

**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)

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
2021 PLAN TO SUPPORT ACCESS AND FUNCTIONAL NEEDS POPULATIONS
DURING PUBLIC SAFETY POWER SHUTOFFS**

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February 1, 2021

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Pursuant to Conclusion of Law 36 and Ordering Paragraph 1 of the California Public Utilities Commission's (Commission) Phase 2 De-Energization Decision (D.) 20-05-051, San Diego Gas & Electric Company (SDG&E) submits its 2021 Access and Functional Needs (AFN) Plan, which describes its efforts to address the AFN and vulnerable population during Public Safety Power Shutoff (PSPS) events. SDG&E's 2021 AFN Plan is attached hereto as Attachment A.

Respectfully submitted,

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ATTACHMENT A

San Diego Gas & Electric Company's
Plan to Support Access and Functional Needs
Populations During Public Safety Power Shutoffs

February 1, 2021



Table of Contents

I.	Introduction	1
II.	Identification of Customers with Access and Functional Needs.....	1
III.	External Feedback and Consultation	2
A.	Customer and Community Based Organization Feedback and Research.....	2
1.	Customer Research and Feedback	2
2.	Community Based Organization Capabilities and Language Online Qualitative Survey ..	3
3.	Communities of Concern CBO Interviews.....	3
4.	Tribal Communities	4
B.	Consultation with Interested Parties and Advisory Councils.....	5
1.	Statewide AFN Advisory Council	5
2.	CPUC Disadvantaged Communities Advisory Group	5
3.	Local Government Advisory Councils and Working Groups	6
IV.	Customer Programs and Available Resources	7
A.	Resources for Vulnerable Populations.....	7
1.	2-1-1 San Diego and 2-1-1 Orange County	7
2.	Jewish Family Services	8
3.	Facilitating Access to Coordinated Transportation San Diego	8
B.	Customer Resiliency Programs	9
1.	Resiliency Grant Program.....	9
2.	Resiliency Assistance Program	9
3.	Resiliency Items Program	10
C.	Community Resource Centers	10
D.	Utility Programs Serving Low-Income and Disadvantaged Communities.....	11
1.	Medical Baseline	11
2.	Income Qualified Programs.....	11

3.	California LifeLine Program	12
4.	CBO Community Resiliency Program.....	12
V.	Customer Preparedness Outreach & Community Engagement	13
A.	Direct-to-Customer Outreach	13
B.	Medical Baseline Marketing and Outreach Campaign	14
C.	Participation in Community Events.....	14
D.	CBO Engagement and Community Partnerships.....	15
E.	Emergency Preparedness Safety Website	16
VI.	In-Event PSPS Customer Communications	17
A.	Event Notifications	17
B.	Website and Mobile App	17
C.	Media	18
D.	Call Center Support.....	19
E.	Customer Assistance AFN EOC Role.....	19

I. Introduction

In accordance with California Public Utilities Commission (Commission or CPUC) Decision (D.) 20-05-051, San Diego Gas & Electric Company (SDG&E or Company) submits this annual plan regarding its planned efforts to address people/communities with access and functional needs (AFN) during de-energization events (AFN Plan).

This AFN Plan is focused on SDG&E's approach for serving AFN and vulnerable customers leading up to and during de-energization events. Specifically, it provides a summary of the research, feedback, and external input that has shaped its AFN population support strategy, the programs that serve these vulnerable customers, the preparedness outreach approaches that are focused on vulnerable populations, and the in-event customer communications, which serve AFN populations.

Consistent with D.20-05-051, SDG&E will report on the progress of implementing this AFN Plan in quarterly updates. It is important to note that the scope of this plan is specific to support during Public Safety Power Shutoff (PSPS) events and does not include all accessibility-related activities by SDG&E.

II. Identification of Customers with Access and Functional Needs

The Commission defines Access and Functional Needs as:

Individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency or who are non-English speaking, older adults, children, people living in institutionalized settings, those who are low income, homeless, transportation disadvantaged, including those who are dependent on public transit, those who are pregnant.¹

SDG&E applies these criteria to its customer databases to proactively identify customers that may have a functional or access need. However, SDG&E also recognizes this list may not encompass all customers with AFN and enables customers to indicate if they consider themselves to have an AFN. In addition, SDG&E continually works to identify and partner with external organizations that have the reach and expertise within AFN communities, to amplify its efforts to communicate available services, disaster preparedness education and emergency messaging to customers who are not yet identified within the SDG&E database(s).

SDG&E has identified approximately 390,000 accounts that may have customers with access or functional needs, of which approximately 185,000 reside in the HFTD, utilizing programs or services in the following categories:

¹ D.19-05-042, Appendix A at A6 – A7.

- Customers enrolled in the following programs: California Alternate Rates for Energy (CARE); Family Electric Rate Assistance (FERA); Medical Baseline (MBL); and Temperature Sensitive;
- Customers who receive their utility bill in an alternate format (e.g., Braille; large font bill);
- Customers who have identified their preferred language as a language other than English;
- Customers who self-identify to receive an in-person visit prior to disconnection for nonpayment or self-identify as having a person with a disability in the household (e.g., disabled hearing impaired; disabled vision impaired; and disability – not defined).

