FBC COMPLAINT REGARDING FBC'S PUBLIC SAFETY POWER SHUTOFF POLICY EXHIBIT C1-2



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May 20, 2025

British Columbia Utilities Commission Suite 410, 900 Howe Street Vancouver, BC V6Z 2N3

Dear Commission Secretary:

Re: Complaint Regarding FortisBC Inc. (FBC) Public Safety Power Shutoff (PSPS)

Policy

FBC PSPS Policy and Protocol

FBC writes pursuant to the British Columbia Utilities Commission Order G-115-25 dated May 12, 2025 regarding the above noted matter which directed FBC to file its PSPS policy with the BCUC.

In accordance with Directive 3 of Order G-115-25, FBC attaches its PSPS policy as well as its PSPS operating protocol which sets out the operational practices and procedures it will follow for a PSPS event when implemented. Consistent with Section 8.1 of the policy, FBC will review its policy regularly to assess its effectiveness and alignment with industry practices and regulatory requirements, as well as feedback from customers and public safety partners. As such, FBC expects that its PSPS policy and protocol will continue to evolve over time.

If further information is required, please contact	

Sincerely,

FORTISBC INC.

Original signed:

Sarah Walsh

Attachments

cc (email only): The Town of Princeton (scoyne@princeton.ca; ckassa@princeton.ca; ckassa@princeton.ca; ckassa@princeton.ca; ckassa@princeton.ca; ckassa@princeton.ca; ckassa@princeton.ca)





Public Safety Power Shutoff

DOCUMENT NUMBER:

DOCUMENT TYPE: Policy

Owner:

SML:

Utility: Electric

Approved Date:

Effective Date:

Next Review Date:

CATEGORY: Field – Operations (Electric)

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1.0 Policy Objective

- 1.1 FortisBC Inc. ("FortisBC") recognizes the escalating effects of extreme weather within British Columbia, including within its electricity service area, and is committed to reducing the risk of wildfires through the implementation of comprehensive wildfire mitigation strategies. These strategies aim to reduce the risk of FortisBC's activities or equipment igniting a wildfire, as well as the risk of wildfires impacting FortisBC's infrastructure.
- 1.2 The objective of this policy is to outline FortisBC's approach to public safety power shutoffs, including the role of public safety power shutoffs in FortisBC's overall approach to wildfire mitigation.

2.0 Wildfire Mitigation Approach

2.1 FortisBC has a comprehensive approach to wildfire mitigation as detailed in its Wildfire Mitigation Plan. Wildfire mitigation measures include:



- a. System, equipment, and structure design and construction, and technical upgrades, which aim to improve system hardening to prevent contact between FortisBC's infrastructure and fuel sources:
- b. Inspection and maintenance activities, which aim to ensure all infrastructure is in working condition and vegetation risks; and
- c. Operational practices, which are proactive, day-to-day actions taken to mitigate wildfire risks.
- 2.2 Within its operational practices, FortisBC has implemented two wildfire mitigation system settings:
 - a. Level 1- Forest Fire Hazard Reclose Off Policy. The first level of wildfire mitigation involves turning off reclosing on certain distribution and transmission lines once a campfire ban has been activated in the fire center where the line is located. This setting prevents automatic re-energization of a line after a fault has been experienced.
 - b. Level 2- Substation Fast Tripping. The second level of mitigation involves enabling station feeder fast tripping on certain distribution lines when a campfire ban has been activated in the fire center where the line is located, and the BC Wildfire Service Danger Class Forecast is Level 5 (Extreme Danger). This setting increases the sensitivity of FortisBC's equipment, so that the system detects and deenergizes faults faster than the standard setting.
- 2.3 A public safety power shutoff (PSPS) is an additional level of wildfire mitigation. Development of a PSPS policy is becoming increasingly common among electric utilities in North America. A PSPS event is the proactive de-energization of powerline(s) during periods of extreme wildfire risk to reduce potential ignition sources. FortisBC understands that customers rely on electricity and PSPS events are a tool of last resort.

