



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

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Order Instituting Rulemaking to  
Examine Electric Utility De-  
energization of Power Lines in  
Dangerous Conditions.

Rulemaking 18-12-005

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ACCESS AND  
FUNCTIONAL NEEDS PLAN FOR PUBLIC SAFETY POWER SHUTOFF SUPPORT  
PURSUANT TO COMMISSION DECISION IN PHASE TWO OF R.18-12-005**

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Dated: **September 01, 2020**

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Southern California Edison Company (SCE) hereby submits this Quarterly Update to its Access and Functional Needs Plan for Public Safety Power Shutoff Support Pursuant to Commission Decision in Phase Two of R.18-12-005, attached hereto Attachment A.

Respectfully submitted,

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**Attachment A**



**Southern California Edison's Access and  
Functional Needs Quarterly Update for  
Public Safety Power Shutoff Support  
Pursuant to Commission Decision in  
Phase Two of R.18-12-005**

September 1, 2020

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## I. INTRODUCTION

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Pursuant to the California Public Utilities Commission’s (CPUC or Commission) Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk (Decision),<sup>1</sup> Southern California Edison Company (SCE) submitted its Access and Functional Needs Plan for Public Safety Power Shutoff (PSPS) Support on June 1<sup>st</sup>, 2020 (AFN Plan). The AFN Plan describes SCE’s efforts to address people with access and functional needs (AFN<sup>2</sup>) during PSPS de-energization events. This quarterly update supplements the AFN Plan to document the progress towards meeting the established plans and the impact of its efforts to address this population during de-energization events.

SCE performed an analysis<sup>3</sup> to identify the percentage of the SCE customer base that meets the definition of AFN in D.19-05-042 and found that approximately 80% of SCE’s total customer population would identify in at least one AFN category. While SCE’s efforts will encompass the entire AFN population with specific needs, SCE will provide more attention and resources to the most vulnerable. Each AFN category is assigned a vulnerability value from high to low which aids SCE in developing customer care plans for when PSPS de-energization events occur. These category values can be aggregated for those customers with multiple types of needs. SCE recognizes that customers who rely on life support devices are those most immediately vulnerable during PSPS de-energization events, but a customer with multiple simultaneous needs (*e.g.*, disabled, low-income, has medical equipment, and is limited English speaking) is also a high priority.

In addition, SCE will also incorporate into our efforts those customers above and beyond the medical baseline (MBL) population<sup>4</sup> for which it may already have available data<sup>5</sup>, such as: (1) households that self-identify to receive an in-person visit prior to disconnection for nonpayment, (2) receive utility communications in a non-standard format, or (3) self-identify as having a person with a disability in the household. The AFN Plan focuses on the range of AFN populations within

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<sup>1</sup> Decision (D.) 20-05-051, which was adopted by the Commission on May 28, 2020.

<sup>2</sup> AFN populations 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.” See D.19-05-052, pp. A6-A7.

<sup>3</sup> Analysis was performed in February of 2020

<sup>4</sup> The Medical Baseline Program provides an additional amount of electricity at the lowest rate (referred to as a “baseline”) to any customer who uses an electrically operated medical device in their home as authorized by their physician or physician designee. Note that the requirement for the device to be authorized by a physician has been suspended during the COVID-19 pandemic.

<sup>5</sup> SCE currently records contact information for households that self-identify as vulnerable, including those that identify for in-person visits prior to disconnection for nonpayment in the SCE Customer Service System

SCE's service territory and how SCE aims to support these customers. This quarterly report includes progress and updates to the AFN Plan submitted on June 1, 2020.



## II. EXTERNAL FEEDBACK

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### 1. CUSTOMER RESEARCH

#### **AFN Plan:**

SCE is committed to further understanding and responding to the needs of our AFN customers during PSPS events; therefore, we have partnered with trusted stakeholders such as community-based organizations (CBOs), independent living centers (ILCs), 2-1-1 Interface and other public agencies who represent the AFN population to better understand, conduct additional research and continue to learn about the needs of our AFN customers. Additionally, we plan to continue reaching out to customers directly for feedback through surveys and community outreach events.

#### **Quarterly Update:**

To better serve our customers, SCE continues to work with agencies that represent our AFN populations to help us understand the diverse needs of our customers, to develop appropriate engagements and outreach and to focus on co-creation of programs that are important and provide aid to all customers, with emphasis on our AFN customers. See “Consultation with Interested Parties and Advisory Councils” section below for updates and details.

Another mechanism for SCE to obtain feedback is through community meetings. Following each community meeting SCE hosts, attendees are invited to share their feedback via survey, particularly as it relates to awareness, preparedness and most importantly how their experience with a recent PSPS event impacted their lives. (Additional details in ongoing community meetings is provided in the section below.) Information obtained from these surveys is shaping SCE’s outreach and awareness campaigns around MBL. SCE has begun tracking enrollments and has set annual targets for increasing the populations enrolled in the program.

### 2. CUSTOMER FEEDBACK/SURVEYS

#### **AFN Plan:**

In early 2020, SCE conducted PSPS Surveys that assessed the effectiveness of our 2019 customer communications and community outreach efforts, including a wide range of wildfire-related topics. The surveys were conducted with about 2,000 residential and 700 business customers in both High Fire Risk Areas (HFRA) and non-HFRA areas in our service territory. Customers were given the option to take the surveys in English or Spanish. Additionally, SCE conducted monthly surveys—offered in English, Spanish, and additional languages—to monitor perceptions of SCE’s commitment to protect communities from the risks of wildfires and customer awareness of SCE’s PSPS program. AFN customers were included in these surveys, with approximately 25% of the responding customers indicating they have an individual in the home who has some sort of disability. In reviewing the survey data across the sample groups, there are no significant differences between the responses provided by those with disabilities in their household versus

those without.

**Quarterly Update:**

SCE is in the process of enhancing its PSPS Survey to capture customer feedback on SCE's performance during 2020 PPS events. Similar to the survey performed at the beginning of 2020, the upcoming PPS survey will target residential and business customers who were de-energized as a result of PPS activations. This survey will be sent at the end of 2020 wildfire season and the questions will be very similar to those included in the prior survey. Examples of questions in the survey include perceptions of SCE wildfire related activities, opinion of PPS practices, level of satisfaction with information in PPS notifications, source of PPS event awareness, etc.

SCE is also currently developing a more focused AFN research study that will aim to provide insights that will further influence and shape outreach and engagement activities, including building resiliency, for this population of customers. SCE is planning to launch this research study in the 4<sup>th</sup> quarter of 2020. In addition, SCE intends to begin engagements and focus groups with employees at the utility who identify as AFN or care for an individual in the AFN category to aid in integrating AFN consideration into the business more broadly. SCE believes that its employees are committed to improving our customer experience and want to include them in this effort.

### III. CONSULTATION WITH INTERESTED PARTIES AND ADVISORY COUNCILS

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#### **AFN Plan:**

SCE engages with diverse community stakeholders to inform and focus ongoing efforts to increase effective AFN outreach and awareness. SCE's Wildfire Mitigation Plan (WMP) outlined its strategy and objectives in reaching the all-encompassing definition of AFN within its territories from 2020-2022.<sup>6</sup> SCE supports existing relationships with CBOs throughout its territory and is working to expand those relationships with trusted agencies that support our AFN customers.

