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**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

**PACIFIC GAS AND ELECTRIC COMPANY'S ACCESS
AND FUNCTIONAL NEEDS PLAN FOR PUBLIC SAFETY
POWER SHUTOFF SUPPORT**

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Dated: June 1, 2020

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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In accordance with Conclusion of Law 36 of the California Public Utilities Commission's Phase 2 De-Energization Decision (D.) 20-05-051, Pacific Gas and Electric Company respectfully submits this initial plan regarding its efforts designed to support people and communities with access and functional needs (AFN) during Public Safety Power Shutoff deenergization events (AFN Plan).

Respectfully Submitted,

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Table of Contents

- 1 Introduction3**
- 2 External Feedback and Consultation.....4**
 - 2.1 Customer and Community Feedback and Research 4
 - 2.2 Consultation with Advisory Councils..... 7
 - 2.2.1 PG&E People with Disabilities and Aging Advisory Council.....7
 - 2.2.2 Statewide AFN Council7
 - 2.2.3 Other Advisory Groups.....8
- 3 Customer Programs and Available Resources8**
 - 3.1 Disability Disaster Access and Resources Program 8
 - 3.2 Continuous Power Programs 9
 - 3.3 Programs Serving Medically Sensitive, Low-Income Customers and Disadvantaged Communities 10
 - 3.3.1 Medical Baseline Program.....10
 - 3.3.2 Energy Savings Assistance (ESA) Program11
 - 3.3.3 California Alternate Rates for Energy Program (CARE) / Family Electric Rate Assistance Program (FERA).12
 - 3.3.4 Tribal Engagement.....12
 - 3.4 Community Resource Centers (CRCs) 13
 - 3.5 211 Referral Service..... 14
- 4 Customer Preparedness Outreach & Community Engagement15**
 - 4.1 Direct to Customer Outreach..... 15
 - 4.1.1 Medical Baseline Program Acquisition Campaign15
 - 4.1.2 Meter Metered Tenant Education.....15
 - 4.1.3 Propensity Model to Target Medical Baseline-Eligible Customers.....16
 - 4.2 Health Care Industry Outreach Strategy 16
 - 4.3 Wildfire Safety Open Houses, Webinars and Videos 16
 - 4.4 Participation in Community Events..... 17
 - 4.5 CBO Engagement and Community Partnerships..... 17
 - 4.6 Accessibility and Translation of Communications 18
- 5 In-Event PSPS Customer Communications19**
 - 5.1 Notifications for Medical Baseline and Life Support Customers 19
 - 5.2 2020 Event Notification Improvements..... 20
 - 5.3 Focused Efficiencies to Reduce Medical Baseline Door Knocks 20
 - 5.4 Dedicated CBO Liaison During PSPS Events 21
 - 5.5 Website 21
 - 5.5.1 Website Accessibility.....22
 - 5.5.2 PSPS AFN Focused Website.....22
 - 5.6 Other Forms of PSPS Event Notifications..... 22
- 6 Conclusion23**

1 Introduction

In accordance with Conclusion of Law 36 of the California Public Utilities Commission's (CPUC or Commission) Phase 2 De-Energization Decision (D.) 20-05-051, Pacific Gas and Electric Company (PG&E or Company) respectfully submits this initial plan regarding its efforts designed to support people and communities with access and functional needs (AFN) during Public Safety Power Shutoff (PSPS) de-energization events (AFN Plan).

Based on feedback from customers and other stakeholders, PG&E understands the primary needs related to PSPS amongst AFN customers are emergency preparedness education, continuous power support, access to transportation and food replacement, as well as timely and accurate event information with translated communications. PG&E is committed to providing preparedness education, an improved notification experience and additional services and resources to AFN and medically sensitive customers in advance of and during PSPS events - either directly or in partnership with Community Based Organizations (CBOs). PG&E also recognizes partnerships with CBOs are vital as they have the expertise and trust to meet our AFN customers' needs during emergencies.

As defined in the CPUC PSPS Phase 1 Decision (D. 19-05-042), the AFN population consist of "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."¹ Using a variety of data sources, PG&E has determined that, based on the CPUC's definition of AFN populations, over 80% of residential PG&E customers are estimated to have one or more AFN attributes, and just over 70% are located in a Tier 2 or Tier 3 High Fire Threat District (HFTD).

PG&E's AFN Plan includes a summary of the research, feedback and external input that has shaped the AFN population support strategy before and during PSPS events, the programs that serve these customers, the preparedness outreach approaches that are focused on vulnerable populations, and the in-event customer communications that serve AFN populations. PG&E will also provide quarterly updates to the Commission regarding the progress towards meeting the established AFN plan described herein, and the impact of its efforts to address this population during de-energization events.

This AFN plan also accounts for requirements and leverages plans and resources authorized from overlapping proceedings, including the Wildfire Mitigation Plan (Rulemaking (R.) 18-10-007), Self-Generation Incentive Program (SGIP) (R. 12-11-005), Low Income Programs (A. 19-11-003), and Disconnections (R. 18-07-005).

PG&E has previously described its approaches for supporting and communicating with customers in its

¹ PSPS Phase 1 Decision, D.19-05-042 at pp. A6 – A7.

2020 Wildfire Mitigation Plan (Sections 5.3.9 and 5.6.2),² which applies to all vulnerable populations within its territory. This AFN plan, however, is focused on PG&E's approaches for serving its most vulnerable customers leading up to and during PSPS events. These most vulnerable customers include low-income, medically sensitive, and/or limited English proficiency customers.

For details on PG&E's plan to support customers with limited English proficiency, PG&E references its 2020 Community Wildfire Safety Program (CWSP) Outreach Workplan and Budget (CWSP Outreach Workplan), which includes the translated communications approaches, channels and plans for implementation.³ PG&E intends to report the progress of its translation strategy in the quarterly AFN progress updates.

Finally, please note that the scope of this AFN plan is specific to PSPS support and does not include all accessibility-related activities undertaken by the Company.

2 External Feedback and Consultation

PG&E is focused on listening to its customers and key partners to understand needs and desires of potentially impacted communities to account for and act on the feedback received in its design, implementation and identification of opportunities to improve its support to vulnerable customers. The following section describes PG&E's approaches for collecting feedback from customers and key partners, which enable PG&E to more strategically act on the lessons learned through outreach, community partnerships and notifications, as applicable.

PG&E is focused on continuously learning from previous PSPS events and listening to its customers and key partners about how the Company can improve by collecting feedback and taking action to enhance customers' experience.

2.1 Customer and Community Feedback and Research

In 2019 and early 2020, PG&E solicited and evaluated customer feedback about the PSPS program, including support and services offered to customers and communities, as well as PG&E's implementation of the PSPS protocols. Feedback was obtained through a variety of channels, including listening sessions and working groups with local governments, tribes, and critical facilities, open houses and webinars held with customers and communities, wildfire and PSPS awareness studies, feedback received on digital channels, co-creation sessions with customers, partners and PG&E employees, notification message testing, and a PSPS experience survey.

