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June 1, 2020

ADVICE LETTER 3548-E
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: INFORMATION-ONLY SUBMITTAL: SAN DIEGO GAS & ELECTRIC
COMPANY'S ACCESS AND FUNCTIONAL NEEDS (AFN) PLAN IN
COMPLIANCE WITH DECISION 20-05-051**

San Diego Gas & Electric Company (SDG&E) hereby submits to the California Public Utilities Commission (Commission) an information-only plan regarding its efforts to address people/communities with access and functional needs during de-energization events (AFN Plan) in compliance with Decision (D.) 20-05-051.

BACKGROUND

On December 13, 2018, the Commission instituted Rulemaking (R.) 18-12-005 to thoroughly examine its rules related to allowing the electric utilities to de-energize (i.e., turn off power) of power lines in dangerous conditions to protect public safety.¹ The proceeding was initially divided into two phases. Phase 1 considered changes to notification and communication requirements related to de-energization events prior to the 2019 wildfire season. It concluded in May 2019 with the issuance of D.19-05-042, which outlined the Commission's overarching de-energization strategy and adopted specific de-energization notification and communication guidelines for the electric utilities to implement, where possible, prior to the 2019 wildfire season.

The Commission initiated Phase 2 of R.18-12-005 in August 2019 with the goal of developing more comprehensive de-energization guidelines, building upon those that were adopted in Phase 1. In light of the extensive de-energization events and wildfires that occurred throughout California in late 2019, the Commission amended the scope and schedule for Phase 2 in December 2019 to focus its efforts on issues that were most critical. In advance of the 2020 wildfire season,

¹ This proceeding would build upon the Commission's past de-energization policies outlined in D.12-04-024 and Resolution ESRB-8. D.12-04-024 established requirements for reasonableness, notification, mitigation and reporting by SDG&E for its de-energization events. Resolution ESRB-8 extended the requirements for SDG&E outlined in D.12-04-024 to all electric utilities and further strengthened the reporting and public outreach, notification and mitigation guidelines adopted in 2012. De-energization is also referred to as Public Safety Power Shutoff (PSPS).

Phase 2 focused on consideration of new guidelines for issues such as: electric utility server and website capabilities; transportation infrastructure dependent on backup generation; Community Resource Centers; PSPS planning exercises; communication and notification when communication services may be disrupted; and assistance for vulnerable populations. Phase 2 concluded with the issuance of D.20-05-051.

DISCUSSION

In May 2020, the CPUC adopted D.20-05-051, which enhanced or added measures to ensure the electric utilities take the necessary steps to address and minimize the duration and impact of PSPS to communities and vulnerable populations. Among the various requirements, the electric utilities must submit a plan to the Commission regarding its planned efforts to address people/communities with access and functional needs during de-energization events. The initial plan is due by June 1, 2020 and every January 31 thereafter. The electric utilities must also provide the CPUC with quarterly updates regarding the progress towards meeting the established plans and the impact of its efforts to address this population during PSPS events.

Specifically, Conclusion of Law 35 of D.20-05-051 states:

The electric IOUs should work in collaboration with public safety partners, local governments, and representatives of people/communities with access and functional needs to identify assistance (including evacuation plans) required by current and potentially eligible medical baseline customers during de-energization events. The electric IOUs should provide a plan to the Commission by June 1, 2020 and thereafter by January 31 of each following year regarding its planned efforts to address people/communities with access and functional needs during de-energization events. The electric IOUs should provide the Commission with quarterly updates regarding the progress towards meeting the established plans and impact of the efforts to address this population during de-energization events.²

Attachment A provides SDG&E's Plan to Support Access and Functional Needs Populations During Public Safety Power Shutoffs.

EFFECTIVE DATE

SDG&E believes this Information-Only submittal is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to General Order (GO) 96-B. SDG&E respectfully requests that this Advice Letter be effective on June 1, 2020, the date submitted.

PROTEST

In accordance with GO 96-B Section 6.2, this information-only submittal is not subject to protest.

² This requirement is also set forth in D.20-05-051, Appendix A – Adopted Phase 2 Guidelines in Addition to Appendix A of Decision 19-05-042 and Resolution ESRB-8. Ordering Paragraph 1 of D.20-05-051 requires the electric utilities to follow the guidelines set forth in Appendix A to that decision.

NOTICE

A copy of this Advice Letter is being sent to SDG&E's GO 96-B service list, the Commission's service list in R.18-12-005, and the Wildfire Safety Division, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by email to SDGETariffs@sdge.com.

