

**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.

**2026 ANNUAL ACCESS AND FUNCTIONAL NEEDS PLAN
OF PACIFICORP (U 901 E)**

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Dated: February 2, 2026

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PacifiCorp d/b/a Pacific Power (PacifiCorp or company) submits its plan to address access and functional needs (AFN) customers and communities during a de-energization event, attached as Attachment A. The Company has made efforts to align this plan with the joint investor-owned utility working group AFN Plan template, as appropriate. This plan is submitted consistent with Decision (D.) 21-06-034 issued June 24, 2021, Decision Adopting Phase 3 Revised and Additional Guidelines and Rules for Public Safety Power Shutoffs (Proactive De-Energizations) of Electric Facilities to Mitigate Wildfire Risk caused by utility infrastructure, specifically Appendix A to the Phase 3 Decision (Appendix A), Section K, Reporting.

Dated: February 2, 2026

Respectfully submitted,

/s/

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Attachment A

PacifiCorp

2026 Annual Plan to Support Populations with Access and Functional Needs During Public Safety Power Shutoffs

February 2, 2026



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EXECUTIVE SUMMARY

During extreme weather conditions, utilities may temporarily turn off power to specific areas to protect the safety of customers and communities, enacting a Public Safety Power Shutoff (PSPS). This continues to be a necessary tool of last resort to prevent our electric systems from becoming a source of wildfire ignition. To support individuals with Access and Functional Needs (AFN) during PSPS, each of the Investor-Owned Utilities (IOUs) developed its respective 2026 Annual AFN PSPS Plan (“AFN Plan” or “Plan”) with assistance from regional and statewide AFN stakeholders, representing a broad spectrum of expertise. The Plan leverages Federal Emergency Management Administration’s (FEMA) Developing and Maintaining Emergency Operations Plans Comprehensive Preparedness Guide 101.¹

The IOUs are committed to addressing the needs of individuals with AFN before, during, and after a PSPS and have established a partnership with the AFN Collaborative Council and the Statewide AFN Advisory Council² (AFN Statewide Council³) to seek guidance and address the “Why,” “Who,” “What,” and “How” to better mitigate risk and support individuals with AFN.

PacifiCorp acknowledges and is thankful to the Joint IOUs, AFN Collaborative Council and Statewide AFN Council for their guidance and commitment in developing the 2026 AFN Plan template.

WHY

As climate conditions change, the threat of wildfires in California continues to grow. One critical tool used to prevent wildfires is PSPS, in which an IOU may temporarily shut off power to a neighborhood during dangerous weather conditions to prevent the electric system from becoming a source of ignition. These safety shutoffs are a measure of last resort for keeping customers and communities safe. A PSPS, although necessary, disrupts the everyday lives of impacted individuals, including those with AFN and those who may be electricity dependent, which will be discussed further in this Plan. The purpose of this Plan is to mitigate the impact of PSPS events on individuals with AFN.

¹ For details on how to develop and maintain Emergency Operations Plans, visit: Developing and Maintaining Emergency Operations Plans Comprehensive Preparedness Guide (fema.gov)

² See Appendix A for members of the AFN Core Planning Team and Collaborative Council

³ As of 2025, the Core Planning Team has transitioned and is now listed as the AFN Statewide Council. See Appendix A for members of the AFN Statewide Council and Collaborative Council.

WHO

The IOUs have made progress in identifying individuals with AFN across their respective service areas, collectively identifying approximately 4 million⁴ people in the state through defining, mapping, enabling, and promoting self-identification. To support and target individuals that are electricity dependent, the Joint IOU Statewide AFN Advisory Council⁵ and AFN Collaborative Council developed a definition of Electricity Dependent Individuals⁶ that this Plan seeks to support. That definition remains unchanged from 2022.

Electricity Dependent Definition: Individuals who are at an increased risk of harm to their health, safety, and independence during a PSPS event for reasons including, but not limited to:

- Medical and non-medical
- Behavioral, Mental and Emotional Health
- Mobility and Movement
- Communication

PacifiCorp understands there is more work to be done and will continue these efforts to identify additional individuals with AFN in 2026.

WHAT & HOW

Working alongside the Joint IOU Statewide AFN Advisory Council and AFN Collaborative Council, PacifiCorp stays informed of the IOU's goals, objectives, and potential opportunities for enhancements in 2026, as outlined in this Plan. PacifiCorp continues to monitor and incorporate input from this process.

The IOUs' overarching goal is to mitigate the impacts of a PSPS on individuals with AFN through specialized customer outreach, education, assistance programs and services. To assess the effectiveness of these efforts, the following key performance indicators (KPIs) are used:

1. The percentage of individuals with AFN who were aware of what support and resources were available to them during a PSPS.
2. The percentage of individuals with AFN who were able to use necessary medical equipment to maintain necessary life functions for the duration of any PSPS that affected them.
3. The percentage of individuals who utilize mitigation services (e.g. community resource centers, backup power programs) and reported they were satisfied with the level of support received.

⁴ Represents total counts of AFN designations in each of the IOU's database not unique individuals or accounts

⁵ See Appendix A for a list of the members of the Joint IOU Statewide AFN Advisory Council and AFN Collaborative Council

⁶ IOUs will strive to implement this proposed definition contingent on operational feasibility and in alignment with AFN identification requirements with the CPUC's PSPS decisions. The IOUs will continue to collaborate with AFN stakeholders to refine this definition as appropriate.

1. INTRODUCTION

In accordance with the California Public Utilities Commission (Commission or CPUC) Decision (D.) 21-06-034 Phase 3 OIR Decision Guidelines and using the Six-Step Planning Process in the Federal Emergency Management Agency’s (FEMA) Developing and Maintaining Emergency Operations Plans Comprehensive Preparedness Guide 101, the Joint IOUs worked collaboratively with the AFN Statewide Council to implement the “Whole Community”⁷ approach to develop an overarching Joint IOU statewide strategy to meet the diverse needs of individuals with AFN.

Each California IOU’s AFN Plan reflects the geographical differences as well as the various needs of communities with AFN. The IOUs will provide the CPUC with quarterly updates regarding progress toward meeting the established objectives and the impact of their efforts to address this population before, during, and after PSPS, while optimizing opportunities for consistency where possible.

Section 1 below provides a high-level overview of the IOUs’ shared vision for the 2026 AFN Plan and **Sections 2 and 3** provide details for PacifiCorp’s AFN Plan. The Joint IOUs will continue benchmarking to create a consistent response across the IOU service area where possible, recognizing that resources may not be available consistently across the state.

Figure 1. 2026 AFN Plan temple update process and timeline



⁷ Whole Community approach as defined by FEMA, refers to preparedness as a shared responsibility and involvement of everyone, including but not limited to individuals and families with access and functional needs. Complete definition available at www.fema.gov/about/glossary (scroll down to “Whole Community”)

1.1 Subject Matter Experts (Engage the Whole Community)

FEMA Step 1: Form a Collaborative Planning Team — planning that is for the whole community and involved in the whole community- is crucial to the success of any plan.

A Core Planning Team, comprised of volunteers from the Statewide Council and the Joint IOUs, was created to develop the annual Access and Functional Needs (AFN) Plan. To encourage more of a “whole community approach” the Joint IOUs began leveraging the 2025 Statewide Council quarterly meetings for the development of the 2026 AFN plan. This new approach increased transparency and stakeholder participation while alleviating the time constraints typically faced during Q4 planning. The new structure removed the need for a separate Core Planning Team and maintains adherence to the 6-Step FEMA planning process.