III. External Feedback and Consultation

A. Customer and Community Based Organization Feedback and Research

Customer research is critical to helping SDG&E understand and address the barriers and challenges faced by customers with AFN. In 2021, SDG&E will continue to identify and complete research efforts that improve its understanding in this space. SDG&E will also utilize customer research conducted in the latter part of 2020 to identify opportunities for enhancements.

1. Customer Research and Feedback

In December 2020, SDG&E partnered with a research firm (Hiner & Partners) to conduct a robust qualitative research study to assess the needs of SDG&E’s customers with disabilities, particularly around communications efforts. The objective was to learn more about how current communications are perceived, known challenges, and inform how to better serve these customers and collaborate with organizations who support them. A key theme, which was reinforced by the research results, is the need to involve customers with disabilities in designing solutions and including these customers in research and user testing.

The following are “key insights” from the research:

- Utilizing an American Sign Language interpreter for large meetings;
- Using subtitles for every video;
- Using captions and alternate text for photos and visuals;
- Using the Braille Institute’s hyperlegible font for materials for low vision customers;
- Using fonts of 14 point or larger on direct response communications;
- Using hashtags with capitals (e.g., #LikeThisOne); and
- Have multiple versions of communications available (e.g., audio, large print, braille).

The research also outlined additional areas to consider, including:

- Enhanced training for customer service representatives;
- User testing with screen readers for both web sites and mobile apps;
- Providing accessible maps, graphics and PDFs;
- Faster communications with Community Based Organizations (CBOs) and communicate county-wide, in addition to affected cities during emergency events;
- Address customer food loss and customers facing a financial hardship;
- Communication strategies for customers who do not use digital media; and
- Having caller ID on PSPS calls and specificity when possible.

2. Community Based Organization Capabilities and Language Online Qualitative Survey

In August 2020, SDG&E sent a survey to approximately 1,400 CBOs to gain a better understanding of how CBOs work with their constituents during a PSPS event and what languages they communicate in. Specifically, the survey sought to identify: 1) which constituents CBOs represent; 2) which languages their constituents speak; 3) what types of support are provided by CBOs during PSPS; and 4) how SDG&E can provide support in during future power shutoffs.

Key insights resulting from the responses to this survey include:

- The primary languages spoken by CBOs' constituents are English and Spanish.
- The primary services provided by CBOs include emotional needs, food security, case management/social services, and essential items such as clothing and blankets.
- In the future, SDG&E should consider providing the following enhanced services:
 - Connection of constituents with other resources (e.g., 2-1-1)
 - Additional safety communications (e.g., sign-up of alerts, PSPS apps, informational collateral)
 - Connection of constituents with SDG&E programs and services.

3. Communities of Concern | CBO Interviews

In 2020, SDG&E worked with Clay Consulting on an effort to understand the unmet needs of vulnerable populations such as needs related to the COVID-19 pandemic, climate change and power shutoffs, and the current impacts of SDG&E's programs and services. Contacts from approximately 15 CBOs were interviewed to understand how SDG&E can provide more value to vulnerable populations. The focus areas, identified through interviews collected from the CBOs include:

- Expanded Eligibility – Existing programs were cited as needing expanded eligibility and recertification requirements have resulted in customers dropping off the program;
- COVID-19 Related Relief – Financial stress has been exacerbated by COVID-19 and people feel little flexibility to reduce costs;
- Technology – Increased isolation was reported, and technology is not effective with

- some vulnerable populations with access issues; and
- Climate Change – Expectation is that climate change will result in more power shutoffs and more resources will be needed to help vulnerable communities withstand the increasing impacts.

Using the information gathered from this effort, SDG&E will look for opportunities in these priority areas identified by partner CBOs to better serve these communities.

4. Tribal Communities

There are 18 federally recognized tribes that receive service from SDG&E.² Each of these tribes is a sovereign nation with its own citizens with access and functional needs. SDG&E invites its tribal leaders to learn about PSPS events in advance of wildfire season and educates them on programs, improvements and offerings that could help residents with access and functional needs year-round. SDG&E also works with organizations that support tribes, such as the American Indian Chamber of Commerce, Indian Health Councils, and Southern California Tribal Chairmen’s Association, affiliated organizations and Inter-Tribal Long-Term Recovery Foundation, to provide information and resources that can be used to reach populations with access and functional needs.

For years, SDG&E has had discussions with tribes about challenges they face during a PSPS and has worked to make improvements with increased and more tailored communications, additional generator support, resource support, and wildfire mitigation enhancements. In 2020, SDG&E started discussions with Indian Health Councils with a focus on learning and establishing a quality partnership to better understand the challenges and support needed for the tribal access and functional needs community broadly.

Primary feedback provided to SDG&E relate to concerns with food scarcity and limited internet connectivity that would require providing information in hard copy format. SDG&E incorporated this feedback during the 2020 wildfire season and was able to utilize an existing partnership with Feeding San Diego to support the tribes with an emergency food distribution pantry. In addition, SDG&E provides community flyers with relevant information on each PSPS event to tribal governments and Indian Health Councils for posting within communities.

In 2021, SDG&E will continue meeting and listening with tribal governments and organizations to better understand the tribal access and functional needs community to consider and implement further enhancements in preparation for the next wildfire season.

