

**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)  
QUARTERLY UPDATE TO 2021 PLAN TO SUPPORT ACCESS AND FUNCTIONAL  
NEEDS POPULATIONS DURING PUBLIC SAFETY POWER SHUTOFFS**

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October 29, 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 and Phase 3 De-Energization D. 21-06-034, San Diego Gas & Electric Company (SDG&E) submits this quarterly update regarding its progress toward meeting its 2021 Access and Functional Needs (AFN) Plan and the impact of its efforts to address the AFN and vulnerable population during Public Safety Power Shutoff (PSPS) events. SDG&E's quarterly update is attached hereto as Attachment A.

Respectfully submitted,

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October 29, 2021

# **Attachment A**

San Diego Gas & Electric Company's  
Quarterly Update to 2021 Plan to Support  
Access and Functional Needs Populations During  
Public Safety Power Shutoffs

October 29, 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. AFN Landing Page.....2
    - 2. PSPS Research Online Survey .....2
    - 3. Tribal Communities.....3
  - B. Consultation with Interested Parties and Advisory Councils..... 3
    - 1. Statewide AFN Advisory Council.....3
    - 2. Local Government Advisory Councils and Working Groups .....5
      - a. AFN Regional PSPS Working Group..... 5
      - b. Low Income Oversight Board (LIOB)..... 5
- IV. Customer Programs and Available Resources ..... 6**
  - A. Resources for Vulnerable Populations ..... 6
    - 1. 2-1-1 San Diego and 2-1-1 Orange County .....6
    - 2. Facilitating Access to Coordinated Transportation San Diego .....6
  - B. Customer Resiliency Programs..... 6
    - 1. Resiliency Grant Program.....6
    - 2. Resiliency Assistance Program .....7
    - 3. Resiliency Pilots.....8
  - C. Community Resource Centers ..... 8
  - D. Utility Programs Serving Low-Income and Disadvantaged Communities..... 8
    - 1. Medical Baseline .....9
    - 2. Income Qualified Programs.....9
    - 3. CBO Community Resiliency Program..... 10
- V. Customer Preparedness Outreach & Community Engagement ..... 10**
  - A. Direct-to-Customer Outreach ..... 10
    - 1. Public Education Campaign..... 10
    - 2. Tribal Communications..... 11
    - 3. Direct Mailers..... 11

4.	Direct Community Partnerships .....	12
5.	Program Promotion.....	13
B.	Medical Baseline Marketing and Outreach Campaign .....	13
C.	Participation in Community Events.....	14
D.	CBO Engagement and Community Partnerships .....	14
E.	Emergency Preparedness Safety Website.....	15
<b>VI.</b>	<b>In-Event PSPS Customer Communications.....</b>	<b>17</b>
A.	Event Notifications.....	17
B.	Website and Mobile App .....	18
C.	Media .....	19
D.	Call Center Support.....	19
E.	Customer Assistance AFN Emergency Operations Center Role.....	19

**Appendix A - 2022 AFN Planning Group Invitees and Participants**

## I. Introduction

On February 1, 2021, San Diego Gas & Electric Company (SDG&E or Company) submitted its 2021 plan regarding its planned efforts to address people and communities with access and functional needs (AFN) during de-energization events (2021 AFN Plan) in accordance with California Public Utilities Commission (Commission or CPUC) Decision (D.) 20-05-051. SDG&E's 2021 AFN Plan outlined its approach for serving AFN and vulnerable customers leading up to and during de-energization events.

Per D.20-05-051, SDG&E provides this quarterly update regarding its progress toward meeting its 2021 AFN Plan and the impact of its efforts to address the AFN and vulnerable population during de-energization events, also known as Public Safety Power Shutoff (PSPS) events. This update maps to and follows the sequencing of SDG&E's 2021 AFN Plan<sup>1</sup> for ease of reference and builds upon the efforts described therein. Specifically, rather than repeat the activities SDG&E describes in its 2021 AFN Plan that were already taken, this update provides the incremental efforts taken since July 30, 2021.

## II. Identification of Customers with Access and Functional Needs

In addition to the approximately 400,000, or 30%, of residential customers already identified as AFN, SDG&E has been expanding efforts to identify additional customers with AFN. Now that SDG&E has created a new "AFN field," SDG&E began promoting this option in a mailer survey during July 2021 and reached out to approximately 15,000 customers to update their contact information and provide them with an opportunity to "self-identify." SDG&E plans to continue to promote this option on an on-going basis. SDG&E has also launched its new dedicated AFN landing page ([sdge.com/afn](https://www.sdge.com/afn)) and included the link to self-identify in addition to promoting at outreach events and through CBO outreach channels. Additionally, SDG&E launched a Personalized Preparedness Resources online survey to approximately 150,000 customers, and this includes the ability to self-identify as AFN.

SDG&E has collaborated with the Statewide AFN Council to develop a common statewide preliminary definition of AFN for purposes of identifying pertinent individuals that may be affected by power outages so SDG&E may better target outreach efforts.

Additionally, the investor-owned utilities (IOUs) and members of the Joint IOU Statewide AFN Council have collaborated to better understand the benchmarked universe of designated electricity-dependent individuals in our respective service areas. As suggested by select AFN stakeholders, the IOUs have benchmarked with 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. These organizations have provided the IOUs data

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<sup>1</sup> SDG&E's 2021 AFN Plan (Feb. 1, 2021) is available here: [https://www.sdge.com/sites/default/files/R.18-12-005%20SDGE%202021%20AFN%20Plan%20%201%2021\\_0\\_1.pdf](https://www.sdge.com/sites/default/files/R.18-12-005%20SDGE%202021%20AFN%20Plan%20%201%2021_0_1.pdf)

through aggregated ZIP code counts for a total of approximately 215,000 electricity-dependent clients in the IOU service territories.

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) to help mitigate the impacts of PSPS. SDG&E will continue to leverage customer data to identify the specific power dependency needs of the AFN customer segments as defined by the CPUC, identify electronic technologies that provide critical support for AFN customers, and identify targeted communications and outreach plans.

