONLY**

# Fire Potential Index (-48 HRS)

	Sun 4/09	Mon 4/10	Tue 4/11	Wed 4/12	Thu 4/13	Fri 4/14	Sat 4/15
ME	Elevated 13	Elevated 14	Extreme 16	Elevated 14	Elevated 14	Elevated 14	Elevated 14
RA	Elevated 13	Elevated 14	Extreme 16	Elevated 14	Elevated 14	Elevated 14	Elevated 14
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BC	Normal 11	Elevated 13	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11
CM	Normal 11	Elevated 13	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11

EXERCISE USE ONLY

# Red Flag Warning (-48 HRS)

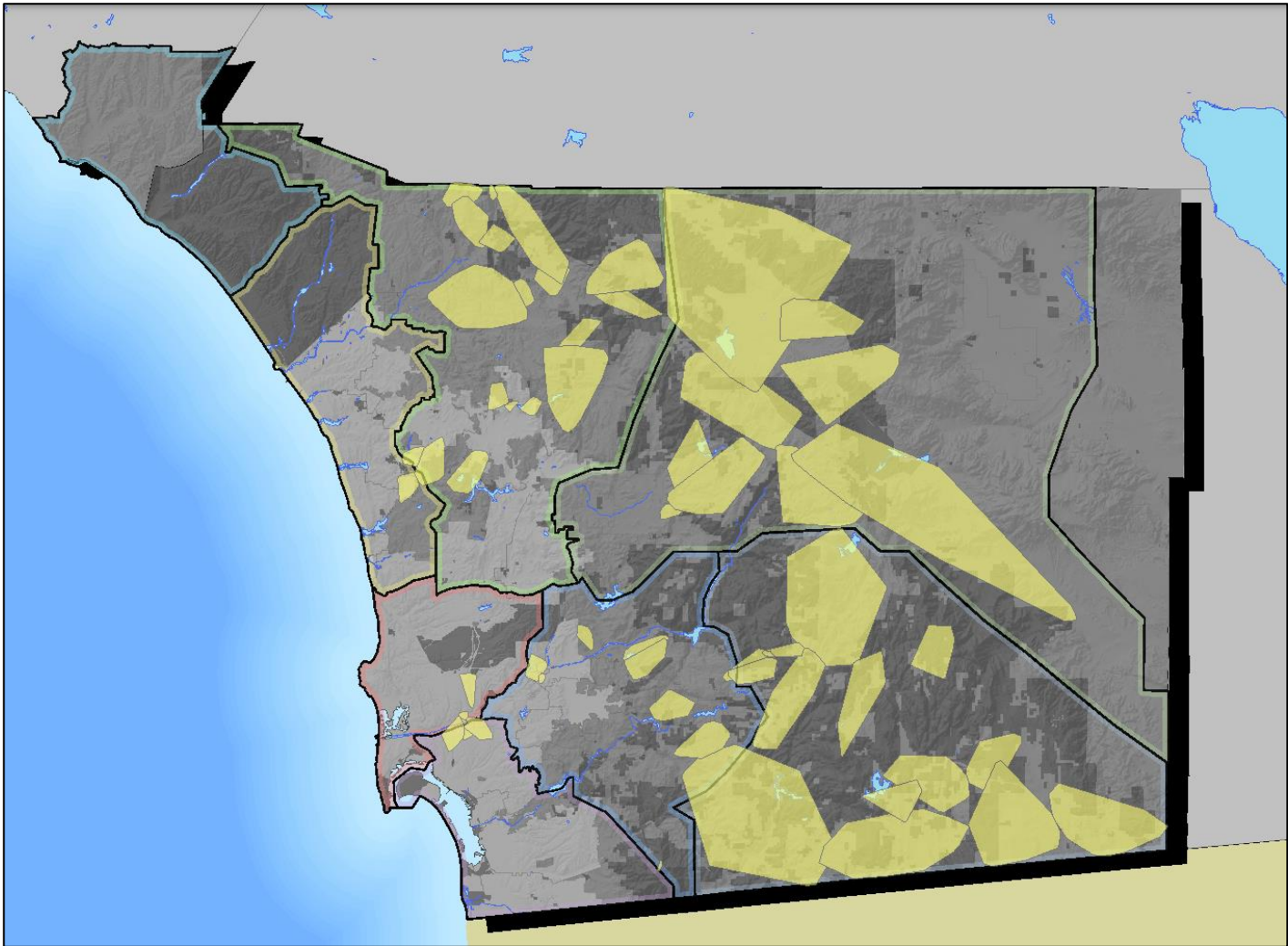
SANTA ANA WILDFIRE THREAT INDEX				
Zones	Sun/Apr 9	Mon/Apr 10	Tue/Apr 11	
Zone 1: LA-Ventura				
Zone 2: Orange-Inland Empire				
Zone 3: San Diego				
Zone 4: Santa Barbara				


NO RATING	Winds are either not expected, will not contribute to significant fire activity.
MARGINAL	Upon ignition, fires may grow rapidly.
MODERATE	Upon ignition, fires will grow rapidly and will be difficult to control.
HIGH	Upon ignition, fires will grow very rapidly, will burn intensely, and will be very difficult to control.
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EXERCISE USE ONLY



# GIS Potential Areas for PSPS (-48 HRS)



Info Summary			⌵	✕
	Planned Public Safety Power Shutoff	60		
Total Customers:		54406		
Total Medical Baseline (MBL):		3086		
Total Life Support (LS):		2030		
Total Critical Facilities:		1675		

EXERCISE USE ONLY

# Module One Discussion Questions (-48 HRS)

## Operational Considerations

1. Meteorology, can you discuss the changes in the forecast from 72 to 48 hours, and what types of information is now available to responders for more detailed planning?
2. OIC, what are your main concerns and considerations at this point in the response?