² Note that there are 16 reservations that are served by SDG&E, but there are many tribal members that live outside of reservations that also receive service from SDG&E. There are also non-federally recognized tribes that receive service from SDG&E.

B. Consultation with Interested Parties and Advisory Councils

SDG&E has a demonstrated history of seeking collaboration with community partners on a wide range of programs and services that help the communities it serves. SDG&E's philanthropic funding guidelines support "programs that help diverse underserved populations, people with disabilities, and low-income families." Additionally, SDG&E frequently coordinates with CBOs and leverages their expertise, advice, and counsel on customer obstacles to access essential information and services provided to customers.

Supporting and seeking expertise from community agencies and constituent groups has allowed for targeted programs and more efficient protocols to support equity of service and support to SDG&E's customers. Collaboration encourages introspection of programs and communications and aim to increase the success of all organizations. The following describes SDG&E's various collaborative partnerships.

1. Statewide AFN Advisory Council

The California Investor Owned Utilities (IOUs) all have a similar mission focused on safely and reliably delivering clean energy to the customers and communities they serve. In 2020, the IOUs worked jointly to establish a statewide external AFN Advisory Council, comprised of a diverse group of recognized community leaders supporting the AFN population, members and advocates from within the AFN community as well as leaders from various State Agencies.

The Council advances the mission of each of the IOUs by providing independent expertise to help ensure that all customers receive services that enhance human dignity and respect for the individual. SDG&E leverages the AFN Advisory Council's knowledge and expertise by seeking advice and comment on current and future AFN communications, programs, and protocols for PSPS events.

2. CPUC Disadvantaged Communities Advisory Group

In response to Senate Bill (SB) 350, the Disadvantaged Communities Advisory Group (DACAG) was established by the Commission and the California Energy Commission (CEC) in December 2017. The 11-member group meets several times a year to review and provide advice regarding proposed clean energy and pollution reduction programs and policies to ensure that disadvantaged communities will benefit from these programs. In addition, the DACAG discusses and advises the Commission and the CEC on broader topics related to disadvantaged communities (DACs).

SDG&E will continue to monitor the DACAG meetings to better understand and plan for the needs of the low-income community.

3. Local Government Advisory Councils and Working Groups

SDG&E participates in numerous local government advisory councils and working groups which include efforts related to populations with access and functional needs.

a. SDG&E Wildfire Safety Community Advisory Council

In 2021, SDG&E will continue to conduct quarterly Wildfire Safety Community Advisory Council (WSCAC) meetings, which are led by SDG&E's Chief Operating Officer and are attended by members of SDG&E's Safety Committee of the Board of Directors. Consistent with D.20-05-051, WSCAC members include leaders/representatives from the following groups in the San Diego region: public safety partners, communications and water service providers, local and tribal government officials, business groups, non-profits, AFN and vulnerable communities, and academic organizations. These meetings are highly regarded as an effective means to present SDG&E's annual Wildfire Mitigation Plan (WMP) and subsequent updates for discussion, suggestions, and recommendations by WSCAC members. SDG&E also welcomes input from WSCAC members on relevant emerging community issues on wildfire safety and preparedness.

b. AFN PSPS Working Group

SDG&E, in collaboration with the San Diego County's Office of Emergency Services (County OES), created a sub-committee to the County's existing AFN Working Group. This sub-committee focuses on Public Safety Power Shutoffs, with the purpose of sharing lessons learned between the impacted communities and SDG&E to help refine its de-energization protocols. Feedback and advice are sought from all stakeholders to improve Community Resource Centers (CRCs), communication strategies, information sharing, identification of critical facilities, strategies for supporting people and communities with AFN. Most importantly, SDG&E looks to this group to provide recommendations for the best ways to conduct outreach to PSPS impacted customers and communities and plan the coordination for future de-energization events. These meetings have served as an effective means to reach customers and receive feedback for enhancements to Public Safety Power Shutoffs protocols and will continue into 2021.

c. Local Support Groups for AFN Customers

In 2021, SDG&E plans to solicit and utilize feedback from local support groups to help inform what additional support services are needed for AFN customers. There is an array of individual and family support groups for physical, medical, and psychological conditions. These types of groups help individuals and their families better understand what individuals are experiencing and provide for the connection to others in like situations for help and facilitate emotional and technical support.

SDG&E will begin an outreach campaign to partner with these support groups to disseminate and communicate important disaster preparedness education and emergency PSPS information. Additionally, SDG&E seeks to better understand and consider which accommodations and best practices will bring dignified access to all its customers.

d. Low Income Oversight Board

In 2001, the Legislature established the Low Income Oversight Board (LIOB) to serve as a liaison for low-income ratepayers and to advise the Commission regarding low-income electric and gas customer issues.³ The 11-member board consists of a governor appointed chair, CPUC Commissioner, Department of Community Services and Development (CSD) representative, private weatherization contractor representative, electric/gas utility representative, water utility representative, and five members with an expertise in the low-income community not affiliated with any state agency or utility group.⁴ SDG&E and the other IOUs provide standing reports regarding its low-income programs and presents on other topics, such as PSPS, when requested by the LIOB.

SDG&E will continue to present at the LIOB meetings and engage in stakeholder presentations to better understand and plan for the needs of the low-income community.