3.0 PSPS Objective

3.1 FortisBC's top priority is the safety of the public and its employees. The objective when initiating a PSPS event is to keep customers and communities safe. A PSPS event is a tool of last resort during periods of extreme wildfire risk.

4.0 PSPS Application

4.1 A PSPS event will only be implemented on those lines identified in the Public Safety Power Shutoff Protocol ("Protocol").

5.0 PSPS Process

5.1 FortisBC's PSPS initiation process, as detailed in its Protocol, will be initiated where the threshold criteria set out in the Protocol are met. The Protocol details the steps to be followed to initiate a PSPS event, including the decision-making process.



- 5.2 The steps or phases of a PSPS event are set out below, with the detailed actions to be taken during each step set out in the Protocol. At each step, conditions will be assessed, and a decision will be made whether to proceed with subsequent steps or stand down the PSPS event. Where a PSPS event is stood down after notifications have been initiated, updates will be provided to internal and external affected parties indicating that a PSPS event is standing down and the Emergency Operations Centre (EOC) and Area Command Centre (ACC) will begin a stand down process. These steps and timelines set out below may change, or be abbreviated or extended, in response to changing weather conditions:
 - a. **PSPS Monitor**. Where FortisBC becomes aware of forecasted weather conditions that meet its threshold criteria more than 72 hours prior to such forecasted conditions, a PSPS Monitor phase will be initiated. This is an internal phase only, to facilitate internal coordination and initial mobilization.
 - b. PSPS Watch. A PSPS Watch phase occurs 72 hours (where possible) prior to forecasted weather conditions that meet the threshold criteria. During the PSPS Watch phase, the EOC and ACC will be activated, and notifications will be initiated to internal and external affected parties indicating the potential for a PSPS event.
 - i. PSPS Watch Update. A PSPS Watch Update occurs 48 hours (where possible) prior to forecasted weather conditions that meet the threshold criteria. During the PSPS Watch Update, updates will be provided to internal and external affected parties indicating the continued potential for a PSPS event.
 - c. **PSPS Warning**. A PSPS Warning phase occurs 24 hours (where possible) prior to forecasted weather conditions that meet the threshold criteria. During the PSPS Warning phase, the EOC and ACC will be elevated to level 2, and updates will be provided to internal and external affected parties indicating that a PSPS event is likely.
 - d. **PSPS Imminent**. A PSPS Imminent phase occurs 4 hours (where possible) prior to forecasted weather conditions that meet the threshold criteria. At this step, a final decision will be made whether the PSPS event is to proceed. During the PSPS Imminent phase, the EOC and ACC will be elevated to level 3, and updates will be provided to internal and external affected parties indicating that a PSPS event is imminent.
 - e. **PSPS Initiated**. Power will be shutoff in identified areas 2 hours (where possible) prior to forecasted weather conditions that meet the threshold criteria.
 - f. **PSPS Restoration.** Updates will be provided to internal and external affected parties during a PSPS event. Once the weather conditions have passed, the PSPS Restoration steps will begin.

6.0 PSPS Notification

6.1 FortisBC recognizes that clear, timely communication is critical to PSPS event implementation. While weather conditions can change quickly, FortisBC will



- provide as much advance notice as possible of a PSPS event, and will provide updates throughout the outage, as detailed in the Protocol.
- 6.2 Where possible, FortisBC will notify and update internal and external affected parties at the phases indicated above, as detailed in the Protocol. Affected external parties include emergency management partners, local and provincial governments, Indigenous communities, British Columbia Utilities Commission (BCUC), and impacted customers.
- 6.3 Additional steps will be taken to notify vulnerable customers customers who depend on power for medical needs are encouraged to reach out to FortisBC's customer service team to register as a vulnerable customer. Vulnerable customers can also add a second person to be contacted, in addition to themselves, in the event they may be impacted by a PSPS event.