## Notifications/Communications

1. How does this updated circuit list impact public safety partner notifications?
  - a. Please describe what data is now available on the public safety partner portal and how public safety partners access it.
2. Public safety partners, how is this information provided by SDG&E regarding the potential PSPS impacted communities utilized by your jurisdiction?
  - a. How can public safety partners discuss any questions or concerns they may have at this stage of the response with SDG&E?
3. Customer notifications begin at this point in the response, please provide an overview of what notifications are provided to customers and via what means?
4. How is this more targeted list of impacted communities provided to the general public?

# Module One Discussion Questions (-48 HRS) – Cont'd

## Customer Programs/Services

1. What customer programs/services is SDG&E implementing at this stage, to include support for AFN and medical baseline customers?
  - a. How does outreach to AFN Customers occur?
2. What level of support is provided by AFN partners and what actions would you be taking at this stage?



# Module One Discussion Questions (-48 HRS) – Cont'd

## Operational Impacts

1. San Diego County, can you please discuss your posture at 48 hours before an expected PSPS, what coordination occurs with jurisdictions, and what information you would need from SDG&E?
2. This incident is projected to potentially involve Tier 2 communities that don't often fall within a potential PSPS scope such as City of San Diego. What would jurisdictions that don't typically fall within the PSPS scope do at this stage to prepare? What if any additional resources or support would you need from SDG&E, SD County, or other entities?

## PSPS Tools/Technology

1. What GIS and mapping products are available at this stage and how are they shared with public safety partners?

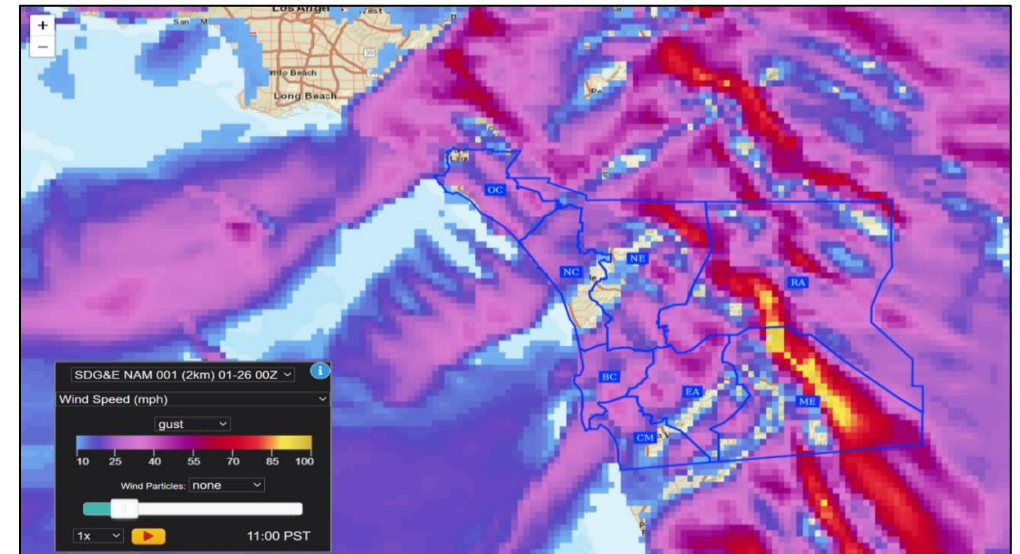
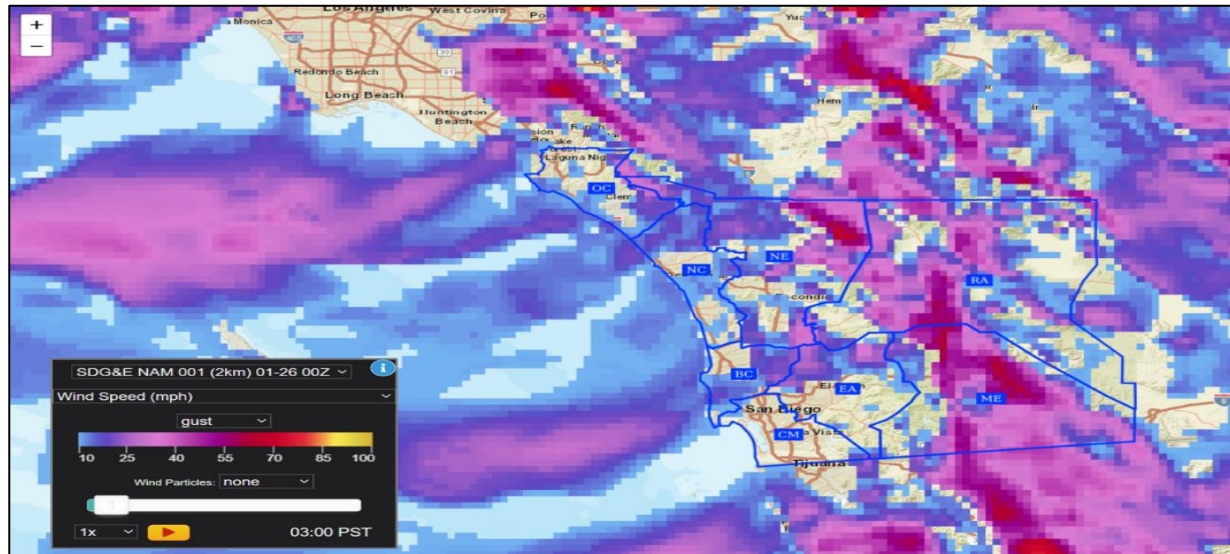
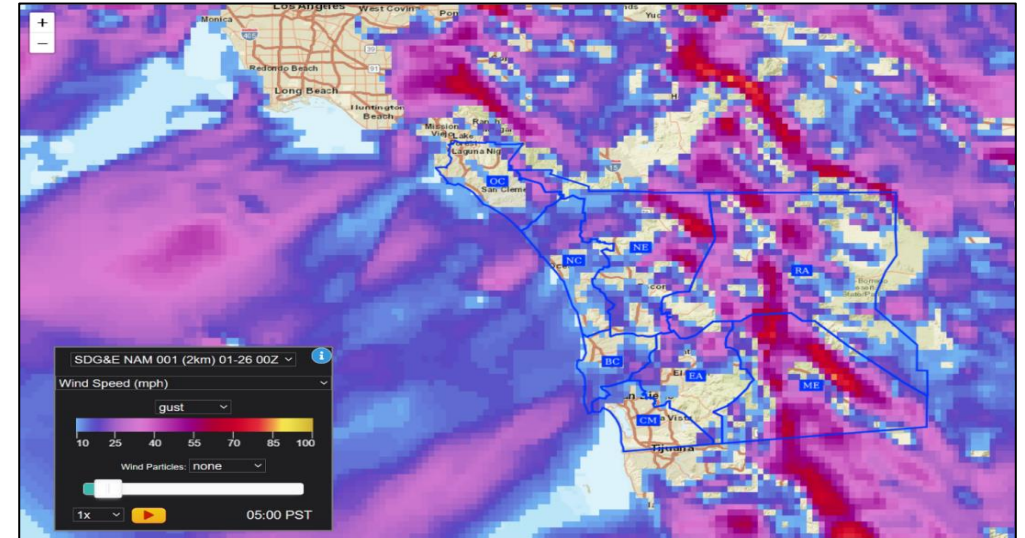
# Module One Exercise Scenario (-24 HRS)

