

San Diego Gas & Electric Company's Second Progress Report on Implementation of De-Energization Guidelines

March 4, 2020



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I. Introduction

Pursuant to Ordering Paragraph (OP) 3 of California Public Utilities Commission (Commission or CPUC) Decision (D.) 19-05-042, San Diego Gas & Electric Company (SDG&E) submits this second report detailing its progress towards implementation of the de-energization guidelines set forth in Appendix A of D.19-05-042 (Guidelines).¹ A copy of this progress report is being provided to the Director of the Commission's Safety and Enforcement Division (SED), served to the service list of Rulemaking (R.) 18-12-005, and posted to SDG&E's website.

SDG&E has an obligation to operate its system safely. This obligation requires SDG&E to de-energize (i.e., turn off) power lines when necessary to protect public safety (Public Safety Power Shutoff or PSPS). SDG&E is authorized to do so under California Public Utilities Code (P.U. Code) §§ 399.2(a) and 451, as well as Commission decisions, including D.12-04-024, Resolution ESRB-8, and D.19-05-042. Any decision to de-energize power lines for public safety is made in consultation with SDG&E's Emergency Operations Center (EOC), Meteorology, and Electric System Operations leadership.

SDG&E has been utilizing PSPS since 2013 as a measure of last resort to prevent catastrophic wildfires and reduce wildfire risk. Since that time, SDG&E has developed a suite of tools to enhance its PSPS decision-making. For instance, SDG&E leverages its Fire Potential Index, its weather network, the Santa Ana Wildfire Threat Index and Wildfire Risk Reduction Model to ensure that its decisions are based on a detailed and highly localized understanding of the situation and risk posed by specific weather events. More recently, SDG&E's analysis of 95th and 99th percentile wind speeds at its weather stations, and its Vegetation Risk Index, have led to further refinements. SDG&E is also able to minimize the scope of PSPS events through technologies it has deployed on its electrical system, such as sectionalizing devices.

Additionally, SDG&E manages and mitigates the impacts of PSPS events through collaboration with key stakeholders and by implementing voluntary and CPUC-mandated mitigation measures, including extensive notification efforts. As a result of its experience and efforts, SDG&E has the best in class PSPS program among the California utilities. Accordingly, SDG&E submits that, as the Commission weighs enhancements or other measures that may be appropriate for other utilities, it should recognize that SDG&E stands apart in important respects.

SDG&E appreciates this opportunity to share the additional progress it has made towards complying with the PSPS requirements established by the Commission in D.19-05-042. This

¹ D.19-05-042 at OP 3 provides that the electric utilities "must submit two progress reports detailing progress towards implementation of the guidelines set forth in Appendix A." The first progress report is due three months after issuance of D.19-05-042, which SDG&E submitted on September 4, 2019. The second progress report is due nine months after issuance of D.19-05-042, which is March 4, 2020.

report maps to and follows the sequencing of the Guidelines for ease of reference and builds upon the efforts described in SDG&E's first progress report (dated September 4, 2019). Specifically, rather than repeat the activities SDG&E undertook to comply with the Guidelines, this report describes the incremental efforts taken since September 4, 2019.

II. Overarching Guidelines

This section describes SDG&E's incremental efforts (since September 2019) to educate customers on its PSPS programs and coordinate and collaborate with state and local jurisdictions, agencies, and first responders before, during, and after PSPS events.

A. Customer Education & Outreach

In 2020, SDG&E will expand its current PSPS public education initiatives and add new initiatives based on solicited feedback from customers, key stakeholders, public safety and community partners. In addition to increasing the multi-faceted approach to maximize the reach and impact of customer education efforts, SDG&E will continue to closely collaborate with public agencies, community-based organizations (CBOs) and community critical networks, such as the San Diego County Access and Functional Needs (AFN) Working Group.

The public education campaign will continue to support expanded outreach efforts. In 2019, SDG&E held Wildfire Community Open House and Resiliency Fair events, which were well-received and successful. Additional Open House and Resiliency Fairs are planned for the spring and summer of 2020. These forums will focus on communities affected by PSPS events in 2019, and SDG&E will increase the number of these events to no less than 15 forums. As SDG&E continues to build its relationships within the communities affected by PSPS, SDG&E has been invited to participate in community events to provide education on wildfire mitigation efforts. SDG&E's representation includes Wildfire Resiliency & Operations, Meteorology, Generator Safety, Emergency Management and other internal groups that are subject matter experts with respect to preparedness, resiliency and safety. Beyond its 15 scheduled SDG&E events, SDG&E has an additional six requests, to date, to partner within their community preparedness events.