IV. Customer Programs and Available Resources

A. Resources for Vulnerable Populations

In 2020, SDG&E continued to prepare and support the most vulnerable customers throughout its service territory by providing a broad range of programs, services and resources. These efforts are outlined below with a continued focus in 2021 on identifying new opportunities as areas of improvement are identified.

1. 2-1-1 San Diego and 2-1-1 Orange County

Part of the mission of 2-1-1 San Diego and 2-1-1 Orange County is to serve as a nexus to bring community organizations together to help people efficiently access needed education, information and services, and provide vital data and trend information for proactive community planning. In 2020, SDG&E expanded its partnerships with 2-1-1 San Diego and 2-1-1 Orange County to serve as a resource hub for customers with AFN during PSPS events.

The enhanced services available through this partnership for customers with AFN include:

- Enhanced identification of AFN customers through partner lists and phone screening;
- Assessment of AFN population needs and aligning them with existing and new regional services;

³ SB 2 from the Second Extraordinary Session (SBX2 2).

⁴ PU Code Section 382.1(b).

- Referral of customers to resources for assistance with services such as evacuation planning;
- Additional services including hotel stays, assisted transportation, food security, welfare checks and delivery of resiliency items;
- Navigation support (e.g., personalized case management and follow-up for impacted individuals with the greatest need);
- Outreach campaign to customers in advance of and during PSPS events through a broad range of communications channels; and
- Proactive community engagement outside of the fire season to ensure AFN individuals have the resources they need ahead of time.

In 2020, 2-1-1 San Diego and 2-1-1 Orange County assisted approximately 300 PSPS customer customers during PSPS events. This successful support model will continue into 2021 and enhancements will be made as they are identified through various feedback and review mechanisms.

2. Jewish Family Services

Jewish Family Services San Diego (JFS) is one of San Diego’s most impactful non-profit human services agencies providing supportive services for over a hundred years building a stronger, healthier, more resilient San Diego. In 2020, SDG&E contracted with JFS to provide a broad range of PSPS support services to vulnerable populations ensuring customers’ needs could be served during a PSPS event. When a PSPS event occurs, JFS is available to provide services to impacted AFN customers from 7:00 a.m. - 10:00 p.m., 7 days a week. Offering these services with expanded hours ensures customers will have access to services when they are most needed. Customers are referred to JFS on an as needed basis, through the 2-1-1 referral network. Available services include:

- Welfare checks
- Shelf-stable food and ice
- Delivery of resiliency items or kits
- Transportation to a safe location
- Temporary lodging

SDG&E will continue to partner with JFS in 2021 and will make enhancements as needed.

3. Facilitating Access to Coordinated Transportation San Diego

Facilitating Access to Coordinated Transportation (FACT) provides accessible transportation to those in need. In 2020, SDG&E contracted with FACT for enhanced ambulatory (regular) and wheelchair (accessible) transportation for people with AFN before and during PSPS events. This partnership enables extended hours of operation during PSPS events from 5:30 a.m. to 11:00 p.m., 7 days a week. Customer service calls are coordinated through the 2-1-1 referral network. SDG&E will continue this partnership in 2021 and will refine and enhance as needed.

B. Customer Resiliency Programs

1. Resiliency Grant Program

SDG&E's Resiliency Grant Program (formerly known as the Generator Grant Program) was launched in 2019 as a customer resiliency program focused on the needs of customer segments with enhanced vulnerability to PSPS outages. The program offers a Yeti 3000 re-chargeable battery back-up unit, which was delivered to customers' homes. In 2020, this program was offered to all Medical Baseline customers who experienced a PSPS event the prior year (2019).

During the 2020 wildfire season, SDG&E implemented many support services during PSPS events. One scenario of particular concern due to the COVID-19 pandemic was supporting customers with a medical crisis resulting from lack of power that could not be addressed through hotels, transportation, and other services. As a result, SDG&E piloted a small program that enabled the "real-time" dispatch of a battery generator during a PSPS event to customers experiencing a medical emergency that could not be transported. In 2021, SDG&E will explore the continuation and possible expansion of this pilot.

Additionally, for 2021 SDG&E is looking to expand this program to accommodate both the increased number of MBL customers impacted by 2020 PSPS outages, and to include other customers with AFN who may not be currently enrolled in the MBL program, such as those that have self-reported disabilities or vulnerabilities.

2. Resiliency Assistance Program

SDG&E's Resiliency Assistance Program (formerly known as the Generator Assistance Program) was launched in the summer of 2020 to target an expanded segment of customers in High Fire Threat Districts (HFTD) who experienced a 2019 PSPS outage with an offer for an instant online rebate on a portable generator. Through this program, SDG&E has been able to engage, educate, and offer customers new options to enhance their own personal emergency preparedness plans for PSPS events. The Resiliency Assistance Program offers a rebate as an incentive for customers to prepare themselves with backup power sources. The program offered a \$300 rebate to customers who met the basic eligibility criteria of residing in the HFTD and having experienced a recent PSPS-related outage. In addition, the program targeted the low-income segment with an enhanced rebate of \$450 for all CARE customers. This enhanced rebate provides a 70-90% discount on the average portable generator models for lower income customers, and the program success was evident given that CARE customers redeemed the rebate (i.e., purchased a generator) at a 33% higher rate than non-CARE customers eligible for the general market rebate during 2020. The 2021 program will continue to target AFN low-income customers with enhanced rebates on portable generators, well pump backup generators, and portable power stations.