The Joint IOU Statewide AFN Advisory Council is comprised of organizations representing the diverse needs of the AFN community. **Table 1** reflects the organizations convened by the Joint IOUs to assist in the development of the 2026 AFN Plan. See **Appendix A** for a full list of members on the advisory groups listed in **Table 1**.

Table 1. Engaging the Whole Community

Planning Group	Participants/Stakeholders
AFN Collaborative Council (per the Phase 3 OIR PSPS Decision) (see Appendix A for the full list)	California Foundation for Independent Living Centers (CFILC)
	California Health & Human Services (CHHS)
	California Office of Emergency Services (Cal OES)
	Disability Rights California (DRC)
	Disability Rights Education & Defense Fund (DREDF)
	State Council on Developmental Disabilities (SCDD)
	2-1-1 ⁹
AFN Statewide Council (See Appendix A for the full list of invited participants)	Bear Valley Electric Services (BVES)
	California Association of Area Agencies on Aging (C4A)
	California Department of Developmental Services (DDS)
	California Department of Rehabilitation (DOR)
	California Department of Social Services (DSS)
	California Public Utilities Commission (CPUC)
	County Welfare Directors Association of California (CWDA)
	Deaf Link
	Disability Action Center (DAC)
	Disability Policy Consultant
	Disability Rights California (DRC)
	Eastern Los Angeles Regional Center (ELARC)
	Hospital Council
	Interface Children & Family Service
	Kern Regional Center (KERNRC)
	Liberty Utilities
	North Los Angeles County Regional Center (NLACRC)
	PacifiCorp
	Redwood Coast Regional Center (RCRC)
	San Diego Regional Center (SDRC)
	San Gabriel/Pomona Regional Center (SGPRC)
Joint IOUs	San Diego Gas & Electric (SDG&E)
	Southern California Edison (SCE)
	Pacific Gas & Electric (PG&E)

⁹ Although 211 was not required per the Phase 3 decision, they have been invited to join the AFN Collaborative Council.

As a key component to engaging the Whole Community in planning, the IOUs will continue to solicit feedback from the AFN Collaborative Council, the Joint IOU Statewide AFN Advisory Council, each utility's respective Regional PSPS Working Groups and other regional and statewide AFN experts such as community-based organizations (CBOs), healthcare partners, representatives of durable medical equipment, and local government agencies. These groups serve as thought leaders and offer insight, feedback, and input on each IOUs' customer outreach strategy, programs, and priorities. The Joint IOUs seek to conduct regular meetings to actively identify issues, opportunities, and challenges related to the IOUs' ability to mitigate the impacts of wildfire safety strategies, namely PSPS.

The planning process presented herein provides opportunities to collect feedback and implement strategic improvements with details included in specific IOU plans. The Joint IOUs continue to look at expansion of program offerings, refresh the Joint IOU statewide PSPS Preparedness website, www.PrepareForPowerDown.com, conduct outreach and education, as well as expand access to eligible populations. PacifiCorp continues to learn from these efforts and best practices set forth by the Joint IOUs.

In addition to the aforementioned planning team efforts managed by the Joint IOUs, PacifiCorp convenes a Wildfire Advisory Board that provides additional guidance on AFN priorities in the Company's service area, as described in **Section 2: Concept of Operations**. A description of the Board is in **Section 217**, and the list of invited participants is in **Appendix A**. **Section 2** also details PacifiCorp's ongoing coordination efforts with a wide range of local partners, including trainings, exercises, events and routine meetings that foster local relationship building and information sharing that guides the contents of this Plan.

1.2 Purpose, Scope, Situational Overview and Assumptions

1.2.1 Purpose/Background — WHY

The Plan focuses on mitigating the impacts of PSPS on individuals with AFN. The IOUs intend to build on this Plan and strive for continuous improvement based on insights from the experts and feedback channels outlined in this plan.

Each IOU's respective 2026 AFN Plan addresses the following:

- Who the IOUs need to communicate with
- What resources and services are needed during PSPS
- How the IOUs communicate with individuals with AFN
- How the IOUs make resources and services available to individuals with AFN

1.2.2 Scope — *WHO*

The Joint IOUs and the CPUC recognize the definition of AFN as defined by the California Government Code §8593.3: “individuals who have developmental disabilities, physical disabilities, chronic conditions, injuries, limited English proficiencies, who are non-English speaking, older adults, children, people living in institutional settings, or those who are low income, homeless, or transportation disadvantaged, including but not limited to, those who are dependent on public transit and those who are pregnant.”

Acknowledging that the California Government Code definition of AFN is broad, the CPUC authorized the IOUs to follow the FEMA 6-Step Process by engaging the Whole Community through the Joint IOU Statewide AFN Advisory Council to create a common definition of “Electricity Dependent.” Therefore, the IOUs use this common definition to help inform new enhancements to programs and resources currently available.

Electricity Dependent: Individuals who are at an increased risk of harm to their health, safety, and independence during a Public Safety Power Shutoff, for reasons including, but not limited to:

- Medical and non-medical
- Behavioral, Mental and Emotional Health
- Mobility and Movement
- Communication

Examples of Electricity Dependent include, but are not limited to:

- **Medical and non-medical:**
 - Respiratory equipment: oxygen, respirator, inhalation therapy, apnea monitoring, suction machines, airway clearance, Airway Clearances Vests, cough assistive devices, hemodialysis
 - Nutritional equipment: gastric feed tube, specialized diet meal preparation equipment (e.g., feeding pumps, blenders)
 - Heating/cooling equipment: refrigeration, body temperature regulation
- **Behavioral, Mental, and Emotional Health:**
 - Powered equipment supporting regulation of emotional behaviors (e.g., sensory lights)
- **Mobility and Movement:**
 - Moving and positioning equipment: Lift, mobility tracking system, power wheelchairs and mobility scooters, in home chair lift, electric bed
- **Communication:**
 - Augmentative communication devices (e.g., tablets, wearables, eye gaze), alert systems
 - Powered equipment for hearing or vision support (e.g., alert systems)

1.2.3 Situational Overview

FEMA Step 2: Understand the Situation — Understanding the consequences of a potential incident requires gathering information about the potential AFN of residents within the community.

The phrase “Understand the Situation” continues to identify risks and hazards. This assessment helps a planning team decide what hazards or threats merit special attention, what actions must be planned for, and what resources are likely to be needed.

The AFN Statewide Council has identified the following key risks of PSPS:

- Individuals with AFN are unable to use power for devices or equipment for health, safety, and independence due to a PSPS.

During the planning process, the AFN Core Planning Team emphasized that the needs of individuals with AFN extend well beyond medical devices alone and that the risks are as diverse as the population. The IOUs recognize that the impacts of a PSPS are dynamic and are committed to supporting customers before, during and after a PSPS.

