

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

Order Instituting Rulemaking to Examine Electric  
Utility De-Energization of Power Lines in Dangerous  
Conditions.

Rulemaking 18-12-005  
(Filed December 13, 2018)

**2022 ANNUAL ACCESS AND FUNCTIONAL NEEDS PLAN  
OF PACIFICORP (U 901 E)**

Dated: January 31, 2022

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**2022 ANNUAL ACCESS AND FUNCTIONAL NEEDS PLAN  
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PacifiCorp d/b/a Pacific Power (PacifiCorp or company) submits its plan to address access and functional needs (AFN) customers and communities during a de-energization event, attached as Attachment A. This plan is submitted consistent with Decision (D.) 21-06-034 issued June 24, 2021, Decision Adopting Phase 3 Revised and Additional Guidelines and Rules for Public Safety Power Shutoffs (Proactive De-Energizations) of Electric Facilities to Mitigate Wildfire Risk caused by utility infrastructure, specifically Appendix A to the Phase 3 Decision (Appendix A), Section K, Reporting.

Dated: January 31, 2022

Respectfully submitted,

/s/

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# **Attachment A**

**PacifiCorp**

**Plan to Support Populations with Access and Functional Needs  
During Public Safety Power Shutoffs**

**January 31, 2022**



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## SUMMARY

PacifiCorp's Wildfire Mitigation Plan (WMP) is a comprehensive plan to mitigate the risk of wildfires on our communities. In addition to system hardening, vegetation management, and weather station monitoring, the WMP includes Public Safety Power Shutoffs (PSPS) as a measure of last resort as necessary to protect our customers and communities when wildfire risk is high. PacifiCorp was fortunate to participate in the Investor-owned Utility (IOU)'s development of their 2022 Plans to support individuals with Access and Functional Needs (AFN) during PSPS events. Beginning in 2021, PacifiCorp representatives attended the AFN Statewide Council and AFN Collaborative Planning team to glean insight from the IOU's AFN and statewide AFN stakeholders from a broad-spectrum of expertise. Due to the comparably small size of PacifiCorp's service territory, limited resources, and the number of AFN customers, PacifiCorp incorporated universal portions of the Joint IOU's plan and modified other portions to match the size and scope of our service territory. The Introduction and Section 1 of this report represent the work of PacifiCorp with the AFN Core Planning Team with slight modifications.

Replacing prior years' plans, the 2022 Plan will leverage Federal Emergency Management Administration's (FEMA) Comprehensive Preparedness Guide 6 Step Process as developed through the statewide process and required in Decision (D.) 21-06-034, which adopted Phase 3 revised and additional guidelines for PSPS to mitigate risk caused by utility infrastructure. Quarterly reports will continue to be filed to monitor progress and provide routine updates.

The main risk identified through collaboration with AFN stakeholders that this plan is intended to mitigate is: *"Individuals with AFN are unable to use power for devices/equipment for health, safety, and independence due to an unexpected PSPS or are unprepared for a PSPS."* PacifiCorp followed the same outline as identified with the statewide AFN Collaborative Planning Team to address "Who," "What," and "How" to support individuals with AFN and mitigate risks associated with PSPS events. While initial efforts are reflected in this Plan, work is ongoing and will continue to evolve.

PacifiCorp supports the AFN Statewide Council and AFN Collaborative Planning Team's development of the following definition of electricity dependent individuals who are the main target population to be supported by this Plan:

***Electricity Dependent Definition:*** *Individuals who are at an increased risk of harm to their health and safety during a Public Safety Power Shutoff. Including, but not limited to:*

- *Medical & Non-Medical*
- *Behavioral, Mental & Emotional Health*
- *Mobility & Movement*
- *Communication*
- *Individuals who require devices for health, safety and independence*

## INTRODUCTION

As climate conditions change, our region is facing drier and hotter weather conditions, making wildfires a year-round threat. PacifiCorp along with the other IOUs continually monitor weather and other climate conditions to detect fire conditions. When wildfire risk conditions present a safety threat to our customers and communities, electric utilities may call for a PSPS as a measure of last resort. Public Safety Power Shutoff (PSPS) de-energization activations disrupt the everyday lives of all individuals impacted. This 2022 Plan focuses primarily on individuals and communities with Access and Functional Needs, as they may be disproportionately impacted by PSPS activations. The plan was developed collaboratively with the AFN Core Planning Team comprised of leaders in the AFN community and the utilities.

Leveraging the Federal Emergency Management Administration's (FEMA) Comprehensive Preparedness Guide 6 Step Process, Decision (D.) 21-06-034 Phase 3 OIR Decision Guidelines, PacifiCorp collaborated with the AFN Core Planning Team and engaged the "whole community approach" to develop an overarching Joint IOU Statewide template to meet the diverse needs of the individuals with AFN. PacifiCorp participated in the AFN Core Planning Team with the intention to apply applicable sections of a statewide template to the company's 2022 Plan, develop greater understanding of the statewide Council's most critical areas of concern, identify best practices, and participate in the team's efforts to identify the maximum number of AFN customers in our communities.

This plan is focused on PacifiCorp's approach for serving individuals with AFN leading up to and during PSPS events. Specifically, it provides a summary of the research, feedback, and external input that has shaped its support strategy for populations with AFN, the programs that serve these individuals, the preparedness outreach approaches and the in-event customer communications which serve populations with AFN.