SCE engages with CBOs at both the state and local levels. In addition, SCE participates in weekly meetings with other Investor Owned Utilities (IOUs) and state agencies to provide real-time updates and share best practices and lessons learned on community outreach and engagement. On the local level, SCE continues to build on existing nonprofit relationships and build new partnerships with CBOs including faith-based and grassroots organizations in HFRA. SCE prioritizes participation in CBO collaboratives with diverse member organizations serving AFN populations. SCE regularly engages in meetings with the Inland Empire Disability Coalition, Inland Empire Concerned African American Churches, and California State Council on Developmental Disabilities' Safety Committee.

#### 1. SCE'S CONSUMER ADVISORY PANEL

#### **AFN Plan:**

SCE has regularly engaged and consulted with members of its Consumer Advisory Panel (CAP), which meets three times per year. The CAP includes diverse community stakeholders across SCE's service territory. Members are leaders in the nonprofit, community, and business sectors that represent various AFN and consumer groups including communities of color, veterans, disabled, LGBTQ, and low-income customers. For the past three years, CAP members have regularly been briefed on SCE's wildfire mitigation efforts and provided feedback that has helped shape SCE's customer service and outreach into these diverse communities. In 2019, SCE appointed two new CAP members who live and work in HFRAs, including an executive director of an ILC. Since the state's stay-at-home order has been in place, SCE has convened the CAP more frequently with virtual bi-monthly meetings planned through the end of 2020. PSPS and wildfire mitigation have been standing topics of discussion and consultation on all recent agendas. SCE will continue to consult and partner with CAP members who are eager to provide support in reaching AFN, in-language, and diverse communities. These activities will include the bi-monthly meetings, one-on-one engagements, and joint meetings/presentations with local stakeholders.

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<sup>6</sup> See SCE's 2020-2022 WMP, pp. 5-110 to 5-117.

## **Quarterly Update:**

SCE held its CAP meetings virtually on June 17 and August 14, 2020. Both meetings included detailed updates on wildfire mitigation efforts, census outreach, General Rate Case, and state legislation.

## **2. INDEPENDENT LIVING CENTERS**

### **AFN Plan:**

SCE established partnerships with eight ILCs across its service area to prepare AFN communities for PSPS. The ILCs are dedicated to increasing independence, access and equal opportunity for people with disabilities. Collectively, they provide direct services to the following counties within SCE's service area: Inyo, Kern, Los Angeles, Mono, Orange, Riverside, San Bernardino, Santa Barbara and Ventura Counties.

SCE's ILC partnerships will leverage the subject matter expertise of AFN advocates and members of the AFN community to provide appropriate, accessible and impactful education and outreach to SCE's AFN customers. Outreach will promote enrollment in SCE's MBL Program, which also offers SCE customers the ability to receive enhanced notifications for PSPS events and will include workshops and trainings to provide preparedness education and assistance in applying for the MBL Program. The planned AFN outreach activities will be closely monitored and adjusted as needed through regular meetings with individual ILCs, as well as larger meetings with all eight ILCs. Additionally, SCE begins engaging its ILCs and other CBOs when de-energization events are unfolding so that they can be prepared to aid their impacted populations based upon the areas of impact.

SCE convened the California Foundation for Independent Living Centers (CFILCs) members in our service territory in January and May and hosted them in February 2020 for a tour and presentation of our Emergency Operations Center (EOC). The meeting in May was transitioned to a virtual platform.

### **Quarterly Update:**

On July 29, 2020 SCE conducted a PSPS simulation exercise and invited the ILCs to participate as observers. This gave ILCs the opportunity to observe how PSPS events may unfold, how decisions are made and what customer care offerings would be available to customers if a real event were to occur. At the end of the exercise, SCE captured feedback from participants for continuous improvement purposes. One ILC member participated in this simulation exercise.

In August 2020, SCE convened the eight ILCs operating under the CFILCs umbrella for its quarterly update meeting. Due to COVID-19, SCE continues to successfully host these meetings virtually. This meeting focused on the following topics: ILC progress to goals, including MBL outreach, updates on enhanced MBL online application processes, new program launch for critical care customers, additional rebate programs and details around customer notifications during PSPS

events. SCE provided its CFILC with collateral on program offerings so that these important agencies can share information within their network of clients. SCE continues engagements with its broad network of CBOs and launched its CBO outreach strategy<sup>7</sup> in July 2020.

Additionally, SCE has added a dedicated AFN resource within its Incident Management Team (IMT) structure for when PSPS events are forecasted. This representative's key role in the IMT is to engage with CBOs, ILCs and other trusted agencies like 2-1-1 organizations when de-energization events are unfolding so that they can be prepared to aid their impacted populations based upon the areas of impact. SCE hosted a virtual webinar that provided training on PSPS alerts and notification processes in August 2020 to educate them on the notifications they would receive, the cadence of notifications, what the notifications will say and the call to action when received. Further, the notifications offer our trusted partners with prescribed messaging that they can repurpose for their own notifications to their clients and includes details of area of concern, dates for the periods of concern, maps of the impacted areas and helpful tips to share with customers. SCE is working closely with these partners on the early advance notifications for PSPS updates and makes the dedicated AFN resources available to them for questions while the events are in scope. SCE invited the ILCs, 2-1-1 partner organizations and the American Red Cross to this training session. Prior to conducting this training, SCE proactively began sending these notifications to the partners to gain feedback on their usefulness, which increased awareness and enabled their ability to proactively support their clients. SCE has communicated with our partners during all the PSPS events so far in 2020 and will continue working with these agencies to enhance communications so that they are meaningful to their needs.

### 3. 2-1-1 REFERRAL SERVICE

#### **AFN Plan:**

In 2019, SCE established partnerships with seven 2-1-1 service providers throughout the SCE service territory where customers can receive information suitable for their unique needs during PSPS events or other emergencies. 2-1-1 provides free information and referral services using rich data and access to live, trained specialists to connect people to services in their communities 24/7. As part of the partnership, 2-1-1 service providers will be assessing current capabilities and developing or augmenting their databases with AFN resources and referrals.

#### **Quarterly Update:**

On July 29, 2020, SCE performed a PSPS simulation exercise and invited 2-1-1 organizations in our service territory to participate as observers. This gave 2-1-1 organizations the opportunity to

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<sup>7</sup> CBO Outreach strategy aims to increase awareness and educate customers on rates and other programs utilizing a bottoms-up, grassroots approach by leveraging established relationships with nearly 1,400 CBOs within our service territory. See section titled "CBO Engagement/Community Partnerships" for details on how SCE leverages CBO strategy for AFN engagement and outreach.

observe how PSPS events may unfold, how decisions are made and what customer care offerings would be available to customers if a real event were to occur. At the end of the exercise, SCE captured feedback from participants for continuous improvement purposes. One 2-1-1 organization participated in the simulation exercise.

In August 2020, SCE convened a focus group meeting with the joint IOUs and the statewide 2-1-1 organizations to further understand how we can leverage our partnership to better serve our AFN customers. Topics of interest from SCE and its peer utilities was what type of resources and services are offered to aid AFN populations and whether those are consistent across the state. The objective to gain alignment of consistency with the 2-1-1 organizations and share best practices. This effort continues and SCE will dedicate resources necessary to amplify the value of our 2-1-1 partners, including better information and integration into front line staff about 2-1-1 organizations and customer referrals as needed.