AFN Population and Identification

PacifiCorp has made progress and continues to seek improvements to identify electricity-dependent individuals with AFN through program enrollments and enabling self-identification. PacifiCorp identifies the following customers as AFN in the Company’s customer service system:

- Customers enrolled in the following programs:
 - Medical Certification
 - Medical Baseline (MBL), including Life-Support (Critical Care)
 - AFN Self Certification
- Customers, not enrolled in the above programs, but self-identify with customer service
 - As having a medical condition
 - As having an AFN

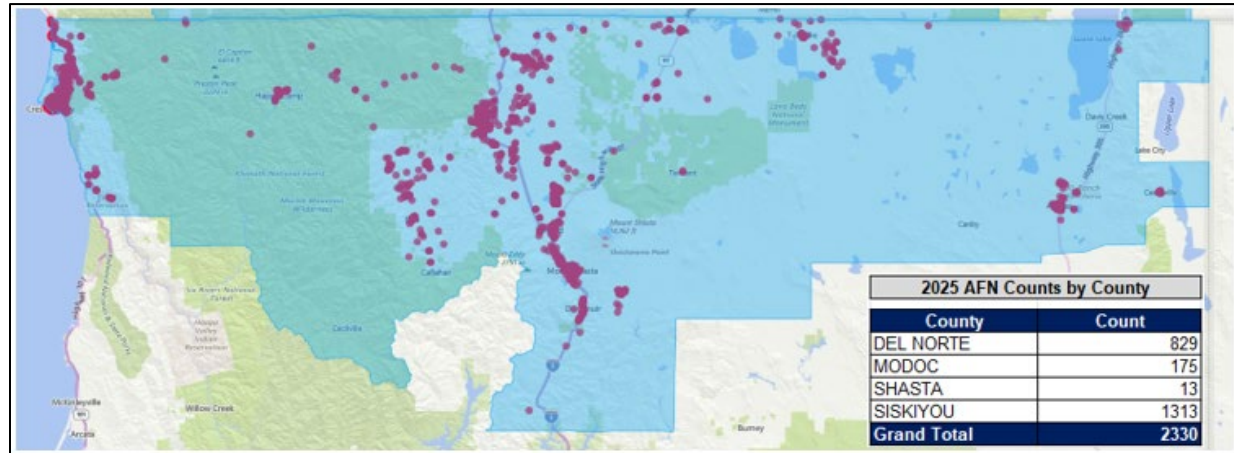
Table 2 below accounts for the number of customers identified as AFN in PacifiCorp's service territory.

Table 2. PacifiCorp's Customers with Access and Functional Needs

Customers with Medical Certificates and/or MBL	Customers self-identified as having a medical condition or other AFN (Beyond medical certificates and MBL)	Percentage of Customers Identified as AFN Based on Total Residential Customer Base
159	2171	4.96%

PacifiCorp's AFN density map shown in **Figure 2** allows the Company to quickly identify geographic areas with larger populations of individuals with AFN. This map enables PacifiCorp to strategically allocate resources by geography such as staffing a community resource center for customers experiencing a PSPS.

Figure 2. Service Area Map of PacifiCorp's Customers with AFN



1.2.4 Planning Assumptions

Below are the initial planning assumptions used to develop the annual AFN Plan:

- For PSPS, every effort is made to provide notification in advance of power shutoff
- Resources are available to individuals with AFN regardless of advanced notification
- Effective support of individuals with AFN requires a Whole Community¹⁰ approach (e.g., utilities, CBOs, non-profits organizations, government agencies)
- PSPS may occur concurrently with unrelated emergencies (e.g., active wildfires, earthquake, cyber-attacks, technological hazard incidents)
- The scope of PSPS can increase or decrease as weather conditions are monitored across the service area

1.3 Operational Priorities – WHAT

FEMA Step 3: Operational Priorities – specifying what the responding organizations are to accomplish to achieve a desired end-state for the operation.

The goal of the AFN Plan is to mitigate the impacts of PSPS on individuals with AFN served by the IOUs through improved customer outreach, education, assistance programs and services.

PacifiCorp will continue its commitment to mitigating impacts of PSPS by focusing on key objectives identified through the 2025 planning meetings: Progress will be reported out in the quarterly updates submitted to the CPUC.

2026 Key Objectives:

- Increase awareness of IOU programs and services available before, during, and after a PSPS
- Continue to identify individuals who are Electricity Dependent
- Identify new enhancements to programs and resources needed to mitigate the impacts of PSPS
- Coordinate and integrate resources with state, community and utility to minimize duplication

¹⁰ The term “Whole Community” refers to the concept as discussed in the FEMA Six Step Comprehensive Preparedness Guide.

1.4 Plan Development

FEMA Step 4: Plan Development – Develop and Analyze Courses of Action – This step is a process of generating, comparing, and selecting possible solutions for achieving the goals and objectives identified in Step 3. PacifiCorp will continue to prudently deliver consistent services and resources offerings within the plan development framework.

Recommendations to meet the Key Objectives for 2026:

Increase awareness of our programs and services available before, during and after a PSPS

- PacifiCorp will continue to identify opportunities to participate in outreach events and connect with CBOs and other AFN service providers to share utility preparedness messaging.
- PacifiCorp will continue to coordinate with CBOs and other AFN service providers as trusted messengers for outreach information.
- PacifiCorp will continue to enhance toolkits that facilitate simple outreach and message consistency.
- PacifiCorp will continue to coordinate with the Joint IOUs on the Prepare For Power Down (P4PD) website.

Continue to identify individuals who are Electricity Dependent

- PacifiCorp will continue evaluating and refining outreach tactics.
- PacifiCorp will explore additional ways to promote AFN self-identification.

Identify new enhancements to programs and resources needed to mitigate the impacts of PSPS

- PacifiCorp will continue to explore enhancements and resources for CRCs.
- PacifiCorp will continue working with internal teams to explore additional permanent solutions, including solutions for those that cannot leave their homes.

Coordinate and integrate resources with state, community, utility to minimize duplication

- Identify opportunities and efficiencies to ease Medical Baseline (MBL) program enrollment in accordance with CPUC and legislative framework.
- PacifiCorp will continue to explore opportunities for presentations and future outreach collaboration.
- PacifiCorp will continue to coordinate with the Joint IOUs on the Prepare For Power Down (P4PD) website.

1.5 Plan Preparation and Review

FEMA Step 5: Prepare and Review the Plan – This step is a process of preparing the document and getting it ready for implementation.

Prior to finalizing the 2026 AFN Plan, the Joint IOUs provided members of the AFN Collaborative Council and AFN Statewide Council with a draft plan for their review. As a result, each of the IOUs will file their respective 2026 AFN Plans with the CPUC by January 31, detailing its programs to support individuals and communities with AFN before, during, and after PSPS.

PacifiCorp continues to use the Joint IOU template, maintaining consistency with that template where possible.

1.6 Plan Implementation

FEMA Step 6: Implement and Maintain the Plan – This is the final step which is an ongoing process of training personnel to perform tasks identified in the plan, exercising, and evaluating plan effectiveness, and revising and maintaining the plan.

Upon filing the AFN plan, each IOU will implement new and maintain existing goals and objectives as specified in the Plan. Additionally, the IOUs will provide quarterly updates on progress made and report on performance through identified success measures and metrics.

1.7 Research and Surveys

In 2026, the IOUs will continue to collaborate and share best practices as they solicit feedback about PSPS resources offered to individuals with AFN through a variety of channels, including consultation with various advisory groups.

PacifiCorp will continue to solicit feedback from the Wildfire Advisory Board, local governments, tribes, and critical facilities; a webinar for customers and communities; wildfire and PSPS awareness studies; feedback via digital channels; PSPS Tabletop Exercises; and PSPS notification message testing.

As a result of feedback and research from CBOs, local governments, and tribes who support AFN populations, the IOUs are committed to continuously reviewing the needs of individuals with AFN before, during, and after PSPS. This thorough review allows the IOUs to enhance support for individuals who rely on electricity to maintain necessary life functions, including those who utilize durable medical equipment and assistive technology.