### Subject Matter Experts

PacifiCorp engaged regional and statewide AFN stakeholders with a broad-spectrum of expertise for the development of this plan in alignment with Step 1 of the FEMA Process:

*FEMA Step 1: Engaging the Whole Community in Planning.*

*Engaging in community-based planning—planning that is for the whole community and involves the whole community—is crucial to the success of any plan.*

#### *Joint IOUs and Statewide AFN Council*

Along with the IOUs, PacifiCorp began by soliciting engagement from the AFN Statewide Council and AFN Collaborative Planning Team (identified by the Commission) for the development of its plan. On September 24, 2021, the IOUs introduced this effort at the broader AFN Statewide meeting and invited participation, and subsequently held a kick-off meeting for core planning members on October 29, 2021. Approximately 20 organizations representing the diverse needs and perspectives of the AFN community volunteered to participate in the 2022 Core Planning Team, as shown in the below table.



## Statewide Collaborative Planning Team

Participating Utilities	Named Parties Included per Phase 3 OIR PSPS Decision:	Overarching Collaborative Planning Team Representatives with AFN Expertise
<ul style="list-style-type: none"> <li>● San Diego Gas &amp; Electric (SDG&amp;E)</li> <li>● Southern California Edison (SCE)</li> <li>● Pacific Gas &amp; Electric (PG&amp;E)</li> <li>● Liberty</li> <li>● PacifiCorp</li> <li>● Bear Valley</li> </ul>	<ul style="list-style-type: none"> <li>● State Council on Developmental Disabilities (SCDD)</li> <li>● California Health &amp; Human Services (CHHS)</li> <li>● California Foundation for Independent Living Centers (CFILC)</li> <li>● California Office of Emergency Services (CalOES)</li> <li>● Disability Rights California (DRC)</li> <li>● Disability Rights Education &amp; Defense Fund (DREDF)</li> </ul>	<ul style="list-style-type: none"> <li>● Alta California Regional Center (ACRC)</li> <li>● American Red Cross (ARC)</li> <li>● California Council of the Blind (CCB)</li> <li>● California Department of Developmental Services (CDDS)</li> <li>● California Department of Social Services (CDSS)</li> <li>● California Public Utility Commission (CPUC)</li> <li>● Central Valley Regional Center (CVRC)</li> <li>● Deaf Link, Inc.</li> <li>● Disability Policy Consultant</li> <li>● Interface 211</li> <li>● Kern Regional Center (KERNRC)</li> <li>● No Barriers Communications (NOBACOMM)</li> <li>● Redwood Coast Regional Center (RCRC)</li> </ul>

PacifiCorp participated in the January 6<sup>th</sup> collaborative working sessions with the parties named in the Phase 3 OIR PSPS Decision. The first in-depth all-day session on January 6, 2022, focused on identifying “Who.”

- “Who” the IOUs can identify as individuals with AFN in their systems, including who is at greatest risk during a PSPS
- “Who” the IOUs may not be able to identify but should still design support and resources for, to mitigate the impact of PSPS. Subsequent sessions are planned for Q1 2022 to address “What” and “How” the utilities plan to support individuals with AFN.

### *Wildfire Advisory Councils*

PacifiCorp established a Wildfire Advisory Board in an advisory function to provide direct feedback on Wildfire Mitigation Plans and PSPS Plans. The board consists of public safety partners, local government representatives, tribal officials, and a representative from the AFN community. The Council intends to meet quarterly in 2022.

### *Community Based Organizations*

PacifiCorp will continue to engage and solicit feedback from a variety of Community Based Organizations (CBOs) which also serve our customers. Additional information on the company's efforts with CBO partners is covered in later parts of this Plan.

### *SMJU Collaboration*

In 2022, PacifiCorp established a working group with representatives of Liberty, and Bear Valley Electric. The goal is to supplement the larger statewide groups and focus on best practices, AFN planning, and alignment for utilities with smaller service territories and shared challenges.

## **1. PURPOSE, SCOPE, SITUATION OVERVIEW, AND ASSUMPTIONS**

### **1.1 Purpose/Background**

Along with the IOUs, PacifiCorp understands that PSPS events disrupt the everyday lives of all individuals impacted. The following 2022 AFN PPS Plan focuses on mitigating the impacts of PPS for individuals and communities with AFN, as PPS may significantly impact these individuals more than the non-AFN population. This plan was developed collaboratively with the AFN Core Planning Team that is comprised of leaders in the AFN community and the utilities.

#### **2022 AFN Plan addresses the following:**

- Who we need to communicate with
- How we communicate with them
- What resources and services are needed during PPS activations

### **1.2 Scope**

Leveraging the FEMA Comprehensive Preparedness Guide 6 Step Process PacifiCorp along with the IOUs and SMJUs partnered collaboratively with the AFN Core Planning Team and have worked to engage the whole community and develop an overarching Statewide approach that meet the diverse needs of the individuals with AFN.

Access and Functional Needs is defined by the California Government Code §8593.3 as: *“individuals who have developmental disabilities, physical disabilities, chronic conditions, injuries, limited English proficiencies, who are non-English speakers, older adults, children, people living in institutional settings, or those who are low income, homeless, or transportation disadvantaged, including but not limited to, those who are dependent on public transit and those who are pregnant.”*

Recognizing this is a very broad audience, this plan will focus on minimizing the impact of a power shutoff on electricity dependent individuals (as defined on page 5 above) with AFN. To understand these impacts, the Joint IOU AFN Advisory Council developed a preliminary understanding of the term “electricity dependent.” This preliminary definition is intended to help inform new/enhancements to the programs and resources that are currently available (see section 1.3 below.)