#### 4. STATEWIDE AFN COUNCIL

##### **AFN Plan:**

SCE's mission is to safely and reliably deliver affordable clean energy to the customers and communities it serves. SCE is committed to understanding the unique and diverse needs of its AFN customer populations and has committed resources and funding to support the launch of the first Statewide AFN Advisory Council in partnership with the other California IOUs. As stated in the PSPS OIR Phase 1 decision, "the electric investor owned utilities must make a diligent effort to identify AFN populations within their customer base."<sup>8</sup>

SCE worked with the other IOUs to establish an external AFN Advisory Council, comprised of a diverse group of recognized CBO leaders supporting the AFN population as well as members and advocates from within the AFN community. SCE expects the Statewide AFN Council will serve as an appropriate foundation for successfully serving its AFN customers. The AFN Council opens the dialogue to discuss unique needs of this most vulnerable population and to develop a holistic strategy on how to better serve our AFN customers. The board of the AFN Council will be comprised of IOUs, state leaders (*e.g.*, Cal OES, CPUC), and statewide CBO leaders who support the AFN population.

The initial kick-off of this Advisory Council was held on June 15, 2020. The Statewide Advisory Council will aid all stakeholders in developing and executing upon meaningful strategies to serve AFN populations and provide independent expertise to help ensure that utility customer programs incorporate best practices. The Council will also help utilities and other stakeholders further develop their AFN strategies to ensure robust programs that will adequately and appropriately educate, communicate with, and aid AFN populations in building resiliency for de-energization events such as PSPS.

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<sup>8</sup> D.19-05-042, Appendix A, pp. A12.

## Quarterly Update:

SCE, along with the other IOUs, established a voluntary Statewide AFN Advisory Council comprised of a diverse group of CBOs supporting the AFN population, members and advocates from within the AFN community as well as representatives from various state agencies. The objective of the Statewide AFN Advisory Council is to help the IOUs learn and understand the unique needs of their most vulnerable customers. The IOUs plan to incorporate best practices to improve support of the AFN population now and in the future. Specifically, the AFN Advisory Council will: 1) actively identify issues, opportunities, and challenges; 2) serve as a sounding board and offer insights; 3) share experiences, perspectives, and best practices; 4) identify opportunities for partnerships; 5) help identify the needs of the various AFN constituents, and 6) amplify the message amongst the constituency they represent.

There are currently 20 organizations actively participating on the AFN Advisory Council including the California Office of Emergency Services (Cal OES), Disability Rights California (DRC), Center for Accessible Technology (CforAT) and CFILC.

In 2020, the Statewide AFN Council has held four meetings and has focused on the following topics:

- June 15, 2020: IOUs provided a recap of their 2019 efforts and a look ahead at the wildfire mitigation activities underway for 2020
- June 18, 2020: Listening session for the IOUs to hear a summary of needs from AFN Council members
- July 24, 2020: Resources for the utility frontline employees and AFN needs. A key outcome from this meeting was understanding the services, tools and resources provided by 2-1-1 organizations and how to integrate these services into front line resources responding to unique needs of our AFN populations
- August 14, 2020: Dedicated to hearing from 2-1-1 organizations to understand their current resources, tool and capabilities
- A key outcome of the meeting was for 2-1-1 organizations to come back to the Council with recommendations on an approach to establish a statewide plan as well as opportunities to fill the gaps specific to PSPS events

The AFN Advisory Council has meetings scheduled through the end of 2020.

Some examples of feedback received by the Council include:

- Providing generators and fuel for generators to AFN customers
- Ensuring strong partnerships are in place with local counties
- Considering customer accessibility needs in marketing and communications
- Providing clear communications about when a PSPS event will occur and how long it will last
- Providing resources to utility employees to support AFN customers during PSPS events
- Educating contact center support representatives to direct customers to 2-1-1

organizations for the identification of community specific resources during and after an emergency or PSPS event

- Considering how to create a more appropriate definition to target people with disabilities impacted by PSPS events beyond MBL customers

SCE will continue to integrate feedback from the council into its outreach, education and program development activities and is currently training front line employees such as contact center staff and Field Service Representatives (FSRs) on resources available to aid AFN populations, launching its Critical Care Back-up Battery (CCBB) program, amplifying partnerships with more than 1400 CBOs across its territory, building consistency across the state with 2-1-1 organizations, and utilizing the self-certification of vulnerable customers to ensure inclusion into alerts and notifications. Lastly, SCE has heard from the AFN Advisory Council how important it is to consider those who identify as AFN when developing programs that aid these populations best. SCE is currently building an internal framework to include its own employees who are AFN into the implementation of our AFN Plan.

## 5. CPUC DISADVANTAGED COMMUNITIES ADVISORY GROUP

### **AFN Plan:**

Senate Bill 350 (De Leon, 2015), as codified in Public Utilities Code section 400(g), requires the CPUC and the California Energy Commission (Energy Commission) to establish a Disadvantaged Communities Advisory Group (DACAG) consisting of representatives from disadvantaged communities. The purpose of the DACAG 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.

The Energy Commission and the CPUC adopted the Charter for the DACAG on December 13, 2017, in Energy Commission Resolution 17-13-2, and on December 14, 2017, in CPUC Resolution E-4893, respectively. The Charter was amended on March 11, 2020, in Energy Commission Resolution 20-0311-4. The DACAG meets monthly both virtually and in person in locations across the state.

Disadvantaged communities are areas throughout California that most suffer from a combination of economic, health and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, presence of hazardous wastes, as well as high incidence of asthma and heart disease.

Although living in a disadvantaged community does not necessarily mean that a person belongs to an AFN population, there is likely some overlap. In addition, disadvantaged communities in SCE's service area have some overlap within SCE's HFRA. SCE is committed to engaging with the DACAG, as well as the various other advisory councils and groups described in this Plan, to provide information about its wildfire mitigation activities. SCE also intends to inform the DACAG of its activities for outreach, education and resiliency building for its AFN populations.



## Quarterly Update:

The DACAG has expressed an interest in being informed of and providing input into SCE's activities for outreach, education and building resiliency for its AFN populations. SCE's Vice President of Customer Service Operations serves as a sponsor from SCE for the DACAG.

The DACAG defines disadvantaged communities that should be considered when developing these programs as<sup>9</sup>:

- The top 25% of census tracts identified by CalEPA's CalEnviroScreen model (these are traditionally defined as Disadvantaged Communities),
- Low-income census tracts below 80% of the State or Area Median Income (SMI/AMI),
- Individual households with median household income less than 80% of Area Median Income (AMI),
- All tribal lands.

SCE has conducted analysis using internal and external data, such as census data, to identify the overlaps within its HFRA of AFN, DAC and socioeconomic attributes to gain insights into our customer profiles across our service territory. This information can be used to help shape customer care programs and heighten the visibility of demographic impacts in our HFRA. The results of this information are still fresh and therefore SCE will continue work with this data to understand more in the upcoming months about the usefulness of this information and how it can be leveraged for outreach, education, program development and meaningful partnerships.

## 6. ENVIRONMENTAL AND SOCIAL JUSTICE (ESJ) COORDINATION FORUM

### AFN Plan:

SCE has created an internal, cross-functional ESJ Forum to support disparate impacts between communities; and proactively expand access to clean energy, resiliency resources and services in SCE's ESJ communities.