### **III. External Feedback and Consultation**

#### **A. Customer and Community Based Organization Feedback and Research**

##### **1. AFN Landing Page**

SDG&E has continued to utilize surveys to gather and incorporate feedback into processes and solutions. One example this quarter, is the development of the new dedicated AFN landing page at [sdge.com/afn](https://sdge.com/afn). Before developing the page, SDG&E invited CBO partners to take a short online survey to share their suggestions upfront on the content of the page. More than 30 survey responses were received from CBOs who support a variety of AFN areas. Their feedback was instrumental in the development of the initial page. After completion of the page, SDG&E enlisted research firm Hiner & Partners to conduct usability testing for customers with disabilities to get their impressions of the page in terms of accessibility, usefulness, and clarity of information. Overall, users liked the “one stop shop” idea of the AFN landing page and felt the content was relevant to their household. SDG&E found the testing helpful in identifying improvements for users including images, links, color contrast, and formatting. This feedback has subsequently been incorporated.

##### **2. PSPS Research Online Survey**

SDG&E annually conducts a pre and post PSPS Wildfire Mitigation survey to understand customers’ awareness and understanding of wildfire safety communications among residents and businesses. The survey is available to take in all prevalent languages in SDG&E’s service territory. The pre PSPS wave, conducted in September, measures awareness of safety-related communications, sources of information, awareness of PSPS and emergency preparedness. These surveys included questions that will allow SDG&E to isolate responses of customers who identify as having access and functional needs. SDG&E will analyze those responses, as well as compare to those of non-AFN households, to better understand their unique level of awareness, understanding and preparedness. This will help shape processes and procedures related to PSPS, and through the AFN 2022 AFN Plan will establish key metrics to be measured in the post PSPS season wave.



### **3. Tribal Communities**

In response to tribal community feedback regarding ways SDG&E could help in advance of wildfire season, SDG&E reserved 40 back-up batteries for tribal community members with access and functional needs. SDG&E has streamlined the process enabling the Indian Health Councils to direct back-up batteries to tribal community members in need. Twelve batteries have been delivered to the Southern Indian Health Council (SIHC). Additionally, SDG&E partnered with the La Jolla Band of Luiseno Indians to host a Wildfire Resiliency Fair to help prepare the surrounding communities in advance of wildfire season.

In addition to individual meetings with tribal governments throughout the year, this year SDG&E briefed Southern California Tribal Chairmen's Association on enhancements to support tribal communities during PSPS events. SDG&E reached out to all tribes with information on and an offer for training on its new Safety Partner portal and to provide Medical Baseline (MBL) information to tribal governments. In August 2021, SDG&E also added an additional dedicated tribal support to its Tribal Relations team - a Tribal Relations Manager. This role is focused on supporting tribes year-round with wildfire resiliency and PSPS.

#### **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 supports "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.

By supporting and seeking expertise from community agencies and constituent groups, SDG&E has been able to design 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 section describes SDG&E's various collaborative partnerships.

##### **1. Statewide AFN Advisory Council**

In 2020, the IOUs worked jointly to establish a Statewide AFN Advisory Council (AFN Advisory Council) comprised of a diverse group of recognized community leaders supporting the AFN population, advocates and members of the AFN community, and leaders from various state agencies.

The AFN Advisory Council has been a key resource for knowledge and benchmarking with the other IOUs, helping SDG&E to build an AFN support program and supporting the Company's commitment to continuous improvement. SDG&E, along with the other IOUs, has been collaborating with the AFN Statewide Council and our FEMA expert to develop the 2022 AFN Plan according to FEMA's 6 steps.

SDG&E utilizes feedback from the Council to refine our processes and solutions to mitigate impacts of PSPS to customers with AFN. Some actions prompted in Q3 through collaboration of the AFN Advisory Council and are now in place include:

- Launched new Statewide 211 support model providing consistent and timely support for all customers with AFN;
- Developed a common statewide preliminary definition of AFN for purposes of identifying pertinent individuals that may be affected by power outages to better target outreach efforts;  
*“Individuals with disabilities and/or access and functional needs who require power for devices/equipment for health, safety, and independence”*
- Partnered with social service agencies to send a joint Medical Baseline email in 10 languages, which was distributed to the Advisory Council organizations to share broadly with their constituents;
- Developed and shared comprehensive IOU summary of all available AFN resources by utility; and
- Conducted joint IOU trainings to increase awareness of resources with social service agencies, medical partners, and tribal governments reaching more than 800 participants.

In collaboration with the AFN Statewide Council, SDG&E has begun development of its 2022 AFN Plan in accordance with the FEMA Comprehensive Preparedness Guide as adopted by the Phase 3 revised guidelines for PSPS. The IOUs have collaborated to align our approach, and to enlist a FEMA expert to assist with the development of the structure. On September 2, 2021, the IOU executive team met with the stakeholders identified in this decision to initiate the collaborative planning team discussions and propose a schedule. In order to ensure comprehensive representation across various AFN perspectives, on September 24, the IOUs introduced this effort to the broader Joint IOU Statewide AFN Council meeting & invited additional organizations such as DeafLink, Hospital Council, American Red Cross and CA Rural Indian Health Board, to solicit participation in the planning committee. A full list of invited and confirmed organizations has been included as Appendix A.

## **2. 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. Specific information and updates on these advisory councils and working groups are provided below.

SDG&E Wildfire Safety Community Advisory Council SDG&E held its quarterly Wildfire Safety Community Advisory Council (WSCAC) meeting on August 18. SDG&E presented on SDG&E's enhanced support for all customers during PSPS events, especially those with access and functional need, and the company's innovative methods to reduce undergrounding costs. Chief Tony Mecham provided an update from CAL Fire on the 2021 fire season outlook. The final meeting of the year is scheduled for November 19, 2021.