## SCENARIO UPDATE

It is currently 24 hours in advance of an anticipated PSPS event. SDG&E is in Stage 1 of their PSPS response.

## WEATHER UPDATE

- Forecast models in advance of the event indicated that winds would surface in a mountain wave pattern. Such events are known for producing strong winds that occur outside of the “typical” Santa Ana wind footprint and are notoriously difficult to forecast.
- Meteorology: Could you please give us a brief overview of the forecast, threats, and risk at this stage of the scenario?



EXERCISE USE ONLY

# Fire Potential Index (-24 HRS)

	Mon 4/10	Tue 4/11	Wed 4/12	Thu 4/13	Fri 4/14	Sat 4/15	Sun 4/16
ME	Elevated 14	Extreme 16	Elevated 14	Elevated 14	Elevated 14	Elevated 14	Elevated 12
RA	Elevated 14	Extreme 16	Elevated 14	Elevated 14	Elevated 14	Elevated 14	Elevated 12
EA	Elevated 13	Extreme 16	Elevated 14	Elevated 13	Elevated 13	Elevated 13	Elevated 12
NE	Elevated 13	Extreme 16	Elevated 14	Elevated 13	Elevated 13	Elevated 13	Elevated 12
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BC	Elevated 13	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11	Normal 11
CM	Elevated 13	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11	Normal 11

**EXERCISE USE ONLY**

# Red Flag Warning (-24 HRS)

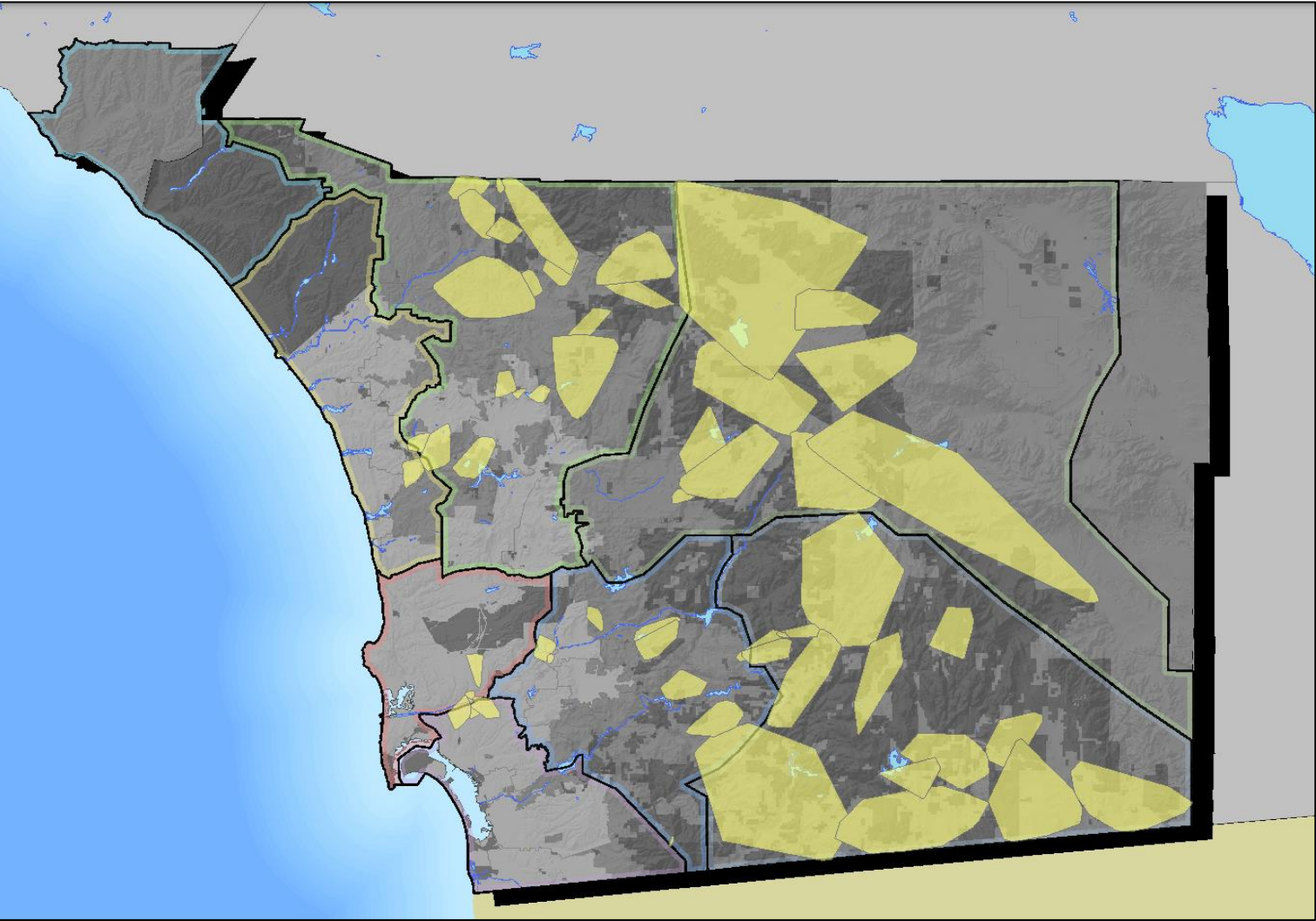
SANTA ANA WILDFIRE THREAT INDEX		
Zones	Mon/Apr 10	Tue/Apr 11
Zone 1: LA-Ventura		
Zone 2: Orange-Inland Empire		
Zone 3: San Diego		
Zone 4: Santa Barbara		