As a result of this research, PG&E has focused on the following customer-related improvements, including reducing wildfire potential, improving situational awareness and reducing the impacts of PSPS events on customers and communities. This includes reducing the potential number of impacted

² https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2020-Wildfire-Safety-Plan.pdf

³ Advice Letter 4249-G/5827-E.

customers and duration and frequency of events, as well as providing timelier and more accurate event information for all stakeholders, revising content of customer notifications, optimizing approaches for providing translations, and providing more resources to vulnerable customers. PG&E's bi-weekly corrective action report more fully describes these customer feedback channels.⁴

Additionally, in order to gain the most holistic understanding of the Medical Baseline Program, PG&E conducted research focused on the Medical Baseline Program, including program awareness, customer experience, and PSPS related awareness and notifications. This research was conducted in three phases:

1. One-on-one interviews with customers with qualifying medical issues to get the perspectives of current, former, and prospective Medical Baseline enrollees. Interviews were conducted with sixteen customers in October 2019.
2. An online discussion with twelve healthcare practitioners (HCPs), followed by select one-on-one phone interviews with HCPs drawn from the online group. Online discussion board and interviews were conducted in October and November 2019.
3. A broad survey of almost 1,000 current, former, and prospective Medical Baseline customers to measure customer experiences, awareness, and motivations to sign up for the Medical Baseline Program, and to measure customer experiences leading up to, during, and after Public Safety Power Shutoff (PSPS) events. This research was conducted in December 2019 and January 2020.

The following are key findings from the research about the Medical Baseline Program and PSPS events:

- Medical Baseline Program Awareness: Current and former Medical Baseline customers recalled learning about the Medical Baseline Program through their physician (29%) or friends, family, and neighbors (23%). For prospective Medical Baseline customers (those with qualifying medical issues not currently enrolled in the program), two out of three were not aware of the Medical Baseline Program.
- Medical Baseline Program Satisfaction: Medical Baseline Program satisfaction is very high (75% are very satisfied), and satisfaction remains steady regardless of how long a customer has been in the program.
- Medical Baseline Program Benefits: The vast majority of current and former Medical Baseline customers considered the two main program benefits as *very important* or *extremely important*: (1) Saving Money, and (2) additional PSPS notifications.
- Medical Baseline Program Application: More than 90% of customers said it was *very easy* or *somewhat easy* to complete the Medical Baseline application and/or get the forms certified

⁴ See PG&E's PSPS corrective action report filed bi-weekly in compliance with January 30, 2020 Assigned Commissioner's Ruling (section 2.a. and 2.l.), which describes in more detail the feedback PG&E solicited after 2019 PSPS events from local governments and its customers, respectively.

by a health care practitioner. The application timeline is relatively short for most customers: 43% were enrolled within 30 days, and only 4% recalled the process took longer than 90 days.

- Recertification Process for the Medical Baseline Program: Many Medical Baseline customers are not aware of the recertification process or that they need to recertify to stay in the program.⁵
- Optimal Partners to Promote the Medical Baseline Program: When asked, the majority of responses from customers suggested that the optimal partners that PG&E should work with to inform them about the Medical Baseline Program were health care practitioners.
- PSPS Awareness: All (100%) of current and former Medical Baseline customers are aware of PSPS, regardless of whether they were impacted by PSPS deenergization, and 93% of prospective customers are aware of PSPS.
- PSPS Notifications: More than 75% of customers impacted by PSPS find PG&E notifications valuable. Of the customers who recalled receiving notifications, the majority felt that they had received the right number of notifications.
- PSPS Emergency Preparedness: PSPS-impacted customers took on average six different actions to prepare for a PSPS. Fewer than 2% of customers reported taking no actions to prepare.
- Information During a PSPS: Customers impacted by PSPS primarily relied on PG&E notifications and family and friends for information.

These findings suggest that, once enrolled in the Medical Baseline Program, customers are generally satisfied but there remain opportunities to drive program awareness and improve enrollment. PG&E directly addresses these findings by the propensity modeling and subsequent outreach campaign, including developing a health care practitioner awareness strategy, as described in Section 4.1.

Additionally, in May 2020, PG&E conducted AFN-focused collaboration sessions with a diverse group of AFN customers to develop solutions to mitigate the impacts of PSPS, in particular, for this customer population. PG&E is finalizing the outcomes and will report progress in its upcoming quarterly report.

Moving forward, PG&E will continue to proactively seek feedback from its customers and relevant partners, agencies and organizations such as CBOs, to evaluate more opportunities to improve its programs and services for customers. In the Wildfire Mitigation Plan proceeding community outreach decision (D.20-03-004), the Commission requires that the electric investor-owned utilities (IOUs) demonstrate that their communications and outreach are effective through surveys and metrics. PG&E is presently engaged in a coordinated effort with other electric IOUs to measure outreach effectiveness in 2020. CBOs will contribute to the survey instrument(s), and PG&E will use success metrics that can be sufficiently measured through the survey(s).

⁵ In light of the shelter-in-place restrictions imposed by the COVID-19 pandemic, PG&E has waived the requirement that customers secure a physician's verification of disability to qualify for MBL recertification.

PG&E views CBO and customer feedback, in combination with post-PSPS event reviews, to be important parts of its on-going continuous improvement process.

2.2 Consultation with Advisory Councils

PG&E is committed to engaging with interested parties and advisory councils to gain feedback on its approaches for serving customers before, during and after PSPS events. In 2020, PG&E launched the regional-focused AFN advisory council. PG&E is actively collaborating with SDG&E and SCE to develop the Statewide AFN advisory council.

2.2.1 PG&E People with Disabilities and Aging Advisory Council

In April 2020, PG&E launched an AFN-focused advisory council, called People with Disabilities and Aging Advisory Council (PWDAAC). The PWDAAC is a diverse group of recognized CBO leaders supporting people with developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, and older adult communities, as well as members and advocates from within these communities.

The Council provides independent expertise to help ensure that PG&E's customer programs, operations, and communications incorporate best practices to support these populations now and in the future. The Council will:

- Actively identify issues, opportunities, and challenges related to PG&E's ability to minimize the impacts of wildfire safety (including Public Safety Power Shutoffs), and other emergencies to Northern and Central California over the long term;
- Serve as a sounding board and offer insights, feedback, and direction on PG&E's customer strategy, programs and priorities; and
- Share experiences, perspectives, and best practices for improving PG&E's customer performance.