1.8 Success Measures and Metrics

In 2026, PacifiCorp will continue to use the Key Performance Indicators (KPIs) initially developed with the AFN Core Planning Team for the 2022 AFN Plan. These KPIs seek to measure the impacts of PSPS on individuals with AFN, awareness of support programs, and satisfaction of services offered during a PSPS. Pre and post wildfire season survey and interview results that address the KPIs can be found in **Appendix C** of this report.

Key Performance Indicators to measure impact:

1. The percentage of individuals with AFN who were aware of what support and resources were available to them during a PSPS.
2. The percentage of individuals with AFN who were able to use necessary medical equipment to maintain necessary life functions for the duration of any PSPS that affected them.
3. The percentage of individuals who used mitigation services (e.g. CRCs, backup power programs) and reported satisfaction with the level of support received.

2. CONCEPT OF OPERATIONS - HOW

This concept of operations describes PacifiCorp's approach to supporting customers with access and functional needs before (preparedness), during (response) and after (recovery) a PSPS.

2.1 Preparedness/Readiness (Before Power Shutoff)

PacifiCorp's AFN customers can access information on wildfire preparedness and programs through communication campaigns, outreach, personal contact and when an event is forecasted, in real-time on the Company's website.¹¹ All customers have access to the Company's online webinars, events, and preparedness information to ensure that any non-identified AFN customers have an opportunity to access resources. PacifiCorp's AFN and wildfire programs are identified below. In 2026, the Company will continue its commitment to providing programs and services that are easily accessible to customers.

2.1.1 AFN Identification

PacifiCorp understands the importance of identifying customers with AFN through a variety of channels. The Company offers multiple pathways for customers to self-identify, as listed below. At the beginning of 2026, PacifiCorp has 2,330 customers in the Company database. See **Table 2** for more information about AFN numbers.

- Self-attest with customer service: Customer service representatives are trained to listen for key words during phone conversations that indicate an AFN. The customer service representative will flag the customer's account and will share information about programs for which the customer may be eligible.
- AFN Self-Certification Form: New in 2025, customers can complete an AFN Self-Certification webform¹², located on the Accessibility webpage¹³.
- CARE application: PacifiCorp's application for the California Alternate Rates for Energy (CARE includes a check box for customers to self-identify as having an AFN).
- Medical Certificate: Customers who are electricity dependent¹⁴ can submit a medical certificate from their medical professional. Customers enrolled in the medical certificate program who depend on electricity for qualifying critical care and life support equipment are automatically enrolled in the company's Medical Baseline program.

¹¹ <https://www.pacificpower.net/outages-safety/wildfire-safety/public-safety-power-shutoff.html>

¹² <https://csapps.pacificpower.net/public/outages-safety/afn-self-certification/en>

¹³ <https://www.pacificpower.net/outages-safety/access-and-functional-needs.html>

¹⁴ The CPUC defines **electricity dependent** individuals as those who are at an increased risk of harm to their health, safety, and independence during a Public Safety Power Shutoff, for reasons including, but not limited to: medical and non-medical; behavioral, mental and emotional health; mobility and movement; and communication.

In 2026, the PacifiCorp will explore opportunities to enhance the new AFN Self-Certification Form. The Company will review the medical certificate webpage for ways to standardize and simplify information. The website and outreach materials will be reviewed for enhancements. Targeted outreach to AFN customers will be conducted through regional centers, Tribal partners, healthcare organizations, and other AFN service providers.

2.1.2 Backup power programs

Due to new safety warnings for portable power packs published by Underwriter Laboratories, UL 2743, PacifiCorp updated the Company's terms and conditions, and qualifying products lists for both backup power programs in 2025 and will remain in place for 2026.

Portable Battery and Backup Electric Power Generator Rebate Programs¹⁵

PacifiCorp offers a backup electric power rebate for residential customers in its California service territory. All residential customers are eligible to claim a rebate of up to \$300 for the purchase of a backup power supply, and customers enrolled in the Medical Certificate or California Medical Baseline Program are eligible to claim a rebate of up to \$800. Items approved for the rebate program include portable batteries, power stations, and gasoline generator options. Tenants and property owners are eligible to claim a rebate. Since the inception of the program, 791 customers have received rebates.

On December 31, 2025, PacifiCorp's contract with vendor Resource Innovations to administer the rebate program was completed. The contract for 2026 will be reviewed during the first quarter of 2026.

Also in 2026, PacifiCorp will continue to review the Backup Electric Power – Generator Rebate Program's webpage for improvements to streamline information and increase accessibility. PacifiCorp will coordinate with the Board, CBOs, healthcare organizations and other AFN service providers to identify opportunities to amplify and broaden messaging about the Company's backup power programs.

Free Portable Battery Program

PacifiCorp offers free portable batteries to customers receiving the California Alternate Rates for Energy (CARE) and those enrolled in the Baseline Program. The program includes contracted services to provide comprehensive customer outreach, a backup power needs assessment, and delivery and setup of portable batteries. As part of delivery and setup, program participants receive individual education about proper use and maintenance of their device, and ongoing remote technical support as needed. A total of 106 customers in the medical baseline and California Alternate Rates for Energy programs have received portable batteries to date.

¹⁵ See PacifiCorp back up electric power website for more information, <https://www.pacificpower.net/outages-safety/storm-emergency-preparedness/backup-generators.html>

In 2026, PacifiCorp will continue to review the Backup Electric Power – Free Portable Battery Program’s webpage for improvements to streamline information and increase accessibility. In addition, PacifiCorp will coordinate with the Board, CBOs, healthcare organizations and other AFN service providers to identify opportunities to amplify messaging about the Company’s backup power programs.

2.1.3 Resiliency Programs

PacifiCorp previously offered a grant program to communities seeking to enhance emergency preparedness with renewable generators and energy storage. This program has ended, and funds have been exhausted. A final report on resiliency efforts was submitted via Advice Letter 690-E on August 11, 2022, which contains a more detailed account of the program summarized below.

- No applications were received for portable renewable generators.
- Five technical studies were developed for critical facilities interested in learning more about the costs and benefits of increased on-site resiliency.
- Three critical facilities have been approved to receive grant funding for energy storage projects. As of January 31, 2023, two of those projects completed installation and have been awarded funding.
- The Yurok Tribe is the third and final applicant. A grant will formally be awarded upon completion of project construction and commissioning.

2.1.4 Customer Assistance Programs

PacifiCorp offers a wide range of programs to support customers, from help with utility bills to energy assistance and programs for customers with medical conditions.

Financial Assistance Programs

Medical Baseline (MBL) Program

PacifiCorp’s MBL program helps customers who have additional energy needs for qualifying medical conditions. Qualifying residential customers receive a lower rate on their monthly energy bill. Customers in the MBL program are designated as AFN customers and receive additional PSPS notifications, when possible, and may be eligible for additional backup power program offerings.

California Alternate Rates for Energy (CARE) Program

PacifiCorp offers income-qualifying residential customers with a 25% discount on monthly bills through the CARE program.

Low-Income Home Energy Assistance Program (LIHEAP)

PacifiCorp customers in low-income households may receive assistance with home energy costs. LIHEAP is administered by the California Department of Community Service and Development through local agencies.

Energy Assistance (ESA) Program

PacifiCorp partners with local community-based organizations to provide energy-saving improvements at no cost to income-qualifying homeowners and renters living in single-family homes, mobile homes or apartments.