7.0 PSPS Responsibilities

- 7.1 The roles and responsibilities in the initiation and implementation of a PSPS event are outlined below:
 - a. **Control Centre** Responsible for monitoring weather conditions (together with Network Services), creating and updating event report form, and initiating PSPS event when directed by ACC as detailed in the Protocol.
 - b. **Emergency Management** Responsible for coordinating with emergency management partners and providing support during the initiation and implementation of a PSPS event.
 - c. EOC/ACC Responsible to support the operational response as detailed in the Protocol and the Corporate Emergency Response Plan, with the EOC responsible for managing the corporate response.
 - d. **Executive Leadership Team** Responsible for PSPS event decisions as identified in the Protocol.
 - e. **Network Services** Responsible for monitoring weather conditions (together with Control Center) and providing operational support during the initiation and implementation of a PSPS event as detailed in the Protocol.
 - f. **Public Affairs Emergency Team (PAET)** Responsible for communicating to impacted local and provincial governments, Indigenous communities, and customers, including vulnerable customers, as detailed in the Protocol and the Corporate Emergency Response Plan.
 - g. **Regulatory** Responsible for communicating to BCUC as detailed in the Protocol.

8.0 Review and Evaluation

8.1 This policy will be reviewed as required to assess its effectiveness and alignment with industry practices and regulatory requirements. Feedback from stakeholders, including customers and public safety partners, will be considered in the review process.

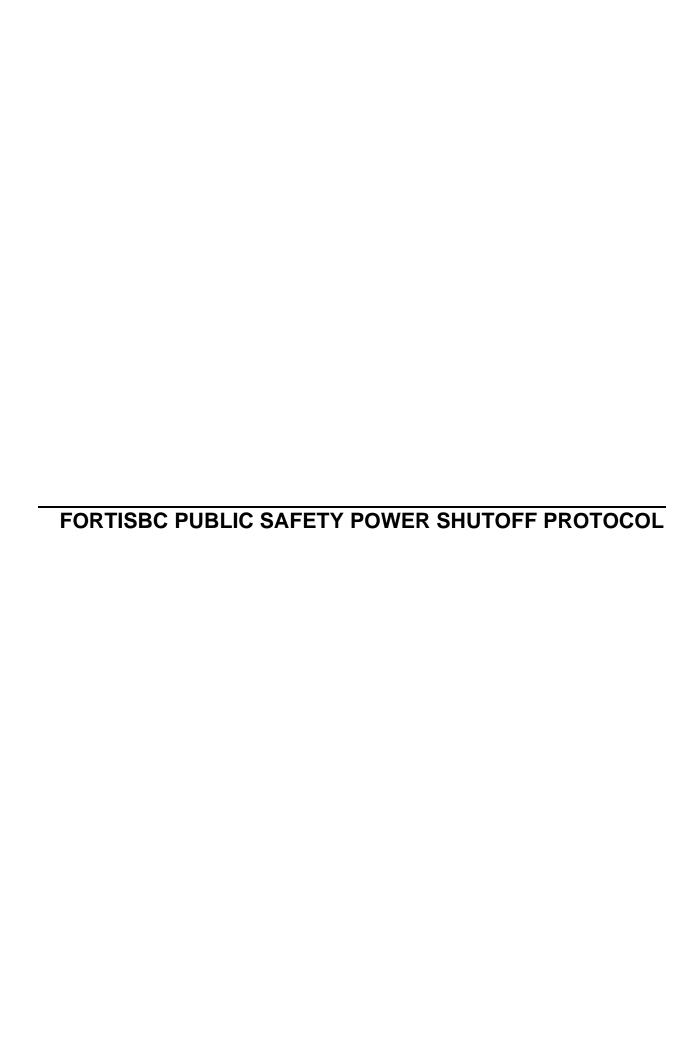


9.0 Audits

9.1 Audits may be conducted from time to time to monitor the operation of this policy and its related procedures.

10.0 Questions

10.1 Any questions relating to this policy should be directed to the Executive Vice President, Operations & Engineering.





Public Safety Power Shutoff (PSPS) Protocol

Approved By:

Date:

Revision History

Date	Rev	Description	Author	Checked
May 16, 2025	1	Protocol Document	K. Gelsinger	R. Maschek

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1.0 General

The purpose of this protocol document is to detail the steps (the "**PSPS Initiation Steps**") to be followed to initiate a Public Safety Power Shutoff (PSPS) event during periods of extreme wildfire risk. The emphasis is on the various parties involved in communicating and initiating a PSPS event and the follow-up expected when a PSPS event is initiated, versus System Operator (SO) and Distribution Operator (DO) actions that are required (SOs and DOs are collectively referred to as Operators.)