PG&E will convene the Council for at least four in-person meetings per year. To create momentum, the Council and PG&E have agreed to initially meet on a monthly basis to help PG&E improve its PSPS and Medical Baseline and AFN program performance from 2019. Once momentum has been established, these meeting will move to quarterly. Ideally, the meetings will be in-person, however, given the current COVID-19 pandemic conditions, online forums (e.g., WebEx) will be utilized until in-person meetings are safe to conduct.

2.2.2 Statewide AFN Council

PG&E is actively working with the other California electric IOUs to establish the Joint IOU Access and Functional Needs Advisory Council. The joint IOUs will seek engagement with members, advocates, and leaders across all populations identified as vulnerable, to inform a more holistic and strategic view on how to help the many constituencies served by the utilities. The joint IOUs will convene the Council for no less than four meetings per year. Ideally the meetings will be in-person; however, given the current COVID-19 pandemic conditions, online forums (e.g., WebEx) will be utilized until in-person meetings are safe to conduct. The first meeting is scheduled to take

place over two days via WebEx on June 15 and 18, 2020.

2.2.3 Other Advisory Groups

PG&E will also continue to engage with and solicit feedback on its AFN Plan from other existing advisory groups, including:

- **Disadvantaged Communities Advisory Group:** An advisory group that meets quarterly led by the CPUC and California Energy Commission (CEC), with representatives from disadvantaged communities. The purpose of this group is to review and provide advice on proposed clean energy and pollution reduction programs and determine whether those proposed programs will be effective and useful in disadvantaged communities. PG&E engages with this group to provide information and gain input about its wildfire mitigation activities, including PSPS.
- **Low Income Oversight Board (LIOB):** A board established to advise the CPUC on low-income electric and gas customer issues and programs. PG&E also engages with this group to provide information and gain input about its wildfire mitigation activities, including PSPS.
- **Local Government Advisory Councils and Working Groups:** Pursuant to the PSPS Phase 2 Decision (D.20-05-051), PG&E will include representatives from the AFN community on both the PSPS Regional Working Groups and PSPS Advisory Board. PG&E is in the process of establishing these coordination venues. Additionally, PG&E hosts local wildfire safety sessions with each County Offices of Emergency Services (OES) in advance of wildfire season. PG&E's plans to support AFN populations are included in these sessions for awareness and opportunity for feedback.
- **Communities of Color Advisory Group:** PG&E will continue to solicit input from its Communities of Color Advisory Group which assists PG&E in crafting outreach and engagement with communities on color on a broad spectrum of issues impacting diverse communities.

3 Customer Programs and Available Resources

To aid in the support and preparedness of PG&E's most vulnerable customers, PG&E provides AFN customers a broad range of programs and resources before and during PSPS events. PG&E is committed to continuously identifying improvements and new opportunities and describes its approaches for support below.

3.1 Disability Disaster Access and Resources Program

PG&E recognizes that additional support is needed for vulnerable customers during PSPS events – in particular those who rely on electricity for medical needs. Recently, PG&E solidified its partnership with the California Foundation for Independent Living Centers (CFILC)⁶ and launched the Disability

⁶ CFILC is a registered 501(c)(3) non-profit corporation that increases access and equal opportunity for people with disabilities by building the capacity of Independent Living Centers throughout California. In addition to operating as

Disaster Access and Resources Program.⁷

The pilot disaster readiness program is being implemented by participating local Independent Living Centers (ILCs) associated with CFILC.⁸ The program will enable the local centers to provide qualifying customers who use electrical medical devices with access to backup portable batteries through a grant, lease-to-own or the FreedomTech low-interest financial loan program. Transportation resources, lodging and food, emergency planning, education and outreach about PG&E programs, such as the Medical Baseline Program, will also be part of the program. Applications for portable backup batteries will be available online and at participating ILCs across the state. Individuals who use life-sustaining electrical support will be the highest priority to receive backup batteries. The CFILC's Disaster Resource Advisory Committee will determine battery recipients based on the applications received.

3.2 Continuous Power Programs

Through the Self-Generation Incentive Program (SGIP), PG&E customers can access incentives to install permanent battery storage systems. The SGIP increased incentives to those who are more vulnerable during power outages. Anyone can apply for SGIP incentives, and residential customer incentives reflect income status, location, medical/essential needs, and likelihood to be deenergized in a PSPS event.⁹

To demonstrate its marketing and outreach approaches, on February 20, 2020, PG&E filed its SGIP-related Residential Equity Resiliency Marketing Plan and Implementation Strategy (Advice 4219-G/5765-E). In this plan, PG&E proposes ways to improve awareness and encourage adoption of the Medical Baseline program for qualified customers in the High Fire Treat Districts (HFTDs). PG&E's strategies include partnering with outreach-focused contractors and CBOs, training local Independent Living Centers (ILCs), and more.

Additionally, PG&E is actively exploring options to provide financial assistance to Medical Baseline and income-qualified residential customers to remove SGIP installation barriers and increase contractor

a membership organization, CFILC has several statewide programs and campaigns that focus on different areas of disability advocacy and provide avenues of success for both their members, the IL Network and, more importantly, people with disabilities of all ages who chose to live independently in their community of choice.

⁷ See press release issued on April 29, 2020:

https://www.pge.com/en/about/newsroom/newsdetails/index.page?title=20200429_pge_cfilc_announce_program_to_support_vulnerable_customers_in_preparation_for_public_safety_power_shutoff_events

⁸ ILCs are grassroots organizations run by, for, and about people with disabilities. CFILC's membership includes 23 of California's 28 ILCs and 56 of the state's 58 counties. ILCs provide advocacy services to people across all types of disabilities. Services include peer support, information and referral, direct advocacy, systems change advocacy, housing, assistive technology, independent living skills training, transition and personal assistance services.

⁹ Customer eligibility for the SGIP program equity resiliency budget is more fully described in D.19-09-027 and further clarified in D.20-01-021. For residential customers, key eligibility is focused on either Medical Baseline customers, or customers that have experienced two or more discrete PSPS events that have the "least ability to fund a storage system."

throughput. On March 6, 2020, PG&E filed Advice Letter (Advice) 4226-G/5778-E, requesting Commission approval to establish a Financial Assistance pilot within the SGIP Equity Resiliency Budget. Part of this pilot would provide an advance payment incentive for contractors to reduce installation cost barriers for Medical Baseline customers in Tier 2 and Tier 3 HFTDs to allow for increased access to the incentives in this budget.¹⁰

PG&E will continue to spread awareness and educate customers on commercially available temporary backup power options not available through SGIP, and point customers to options for acquiring portable battery backup power via www.pge.com. Additionally, PG&E is actively exploring opportunities and funding to provide a portable battery pilot program to assist qualifying low-income, Medical Baseline customers in Tier 2 and Tier 3 HFTDs to prepare for PSPS events.