SDG&E will continue to conduct quarterly Wildfire Safety Community Advisory Council (WSCAC) meetings in 2022. WSCAC meetings are led by SDG&E's Chief Executive Officer and are attended by members of SDG&E's Safety Committee of the Board of Directors. 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.

### **a. AFN Regional PSPS Working Group**

SDG&E has continued to hold quarterly PSPS AFN Working Groups, with the last meeting occurring August 18, 2021. SDG&E shared information related to support services for customers with AFN, notifications and accessibility, Community Resource Plan and Wildfire Mitigations and Grid Hardening. The San Diego County Office of Emergency Services coordinator discussed the Personal Disaster Plan for People That May Need Assistance Public Service Announcements (PSA) campaign that will kick-off the first two weeks of September in partnership with the San Diego County Libraries. SDG&E did not receive recommendations for enhancements to PSPS protocols. The next PPSWG meeting is scheduled for December 9, 2021.

### **b. Low Income Oversight Board (LIOB)**

The LIOB held the third quarterly meeting of 2021 on September 29. In preparation for the meeting, SDG&E provided the LIOB with information regarding customer support and available services during PSPS events, including the 2-1-1 referral service, AFN support model, and information on several battery back-up programs.

SDG&E did not receive any feedback during this meeting related to PSPS as the meeting primarily focused on the marketing and outreach efforts related to COVID-19 for the California Alternate Rates for Energy (CARE) Program and the Energy Savings Assistance (ESA) Program activities beginning in third quarter 2021. 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**

SDG&E has continued to expand on its robust AFN support program which enhances the resiliency and mitigates impacts for our most vulnerable customers.

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

SDG&E has extended its partnership with 2-1-1 SD and 2-1-1 Orange County into 2021 and has continued to expand and enhance as gaps and new opportunities are identified. In addition to enhanced identification of AFN customers, assessment of AFN population needs, hotel stays, assisted transportation, food security and delivery of resiliency items, in Q3 SDG&E has also added the following partnerships:

- Engaged a second catering partner to provide warm food to impacted areas as needed during PSPS events;
- Partnered with the San Diego Food Bank and Feeding America to hold food distributions in communities impacted by PSPS and offer gift cards to qualifying families; and
- Partnered with San Diego County Fire Community Emergency Response Team (CERT) and San Diego County Sheriff's Department You Are Not Alone (YANA) programs for wellness checks based on community and stakeholder feedback.

In Q3, SDG&E also partnered with California's Department of Social Services In-Home Health and Supportive Services (IHSS) Program Managers and the Department of Developmental Services' Regional Center staff reaching more than 500 participants to promote these mitigations and drive broader awareness with social services agencies.

#### **2. Facilitating Access to Coordinated Transportation San Diego**

SDG&E has renewed its contract with for a second year, going into 2022. Facilitating Access to Coordinated Transportation (FACT) provides accessible transportation to those in need. SDG&E will continue to partner with FACT in 2021 and is currently evaluating ways to broaden awareness of accessible transportation services to AFN customers impacted during a PSPS event, as well as streamlining the referral process. SDG&E's partnership with FACT includes enhanced ambulatory (regular) and wheelchair (accessible) transportation for people with AFN before and during PSPS events. This partnership provides extended hours of operation during PSPS events from 5:30 a.m. to 11 p.m. daily. Customer service calls are coordinated through the 2-1-1 referral network.

### **B. Customer Resiliency Programs**

#### **1. Resiliency Grant Program**

SDG&E's Resiliency Grant Program offers a Yeti 3000X rechargeable battery back-up unit, which

is delivered to customer homes. In 2021, SDG&E expanded this program to accommodate the increased number of MBL customers impacted by 2020 PSPS events and includes customers who have self-identified as having a disability and reside in the High Fire Threat District (HFTD).

In the third quarter of 2021, SDG&E continued sending invitations to eligible customer accounts with a goal to deliver battery back-up units to approximately 2,000 additional customers by December 31, 2021 for a total of approximately 3,700. SDG&E has delivered more than 1,900 units, representing approximately 96% of targeted customers having received back-up power solutions before any 2021 PSPS events. SDG&E and the contracted partners will continue scheduling appointments and delivering units in Q4 to meet or exceed the 2021 goal.

SDG&E has also focused support for tribal communities and worked closely with the Indian Health Councils to create a new streamlined process to coordinate delivery of the battery back-up units to vulnerable customers. SDG&E also reserved 40 units specifically for tribal communities.

Additionally, in 2021, SDG&E expanded the pilot Emergency Generator Grant Program launched in 2020 that enables “real-time” dispatch of a battery generator during a PSPS event to customers experiencing a medical emergency that cannot be transported. Approximately 40 battery back-up units are available for this program and will be delivered within 1 to 4 hours upon request during a PSPS event.

## **2. Resiliency Assistance Program**

SDG&E’s Resiliency Assistance Program offers a rebate incentive for customers to prepare with back-up power sources. The Resiliency Assistance Program offers a \$300 rebate to customers who meet 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 is equivalent to a 70–90% discount on the average portable generator models for lower-income customers. The 2021 program continues to target customers in the HFTD who have experienced previous PSPS events, including enhanced rebates for low-income AFN customers on portable generators and portable power stations. Invitations to participate in this program were sent to customers in the second quarter of 2021 with a participation goal of 1,250 customers in 2021.

In the third quarter of 2021, customers began to participate in the program with nearly 1,100 customers downloading the rebate coupon as of September 30. Of those, more than 250 customers have redeemed coupons on verified purchases. SDG&E will continue to promote these rebates heavily to customers in the HFTD with the goal of increasing for potential PSPS events. The program is also focused on raising awareness and participation among tribal nations.

### **3. Resiliency Pilots**

In late September 2021, SDG&E invited more than 150,000 customers to participate in the new Personalized Preparedness Resources online survey (located at [sdge.com/prepared](https://sdge.com/prepared)) to support residential customers in preparing for PSPS and other power outage events. SDG&E is continuing to research additional ways to promote this survey to our vulnerable customers flagged and self-identified as AFN in SDG&E's customer information system.