NO RATING	Winds are either not expected, will not contribute to significant fire activity.
MARGINAL	Upon ignition, fires may grow rapidly.
MODERATE	Upon ignition, fires will grow rapidly and will be difficult to control.
HIGH	Upon ignition, fires will grow very rapidly, will burn intensely, and will be very difficult to control.
EXTREME	Upon ignition, fires will have extreme growth, will burn very intensely, and will be uncontrollable.

EXERCISE USE ONLY



# GIS Potential Areas for PSPS (-24 HRS)



Info Summary			⌵	✕
	Planned Public Safety Power Shutoff	60		
Total Customers:		54406		
Total Medical Baseline (MBL):		3086		
Total Life Support (LS):		2030		
Total Critical Facilities:		1675		

EXERCISE USE ONLY

# Module One Discussion Questions (-24 HRS)

## Operational Considerations

1. Typically, the circuit list gets narrower from 48 to 24 hours. In this instance, the projected scope remains the same, how does that impact the response operation?

## Notifications/Communications

1. Given that the circuit list did not change from 48 hours are there any changes to what notifications are done at the 24-hour mark?
2. With the large potential scope of this event, are there concerns with our website's ability to handle increased traffic? What if any redundancies exist?
3. Can you please describe the reporting and data gathering that is done, including regulatory notifications to CalOES?
4. CalOES, please describe your operational posture at this point and how the information shared by SDG&E is utilized for planning and reporting.



# Module One Discussion Questions (-24 HRS) – Cont'd

## Customer Programs/Services

1. How are partners from critical infrastructure notified and what coordination occurs at this stage of the event?
2. What planning occurs for CRCs and when do they open?

## Operational Impacts

1. Public Safety Partners, what potential operational impacts would your organization have to plan for at this stage of PSPS operations?
  - a. Do you have the appropriate equipment, plans, processes, and procedures in place to mitigate any potential impacts to your operations?
  - b. How can SDG&E assist you with your current PSPS planning efforts?



**BREAK**



**MODULE TWO:**  
**STAGE 2 – DECISION TO DE-ENERGIZE**  
**STAGE 3 – DE-ENERGIZATION INITIATED**



# Module Two Scenario Updates

## SCENARIO UPDATE

This module will now cover PSPS Stage 2 and Stage 3. SDG&E circuits have met PSPS thresholds, and the decision has been made to initiate de-energization in the specified circuits as conditions develop. A wildfire has started in the City of San Diego and relevant public safety partners have begun emergency response efforts to control the fire. The SDG&E EOC is now at a Level II activation. SDG&E Meteorology has provided the weather forecast below

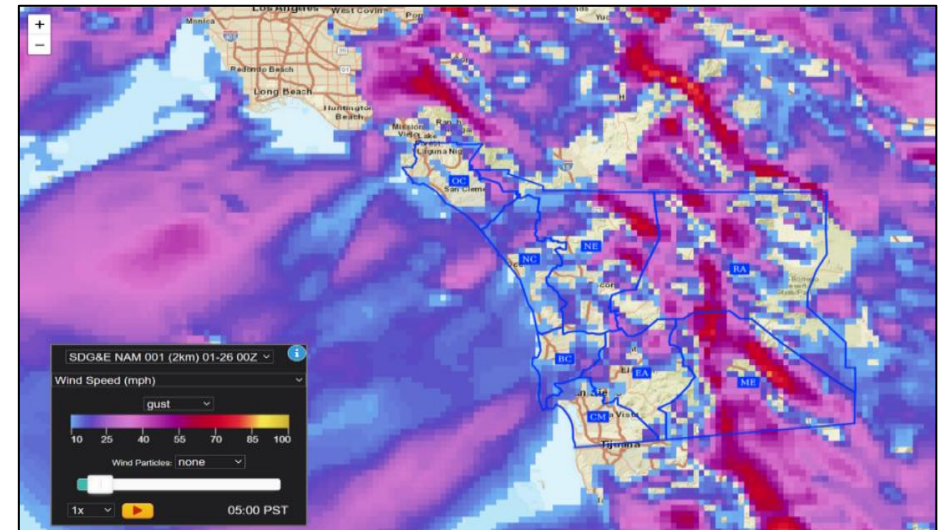
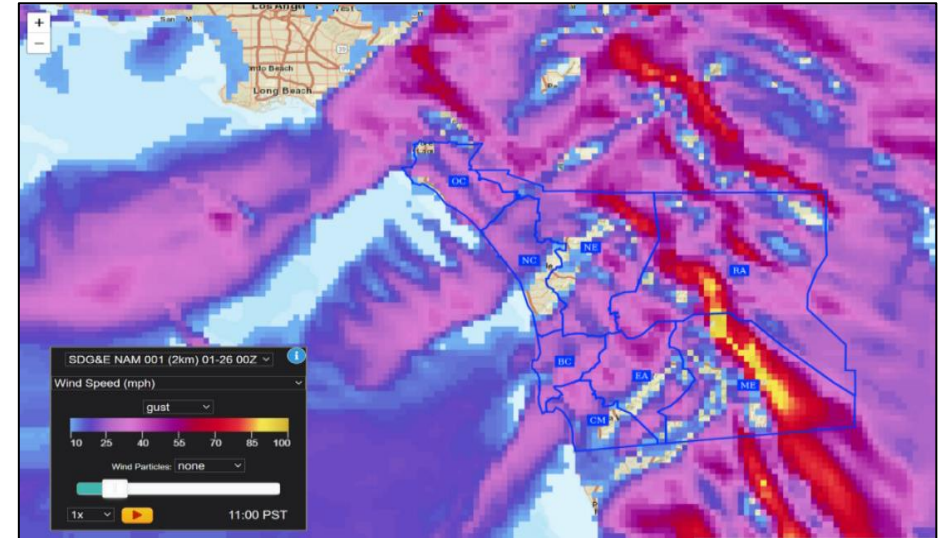
## WEATHER UPDATE