3.3 Programs Serving Medically Sensitive, Low-Income Customers and Disadvantaged Communities

Throughout the year – before, during and after PSPS events – PG&E will continue to promote relevant programs that serve AFN customers to support safety and preparedness, rate discounts, energy efficiency programs and resiliency. PG&E uses these programs to assist low-income and disadvantaged communities with reducing their energy burden.

3.3.1 Medical Baseline Program

The Medical Baseline Program, also known as Medical Baseline Allowance, is an assistance program for residential customers who have special energy needs due to qualifying medical conditions. The program includes two different kinds of help for customers:

1. **A lower rate on the customers' monthly energy bill:** All residential customers receive an allotment of energy every month at the lowest price available on their rate, called the Baseline Allowance. Customers who are eligible for Medical Baseline receive an additional allotment of electricity and/or gas per month (approximately 500 kilowatt-hours (kwh) of electricity and/or 25 therms of gas per month. This helps ensure that more energy to support qualifying medical devices is available at a lower rate.
2. **Extra notifications in advance of a PSPS event:** Medical Baseline customers who are identified as potentially being impacted by a PSPS event will receive a customized notification via phone, text and email that requests a confirmation of received notification. We send additional notifications to these customers to attempt to verify receipt of notifications, with hourly notification retry attempts for those customers who have not confirmed receipt of their notification and site visits (referred to as “door knocks”) if notifications were not

¹⁰ The current Equity Resiliency Budget of \$44 million, available for both qualifying residential and non-residential customers, is temporarily oversubscribed after the opening of the SGIP program in May 2020. PG&E is accepting new applications, which will be added to a waitlist. PG&E submitted Advice letter 4237-G/5808-E seeking authorization of the release of the additional four-year program budget (2020-2024) in PG&E territory of approximately \$225 million. In the coming months, PG&E anticipates a CPUC decision to release these program funds.

previously confirmed by the customer as received. These extra notification steps are intended to ensure our medically sensitive customers know when to prepare and activate their emergency plans.

To qualify for the Medical Baseline Program, typically, a California-licensed medical practitioner certifies that a full-time resident in the home has one of the following medical issues that requires heating and/or cooling and/or it is medically necessary to prevent deterioration of the patient's medical condition: Paraplegic, quadriplegic, hemiplegic, multiple sclerosis or scleroderma, a compromised immune system, life-threatening illness, or any other condition.

In light of the COVID-19 pandemic, shelter-in-place requirements and customers' limited access to medical practitioners, PG&E made significant revisions to its Medical Baseline Program requirements for the coming year. On May 1, 2020, PG&E filed in Advice Letter 4244-G/5816-E, which included the following modifications to the Medical Baseline Program:

- Allowing customers to self-certify their eligibility to enroll in the Medical Baseline Program without a signature from a qualified medical professional;¹¹
- Suspending all customer removals from the Medical Baseline Program; and
- No longer sending forms to customers that require them to re-certify for the Medical Baseline Program through a doctor or other eligible medical professional.

PG&E will continue to monitor parallel proceedings that may influence the Medical Baseline program design (e.g., Disconnect Proceeding (R. 18-07-005)) and explore further program enrollment and recertification criteria after the 2020 wildfire season and before these program modifications expire in April 2021.

3.3.2 Energy Savings Assistance (ESA) Program

The ESA program provides free home weatherization, energy-efficient appliances and energy education services to income-qualified PG&E customers¹² throughout our service territory. The ESA program^{13,14} emphasizes long-term and enduring energy savings, serving all willing and eligible low-income customer populations by providing all feasible ESA program measures at no cost to the customer through a direct-install approach are eligible to participate. The ESA program is available to both homeowners and renters and all housing types.

In February 2020, PG&E submitted Advice 4212-G/5756-E seeking authorization to leverage its

¹¹ Signature by a qualified medical practitioner is not required to apply but may be required to remain on the program beyond one year.

¹² To qualify for the ESA program, a residential customer's household income must be at or below 200% of FPG, as required in D.05-10-044.

¹³ Authorized in D.16-12-022 as modified by D.17-12-009.

¹⁴ The 2017-2020 ESA program continues to follow the policy and guidance outlined in D.07-12-051, which required the IOUs to offer all eligible customers the opportunity to participate in the program, and to offer participants all cost-effective energy efficiency measures by 2020.

ESA program contractors to distribute and install clean energy storage units to vulnerable, low-income customers subject to PSPS events in support of a new California Air Resources Board (CARB) program. This offering will not be funded by customers. Instead, the program is funded by Kohler Co directly to the ESA contractor Richard Heath Associates (RHA), as an outcome of settlement agreement between CARB, the U.S. Environmental Protection Agency (EPA) and Kohler Co. The program proposes to deliver approximately 1200 units (battery and recharging solar panel) in PG&E territory between mid-October 2020 to February 2021. Battery storage units will be provided on first-come, first-served for customers meeting the following criteria: reside in a Tier 2 or 3 HFTD, qualify for ESA, and not currently enrolled in the Medical Baseline program.

PG&E's ESA program contractor network is made up of many CBOs that have close ties to the communities in which they serve, and we believe this will continue to be an important channel for PG&E's PSPS outreach. In addition to the program offerings to qualifying customers, PG&E includes emergency planning education as part of the on-boarding and regular training with ESA contractors, so these contractors can share emergency preparedness and PSPS messaging with ESA program participants. Furthermore, PG&E has requested funding for its future ESA program¹⁵ to be able to distribute YETI coolers to ESA participants who reside in Tier 2 or 3 HFTD. PG&E will begin providing these resources once this funding is authorized (expected by 2022).

PG&E's ESA program has recently been on pause due to the current COVID-19 shelter-in-place orders. Contractors will resume program activities on June 1, 2020.

3.3.3 California Alternate Rates for Energy Program (CARE) / Family Electric Rate Assistance Program (FERA)

The California Alternate Rates for Energy Program (CARE) and Family Electric Rate Assistance Program (FERA) are PG&E discount programs that help eligible customers pay their energy bills. Over 1.4 million customers are receiving bill discounts through these two programs. The CARE program offers a monthly discount of 20% or more on gas and electricity. Participants qualify through income guidelines or if enrolled in certain public assistance programs. The FERA program offers a monthly discount of 18% on electricity for households with three or more people and must self-certify qualification based on income guidelines.

Trainings provided to both CARE and FERA outreach contractors highlight emergency preparedness programs, as well as a PSPS overview, to be used in holistic customer education about relevant PG&E programs during enrollment.

3.3.4 Tribal Engagement

PG&E is also working with tribal governments to prepare their communities for PSPS events and obtain feedback from those that were impacted by PSPS events, including seeking input on opportunities to address Medical Baseline and AFN populations within their communities. After the 2019 PSPS events, PG&E held four group tribal listening sessions with 30 tribes in four

¹⁵ Funding requested in Application (A.) 19-11-003: PG&E's six-year Energy Savings Assistance and California Alternate Rates for Energy Programs and Budget for the 2021-2026 Program Years.

counties, five individual listening sessions with tribal governments and two tribal health facilities impacted by the October and November 2019 PSPS events to listen to concerns, gather feedback and improve coordination going forward.