2.0 Responsibility

FortisBC Network Services management, with input from the PSPS Steering Committee, are responsible for maintaining this document. This protocol should be reviewed and updated as required.

3.0 PSPS

A PSPS event is the proactive de-energization of powerline(s) during periods of extreme wildfire risk, PSPS events are a tool of last resort for FortisBC.

3.1 PSPS Thresholds

Network Services management and the Control Centre will monitor current and forecast weather conditions. The PSPS Initiation Steps, as outlined in section 3.4, will be initiated where the following weather conditions exist for a line/feeder identified in Appendix "A" to this protocol document:

- Sustained wind in excess of 75 km/h including real time and forecast data; and
- Fire Weather Index (FWI) greater than 47 including real time and forecast data

3.2 Additional Factors for Consideration

Once the PSPS thresholds set out in Section 3.1 have been met, additional factors will, as applicable, be considered to guide PSPS decision-making with respect to a particular location or line/feeder throughout the PSPS Initiation Steps, such as (a) alternative mitigation strategies that have been taken, or can be taken prior to forecast weather conditions, to reduce the risk of wildfire ignition, (b) any relevant Environment Canada weather alerts, and (c) input from public safety partners, local and provincial governments, Indigenous communities, and critical infrastructure providers, where available.

3.3 PSPS Decision-Making

For the purposes of this protocol document:

- "ELT Decision" means a decision to be made by the Executive Vice President,
 Operations & Engineering, with input from other members of the Executive Leadership
 Team as appropriate, such as the Vice President, Customer Service & External
 Communications, Vice President, Indigenous Relations & Regulatory Affairs, Vice
 President, Corporate Services & Technology, and Vice President, General Counsel,
 Corporate Secretary & Sustainability.
- "EOC/ACC Decision" means a decision to be made at the Emergency Operations Centre (EOC)/Area Command Centre (ACC) level.

The decision to proceed to subsequent PSPS Initiation Steps, as outlined in section 3.4, is an EOC/ACC Decision. The decision to stand down a PSPS event once the PSPS Initiation Steps have been initiated, but before power has been shut off, is an EOC/ACC Decision, except that where a stand down decision is based on consideration of additional factors as set out in section 3.2, the decision is an ELT Decision.

The decision to shutoff power, initiating a PSPS event, is an ELT Decision.



The decision to end a PSPS event is an ELT Decision.

Decision-making throughout the PSPS Initiation Steps will include consideration of current and forecast weather conditions, and additional factors as set out in Section 3.2.

3.4 PSPS Initiation Steps

Once PSPS thresholds as outlined in section 3.1 have been met, the PSPS Initiation Steps begin.

Best efforts will be made to follow the timelines set out in these PSPS Initiation Steps where possible, with the understanding that weather forecasts are unpredictable, and timelines can change. For example, where the weather forecast changes with short notice, the phases set out below may be abbreviated or extended, or FortisBC may bypass earlier phases, proceeding directly to a later phase.