During these community forums, SDG&E provides customers and the public with information about SDG&E's PSPS program, assistance with updating their contact information for PSPS notifications, meteorology overviews on situational awareness and tools used for decision-making, guidance on how to receive or access current information during events, and information on services and resources, such as Community Resource Centers (CRCs), generator programs, mobile pantries for food dependency, etc. SDG&E also hosts representatives from the American Red Cross, local Fire Safe Councils, the Community Emergency Response Team (CERT) Program, 2-1-1 San Diego, California Department of Forestry and Fire Protection (CAL FIRE), County of San Diego Office of Emergency Services (County OES), tribal fire departments, and other CBOs to provide information and education on emergency preparedness and resiliency.

As an additional outreach measure, SDG&E provides PSPS information updates to all fire and law enforcement agencies within its service territory as part of an ongoing First Responder training and exercise program.

SDG&E is also expanding its reach to notify non-customers and the general public. In previous years, event notifications were directed to SDG&E account holders. This expansion will benefit residents within SDG&E's service territory, stakeholders, non-residents and non-account holders (for instance friends and family who reside outside the region). This tool can also be utilized by residents in master-metered accounts, such as mobile home parks. SDG&E created a new portal to register members of the public without primary SDG&E accounts to receive PSPS notifications based on the zip code(s) they select. Event notifications will be sent to enrollees based on their pre-identified selections (i.e., voice, text and/or email). Promotion of the new portal will be included in SDG&E's 2020 public education campaign.

SDG&E will increase public education efforts in 2020 based on direct solicited feedback from customers, communities and key stakeholders. Additional investment will be made in mass-market communication channels (e.g., radio, television and print) and expanded safety, preparedness and resiliency messaging will be promoted year-round, not just during "fire season." Tools such as SDG&E's new wildfire safety documentary and public service announcement (PSA) spots will be utilized in the broadened mass-market promotional campaign. Public relations communications, including media, will complement the outreach promotional campaign in order for consistent and aligned OneVoice messaging to take place across multiple communication channels at the same time.

SDG&E is also examining data to identify the primary languages for the region. Expanded in-language communications will be put in place in 2020 for prevalent languages spoken in the territory. The public education campaign will incorporate additional languages as well as PSPS notifications for account and non-account holders.

Since its September 2019 progress report, SDG&E finalized and launched its AFN toolkit in the form of a landing web page that provides resources to assist the AFN communities, particularly for PSPS events (<https://www.sdge.com/AFN>). The page provides information and links for: PSPS notification registration; Emergency plan/kit checklists, generator safety; Medical Baseline program and application; California Alternate Rates for Energy (CARE); Family Electric Rate Assistance (FERA); and Energy Savings Assistance Program (ESA). SDG&E worked with its network of CBOs to share the information to their constituents through their email distribution lists, newsletters and social media.

In 2020, SDG&E will continue to build upon its collaborations with agencies and organizations, such as 2-1-1 San Diego and the San Diego County AFN Working Group, who have well-established and trusted communication protocols to reach various subsets of community populations, including vulnerable populations. Additionally, many of these organizations are equipped to assist with message translation and amplification. Efforts will also be increased to

communicate to low-income customers and residents about the risk of wildfire, PSPS awareness, PSPS notification registration and resources and programs available to them to help mitigate the impacts of PSPS events.

Lastly, SDG&E partnered with County OES and 211 San Diego to develop direct mail pieces to promote resources and services available to the public through 211 San Diego and provide awareness and education of SDG&E's Medical Baseline Program. Direct mail outreach was sent to over 25,000 residents in the region and utilized the U.S. Department of Health and Human Services emPOWER database list.

B. Coordinating with State and Local Jurisdictions and Agencies

In addition to continuing the work outlined in SDG&E's September 2019 Progress Report, SDG&E has continued to work with its local jurisdictions and agencies to prepare and educate on PSPS events. Examples of the additional work SDG&E has done include PSPS After Action meetings and emergency manager meetings with local jurisdictions and public safety partners, to further educate and collaborate on PSPS events. As discussed above, SDG&E has begun scheduling Wildfire Safety Fairs, Open Houses and participation in community events in 2020. These events are coordinated with local agencies (e.g., 2-1-1, CERTs, fire departments, Feeding San Diego) and demonstrate the regional collaboration necessary for wildfire mitigation and PSPS response. Within the last wildfire season, SDG&E also began, and will continue, coordination with the California Governor's Office of Emergency Services (CalOES) Office of Tribal Affairs during PSPS events.