/s/ Clay Faber _____
CLAY FABER
Director – Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City: State:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City: State:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

<u>Public Utilities Commission</u> <u>Office of Ratepayer Advocates (ORA)</u> R. Pocta <u>Energy Division</u> M. Ghadessi M. Salinas L. Tan R. Ciupagea Tariff Unit	<u>Clean Energy Renewable Fuels, LLC</u> P. DeVille <u>Clean Power Research</u> T. Schmid G. Novotny <u>Davis Wright Tremaine LLP</u> J. Pau <u>Douglass & Liddell</u> D. Douglass D. Liddell <u>Ellison Schneider Harris & Donlan LLP</u> E. Janssen C. Kappel <u>Energy Policy Initiatives Center (USD)</u> S. Anders <u>Energy Regulatory Solutions Consultants</u> L. Medina <u>Energy Strategies, Inc.</u> K. Campbell <u>EQ Research</u> General <u>Goodin, MacBride, Squeri, & Day LLP</u> B. Cragg J. Squeri <u>Green Charge</u> K. Lucas <u>Hanna and Morton LLP</u> N. Pedersen <u>JBS Energy</u> J. Nahigian <u>Keyes & Fox, LLP</u> B. Elder <u>Manatt, Phelps & Phillips LLP</u> D. Huard R. Keen <u>McKenna, Long & Aldridge LLP</u> J. Leslie <u>Morrison & Foerster LLP</u> P. Hanschen <u>MRW & Associates LLC</u> General	<u>NLine Energy</u> M. Swindle <u>NRG Energy</u> D. Fellman <u>Pacific Gas & Electric Co.</u> M. Lawson M. Huffman Tariff Unit <u>RTO Advisors</u> S. Mara <u>SCD Energy Solutions</u> P. Muller <u>Shute, Mihaly & Weinberger LLP</u> O. Armi <u>Solar Turbines</u> C. Frank <u>SPURR</u> M. Rochman <u>Southern California Edison Co.</u> K. Gansecki <u>TerraVerde Renewable Partners LLC</u> F. Lee <u>TURN</u> M. Hawiger <u>UCAN</u> D. Kelly <u>US Dept. of the Navy</u> K. Davoodi <u>US General Services Administration</u> D. Bogni <u>Valley Center Municipal Water Distr</u> G. Broomell <u>Western Manufactured Housing Communities Association</u> S. Dey <u>Interested Parties in:</u> R.18-12-005 <u>CPUC</u> Wildfire Safety Division
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SDG&E Advice Letter 3548-E
June 1, 2020

Attachment A

San Diego Gas & Electric Company

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

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

June 1, 2020



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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 initial plan regarding its planned efforts to address people/communities with access and functional needs (AFN) during de-energization events (AFN Plan).¹

The Commission has defined AFN populations 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, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant.²

SDG&E has previously described its approach for supporting and communicating with customers in its 2020-2022 Wildfire Mitigation Plan (WMP), which applies to all vulnerable populations within its territory. This plan, however, is focused on SDG&E's approach for serving AFN and vulnerable customers leading up to and during de-energization events.³ 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.

In addition, SDG&E recognizes that the AFN population includes customers with limited English proficiency. SDG&E outlines its plan to support customers with limited English proficiency in its Wildfire Community Outreach Workplan and Budget Compliance Report, which includes the translated communications channels recently filed on May 15, 2020.⁴ SDG&E intends to report on the progress of its translation strategy in its quarterly AFN Plan progress updates. Finally, SDG&E reiterates the scope of this AFN plan is specific to PSPS support and does not include all accessibility-related activities by the utility.

¹ D.20-05-051, Appendix A at 7 (Phase 2 De-Energization Guidelines). "Each electric investor-owned utility shall provide a plan to the Commission by June 1, 2020 and thereafter by January 31 of each following year regarding its planned efforts to address people/communities with access and functional needs during de-energization events. The electric investor-owned utilities shall provide the Commission with quarterly updates regarding the progress towards meeting the established plans and the impact of its efforts to address this population during de-energization events."

² D.19-05-042, Appendix A at A6 – A7.

³ De-energization is also referred to as Public Safety Power Shutoff (PSPS).

⁴ R.18-10-007, SDG&E's Wildfire Community Outreach Workplan and Budget Compliance Report (May 15, 2020).

II. External Feedback and Consultation

A. Customer and Community Based Organization Feedback and Research

SDG&E understands the importance of research and feedback from customers impacted by PSPS events, and from community-based organizations (CBOs) who work with the AFN population. The Company solicits feedback annually from customers affected by PSPS events. This information is used to conduct a gap analysis and further refine future wildfire safety communications strategies and offerings to customers and the general public.

In addition to customer research, SDG&E is developing a survey to CBOs in its service territory to determine the available resources to help support the AFN population, and the demographics of the AFN population they work with, as well as prevalent languages they engage in with their clients, in addition to the languages identified as part of SDG&E's Wildfire Community Outreach Workplan and Budget Compliance Report. Any action items identified as part of the survey results will be incorporated into SDG&E's AFN Plan moving forward.