The ESJ Coordination Forum can help SCE enhance its AFN strategies by: (1) coordinating AFN and other ESJ activities and communications internally and externally; (2) providing input on new and ongoing ESJ policies, programs, and projects that could enhance AFN efforts, and (3) providing

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<sup>9</sup> The DACAG defines disadvantage communities in a similar manner as the equity framework that it would like to adopt. This framework would work in conjunction with the Guiding Principles of the Advisory Group set forth in the Charter of the DACAG. This framework includes topics of health and safety, access & education, financial benefits, economic development, and consumer protection as it relates to all climate related policies, bills, proceedings, requests for proposals, etc.  
[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/EquityFramework\\_GuidingPrinciples.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/EquityFramework_GuidingPrinciples.pdf)

recommendations to SCE management on important ESJ-related AFN issues.

The CPUC's 2019 ESJ Action Plan<sup>10</sup> defines an ESJ Community broadly as a community where residents are:

- Predominantly communities of color or low-income,
- Underrepresented in the policy setting or decision-making process,
- Subject to a disproportionate impact from one or more environmental hazards
- Likely to experience disparate implementation of environmental regulations and socio-economic investments in their communities.

The intent of this definition is to ensure that it is inclusive.<sup>11</sup> These communities are further defined using more traditional quantitative criteria that include but are not limited to the criteria identified by the DACAG in its Equity Framework (see above).

The ESJ Forum provides extraordinary value when taking the needs and concerns of ESJ communities into consideration as we proceed with our AFN outreach efforts. Naturally there is overlap between the ESJ and AFN populations and, therefore, SCE will leverage these efforts as it advances its AFN Plan.

#### **Quarterly Update:**

SCE teams working on AFN activities meet regularly with the Environmental and Social Justice (ESJ) team at SCE to discuss important topics, share information and improve opportunities for our AFN customers where possible. Information sharing between these teams is crucial to ensuring awareness of activities, particularly where there may be opportunities to leverage work underway.

## **7. REGIONAL WORKING GROUPS AND ADVISORY BOARD**

### **AFN Plan:**

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<sup>10</sup> CPUC's 2019 ESJ Action Plan, pp. 9

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan\\_%202019-02-21.docx.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf)

<sup>11</sup> "Environmental and social justice seeks to come to terms with, and remedy, a history of unfair treatment of communities, predominantly communities of people of color and/ or low-income residents. These communities have been subjected to disproportionate impacts from one or more environmental hazards, socio-economic burdens, or both. Residents have been excluded in policy setting or decision-making processes and have lacked protections and benefits afforded to other communities by the implementation of environmental and other regulations, such as those enacted to control polluting activities." CPUC's 2019 ESJ Action Plan, pp. 6

SCE is actively engaging with organizations and agencies today that serve individuals identified as AFN customers to gain insights to the unique and diverse needs of this population of customers. SCE's AFN Plan includes organizing Regional working groups and an Advisory Board that will further serve to enhance its overall AFN strategy. As described in this Plan, SCE has numerous engagements with working groups and an Advisory Board and is currently evaluating the structures and charters of those forums to identify gaps while coordinating efforts to meet the spirit of the Decision.

**Quarterly Update:**

SCE is in the process of developing regional working groups to represent the various communities impacted by PSPS within SCE's service territory. These working groups will serve as a formal venue to share lessons learned between impacted communities and SCE. The working groups will discuss several key topics related to PSPS including Community Resource Centers (CRCs), communication and notification strategies, and efforts to identify critical facilities and AFN customers.

The working groups will include representatives from various entities such as Public Safety Partners, local and tribal governments, people and communities with access and functional needs and other vulnerable communities. SCE will invite representatives from the following groups to join the working groups:

- Small multi-jurisdictional electric utilities
- Community choice aggregators
- Publicly owned electric utilities
- Communications and water service providers
- Tribal and local government entities
- Public Safety Partners
- Representatives of people/communities with AFN and other vulnerable communities
- Commission staff

There will be three regional working groups in the SCE service area. The working groups will meet quarterly, and SCE will provide a report to the Commission on key issues discussed during the meetings. Meeting agenda, minutes and outcomes will also be shared with the PSPS Advisory Board.

In addition to the regional working groups, SCE is also in the process of establishing a PSPS Advisory Board that will discuss area-wide de-energization and wildfire issues and provide hands-on, direct involvement and advisory functions on various aspects of PSPS de-energizations. The Advisory Board will have senior-level representation from the various entities invited to attend. Advisory Board efforts will be coordinated with the working group activities. SCE will have representation from the following groups in the Advisory Board:

- Public Safety Partners
- Communications and water service providers

- Tribal and local government entities
- Business groups
- Nonprofit organizations
- Representatives of people/communities with AFN and other vulnerable communities
- Academic organizations

The working groups and the PSPS Advisory Board will have representation from people/communities with AFN and other vulnerable populations. In the working group meetings, we will review how local government, SCE and the AFN community can partner to improve outreach to impacted communities before and during PSPS events. The meetings for working groups and Advisory Board are expected to begin meeting in late September 2020.

## IV. CUSTOMER PROGRAMS AND AVAILABLE RESOURCES FOR VULNERABLE POPULATIONS

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### 1. CRITICAL CARE BATTERY BACK-UP (CCBB) PROGRAM

#### **AFN Plan:**

In 2020, SCE is implementing its CCBB Program that will aid SCE's most vulnerable customers during PSPS de-energization events. The purpose of the program is to provide a fully subsidized portable backup battery solution to eligible customers in SCE's service territory, which will aim to provide sufficient power to operate eligible customer medical devices for up to twenty-four hours in the event of any de-energization. Customers that are Income Qualified Critical Care (IQCC)<sup>12</sup> in HFRA Tiers 2 and 3 will be eligible for this program.

SCE's CCBB will:

- Promote clean portable electric back-up battery solutions and reduce reliance on fossil fuel generators,
- Appropriately size batteries based on load consumption analysis conducted during customer assessment,
- Fully subsidize a solution for all eligible customers, and
- Provide a simple customer experience with no upfront costs that is modeled around SCE's Direct Install program<sup>13</sup>.

SCE is beginning outreach to eligible customers and plans to deliver approximately 2,500 batteries to eligible customers in 2020. SCE described this program in its 2020-2022 WMP and its pending 2021 GRC application (A.19-08-013).

#### **Quarterly Update:**

- Launched CCBB Program on July 7, 2020.
- Based on analysis of eligible customer's accounts and the medical devices in the home, SCE established a baseline for load requirements to determine variable battery solutions to

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<sup>12</sup> IQCC customers are those that are enrolled in both an income-qualified program such as California Alternate Rates for Energy or Family Electric Rate Assistance and Critical Care.

<sup>13</sup> Direct installation energy efficiency programs are those in which simple energy saving low-cost measures are installed in low-income households. Potential measures include compact fluorescent light bulbs, low-flow showerheads and faucet aerators, water heater wraps refrigerators. The Critical Care Back-up Battery Program is considered direct install measure.

offer in the program. The goal was to right size the battery solution that would be able to provide enough power to operate a customer's medical device(s) for up to 24 hours on a single charge. The subsidized battery also includes a solar panel for charging

- SCE developed a battery sizing tool that our contractors will use as a guide for estimating battery size recommendations to ensure right sizing.
- Program includes a three-year extended warranty for customers.
- In July, SCE mailed outreach letters to all customers meeting the eligibility criteria for this program (approximately 2,141 customers) inviting them to participate in this new program. SCE will continue to send outreach letters to new customers who meet eligibility criteria each month.
- Despite being eligible for the program, at no cost, some customers may choose not to participate in the program. SCE will be conducting a sampling of calls to those who have declined the battery to gain insights to their lack of interest. This will help identify areas for program improvement and provide information on whether customers are already equipped with backup power.
- The CCBB program prioritized outreach by first contacting eligible customers who were impacted by a PSPS event in 2019 to inform them about the program and invite them to participate.
- To date (August 28, 2020), the program has enrolled 251 customers and has delivered 88 backup batteries to eligible customers, with delivery dates for additional customers being scheduled each week. Due to COVID-19, assessments and delivery have been offered through a virtual business model with ESA contractors if requested.
- Due to COVID-19, supply chain impacts were anticipated as production of devices was overseas. SCE has a committed procurement and delivery schedule for the 2500 batteries, supply and will be able to receive and distribute these to eligible and interested customers as planned in 2020.