C. Coordinating with Other Electric IOUs

SDG&E subject matter experts from multiple business lines across the company continue to participate in weekly and bi-weekly calls with the other California electric investor owned utilities (IOUs) to discuss lessons learned, share best practices, align on outreach processes, share best practices and consider innovative emerging technologies within the scope of communications and outreach.

III. Adopted Definitions

Regarding AFN populations, the Commission acknowledged in D.19-05-042 (at 81) that the electric utilities will be unable to identify and notice all AFN populations and must rely upon local and state jurisdictions to assist in this effort. SDG&E appreciates and understands the importance of outreach to AFN populations and continues to partner with local and statewide CBOs and agencies to reach the AFN population to encourage them to sign-up for notifications and enroll in SDG&E's Medical Baseline program.

Regarding critical infrastructure customers (as defined by D.19-05-042), SDG&E has identified them and continues to perform outreach to those that have an account manager, as well as those who are small businesses and harder to reach. SDG&E is actively involved in Phase 2 of

the De-Energization rulemaking proceeding (R.18-12-005), which, among other things, is considering expanding and adding new industries to the definition of critical infrastructure. Should the definition be modified, SDG&E will be ready to identify new customers as needed.

IV. Who Should Receive Notice and When Should Notice Occur?

A. Notification and Priority

SDG&E implemented the Phase 1 De-Energization Guidelines and successfully utilized them during its 2019 PSPS events. While there have been no significant changes since SDG&E's September 2019 Progress Report related to PSPS notification and priority, SDG&E notes that it continues to look for opportunities to improve notifications. One improvement made during the 2019 season was adding Caltrans leadership and operations teams to SDG&E's Public Safety Partner database to receive Public Safety Partner notifications.

In addition, during its 2019 PSPS events, SDG&E worked with several CBOs who have databases with customer information to amplify SDG&E's PSPS notifications to AFN populations. Additionally, SDG&E partnered with County OES AFN Working Group and Partner Relay Network who shared SDG&E's PSPS notifications to their network of CBOs during the events.

B. Timing of Notification/ Responsibility for Notifications

Regarding the timing of notification and responsibility for notifications, there have been no significant changes since SDG&E's September 2019 Progress Report. As conditions permitted, SDG&E successfully and timely provided PSPS notifications during its 2019 PSPS events, consistent with the Phase 1 De-Energization Guidelines.

V. How Should Different Customer Groups be Identified?

A. First/Emergency Responders/Public Safety Partners

SDG&E continues to value its relationships with first/emergency responders and Public Safety Partners within its service territory. All relevant contacts and contact lists are robust, and regularly maintained to remain up to date. There have been no significant changes in this area since SDG&E's September 2019 Progress Report.

B. Critical Facilities and Infrastructure

SDG&E continues its outreach with critical facilities and infrastructure to ensure understanding of SDG&E's new notification processes and their operational readiness for future emergencies, to include PSPS. SDG&E is actively participating in Phase 2 of the De-energization rulemaking proceeding (R.18-12-005) and is ready to quickly react if new industries are added to the definition of critical facilities and infrastructure. SDG&E also continues to update contacts in preparation for the up-coming fire season.

C. Access and Functional Needs Populations

Since its September 2019 Progress Report, SDG&E has continued to partner with statewide and local CBOs to reach AFN populations within its service territory. As mentioned above, during its 2019 PSPS events, SDG&E worked with several CBOs who have databases with customer information to amplify SDG&E's PSPS notifications to AFN populations. Additionally, SDG&E partnered with the County OES AFN Working Group and Partner Relay Network who shared SDG&E's PSPS notifications to their network of CBOs during the events.

Since the last progress report, SDG&E has also finalized and launched its AFN toolkit in the form of a landing web page that provides resources to assist the AFN communities, particularly for PSPS events (<https://www.sdge.com/AFN>). The page provides information and links for: PSPS notification registration; Emergency plan/kit checklists, generator safety; Medical Baseline program and application; CARE; FERA; and ESA. SDG&E worked with its network of CBOs to share the information to their constituents through their email distribution lists, newsletters and social media.