B. Consultation with Interested Parties and Advisory Councils

1. Statewide AFN Advisory Council

SDG&E partnered with Southern California Edison Company (SCE) and Pacific Gas and Electric Company (PG&E) (together with SDG&E, the investor owned utilities (IOUs)) to form a Statewide AFN Advisory Council in response to a meeting the IOUs held in 2019 with several statewide CBO leaders and the California Office of Emergency Services (CalOES). At that meeting, the IOUs and CBOs initiated a conversation around collaborative efforts to reach the AFN population during PSPS events. Lessons learned from that meeting were used during the 2019 PSPS events including partnering with CBOs to amplify SDG&E's de-energization notifications to residents that may not be the SDG&E accountholder of record and for whom SDG&E did not have the contact information for.

Following the 2019 PSPS events, the IOUs recognized the need to continue the collaboration with statewide CBO leaders to establish a feedback loop where the IOUs can learn and understand the unique needs of its most vulnerable customers and stakeholders. Through the Statewide AFN Advisory Council, the IOUs seek engagement with a diverse group of recognized CBO leaders supporting the AFN population as well as members and advocates from within the AFN community as well as leaders from various State Agencies.

The Statewide AFN Advisory Council advances the IOUs' mission to deliver safe, reliable and clean energy to the customers and communities served. The council member's independent expertise helps ensure the IOUs' customer programs incorporate best practices to improve current and future service. The Statewide AFN Advisory Council will be facilitated by a third-party and plans to meet on a quarterly basis. The first meeting is scheduled to be held in mid-June 2020.⁵

⁵ Due to COVID-19 pandemic, these quarterly meetings will be held virtually to ensure participant safety.

2. CPUC Disadvantaged Communities Advisory Group

In response to Senate Bill (SB) 350,⁶ 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 CEC and CPUC clean energy programs and policies to ensure that disadvantaged communities, including tribal and rural communities, benefit from proposed clean energy and pollution reduction programs. In addition, the DACAG discusses and advises the Commission and the CEC on broader topics (other than clean energy related to disadvantaged communities (DACs)). As members of DACAG, SDG&E will include any lessons learned from this group into its AFN Plan.

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 AFN populations.

a. SDG&E Community Advisory Council (CAC)

In 1998, SDG&E established its Community Advisory Council (CAC) comprised of 20 members to receive input, feedback, and support on various issues, including wildfire matters. The CAC provides for a direct and candid exchange of ideas and perspectives among SDG&E's senior leadership and a diverse cross-section of community leaders representing academic, business, labor, faith-based, non-profit, environmental, law enforcement, local government, and other civic interests in the San Diego region. The CAC meets quarterly to provide recommendations on a broad spectrum of SDG&E and state regulatory issues, such as clean transportation, customer programs, rates, natural gas pipeline safety, infrastructure projects, and wildfire safety.

b. SDG&E Wildfire Safety Community Advisory Council

In 2019, SDG&E formed its Wildfire Safety Community Advisory Council (WSCAC) comprised of a specialized group of diverse and independent community leaders from public safety, tribal government, business, nonprofit, and academic organizations in the San Diego region. The members of the WSCAC possess extensive experience in public safety, wildfire management, community-based services, and applied technology. The WSCAC provides constructive input, feedback, suggestions, and support to SDG&E senior management and the Safety Committee of SDG&E's Board of Directors on how SDG&E can continue to help protect the region from wildfires. The WSCAC meets at least twice a year.

c. County of San Diego Office of Emergency Services AFN Working Group

Locally, SDG&E is a member of the County of San Diego Office of Emergency Services (County OES) AFN Working Group, which is comprised of over 40 members including local CBOs and cities. The purpose of the AFN Working Group is to ensure emergency planning efforts in San Diego County reflect the unique needs of our whole community. This group works to identify the needs of individuals with disabilities and other access and functional needs before, during and after disaster strikes and takes steps to ensure that needs and resources are integrated into emergency management systems.

⁶ SB 350 (Stats. 2015, Ch. 547), the Clean Energy and Pollution Reduction Act of 2015.

SDG&E worked closely with County OES and the AFN Working Group in advance of the 2019 PSPS events to help amplify SDG&E's de-energization notification messaging to residents that these organizations work with. For 2020, SDG&E has been working closely with County OES to help the AFN population prepare for all emergencies. As part of this close collaboration, SDG&E and County OES agreed that having two separate AFN Working Groups in the same territory would be a draw on all organizations' resources that work with the AFN population. As such, SDG&E has asked County OES if SDG&E can chair a sub-group to the AFN Working Group that will be exclusive to utility related issues. SDG&E plans to utilize this sub-group input to continue to inform its strategy for the AFN population.

d. California Office of Emergency Services Office of Tribal Affairs

SDG&E also participates in CalOES' Office of Tribal Affairs statewide calls that address PSPS impacts to tribal communities, tribal coordination and support resources, including support for the tribal AFN population. These calls are led by CalOES, Office of Tribal Affairs, and occur regularly during PSPS events and at less regular intervals in preparation for wildfire season. Participants include California tribal leaders, the IOUs, and other state and federal support agencies.