3. Resiliency Items Program

In 2020, SDG&E explored a Resiliency Item Delivery pilot program during PSPS events. The goal of this program is to deliver resiliency items such as water, ice, snacks, blanket, battery power bank (for cell phones) and hand cranked radio flashlight combo to AFN customers impacted by PSPS to alleviate hardships. On days when customers experienced a PSPS event, customers received a call from SDG&E's vendor offering the delivery of resiliency items. Interested customers received requested resiliency items the same day. In 2021, SDG&E plans to continue to test this program and evaluate customer interest.

Additionally, in 2021 SDG&E will continue to collaborate with communities to identify and pilot new support solutions for this population based on customer needs as well as to scale solutions based on the scope and duration of events. Customer and community feedback will play a key role in informing additional support that may be needed by this population.

C. Community Resource Centers

SDG&E has ten customer-owned facilities located within the HFTD that serve as CRCs during adverse weather events and may establish more CRCs should the need arise. Additionally, SDG&E has two mobile CRC units that can be dispatched to anywhere in its service territory to support customers' needs. SDG&E has also identified a preliminary location for a new CRC in the Southern Orange County region and plans are in development. When SDG&E anticipates that power will be off for an extended period, CRCs will be activated and open from 8:00 a.m. through 10:00 p.m. daily, until power to the affected community has been restored.

CRCs offer bottled water, light snacks, cell phone charging, chairs, restrooms, ice, water trucks (for large animals), and up-to-date outage event information. Other volunteer organizations, such as the San Diego County Red Cross, provide bottled water and snacks for temporary relief to residents in the area. Additionally, SDG&E endeavors to provide cellular network services and will collaborate with the telecommunication providers who support services around the CRCs.

In addition to working with CRC facility owners to ensure compliance with the Americans with Disabilities Act (ADA), SDG&E is also in the process of partnering with an AFN expert to conduct assessments of all CRCs to identify enhancements that may benefit the AFN community. SDG&E also utilizes Advisory Councils and Working Groups to identify enhancements to make customers with AFN more comfortable, and a recent example includes the addition of privacy screens. In 2021, SDG&E will continue to incorporate recommendations from AFN experts and partners.

D. Utility Programs Serving Low-Income and Disadvantaged Communities

Through SDG&E's public education and outreach campaigns, it promotes relevant programs and services that are available to AFN customers in advance of PSPS events to support emergency preparedness, cost savings and resiliency. These programs, described below, not only help low-income and disadvantaged communities, but are also a critical way for SDG&E to reach this demographic of the AFN population.

1. Medical Baseline

The Medical Baseline Allowance program provides additional energy at a baseline rate (the lowest rate possible for residential customers) to customers with medical conditions that require heat, air conditioning, or have a qualifying medical device. In order to enroll in the Medical Baseline program, the applicant must have an eligible medical condition verified by a licensed physician along with a completed application form certified by a licensed Medical Doctor (M.D.), Doctor of Osteopathy (D.O.), Nurse Practitioner or Physician Assistant. The equipment is for home-use only and must have a medical purpose to qualify. In response to the COVID-19 customer impacts, changes have been made to ease program enrollment including providing up to 12 months for the enrollee to provide signed medical authorization and suspending recertifications. Customers may apply for the Medical Baseline program via mail, fax, email, or over the phone through SDG&E's Customer Contact Center.

In 2020, SDG&E established an MBL online application located on the SDGE.com website, which allows customers to self-certify during the COVID-19 pandemic. This will continue into 2021. Additionally, pursuant to D.20-06-003 issued on June 16, 2020, SDG&E plans to implement a marketing and outreach plan focused on increasing Medical Baseline program enrollment in 2021 pending Commission approval. Details of SDG&E's marketing and outreach plans for program years 2021-2026 can be found in SDG&E Advice Letter 3589-E / 2890-E, dated August 17, 2020. Further details of this plan are included in Section V.B (Medical Baseline Marketing and Outreach Campaign) below.

2. Income Qualified Programs

The California Alternate Rates for Energy Program (CARE) and Family Electric Rate Assistance Program (FERA) are bill discount programs that help eligible customers pay their energy bills. Over 350,000 customers are receiving bill discounts from SDG&E through these two programs. Eligibility for the CARE and FERA Programs are based on income; participants qualify if they self-certify that they have met income guidelines or if they are enrolled in other qualified public assistance programs.

The Energy Saving Assistance (ESA) program provides no-cost weatherization services to low-income households who meet the same income guidelines as the CARE Program. Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weather stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs which reduce air infiltration.

SDG&E's customer assistance campaigns promote both CARE and ESA to all income qualified populations, including the AFN population. SDG&E's efforts to enroll customers in both programs heavily utilize the Energy Solutions Partner network, which trains CBOs on all relevant SDG&E programs and services. SDG&E expects a Commission decision on its Low Income Program Application for program years 2021-2026 in the first half of this year and will continue all relevant community outreach and enrollment efforts as allowed by the new decision.