## 2. MEDICAL BASELINE

### **AFN Plan:**

SCE encourages customers who require the use of electrically operated medical equipment to sign up for the MBL program. SCE conducts outreach to raise customer awareness about this program using the following outreach strategy:

- Quarterly bill inserts directing customers to [www.sce.com/medicalbaseline](http://www.sce.com/medicalbaseline), [www.sce.com/psp](http://www.sce.com/psp) and [www.sce.com/wildfire](http://www.sce.com/wildfire),
- Conversations with customer service representatives in SCE's contact center or in person at community events,
- Information provided at CRC and Community Crew Vehicles (CCV) during PSPS de-energization events,
- Partnerships with CBOs and other agencies to raise awareness of and increase enrollment in the program.

SCE recently made significant enhancements to its MBL Program to aid customers by allowing customers to enroll through an online process (while continuing to accept paper applications). Additionally, in response to the COVID-19 pandemic, SCE temporarily suspended all MBL re-verifications to ensure that customers are not removed from the program because they are unable to visit their physicians during the “safer at home” orders. SCE also temporarily relaxed the requirement of providing a physician’s signature to initially enroll in the program during the pendency of these orders.

SCE’s MBL Program provides customers an additional amount of electricity at the lowest rate (referred to as a “baseline”). In addition, this program provides more tailored customer care, for instance by allowing customers to list other individuals to receive important alerts and notifications about their electric account through multiple contact methods, which may be crucial during de-energization events or emergencies. For those identified as relying on medical equipment for life support, SCE takes additional measures to confirm these customers receive the outbound alerts and notifications for PSPS events, including sending a representative to their door to deliver the message, if necessary.

SCE works directly with local offices of emergency services to share information about its most vulnerable customers so that they are aware of the customers in their communities that may require assistance during PSPS events.

**Quarterly Update:**

SCE has seen an increase in MBL enrollment in 2020 as it compares to the 2018 and 2019 monthly averages.

Year	Total End of Year MBL Customers	% Difference from Previous Year
2018	99,132	
2019	95,912	-3.2%
2020 YTD*	101,113	5.4%

\*YTD is as of 8/8/2020

Another view of 2020 month by month enrollments shows sizeable response and increase in enrollments in the MBL program.

2020	Jan	Feb	Mar	Apr	May	Jun	July	Aug YTD*
Total MBL Customers	95,936	96,219	96,739	97,321	98,875	100,079	101,169	101,113

\*YTD is as of 8/8/2020

### 3. SELF-GENERATION INCENTIVE PROGRAM (SGIP)

#### AFN Plan:

SCE is committed to promoting clean energy solutions that expand the growth of distributed generation in disadvantaged communities and increase customer resiliency in HFRA. To support this goal, the statewide SGIP has been modernized with targeted incentives for resiliency related to wildfires and for low-income customers. The program provides financial incentives for the installation of energy storage to meet all or a portion of the electric energy needs of a home or business.

The purpose of the SGIP is to reduce greenhouse gas emissions, demand, and customer electricity purchases, increase electric system reliability through improved transmission and distribution system utilization, as well as create market transformation for distributed energy resource technologies.

The SGIP Equity Resiliency Incentive program offers incentives for resiliency options to vulnerable customers with limited income. SCE launched these new incentives to its customers and has already fully subscribed its first budget allotment but received additional budget as described below.

#### Quarterly Update:

In late July 2020, SCE conducted a residential customer letter campaign to approximately 5,000 well-water customers living in HFRA to take advantage of the SGIP Equity Resiliency incentive. To further raise awareness about the SGIP incentives, SCE created an enhanced webpage at [www.sce.com/sgip](http://www.sce.com/sgip) that provides information about SGIP, including FAQs and other helpful resources about the program. SCE has also taken steps to raise awareness of the SGIP Equity Resiliency opportunity through presentations with CBOs, ILCs, and other agencies within its service territory.

As of today, the SGIP Equity Resiliency incentive initial budget allocation is \$34 million, which accounted for more than 300 customers (both residential and business). In July, SCE received an additional \$176 million for the “Equity Resiliency” category and has already allocated ~\$53 million of this amount; At this point in time, ~\$157 million is still available for both residential and business customers.



The table provided below reflects the interest and subscription of the SGIP Equity Resiliency budget allotment to date.

Equity Resiliency Budget	Total Applications	Sum of Requested Incentive (\$)	Sum of Rated Capacity [KW]
Commercial	10	\$2,839,103	789.00
Multifamily	6	\$2,537,471	830.00
Single Family	631	\$21,530,979	6,608.93
State or Local Government	14	\$26,376,507	7,754.00
<b>Grand Total</b>	<b>661</b>	<b>\$53,284,060</b>	<b>15,991</b>

#### 4. SINGLE-FAMILY AFFORDABLE SOLAR HOMES (SASH) [NEW]

The SASH program is structured to provide qualifying single-family homeowners with access to solar technology while also providing green jobs training, employment, and community engagement opportunities. The program was enacted by CA Assembly Bill 2723, which directed that a minimum of 10% of California Solar Initiative funds be set aside for programs assisting low-income households in IOU service territories. Originally scheduled to finish in 2015, the SASH program has been extended to 2021. The SASH funds enabled communities that have been historically left out of the renewable energy market to become integral partners in building a sustainable solar industry. Objectives of the SASH program are to:

- Create broad community engagement for solar generation in low-income affordable housing.
- Provide education for low-income homeowners on the benefits of energy efficiency and solar technologies.
- Enroll and refer qualifying families to providers of energy efficiency services.
- Enable low-income families to access money-saving solar technologies by providing up-front incentives.
- Provide opportunities for community volunteers to participate and for public-private partnerships supporting low-income communities to develop.
- Support local green-jobs training and workforce development programs by enabling job trainees to participate in solar electric system installations.

Applications completed from program inception to June 30<sup>th</sup>, 2020: **3,692**

Incentives paid from program inception to June 30, 2020: **\$55,678,437**

## 5. SCE PROGRAMS SERVE LOW-INCOME CUSTOMERS

### **AFN Plan:**

SCE promotes relevant programs that serve AFN customers in advance of PSPS events to support preparedness, cost savings and resiliency. SCE understands that some of our customers may be experiencing COVID-19-related financial hardship due to quarantine, illness, caring for loved ones or business closures. These income-qualifying customers can apply for assistance to pay their electric bill.

### ***Energy Assistance Fund (EAF)***

EAF is designed to provide a one-time assistance to SCE customers facing financial hardship.

### ***Income Qualified Programs: CARE and FERA***

SCE provides income-qualifying households discounted rates on their electric bill. The CARE program provides qualifying customers a discount of about 30 percent and FERA provides a discount of 18 percent on the monthly bill.