Additionally, SDG&E partnered with County OES and 2-1-1 San Diego to develop direct mail pieces to promote resources and services available to the public through 2-1-1 San Diego and provide awareness and education of SDG&E's Medical Baseline Program. The direct mail outreach was sent to over 25,000 residents in the region and utilized the U.S. Department of Health and Human Services emPOWER database list.

SDG&E is continuing to work with County OES to insert two pages of information about PSPS, back up generation needs, the MBL, ESA, CARE and FERA programs into their "Disaster Preparedness Plan for People Who May Need Assistance and Their Caregivers." SDG&E also plans to staff an SDG&E table at County OES' upcoming AFN Symposium.

SDG&E is also working closely with County OES who recently launched their new Neighborhood Evacuation Teams (NET) which consist of CERT members. These CERT members will assist their vulnerable neighbors in completing a Disaster Preparedness Plan, specifically created for people who may need assistance and their caregivers. The focus will be on evacuation planning and identifying several points of contact for assistance during an emergency. This has been rolled out as a pilot program and SDG&E intends to continue to work closely with the CERT teams and County OES so vulnerable customers have plans in place during PSPS events.

In addition, to working with CBOs to help identify AFN Populations, SDG&E has begun outreach to Master Metered Mobile Home Parks. These efforts have focused on promoting the non-account holder notification sign-up, which allows them to receive PSPS notifications directly by zip code(s).

To provide clarification from its last progress report, SDG&E sends a notification (not a quarterly letter) to all participating Medical Baseline customers at the time of their renewal requesting them to re-certify for the program, update their preferred contact information, and

to provide an alternative means of communications in case of planned or rotating power outages.

In 2020, SDG&E plans to launch an Access and Functional Needs Advisory Council (AFNAC). The AFNAC will be a working group comprised of leaders representing a broad spectrum of CBOs who serve seniors, disabled residents, medical baseline customers, and other residents affected by de-energization. The AFNAC will provide a forum for community-based leaders who serve the AFN population to provide constructive input and feedback on SDG&E and the region's efforts to meet their communities' needs and help identify AFN customers. Additionally, SDG&E is working with the IOUs and CalOES to form a Statewide AFN Advisory Council, which will be made up of key stakeholders, to advance the mission of each of the IOUs by providing independent expertise to help ensure that customer programs incorporate best practices to improve service now and in the future.

SDG&E has also formed a dedicated, cross-functional team aimed to minimize PSPS impacts to customers, particularly the vulnerable populations located in the HFTD. A heavy emphasis of the project team will be placed on creating or advancing mutually beneficial collaborative efforts with CBOs and agencies that have existing relationships with vulnerable populations and programs in place to assist them.

D. All Other Customers

As discussed above, SDG&E is also expanding its reach to notify non-customers and the general public. In previous years, event notifications were directed to SDG&E account holders. This expansion will benefit residents within SDG&E's service territory, stakeholders, non-residents and non-account holders (for instance friends and family who reside outside the region). This tool can also be utilized by residents in master-metered accounts, such as mobile home parks. SDG&E created a new portal to register members of the public without primary SDG&E accounts to receive PSPS notifications based on the zip code(s) they select. Event notifications will be sent to enrollees based on their pre-identified selections (i.e., voice, text and/or email). Promotion of the new portal will be included in the SDG&E's 2020 public education campaign.

VI. What Information Should be Included in Notifications in Advance of and Directly Preceding a De-Energization Event?

A. Advanced Outreach & Education

SDG&E will continue to build on educating its customers, the public, stakeholders and local jurisdictions about wildfire safety, the potential for PSPS events, resources and services available during PSPS events, and the importance of preparedness. SDG&E's focus of reaching the greatest number of recipients, in the most effective manner, will continue to drive safety-communication efforts. Enhancements include increased community engagement through town hall meetings, Open Houses and Wildfire Safety Fairs, tours of SDG&E's Emergency

Operating Center and Weather Center, sharing information on the SDG&E website, direct communications to customers via direct mail and email. Increases in public relations communications (e.g., radio, television, print advertising and social media campaigns) will also be employed to reach the public. SDG&E will also be partnering with other IOUs, CalOES, representatives from CBOs and advisory councils on a statewide effort to reach and educate AFN and hard-to-reach populations about wildfire safety, Medical Baseline and low-income programs available.