The utilities are filing individual versions of their 2022 AFN plans to include territory-specific details for meeting the needs identified by the Core Planning Team. The comprehensive plans reflect the geographical differences as well as the diverse needs of the AFN community, while optimizing opportunities for consistency statewide.

### **1.3 Situation Overview**

#### **1.3.1 Hazard Analysis Summary – Definition of Risk**

*FEMA Step 2: Understand the Situation.*

*Understanding the consequences of a potential incident requires gathering information about the potential AFN of residents within the community.*

“Understand the Situation” continues with identifying risks and hazards. The assessment helps a planning team decide which hazards or threats merit special attention, what actions must be planned for, and the resources likely to be needed.

The key risk identified by the Core Planning team is *“Individuals with AFN are unable to use power for devices/equipment for health, safety, and independence due to an unexpected PSPS or are unprepared for a PSPS.”*

Disruption in power can have a disproportional impact on individuals with AFN. Power dependance is dynamic, on a continuum and may rapidly intensify over time.

- Immediate – Power dependency quickly becomes a crisis in <2 hours (e.g., breathing equipment, someone dependent on critical respiratory equipment).
- Situational – Secondary emergency that quickly becomes a crisis (e.g., elevators to exit their home, someone trapped, and a fire starts and can’t get out. Also, when the power gets shutoff might be a factor (e.g., in the evening for someone dependent on continuous positive airway pressure (CPAP)/ bi-level positive airway pressure (BiPAP) equipment for 8 hours).
- Longer term – Power dependency becomes a crisis in ~6 – 12 hours (e.g., temperature-controlled medication and environments, someone dependent on insulin that needs to be kept refrigerated).

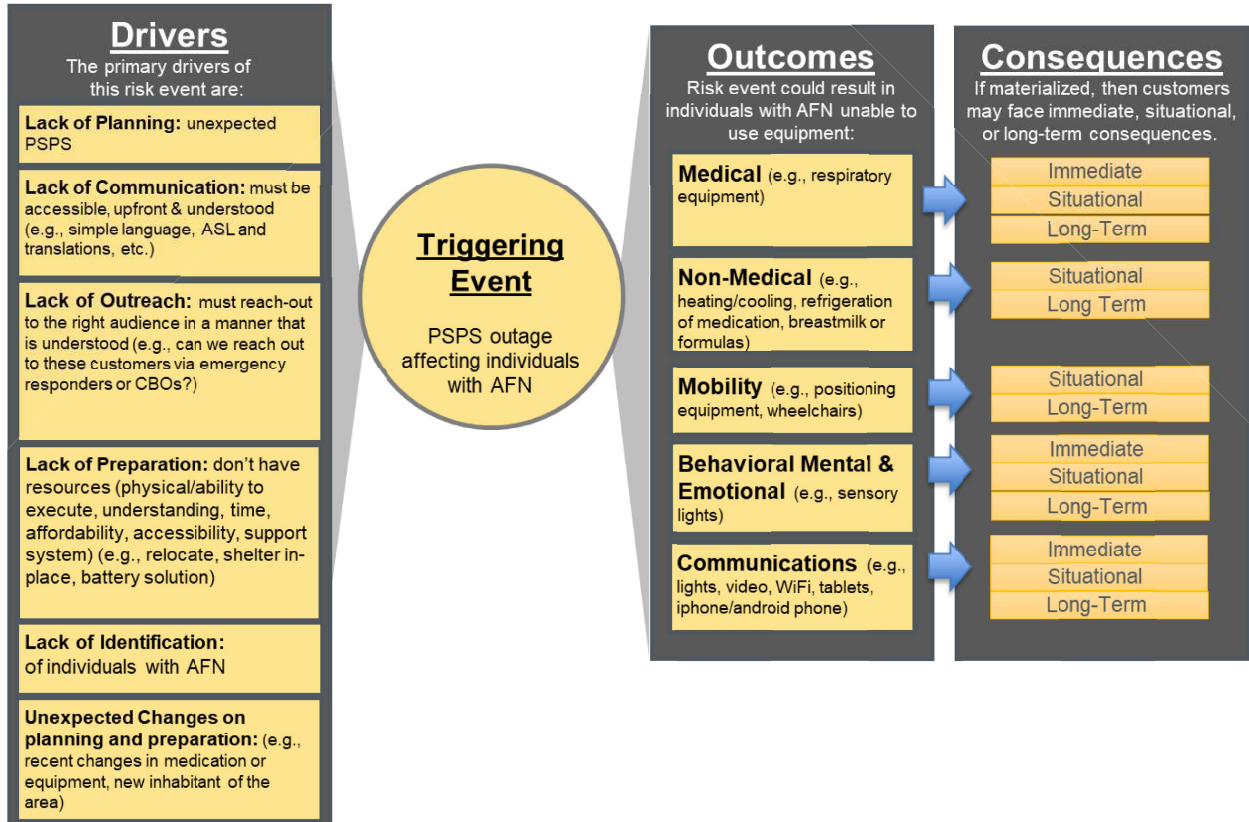
This assessment helps the planning team decide which hazards or threats merit special attention, what actions must be planned for and the resources likely to be needed.