In addition to promoting and informing CBOs and customers of the customer assistance programs that SDG&E administers, SDG&E also cross-promotes and coordinates with the Low Income Home Energy Assistance Program (LIHEAP) through the efforts of three Local Service Providers (LSPs) in San Diego and Orange County. SDG&E also cross-promotes the California Lifeline program in order to provide as much relevant information on ways that customers can reduce utility bills overall.

3. California LifeLine Program

The California LifeLine Program is a State program that provides discounted home phone and cell phone services to eligible households. The discounts help consumers lower the cost of their phone bills. SDG&E continues to promote the California LifeLine Program through coordination with its general customer assistance campaign as needed.

4. CBO Community Resiliency Program

SDG&E uses shareholder grant dollars to fund the recently launched County OES Neighborhood Evacuation Teams (NET) which consists of local Community Emergency Response Team (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.

SDG&E works closely with the CERT teams and County OES and as part of this new NET program, SDG&E will continue to form strong relationships so that vulnerable Medical Baseline customers have evacuation plans in place during non-emergency classified PSPS events.

V. Customer Preparedness Outreach & Community Engagement

A. Direct-to-Customer Outreach

Building on its efforts in 2020, SDG&E will execute an enhanced Safety and AFN Public Education campaign in 2021. This is a territory-wide, mass-market communications effort to achieve greater customer awareness and education. The campaign, in combination with direct communications and outreach, will help SDG&E reach its AFN audience most effectively and promote message consistency across the service territory. Planned tactics for this effort include, but are not limited to, community outreach events such as wildfire safety fairs and webinars; direct outreach to vulnerable populations in high-risk areas; emails to customers; bill inserts; wildfire safety newsletters; and wildfire-related outage notifications.

Personal Disaster Plan Brochure

In 2020, SDG&E worked with the County OES to collaboratively produce digital and printed copies of the AFN Personal Disaster Plan Brochure which will serve as a public resource in 2021. SDG&E's contribution to the document included content about utility-related wildfire safety and PSPS awareness and service offerings.

In 2021, brochures will be made available to customers and the public through SDG&E outreach events. The document will also be available to CBOs affiliated with SDG&E's Community Partnerships Program, San Diego County's Relay Network, Indian Health Councils, and the general public. The content that SDG&E provided has been translated into the prevalent languages in SDG&E's service territory (as determined per guidance from the Commission) and will be available to customers and the public both as printed collateral for outreach events and digitally posted on SDG&E's website.

Formal CBO Collaborations

In addition to its coordinated effort with County OES, SDG&E will continue to leverage its formal partnerships through its Community Partnerships Program, with 2-1-1 San Diego, 2-1-1 Orange County, Jewish Family Services and other stakeholders to inform the public about support services available during wildfire-related events (which includes PSPS). Though these services are available to the general public in the SDG&E service territory, this expanded collaboration is designed to help support AFN populations and vulnerable communities. Both 2-1-1 San Diego and 2-1-1 Orange County are umbrella organizations for a consortium of CBOs that serve SDG&E's territory. These CBOs specialize in delivery of services.

The 2-1-1 organizations, along with San Diego County's Partner Relay Network, also amplify messaging during wildfire-related events. SDG&E will continue to provide and update social media kits for organizations to use during wildfire safety events. Additionally, SDG&E will continue to refine communication channels and in-language offerings for these organizations as it receives feedback from CBOs and customers in the form of direct communications and research (focus groups and polling).

B. Medical Baseline Marketing and Outreach Campaign

In order to identify the broadest possible group, SDG&E intends to use a combination of direct marketing and more general marketing to reach a wider audience, including medical professionals and family members who may influence medical care decisions. SDG&E plans to employ both traditional and non-traditional advertising methods such as news sponsorships or station-read announcements, as a broad-based way to reach AFN customers who may qualify.

SDG&E's media strategy plans to use mass market media, such as TV, print and digital, in a way that treats the message in the style of a Public Service Announcement (PSA) versus a traditional ad campaign and combine this broader outreach with more targeted efforts where available, such as high-risk areas incorporating wildfire safety messages for customers on life support equipment.

Potential tactics may include:

- **TV – Broadcast** | 10 second ads eliminate potential production challenges due to COVID-19 and allow for a high frequency campaign during key programming. The News Billboards and Sponsorships may be complemented with longer 1-2 minute interviews and/or vignette segments in a Question and Answer format with a station personality and an SDG&E spokesperson to explain the Medical Baseline Program in more detail.
- **Print** | Target senior publications, hard-to-reach areas such as the back country, and various multi-cultural publications in-language
- **Digital** | Banner ads, paid search, and paid social ads possible for more targeted outreach through various digital channels and social media platforms
- **Collateral** | Develop Medical Baseline printed and electronic collateral that can be distributed through medical offices, CBOs and virtual events

C. Participation in Community Events

Beginning in 2020, due to pandemic concerns, SDG&E created new Wildfire Resiliency Webinars and Drive-thru Safety Fairs. The Safety Fair events enabled SDG&E outreach teams to connect directly with customers and the public and directly provide collateral, safety and resilience materials and even saplings from the Vegetation Management team.