With the results of the survey, SDG&E will be able to identify additional customers with AFN as well as gain insights into their needs. Lastly, SDG&E is regularly monitoring customers' responses to aid them in receiving requested assistance, which will also help SDG&E plan for future customer offerings.

#### **C. Community Resource Centers**

In Q3, SDG&E provided additional resources and supplies to Community Resource Centers (CRCs) for the safety and wellbeing of people with access and functional needs. This includes privacy screens, communication aides and "AFN Go Kits." The AFN Go Kits contain accessibility signage, supplemental detectable barrier surface mats, additional accessible parking signs and aisle barriers, as well as textured high contrast path of travel safety and hazard warning messaging. Communication aids include several Visual Language Translator boards for basic communications. When a more complex conversation is needed, Community Resource Center staff now have access to a Video Remote Interpreters (VRI) service on a laptop, smart phone or tablet. The VRI service provides video chat interpreters for ASL and audio interpreters in over 200 spoken languages.

Additionally, individuals have direct access to community partner AFN resources through SDG&E's partnerships with 2-1-1 San Diego and 2-1-1 Orange County (collectively "2-1-1") supporting community members affected by PSPS. SDG&E provides self-service options on our Community Resource Center website which enables a customer to not only search for open CRCs but directs customers to view our PSPS website to visualize where power has not been turned off. Power can be accessed via any community not identified within the scope of the current PSPS event boundaries. Additionally, customers in need will be referred to no-cost hotel stays via 2-1-1.

SDG&E has recently rolled out updated ADA Accessibility and Disability Integration training to CRC staff, and each CRC staff member is provided the Access and Inclusion Tip Sheet adapted from Cal OES tip sheet for vaccination centers.

#### **D. Utility Programs Serving Low-Income and Disadvantaged Communities**

SDG&E promotes relevant programs and services through public education and outreach campaigns 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 MBL program provides an additional allotment of energy each month at the lowest price to residential customers with special energy needs due to qualifying medical conditions.

Pursuant to D.20-06-003, SDG&E has implemented a marketing and outreach plan focused on increasing MBL program enrollment. Details of SDG&E's marketing and outreach plans for program years 2021–2023 can be found in SDG&E Advice Letter 3589-E/2890-G, dated August 17, 2020.<sup>2</sup> Further details of this plan are included in Section V.B (Medical Baseline Marketing and Outreach Campaign) below.

### **2. Income Qualified Programs**

The CARE and Family Electric Rate Assistance (FERA) programs are bill discount programs to help income-eligible customers pay their energy bills. As of September 2021, more than 350,000 SDG&E customers receive energy bill discounts through these two programs. CARE and FERA program participants self-certify they have met certain income guideline criteria. CARE eligibility criteria also allow for enrollment of customers who already participate in certain 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. The ESA program offers low-income natural gas and electric customers weatherization services, energy efficient lighting, energy efficient appliances, energy education, and other services.

Additional payment assistance programs available to support those customers in need, include the Arrearage Management Payment (AMP) Plan and the state Emergency Rental Assistance Program (ERAP).

The AMP is a 12-month payment plan that forgives 1/12 of an eligible participant's arrearage after each on-time payment of the current month bill. After 12 on-time payments, the participant's arrearage will be fully forgiven, up to a maximum of \$8,000. Additionally, enrolled participants are protected from disconnection for non-payment.

The ERAP provides additional support for renters who have experienced financial hardship as a result of COVID-19 and meet certain income guidelines. This program provides rent and utility bill assistance to customers residing within San Diego County, the City of San Diego, and Chula Vista.

SDG&E's ongoing customer assistance campaigns promote CARE, ESA, AMP, and ERAP to income-qualified customers, including AFN populations. SDG&E's efforts to enroll customers in

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<sup>2</sup> Advice Letter approved by Commission Resolution E-5169 issued September 24, 2021.

these programs utilizes the Energy Solutions Partner Network, which consists of about 200 CBOs, who provide customers with all relevant SDG&E programs and services. Throughout Q3, SDG&E's Outreach Team and the Partner Network heavily focused on amplifying messaging around payment assistance programs, particularly AMP and ERAP, through events, presentations, and social media posts. SDG&E also partnered with the San Diego and Imperial Counties Labor Council and the San Diego Housing Commission to cohost several ERAP enrollment events throughout the community and SDG&E employees directly assisted customers throughout the entire enrollment process. SDG&E has strategically identified and engaged CBOs to promote these programs to the AFN population.

In addition to promoting and informing CBOs and customers of the assistance and bill payment programs available, 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 County 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. CBO Community Resiliency Program**

SDG&E renewed shareholder grant funding for the Salvation Army, San Diego Housing Federation, and California Foundation of Independent Living Centers (CFIL)C) focusing on supporting vulnerable customers and building resiliency for the customers in the San Diego community.

Additionally, SDG&E renewed shareholder grant funding in 2021 for the County OES Neighborhood Evacuation Teams (NET), which consists of local CERT members. CERT members assist their vulnerable neighbors with completing a Disaster Preparedness Plan specifically created for people who may need assistance and their caregivers. In 2021, these efforts will focus on evacuation planning and identification of several points of contact for assistance during an emergency.

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

## **V. Customer Preparedness Outreach & Community Engagement**

### **A. Direct-to-Customer Outreach**

#### **1. Public Education Campaign**

During the third quarter of 2021, SDG&E continued the AFN Wildfire Safety paid public education campaign. Additionally, direct and customized communications to AFN customers were initiated with specific offers and complementary wildfire safety and PSPS messaging for



AFN communities. This public education was expanded from the high fire threat areas to the entire service territory. The mass market tactics include:

- Streaming radio in English and Spanish;
- Print advertising in Hispanic, Asian and African-American publications, as well local/in-community publications supporting rural areas of elevated wildfire threat;
- Digital (display banners) in English and Spanish; and
- Paid Social Media in English and Spanish.

The paid campaign will run through the fourth quarter of the year.