SDG&E will continue to provide information and situational awareness about de-energization in multiple ways. The Public Safety Power Shutoff Policies and Procedures document is being updated for 2020, including SDG&E's decision-making considerations, notification process to customers, the new portal for non-customers to sign up for notifications, communications protocols with key stakeholders and resources.

SDG&E will continue to leverage its 30-minute documentary entitled "Everything in Our Power." The documentary is a comprehensive review of the SDG&E's wildfire preparedness program and includes a discussion of the Public Safety Power Shutoff program. The documentary will air on local TV stations and theaters throughout the service territory throughout the year. Expanded promotion will include mass media channels such as radio, television and print advertising.

The SDG&E website will continue to utilize a dedicated Public Safety Power Shutoff section, to which the public along with public safety partners are driven to as part of our public education campaign. SDG&E also drives the public and Public Safety Partners to this section of the website prior to initiating a Public Safety Power Shutoff event. Event notifications in additional languages will also drive to the dedicated Public Safety Power Shutoff section during adverse-weather events.

Public Safety Power Shutoff collateral materials will be developed and provided to customers via direct mail. It will also be made available to the general public during outreach events such as open houses, wildfire safety fairs, meetings with government agencies, CBOs, public officials, and Public Safety Partners.

SDG&E is working with the other California IOUs and CalOES to implement a statewide effort directed at AFN and low-income communities. Quarterly meetings are expected, and statewide CBOs will also join the quarterly discussions. SDG&E will continue to leverage the company's relationship with the San Diego County AFN Working Group to strategize and implement the best methods of reaching traditionally hard-to-reach communities.

B. Notification Preceding a De-Energization Event

There have been no significant changes since SDG&E's September 2019 Progress Report. As conditions permitted, SDG&E successfully and timely provided PSPS notifications during its 2019 PSPS events, consistent with the Phase 1 De-Energization Guidelines.

VII. What Methods Should the IOUs Use to Communicate a De-Energization Event with the Public?

SDG&E continues to utilize and refine its communication and notification strategy developed in partnership with local and state Public Safety Partners, key stakeholders, as well as solicited feedback from affected customers and communities to improve effectiveness. Several communication platforms are utilized during a Public Safety Power Shutoff event, including the SDG&E website, the SDG&E app, diverse social media platforms, media outreach including local emergency radio and television news outlets, SDG&E’s Enterprise Notification System (i.e., voice, text and email based on customer preference). Additionally, a cross section of community partners help amplify SDG&E’s messages such as 211 San Diego, the American Red Cross, community emergency response teams, the County of San Diego Office of Emergency services just to name a few.

The messaging reaches various stakeholders (e.g., customers, registered non-accountholders, local and state Public Safety Partners, jurisdictions, AFN populations and organizations that serve them, etc.). In addition, notifications are delivered in English, Spanish, Chinese (Mandarin and Cantonese), Tagalog, Vietnamese, Korean and Russian. SDG&E is evaluating data from several sources including the U.S. Census Bureau and San Diego Registrar of Voters for additional prevalent languages in the region. SDG&E also plans to considerably expand in-language communications in 2020.

SDG&E will continue to utilize the protocols developed for communicating with affected customers before, during and after Public Safety Power Shutoff events. These protocols are found in SDG&E’s Public Safety Power Shutoff policies and procedures document which will be posted on the SDG&E website, along with other collateral materials that have been distributed as part of the public education campaign and housed on sdge.com. These materials are also made available to the public and Public Safety Partners.

VIII. How Should the IOUs Communicate and Coordinate with Public Safety Partners Before and During a De-Energization Event?

A. Coordinating with Public Safety Partners

There have been no significant changes since SDG&E’s September 2019 Progress Report.

B. Coordinating with Emergency Operation Centers and Incident Command Systems

There have been no significant changes since SDG&E’s September 2019 Progress Report.

IX. What Information Should be Included in Post-Event Reporting

The information in the template SDG&E has used in past PSPS seasons includes the relevant information. In 2020, SDG&E plans to refine the way the information is presented within its PSPS post-event report to make it more user-friendly for the public.

X. De-Energization of Transmission Lines

There have been no significant changes since SDG&E's September 2019 Progress Report.