PSPS Monitor – greater than 72 hours (where possible) prior to forecast weather conditions

- Network Services management and the Control Centre will monitor Spatial Intelligence Portal (SIP) to determine whether forecast weather conditions meet the PSPS threshold weather conditions set out in section 3.1
- Where Network Service management and the Control Centre become aware, more than 72 hours prior to forecast conditions, that forecast weather conditions will meet the PSPS threshold weather conditions set out in section 3.1, they will initiate a coordination call between Control Centre management, Network Services management, Public Affairs Emergency Team (PAET), and other internal stakeholders as required

PSPS Watch – 72 hours (where possible) prior to forecast weather conditions

- Control Centre receives SIP PSPS watch message/alarm
- Control Centre Operator creates 2P-19 Event report form
 - Report to include areas where power will potentially be shut off
- Control Centre Operator to notify Control Centre management
- ACC and EOC activated at Level 1
 - o PAET activated
- Except as set out below, ACC/EOC Decision whether to proceed with PSPS Initiation Steps or stand down
 - Review current and forecast weather conditions and consider additional factors as set out in section 3.2
 - Where a stand down decision is based on consideration of additional factors as set out in section 3.2, this decision is an ELT Decision
- If standing down, ACC to communicate stand down decision to Control Centre management, Network Services management, and other impacted internal stakeholders as required
- If proceeding with PSPS Initiation Steps:
 - ACC operations team creates a list of impacted¹ customers (including critical infrastructure and vulnerable customers) and forwards to PAET Director
 - Internal and external notifications initiated indicating the potential for a PSPS event and anticipated timeline, including areas that may be impacted:
 - Emergency Management Climate Readiness BC notified by FortisBC Emergency Management
 - Impacted local and provincial governments and Indigenous communities notified by PAET
 - British Columbia Utilities Commission (BCUC) notified by FortisBC Regulatory Department

¹ Impacted customers, Indigenous communities, local governments, and stakeholders are those located in the area of a potential PSPS event.



- PAET to notify impacted customers, taking additional steps to notify vulnerable customers
- Website (service alert), outage map, and media update

PSPS Watch Update – 48 hours (where possible) prior to forecast weather conditions

- EOC/ACC remains Level 1
- Except as set out below, ACC/EOC Decision whether to proceed with PSPS Initiation Steps or stand down
 - Review current and forecast weather conditions and consider additional factors as set out in section 3.2
 - Where a stand down decision is based on consideration of additional factors as set out in section 3.2, this decision is an ELT Decision
- If standing down, notify internal and external parties that PSPS event will not be initiated:
 - Emergency Management Climate Readiness BC notified by FortisBC Emergency Management
 - Impacted local and provincial governments and Indigenous communities notified by PAET
 - o BCUC notified by FortisBC Regulatory Department
 - PAET to notify impacted customers
 - Website (service alert), outage map, and media update
- If proceeding with PSPS Initiation Steps, complete second internal and external notification indicating continued potential for PSPS event, and updating on any changes to anticipated timeline and areas for potential PSPS event:
 - Emergency Management Climate Readiness BC updated by FortisBC Emergency Management
 - Impacted local and provincial governments and Indigenous communities updated by PAET
 - o BCUC updated by FortisBC Regulatory Department
 - PAET to update impacted customers
 - Website (service alert), outage map, and media update

PSPS Warning – 24 hours (where possible) prior to forecast weather conditions

- EOC/ACC Level 2
 - Consider need to reallocate field personnel for PSPS support
- Except as set out below, ACC/EOC Decision whether to proceed with PSPS Initiation Steps or stand down
 - Review current and forecast weather conditions and consider additional factors as set out in section 3.2
 - Where a stand down decision is based on consideration of additional factors as set out in section 3.2, this decision is an ELT Decision
- If standing down, notify internal and external parties that PSPS event will not be initiated:
 - Emergency Management Climate Readiness BC notified by FortisBC Emergency Management
 - Impacted local and provincial governments and Indigenous communities notified by PAET
 - BCUC notified by FortisBC Regulatory Department
 - PAET to notify impacted customers
 - Website (service alert), outage map, and media update
- If proceeding with PSPS Initiation Steps, complete third internal and external notification that a PSPS event is likely:
 - Emergency Management Climate Readiness BC updated by FortisBC Emergency Management
 - Impacted local and provincial governments and Indigenous communities updated by PAET
 - BCUC updated by FortisBC Regulatory Department
 - PAET to update impacted customers
 - o Website (service alert), outage map, and media update