#### **List of Risks and Hazards & Potential Consequences**

To further understand the risks and hazards, the AFN Core Planning Team conducted a Bowtie Risk Analysis Working Session to identify the drivers, outcomes, and consequences of an unexpected PSPS activation or outage on the health, safety, and independence of individuals with AFN. See the chart below for the output of the working session. This work product helps to illustrate the needs of the individuals with AFN extend well beyond medical devices alone and

the list of risks and are as diverse as the population and that the consequences can quickly change.

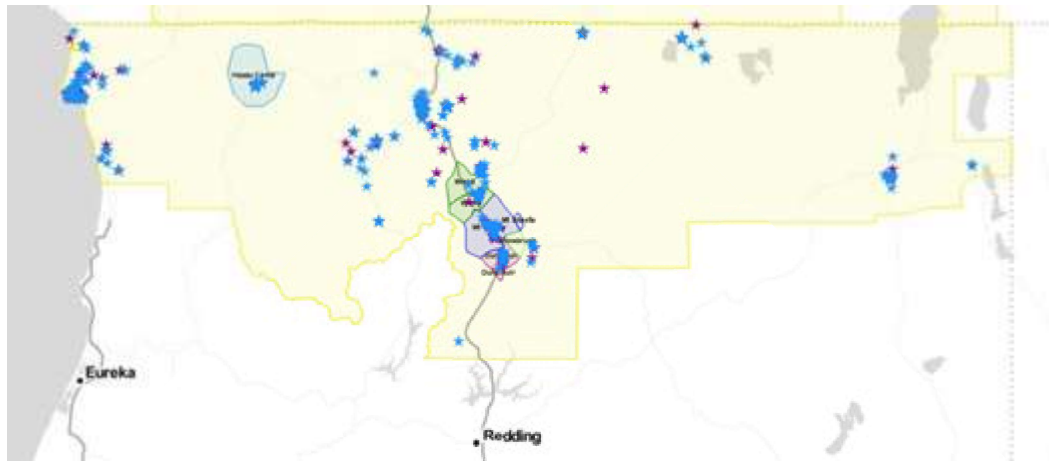
### Bowtie Analysis



### 1.3.2 AFN Population and Identification

PacifiCorp continues to seek improvements to identifying the electricity dependent customers with AFN through defining, mapping, and enabling self-identification, and has mapped their respective databases to flag customers with the following fields as “AFN”:

The map below identifies the location of AFN customers in the service territory shaded yellow. The two proactive de-energization zones (PDZs) are sectionalized into four areas, represented by different shades green, purple, blue, and red. The sectionalization limits the number of customers impacted by a PSPS as each section can be independently de-energized. PacifiCorp recognizes wildfire risk exists throughout the service territory and by expanding AFN identification outside the recognized Tier 3 PDZs, more self-identified AFN customers are prepared for a PSPS.



As a part of the planning process, the team worked to identify the targeted individuals and benchmark with state agencies to create an informed estimate of the number and types of individuals with disabilities and others with AFN residing in the community. The California Department of Developmental Services (DDS) for In-Home Support Services clients and the California Department of Social Services (DSS) for Regional Center clients provided the IOUs data through aggregated ZIP code counts. PacifiCorp participated in this exercise with limited success. Only 38 potential AFN customers were identified through this process.

The AFN Statewide Council and AFN Collaborative Planning Team have developed a definition of electricity dependent individuals that are the main target population this Plan seeks to support.

### 1.3.3 Capability Assessment

*FEMA Step 3: Operational priorities.*

*Specifying what the responding organizations are to accomplish to achieve a desired end-state for the operation.*

For this section, PacifiCorp collaborated with the SMJUs to identify existing resources/programs and identify gaps.

Resources		PacifiCorp	Liberty	BVES
<b>Community Resource Centers</b>	Wi-fi, ADA-accessible restroom, bottled water, snacks, charging, chairs, ice, event information & area/weather items	X	X	X
<b>Power Resiliency</b>	Portable backup batteries for Medical Baseline customers	X		
	Generator Rebate Program	X		
<b>Food Replacement</b>	Food Bank Partnerships			
	Meals on Wheels			
	Community Resource Center – Hot meals			
	Grocery Gift Cards		X	
	Food delivery			
<b>Transportation</b>				
<b>Lodging</b>			X	X
<b>IOU Customer Communications</b>	Annual Preparedness Outreach	X	X	
	In Language Materials	X	X	X
	Accessible Materials	X	X	X
	CBO Partners	X	X	X
<b>Training</b>	General Information	X	X	X
	Tabletop exercises and full-scale exercises	X	X	X
<b>Community Engagement</b>	IOU hosted events, Webinars, Advisory Boards, Working Groups	X	X	X
<b>PSPS Notifications</b>	Account Holders	X	X	X
	Non-Account Holders (PG&E/SDG&E Address; SCE Zip Code)	X	X	
	Broad: via multicultural media, CBOs, and social media	X	X	X
	Life Support/Critical Care	X	X	X

<b>Notification Confirmation (Phone retries &amp; in person doorbell rings)</b>	Medical Baseline	X	X	X
	Self-Certified Vulnerable Customer Status	X		

*FEMA Step 4: Plan Development - Develop and Analyze Courses of Action.*

*This step is a process of generating, comparing, and selecting possible solutions for achieving the goals and objectives identified in Step 3. Planners consider the requirements, goals, and objectives to develop several response alternatives. The art and science of planning helps determine how many solutions or alternatives to consider; what works in one territory might not be available and/or relevant in another territory.*