III. Customer Programs and Available Resources

A. Resources for Vulnerable Populations

SDG&E's inter-departmental collaboration provides AFN customers a broad range of programs and resources. With a commitment for continuous improvement serving this community, SDG&E has identified opportunities to expand on partnerships, new programs and the enhancement of existing programs for those in need.

1. 2-1-1 Referral Service, AFN Support Model

The mission of 2-1-1 San Diego is to serve as a nexus to bring the community (organizations) together to help people efficiently access appropriate services and provide vital data and trend information for proactive community planning. 2-1-1 San Diego and SDG&E have an existing partnership to provide vulnerable populations information and referrals to SDG&E programs and services including the California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), Medical Baseline (MBL) and Energy Savings Assistance (ESA) programs.

Aimed to mitigate adverse impacts to those experiencing PSPS events, SDG&E created a cross-functional team comprised of customer-facing organizations to identify programs and solutions to assist those affected by PSPS. In addition to new "in-house" programs, SDG&E is working on enhanced partnerships with 2-1-1 organizations (San Diego and Orange County) within its service territory. These incremental partnerships will create an expanded offering of services, programs and collateral available to AFN and vulnerable populations. Exact partnership specifics are currently being negotiated, but SDG&E hopes to introduce certain case management assistance to the perceived most vulnerable, including proactive outreach before and after wildfire season. Additional AFN support programs administered through 2-1-1 organizations will be outlined in future AFN Plan reporting updates.

2. Inter-Tribal Agency Assistance

In addition to 2-1-1 organizations, SDG&E is also working with inter-tribal agencies and partners to identify best practices and services the Tribal Nations need to address Medical Baseline and AFN populations within their communities. SDG&E also continues to work closely with the County OES AFN Working Group and Partner Relay Network to reach those in the AFN population. SDG&E is hopeful an expanded partnership with these organizations will produce utility-funded assistance to those in need and will update the Commission on its implementation in its subsequent AFN Plan quarterly report.

3. Generator Grant Program

In 2019, SDG&E created a Generator Grant Program (GGP) in response to feedback received from residential customers who had been impacted by PSPS events. Certain customers lacked the financial capability to acquire a generator. The GGP was launched as a pilot program in 2019 as a first attempt at reaching these impacted communities on a limited basis. The program is administered by a neutral third-party to grant medical baseline residential customers the funding to acquire and use a portable renewable generator during outages, in particular PSPS events.

SDG&E understands that, despite the safety benefits, there are inconveniences associated with de-energization, and this program is one way to provide tools to help mitigate the impact while enhancing customer resilience. Nevertheless, SDG&E strongly encourages all customers to take important steps to prepare themselves before the wildfire season, such as creating an emergency kit and thorough a family emergency plan.

The GGP will help a subset of SDG&E's AFN customers charge cell phones and other small electronic devices while they enact their personal emergency plans. The program also demonstrates that SDG&E is considering solutions and testing renewable, portable generator options, to aid customers' resiliency during PSPS events.

SDG&E received positive customer feedback from its pilot GGP and as explained in its 2020 WMP, plans to transition to a full-scale Generator Grant Program that would offer these portable generator units to an expanded customer base. The first GGP specifically targets medical baseline customers, and as described above will be expanding to meet the needs of more medical baseline customers. The 2020 Expanded GGP will provide the opportunity for all medical baseline customers who were impacted by a PSPS event in 2019 to acquire a portable generator to help mitigate the impacts of PSPS events. The 2020 Expanded GGP plans to provide approximately 1,265 generators in program year 2020.

4. Generator Assistance Program

In 2020, SDG&E plans to initiate a new program called the Generator Assistance Program (GAP),⁷ which will target SDG&E customers who reside in Tiers 2 and 3 of the high fire threat district (HFTD) who experienced two or more PSPS events in 2019. Although the program is open to the customers outlined above at a standard rebate amount to be finalized by Q3 2020, a subset of these customers who are enrolled in the CARE program are eligible for a significant point-of-sale rebate, exceeding the standard rebate amount, on a portable generator commonly found at participating major retailers and online. Half of the program will be funded from rates

⁷ This program was referred to in SDG&E's 2020 WMP as the expanded generator grant program.

and half funded through shareholders. SDG&E anticipates reaching approximately 1,000 customers with this program in order to assist customers with access to additional resilience measures beyond those available in other programs already established. This program is still in the design phase and is subject to revision pending technical feasibility and budgetary constraints.