## **Quarterly Update:**

### ***Energy Assistance Fund (EAF)***

The program has been providing an additional supplement, once every rolling year, of up to \$100 for customers impacted by COVID-19. In addition, SCE recently implemented the Captcha software that allows for electronic signatures to simply and accelerate the application process, like enhancements with the MBL application to streamline the customer experience and make program enrollments easier for customers.

### ***Income Qualified Programs: CARE and FERA***

SCE has seen an increase in CARE enrollments compared to last year. For the months of June and July 2020, SCE has enrolled 76,885 new customers on CARE. This represents an 87% increase over June and July 2019 (41,021 new CARE enrollments).

Likewise, FERA enrollments have also increased. In June and July 2020, SCE has enrolled 2,148 new customers on FERA in 2020. This represents a 104% increase over a corresponding period of June and July 2019 (1,051 new FERA enrollments).

In response to the COVID-19 pandemic, SCE has suspended the requirement to verify CARE/FERA applications until April 2021, when these consumer protections sunset.

## V. IN-EVENT CUSTOMER CARE PLANS [NEW]

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SCE continuously monitors weather forecasts as well as other key fire threat indicators, such as vegetation moisture content, to anticipate the potential need for PSPS events. In the event where SCE anticipates a potential de-energization due to extreme weather and other high fire threat conditions, SCE utilizes a PSPS IMT to manage and coordinate potential responses. The PSPS IMT is a fully dedicated team trained in PSPS event management following Incident Command System (ICS) standards and procedures. It contains a specialized Customer Care Team for customer care during PSPS events.

The Customer Care Team has a dedicated AFN specialist who is responsible for addressing some of the needs of the diverse AFN population. This team staffs and deploys Community Resource Centers and Community Crew Vehicles as described below to minimize impacts of PSPS to our customers. Additionally, this team sends advance notifications as events unfold to community partners, such as ILCs, 2-1-1 organizations, and the American Red Cross.

### 1. CUSTOMER CARE INCIDENT MANAGEMENT TEAM ACTIVATION AND TOOLS [NEW]

SCE's Customer Care Team plays a key role during a PSPS IMT activation including assessing potentially affected areas, reviewing potentially affected customers, prioritizing and optimizing available resources.

The team monitors circuit segmentation and customer data to provide informed recommendations on customer care resource deployment. One of the tools used by this team is the Customer Care Dashboard, which shows customer data, including AFN designations<sup>14</sup>, and available resources in affected circuits. This critical information is used to prioritize customer care resource allocations, especially when multiple circuits are affected. Some of the information that is used to prioritize recommendations on customer care resource allocations are: the total number of customers potentially affected by the event, households with AFN needs, critical infrastructure and available resources.

Given that resources may be limited when multiple circuits are affected, the team use GIS data to optimize locations for CRC activation or CCV deployment. This enables the team to have a visual on the potentially affected locations and allows us to make better decisions on where to recommend deployment. In some cases, more than one circuit may benefit from deployed CRC/CCV.

The AFN specialist on the Customer Care Team monitors notification confirmation to our Critical Care customers and provides advance notifications to community partners as events unfold. Additionally, the AFN specialist is available throughout the event to answer any questions or

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<sup>14</sup> In addition to medical baseline and critical care data stored in the Customer Service System, SCE has identified some of the AFN dimensions through a third party (Acxiom)

address concerns.

The dedicated IMT has participated in seven PSPS simulation exercises to practice and capture lessons learned so that we can be better prepared for when actual PSPS activation occurs.

## 2. COMMUNITY RESOURCE CENTERS (CRCs) & COMMUNITY CREW VEHICLES (CCVs) [FROM AFN PLAN: CUSTOMER PROGRAMS AND AVAILABLE RESOURCES]

### **AFN Plan:**

During PSPS events, SCE establishes CRCs at third-party facilities, offering services including PSPS information, device charging, information, Wi-Fi or cellular service, water, light snacks, ice or ice vouchers, a sitting area, and access to restrooms. CRCs and CCVs have three-pronged extension cords that enable charging of most home medical equipment. Some CRCs may also have refrigeration for temporary storage of medication. In response to the COVID-19 pandemic, some features may not always be available as SCE tailors its CRCs to comply with state and local social distancing requirements. In addition to CRCs, SCE deploys CCVs equipped with backup power so that customers can charge their personal mobile devices and continue to receive information/updates from SCE about the outage, listen for relevant public safety broadcasts, and connect with friends and family concerned with their well-being during PSPS events. Customers may also update their contact information and enroll in outage alerts at CRCs and CCVs.

CRCs and CCVs are not specifically targeted to AFN populations, but they are vital resources for these customers, as well as SCE's overall customer population during PSPS de-energizations.

### **Quarterly Update:**

To date, SCE has contracted with 47 CRCs. All 47 contracted CRCs meet Americans with Disabilities Act (ADA) requirements and six of these CRCs are ILCs. This enables SCE to leverage the pre-established relationships that these ILCs have with the community and their expertise in addressing diverse AFN needs. SCE continues to work with local governments and communities to increase site coverage as well as the operating hours to meet CPUC requirements.

For some of the more rural or remote CRCs where comparable services may not be available nearby, SCE is preparing to proactively perform panel upgrades and/or transfer switch installations so that these sites can accommodate backup generation. In the case of a PSPS event where one of these CRCs may be subject to de-energization, SCE may deploy mobile diesel generators to ensure the availability of power, goods and services.

This year, SCE has activated CCVs in Bishop, Mammoth and Antelope Valley during PSPS events. Due to COVID-19 precautions all services in 2020 have been provided through a CCV. In one instance, the CCV was in the CRC parking lot. These CCVs were tailored to meet state and local social distances requirements. Examples of modifications include layout and availability of chairs and tables, requirements for masks, and sanitation procedures. We serviced our customers outside via a drive-thru setup, space permitting, or an outside tent and distributing pre-packaged

resiliency kits in lieu of allowing customers to directly help themselves to specific resources. Customer resiliency kits contain preparedness information including the MBL application, Personal Protective Equipment (PPE), bottled water, pre-charged phone charger, and light snacks.

### 3. COOLING CENTERS [NEW]

The cooling center program runs from June 1 through October 15 each year. Cooling centers provide an air-conditioned space for residents to use during a heat wave. The county and city cooling center facilities are all operating with COVID-19 safety protocols in place. SCE is currently exploring the possibility of contracting some of these cooling centers as CRCs when PSPS events unfold.

SCE provides the county cooling center administrators with handheld battery fans to distribute to cooling center attendees on very hot days.

### 4. RESILIENCY ZONES [FROM AFN PLAN CUSTOMER PROGRAMS AND AVAILABLE RESOURCES]

#### **AFN Plan:**

SCE established the Resiliency Zones pilot to energize limited essential services in rural communities. SCE is targeting seven rural communities (Tehachapi, Acton, Agua Dulce, Idyllwild, Bridgeport/Lee Vining, Mammoth, Cabazon), and up to three sites per community, including the installation of a transfer switch to accommodate temporary backup generation dispatched during the PSPS period of concern. SCE is targeting site readiness by third quarter of 2020.

#### **Quarterly Update:**

SCE has held meetings with community leaders from the following counties: Mono, Inyo, Los Angeles, Riverside and Kern to discuss Resiliency Zones. As a result of these discussions, we have identified three sites in Agua Dulce, two sites in Cabazon and one site in Idyllwild for a total of six sites to establish as potential Resiliency Zones. SCE has obtained signed agreements from four of the sites' business owners.