For 2021, these outreach events, held in back-country locations, will start in Spring and continue through Summer in communities that have historically experienced extreme weather conditions. The goal of the wildfire safety fairs is to provide customers and community members an opportunity to interact directly with SDG&E's subject-matter experts regarding important safety and operational information and continued participation with external partners, providing much needed resource information to potentially impacted communities. External partners include CAL FIRE, American Red Cross, 2-1-1 San Diego, San Diego County Animal Services and others.

In 2020, the overall attendance for the four webinars and four drive-thru wildfire safety fairs was very high with over 3,000 community members participating and a 97% “very satisfied” survey rate. In 2021, SDG&E will continue these events and collaborate with CBOs to inform customers about safety measures related to wildfires, community assistance programs and PSPS. In addition to wildfire safety fairs and wildfire resiliency webinars, SDG&E’s outreach team plans to support upcoming food distribution, tribal and senior events where information regarding wildfire mitigation, emergency preparedness and PSPS notifications will be provided.

Direct communications tactics, along with proactive media coverage through TV and radio, will be enlisted to help promote these events through HFTD targeted emails. Collateral materials with wildfire safety information will be provided to participants, including the new AFN Personal Disaster Plan brochure that was produced from a collaboration between County OES and SDG&E.

D. CBO Engagement and Community Partnerships

CBOs are a key channel and support network utilized to promote wildfire preparedness and awareness of PSPS events. This network, comprised of over 400 organizations, serves a critical role in connecting SDG&E with their constituencies and includes the County OES AFN Working Group and Partner Relay Network, which translates communications into dozens of languages. In many cases, these groups are considered trusted partners and experts by the customers they serve, and they are able to provide valuable feedback to SDG&E on the needs of their constituents as well as amplify SDG&E’s wildfire preparedness and notification messaging to hard-to-reach customers.

Nearly 200 of these organizations are members of SDG&E’s Energy Solutions Partner Network. SDG&E works with these organizations year-round to help prepare customers, especially those who may be vulnerable, for wildfires through presentations, events, meetings and amplification of emergency preparedness information. Additionally, when a possible PSPS event is identified, SDG&E provides notifications and updates to these organizations who then serve as a critical channel to amplify that messaging and communicate it to customers who may not utilize traditional channels. Through its Energy Solutions Partner Network, SDG&E is able to reach diverse, multicultural, multilingual, senior, special needs, disadvantaged and access and functional needs communities.

In 2021, SDG&E will continue to partner with CBOs and will be especially focused on strengthening existing partnerships and building new partnerships with organizations that represent the needs of customers with AFN.

E. Emergency Preparedness Safety Website

SDG&E maintains a succinct and publicly accessible website focused specifically on wildfire preparedness and safety. Additionally, SDG&E hosts a general preparedness safety webpage that includes safety information related to natural gas, electricity, vegetation management, generator use, emergency preparedness and power outages. This information is found at sdge.com/safety.

The Company's overarching Wildfire Safety Public Education efforts direct customers and the public to a dedicated and updated wildfire safety webpage (sdge.com/wildfire-safety). Communications tactics and materials that direct to the webpage include, but are not limited to print collateral, broadcast media, newspaper advertising, digital and in-community communications.

The wildfire safety webpage serves as the company's one-stop shop for wildfire preparedness, Public Safety Power Shutoffs, safety information and available resources. Power outage safety and resiliency is emphasized throughout this section of the website. Also included are updated safety tip videos and wildfire safety webinar content. Additionally, the section includes information about the extensive partnerships and systems used to ascertain fire-science data. A fire-science podcast, which highlights the development and use of innovative fire science data that informs wildfire decision-making, is also planned in 2021. A primary call-to-action on the wildfire-safety section of the website and company's public-education campaign materials will continue to encourage customers and the public to sign up for wildfire-related notifications, coupled with wildfire safety and PSPS preparedness, safety and resiliency tips.

A recent technology advancement that will continue to be available to the public in 2021 is the SDG&E PPS mobile app called Alerts by SDG&E. This tool enables customers and the public to sign up for PPS notifications based on address and geo-spatial location. A dedicated public education campaign to promote the app will continue to be leveraged in 2021, and the app will also continue to be promoted on sdge.com. A dedicated landing page (sdge.com/PPSapp) also provides an overview of the app's functionality and the ability for page visitors to download the app directly to their digital device.

Much of the refreshed content is intended to broaden reach to customers and public audiences. The wildfire safety section of sdge.com has the capability to be translated into the prevalent languages that have been identified in the SDG&E service territory. A dedicated landing page will continue to provide resources to assist AFN communities, particularly for PPS events (sdge.com/AFN). The page provides information and links for: PPS notification registration, emergency plan/kit checklists, generator safety, the Medical Baseline program and application, CARE, FERA and ESA.

SDG&E will continue to broaden its partnership with 2-1-1 San Diego, 2-1-1 Orange County, Jewish Family Services and other community partners, including local Tribal Nations for communications support and public-service offerings during wildfire and PSPS events. A dedicated section of the PSPS landing page (sdge.com/wildfire-safety/psps-more-info) includes information about these CBO collaborations and services they provide. A refreshed year-long AFN public education campaign is planned to launch earlier in the year (Q1). Campaign messaging will drive to this new section of the website and refer to the organizations supporting the AFN community.