## 2. Tribal Communications

SDG&E has secured contracts with two tribal consultants. These tribal resources have started review of messaging and materials with the intent to customize them for tribal audiences. Additional work scope will include creation of a cultural toolkit with tribal history summaries, cultural resource information, and an archive of culturally sensitive imagery. They will also help facilitate tribal community engagement to review new materials and provide feedback. This effort will help to identify gaps and create more appropriate, relevant and culturally appropriate content and materials for tribal communities. This will be a multi-year effort. Additionally, these consultants were engaged in quarter two to provide tribal messaging in SDG&E's 2021 Wildfire Advancements video that will be released in July.

In September, SDG&E worked with one of the tribal consultants to provide content for a newscast for the Southern California Tribal News (part of the Southern California Tribal Chairmen's Association). The information provided includes, but is not limited to, PSPS, the SDG&E PSPS app (SDG&E Alerts), and wildfire resiliency.

Additionally, SDG&E's Outreach and Tribal Relations teams have launched an effort to share and present on Customer Assistance, MBL, and additional program information to tribal councils to further determine eligibility and provide enrollment support. To date, SDG&E has met with 7 of the 17 Federally recognized tribes.

## 3. Direct Mailers

SDG&E is utilizing several direct mail campaigns to prepare customers in the HFTD, and especially those with AFN, for wildfire season. Some of these direct mail campaigns include:

**AFN Self-Identification Campaign Mailer:** In July 2021, SDG&E began a self-identification campaign mailer survey promoting the opportunity for customers that were currently identified as "disability undefined" to self-identify as access and functional needs and dependent on uninterrupted power. The survey mailer reached out to approximately 15,000 customers, and encouraged them to update their contact information and provide them with an opportunity to "self-identify" and had a 50% response rate.

**Multifamily Unit Campaign:** In Q3, SDG&E implemented a three-pronged approach to educate and inform HFTD multifamily property managers, owners and tenants of back-up generation, resiliency support, emergency preparation, and notification services through 1) direct mail campaign to property managers; 2) email campaign to tenants; and 3) collaboration with key community-based organizations that serve these constituents

In mid-October SDG&E sent a direct mailer to ~2,700 property managers of multi-family homes in the HFTD that includes information for their preparedness as well as printed flyers to display promoting available back-up generation, resiliency programs, preparedness and notification information.

Additionally, a direct email campaign will reach ~15,000 multi-family tenants in the HFTD to update preferred contact information, share information about resiliency support, back-up generation and links to notification options. The AFN/PSPS flyers and the new dedicated AFN landing page include information about emergency kit preparedness, SDG&E Alerts App for notifications, Community Resource Centers, backup power generation, customer assistance programs and PSPS support services. The emails followed the property manager communications that were distributed.

**Direct Mail Campaign to MBL customers:** SDG&E sent letters to ~12,500 MBL customers in the HFTD in late July. The letter was intended to educate them further about Public Safety Power Shutoffs as well as encourage updating their contact information and signing up for notifications.

**Mobile Home Park Direct Mail Campaign:** SDG&E sent PSPS safety information packets to Mobile Home Park Managers to distribute to ~23,000 Mobile Home Park residents. These information packets include information on wildfire preparedness, PSPS notifications and AFN support services available before and during a PSPS. The information also included referral to SDG&E's AFN landing page ([sdge.com/AFN](http://sdge.com/AFN)) as an ongoing resource for access to additional services and 2-1-1 support.

**HFTD Newsletter:** SDG&E sends an annual HFTD Newsletter to all residential customers residing within the HFTD. The mailer includes resiliency and preparedness information for threat of wildfire and PSPS. Additionally, MBL information is also included in the newsletter, along with AFN information pertaining to solutions available through SDG&E's partnership with 2-1-1. SDG&E's new residential Wildfire Resiliency Survey is also promoted in the collateral piece. The survey provides tips and recommendations for customers based on their residence location.

#### 4. Direct Community Partnerships

In addition to its coordinated efforts with County OES, SDG&E will continue to leverage formal partnerships through its Energy Solutions Partner Network, as well as those with 2-1-1 San

Diego, 2-1-1 Orange County, and others to inform the public about support services available during wildfire-related events, which include PSPS. Though these services are available to the general public in the SDG&E service territory, this expanded collaboration is specifically designed to help support AFN populations and vulnerable communities.

The 2-1-1 organizations, along with San Diego County's Partner Relay Network will continue to amplify messaging during wildfire-related events in 2021. SDG&E provides social media kits and talking points for these organizations to use during events. Additionally, SDG&E has been meeting directly with ~40 partners who serve constituents in the HFTD to provide specific PSPS training, webinars and PSPS kits to ensure these CBOs are prepared to support communication and notification efforts before, during and after PSPS events.

## **5. Program Promotion**

In addition to information specifically related to wildfire and PSPS preparedness and support, SDG&E utilizes opportunities to cross-promote programs and solutions to customers with AFN. AFN specific messaging has been added to PSPS notifications, social media and sdge.com/afn to inform customers of offerings and services available to them. In particular, the efforts summarized above will promote the availability of the MBL program.

During Q2 and Q3 SDG&E continued to stage Wildfire Safety Fairs for HFTD communities. These events also highlighted the collaboration with other community-based organizations and agencies that support wildfire resiliency efforts. SDG&E also worked with the County of San Diego to provide content for their "County of San Diego Office of Emergency Services, Personal Disaster Plan" brochure. The document is about 50 pages, and SDG&E covered printing costs for Wildfire Safety Fair attendees this year.

### **B. Medical Baseline Marketing and Outreach Campaign**

In July, SDG&E launched a campaign promoting the MBL program throughout the service territory. Mass-market advertising was used for this effort and included digital advertising and paid social media. Messaging associated with this campaign is intended to bring new program participation and will encourage new customer sign-ups for MBL. The campaign will run through the end of November. Targeted direct communications will be utilized to promote the program for new enrollments as well as encourage current participants to update contact information and sign-up for PSPS notifications.