SCE has also contracted with three electrical contractors to perform the work required to prepare the site to receive the generator during PSPS events.

SCE is on track for site readiness by end of third quarter 2020 for the four sites and will continue to meet with community leaders, and consider options, in its efforts to expand the program throughout the year.

## VI. CUSTOMER PREPAREDNESS OUTREACH & COMMUNITY ENGAGEMENT

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### 1. ADVERTISING CAMPAIGN EDUCATING CUSTOMERS ABOUT PREPARING FOR POWER SHUTOFFS

#### **AFN Plan:**

The 2020 PSPS campaign continues SCE's effort to educate all SCE customers, particularly in HFRA, about PSPS, alert sign-up, emergency preparation (including for those who use a life-saving device or other medical equipment) and SCE's wildfire mitigation work. The campaign is currently being conducted in six languages (English, Spanish, Chinese, Korean, Vietnamese and Tagalog) and will expand to additional languages (Khmer, French, Russian, Japanese, Arabic, German, Farsi, Punjabi and Armenian) by year end.

#### **Quarterly Update:**

The 2020 PSPS mitigation advertisements and the PSPS alert sign-up advertisements started running in May, the PSPS preparedness ads in June and the PSPS awareness ads in August. By end of July, we had 476 million paid impressions across all channels, including digital display, digital video, SEM, social, radio and connected TV. About 64% of the ads were targeted to multicultural audiences. 127 million impressions were in-language (Spanish, Chinese, Korean, Vietnamese, Tagalog).

### 2. LETTERS ABOUT POTENTIAL POWER SHUTOFFS PLANNED FOR ALL CUSTOMERS IN SERVICE TERRITORY

#### **AFN Plan:**

The 2020 Dear Neighbor newsletters (HFRA and non-HFRA) focusing on PSPS and wildfire mitigation were mailed to all customers starting at the end of May through early June 2020. The letter focuses on PSPS, including our notification process and decision-making factors for PSPS. The non-HFRA newsletter focuses on emergency preparedness and includes an overview of PSPS. Both versions provide an update on our wildfire mitigation efforts, helpful emergency preparedness websites and ways to sign up for alerts. A list of SCE customer service contact numbers and PSPS website (in-language versions, where available) was provided in English, Spanish, Chinese, Korean, Vietnamese, Cambodian, Tagalog, Arabic, Armenian, Farsi, French, German, Japanese, Punjabi and Russian. These letters are sent to SCE customers, including AFN customers.

### 3. ON-GOING COMMUNITY MEETINGS HELD IN HIGH FIRE RISK AREAS

#### **AFN Plan:**

Since 2018, SCE has hosted more than 35 community meetings in areas that could be impacted by PSPS and is continuing to hold such meetings in 2020. SCE invites every customer within HFRA to learn about PSPS, what to expect before, during and after events, and to interact with

agencies that support resiliency planning. Additionally, SCE customer service representatives are available to update contact preferences (this service was not available for the on-line meetings held in response to COVID-19-related restrictions on in-person meetings) and explain how customers can update contact information on SCE's website. The 2020 on-line community meetings use the Skype Meeting Broadcast platform and offer closed captioning in six languages (English, Spanish, Chinese, Vietnamese, Korean, and Tagalog). Recorded versions of the meetings are posted to SCE's YouTube channel, which provides the ability to view closed captioning in multiple different languages, including languages that are prevalent in SCE's service territory. SCE also provided American Sign Language (ASL) translation for hearing-impaired customers at the in-person community meetings. SCE added ASL translations to the recorded 2020 on-line community meetings.

#### **Quarterly Update:**

In June 2020, SCE held five community meetings, which were all conducted online due to COVID-19 shelter-in-place orders.<sup>15</sup>

## **4. MEETINGS WITH CITIES, COUNTIES AND TRIBAL GOVERNMENTS**

#### **AFN Plan:**

In 2020, SCE will continue to regularly engage with local government officials, tribal staff and first responders to educate stakeholders on SCE's 2020-2022 WMP and its potential impact on their communities. These meetings will focus on educating local and tribal governments about the PSPS de-energization process and how the company will communicate and work with government agencies and emergency operations during outages. SCE will solicit advice on outreach to the AFN population in meetings with County Operational Areas.

#### **Quarterly Update:**

SCE provided an update of its WMP and PSPS activities to all local and tribal governments in high fire risk fire areas in early May 2020, which included information to share with MBL and Critical Care customers about customer care programs and resources in their jurisdictions. SCE is also conducting meetings with local and tribal governments to inform them about the PSPS de-energization process and how SCE will communicate and work with government agencies and emergency operations during PSPS events. SCE will solicit advice on outreach to the AFN population in meetings with County Operational Areas.

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<sup>15</sup> Recorded versions of the 2020 on-line community meetings are available at [www.sce.com/wildfiresafetymeetings](http://www.sce.com/wildfiresafetymeetings)



## 5. CBO ENGAGEMENT/COMMUNITY PARTNERSHIPS

### **AFN Plan:**

In 2019, SCE formed, and enhanced, partnerships with trusted and reputable organizations that work directly with AFN customers. SCE is partnering with Mixteco/Indigena Community Organizing Project to coordinate direct outreach to community members and to deliver PSPS public service announcements in the indigenous languages of Mixteco, Zapoteco and Purepecha. SCE is also partnering with 2-1-1 service providers and ILCs throughout the service territory, as noted above.

### **Quarterly Update**

To create productive alliances with key CBOs, particularly those that reach critical customer segments like seniors, low-income, disabled, multi-cultural and AFN, SCE launched a pay-for-performance program in 2019 and contacted 30 CBOs for ongoing incentivized partnerships. In the program, SCE would pay an incentive of up to \$5,000 in quarterly disbursements to selected CBO's through year-end 2020 and throughout 2021.

This model has now been duplicated to further engage our CBO partners to help educate and create awareness around safety preparedness in the event of a disaster that impacts SCE customers. To date, a Request for Proposal (RFP) was issued to solicit proposals to help SCE conduct outreach and communications to the customer segments previously mentioned. The RFP encouraged CBOs to submit a proposal to be eligible to receive an incentive of up to \$5,000 to be paid out in quarterly disbursements through year-end 2020 and throughout 2021. These proposals will provide SCE with general information about the CBOs, basic demographics of their constituents, their ability to reach customers with in-language dependencies, their preliminary plans for outreach, and the tools and methods they have in place to measure this work. SCE will review the proposals and select CBOs that are best suited to achieve the program's objective to reach AFN communities and customers with in-language dependencies. See below for key milestones.

- RFP issued (7/13/2020)
- RFP response due (8/7/2020)
- CBO proposal review (8/28/2020)
- CBO award notification (Expected early September)
- CBOs begin community outreach and education efforts (Expected Q3 2020)

Once all CBOs have been identified, they will each be given agreements to review and execute. These agreements will lay out the program expectations and deliverables.

## VII. IN-EVENT PSPS CUSTOMER COMMUNICATIONS

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### 1. EVENT NOTIFICATIONS

#### **AFN Plan:**

As documented in the 2020 WMP, SCE understands its stakeholders have different needs and require varying methods of alerting and warning to ensure proper notification. For example, first responders, Public Safety Partners, and local governments require as much lead time as practical to begin contacting constituents and preparing to respond to potential de-energization. To support this need, SCE when possible provides advanced notification to these agencies upon activation of its EOC, typically three days before a potential PSPS event. Update notifications are made daily to coordinate with these agencies. SCE when possible begins initial alerting and warning messaging to remaining customers up to two days before a potential PSPS event.