B. Community Resource Centers

As a result of community meetings held in communities in SDG&E's service area, SDG&E established a network of Community Resource Centers (CRCs) to help communities in real-time during adverse weather events. Currently, SDG&E has identified eight customer-owned facilities located within the HFTD to serve as CRCs during adverse weather events. SDG&E may establish more CRCs should the need arise. If SDG&E anticipates that power will be off for an extended period, SDG&E may open CRCs in affected areas. The CRC locations selected by SDG&E were identified through a rigorous process, which included input from fire and meteorological experts, as well as consideration of those areas most prone to adverse weather, as indicated by historical data.

The CRCs, if activated for a PSPS event that lasts longer than 24 hours, will be powered using a portable backup generator connected through a manual transfer switch. Once activated, the CRC's will operate from 8:00 a.m. through 10:00 p.m. daily, until power to the affected community has been restored. Per D.20-05-051, actual hours of operation will be determined by the local government in cases in which early closure of a facility is required due to inability to access a facility until 10:00 p.m. SDG&E's subject matter experts collaborate with volunteer staff at an activated CRC to provide, to the extent possible, updates and real-time information directly to the impacted community. Other volunteer organizations, such as the San Diego County Red Cross, provide bottled water and snacks for temporary relief to residents in the area. SDG&E will work with the CRC facility owners to ensure that each CRC is Americans with Disabilities Act (ADA)-compliant. The CRCs will also have charging stations, chairs, and restrooms available. Additionally, SDG&E endeavors to provide cellular network services and will collaborate with the telecommunication providers who support services around the CRCs.

More details about SDG&E's CRCs including siting and accessibility will be outlined in its forthcoming CRC plan as required by D.20-05-051.

C. Utility Programs Serve Low-Income and Disadvantaged Communities

Through SDG&E's marketing, 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 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. California Alternate Rates for Energy Program

The CARE program provides a 30% or more discount on natural gas and electricity bills to low-income residents, qualified nonprofit homeless shelters, and qualified group living facilities. Residents must meet household income guidelines (based on number of people in house and total household income). In response to the recent COVID-19 customer impacts, changes have been made to prevent potential customer removal from this program. These changes include the suspension of re-certifications and post-enrollment reviews effective March 4, 2020.

Additionally, all high usage post enrollment verification has been suspended and re-enrollment is available with the 24-month enrollment moratorium.

2. Family Electric Rate Assistance Program

The FERA program provides qualified households with a 18% line item discount on electric every month. Families whose household income slightly exceeds the other low-income energy program allowances, may qualify to receive FERA discounts, which bills electricity usage at a lower rate. Household size and total household income guidelines apply. In response to the recent COVID-19 customer impacts, changes have been made to prevent potential customer removal from this program. These changes include the suspension of re-certifications and post-enrollment reviews effective March 4, 2020.

3. Energy Savings Assistance Program

The ESA program provides no-cost weatherization services to low-income households who meet the CARE income guidelines. 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. Due to COVID-19 and the related health safety guidelines, this program is temporarily suspended.

4. Low Income Energy Assistance Program

The Low-Income Home Energy Assistance Program (LIHEAP) is federally funded and helps low-income households with weatherization services and one-time financial assistance to help balance an eligible household's utility bill. The program is overseen by the California Department of Community Services and Development (CSD) and administered by three local nonprofit agencies in SDG&E's service territory that have funding available to help residents receive weatherization services, one-time financial assistance or one-time crisis assistance toward their outstanding utility bill. SDG&E customers are referred to 211sandiego.org for information.

5. Medical Baseline Allowance Program

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 life support equipment. A completed application form must be 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 in itself to qualify. The customer must have a medical condition verified by a doctor. In response to the recent COVID-19 customer impacts, changes have been made to ease enrollment including providing up to 12 months for the enrollee to provide signed medical authorization and suspending recertifications.

6. California LifeLine Program

The California LifeLine Program (California LifeLine) is a state program that provides discounted home phone and cell phone services to eligible households. The California LifeLine discounts help consumers lower the cost of their phone bills. Only one discount per household is allowed (except for teletypewriter users and for Deaf and Disabled Telecommunications Program participants). Each household must choose to get the discount either on a home phone or on a cell phone.

7. 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.

IV. Customer Preparedness Outreach & Community Engagement

All customer communications and outreach efforts associated with SDG&E's wildfire mitigation measures are part of its Company Wildfire Safety Education initiative. The initiative includes strategies and tactics that will, if successful, result in more empowered and educated customers that will be able to traverse the inherent adversities associated with wildfires. The strategies being deployed as part of the initiative include direct and in-direct customer engagement through community outreach, customer education through marketing and materials, and briefings with key stakeholders.