Additionally, the California IOUs executed joint marketing campaigns with the Department of Developmental Services (DDS) and the Department of Social Services (DSS), Department of Rehabilitation (DOR), Council for the Blind, and hospital council / hospital associations (e.g. Hospital Association of Southern California, etc.) to more broadly communicate MBL.

SDG&E is also preparing to launch an additional MBL outreach campaign in Q4.

**C. Participation in Community Events**

In August 2021, SDG&E hosted two additional drive-thru Wildfire Safety Fairs under strict Public Health Safety Guidelines. SDG&E continues to utilize safety fairs to cross-promote relevant programs, including MBL and provide resiliency items to fair attendees.

In addition to wildfire safety fairs and wildfire resiliency webinars, SDG&E's outreach team has attended food distributions, tribal and senior events where information regarding wildfire mitigation, emergency preparedness and PSPS notifications will be provided.

**D. CBO Engagement and Community Partnerships**

CBOs are a key channel and support network utilized to promote wildfire preparedness and awareness of PSPS events. In addition to broader community partnerships, SDG&E works with and compensates a network of approximately 200 CBOs, known as its Energy Solutions Partner Network, to connect customers with programs, solutions and tools, including Customer Assistance, PSPS and wildfire preparedness. These organizations represent the diversity within SDG&E's service territory and the majority are small, grassroots agencies serving customers with access and functional needs, including those that are multicultural, multilingual, low income, senior, and limited-English proficiency (LEP) audiences in communities of concern. SDG&E works with these organizations year-round to help prepare and educate 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 to this Partner Network, which serves as a critical channel to amplify messaging and communicate it to customers who may not utilize traditional channels.

Since the start of the year, SDG&E has continually focused on enhancing its engagement efforts with CBOs, by strengthening existing partnerships and building new partnerships with organizations that represent the needs of customers with AFN. This enhanced focus has led to nine additional partners including: Alzheimer's Association, Episcopal Community Services, Lived Experiences, Mitchel Thorp Foundation, Noah Homes, San Diego Hunger Coalition, Sherman Heights Community Center, Southwestern College Foundation and Young Black & 'N Business. SDG&E will continue to leverage these new and existing partnerships to amplify PSPS messaging and notifications by providing more robust tools and processes for partners to reference, including a PSPS Partner Prep Kit.

During Q3, SDG&E launched an enhanced PSPS engagement effort with a targeted list of ~40 CBOs within its Energy Solutions Partner Network. These partners were strategically selected due to their location and/or reach serving customers with AFN within the HTFD. As part of this enhanced effort, the CBOs received additional compensation as well as training and materials on what to expect during a PSPS and will provide notification support before, during and after a PSPS.

SDG&E is also collaborating with multifamily community-based organizations, including the Community Housing Works and the San Diego Housing Federation to share PSPS resiliency and support services information with property managers in order to reach customers who reside in buildings that may have elevators. These efforts include social media platforms, newsletters, collateral distribution, and participation in receiving and amplifying daily notification updates during a PSPS activation.

### **Paratransit Service Engagement**

SDG&E has partnered with Facilitating Access to Coordinated Transportation (FACT), a key paratransit agency in SDG&E's region, to develop a communication protocol during PSPS events for the paratransit service providers in the SDG&E service territory. SDG&E will provide updates on PSPS activation including impacted zip codes leading up to, and during a PSPS to FACT, who will amplify this information to more than 160 Para-Transit service providers network. Educational information on PSPS, emergency notifications, Community Resource Centers and 211 support services were provided to these agencies in preparation for wildfire season. On August 10, 2021, SDG&E provided 17 members of the Council on Access and Mobility (CAM) an advisory group to FACT, a presentation on preparing for PSPS, SDG&E's HFTD and AFN support services available.

### **Healthcare Providers**

SDG&E conducted statewide quarterly training sessions to California's Department of Social Services In-Home Health and Supportive Services (IHSS) Program Managers and the Department of Developmental Services' Regional Center staff on available PSPS support programs, back-up generation and services, reaching more than 500 participants. Additionally, the IOUs executed joint marketing campaigns with the Department of Developmental Services (DDS) and the Department of Social Services (DSS), Department of Rehabilitation (DOR), Council for the Blind, and hospital associations (e.g. Hospital Association of Southern California, etc.) to more broadly communicate IOU programs and services that mitigate the impacts of PSPS to these agency clients.

SDG&E also has established partnerships with the Indian Health Council (IHC) and Southern Indian Health Council (SIHC) to understand the needs of their communities, provide requested support (e.g. resiliency items) and distribute generators to vulnerable customers identified by IHC and SIHC.

## **E. Emergency Preparedness Safety Website**

### **AFN Landing Page**

During the second quarter of 2021, SDG&E launched a new dedicated AFN page ([sdge.com/AFN](https://sdge.com/AFN)), bringing available resources together in one place, including safety and education information about wildfire preparedness and PSPS solutions. The page promotes

customer programs that can be useful to AFN populations including Financial Bill Assistance, Health & Medical Assistance and Communication Support Assistance. The landing page is also offered in the prevalent languages spoken in SDG&E's service territory.

The AFN page also offers resources that customers can review and download including the San Diego County Office of Emergency Services AFN Personal Disaster Plan brochure, emergency kit and plan checklists and includes resources for large-print billing. Customers are also encouraged to update their contact information and sign up for PSPS notifications. The general public and customers are encouraged to download the PSPS app with corresponding links on the landing page. This page is also promoted in direct communications to customers including the HFTD Newsletter, bill insert and a special mailing to mobile home parks in the region.

In Q3, SDG&E added the ability to self-identify as AFN to the landing page.

SDG&E is also in the process of translating a 2-page PSPS fact sheet that was developed for AFN audiences, which will be featured on the landing page. The translations will include the 21 prevalent languages spoken in SDG&E's service territory, and the translated documents will be added to the AFN landing page for reference and download.

