

BEFORE THE PUBLIC UTILITIES COMMISSION OF
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Order Instituting Rulemaking to
Examine Electric Utility De-
Energization of Power Lines in
Dangerous Conditions.

**CENTER FOR ACCESSIBLE TECHNOLOGY'S COMMENTS ON PACIFIC GAS &
ELECTRIC'S DE-ENERGIZATION POST-EVENT REPORT REGARDING DE-
ENERGIZATION EVENT ON SEPTEMBER 28-OCTOBER 1, 2024**

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I. INTRODUCTION

In accordance with the series of decisions issued in this proceeding, Center for Accessible Technology (CforAT) submits these comments on PG&E’s Post-Event Report for the potential de-energization event that took place on September 28-October 1, 2024.¹ The Report was filed in this docket on October 15, 2024. This was PG&E’s fourth event of the 2024 wildfire season; CforAT refers to the event as PG&E 24-4 and the Report as the PG&E 24-4 Event Report.² These comments on the PG&E 24-4 Event Report are timely filed.

II. DISCUSSION

On September 27, 2024, PG&E identified potential fire weather conditions in forecast models and notified its Emergency Operations Center (EOC) Commander.³ PG&E’s EOC activated on September 28, 2024 and began issuing notifications to Public Safety Partners.⁴ Later that day PG&E refined the scope of the event based on forecasts, issued notifications to Public Safety Partners and customers in at-risk areas, and began preparing customer support resources.⁵ Over the course of PG&E 24-4, PG&E monitored weather conditions across 17 Time Places, including areas of Humboldt, Trinity, Shasta, Tehama, Glenn, Butte, Colusa, Yolo, Napa, Sonoma, Contra Costa, Alameda, San Luis Obispo, and Santa Barbara Counties.⁶ On September

¹ CforAT uses the term “de-energization event” broadly to refer to any event for which PSPS protocols are activated and a post-event report is submitted. CforAT refers to the first day of this event as beginning when PG&E activated its EOC for a de-energization event. PG&E 24-4 Event Report at p. 2.

² CforAT proposed this naming convention in 2023 and used it in response to post-event reports filed by all of the large IOUs in order to avoid confusion when different parties refer to the events based on different naming conventions or dates (e.g. the date when an incident management team was activated, the date that power was shut off, or the date that the report was filed). CforAT continues to recommend that this convention be adopted by the Commission and that parties be directed to use it for consistency.

³ PG&E 24-4 Event Report at p. 2.

⁴ PG&E 24-4 Event Report at p. 2.

⁵ PG&E 24-4 Event Report at p. 2.

⁶ PG&E 24-4 Event Report at pp. 2-3.

30, 2024, PG&E began de-energizing certain assets and customers.⁷ PG&E provided notice to 14,098 customers regarding potential de-energization, and the utility ultimately de-energized 9,176 customers across 5 counties: Shasta, Glenn, Colusa, Butte, and Tehama Counties.⁸

CforAT has filed comments on each of PG&E's prior Event Reports from the 2024 wildfire season in which we have set forth our ongoing general concerns about the IOUs' execution of power shutoffs and made recommendations for improvements.⁹ In these comments, we continue to focus on issues with the utility's notification process as well as the decision-making process, CRCs, reported customer complaints and claims, and partnerships providing support to AFN customers.

A. Notifications

In Section 5.5 of its post-event report, PG&E addresses notification failures that occurred during this event.¹⁰ First, PG&E states that 52 customers did not receive any notifications due to missing contact information and unilaterally decides to deviate from reporting template and exclude these notification failures from Table 8.¹¹ In Table 8, PG&E reports a total of 973 notification failures, including missed notifications that affected 47 MBL customers who were not notified at de-energization initiation and 45 MBL customers who were not notified immediately before re-energization.¹² Explanations for these notification failures include data errors, incorrect mapping and categorization on the utility's data platform, and vendor error as a

⁷ PG&E 24-4 Event Report at p. 2.

⁸ PG&E 24-4 Event Report at pp. 3, 5.

⁹ CforAT Comments on PG&E 24-1 Event Report, filed July 2, 2024; CforAT Comments on PG&E 24-2 Event Report, filed August 5, 2024; CforAT Comments on PG&E 24-3 Event Report, filed August 19, 2024.

¹⁰ PG&E 24-4 Event Report at pp. 46-50.

¹¹ PG&E 24-4 Event Report at p. 46.