PacifiCorp worked to deliver consistent services and resource offerings:

<b>Objectives:</b>	<b>Current State with Enhancement:</b>
Identification of individuals who are electricity dependent	<ul style="list-style-type: none"> <li>● Collaborate with State and Community Based Organizations (CBOs) to leverage the common definition and identify targeted outreach opportunities</li> <li>● Continue to deploy and expand strategies to enhance identification of individuals with AFN: <ul style="list-style-type: none"> <li>○ Partner with state agencies, hospital associations, healthcare providers, and CBOs to identify targeted audiences</li> <li>○ Marketing to promote beneficial programs like Medical Baseline and CARE to reach individuals with AFN</li> <li>○ Marketing and outreach to encourage customers to self-identify as individuals with AFN</li> <li>○ Continue to promote the ability for customers to “self-certify/identify” as individuals with AFN/Vulnerable Customer status across new channels including websites</li> </ul> </li> </ul>
Establish communication plan that reaches all AFN segments	<ul style="list-style-type: none"> <li>● Provide communications in prevalent languages and preferred formats, including ASL communications (e.g., notifications, programs and resources information)</li> <li>● Partnering with state agencies, hospital associations, healthcare providers, durable medical equipment companies, multifamily dwellings, paratransit companies, and community-based organizations to further promote assistance programs</li> </ul>
Support AFN customers during a PSPS Event	<ul style="list-style-type: none"> <li>● Community Resource Centers staffed with emergency medical personnel and other services.</li> <li>● Call each AFN customer prior to an event, during an event, and after event to ensure the safety of the individual.</li> <li>● Incorporate a direct feedback loop with Incident Command and local Emergency Management.</li> </ul>

## Research and Surveys

PacifiCorp conducts two annual surveys, one pre- and one post-fire season. MDC is a research firm contracted to collect data from customers and to conduct interviews with CBOs. The goal is

to evaluate the impact of the company's communication campaigns, receive direct feedback from the CBOs on outreach, support, and process improvements, and to collect demographic information from our customers. Between November 15 and December 5 of 2021, five-hundred and seventy-nine surveys were completed: 505 web and 74 phone surveys. Key findings of the survey include:

- 61% are aware of wildfire safety communications. Pacific Power remains the primary sources for wildfire preparedness information, and personal preparedness and vegetation management remain the most common messages recalled.
- Among those who experienced PSPS, over three quarters (81%) say they received adequate notification and information to prepare for an event; timely and better communication are the main suggestions for improvement, followed by more channels of communication
- One quarter know whether their address is in the PSPS area, consistent with the findings of the survey from August 2021. Nearly one in five are aware of a map on Pacific Power's website.
- Of those relying on electricity for medical needs nearly one quarter (26%) are aware Pacific Power provides additional notices.

Please see Appendix A for more specific findings from the company's most recent survey.

#### 1.3.4 Success Measures and Metrics

The success of these efforts should be judged by applying measurable, objective, well-defined and consistent standards. PacifiCorp is committed to working with the SMJUs to develop a set of metrics specific to the smaller service territories with limited services, resources, and will incorporate the following Joint IOU's metrics in the next survey: number of AFN customers aware of services available during a PSPS, number of AFN customers able to use medical equipment during a PSPS, and number of customers utilizing PacifiCorp resources during a PSPS. To provide this information, a PSPS must occur in PacifiCorp's territory to survey AFN customers impacted by a PSPS.

#### 1.4 Planning Assumptions

- For most PSPS events, advance notice is provided,
- The scope of PSPS events can expand or contract rapidly in a short period,
- Effective support of individuals with AFN requires a whole community (i.e., utilities, CBOs, non-profits organizations, government agencies) approach, and
- PSPS events may occur concurrently with unrelated emergencies (e.g., active wildfires, cyber-attacks, technological hazard incidents).

## 2. CONCEPT OF OPERATIONS

### 2.1 Preparedness/Readiness (Before Power Shutoff)



*FEMA Step 5: Preparation and implementation of the AFN plan.*

**2.1.1 AFN Identification Outreach**

PacifiCorp continues to refine and enhance both identification of AFN customers and ongoing communication targeted to reach more AFN customers. While all medical baseline customers are identified as AFN customers, in 2022, PacifiCorp intends to increase outreach to all customers to identify more customers relying on medical equipment and to broaden the scope of customers who self-identify as AFN. Customers will receive communications about the medical baseline rate and a Spanish version of the medical baseline application will be available on the website this year.

California Alternate Rates for Energy (CARE) applications are sent to all residential customers. In 2021, PacifiCorp added a check box on the CARE application asking customers to identify as AFN. The check box added an additional 193 AFN customers throughout the service territory and 43 AFN customers in the Power De-energization Zones (PDZs). In the company’s last annual AFN Plan filed in February 2021, PacifiCorp reported 61 AFN customers including medical baseline located in the PDZ. In February 2022, the number of baseline and non-baseline customers in the PDZ increased to 123 with an additional 344 AFN customers outside of the PDZ and an additional AFN customer located outside the PDZ.

**2022 AFN Customer Counts**

<b>PSPS De-Energization Zone</b>	<b>Medical Baseline AFN</b>	<b>Non-Medical Baseline AFN</b>	<b>Total</b>
<b>Inside</b>	26	97	123
<b>Outside</b>	77	267	344
<b>Total</b>	103	364	467

**2.1.2 AFN Support Resources**

PacifiCorp AFN customers can access information on wildfire preparedness and programs through communication campaigns, outreach, personal contact and following when an event is forecasted on the company’s website. PacifiCorp’s AFN and wildfire support programs are identified below.