- Forecast models in advance of the event indicated that winds would surface in a mountain wave pattern. Such events are known for producing strong winds that occur outside of the “typical” Santa Ana wind footprint and are notoriously difficult to forecast.

## QUESTION

- Meteorology: Could you please give us a brief overview of the forecast, threats, and risk at this stage of the scenario?

**EXERCISE USE ONLY**




# Module Two Scenario Updates: Fire Potential Index

	<b>Tue 4/11</b>	<b>Wed 4/12</b>	<b>Thu 4/13</b>	<b>Fri 4/14</b>	<b>Sat 4/15</b>	<b>Sun 4/16</b>	<b>Mon 4/17</b>
<b>ME</b>	Extreme 16	Elevated 14	Elevated 14	Elevated 14	Elevated 13	Elevated 12	Normal 11
<b>RA</b>	Extreme 16	Elevated 14	Elevated 14	Elevated 14	Elevated 13	Elevated 12	Normal 11
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<b>BC</b>	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11	Normal 11	Normal 10
<b>CM</b>	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11	Normal 11	Normal 10

**EXERCISE USE ONLY**



# Module Two Scenario Updates: Red Flag Warning

SANTA ANA WILDFIRE THREAT INDEX	
	
Zones	Tue/Apr 11
Zone 1: LA-Ventura	
Zone 2: Orange-Inland Empire	
Zone 3: San Diego	
Zone 4: Santa Barbara	

NO RATING	Winds are either not expected, will not contribute to significant fire activity.
MARGINAL	Upon ignition, fires may grow rapidly.
MODERATE	Upon ignition, fires will grow rapidly and will be difficult to control.
HIGH	Upon ignition, fires will grow very rapidly, will burn intensely, and will be very difficult to control.
EXTREME	Upon ignition, fires will have extreme growth, will burn very intensely, and will be uncontrollable.

EXERCISE USE ONLY

# De-Energization



**EXERCISE USE ONLY**

# Module Two Scenario: Fire Update 1

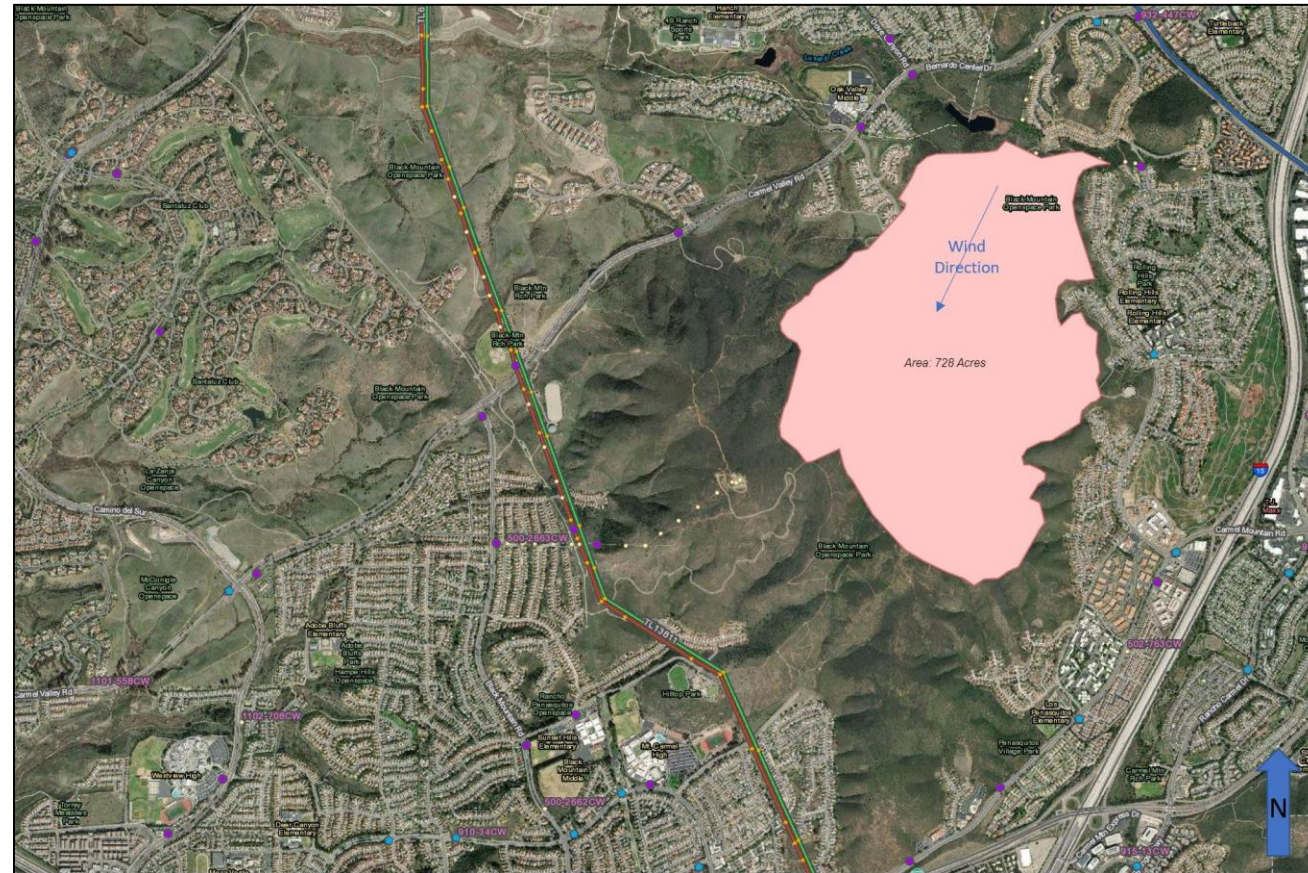
- At 5am, 911 dispatcher received a call for a reported vegetation fire in the northeast area of Black Mountain within the City of San Diego.
- On arrival at scene, the first in fire unit reports that the fire is 25 acres with an immediate structure threat and to initiate evacuations.
- Hikers frequent this area and SDG&E equipment is all underground at this location. The fire is moving in a southwestern direction due to the wind.