Project HELP

PacifiCorp customers may be eligible for support through Project HELP, a nonprofit program administered by The Salvation Army.

Additional Assistance Programs

Medical Certificates

PacifiCorp residential customers with a serious health condition that (1) could be aggravated by a loss of power in their home or (2) require electricity powered medical equipment in the home, can enroll in the medical certificate program to receive additional notifications when possible during PSPS events, and may be eligible for a baseline allowance at a lower rate and additional backup power opportunities. PacifiCorp's medical certificate online application is available in English and Spanish.

Gift Payment

PacifiCorp provides family and friends the opportunity to make a payment for a customer who may need assistance in paying their electric bill.

Equal Pay

PacifiCorp offers customers the option of paying the same amount each month, based on the average of the last 12 months of billing, allowing for easier budgeting and leveling out seasonal highs and lows.

2.1.5 Emergency Coordination Center

PacifiCorp has established an Emergency Coordination Center (ECC) following the National Incident Management System (NIMS) guidance. ECC staff are available to support all hazardous responses, including PSPS events. The ECC plays a vital role in monitoring and verifying AFN customers are contacted throughout a PSPS event. AFN customers impacted by a PSPS are identified through a Geographic Information System customer list which is provided to the Company's customer service group and the ECC Executive. Customer service is responsible for providing PSPS notifications to all customers, and additional notifications to AFN customers. During each ECC meeting, customer service provides a status update on notifications and may escalate unmet needs of AFN customers to the ECC Executive to determine if additional action by the Company or local emergency management is required.

With the addition of an AFN Program Manager in 2024, a new AFN Coordinator position was established in the ECC. The AFN Coordinator works with customer service, the Joint Information Team, and the ECC Liaison to quickly relay and address the unmet needs of AFN customers with local public safety partners. In 2025, PacifiCorp began training other emergency management personnel on the ECC AFN Coordinator role to provide the bench strength to the position.

In 2026, PacifiCorp will review and update ECC position checklists and processes during the *Emergency Response Plan (ERP)* update. The ERP is reviewed and submitted annually to the CPUC as part of the General Order 166 (GO 166) report.

2.1.6 Training and Exercise

PacifiCorp conducts annual PSPS exercises utilizing a whole community approach. The training standards are being developed with other California IOUs and the California Office of Emergency Services, utilizing National Incident Management System (NIMS) courses. During exercise planning, emergency management agencies from tribal, state, county and local jurisdictions, community-based organizations, public health agencies, and any other potentially affected agency, are invited. PacifiCorp's annual PSPS exercises include components that test the Company's protocols related to access and functional needs during extended power outages, including notification processes.

PacifiCorp continues to enhance and expand the training program for ECC staff. All ECC personnel are assigned to complete the FEMA training listed below. Additional training may be assigned for specialized positions based on decision making authority.

- IS-100 Introduction to the Incident Command System
- IS-200 Basic Incident Command System for Initial Response
- IS-700 An Introduction to the National Incident Management System
- IS-800 An Introduction to the National Response Framework
- All-hazards specific training for each position

2.1.7 PSPS Preparedness Outreach and Community Engagement

Dissemination of timely, accurate, accessible, and actionable information to the public is important in all phases of PacifiCorp's incident management. Communication efforts are listed in the Company's Wildfire Mitigation Plan and Emergency Response Plan which describe the Company's communication and notification processes with public and partner organizations throughout the preparation, response and restoration cycle. Communication with AFN customers and external partners as early as possible is essential. The PacifiCorp Joint Information Team has established processes and tools to facilitate communication with customers, the public, news organizations, government entities and other external stakeholders through social media, the Company's website, press releases and notification protocols to ensure consistent and comprehensive messaging.

PacifiCorp may continue to refine these communications processes in 2026, building off feedback and lessons learned during trainings, exercises, real world events, advisory groups, customer surveys, and partner interviews.

PacifiCorp Wildfire Advisory Board

In addition to participating in the Joint IOUs' advisory and planning efforts, PacifiCorp established a Wildfire Advisory Board (Board) in 2021 to provide direct feedback on the Company's Wildfire Mitigation Plan, PSPS Playbook, Community Resource Center Playbook and Access and Functional Needs Plan. The Board meets twice annually, before and after the wildfire season. Next steps following each Board meeting are reported in PacifiCorp's quarterly report.

The Board consists of public safety partners, local government representatives, tribal officials, community-based organizations, and a representative from the AFN community. See **Appendix A** for a list of Board members. Recommendations from the Board inform improvements to the PSPS program. In 2026, PacifiCorp will continue to seek additional perspective and AFN representation on the Board.

AFN Program Manager

In 2024, PacifiCorp created and staffed an Access and Functional Needs program Manager role that resides within the emergency management team and oversees the development of an integrated access and functional needs program.

In 2026, the AFN Program Manager will continue to:

- identify areas for improvement within existing customer programs;
- look for additional programmatic opportunities;
- convene the Wildfire Advisory Board;
- engage with the Joint IOUs and SMJUs; and
- seek opportunities to expand relationships and outreach with CBOs, healthcare organizations and other AFN service providers.

AFN Public Education and Outreach

PacifiCorp provides additional PSPS notifications to individuals who have self-identified as having an access or functional need, including medical and medical baseline customers. Having key messages across several communications channels and materials asking AFN customers to self-identify with the Company is a vital component to the Company's community engagement and customer outreach strategy.

PacifiCorp has engaged a vendor to survey customers to help inform the Company's communication and education plan, including a strategy which can be tailored for AFN customer outreach and engagement. This includes assessing the need and type of communication channels for people with AFN who may not be able to use standard forms of communication. Survey data has informed the overall outreach strategy, and the Company has adjusted and expanded where key messages are disseminated to increase AFN self-identification.

PacifiCorp continues to provide information about the PSPS notification process, how to prepare for outages, the Company's backup power programs and benefits of AFN self-identification. In 2026, outreach tactics will be informed by customer survey findings, partner interviews, Wildfire Advisory Board feedback, and direct feedback from public safety partners, CBOs and other AFN service providers. Upon completion, new and updated materials will be distributed through these partners. PacifiCorp's PSPS AFN outreach plan for 2026 is shown in **Table 3** below.

Table 3. 2026 AFN PSPS Outreach Tactics and Initiatives

Outreach tactic	2026 initiatives
Wildfire Advisory Board	PacifiCorp will continue to convene the Board to share PSPS information, identify additional perspectives and AFN representation, and to seek guidance on local outreach opportunities.
Accessibility Programs Toolkit	PacifiCorp will update and distribute the Accessibility Programs Toolkit to external partners. <u>New in 2026:</u> PacifiCorp will also share the Accessibility Programs Toolkit with community resource centers and senior centers.
Master Meter and Tenant Preparedness Toolkit	PacifiCorp will update and distribute the Master Meter and Tenant Preparedness Toolkit.
Website	PacifiCorp will continue to maintain the Company's PSPS, Accessibility and other customer program websites, and seek opportunities to enhance their accessibility. <u>New in 2026:</u> PacifiCorp will explore opportunities to further simplify online navigation of customer programs, including through customer accounts. <u>New in 2026:</u> PacifiCorp will review the medical certificate website for updates. <u>New in 2026:</u> PacifiCorp will look at adding information about local resources to the Company website, as appropriate.
Social media	PacifiCorp will continue to post content to social media sites and attempt to provide information in English and Spanish during a PSPS.
Tribal Engagement	PacifiCorp will continue to coordinate with Tribal partners on engagement opportunities and to seek opportunities to post information about wildfire safety and PSPS in Tribal publications, including information about AFN programs. <u>New in 2026:</u> PacifiCorp will expand its database of Tribal contacts in California.
Collateral	PacifiCorp will continue to publish and distribute PSPS informational brochures, including the simplified AFN program flyer in English and Spanish. <u>New in 2026:</u> PacifiCorp will look at adding information about local resources to collateral, as appropriate.
Customer E-mail	Before wildfire season, PacifiCorp will continue to e-mail PSPS and customer program information to all customers.
Bill messages	Before and during wildfire season, PacifiCorp will continue to send on-bill messages about wildfire safety and preparedness, including customer programs.