PG&E is actively working with tribes in the following ways related to PSPS and emergency preparedness:

- Engaging with the California Rural Indian Health Board in their request of Congressional support to obtain funding for backup generation for all tribal health facilities in the state of California;
- Coordinating with the Indian Health Service (the federal agency that oversees operations and maintenance of tribal drinking water systems) to conduct a needs assessment for tribal drinking water and wastewater systems, including the identification of smaller, private drinking water systems on tribal lands that are not a part of the larger municipal tribal drinking water and wastewater systems;
- Participating in a California Governor's Office of Emergency Services (CalOES)-established working group, including United States Environmental Protection Agency (U.S. EPA), the Indian Health Services, the U.S. Department of Agriculture (USDA) and electric IOUs, which includes a goal to identify funding for backup power for tribal drinking water and wastewater facilities. Since August 2019, 39 such facilities have been identified. As of May 2020, 19 facilities have received backup generation for their drinking water systems and are in the process of installation, 13 have identified potential funding, and 7 remain unfunded with no funding identified as yet. PG&E is also working to support the installation of backup generation for these facilities;
- Seeking input from tribes to identify critical facilities within their jurisdictions, including the identification of drinking water meters and health facilities, to improve PG&E's situational awareness of these systems during PSPS events, for earlier restoration where possible; and
- Conducting Wildfire Safety Working Sessions with tribal, county and local governments. These are held at the county level and include all tribes geographically located within a county.¹⁶ Each presentation enables tribes to obtain additional information and services for tribal AFN community members.

PG&E will continue to listen to customers and interested partners to explore additional opportunities to serve its most vulnerable customers during PSPS events.

3.4 Community Resource Centers (CRCs)

In an effort to minimize public safety impacts as a result of the loss of power upon implementing PSPS protocols, and to serve our communities and more vulnerable customers during PSPS events, PG&E

¹⁶ Some tribes' reservation lands cross into multiple counties and are invited to each county session.

opens CRCs in potentially impacted counties and tribal communities to provide customers and residents a space that is safe, energized and air-conditioned or heated (as applicable). At these centers, PG&E provides the following amenities and resources to customers: PSPS event information, drinks such as bottled water, coffee/tea, non-perishable snacks, ice, blankets (upon request / as needed), and power strips to meet basic charging needs, including charging for cell phones and laptops, small medical devices. CRCs will meet Americans with Disabilities Act (ADA) requirements, be environmentally compliant, and have access to Wi-Fi and cellular service when and where possible.

PG&E's 2020 CRC plans will incorporate the new requirements as an outcome of the CPUC PSPS Phase 2 D. 20-05-051, including extending operating hours from 8am to 10pm, working to ensure reliable cellular service at CRC sites, and bolstering efforts to ensure ADA-compliance and accessible paths of travel.

PG&E's goal is to secure CRC locations throughout its service area in advance of PSPS events. While PG&E planned to predominantly use hard-sided (indoor) buildings for CRCs in 2020, replacing the outdoor tented sites used in 2019, the COVID-19 pandemic and shelter-in-place/social distancing requirements have impacted the ability to complete necessary inspection of and upgrade to identified hard-sided sites. PG&E is now planning to supplement the indoor sites with outdoor open-air tents (micro sites) and mobile centers (e.g., vans) and will coordinate closely with local governments and tribes to adhere to local pandemic requirements. The number of hard-sided CRC sites that will be ready to use for 2020 PSPS events depends on the pace at which local economies are able to recover and address public health safety risks from the COVID-19 pandemic. Additionally, the number of CRC sites to be activated for each county or tribe will depend on the scale of an individual PSPS event.

Currently, PG&E's goal is to secure 112 hard-sided and 30 mobile sites in its territory prior to September 1, with most located in counties and tribes most likely to be impacted by a PSPS event. Given the current COVID-19 environment, PG&E is working toward this goal while implementing contingency plans for the CRC mobilization during events, including outdoor tented sites and mobile CRCs, as described above.

The progress of the CRC planning is reported in PG&E's PSPS corrective action report filed bi-weekly in compliance with January 30, 2020 Assigned Commissioner's Ruling (Section 2.k. and associated Appendix A: CRC Project Status).

3.5 211 Referral Service

Through PG&E's charitable giving program, PG&E continues its sponsorship of the Interface Children & Family Services 211 program (211) as an additional channel to help support communities in times of disaster. The 211 service is a free, confidential calling and texting service that helps people across California find needed local health and social service resources. The 211 service plays a critical role in providing information and support related to the current COVID-19 pandemic, as well as in times of disasters including wildfires and during PSPS events, helping to relieve non-emergency calls to 911. During PSPS events, PG&E will provide regular updates to Interface Children & Family Services 211 Program.

PG&E's sponsorship helped extend 211 coverage to all 58 California counties, 18 of which were

previously unserved by 211, connecting more Californians to health information, social services and referrals through a comprehensive resource database via call specialists and texting. Support is available 24 hours a day, seven days a week, in English, Spanish, Cantonese, Mandarin, and nearly 200 other languages via interpreter service.

4 Customer Preparedness Outreach & Community Engagement

4.1 Direct to Customer Outreach

PG&E will continue to leverage a variety of channels to execute direct to customer outreach to grow program awareness and participation of the Medical Baseline Program, as well as prepare vulnerable customers for PSPS events.

4.1.1 Medical Baseline Program Acquisition Campaign

PG&E will continue to use a variety of channels and a robust campaign to grow program awareness and participation of the Medical Baseline Program, including issuing paid media, direct mail, email newsletters, and bill inserts, as well as providing informational webinars and maintaining a website with program information.

PG&E is cross-promoting the program through a variety of other relevant PG&E channels (e.g., CARE / FERA outreach, sharing materials with ESA contractors, and including Medical Baseline Program information in a PG&E “welcome package” provided to new residential customers).

Customers with the highest likelihood to qualify for and enroll/participate in the Medical Baseline Program (using the propensity model described in Section 4.1.3) will receive direct mail and email marketing that includes a program overview, benefits, and application with remit envelope.

PG&E will also continue program education among existing Medical Baseline customers to reinforce their program awareness, provide preparedness information and resources, encourage updating of contact information and remind Medical Baseline customers to acknowledge notifications during PSPS events.

4.1.2 Master Metered Tenant Education

PG&E also drives awareness of the program to customers that are tenants of master metered accounts. This includes sending a tenant education kit to master metered owners via direct mail and email (if an email address is available). This kit contains a letter to remind master meter owners to maintain contact information for their tenants and pass PSPS notification details to their tenants in the event of a PSPS event, as well as provides PSPS overview flyers that can be posted in communal areas.