**2.1.3 Back-Up Power**

**Portable Battery or Generator Rebate Program<sup>1</sup>**

PacifiCorp offers a generator rebate for residential customers residing in a high fire threat district. All customers are eligible for a \$200 rebate for the purchase of one generator or portable battery. CARE and medical baseline customers are eligible for a \$400 rebate. Both tenants and property owners may receive the rebate.

**Medical Baseline Portable Battery Program**

PacifiCorp offers free portable batteries to eligible medical baseline customers. PacifiCorp offers delivered free-to-the-customer portable batteries to medical baseline customers and

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<sup>1</sup> <https://www.pacificpower.net/outages-safety/storm-emergency-preparedness/backup-generators.html>

prioritizes those located within the PDZ zones. The program includes the procurement of contracted services to provide the portable battery, up front technical evaluation of the customer's unique needs to specify the correct device education and technical support to the customer once installed. Each customer receives individual education upon installation and remote technical support as needed. Batteries were successfully delivered to all registered medical baseline customers in PSPS zones by December 2021. Phase 2 of the program began in January 2022 and will expand to remaining areas within the service territory. The goal is to deliver an additional 50 batteries by the end of 2022.

### Resiliency Efforts and Surveys

PacifiCorp offers grants to communities seeking to enhance emergency preparedness with renewable generators and energy storage and to provide additional support to emergency responders during PSPS.<sup>2</sup> An assessment of available funding is ongoing to determine the timeline for a reopening in 2022.

- Grants allow for the procurement of portable renewable generators to community emergency managers and first responders. The primary use of the generators is to provide the ability for at-risk community members to shelter in place during a resiliency event. Organizations interested in receiving funding need to develop and provide a deployment plan for the generators that receive funding.
- Technical assistance grants provide communities a comprehensive technical study of the potential costs, benefits, and requirements to add energy storage to critical facilities.
- Grants for the installation of energy storage are available for communities seeking to improve resiliency during an emergency. A project host must be one of the following types of facility: police stations; fire stations; emergency response providers as defined in D.19 05 042; emergency operations centers; 911 call centers, also referred to as Public Safety Answering Points; medical facilities including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers and hospice facilities; public and private gas, water, wastewater or flood control facilities; jails and prisons; locations designated by the utility to provide assistance during a PSPS event; cooling centers designated by state or local governments; and, homeless shelters supported by federal, state, or local governments; grocery stores, corner stores, markets and supermarkets that have average annual gross receipts of \$15 million or less as calculated at a single location, over the last three tax years; independent living centers; and, food banks. The goal is to improve access to services for AFN customers during a PSPS.

### 2.1.5 Emergency Coordination Centers

#### **Preparation Exercises**

When a PSPS is forecasted, PacifiCorp immediately opens an Emergency Coordination Center (ECC) with an ECC Manager to oversee all aspects of the response. The process is reviewed and available in the annual GO 166 report, provided as Appendix B.

PacifiCorp has established an Emergency Coordination Center (ECC) following National Incident Management System (NIMS) guidance. The ECC staff is available to support all

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<sup>2</sup> <https://www.pacificpower.net/community/community-resiliency.html>

hazards responses to include PSPS events. The ECC plays a vital role in monitoring and verifying AFN customers are contacted prior to an event. The status of each AFN customer impacted by a PSPS is provided to the ECC Manager to determine if additional action by the company or local emergency management is required to support the AFN customer.

#### *Training and Exercise*

PacifiCorp conducts annual emergency plan reviews, and exercises and all agencies are invited to attend. Representatives from County Public Health Departments are invited and attend pre-fire season tabletop exercises.

PacifiCorp is currently enhancing and expanding the training program for ECC staff. The training standards are being developed in conjunction with other California based utilities and the California Office of Emergency Services.

PacifiCorp conducts annual PSPS exercises utilizing a whole community approach annually. During exercise planning, emergency management agencies from tribal, state, county and local jurisdictions, community-based organizations, public health agencies, and any other potentially affected agency are invited. Additional plans for training and PSPS exercises will be reported in the company's upcoming post-season PSPS report as required by D.21-06-034.

#### *AFN Liaison*

Contacting AFN customers is embedded in ECC Process. The number of customers with AFN is identified through a GIS customer list and is provided to the ECC Manager. During each ECC meeting an update is provided to the ECC Manager and any issues or concerns are escalated to the local Emergency Manager.

#### 2.1.6 PSPS Preparedness Outreach and Community Engagement

Dissemination of timely, accurate, accessible and actionable information to the public is important in all phases of PacifiCorp's incident management. Communications efforts are listed in the WMP, Emergency Response Plan and PSPS Playbook which provide both messaging and cadence for public and stakeholder communications throughout the preparation, response and restoration cycle. Communication with AFN customers and external stakeholders as early as possible is essential. The PacifiCorp Joint Information System consists of processes and tools to facilitate communication with the public, news organizations, government entities and external stakeholders through social media, website restoration information, press releases and notification protocols while ensuring the messaging is consistent and comprehensive.

#### *AFN Public Education and Outreach*

PacifiCorp provides additional PSPS notifications to individuals classified as medical baseline customers in PacifiCorp's customer service system and to individuals who self-identify as having access and functional needs (AFN). Having key messages across a number of communications channels and materials asking AFN customers to self-identify with the company is a central component to the company's community engagement and customer outreach strategy.