[illegible]

PacifiCorp's customer service agents have access to and training with wildfire safety, preparedness and PSPS-related communications and can facilitate a conversation between the customer and translation service to ensure the customer can receive wildfire safety and preparedness and PSPS-related information. Information about customer programs is available through customer service in over 300 languages including Chinese traditional, Chinese simplified, Tagalog, Vietnamese, Mixteco, Zapoteco, Hmong, German, and Spanish.



CORTES ELÉCTRICOS PARA LA SEGURIDAD PÚBLICA (PSP)

Preparación del Arrendatario

Para garantizar la seguridad de nuestros clientes y comunidad, puede ser necesario cortar el suministro eléctrico en áreas que se encuentran con condiciones físicas, extremadamente peligrosas para la presente necesidad. Esto se hará con el Comité Técnico para la Seguridad Pública (CTSP) y se presentará un informe que indique los riesgos y se presentará un presupuesto para el trabajo. Como arrendatario, puede tomar las siguientes medidas de preparación para mantenerse informado y seguro.

- **Pagos de una emergencia y de corte por los servicios durante el PSP.** Este costo puede ser **alto** y **pagable** por adelantado. Los clientes deben estar preparados para pagar un plan que se adapte a sus necesidades ([¿Cómo pagar el PSP?](#))
- **Vista nuestros tipos de corte de energía** para obtener información sobre los cortes de energía ([¿Qué tipos de corte de energía?](#))
- **Identifique las personas locales que pueden ayudar con sus necesidades antes y durante el PSP,** como el 2-1-1, los vecinos de alrededor suyo y el tiempo de respuesta.

Inscripción en el Programa de Gestión de la Seguridad Pública de Pacific Power.

Los clientes que dependan de la electricidad para aparatos médicos pueden inscribirse en el Programa de Gestión de la Seguridad Pública. Para obtener más información, visite [www.pacificpower.com/psps](#).

Los clientes que son un Certificado Médico de Necesidad de Servicios Esenciales pueden obtener un PSP, pero no una tarifa reducida.

Agrega tu lista de seguridad y de corte de energía al registro. Algunos clientes pueden no elegirlos para futuras grandes remodelaciones.

- Los clientes que se registran al día siguiente de resultados, visiten [www.pacificpower.com/psps](#)
- Los clientes en Oregon o California pueden no elegirlos por un reembolso de energía o requisitos a una lista de espera. Los requisitos de elegibilidad están disponibles en [www.pacificpower.com/psps](#)
- Nacional e **Historial de Cliente** Nombre de Cliente Dirección de la Cuenta de Pacific Power para solicitar un Certificado Médico y los programas de energía de respaldo.

PACIFIC POWER

APAGONES

SEGUIDAD

OPCIONES

SIGN IN

Apagones

Centro de tormentas

Energía confiable

Necesidades de accesibilidad

Necesidades de accesibilidad

En Pacific Power, sabemos que la electricidad es algo más que energía: es vital para su salud, seguridad e independencia. Ya sea que tenga una discapacidad, dependa de equipos médicos o prefiera recibir información en un idioma distinto al inglés, estamos comprometidos a brindarle nuestro apoyo.



Autocertificación

¿Alguien en su hogar tiene una discapacidad o utiliza un aparato que depende de la electricidad para su salud, seguridad o independencia? Déjenos saber al autocertificar que tiene una necesidad funcional o de acceso.

La Autocertificación nos permite, cuando sea posible, brindarle notificaciones adicionales durante una Interrupción del Servicio Eléctrico por la Seguridad Pública. Autocertificarse no garantiza que no se corte el servicio por falta de pago.

Tenga en cuenta que Pacific Power puede tardar hasta tres días en procesar su solicitud y agregar la información a su cuenta.

AUTOCERTIFICABLE

Tribal Engagement

A significant portion of the Karuk Tribe's offices and lands are in a high fire consequence area of Siskiyou County. PacifiCorp's regional business manager conducts regular calls with the Tribe's leadership to quickly address any issues as they arise and to discuss PacifiCorp's operations in the area including wildfire mitigation and PSPS. Representatives from the Karuk Tribe are standing members in the PacifiCorp Wildfire Advisory Board. The Yurok Tribe and Quartz Valley Indian Reservation also sit on the Board and provide invaluable feedback on Tribal priorities.

In 2023, the Company hired a Tribal Liaison Representative who provides internal guidance and support to staff who work with Tribes or are seeking partnership with Tribes in PacifiCorp service territories. The Tribal Liaison also supports understanding of cultural needs and protocols. In coordination with the Company's Tribal Liaison Representative, PacifiCorp will continue to for Indigenous customers who have indicated that have an AFN.

foster relationships with Tribal leaders and staff and explore additional collaboration opportunities. In 2026, PacifiCorp will expand its database of Tribal contacts in California, including key staff with whom the Company coordinates, including Tribal Administration and Council, Emergency Management, Cultural and Natural Resources, and Economic Development.

CBO Outreach

PacifiCorp's regional business managers and emergency managers routinely coordinate with community partners, including community-based organizations, healthcare organizations and other AFN service providers, acting as the conduit for sharing information to and from these local partners. Maintaining relationships with these community partners creates opportunities for PacifiCorp to connect with the broader community through partner websites, social media, local events, and targeted outreach to helps to raise awareness of PacificCorp's programs and resources.

PacifiCorp partners with Great Northern Services in Weed, the Karuk Tribe Community Center in Happy Camp, the Redwood Coast Regional Center and Far Northern Regional Center in addition to coordinating with Wildfire Advisory Board members (identified in **Appendix A** of this report) and local partners on outreach opportunities.

The Company continues to seek additional messaging avenues outside of its currently defined outreach strategy. This involves working with community partners to find appropriate places and spaces to add AFN-specific messages to existing platforms such as CBO emails, webpages, or social media pages. This work is ongoing and is carried out by the Company's regional business managers who collaborate closely with their community stakeholders and through direct outreach to community organizations by the access and functional needs program manager and emergency management personnel. In 2026, PacifiCorp will conduct targeted outreach to CBOs and other AFN service providers, based on recommendations from Wildfire Advisory Board, customer surveys, partner interviews, and other suggestions from local partners.

Customer Surveys

Each year, PacifiCorp conducts two surveys, one pre- and one post-fire season. MDC Research has been contracted to collect data from customers and to conduct interviews with CBOs and other community partners. The goal is to evaluate the impact of the Company's communication campaigns, receive direct feedback from community partners on outreach, support, and process improvements, and to collect demographic information about our customers. Surveys are conducted via phone and the web. A comprehensive report on the Company's 2025 survey results is located in **Appendix C**.