Furthermore, medical baseline master meter customers are provided a letter encouraging them to call and update their contact number on file. This is managed separately from customer of record data and leveraged during a PSPS event to (1) send direct PSPS notifications via phone, (2) include these customers in the medical baseline door knock process if the phone notification is not acknowledged.

4.1.3 Propensity Model to Target Medical Baseline-Eligible Customers

PG&E research (as reviewed in Section 2.1) has confirmed that the Medical Baseline Program is likely undersubscribed. Therefore, PG&E developed and will leverage a new propensity model to identify residential customers with the highest likelihood to qualify for and enroll and participate in the Medical Baseline Program. PG&E will use this model to design its 2020 Medical Baseline Program awareness campaigns to encourage adoption of the Medical Baseline Program for those who are not already enrolled.

To develop this model, over 300 independent variables were examined and iteratively tested against the population of Medical Baseline customers to find an optimal shortlist of "qualified predictors" for enrollment. The variables tested included hourly usage, payment patterns, call patterns / use of PG&E contact center services, PG&E program participation, census data, customers who self-identify as disabled, vulnerable or senior when being contacted in instances of disconnections and more.

The validated model has a 72% prediction accuracy at present. We have used the model results to classify customers into propensity deciles for recommended target marketing. PG&E can revisit and fine-tune the model to further improve performance and predict Medical Baseline Program enrollment propensity.

4.2 Health Care Industry Outreach Strategy

As described in Section 2.1, PG&E recognizes that engagement with health care practitioners, medical associations and medical device suppliers is a key opportunity to encourage enrollment in the Medical Baseline Program. To supplement the multi-channel acquisition strategy described above, PG&E is developing a Health Care Industry outreach strategy. This strategy will include identify the appropriate industries (e.g., major health care providers, County Health and Human Services, In Home Support Services, social workers, medical device suppliers, medical associations) and the right contacts to share messaging.¹⁷

PG&E will work to educate these contacts about our Medical Baseline Program to encourage awareness and enrollment, including a Medical Baseline Program fact sheet that will be translated in 12 languages. This fact sheet highlights the savings and safety benefits of the Medical Baseline Program for people with vulnerable energy needs. The fact sheet can be used to educate both healthcare providers and their patients. However, the COVID-19 pandemic is placing a heavy burden on health care providers and limiting the health care industry's ability to support PG&E's Medical Baseline Program recruiting goals.

4.3 Wildfire Safety Open Houses, Webinars and Videos

In 2019, PG&E conducted 23 open houses and 6 webinars to provide an overview of PG&E's CWSP, PSPS decision-making protocols, and approaches to prepare for PSPS-related outages. PG&E had

¹⁷ PG&E's existing contacts with these organizations are either operational in nature for PSPS, or billing-related contacts. PG&E will need to determine new contacts at these organizations.

intended to nearly double the number of open houses offered throughout the territory in 2020 to cover identified areas of improvement based on after-action reviews by PG&E, as well as city, county, tribal, customer, and other stakeholder feedback. Webinars were planned to supplement the open houses for customers who did not attend an in-person open house. But due to COVID-19-related shelter-in-place orders, PG&E is now conducting all open houses in a localized webinar format and holding these webinars weekly between April 29, 2020 and August 5, 2020.

As described in PG&E's CWSP Outreach Workplan,¹⁸ PG&E is also actively exploring new approaches to inform customers and supplement the webinars, including the creation of short (30 second) videos, longer 5-minute videos and an extended 30-minute informational program. These videos will provide a high-level overview of expectations and protocols for PSPS for the territory. Additionally, PG&E will cover content discussed during PG&E webinars, including approaches to mitigate for wildfire risk and how customers can prepare for emergencies.

4.4 Participation in Community Events

In 2020, PG&E planned to mirror the 2019 community engagement strategy, participating in over 240 community events focused on customers with disabilities, seniors, and low-income customers. Unfortunately, due to COVID-19, PG&E has been able to participate in just 13 events to date because our community partners were unable to engage on the original schedules. PG&E recently began to identify a few virtual hosted events and plans to participate. As shelter-in-place orders are lifted and it becomes safe for PG&E employees and customers to gather, PG&E intends to reach out to organizers of previously cancelled events to identify rescheduled opportunities.

4.5 CBO Engagement and Community Partnerships

PG&E recognizes the important roles that CBOs play in the community, with established relationships and the ability to serve as a trusted communications channel to customers. PG&E coordinates with CBOs that have existing relationships and serve a variety of populations, including disadvantaged and/or hard to reach communities, to conduct outreach to customers before a PSPS event and/or during PSPS events. PG&E continues to engage with a diverse group of CBOs to identify contacts, resources, and communication capabilities.

PG&E is actively engaged with over 200 CBOs to provide education and awareness information to its customers through a variety of channels including the contractors that serve PG&E's Low Income Programs (described in section 3.3). PG&E's CBO Direct program empowers non-profits with resources to support the distribution of important safety messaging to their networks of customers in Tier 2 and Tier 3 areas. Furthermore, PG&E provides PSPS preparedness webinars in advance of wildfire season to a variety of focused sectors, such as schools, telecommunications, and water agencies. One of these focused webinars is for AFN organizations to highlight the resources and services available to them and their constituents before and during PSPS events.

PG&E communicates with additional CBOs (beyond our active partner roster) during PSPS events,

¹⁸ Advice 4249-G/5827-E at section 4.4 (p. 11).

sharing PG&E's PSPS information toolkit and/or provides one-to-one direct e-mail communications to CBOs. PG&E continues to reach out to CBOs that are not currently engaged. Most of the CBOs have expressed interest in engaging with PG&E through an informational partnership, and some have indicated capabilities beyond information-sharing, but will require funding to provide these resources during a PSPS event.

PG&E is exploring how to effectively partner with additional CBOs to meet the needs of our AFN customers, including developing resource (e.g., paid) partnerships beyond the educational partnerships that have been established. PG&E will continue to seek feedback and adopt recommendations from the variety on AFN advisory councils and oversight boards as described in section 2.2.

4.6 Accessibility and Translation of Communications

PG&E provides translated communications to customers before, during and after a wildfire and/or PSPS event. In 2019, PG&E provided translated communications in six written languages (seven spoken languages): Spanish, Chinese (spoken: Cantonese and Mandarin), Vietnamese, Tagalog, Russian, and Korean. In response to CWSP Phase 2 D. 20-03-004, PG&E expanded its language translation offerings to six additional languages, as well as indigenous languages: Arabic, Punjabi, Farsi, Japanese, Khmer, and Hmong. In PG&E's May 15, 2020 Advice Letter 4249-G/5827-E, PG&E describes its approach for identifying prevalent languages in its territory based on the definition of "language prevalence" and data sources authorized to determine language prevalence in accordance with D.20-03-004. Additionally, PG&E describes the communication and outreach channels that will be leveraged before, during and after a wildfire and/or PSPS event, as well as the associated translations progress and plans. Please refer to this plan for more detail about the CWSP outreach and communication plans, and associate translations which are planned in 2020.