A. Direct-to-Customer Outreach

Direct customer communications are part of the Company's wildfire safety public-education campaign. These direct communications include, but are not limited to, newsletters, bill inserts and promotional emails for outreach events and webinars. These direct communications complement other tactics associated with the public education campaign. In-language community education materials that consist of important wildfire safety and resiliency messaging will also be included. Campaign messaging will be translated into the "prevalent" languages spoken in the service territory and made available to minority and hard-to-reach audiences through the CBOs that serve them. SDG&E is also working with these organizations to help identify the most effective communication methods and materials to reach these target audiences in 2020. Additional detail on prevalent languages are addressed in SDG&E's Prevalent Language Wildfire Communications Compliance Plan.⁸

⁸ SDG&E Advice Letter 3544-E, Attachment A - Prevalent Languages Wildfire Communications Compliance Plan (May 15, 2020).

B. Medical Baseline Marketing and Outreach Campaign

SDG&E includes MBL promotional messaging as part of its public education campaign. MBL information is also provided to the County OES AFN Working Group and the member organizations are asked to distribute the information to their constituents. In February 2020, SDG&E worked with County OES to send a postcard to approximately 25,000 residents in San Diego County. The postcard promoted SDG&E's MBL program and the County of San Diego's AlertSanDiego program, a resource which helps County residents be prepared during emergencies. The postcard recipient list consisted of Medicare beneficiaries who rely on electricity-dependent medical equipment to live independently in their homes and was accessed from the U.S. Department of Health and Human Services EmPower database. Given the target demographic of this database, many on the distribution list are included in the AFN population. SDG&E will continue to look for similar opportunities to inform and promote the MBL program.

As part of its Outreach Campaign, SDG&E partners with hundreds of local CBOs to help bring awareness to SDG&E's customer program offerings, including MBL. SDG&E will continue to market and promote the MBL program to all customers and CBO partners who help support vulnerable populations to further the message reach. In the past SDG&E has participated in Mobile Home Park forums where it promotes the various customer program offerings available to customers including MBL. Given the safety precautions put into place due to COVID-19, this outreach effort will include doing virtual presentations (or in-person presentations only if allowed to safely) to master metered customers to ensure they know of the program and can enroll if eligible.

C. Participation in Community Events

In 2019, SDG&E hosted six Wildfire Safety Open House events and three Wildfire Safety Fairs. These events brought together more than 30 different internal and external groups focused on wildfire preparedness and safety. SDG&E provided customer education on SDG&E programs and services, system upgrades and projects, generator safety, Meteorology, Public Safety Power Shutoffs, outage notifications, Community Resource Centers and many more. External groups that participated in the events included 2-1-1 San Diego, the American Red Cross, local fire departments and other fire agencies, local CERT groups and more. The community events were a success, reaching over 1,200 customers. SDG&E plans to continue to host these open house and fairs events in the upcoming years.

Due to the current COVID19 restrictions, outreach efforts have been adapted to transition the open house events into webinars. SDG&E plans to host four webinars on various topics including: Wildfire Resilience and Operations, Meteorology, Emergency Management and Vegetation Management. Additionally, it plans to change the Wildfire Safety Fairs into drive-thru events where the communities can continue their safety preparedness efforts by driving through a location to obtain collateral, give-a-ways and more. Similar to last year's events, SDG&E will continue to partner with external agencies, which will allow the communities to remain informed, engaged and prepared.

In addition to the Wildfire Safety Open Houses and Fairs, SDG&E provides utility customer programs information and marketing materials through the Energy Solutions Partner Network CBOs. These CBOs represent vulnerable populations such as low income, seniors and the special needs community. SDG&E's Outreach team attends events throughout the service territory assisting with pre-registration for customer assistance programs, including CARE, FERA, ESA and Medical Baseline. With the new restrictions associated with COVID-19 and

social distancing, SDG&E is partnering with food distribution drive-through events and attending web-based activities to connect customers with programs and resources. This type of effort will continue to evolve and expand the remainder of 2020 as community events are reimagined.

D. CBO Engagement and Community Partnerships

Over the past decade, SDG&E has established great relationships with local CBOs in serving low income and hard to reach populations. SDG&E knows the critical role the CBOs fill in helping to educate the public about SDG&E's services and offerings. CBOs are trusted resources in the community to help disseminate important information. They share information through their various channels including social media, newsletters and (virtual) presentations.

SDG&E has worked closely with its large network of over 400 CBOs to assist with community outreach and education. These CBOs help inform customers about how to sign up or update their contact information for emergency notifications (including PSPS) and promoting wildfire safety and resiliency through a variety of channels including social media, e-newsletters, newsletters and presentations. This CBO network is also provided with presentations and social media posts from SDG&E, which includes information on programs and services such as CARE, FERA and Medical Baseline for the vulnerable populations. The network of over 400 CBOs SDG&E works closely with is made up of organizations it has direct relationships with and those that are members of the County OES AFN Working Group and Partner Relay Network.