In 2025, PacifiCorp refined the Company's survey questions to minimize jargon, simplify language, clarify customer understanding of the Company's wildfire mitigation measures and awareness of customer AFN programs and needs. Question wording modifications resulted in a notable reduction in the number of respondents who identified as having an AFN, from 75% in both rounds in 2024, to 31% in both rounds of 2025. This indicates that previous percentages of customers self-identified as AFN were likely inflated.

To boost awareness of customer programs, such as the medical certificate, medical baseline, backup power and CARE programs, PacifiCorp added a question at the end of the survey for those identified as having an AFN. AFN respondents were asked if they would like to learn about customer programs via the Company website, by calling customer service, or if they would like information to be emailed or mailed to them. In 2025, PacifiCorp sent customer programs information to 355 respondents via email (194) and by mail (161), based on customer preference.

Post season surveys were conducted in November and December 2025. The report, located in **Appendix C**, was published in late December. PacifiCorp will analyze these findings and report on areas for improvement in the 2026 AFN Quarter One Report.

CBO and Partner Interviews

MDC Research also conducts in-depth interviews with CBOs and other partners in PacifiCorp's California service area concurrent to the two waves of customer surveys. The interviews last 30 minutes and are conducted virtually.

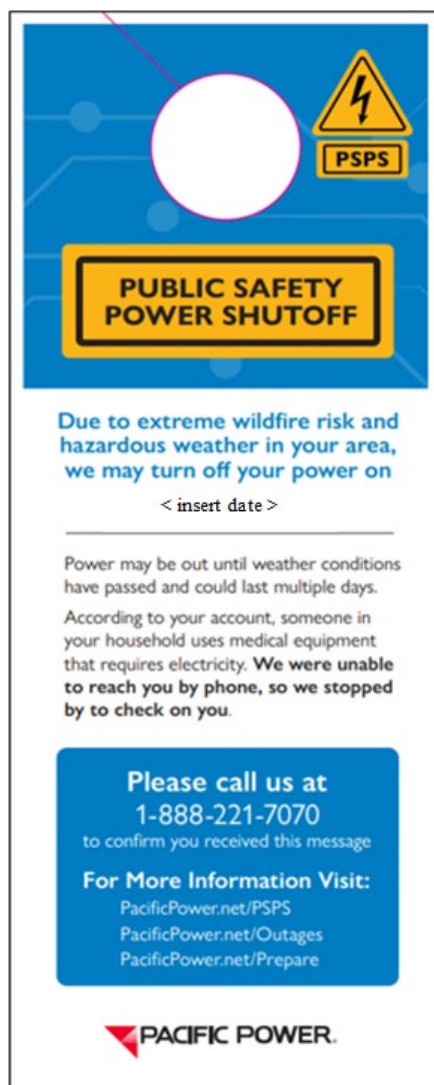
Post-season interviews were conducted in November and December of 2025. The report, located in **Appendix C**, was published in late December. PacifiCorp will analyze these findings and report on areas for improvement in the 2026 AFN Quarter One Report.

2.2 PSPS Activation (During – Emergency Coordination Center activation)

2.2.1 PSPS Communications

All Customers

PacifiCorp's Public Safety Power Shutoff event communication and notification plan has two primary systems. First, direct communications through pre-identified channels are used to provide detailed notices to key stakeholders, namely public safety partners and critical facilities and critical infrastructure. Second, a series of automated notices (e-mail, text, and direct phone calls) to customers, together with published information on the Company's website, social media channels, and proactive media outreach, are employed to provide notice to the public at the primary stages of the PSPS process, including at a minimum for pre-activation, activation and re-energization. The communication and notification plan are exercised annually, as part of the PSPS tabletop and functional exercises, and refined as appropriate.



AFN Customers

When a PSPS event is forecasted, a list of impacted customers is extracted from the Customer Service System where AFN customers are identified, and customer service staff attempt to make personal phone calls to each customer. To the extent possible, PacifiCorp sectionalizes circuits into smaller zones for de-energization in order to minimize customer impacts, and subsequently, the number of AFN customers de-energized. This approach helps PacifiCorp to personally reach out to AFN customers. Contact occurs prior to an event, at the beginning of re-energization, and after energization is completed. Customer service tracks if a positive confirmation of contact was made with medical baseline (MBL) and AFN customers. The results of the contact are reported to the ECC Executive.

If an AFN customer needs additional assistance, the AFN Coordinator coordinates with customer service, the ECC Joint Information Team, and the ECC Liaison to quickly relay the information to local public safety partners. Such coordination may lead to a wellness check. During wellness checks, PacifiCorp will leave a PSPS door hanger with customers. Door hangers include the date of the potential PSPS and where to find information about PSPS resources.

In 2026, PacifiCorp will explore data sharing requirements with local public safety partners to support PSPS wellness checks for uncontacted AFN customers.

2.2.2 Website

To ensure that the public can access timely and detailed information about both potential and actual PSPS events relevant to a particular location, PacifiCorp has modified its main PSPS webpage, available at www.pacificpower.net/psps. The web-based tool allows members of the public to enter an address into a search bar to determine in real-time, if that address is in an area which may be subject to a PSPS. In 2026, PacifiCorp will look at adding information about local resources to the Company website.

An additional online tool is available for members of the public to see the “Public safety power shutoff forecasting” for that area over the following week. The status indicates and defines whether the area is operating as “Normal,” whether there is a PSPS “Watch,” or whether there is an actual PSPS “Event.”

PacifiCorp’s Weather Awareness Website received numerous enhancements in 2024 in order to meet two goals for both customers and PacifiCorp’s operations and leadership teams: to better serve as a weather-related decision-support platform, and to better deliver local weather information. These improvements include the ability for PacifiCorp’s meteorology team to access additional fire metrics at a more granular level, which are internally facing. Additional mapping tools and weather variables were added to increase forecasting data and situational awareness of ability across the service territory. PacifiCorp’s website performed well during the September 2020 windstorm event where a significant surge in website visits enabled +/- 200,000 visitors and more than 1.6 million web page views. This event demonstrated capable broadband performance.

2.2.3 Public Safety Partner Portal

PacifiCorp has developed a Public Safety Partner Portal, a secure web-based application that hosts information about customers identified as critical facilities or infrastructure. Key information includes location, primary/secondary contact information, backup generation capabilities, and more. The portal is accessible to approved partners during PSPS events to increase transparency, consistent information sharing and overall awareness of potentially affected facilities. Public safety partners with access include emergency responders from federal, state, local and tribal governments, telecommunication providers, water agencies, public-owned utilities, emergency hospitals, and transportation agencies. The portal also helps PacifiCorp prioritize restoration, backup power evaluation, additional communications, and other resources before and during PSPS events to critical facility customers who provide services essential to public safety. PacifiCorp conducts annual training and exercises on the portal with public safety partners.

In 2026, PacifiCorp will work on enhancements to the Public Safety Partner Portal to improve platform security, usability, and performance. Key priorities will include the following.