¹² See PG&E 24-4 Event Report at pp. 47-48.

result of a network disruption.¹³ PG&E states that it has corrected or is in the process of correcting the issues, including issuing postcards seeking updated contact information, correcting errors and refining processes, and working with the vendor on a system for delivering notifications when system interruptions occur.¹⁴

For this event, PG&E also reports that it issued 358 false communications, including 9 non-critical facility customers who were falsely notified of de-energization and 8 critical facilities and 341 customers (including 2 MBL customers) who were de-energized for an EPSS outage but incorrectly informed it was a PSPS outage.¹⁵ PG&E attributes these false communications to various data issues and errors.¹⁶ While PG&E states that the error responsible for issuing PSPS-specific notifications during an EPSS outage has been fixed, it does not provide any information about whether the other issues have been corrected or any plans to prevent similar errors from occurring in the future.¹⁷

Earlier in the PG&E 24-4 Event Report, PG&E notes that 169 of the 14,098 customers notified of potential de-energization did not receive a cancellation notice and are not included in the 9,176 customers de-energized.¹⁸ However PG&E only reports one missed cancellation within Table 8 and identifies within Section 5.7 that 9 customers were falsely notified of de-energization that did not occur (and ostensibly did not receive any cancellation notices).¹⁹ As it is not clear which customers make up the count of 169 who did not receive a cancellation, CforAT requests that PG&E be directed to clearly identify all of the missed cancellation

¹³ PG&E 24-4 Event Report at pp. 47-50.

¹⁴ PG&E 24-4 Event Report at pp. 46, 51, 77-78.

¹⁵ PG&E 24-4 Event Report at pp. 51-52.

¹⁶ PG&E 24-4 Event Report at pp. 51-52.

¹⁷ PG&E 24-4 Event Report at pp. 51-52.

¹⁸ PG&E 24-4 Event Report at p. 5 note 4.

¹⁹ See PG&E 24-4 Event Report at pp. 47-48, 51.

notifications and to include all notification failures within Table 8 (as discussed in more detail below).

CforAT's has consistently emphasized the importance of accurate and timely notifications before, during, and after de-energization events;²⁰ Customers, especially those with disabilities and medical needs, need timely updates about the status of a power shutoff to inform whether they should expend limited resources on necessary preparations for an upcoming event or stop making such expenditures if the event has been cancelled. The costs and consequences of de-energization (or potential de-energization) are exacerbated when notification failures compromise the ability of customers to respond appropriately to the drastic and endangering event of losing power.

Given the importance of timely and accurate notifications, CforAT emphasizes the need to detect and resolve all notification issues as soon as possible. CforAT continues to have concerns that issues such as mapping errors were not identified during the pre-season and that other undetected issues may lead to repeated notification failures. As errors and various system issues have now occurred during multiple events,²¹ CforAT continues to be concerned that notification issues will recur and intensify during future events. The information that PG&E provides regarding underlying causes and its remediation plans remain fairly general. It is difficult to determine how issues are or are not related and whether PG&E is conducting adequate work to prevent recurrence in future events. CforAT again requests that PG&E be

²⁰ While this was an issue for all the IOUs, in 2023 it was a particular concern for SCE, whose customers suffered from severe and repeated notification failures. *See, e.g.*, CforAT Comments on 2023 Large IOUs' Post-Season Reports, filed March 21, 2024, at pp. 4-17.

²¹ PG&E 24-1 Event Report, filed July 18, 2024, at pp. 42-44. During PG&E 24-1, PG&E experienced a substantial number of notification issues, attributed to mapping errors and issues with internal processes and data systems, as well as unknown root causes that PG&E is still investigating. PG&E 24-3 Event Report, filed August 2, 2024, at pp. 41-43. Data errors also caused notification failures during PG&E 24-3.

directed to provide a detailed action plan and timeline on its efforts to detect and remediate all notification issues, and that the Commission issue a clear statement to all of the IOUs that they should not let identified failures linger through an entire wildfire season.

In addition, PG&E does not provide any explanation for omitting the notification failures caused by lack of contact information from Table 8, which is intended to provide a comprehensive breakdown of all notification failures. This does not comply with the post-event reporting template and does not provide an accurate overall picture of all notification failures that PG&E experienced during PG&E 24-4. This is not the first time that PG&E has deviated from the post-event template to minimize its notification failures. We raised this same concern about PG&E excluding some notification failures from Table 8 in our comments on the PG&E 24-3 Event Report.²² Additionally, in 2023, PG&E characterized some missed notifications as “delayed,” rather than “notification failures,” even though a notification sent outside the Commission’s required timelines is, by definition, a notification failure.²³ CforAT requests that the Commission direct PG&E to resubmit the report including all missed notifications in Table 8 and to adhere to the template in all future post-event reports.