As previously mentioned, SDG&E has formed a strong partnership with the County OES AFN Working Group and Partner Relay Network. The County OES AFN Working Group is defined above in the Local Government Advisory Councils and Working Groups section. The Partner Relay Network is a broad network of trusted community organizations such as churches, nonprofits and refugee resettlement organizations who help disseminate information in various languages to their community.

SDG&E continually looks for ways to expand its partnerships with CBOs including finding new CBOs to partner with. These organizations are vital to educate customers about wildfire safety and resiliency. SDG&E plans to expand its partnerships by networking with its current CBOs who in turn provide leads for other CBOs it should partner with. SDG&E also intends to take input from CBOs at the Statewide AFN Advisory Council and in several other local forums.

E. Emergency Preparedness Safety Website

SDG&E maintains a publicly accessible website focused on wildfire safety, as well as other safety areas, including natural gas, electric, trees, generator safety, emergency preparedness and outage information. This information can be found at <http://www.sdge.com/safety>. SDG&E's emergency preparedness brochures, traffic radio IDs, newspaper advertisements, digital ads, and social media postings via Facebook and Twitter, have been used to drive customers to the Company's wildfire safety section: <http://www.sdge.com/wildfire-safety>.

SDG&E also created a landing page that provides resources to assist the AFN communities, particularly for PSPS events (<https://www.sdge.com/AFN>). The page provides information and links for: PSPS notification registration, emergency plan/kit checklists, generator safety, Medical Baseline program and application, CARE, FERA, and ESA. Additional fire or weather-related webpages are actively maintained throughout the incident by SDG&E and are accessible using the following addresses: Weather web pages: <http://sdgeweather.com>; Community Resource Centers: <http://www.sdge.com/resource-centers>.

V. In-Event PSPS Customer Communications

A. CBO Engagement and Community Partnerships

SDG&E plans to continue to implement a strategy to reach out to CBOs and service providers who serve people with disabilities and other access and functional needs. SDG&E works with several AFN CBOs and service providers who help amplify SDG&E's PSPS education efforts and event notifications to the AFN population. SDG&E will share PSPS notifications that include potentially affected zip codes with these CBOs and service providers and request that they share the notification with members of their AFN database that reside in these zip codes. If a member of this population has updated their contact information on their SDG&E account, then the notification from the service providers will be a secondary notification, as these populations will have received notification directly from SDG&E.

As part of its plan to continue to grow its network of CBO partners, SDG&E will also look to expand the number of CBOs and service providers that have this capability to amplify SDG&E's PSPS notification messaging.

B. Event Notifications

Depending on conditions, SDG&E will communicate with customers in advance of an event – 48, and 24 hours as well as 1-4 hours in advance when possible, prior to shutting off power; upon starting safety inspections of affected power lines; and upon re-energization, as practicable.⁹ SDG&E will also reach out to the AFN populations and the organizations that serve them during the same intervals. SDG&E will communicate these notifications to customers in eight languages (English, Spanish, Mandarin, Cantonese, Vietnamese, Korean, Tagalog and Russian). SDG&E has also launched an ongoing campaign asking customers to update their contact information and sign up for outage notifications at sdge.com/MyAccount.

Additionally, SDG&E has recognized the importance of developing a solution to identify and communicate with all people within a de-energized area, including people who may be visiting the area or not directly listed on utility accounts. In 2019, SDG&E created a self-registration portal that enables people not directly listed on utility accounts to create an authenticated account and opt-in for PSPS notifications by zip code(s). Those people may receive notifications by voice, text and e-mail, and they will use this account to maintain their notification preferences, as well as the ability to opt-out of notifications. Both SDG&E customers and non-account holders can sign up for PSPS notifications at sdge.com/notifications.

SDG&E uses this information to reach its customers using its Emergency Notification System (ENS) through phone, text and/or email in advance of a PSPS, if conditions allow, and throughout the event until power is restored. In addition to using ENS, SDG&E is exploring the feasibility of a dedicated PSPS mobile application, which can further improve customer (and non-customer) communications and notifications, including maps of event information, situational awareness, and available resources.

In addition to notifying customers directly, outage updates are provided through social media, local news, radio and SDG&E's website at sdge.com and sdgenews.com. Anticipated PSPS events may be avoided altogether if weather conditions improve. In such instances, SDG&E will

⁹ D.19-05-042 at Appendix A, pp. A-7 to A-8.

notify customers that weather conditions have improved in their area, and SDG&E does not anticipate the need to turn off power for safety. SDG&E also encourages customers to visit sdge.com/wildfire-safety for tips on putting together an emergency preparedness plan for their home or business.