**EXERCISE USE ONLY**



# Module Two Scenario: Fire Update 2

- The fire on Black Mountain within the City of San Diego has grown to 728 acres and has caused minor damage to some residential homes and Tel/Com equipment.
- The fire continues to grow with the wind in a southwestern direction, but firefighters have been successful in directing the fire away from most neighborhoods, (although the fire is still threatening homes and nearby neighborhoods due to proximity).



**EXERCISE USE ONLY**

# Module Two Discussion Questions

## Operational Considerations

1. SDG&E, discuss your overarching responsibilities timeframe of PSPS operations.
  - a. In Stage 2, describe the process for determining the decision to de-energize. (OIC)
  - b. In Stage 3, describe the process for initiating de-energization. (DOC-E)
2. City of San Diego, given the fire within your jurisdiction please describe what actions would be taken, specifically regarding evacuation, sheltering, and public information.
3. SDG&E, how does the introduction of a wildfire in the service territory impact PSPS operations?
  - a. What additional responsibilities should be taken into consideration that may modify current EOC operations?
    - i. Fire coordinators, please describe your role and ability to support both a wildfire and a PSPS response simultaneously.
  - b. How are requests for information and resources from external agencies coordinated?
4. City of San Diego, what impacts does a wildfire response with the potential for PSPS bring to your operation? How does planning for potential loss of power outside of the evacuation area impact planning?



# Module Two Discussion Questions – Cont'd

## Customer Programs/Services

1. What programs/services are available to customers?
  - a. How are you informing the public of the provided programs/services?
  - b. Would any currently activated customer programs/services be affected by the wildfire?
  - c. If evacuees go to a CRC, what communication and coordination would occur to ensure they get additional services (such as sheltering) that they may need as a result of the fire?

## Notifications/Communications

1. SDG&E, what customer and/or governmental agency notifications are being made in this stage once de-energizations begin?
2. How are sheltering and evacuation notifications being made to impacted personnel and the general public?
3. For City of San Diego, public information needs to occur regarding PSPS potential impacts and resources at the same time as real-time information about the wildfire. What strategies are used to provide both messages simultaneously to the impacted communities?



**MODULE THREE:**  
**STAGE 4: INITIATING RE-ENERGIZATION PROTOCOLS**  
**STAGE 5: ALL PSPS LINES RE-ENERGIZED**

# Module Three Scenario Updates

## SCENARIO UPDATE

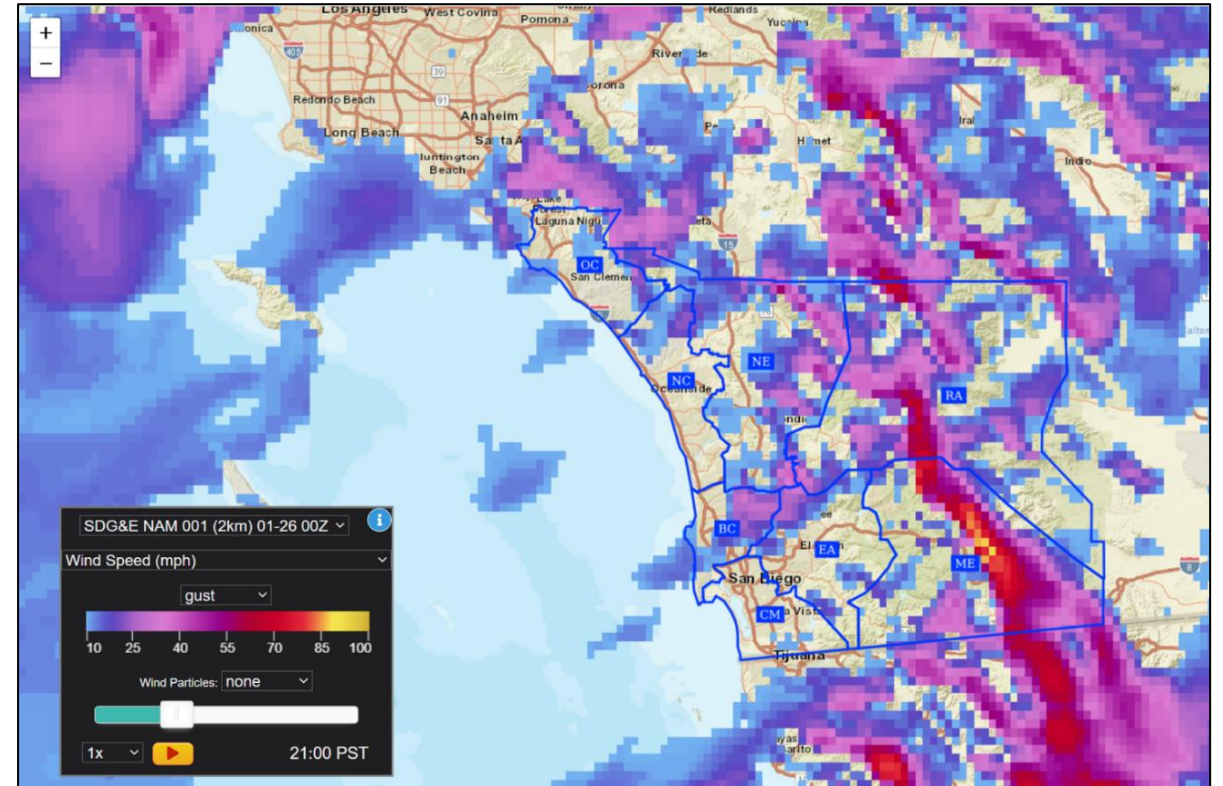
This module will now cover PSPS Stage 4 and Stage 5. At this time, PSPS conditions have passed, and SDG&E has begun the patrol process for the circuits that were de-energized. Emergency response operations related to the City of San Diego wildfire have also concluded. The SDG&E EOC is still activated at this time, but demobilization discussions have begun. SDG&E Meteorology has provided the following updates:

## WEATHER UPDATE

- Forecast models in advance of the event indicated that winds would surface in a mountain wave pattern. Such events are known for producing strong winds that occur outside of the “typical” Santa Ana wind footprint and are notoriously difficult to forecast.

## QUESTION

- Meteorology: Could you please give us a brief overview of the forecast, threats, and risk at this stage of the scenario?



**EXERCISE USE ONLY**

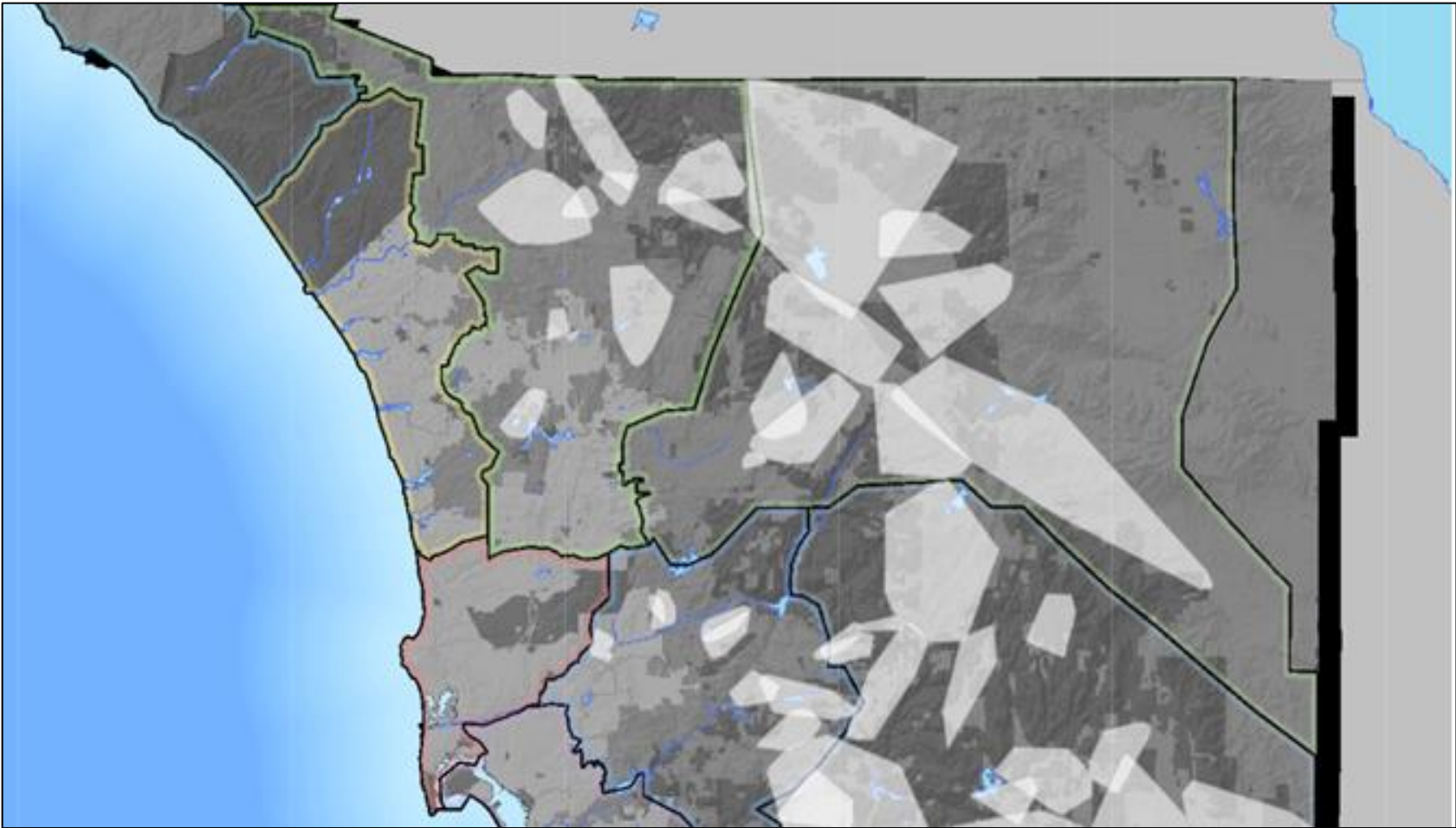
# Fire Potential Index

	<b>Tue 4/11</b>	<b>Wed 4/12</b>	<b>Thu 4/13</b>	<b>Fri 4/14</b>	<b>Sat 4/15</b>	<b>Sun 4/16</b>	<b>Mon 4/17</b>
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<b>EA</b>	Extreme 16	Elevated 14	Elevated 13	Elevated 13	Elevated 13	Elevated 12	Normal 11
<b>NE</b>	Extreme 16	Elevated 14	Elevated 13	Elevated 13	Elevated 13	Elevated 12	Normal 11
<b>OC</b>	Extreme 15	Elevated 14	Elevated 13	Elevated 12	Normal 11	Normal 11	Normal 11
<b>NC</b>	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11	Normal 11	Normal 10
<b>BC</b>	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11	Normal 11	Normal 10
<b>CM</b>	Extreme 15	Elevated 13	Elevated 12	Normal 11	Normal 11	Normal 11	Normal 10