B. Decision-Making Process

CforAT’s concerns about PG&E’s decision-making process remain consistent with those previously identified and discussed in comments regarding both the 2023 and the 2024 wildfire seasons.²⁴ While IOUs are required to weigh the risks and costs of a power shutoff against the potential public safety benefits of reducing the risk of wildfire, CforAT has consistently maintained that the IOUs, including but not limited to PG&E, have not sufficiently quantified

²² CforAT Comments on PG&E 24-3 Event Report at pp. 2, 4.

²³ Cal Advocates Comments on PG&E 23-1 Event Report, filed October 2, 2023, at pp. 7-8.

²⁴ *See, e.g.*, CforAT Comments on 2023 Large IOUs’ Post-Season Reports at pp. 18-23; CforAT Comments on PG&E 2024 Pre-Season Report at pp. 1-2.

and considered the risks and costs of power shutoffs in their decision-making process.²⁵ The limited analysis afforded to the risks and costs of de-energization contrasts starkly with the sophisticated methods of data collection and analysis that the IOUs have devoted to considering wildfire risk.

CforAT appreciates the IOUs' efforts and advancements in weather forecasting and improving the understanding of wildfire risk. With these advancements, the IOUs can more precisely target areas of wildfire risk and reduce the overall number of customers included in the scope of power shutoffs. These improvements are meaningful, but they do not eliminate the risks and harms of power shutoffs. While the ability to execute more surgical de-energization events results in fewer members of the overall public experiencing the impacts of these events, it does not reduce the impacts felt by the customers who are affected, particularly those who are subjected to multiple power shutoffs. Therefore, it is necessary for the IOUs to devote comparable efforts and improvements to analyzing and understanding the impacts and harms from de-energization events. Without a thoroughly considered analysis of the harms associated with power shutoffs, IOUs cannot adequately assess the overall impact of a de-energization event, and the detailed analysis on the side of considering wildfire risk is likely to overwhelm the limited analysis on the side of harm stemming from an outage.

PG&E's consideration of risks and costs stemming from de-energization is limited to the calculation of potential PSPS risk via the "California IOUs Multi-Attribute Value Function (MAVF) framework," that PG&E utilizes in its "PSPS Risk-Benefit Tool."²⁶ While circuit-specific information is used to calculate safety, financial, and reliability impacts that are

²⁵ See, e.g., CforAT Comments on 2023 Large IOUs' Post-Season Reports, filed March 21, 2024, at pp. 18-23.

²⁶ PG&E 24-4 Event Report at pp. 17-18.

incorporated into an overall risk score, the inputs for quantifying risk estimates for de-energization remain fairly general in nature.²⁷ Because of this, they likely do not capture the multi-faceted potential harms of power shutoffs to consumers, especially to the most vulnerable individuals who depend on power for health and safety.

PG&E uses a “Critical Customer Adjustment Factor,” which incorporates “[t]he type of customer (ex. MBL program, etc.) . . . to reflect a higher risk score for customers who are at greater adverse risk of a potential de-energization event,” but does not explain why this factor is applied only to the calculation of reliability and financial consequences and not safety consequence, considering that vulnerable customers are susceptible to heightened safety impacts as well.²⁸ Therefore, while this analysis may attempt to consider some of the harms of de-energization on vulnerable populations, it likely underestimates and fails to capture the full extent of the harms, including safety impacts for customers who need dependable service for their health and safety. Overall, the level of analysis afforded to the risk of power shutoffs continues to be much less sophisticated than the level of analysis of the risk of wildfire ignition.

In a footnote, PG&E states that assumptions used for these calculations may be updated and acknowledges that other “more precise values of resiliency or cost of PSPS metrics” may be developed in other proceedings.²⁹ The IOUs, including PG&E, have not reported on any meaningful refinements or advancements to the analysis of harms from de-energization in this proceeding, though the IOUs have continued to develop ever-more sophisticated data collection

²⁷ PG&E 24-4 Event Report at pp. 19-20.