PSPS Imminent – 4 hours (where possible) prior to forecast weather conditions

- EOC /ACC Level 3
- FortisBC field personnel to monitor local weather conditions to verify forecast, as instructed by ACC
- EOC/ACC to confirm which feeder/line(s) will be de-energized

ELT Decision, based on EOC/ACC recommendation, whether to proceed with PSPS event

- Review current and forecast weather conditions and consider additional factors as set out in section 3.2
 - If standing down, notify internal and external parties that PSPS event will not be initiated:
 - Emergency Management Climate Readiness BC notified by FortisBC Emergency Management
 - Impacted local and provincial governments and Indigenous communities notified by PAET
 - o BCUC notified by FortisBC Regulatory Department
 - PAET to notify impacted customers
 - o Website (service alert), outage map, and media update
 - If proceeding with PSPS Initiation Steps:
 - Approval to proceed shall be communicated to Control Centre by ACC
 - Fourth internal and external notification that PSPS event is imminent:
 - Emergency Management Climate Readiness BC updated by FortisBC Emergency Management
 - Impacted local and provincial governments and Indigenous communities updated by PAET
 - BCUC updated by FortisBC Regulatory Department
 - PAET to update impacted customers
 - Website (service alert), outage map, and media update

PSPS Initiated – 2 hours (where possible) prior to forecast weather conditions

- PSPS event initiated by Control Centre Operator
 - Power shutoff in identified areas
 - Follow individual feeder de-energization procedure including sectionalizing feeders at specific switch points where directed by ACC
- 2P-19 Event Notification sent by Control Centre Operator, which includes:
 - o Areas where power has been shut off
 - Anticipated duration of outage (ETOR)
- EOC/ACC and Control Centre monitor weather conditions
- Website (service alert), outage map, and media update

PSPS Updates – approximately every 12 hours (TBD)

Updates to be communicated internally and externally

PSPS Restoration – once EOC/ACC determines that weather conditions have passed, based on:

- Current and forecast winds below the PSPS threshold as identified in section 3.1; or
- Current FWI below the PSPS threshold as identified in section 3.1

Restoration steps:

- EOC/ACC to confirm current and forecast winds are below the PSPS threshold as identified in section 3.1 or current FWI is below the PSPS threshold as identified in section 3.1
- EOC/ACC to confirm a complete patrol of affected feeder(s) has been completed



ELT Decision, based on EOC/ACC recommendation, to end PSPS event and restore service

Approval to restore communicated to Network Services and Control Centre by EOC/ACC

Operator actions, upon receipt of decision to restore service:

- · Confirm feeder reclosing off
- Confirm feeder fast trip settings on where applicable
- Restoration of customer loads to follow individual feeder restoration procedure including staged restoration to maximize the number of customers restored in the shortest time possible.
- Close appropriate feeder circuit breaker/recloser(s) to restore load
- 2P-19 Event report update including:
 - Areas restored
 - Any outstanding issues on the system

Once feeders have been restored, final update to internal and external parties that service has been restored:

- Emergency Management Climate Readiness BC updated by FortisBC Emergency Management
- Impacted local and provincial governments and Indigenous communities updated by PAET
- BCUC updated by FortisBC Regulatory Department
- PAET to update impacted customers
- Website (service alert), outage map, and media update



Appendix "A"

Feeder	Service Area	Length of Line (km)	Customer Count
HED3	76 - Keremeos	23.05	277
HED4	76 - Keremeos	22.04	574
KET1	64 - Greenwood	203.73	1049
KET2	64 - Greenwood	123.62	508
KET5	64 - Greenwood	12.63	0 – Express to MDY 1
KET6	64 - Greenwood	47.76	933
			(Includes GRS1 & GRS2)
MDY1	64 - Greenwood	1.65	1 Industrial
MDY2	64 - Greenwood	30.40	461
PRI2	91 - Princeton	99.03	711
PRI4	91 - Princeton	244.99	1685