PacifiCorp has engaged a vendor to survey AFN population to help inform the company's communication outreach related to those customers, this includes assessing the need and type of communications for people with disabilities who may not be able to use standard forms of communication. Survey data has informed the overall strategy and the company has adjusted and expanded where key messages are disseminated to increase AFN self-identification.

One method used by the company to increase the likelihood AFN populations receive relevant information is by partnering with local and regional agencies that frequently interact with the same customer segment. An example is PacifiCorp's partnerships with CBOs Del Norte Senior Center and Great Northern Services to distribute wildfire safety brochures to households in Crescent City and Weed. The brochures are provided in English and Spanish, and a key message encourages customers to contact the company to self-identify as having medical needs dependent on electricity. PacifiCorp has also engaged in meet and confer sessions planned with the parties in this proceeding to coordinate outreach efforts related to CBOs.

#### *Accessibility of Communications*

Pre-fire season, PacifiCorp distributes brochures to Community Based Organizations, Tribal Authorities, companies providing medical equipment, local governments, and community centers receive brochures to distribute to customers and clients. The brochure provides information on resiliency for medical equipment, wildfire preparedness, how to identify as AFN, and the medical baseline program. Outreach is available in multiple languages including Chinese traditional, Chinese simplified, Tagalog, Vietnamese, Mixteco, Zapoteco, Hmong, German, and Spanish.

The company's customer care agents have access to and training with wildfire safety and preparedness and PSPS-related communications and can facilitate a conversation between the customer and translation service to ensure the customer receives the wildfire safety and preparedness and PSPS-related information they need.

#### *CBO Outreach*

Additionally, PacifiCorp, through a third party vendor, MDC Research, conducts annual online and phone surveys with customers, including independent living, assisted living and skilled nursing centers and AFN representatives and CBOs (Family and Community Resource Center of Weed, Mount Shasta CRC, Dunsmuir CRC, Happy Camp Family/CRC, Yreka CRC, HUB Communities, Tulelake/Newell FRC, Scott Valley CRC, Helping Right Now, among others) located in potential PSPS areas regarding the company's PSPS and wildfire safety communications.

In-depth interviews conducted with CBOs in PacifiCorp's California service area took place in Fall 2022. The interviews lasted 30 minutes and were conducted virtually. Key findings include:

- CBOs often do receive communications and resources from PacifiCorp related to CARE and provide low-income residents with support for paying their electric bills.
- Most communications and resources received about wildfires (from any organization, including government or fire agencies) have been focused on evacuation preparedness, with limited information about general safety or preparation for PSPS events.

- Most report that wildfire safety, preparedness, and PSPS communications are outside the scope of their charter; they would be willing to help spread the word, but typically do not have the available resources to do so without further support.
- The most common methods CBOs currently use to communicate with the community are social media, in-person visits or meetings, and through handing out flyers when clients visit the office.
- General fire safety information is least impactful, as other agencies are already providing information about brush clearing and steps required to mitigate fire risk.
- Special attention should be paid to those with medical needs and limited transportation options; they are most at risk during a PSPS event.

These findings help to inform and evolve how PacifiCorp utilizes CBO communication channels without adding extra burden to these organizations. Thus, the company is seeking additional messaging avenues outside of its currently defined outreach strategy. This involves working with community partners to find appropriate places and spaces to add AFN-specific messages to existing platforms such as CBO emails, brochures, webpages and/or social media pages. This work is ongoing and is carried out by the company’s regional business managers who collaborate closely with their community stakeholders, or through direct outreach to community organizations by company corporate communications staff.

*Tribal Engagement*

The Karuk Tribe is located in a high fire consequence area of Siskiyou County. Representatives from the tribe are actively engaged to participate and are standing members in the PacifiCorp Wildfire Advisory Council. PacifiCorp’s regional business manager conducts bi-weekly calls with the Tribe’s leadership to quickly address any issues as they arise and to discuss PacifiCorp’s operations in the area including wildfire mitigation and PSPS. A representative from the Karuk Community Center was interviewed as part of the semi-annual survey. PacifiCorp will conduct interviews with the tribe as part of the semi-annual survey.

2.1.7 Community Resource Centers (CRCs)

Planning and Standards

PacifiCorp has developed CRC locations and plans which include provisions in accordance with the Americans with Disabilities Act. CRCs are located in areas which will be easy to access. When activated, the CRCs will be listed on the company public website.

All CRC locations were chosen by location through collaboration with local emergency managers. CRC locations are then vetted using a checklist that was developed with guidance from Public Utilities Commissions and the current Americans with Disabilities Act Checklist for Emergency Shelters to ensure CRC services are equitable and accessible for medical baseline and access and functional needs populations. Services/resources provided include:

<ul style="list-style-type: none"> <li>✓ Shelter from environment</li> <li>✓ Air conditioning</li> <li>✓ Air Purifiers &amp; Air Quality Monitors</li> <li>✓ Potable water &amp; Non-perishable snacks</li> <li>✓ Seating and tables</li> </ul>	<ul style="list-style-type: none"> <li>✓ Communications capability such as Wi-fi access, Satellite Phone, Radio, Cellular phone etc.</li> <li>✓ On-site medical support (EMT-A at a minimum, Paramedic preferred)</li> </ul>
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<ul style="list-style-type: none"> <li>✓ Restroom facilities</li> <li>✓ Refrigeration &amp; Heating for medicine and/or baby needs</li> <li>✓ Interior and area lighting</li> <li>✓ On-site security</li> <li>✓ Televisions</li> <li>✓ Ice and Water</li> </ul>	<ul style="list-style-type: none"> <li>✓ Charging stations for Cell Phones, AM/FM/Weather radios, computers, etc.</li> <li>✓ Small Crates for Pets</li> <li>✓ AFN/LEP Population support</li> <li>✓ Personal Protective Equipment</li> <li>✓ Portable ADA Ramp</li> </ul>
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## 2.2 PSPS Activation (During – Emergency Operation Center activated)

### 2.2.1 PSPS Communications

#### *All Customers*

PacifiCorp’s Public Safety Power Shutoff event communication and notification plan has two primary systems. First, direct communications, through pre-identified channels, are used to provide detailed notices to key stakeholders, namely public safety partners and critical facilities and critical infrastructure. Second, a series of automated notices (email, text and direct phone calls) to customers, together with published information on the company’s website, social media channels, and proactive media outreach, are employed to provide notice to the general public at critical stages of the PSPS process, including for pre-event warnings, an actual event, and re-energization.

#### *AFN Customers*

When a PSPS event is forecasted, a list of impacted customers is extracted from the GIS system. AFN customers are identified, and the list is provided to employees for personal phone calls to each customer. PacifiCorp has sectionalized high fire consequence areas into small zones for possible de-energization. By reducing the number of customers affected by an event, the number of AFN customers is subsequently reduced. The smaller numbers allow PacifiCorp to personally reach out to each AFN customer. The results of the contact are reported to the ECC Manager. Contact occurs prior to an event, at the beginning of re-energization, and after energization is completed. If the AFN customer needs additional assistance, the ECC Manager can quickly relay the information to the county’s emergency manager.

#### *Website*

To ensure that the public can access timely and detailed information about both potential and actual PSPS events relevant to a particular location, PacifiCorp has modified its main PSPS webpage, available at [www.pacificpower.net/psps](http://www.pacificpower.net/psps). A web-based tool allows members of the public to enter an address into a search bar to determine if that address is in an area which may be subject to a PSPS. An additional online tool is available for members of the public to see the “Public safety power shutoff forecasting” for that area over the following week. The status indicates whether the area is operating as “Normal,” whether there is a PSPS “Watch,” or whether there is an actual PSPS “Event.” Additionally, the company is in the process of building out the weather section of this page to give visitors more insight into real-time weather monitoring through its network of field weather stations. This will consist of language on the page explaining the company weather station network and a link to the PacifiCorp weather page.

PacifiCorp has ensured it has the bandwidth to manage its PSPS website, even under the extremely remote potential that all proactive de-energization zones in PacifiCorp’s service territory would be de-energized at the same time. When there is an event, transmission & distribution operations Emergency Coordination Center personnel takes on the role of updating

the PSPS website. The company's PSPS website is fundamentally a content only (with PSPS area polygons imposed on maps) static site with no dependency on any backend applications. PacifiCorp's website performed well serving content during the September 2020 windstorm event where a significant surge in web visits – 200,000 + web visitors with more than 1.6 million web page views. This event demonstrated capable broadband performance.

#### *PSPS Customer Notifications*

- Multiple communication channels are used for customer notifications:
  - Outbound Calls
  - Social Media Updates
  - Texts and emails
  - Website update
  - Press Release
  - Personal phone calls to AFN customers

### **2.3 Recovery (After – Power has been restored)**

#### **2.3.1 AFN Support**

AFN customers are contacted by an employee of the company after the power is restored. It is a continuation of the ongoing contact prior and throughout a PSPS event. The check-in ensures no additional support is needed for the customer after the power is restored.

#### *After Action Reviews and Reports*

As with any other incident or event, after action reports are completed for PSPS responses. These reports provide an opportunity to identify what went well during the event execution and where improvements are needed. Additionally, the California Public Utility Commission requires a specific post-event report to be filed with them in compliance with Resolution ESRB-8.

#### *Lessons Learned and Feedback*

PacifiCorp uses all events and incidents to gain feedback and identify future opportunities for improvement. As a part of the company's internal improvement cycle the feedback and identified improvement opportunities are key measurements PacifiCorp uses to make corrections and adjust plans. Semi-Annual customer surveys and ongoing reporting provide routine feedback and measurement of PacifiCorp's performance before, during, and after an event.

### **3. INFORMATION COLLECTION, ANALYSIS AND DISSEMINATION**

#### **3.1 Customer Privacy**

PacifiCorp has contracts with three CBOs in California to share customer information. The information transfer is protected and is used to assist with CARE recertifications, weatherization programs, and receipt of energy assistance. No other agreements for customer information sharing exist with local agencies, government agencies, or health providers.

### **4. AUTHORITIES AND REFERENCES**

#### **4.1 Annual Report and Emergency Response Plan in Compliance with General Order 166.**





## 5. CHANGE RECORD

### *FEMA Step 6: Implement and Maintain the Plan*

As PacifiCorp implements the 2022 AFN Plan, quarterly updates will be provided to the California Public Utility Commission. Revisions to the change will be tracked each time the plan is modified. It describes the revisions made, the locations of the revisions, the names of the persons responsible for the revisions, and dates of revisions:

Section	Person Responsible for Revision	Change	Date