²⁸ PG&E 24-4 Event Report at pp. 19-20. As we noted in comments on the SCE 24-1 Event Report, SCE’s risk calculation applies an AFN/NRCI multiplier to enhance only the safety component and not the reliability and financial components. CforAT Comments on SCE 24-1 Event Report at pp. 10-12. CforAT is not aware of why these calculations differ among IOUs and why the factors representing increased risk for vulnerable customers are not applied across all components for which the vulnerable customers will experience increased risk.

²⁹ PG&E 24-4 Event Report at p. 19 note 10.

and analysis for determining wildfire risk. CforAT requests that the Commission consider coordinating any efforts in other proceedings to quantify and analyze impacts of de-energization with this proceeding. As the IOUs continue to rely on de-energization as a wildfire mitigation tool for the foreseeable future, the need to fully understand and balance the harms to customers remains urgent.

CforAT has repeatedly recommended that the Commission refer to the Resiliency proceeding (R.19-09-009) and specifically the use of the ReNCAT tool under development in that proceeding, to consider potential analytical techniques for evaluating harms associated with loss of power.³⁰ CforAT continues to recommend that the Commission direct the IOUs to consider the use of the ReNCAT tool as well as other improved analytical techniques for evaluating the risks and harms of power shutoffs, in order to make much-needed advancements on this side of the decision-making process. CforAT also recommends that each IOU be directed to review and analyze complaints from each event and to survey customers on harms they experience to help improve the balancing analysis.³¹

C. Community Resource Centers

In Section 9 of its post-event report, PG&E states that it opened 11 CRCs (four indoor locations and 7 outdoor locations), which were visited by a total of 464 people.³² In Appendix F, PG&E provides the list of CRCs deployed, including one in Butte County, one in Colusa County, two in Glenn County, one in Napa County, three in Shasta County, two in Tehama County, and one in Trinity County.³³ Resources provided at these locations included charging for medical

³⁰ See, e.g., CforAT Comments on Large IOUs' 2023 PSPS Post-Season Reports at pp. 22-23.

³¹ In the section below addressing Community Resource Centers, CforAT recommends collecting more information from customers who make use of the resources on offer. This information would also be useful in developing an improved understanding of customer risks and harms when the power is shut off.

³² PG&E 24-4 Event Report at pp. 68-69.

³³ PG&E 24-4 Event Report, Appendix F at pp. 116-17.

devices and electronics, snacks, water, and “Grab and Go” bags.³⁴ For this event, PG&E states that onsite visitors requested and received 524 snacks, 461 bottled waters, 442 device chargers, 115 bags of ice, and 74 blankets, and 451 visitors received “Grab and Go” bags instead of remaining onsite.³⁵

PG&E states that for this event the average travel distance to CRCs, based on 11 survey respondents, was two miles.³⁶ With this low response rate and the limited data provided about CRCs, it remains difficult to assess whether customers in scope for this event were adequately supported by CRC deployment. Previously, CforAT has noted our concerns about whether PG&E is providing adequate engagement and support to local governments requesting customer support resources during de-energization events.³⁷ We continue to recommend that the IOUs provide more information regarding their CRC deployment decision-making, to allow for stakeholders to evaluate their mitigation efforts.

CforAT continues to recommend that the IOUs should be directed to collect information regarding CRC usage which could help in understanding how and why community members are visiting CRCs during potential or actual de-energization events.³⁸ This should include a requirement for the IOUs to identify the items and vouchers visitors take, whether visitors stay onsite or take “Grab and Go” bags. PG&E has provided some of this information, which CforAT appreciates. CforAT believes it would also be appropriate for the IOUs including PG&E to report what information or resources customers who visit CRCs request, and whether CRC staff successfully connected them with requested resources and services like transportation

³⁴ PG&E 24-4 Event Report at p. 68.

³⁵ PG&E 24-4 Event Report at p. 68.

³⁶ PG&E 24-4 Event Report at p. 69.

³⁷ CforAT Comments on PG&E 24-3 at pp. 8-9.

³⁸ *See, e.g.*, CforAT Comments on PG&E 24-2 Event Report at pp. 5-6.

or hotel stays. More detailed reports about CRC usage would provide helpful information about the harms experienced, or the issues that were the focus of customers' concern, during potential or actual de-energization events. This information, in turn, would help the IOUs and the Commission better understand customer needs to improve mitigation service and options during future events.