Furthermore, PG&E maintains a contact number, e-mail address, as well as an online mailbox on www.pge.com for customers to request forms and brochures in alternate formats. PG&E continues to receive requests for communications in Braille, large print, and audio formats from customers using the online mailbox or by contacting PG&E's contact center.

In 2019, during PG&E's 23 CWSP-focused open house events, customer literature and brochures about PSPS, emergency preparedness and planning, and Medical Baseline Program, were all available onsite in Braille, large-print, Spanish and Chinese. In addition, a recording of the 2019 CWSP presentation is available in American Sign Language (ASL) and continues to be available on the webinar page on pge.com.¹⁹

PG&E has expanded in-language support services through the promotion of a new, in-language tool for customer-facing employees to utilize in the field during customer interactions, such as door knocks to Medical Baseline customers during PSPS events. The Insight App helps bridge the communication gap by allowing employees to converse and interact with customers who do not speak English or are

¹⁹ https://players.brightcove.net/1688216792001/NyJ21yKYe_default/index.html?videoid=6144964790001

deaf or hard-of-hearing in the field by providing video and/or audio translation for customers. PG&E is evaluating additional benefits for deploying this tool to more employees and contractors to remove language barriers with our customers.

During 2019 PSPS events, PG&E contracted with a third party to provide ASL Interpreters during daily PSPS press conferences and record basic emergency preparedness messages that were posted on social media and PG&E's website. In 2020, PG&E will continue to provide ASL interpreters during any press conferences, as well as collateral in accessible formats and work to translate critical safety messages and videos into ASL, among other languages.

5 In-Event PSPS Customer Communications

PG&E describes its PSPS event communication plan in its 2020 Wildfire Mitigation Plan (Section 5.6.2.4 Customer, Agency, and External Communications in PG&E WMP), as well as in its Community Wildfire and PSPS Outreach Workplan (Advice Letter 4249-G/5827-E).

PG&E will continue to use all communication channels available during an event, including direct-to-customer notifications sent via phone, text and email, website, call center support, media engagement (multi-cultural news outlets, earned and paid media, social media), and collaboration with Public Safety Partners and CBOs. Using the multi-channel communication approach enables PG&E to notify and engage with potentially impacted public safety partners, critical facilities, Medical Baseline customers, all other customers, and the general public. Below describes the additional AFN-focused communications and support that is offered during PSPS events, and improvements PG&E developed since the 2019 PSPS season to optimize the AFN customer experience.

5.1 Notifications for Medical Baseline and Life Support Customers

PG&E provides additional notifications for customers enrolled in its Medical Baseline Program²⁰ due to potentially life-threatening implications that power outages may have on a customer who relies on either gas or electric service for life sustainability or mobility due to medical conditions.

As described in PG&E's 2020 Wildfire Mitigation Plan,²¹ throughout a PSPS event, PG&E sends automated notifications to Medical Baseline customers via phone, text and email. All notifications to Medical Baseline customers request a confirmation that the notification was received, and the notifications continue on an hourly basis until the customer verifies receipt of the notifications (e.g., by answering the phone, pressing any key to confirm receipt or opening their email). If a customer does not confirm receipt, PG&E will conduct door knocks to confirm the message is received in advance of de-energization. These extra notification steps are taken to ensure our medically sensitive customers are aware it is time to prepare and activate their emergency plan.

If, during the door knock site visit, it is determined that translation support is needed, PG&E

²⁰ Notifications also include Medical Baseline customers that are tenants of master metered accounts.

²¹ See PG&E 2020 WMP, pp. 5-304 – 5-305.

representatives can use Language Line Services to communicate with the customer by either utilizing the “Mobile Insight” app for video interpretation or by reaching an interpreter over the phone for assistance. If a customer is not home when the door knock visit takes place, a door hanger is left at the customer’s door to notify the customer that PG&E visited.

5.2 2020 Event Notification Improvements

PG&E has redesigned its customer notifications based on feedback from customer research and notification message testing (see Section 2.1) and feedback received by parties to the PSPS proceeding. In its notifications planned for 2020, PG&E will provide more information, sooner, and directly to customers.

Below are highlights to the changes made to the Medical Baseline-focused notifications:

- Providing links in the notifications to resources available for access and functional needs (AFN) populations, including Medical Baseline customers, which is also a key resource link on PG&E’s alert site;
- Giving Medical Baseline customer notifications with improved instructions and options to acknowledge notification receipt, to prevent the need for an in-person visit (“door knocks”); and
- Re-designing notifications to highlight critical information, including added street/address information, and estimated shutoff and restoration times from the initial contact. Providing this added information upfront is especially important for Medical Baseline customers to give them appropriate time to prepare and take action to make the necessary accommodations for PSPS-related outages.

5.3 Focused Efficiencies to Reduce Medical Baseline Door Knocks

In 2020, PG&E has made a significant effort to improve event notifications to Medical Baseline customers to ensure door knock resources are available for those who truly require an in-person notification and visit. Key changes toward this goal include:

- Revising Medical Baseline in-event notifications to lead with the request to verify receipt of message;
- Sending multiple rounds of direct mail to all Medical Baseline customers who required a door knock in 2019, and to those who have no and/or missing contact information (phone and email), encouraging them to update their contact information;
- Calling all 1,137 customers who required a door knock every time they were impacted by a PSPS event in 2019 (because they never verified receipt of the customer notifications). Representatives spoke to approximately 500 of these customers to educate them on the importance of acknowledging receipt of the message and confirmed contact information;
- Currently calling all 6,035 Medical Baseline customers who needed a truck roll at least once (but not every time like the group above) to validate contact information and educate them on the importance of acknowledging receipt of the message; and
- Improving customer contact data quality to maximize the opportunities for customers to be

notified prior to de-energization. As described in 2019 PSPS event reports, some customers were not notified directly by PG&E during the 2019 PSPS events, in part because some customers have no or invalid contact information in PG&E's files. To date, PG&E has reduced the total number of customers with no or invalid contact information by 75% (from approximately 68,000 to less than 17,000). Of this population, the number of Medical Baseline customers with no or invalid contact information was reduced by 90% (from approximately 800 customers to 80).

In addition to the effort to reduce the number of door knocks made during events to medical Baseline customers, PG&E has made significant efforts to improve the reporting and information sharing with authorized agencies during PSPS events. This includes improving the processes for sharing lists of Medical Baseline customers affected by a shutoff with their individual notification status and contact information. PG&E is working to further automate these processes, including providing mapped locations of medical baseline customers for cities, counties and tribes via the PSPS Portal.