Additional fire or weather-related webpages are also actively maintained throughout weather-related incidents by SDG&E and are accessible using the following addresses:

- Weather: sdgeweather.com
- Community Resource Centers: sdge.com/resource-centers
- Outage Map: sdge.com/outages

VI. In-Event PSPS Customer Communications

A. Event Notifications

SDG&E initiates outbound dialing campaigns utilizing its Enterprise Notification System (ENS) to notify all impacted customers of PSPS events. For MBL customers, SDG&E reviews the results of each campaign to determine if a positive confirmation for MBL customers was received through a voice contact (landline or cell phone, based on the customer's preferred contact number). For any MBL customers that SDG&E does not reach by voice contact, a list is provided to SDG&E's Customer Contact Center, who proactively call customers that have not been contacted. If they are unsuccessful in contacting the customer, SDG&E will then send a Customer Service Field representative to the customer's service address to notify them.

SDG&E trains Customer Service representatives who may encounter customers with AFN during PSPS door-knock notifications on the County of San Diego's First Responder AFN Training Series to promote an empathetic and supportive approach for customers with AFN

B. Website and Mobile App

SDG&E has a dedicated PSPS website for customers. The website has a new dashboard layout that makes it easier to find information. Additionally, the webpage has an address look-up tool so customers can find out if they are impacted. The page also includes a dynamic list of communities impacted and potential shutoffs, including real-time customer counts and Community Resource Centers.

The page also has customized information for AFN customers, including resources and highlighting the partnership with 2-1-1. Specifically, for AFN customers, the page was built with a responsive design and coding that optimizes the webpage on all devices and built with low-bandwidth and customers with AFN in mind. The page adheres to Web Content Accessibility

Guidelines, or WCAG 2.0, and Section 508, and SDG&E is working towards WCAG 2.1 guidelines. This includes natural information such as text and images, as well as code or markup that defines structure and presentation.

SDG&E also has a dedicated mobile app – available for iPhone and Android – for PSPS. The app is “unauthenticated,” which means users do not need to log in to use the app. This is helpful for customers with AFN, as well as other customers who might not have an account with SDG&E (e.g., renters whose landlord covers utilities).

Users receive up-to-date, real-time status updates with push notifications for saved locations, and use an interactive map. Users also have clear insight into restoration efforts with status tracker and time of restoration estimate.

The app was built with the W3C WAI Mobile Accessibility guidelines. Specific items that were factored in include zoom and magnification, contrast, small screen size, keyboard control for touchscreen devices, touch target size and spacing, and touchscreen gestures.

C. Media

In 2021, different media mediums will continue to be utilized to help reach AFN communities and promote wildfire safety and PSPS awareness. The public education campaign that began last fall, will be in market earlier this year (Q2-Q3) and will include a variety of media channels and messages. Digital and paid social media channels such as Twitter, Facebook, Instagram and Nextdoor will be used to target large audiences as well as niche markets including, but not limited to, older adults, lower income households, in-language communities and people with disabilities. In-studio outreach and virtual interviews with local broadcast media will also be used to help supply important preparedness information and promote community events like SDG&E’s drive-thru wildfire safety fairs and webinars. The Company is also exploring additional video assets about household safety and preparedness that can be used on its YouTube channel, webpage, and other digital platforms.

SDG&E will continue to use broadcast media (radio and TV) and public service announcements (PSAs) as a form of mass market communications. Content will include, but will not be limited to, mitigation measures being implemented to reduce wildfire risk and impacts associated with PSPS; community resources like 2-1-1 San Diego and Orange County; and emergency preparedness. The Company’s wildfire documentary, *Everything in Our Power*, is also being updated to reflect the new efforts and investments SDG&E has made in wildfire safety. The updated documentary will be made to the public through multiple broadcast and digital media platforms.

Prior to a wildfire-related event, the media will be engaged early and often to ensure all our customers are notified of impending conditions. Local broadcast media, including designated emergency broadcast radio, will continue to amplify SDG&E’s messaging during a wildfire or wildfire-related event to keep customers and the public informed. Local broadcast media is

kept apprised of situational awareness prior to the start of an event, informed of conditions during an event and followed up with after an event has concluded. In 2021, SDG&E will continue to make any needed COVID-19 adaptations in its approach with media. Social media will also be heavily used during wildfire season. Information is made available in real time during an event to provide the public with additional channels to receive timely information.

D. Call Center Support

In 2021, SDG&E will continue to support customers with AFN, including during PSPS events. When concerned customers call and speak with an agent, they will be directed to the appropriate resource to receive support (e.g., 2-1-1, Customer Assistance AFN Emergency Operations Center (EOC) role, etc.). Additionally, SDG&E's Customer Contact Center representatives are trained to speak with customers experiencing challenges and if it is the customers' preference, flag them in SDG&E's system as having a self-identified disability for additional consideration of tools, programs and services.

E. Customer Assistance AFN EOC Role

In 2020, SDG&E created and staffed a new seat in its EOC specifically dedicated to supporting customers during PSPS events. This seat collaborates extensively with SDG&E's support partners including 2-1-1, FACT, Jewish Family Services, Salvation Army, and CBOs to provide up-to-date information on PSPS events and addresses the needs of customers reaching out for assistance. SDG&E plans to continue this dedicated EOC seat in 2021 and will continue to refine and enhance support services.