CforAT also notes that most of CRCs deployed were outdoor locations and reiterates our position that indoor CRC locations are generally preferable to CCVs and outdoor CRC locations and should be prioritized because they can offer better temperature control and seating during events which often coincide with high wind and heat conditions. Access to temperature-controlled indoor locations during outages is especially important for the health and safety of sensitive individuals. The IOUs should carefully consider these factors when deploying CRCs and CCVs. More data collection about customer needs and experiences at CRCs and CCVs would also assist the IOUs in determining how and where CCVs and outdoor CRCs can operate effectively and supplement indoor CRC locations during times of extreme weather.

D. Reported Customer Complaints and Claims

After shutting off power, IOUs are required to report all complaints, "meaning any expression of grief, pain, or dissatisfaction, formally filed court claims, and informally or formally filed Commission complaints received as a result of the PSPS event."³⁹ As CforAT has repeatedly discussed in this proceeding, the information that the IOUs provide regarding complaints and claims is limited, making it difficult to evaluate the adequacy of their mitigation and customer support efforts and to understand customer experiences during events.⁴⁰ This continues to be the case with PG&E in 2024.

³⁹ D.21-06-014 at p. 304.

⁴⁰ See, e.g., CforAT Comments on Large IOUs' 2023 PSPS Post-Season Reports at pp. 23-26.

In Section 7 of the PG&E 24-4 Event Report, PG&E reports a total of 71 complaints, falling within five broad categories.⁴¹ The largest number, 35 complaints, is assigned to the category of “General PSPS Dissatisfaction/Other,” covering “complaints about being without power during PSPS event and related hardships such as food loss, income loss, inability to work/attend school, plus any PSPS-related complaints that do not fall into any other category.”⁴² The next largest number of complaints, 18, is reported in the category of “PSPS Frequency/Duration.”⁴³ PG&E reports an additional 16 complaints in “Communications/Notifications,” 1 complaint in “Safety/Health Concern,” and 1 complaint in “Outreach/Assistance.”⁴⁴ Beyond the number of complaints received in each category, no further information is provided here. In a footnote, PG&E states that its reporting follows the Commission’s post-event report template and that, “[a]dditional information regarding complaints and claims will be provided in the PSPS Post-Season Report.”⁴⁵

PG&E 24-4 Event Report also states that the utility has received 3 claims for this event: 1 described as “Business Interruption/Economic Loss,” 1 described as “Food Loss Only,” and 1 described as “Property Damage.”⁴⁶ No further information is provided about these claims.

CforAT has recommended in prior comments on post-event and post-season reports that the Commission should require the IOUs to provide more detailed information about complaints and claims. We understand that the IOUs include more data on customer complaints in their post-season reports; however, as we discussed in comments on the 2023 post-season reports, we continue to believe that more specific and detailed information, including resolutions and actions

⁴¹ PG&E 24-4 Event Report at p. 64.

⁴² PG&E 24-4 Event Report at p. 64.

⁴³ PG&E 24-4 Event Report at p. 64.

⁴⁴ PG&E 24-4 Event Report at p. 64.

⁴⁵ PG&E 24-4 Event Report at p. 64 note 59.

⁴⁶ PG&E 24-4 Event Report at p. 65.

taken by the utilities, would allow for a deeper post-event analysis of the harms experienced by customers and of the utility's efforts to support customers.⁴⁷ For example, instead of the current broad categories, the IOUs could record complaints in more specific categories (i.e. "food loss" instead of "General PSPS Dissatisfaction/Other") that would provide a better sense of frequent issues. Additionally, the IOUs could provide more detailed information about the concerns raised in each of the complaints received, as well as details about the customer support offered and if a resolution was found. For the formal claims, the IOUs could provide brief descriptions and the dollar amounts at issue. As discussed regarding decision-making, the understanding and analysis of harms from power shutoffs needs greater attention and refinement, and direct feedback from customers should be meaningfully considered in shaping this understanding and responding with appropriate mitigations. CforAT again requests that the IOUs be directed to include more comprehensive information on complaints and claims received from customers. The IOUs should also be directed to include feedback from public safety partners or local governments expressing concern about a de-energization event.

E. Partnerships Providing Support to AFN Customers

In Section 6.5 of its post-event report, PG&E addresses its engagement with the AFN community, including the DDAR Program, implemented in collaboration with CFILC.⁴⁸ The PG&E 24-4 Event Report states that through DDAR, 8 ILCs provided aid to 426 customers who rely on power for medical or independent living needs.⁴⁹ In addition, PG&E states that, "575 batteries were previously distributed in affected counties."⁵⁰ However, PG&E does not provide any specific information about how the 426 referenced customers were assisted or how they were

⁴⁷ CforAT Comments on Large IOUs' 2023 PPS Post-Season Reports at pp. 23-26.