### **Wildfire and PSPS Webpage**

SDG&E maintains dedicated and updated webpages focused specifically on wildfire and PSPS safety, preparedness, response and resiliency.

SDG&E's overarching Wildfire Safety and PSPS Public Education campaigns direct both customers and the public to dedicated webpages at [SDGE.com/wildfire-safety](http://SDGE.com/wildfire-safety) and [SDGE.com/psps](http://SDGE.com/psps). Communication tactics and materials directing to the webpages include, but are not limited to, print collateral, tv and radio paid advertising, broadcast news media, newspaper and in-community publication advertising, diverse digital, in-community communications, and varied emergency preparedness educational resources.

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 wildfire and PSPS mitigation advancements videos, safety tip and preparedness videos, wildfire safety webinar content, and collateral materials that are produced for print, such as brochures, facts sheets, newsletters, etc. Additionally, the section includes information about the extensive partnerships and innovative technologies used to for enhanced situational awareness. A primary call-to-action on the wildfire-safety and PSPS section of the website, and company's public-education campaign continues to encourage customers and the public to sign up for wildfire/PSPS notifications, coupled with wildfire/PSPS safety, preparedness and response, and resiliency tips.

In Q3, updates were made to the wildfire-safety section of the website, including but not limited to, simplified language, additional videos on SDG&E wildfire safety advancements and

additional links to the new AFN page ([sdge.com/AFN](https://sdge.com/AFN)). The wildfire safety section also offers translated content in the prevalent languages spoken in the region.

SDG&E provides self-service options on our Community Resource Center website which enables a customer to not only search for open CRCs but directs customers to view our PSPS website to visualize where power has not been turned off. Power can be accessed via any community not identified within the scope of the current PSPS event boundaries.

### **Alert App**

SDG&E continues its dedicated PSPS mobile app “Alerts by SDG&E” into the 2021 wildfire season and is focused on further enhancing the customer experience and data quality. SDG&E analyzed the notification and customer data from the 2020 events and has made a number of enhancements to support timely updates throughout the PSPS journey. Enhancements include syncing and distilling U.S. Postal Service and Google addresses with our Customer Information System (CIS), and other mapping and address data cleansing. Further, review and modifications for low-bandwidth customer experiences were completed, as well.

This tool enables customers and non-account holders to sign-up for PSPS notifications for up to 5 addresses, which is important for renters, mobile home park customers and caretakers who can monitor the status for a loved one.

SDG&E continued to promote this app in Q3 through our Wildfire Safety and PSPS public education campaigns, as well as continuing to promote on SDGE.com. A dedicated landing page at [SDGE.com/PSPSapp](https://SDGE.com/PSPSapp) provides an overview of the app’s functionality and the ability for page visitors to download the app directly to their digital device.

## **VI. In-Event PSPS Customer Communications**

### **A. Event Notifications**

SDG&E recognizes the importance of timely communication, particularly to customers who may have access or functional needs. SDG&E continues to notify all impacted customers of PSPS events as soon as possible and will continue to provide door knocks for customers with MBL who are not reached. Beginning in 2021, SDG&E will send accessible notifications to every customer to ensure those with an AFN, as well as non-customers that may have an AFN, can effectively access these notifications.

SDG&E has worked with a third-party sensory accessibility expert (DeafLink), to convert all PSPS and other emergency customer notifications into videos of an ASL Interpreter signing the message with English audio, closed captioned and transcripts of the message available in 21 prevalent languages within SDG&E’s service territory.

Additionally, SDG&E uses grass-roots channels such as printed flyers at key community sites, mobile road signs, and community marquis at schools and other locations to reach customers

who may not have cellular or internet access. Over 200 community-based organizations supplement customer outreach and notifications by providing this information to their constituents.

The AFN Unit in the Emergency Operations Center has process and protocols to communicate vital information leading up to and during a PSPS. We have developed notification templates to communicate with organizations who may actively serve AFN clients during a PSPS, and organizations who inform and support AFN clients during a PSPS. These notifications include the general trend of the PSPS, weather forecast, communities at particular risk, planned and active de-energization, open Community Resource Centers, available resources for those impacted households and other important safety information.

## **B. Website and Mobile App**

SDG&E has a dedicated PSPS website for customers. This site includes an address look-up tool to enable customers to see if they are impacted. The page also includes a dynamic list of communities impacted and potential shutoffs, including real-time customer counts and CRC locations.

The page also has customized information for customers with an access or functional need, including resources, and details highlighting the Company's 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 was 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 of the Rehabilitation Act (29 U.S.C. § 794d), and SDG&E is working towards WCAG 2.1 AA guidelines. This includes natural information, such as text and images, as well as code or markup that defines structure and presentation.

In Q3, SDG&E completed user testing for customers with sight impairments and screen readers and have implemented a number of enhancements including the expanded use of Alt Tags, more strategic use of images and also action-oriented calls to action and links.

SDG&E also has a dedicated PSPS mobile app available for iPhone and Android. 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**

SDG&E continues to foster and grow its strong partnerships with TV and radio broadcast media outlets, both in English and Spanish. SDG&E leverages these partnerships before and during PSPS to increase community awareness. During a wildfire and/or PSPS, local broadcast media (TV, radio and print) amplify customer notifications and play a key role in communicating updates on situational awareness. Local media meteorologists also use the SDG&E weather cameras to provide additional high fire weather condition updates throughout the duration of the wildfire and/or PSPS.

**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 Emergency Operations Center Role**

In 2020, SDG&E created and staffed a new position in its Emergency Operations Center (EOC) specifically dedicated to supporting customers during PSPS events. This EOC position collaborates extensively with internal and external SDG&E customer support programs and support partners. SDG&E works with CBOs to provide up-to-date information leading up to and during a PSPS and to address the needs of customers reaching out for assistance.