SCE has a comprehensive plan for communicating with its customers during emergencies, including during non-PSPS outages, which includes a schedule of notifications for repair (unplanned) outages and maintenance (planned) outages. Automated outbound notifications are sent to customers via the customer's preferred method of contact (including email, phone call and text message) when an outage occurs, as outage restoration times are determined or shifted, and upon conclusion of the outage. For maintenance outages, SCE provides advanced notice to customers at least three days prior to the outage, but usually up to two weeks prior. SCE provides an automated reminder a day ahead of the scheduled outage and SCE's Outage Map on SCE.com provides customers with outage information in their service location.

In late 2019, SCE implemented zip code-level alerting for PSPS events. Zip code alerting enables non-SCE accountholder populations to enroll to receive PSPS notifications based on their preferred zip code(s) within the SCE service area. In 2020, SCE will further enhance zip code-level alerting to include in-language notifications in alignment with its existing notification abilities for SCE customers. Furthermore, SCE is in discussions with technology partners to use public alert messaging to notify anyone in an area affected by a PSPS event without previously signing up for alerts on SCE.com. This capability is like "Amber Alerts" and leverages the Common Alerting Protocol technology.

#### **Quarterly Update:**

- SCE provides priority notification when possible to first responders, Public Safety Partners, and local governments upon activation of its EOC, typically three days before a potential PSPS event. SCE is working on adding the ILCs, 2-1-1 organizations, and the American Red Cross into this automatic advance notification system.
- SCE provided training on these PSPS notifications in August 2020 with the above-mentioned AFN partners and SCE will continue to expand this capability to additional CBOs as appropriate.

- SCE has made significant progress on enabling public alerts to be used for PSPS events. SCE is targeting a small-scale deployment this fire season, potentially notifying the public upon de-energization due to a PSPS event on a few selected circuits for this pilot.
- In July 2020, SCE enhanced zip code-level alerting to include in-language notifications in alignment with its existing notifications abilities for SCE customers.

## 2. MEDICAL BASELINE NOTIFICATIONS AND IN-PERSON NOTIFICATIONS FOR LIFE SUPPORT CUSTOMERS

### **AFN Plan:**

Customers who are enrolled in SCE’s MBL program and whose physician has indicated that medical equipment is used for life support purposes (*i.e.*, customer cannot be without life support equipment for at least two hours) are identified upon enrollment as Critical Care customers. Critical Care customers receive additional contacts prior to disconnection or interruptions of service. When a public safety event is forecasted, SCE takes additional measures to provide these customers with alerts and notifications, including using in-person notifications, if necessary.

SCE also monitors sent and undelivered PSPS notifications. When SCE is unable to confirm that a Critical Care customer has received PSPS notifications, SCE attempts to contact them directly. In those circumstances where SCE is unable to contact those Critical Care customers, SCE will attempt to deliver an in-person notification.

### **Quarterly Update:**

SCE can enroll MBL customers behind a master meter to receive alerts and notifications regarding PSPS events. SCE is currently working on enrolling all MBL-enrolled customers in these situations to receiving these important communications. SCE expects to have these enrollments complete by Sept 2020. Processes have been modified to include procedures for those processing MBL applications going forward on how to enroll customers. This will improve notice for this population that initially could only enroll to receive alerts and notifications at a zip code level.

In 2020 to date, SCE has been successful in notifying all enrolled Critical Care customers when PSPS events are forecast.

## 3. SOCIAL MEDIA

### **AFN Plan:**

#### **Facebook and Twitter**

SCE uses social media to provide PSPS communication updates, such as locations of deployed CCVs and activated CRCs.

## **Nextdoor Application**

SCE uses Nextdoor as an additional platform to communicate with its customers in targeted neighborhoods during a PSPS event. Only customers who are registered on the Nextdoor App for their specific neighborhood would see the communication.

### **Quarterly Update:**

SCE utilized its social media platforms to raise awareness of PSPS events in 2020 and to provide information about resources, such as the location and deployment of our CCVs in Inyo County and Bishop during the May 2020 PSPS event. In June 2020, we posted to Facebook and Twitter the deployment of our CCV to Bishop and Mammoth Lakes. We also posted this information to Nextdoor, targeting the circuits that were on the list for potential de-energization. Going forward, we will be posting these notices in English and Spanish.

## **4. NOTIFICATION EFFECTIVENESS**

### **AFN Plan:**

In 2019, SCE conducted after-action reviews with impacted emergency management agencies to solicit feedback on its PSPS process, including SCE's notification and outreach efforts. SCE intends to continue and enhance these meetings in 2020. In addition to the after-action review meetings, SCE held routine calls with county emergency management agencies to coordinate planning and response efforts, including discussion of how SCE notifies and engages customer groups. SCE also solicited feedback from its critical infrastructure partners regarding its PSPS communications in workshops. In addition, during the larger PSPS events in 2019, SCE coordinated with the California Utilities Emergency Association to conduct daily operational briefings with critical infrastructure providers, where they could discuss the effectiveness of SCE's communications.

SCE conducted post-wildfire season surveys with both residential and business customers from December 2019 to March 2020, which included demographics questions about customers with disabilities and medical equipment need.

### **Quarterly Update:**

SCE intends to perform a similar survey to capture lessons learned from the 2020 wildfire season. See Customer Feedback/Surveys section above for additional details.

## **5. WEBSITE**

### **AFN Plan:**

On SCE's website (SCE.com), customers can find content about SCE's wildfire mitigation efforts, learn tips for how to become more resilient during major events and receive up-to-date information regarding PSPS in their area. Radio, digital banners/videos and social media

advertisements also drive visitors to SCE.com for more information. SCE also maintains a toll-free (1-800) phone line staffed with trained personnel from SCE's customer operations who receive calls from impacted customers as a priority.

SCE.com is WCAG 2.0 AA compliant. We have designed and tested the site to support visitors who use a wide range of assistive technology to access the internet, including screen readers, and have optimized our maps to support visitors with color blindness. We have also translated our website into five languages: Spanish, Korean, Chinese, Vietnamese, and Tagalog.

**Quarterly Update:**

SCE's main wildfire safety landing page, [sce.com/wildfire](https://sce.com/wildfire), was updated for easier access and navigation. This page includes content related to wildfire and PSPS, including customer care programs.

## 6. CUSTOMER CONTACT CENTER SUPPORT

**AFN Plan:**

SCE Customer Service Energy Advisors are trained and available to answer customer calls as PSPS events unfold. These representatives support our customers during PSPS events by answering questions, providing resource information, resolving concerns, addressing emergency issues, and escalating potential issues that arise as needed.

**Quarterly Update:**

- SCE has a team of trained Energy Advisors to provide in-person support for CRCs and CCVs when activated.
- SCE has developed and rostered a Customer Contact Center (CCC) PSPS Liaison role for when a PSPS IMT is activated, to ensure clear and concise PSPS-related communications are provided to Energy Advisors and key stakeholders in a timely manner.
- CCC Support team has streamlined and maintains a consistent line of communication with Business Resiliency business partners regarding PSPS.
- CCC Support refresher training was performed from June 11 to July 17 of 2020. This refresher training is performed twice a year and the topic of PSPS is a standing subject. In addition to the annual refresh training, SCE continuously seeks out ways to improve communication and training related to PSPS and servicing our customers.