⁴⁸ PG&E 24-4 Event Report at pp. 57-58.

⁴⁹ PG&E 24-4 Event Report at p. 57.

⁵⁰ PG&E 24-4 Event Report at p. 57.

connected with the DDAR Program, nor does it provide any more detailed information about battery delivery through the DDAR program. As stated in its previous 2024 post-event reports, PG&E states that, “[it] is evaluating intervenor comments on how the ILCs aided customers reliant on power . . . [and] regarding engagement with customers and battery delivery requests through DDAR and will update the 2024 AFN Plan accordingly.”⁵¹

PG&E also mentions other support resources for AFN customers, including its Portable Battery Program (PBP), Food Bank Partnerships, Meals on Wheels Partnerships, 211 Referral Services, and Accessible Transportation Partnerships.⁵² PG&E provides some event-specific information about these partnerships, including the names of food bank partners and Meals on Wheels organizations that the utility worked with during PG&E 24-4.⁵³ While PG&E states that the 211 Referral Services worked with the utility to assist 61 customers with resources during this event, no further information is provided regarding what kinds of assistance was requested or received.⁵⁴ Overall, for each of the support programs referenced, the information provided continues to be limited and fairly general, without much or any specific data on how many customers were aware of these resources, requested assistance, or received assistance.

CforAT has repeatedly stated our position that DDAR can provide valuable services, including important forms of resources and assistance during power shutoffs, for those customers who are aware of it and able to access it.⁵⁵ As previously noted, however, the scale of the program is limited, and no information has ever been provided regarding options to increase the scale of support available to AFN customers during de-energization events. In addition, the post-

⁵¹ PG&E 24-4 Event Report at p. 57.

⁵² PG&E 24-4 Event Report at p. 58.

⁵³ PG&E 24-4 Event Report at p. 58.

⁵⁴ PG&E 24-4 Event Report at p. 58.

⁵⁵ *See, e.g.*, CforAT Comments on PG&E 23-4 Event Report, filed January 17, 2024, at pp. 8-10.

event reports include minimal information about how the program engages with and assists customers, instead providing only a count of the number of customers who were aided. CforAT appreciates that PG&E plans to update its 2024 AFN Plan based on intervenor comments, but requests that PG&E also be directed to include more substantive information in its post-event reports to allow stakeholders to review and comment on this program (as well as other customer support programs) following de-energization events. In addition, CforAT continues to recommend ongoing work, in conjunction with stakeholders rather than through private negotiations, to evaluate options for further development of this program so that it can operate at scale during future power shutoffs.

As previously discussed, CforAT believes that more work should be done to ensure that customers are aware of support resources and that these resources can be offered at scale for future power shutoffs. As we discussed in our comments on PG&E's 2023 Post-Season Report, the results from the 2023 education and outreach survey show relatively low customer awareness of support resources, contrasted with high interest in these resources.⁵⁶ These results suggest that customers would benefit from greater information and access to these resources. For this reason, CforAT again recommends that PG&E be directed to engage in enhanced education and outreach regarding support resources that are available before, during, and after power shutoffs.

As CforAT has recommended increased and more transparent data collection for CRCs and customer complaints, we again recommend that PG&E be directed to track engagement with AFN customers through its partnerships and provide this data in post-event reports. More information, such as how many customers were assisted through a partnership program and what

⁵⁶ CforAT Comments on Large IOUs' 2023 PSPS Post-Season Reports at pp. 29-31. PG&E's 2023 pre-season results showed that, at most, 46 percent of respondents were aware of a given resource. PG&E Post-Season Report, Appendix A, filed March 1, 2024, at p. 4.

resources were requested and provided, would help the IOUs and the Commission understand the harms experienced by AFN customers during power shutoffs and how they can best be mitigated.

III. CONCLUSION

CforAT appreciates the opportunity to provide comments on the IOUs' execution of de-energization events. We continue to focus on the importance of timely notifications, as well as on the ongoing need to develop and refine the decision-making process of PG&E and the other IOUs. With our recommendations here and prior filings in this docket, CforAT hopes to advance this process further and improve the ability of all IOUs in considering and supporting public safety broadly during times of extreme weather conditions.

Respectfully submitted,
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