SDG&E recognizes the importance of timely communication, particular to customers who may have access or functional needs. The AFN Unit in the Emergency Operations Center has developed and implemented process and protocols to ensure continuity and effectively support to customers during PSPS. We have developed notification templates to communicate with community-based organizations who may actively serve, or who inform and support AFN clients during a PSPS. These notifications include the general trend of the PSPS, weather forecast, communities at particular risk, planned and active de-energization mitigation efforts, open Community Resource Centers, available resources for those impacted households and other important safety information. Partner distribution lists and notification tracking documents are maintained to ensure the most accurate contact information and reporting.

In October, training sessions were held with the entire roster of AFN Unit EOC responders that culminated in a tabletop exercise.

## **Appendix A**

### **2022 AFN Planning Group Invitees and Participants**

First	Last	Organization	Title	Invited	Confirmed Planning Committee
Kelly	Brown	211	Director, Interface 2-1-1	X	X
Tracey	Singh	American Red Cross	Pacific Division Disability Integration Advisor	X	X
James	Collins	CA Council of the Blind	Community Educator	X	X
Nicole	Pacheco	California Council of the Blind	Operations Manager	X	
Michelle	Davis	California Department of Aging (CDA)	Program Manager	X	
Rebecca	Hinkson	California Department of Aging (CDA)	Staff Services Analyst	X	
Rapone	Anderson	California Department of Development Services (DDS)	Manager Office of Community Operations	X	
Ally	Bartz	California Department of Development Services (DDS)	Disaster Response Unit Manager for Community Care Licensing Division	X	
Aaron	Christian	California Department of Development Services (DDS)	Manager, Office of Community Operations- Southern Region	X	
Mayra	Ochoa	California Department of Development Services (DDS)	Office Assistant II Bilingual at Tehama County Department of Social Services	X	
Tamara	Rodriguez	California Department of Development Services (DDS)	Officer, Emergency Preparedness & Response	X	X
Rose	Samaniego	California Department of Development Services (DDS)	Community Program Specialist III-FHA Supervisor	X	
Seneca	St. James	California Department of Development Services (DDS)	Community Program Specialist III	X	X
Leinani	Walter	California Department of Development Services (DDS)	Assistant Deputy Director for Service Access and Equity	X	
JR	Antablian	California Department of Social Services (DSS)	Chief Disaster Services Branch	X	
John	Barnett	California Department of Social Services (DSS)	Manager, Response and Redirect Unit	X	
Joanne	Brandani	California Department of Social Services (DSS)	Deputy Chief, Disaster Services Branch	X	X
Greg	Oliva	California Department of Social Services (DSS)	Assistant Deputy Director, Central Operations, Community Care Licensing Division	X	
Debbi	Thomson	California Department of Social Services Adult Prog Div (DSS)	Deputy Director	X	
Rick	Yrigoyen	California Department of Social Services Adult Prog Div. (DSS)	Customer Relations & Stakeholder Communications Manager	X	
Bonny	Wolf	California Department of Social Services Disaster Unit (DSS)	Disaster Unit	X	
Lisa	Austin	California Foundation for Independent Living Centers (CFLIC)	Disability Disaster Director	X	
Christina	Mills	California Foundation for Independent Living Centers (CFLIC)	Executive Director	X	
Dan	Okenfuss	California Foundation for Independent Living Centers (CFLIC)	Public Policy Manager	X	
Sydney	Pickern	California Foundation for Independent Living Centers (CFLIC)	Disability Disaster Manager, Disability Disaster Access and Resources (DDAR)	X	
Elizabeth	Basnett	California Health & Human Services	Assistant Secretary	X	
Vance	Taylor	California Office of Emergency Services (CalOES)	Chief, Office of Access and Functional Needs	X	
Anne	Kim	California Public Utility Commission (CPUC)	Public Utilities Regulatory Sr. Analyst	X	
Stratton	King	California Rural Indian Health Board	Operations Manager	X	
Mark	Lebeau	California Rural Indian Health Board	Chief Executive Officer	X	
Melissa	Kasnitz	Center for Accessible Technology (CforAT)	Legal Council	X	
Annette	Rogers	Central Valley Regional Center (CVRC)	Fresno NVRC Representative	X	X
Paula	Villescaz	County Welfare Directors Association of CA (CWDA)	Director of Legislative Advocacy	X	
Kay	Chiodo	Deaf Link	Chief Executive Officer	X	X
Ana	Acton	Department of Rehabilitation (DOR)	Deputy Director, Independent Living and Community Access Division	X	
Joe	Xavier	Department of Rehabilitation (DOR)	Director	X	
Carolyn	Nava	Disability Action Center (DAC) Chico   Redding	Northern ILC Representative	X	
June	Isaacson Kailes	Disability Policy Consultant	Disability Policy Consultant	X	X
Lauren	Giardina	Disability Rights California (DRC)	Executive Director Managing Attorney	X	
Andy	Imparato	Disability Rights California (DRC)	Executive Director	X	
Samuel	Jain	Disability Rights California (DRC)	Staff Attorney II, Legal Advocacy Unit	X	
Susan	Henderson	Disability Rights Education & Defense Fund	Executive Director	X	
Alina	Alvarez	East Los Angeles Regional Center	HR Manager	X	
T	Abraham	Hospital Council	Regional Vice President	X	
Joseph	Grounds	Kern Regional Center (KERNRC)	Emergency Response Coordinator	X	X
Karey	Morris	Kern Regional Center (KERNRC)	HR Manager	X	
Gabby	Eshrati	North Los Angeles County Regional Center (NLACRC)	Consumer Services Director	X	
Edwin	Gamino	San Gabriel Pomona Regional Center (SGPRC)	LMS Administrator	X	
Dara	Mikesell	San Gabriel Pomona Regional Center (SGPRC)	Associate Director of Community Services	X	
Larry	Grable	Service Center for Independent Living (SCIL)	Executive Director	X	
Aaron	Carruthers	State Council on Developmental Disabilities (SCDD)	Executive Director	X	
Brian	Weisel	State Council on Developmental Disabilities (SCDD)	Legal Council	X	
Teresa	Anderson	The Arc of California	Public Policy Director	X	