- Aligning user access audits with security standards
- Integrating application programming interface for seamless data exchange between application programs
- Redesigning the interface for better user experience
- Expanding reporting and analytics with dynamic capabilities
- Optimizing architecture for scalability
- Enhancing registration and administrative tools for accurate facility management

2.2.4 PSPS Customer Notifications

Multiple communication channels are used for customer notifications, including:

- Outbound calls
- Social media updates
- Texts and emails
- Website update
- Press release
- Personal phone calls to AFN customers

PacifiCorp's PSPS notification plan for customers with AFN is displayed in **Table 4**.¹⁶

Table 4. PacifiCorp's PSPS AFN Notification Plan

AFN Population Type	PSPS Notification Plan
Medical certificate	Standard PSPS notification via all available channels; plus, additional PSPS notifications via personal phone calls; and in person welfare check if unable to reach via phone
Medical certificate with life support	Standard PSPS notification via all available channels; plus, additional PSPS notifications via personal phone calls; and in person welfare check if unable to reach via phone
Medical baseline	Standard PSPS notification via all available channels; plus, additional PSPS notifications via personal phone calls; and in person welfare check if unable to reach via phone
Access and functional needs, self-identified	Standard PSPS notification via all available channels; plus, additional PSPS notifications via personal phone calls; and in person welfare check if unable to reach via phone
Limited English proficiency	Standard PSPS notification via all available channels
Tribes	Standard PSPS notification via all available channels; and media releases, social media, website; and Pacific Power's tribal liaison, emergency management personnel, public safety partners, ESF12, and/or regional business managers
People in remote areas	Standard PSPS notification via all available channels; and media releases, social media, website
Priority essential service organizations, including CBOs and critical facilities that serve AFN populations	Notifications via emergency management personnel, public safety partners, ESF12, and/or regional business managers; and via the public safety partner portal

¹⁶ As found in the updated Table 13 – AFN Population Subset Notification Plan, location in R.18.12.005 PacifiCorp's 2024 PSPS Pre-Season Report available at https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/outages-safety/wildfire-safety/california-reports/R.18-12-005_PacifiCorp_2024_PSPS_Pre-Season_Report_PUBLIC_12-20-24.pdf

2.2.5 Community Resource Centers

Community resource centers (CRCs) are an integral part of ensuring community members affected by PSPS events have access to basic resources and up-to-date information. During a PSPS event, PacifiCorp closely coordinates with local public safety partners to determine CRC needs and locations. CRC locations are vetted using a checklist that was developed following guidance identified from the California Public Utilities Commission decisions and the current Americans with Disabilities Act Checklist for Emergency Shelters to ensure CRC services are equitable and accessible for medical baseline and access and functional needs populations.

PacifiCorp emergency management meets regularly with local and regional organizations that provide services to the AFN community, local emergency managers, and other support groups to ensure AFN and medical baseline needs are identified at CRCs, and that CRC resources are equitably distributed and accessible. When activated, the CRCs will be listed on the Company's public website.

Services/resources provided at CRCs include:

• Parking signage and traffic safety equipment • Shelter from environment • Heating and cooling capabilities • Air purifiers & air quality monitors • Potable water & non-perishable snacks • Seating and tables • Restroom facilities • Refrigeration & heating for medicine and baby needs • Interior and area lighting • Televisions • Games and entertainment activities	• Ice • On-site security • Communications capability such as Wi-fi, radio, cellular phone etc. • On-site medical support (EMT-A at a minimum, Paramedic preferred) • Charging stations for cell phones, medical devices, radios, computers, etc. • Small crates for pets • AFN/LEP population support • Personal Protective Equipment • Portable ADA ramp
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PacifiCorp will continue to gather feedback from customers who utilize CRCs, logistics staff, the public utility commission and PacifiCorp employees in order to optimize CRC messaging, accessibility, support for medical and essential devices and the unmet needs of all customers including those who identify as AFN. Feedback is also gathered via printed surveys that are onsite at the CRC, online, and through customer service. Areas for improvement gathered via these feedback channels and after-action reports will inform the next CRC Playbook update, scheduled for April 2026.

2.3 Recovery (After – Power has been restored)

2.3.1 AFN Support

AFN customers are contacted by customer service after the power is restored, as a continuation of the ongoing contact prior to and throughout a PSPS event. The check-in ensures no additional support is needed for the customer after the power is restored.

Unmet AFN needs identified during post-re-energization wellness checks are escalated to the ECC. The AFN Coordinator or ECC Liaison would then coordinate with the local EOC to identify local resources to support the customer.

2.3.2 After Action Reviews and Reports

As with any other incident or event, action reports are completed for PSPS responses. These reports provide an opportunity to identify what went well during the event execution and where improvements are needed. These findings are incorporated into future procedural improvements and as available, provided in the California Public Utility Commission post-event report in compliance with Resolution ESRB-8.

2.3.3 Lessons Learned and Feedback

PacifiCorp uses all events and incidents to gain feedback and identify future opportunities for improvement. As a part of the Company's internal improvement cycle, the feedback and identified improvement opportunities are key measurements PacifiCorp uses to make corrections and adjust plans. Bi-annual customer surveys, CBO and partner interviews and ongoing reporting provide routine feedback and measurement of PacifiCorp's performance before, during, and after an event.

3. INFORMATION COLLECTION, ANALYSIS AND DISSEMINATION

PacifiCorp has contracts with three CBOs in California to share customer information. The information transfer is protected and is used to assist with CARE program Post Enrollment Verification (PEV), weatherization program, and receipt of energy assistance benefits. Additionally, the Company has an agreement with the State of California Department of Community Services and Development (CSD) for the Low-Income Home Energy Assistance Program. The agreement entitles agencies to customer information in PacifiCorp's Energy Assistance Portal to allow them to carry out provisions of LIHEAP (Low Income Home Energy Assistance Program). No other agreements for customer information sharing exist with local agencies, government agencies, or health providers.

4. AUTHORITIES AND REFERENCES

4.1 Annual Report and Emergency Response Plan in Compliance with General Order 166

PacifiCorp's Emergency Response Plan is updated annually and was last published in April 2025. All updates are in compliance with GO 166.

4.2 Phase 3 OIR PSPS Guidelines: AFN Plan and Quarterly Updates

Each IOU's annual AFN Plan and quarterly updates must incorporate, at a minimum, the six steps outlined in the Federal Emergency Management Administration's Comprehensive Preparedness Guide.

As PacifiCorp implements the 2026 AFN Plan, quarterly updates will be provided to the California Public Utility Commission. Revisions will be tracked each time the plan is modified and include descriptions, locations and date of the revisions made, and names of the persons responsible for the revisions.

5. CHANGE RECORD

Section	Person Responsible for Revision	Change	Date
Various	Various PacifiCorp Personnel	Various updates to align with the 2024 Joint IOU AFN Plan and updates regarding AFN customer counts, survey results, and website enhancements.	January 31, 2024
All	Various PacifiCorp Personnel	<u>Updated</u> • Significant updates in Section 1 to align with the Joint IOU's 2025 AFN Plan template • Tables and map • Content, order and flow of all sections of the Concept of Operations • Survey and interview findings located in Appendix D <u>Added</u> • Areas of focus in 2025 within the Concept of Operations • Customer Assistance Programs • Table 3. 2025 PSPS AFN Outreach Tactics and Initiatives • Table 4. PacifiCorp's PSPS AFN Notification Plan • New positions and responsibilities • Required training for ECC personnel • PacifiCorp's Wildfire Advisory Board roster to Appendix A which includes other AFN advisory groups	January 31, 2025
All	Various PacifiCorp Personnel	<u>Updated</u> • Section 1 to align with Joint IOU AFN Council recommendations, as relevant to PacifiCorp • Section 2 concept of operations descriptions and areas of focus for 2026 • Tables and map • Advisory Group rosters located in Appendix A • Wildfire Advisory Board slide decks located in Appendices B and C • Survey and interview findings located in Appendix D	January 31, 2026