5.4 Dedicated CBO Liaison During PSPS Events

PG&E recognizes the value for our customers in obtaining information from a trusted community partner. That is why PG&E has staffed a PSPS CBO Liaison to manage two-way communications with CBO partners during PSPS events. Partner CBOs will be invited to a once-daily Cooperator Call that shares PSPS event situational updates to key public safety partners. They will receive updates via email and have access to a dedicated email box during events. In addition, PG&E will refer our Medical Baseline customers to participating regional ILCs to coordinate the appropriate support through the Disability Disaster Access and Resources Program described in Section 3.1 during PSPS events.

5.5 Website

All customers need accurate and timely information in order to plan and prepare for PSPS events. PG&E recognizes that our website is a key communication channel to provide critical information. Following the PSPS-related outages in 2019, PG&E immediately upgraded its website resources to withstand higher levels of traffic during a PSPS event. PG&E describes the web-focused scalability and stability improvements in its bi-weekly Correction Action reports filed in compliance with the Assigned Commissioner's Ruling (ACR) issued January 30, 2020, in R.18-12-005 (Section 1). PG&E also describes the existing and planned translation approaches for its website in its CWSP Outreach Workplan (Section 4.1). In 2020, PG&E is continuing to make improvements to the website as follows:

- Moving pge.com into the cloud for improved scalability;
- The most-heavily used PSPS tools have been moved to a new standalone alert site. The alert site is a cloud-based website built specifically for emergencies that allows functions to scale up and down as needed; and
- The new cloud based alert site has been tested to accommodate 5 million page requests per hour, was designed with limited graphics and content to help pages to load quickly, has targeted load times to be complete within 4-7 seconds, has new layouts and functions to allow searching (vs. scrolling); and is currently available in seven languages, which will be expanded in 2020 in compliance with CPUC CWSP Phase 2 Decision (D. 20-03-004).

PG&E will continue stress-testing the website and PSPS features as the 2020 wildfire season approaches, including conducting tests before each PSPS event to ensure site accessibility and stability.

5.5.1 Website Accessibility

PG&E is committed to ensuring its website is accessible and usable for all customers. PG&E continues to develop processes and procedures, vetted by Level Access, to guide its teams toward providing content that complies with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA guidelines. These include processes for designers, web developers, and for the creation of accessible videos, PDFs, Excel spreadsheets, Word documents, PowerPoint presentations and emails.

PG&E continues to review and update, as needed, its policies for digital content, including websites, mobile applications, and other materials posted online, to ensure that its website content is accessible to customers with disabilities. As PG&E develops new content for www.pge.com and newly launched applications used by customers, PG&E tests for compliance with WCAG 2.0 Level AA standards and remediates, where possible, to ensure new products meet PG&E's standards. PG&E also ensures videos on www.pge.com comply with WCAG 2.0 Level AA requirements by having transcripts, closed captioning, and by making audio description available.

5.5.2 PSPS AFN Focused Website

In addition to the PSPS-related websites which are accessible and translated, PG&E also maintains a special resources web page²² for customers to highlight PSPS impact mitigation resources that are available during an event, including an overview of the services provided through PG&E's partnership with CFILC as described in Section 3.1, and a list of local ILCs to contact. The site also includes a video of an ASL interpreter that provides an overview of the resources available through local ILCs.

As described in Section 5.2, this website link is included in all PSPS event customer email and automated voice phone call notifications to ensure all customers are made aware of these resources during an event.

5.6 Other Forms of PSPS Event Notifications

PG&E is committed to ensuring all potentially impacted customers, and interested parties, are made aware of potential PSPS events, in order for these stakeholders to adequately prepare as needed. PG&E uses the forms of in-event communications listed below as well as those described above:

- **Media Engagement:** PG&E engages with the media, including multi-cultural news organizations, throwing press releases, augmenting paid advertising, issuing radio spot advertisements, conducting and live streaming news conferences with ASL translators, and participating in media interviews. In turn, these media organizations may provide communications on the radio,

²² www.pge.com/specialresources

broadcast, tv, and online;

- **Social Media:** PG&E uses social media, including Facebook, Twitter and NextDoor, to direct users to its website where they can access important emergency preparedness information, as well as PSPS event updates and resources (e.g., CRC locations);
- **PG&E Call Center Services:** PG&E operates four contact centers in the state of California and provides 24/7 emergency live agent service for customers to report emergencies and obtain PSPS-related updates, as needed. PG&E's call centers are equipped to provide translation support in over 250 languages (including 10 indigenous languages such as Mixteco, Zapoteco and Triqui). During a PSPS event, PG&E may implement the PSPS call strategy to ensure elevated service with minimal wait times for PSPS customers during a PSPS event;²³
- **Alerts for Non-PG&E Account Holders:** In 2019 PG&E launched the PSPS Zip Code Alerts, which is a service where anyone can sign up to receive direct notifications by specific or all zip codes from PG&E. Anyone can use PG&E's PSPS Zip Code Alerts including CBOs, tenants of a master meter, renters, and others. In 2020, PG&E is working to implement the option to sign up to receive notifications for up to five specific addresses. This allows customers to track certain locations, such as their children's school or place of work, which is similar to the functionality available in PG&E's address lookup tool on the website; and
- **Smart Phone SOS Alerts:** PG&E is actively engaging with Google to explore new technologies to notify visiting customers who are in the area that could be impacted by PSPS, yet may not be a customer of record who receive direct notifications from PG&E. This technology includes sending push alerts, called SOS Alerts,²⁴ to smart phones (both Androids and iOS devices) if the customer has the Google Search App and their location tracking activated on their device. PG&E is actively exploring this technology, which could include translations of useful phrases.

6 Conclusion

PG&E remains committed to ensuring that all our customers are aware of and prepared for potential power outages, including a PSPS-related outage. PG&E understands the hardships an extended outage can have on customers, especially the most vulnerable populations. PG&E strives to listen to its customers and communities, provide the needed support to these communities where possible, partnering with trusted community partners. We appreciate the opportunity to provide its initial plan and update on our progress.

²³ PG&E 2020 Wildfire Mitigation Plan (at p. 5-305): "During an event, PG&E will consider implementing the PSPS call strategy, as needed, to ensure elevated service with minimal wait times for customers potentially affected by an active PSPS event customers. The PSPS Call strategy includes maintaining full staffing across Contact Center Operations and training Credit and Billing representatives to be able to handle PSPS call types, and only accepting emergency-related calls (including calls related to downed wires, gas leaks, outages and PSPS) when notifications are sent to over 100,000 customers for an active PSPS event."

²⁴ For more information about Google SOS Alerts, visit crisisresponse.google/products/sos-alerts/.