1. Medical Baseline Notifications

As PSPS alert conditions are elevated, SDG&E takes additional steps to reach customers enrolled in the Medical Baseline program, including life support and temperature sensitive customers. Customers are asked to evaluate the safety of their situation and have an emergency plan ready in case of an outage. When communicating with Medical Baseline customers, the ENS system captures a positive physical response when the customer is contacted. If a positive response is not obtained, a second live attempt is made through SDG&E's Customer Call Center. If no contact is achieved with the second attempt, SDG&E field personnel are dispatched to the address of record to deliver the message in person. Failing all else, a door hanger is left altering the customer of the situation.

C. Website

SDG&E maintains a publicly accessible website focused on PSPS, the purpose of which is to:

- Provide accurate, timely information
- Communicate to customers on the channels they prefer
- Deliver consistent messaging across all channels
- Deploy a mobile-first strategy

The website is a “dashboard” of PSPS information, including an address look-up tool (available to AFN customers), at-risk communities, affected communities, CRCs, and other PSPS-related information.

SDGE.com is designed for simplicity and ease of use, placing the customer at the center of the design process. Web customer research, best practices and benchmarking data, as well as web traffic reports, were analyzed to build an accessible website. Making SDG&E's website accessible means customers with visual, hearing, motor and cognitive disabilities can better understand, navigate, and interact with the site. SDG&E's website is built following Web Content Accessibility Guidelines (WCAG).

D. Media

Communication and education are at the core of wildfire safety, ensuring families, businesses and the general public are ready and prepared for wildfire season. This year, all communications and outreach efforts associated with SDG&E's wildfire mitigation measures, including de-energizations, are part of its Company Wildfire Safety Education initiative. The initiative includes strategies and tactics that will, if successful, result in more empowered educated customers that will be able to traverse the inherent adversities associated with wildfires. Communications efforts, specifically all media outreach and advertising, associated with the Company's AFN communities and populations will occur before, during and after a de-energization event.

SDG&E is currently developing and implementing its annual public education program. The pre-wildfire season and de-energization marketing campaign utilizes a suite of media-specific tactics that support and promote the Company's outreach efforts to help prepare all communities, including the AFN and MBL populations, for the wildfire season and the potential use of PSPS. Public education materials consist of messaging that includes, but is not limited to, encouragement to update contact information and sign up for emergency notifications and prepare emergency kits and plans. Media-specific campaign tactics will include platforms such as TV/radio broadcast, newspaper advertising, paid search, digital media, and out of home advertising. Messaging and materials associated with media outreach – in particular, social media – will be targeted and tailored to help advance critical information in support of the Company's AFN and MBL communities.

During a de-energization or wildfire event, SDG&E focuses on providing real-time situational awareness and one-voice communications to the public and various stakeholders including, but not limited to local broadcast media outlets, public safety partners, local governments, tribal governments, CBOs and critical facilities. When an event arises, all communications drive to the SDG&E NewsCenter and sdge.com for the latest information. Information on the website and the Company's accompanying NewsCenter is translated in-language to reach its intended audiences. Broadcast media is also engaged and updated about the de-energization event and SDG&E's efforts to protect affected communities. Broadcast and social media channels are an essential communication resource during de-energization and wildfire events in the service territory. The Company will be creating audience-specific messaging and creative assets for use on these platforms. Additionally, social media platforms such as the Nextdoor app will assist to direct messages to a specific target area or community.

After an event, SDG&E continues to communicate with its affected communities through broadcast and social media regarding event-specific questions and future event preparations. The Company also begins to evaluate its response in its entirety, specifically looking for any process gaps and opportunities for improvement. This extensive communications evaluation will include working with local CBOs to ensure that all media-related language and messaging is effectively reaching the Company's AFN and MBL populations.

E. Call Center Support

Any customer, or concerned person, can contact SDG&E's call centers to obtain information before, during, or after a PSPS event. SDG&E's call centers monitor events as they approach and adjust resource needs accordingly throughout the event. Additionally, to help ensure prompt service to non-English speaking customers, the Customer Care Centers are contracted with the Language Line Service. The Language Line Service offers an interpreter service for several different languages and dialects, which includes, but is not limited to, French, German, Italian, Japanese, Russian, Spanish, Tagalog, and Vietnamese. The Language Line Service is available 7 days a week, 24 hours per day. If the requested interpreter is not available, the requestor will be asked to call back. If the call is an emergency, the ESS will advise the operator in order to have the request prioritized.

F. Emergency Operations Center Role to Support In-Event Communications to CBOs During PSPS event

SDG&E is currently working on finalizing details around an emergency operations center (EOC) role to support in-event communications to CBOs during a PSPS event. SDG&E will provide a status update on this position in its first AFN Plan quarterly update report.