**EXERCISE USE ONLY**



# De-Energization



Total Customers:	29516
Total Medical Baseline (MBL):	2440
Total Life Support (LS):	1647
Total Critical Facilities:	1204

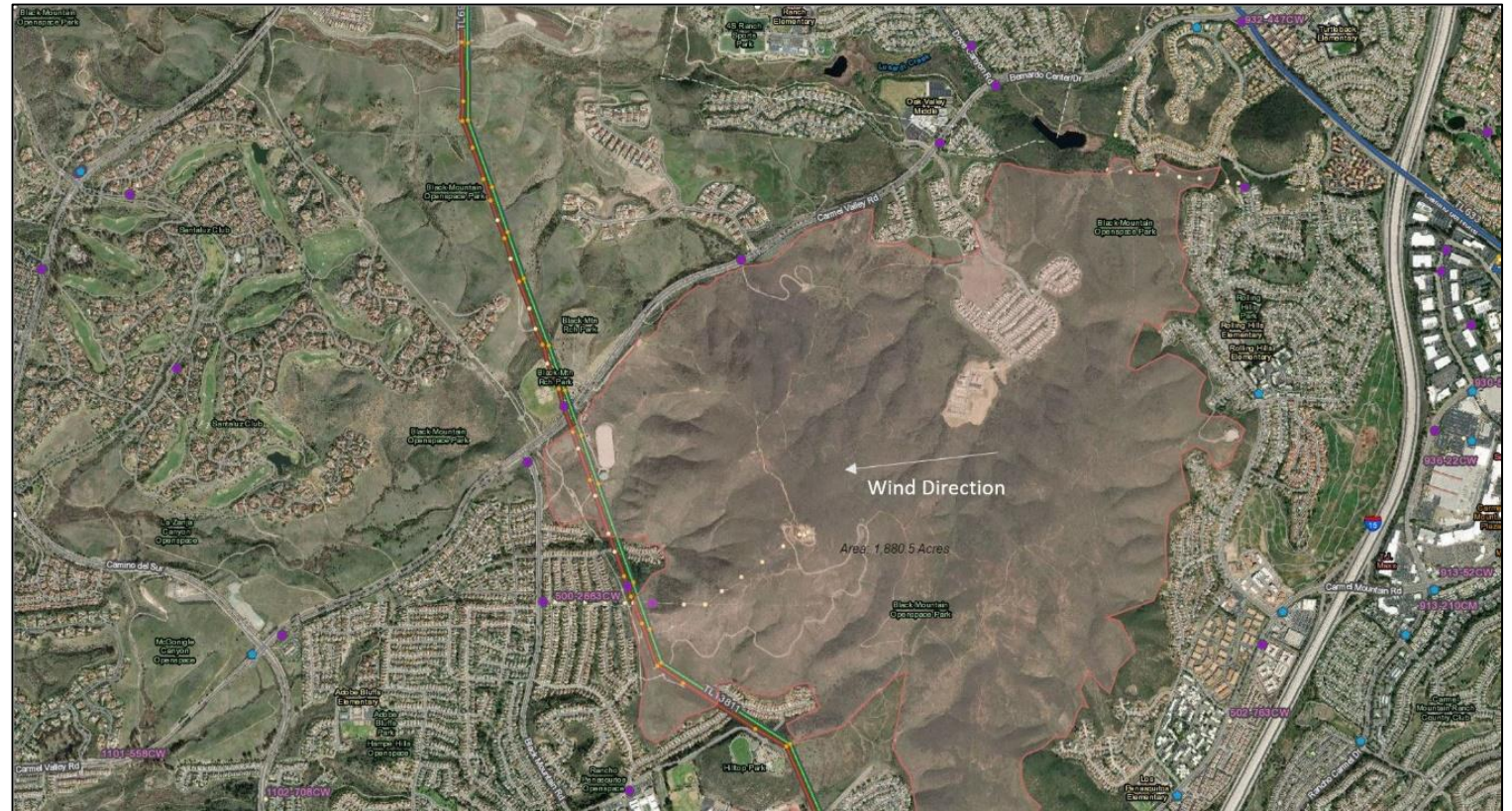
Batch 4

EXERCISE USE ONLY



# Fire Update 3

- The fire burned over and through Black Mountain within the City of San Diego but is now considered contained and fire crews will be on scene to mop up the remaining hot spots.
- The fire concluded with a total of 1880.5 acres burned, no loss of life, minor damage to some residential homes, destroyed some Tel/Com equipment, and caused review of specific tie lines and nearby circuits.
- Repopulation of the evacuation areas has been completed.
- The city has allowed for SDG&E crews to re-enter the area to survey damage and begin re-energization discussions.



**EXERCISE USE ONLY**

# Module Three Discussion Questions

## Operational Considerations

1. SDG&E, discuss your overarching responsibilities during this timeframe of PSPS operations.
  - a. What conditions must be met, and actions taken prior to re-energization?
2. If the wildfire impacted area was de-energized, how would that impact re-energization in that area?

## Notifications/Communications

1. What notifications are being made during this timeframe regarding the initiation of re-energization and the re-energization of lines?



**END OF EXERCISE**





HOTWASH



**CLOSING REMARKS**