

Docket:	:	<u>R.18-12-005</u>
Exhibit Number	:	<u> </u>
Reference Number	:	<u> </u>
Commissioner	:	<u>M. Batjer</u>
ALJ	:	<u>M. Poirier</u>
Witnesses	:	<u> </u>



PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

**Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions**

**[Order Instituting Investigation on the
Commission's Own Motion on the Late 2019
Public Safety Power Shutoff Events]**

**Cal Advocates PUBLIC Exhibits:
2 through 26 & 28**

San Francisco, California
October 13, 2020

Note: This excludes Cal Advocate Exhibits 01 (Rebuttal Testimony previously served), and Exhibits Cal Advocates 4-C, 16-C, & 17-C, which contain materials identified by PG&E as confidential.

Index of Data Requests

Page	Designation	Data Request	Question(s)	Attachment
001	CalAdvocates-02	007	1-8	
012	CalAdvocates-03	008	1-13	
038	CalAdvocates-04	009	1-11	De-EnergizePowerLines_DR_CalAdvocates_09-Q010Atch01.xlsx
057	CalAdvocates-05	010	1-4	
068	CalAdvocates-06	010	2S	Attachments 01 & 02
086	CalAdvocates-07	020	1-10	
104	CalAdvocates-08	020	1 amended	
110	CalAdvocates-09	021	1-2	
119	CalAdvocates-10	021	2 amended	
123	CalAdvocates-11	022	1-6	
130	CalAdvocates-12	023	1-4	
133	CalAdvocates-13	024	1	
138	CalAdvocates-14	024	1 amended	
143	CalAdvocates-15	025	1-5	
151	CalAdvocates-16	026	1-11	
173	CalAdvocates-17	027	1-10	De-EnergizePowerLines_DR_CalAdvocates_027-Q04Atch02,03,05,09,10.xlsx
221	CalAdvocates-18	028	1-4	
232	CalAdvocates-19	028	2 amended	
235	CalAdvocates-20	028	3 amended	
238	CalAdvocates-21	028	4 amended	
242	CalAdvocates-22	029	1-5	De-EnergizePowerLines_DR_CalAdvocates_029-Q01Atch01.xlsx
253	CalAdvocates-23	029	1 amended	De-EnergizePowerLines_DR_CalAdvocates_029-Q01Atch01.xlsx, Amendment 1
261	CalAdvocates-24	030	1-3	
269	CalAdvocates-25	033	1	

Index of Other Documents

Page	Designation	Document
274	CalAdvocates-26	PG&E SPID/Account Follow-Up Response - October 9, 2020
N/A	CalAdvocates-27	October 18th PSPS Emergency Meeting Transcript (see link below) https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2019/101819_PSPS%20Meeting_full.pdf
280	CalAdvocates-28	Red Flag Warning for Marin County - June 28-29, 2019

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 007-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 007-Q01		
Request Date:	March 5, 2020	Requester DR No.:	007
Date Sent:	March 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Rajesh Arora	Requester:	Lucy Morgans

QUESTION 01

During the de-energization events that took place in October 2019, what percentage of web traffic on PG&E's website was caused by exogenous circumstances such as 3rd party redirections, bot traffic, and out of state requests?

- a. Please describe, quantify, and provide the multiplier effect arising from this 3rd party direction of visitors to PG&E's website
- b. Describe any analysis PG&E undertook to understand the impacts of third-party redirections in advance of the October 2019 de-energization events?

ANSWER 01

PG&E uses Adobe Analytics to track certain activities on its website. Adobe tracks referral traffic for those users that were successfully served content but not for those users that received "page not found." Therefore, the percentages of visitors to PG&E's website from exogenous circumstances, namely visitors redirected from third party websites or visitors from outside of California, are shown only for users who successfully accessed content on PGE.com. PG&E does not have a bot traffic report.

Oct 5	Oct 9	Oct 22	Oct 26
14%	26%	17%	18%

- a. PG&E objects to this request as vague and ambiguous because it does not define the phrase "the multiplier effect."
- b. PG&E did not conduct any specific analysis to estimate the impact of third-party redirections in advance of the October 2019 de-energization events.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_007-Q02		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_007-Q02		
Request Date:	March 5, 2020	Requester DR No.:	007
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Rajesh Arora	Requester:	Lucy Morgans

QUESTION 02

PG&E characterizes 80% Central Processing Unit (CPU) load as the threshold at which server performance issues begin to become evident. What does this translate to in terms of website visitors per hour?

- a. Please provide details of any forecasts for the number of website visitors and CPU load associated with the October 2019 de-energization events that were made beforehand?
- b. Describe the method PG&E uses for identifying and mitigating the risk from “bot” traffic and cyberattacks such as denial of service (DDoS)?

ANSWER 02

PG&E objects to this request to the extent that it assumes that CPU load can be translated in terms of website visitors per hour. The CPU load associated with each individual user’s visit to the website depends on the type and the number of transactions that the user performs during his or her visit and can vary widely between different users. For example, a user who downloads maps or accesses other large files can cause significantly larger CPU load in comparison to a user who visits a static page.

- a. PG&E did not utilize a specific estimation prior to October 2019, as to the “number of website visitors and CPU load associated with the October 2019 de-energization events.” Each PSPS event is unique and the scope is dependent upon constantly changing weather conditions and other factors, all of which influence the number of customers that will be affected during a PSPS outage. Further, the number of visitors and the CPU load experienced during a PSPS event does not directly correlate with the total number of customers that are de-energized over the course of a PSPS event. The CPU usage and the number of visitors that the website will experience will depend on a number of factors, including the number of customers de-energized at a given time, the extent to which third-party web traffic is directed to the PG&E website, etc. Please also refer to PG&E’s prepared Testimony Chapter 4 at 4-8, line 17 to 4-9, line 25.
- b. PG&E utilizes a “defense in depth strategy” to protect the company website (pge.com) and the features/functionality available on the website. The first layer of defense is a Content Delivery Network (CDN) provided by the vendor Akamai. This solution caches pge.com content and serves the content directly to the end user

without the need to retrieve the content from PG&E servers in PG&E data centers. This solution greatly reduces the load on PG&E servers resulting in better stability and performance. Another layer of defense is the PG&E web application firewall (provided by the vendor F5) that is positioned in front of the pge.com servers in the PG&E data center. The web application firewall has a variety of security features including attack detection/blocking and bot detection/blocking. PG&E is able to utilize the web application firewall to detect and respond to a variety of unwanted and malicious traffic resulting in a more resilient/secure pge.com website. The final layer of defense is a distributed denial of service (DDoS) monitoring and mitigation service that is provided by the vendor F5. This service provides real time monitoring and alerting for DDoS type attacks. If the pge.com website does come under a DDoS attack, we are able to quickly re-route traffic to the F5 data center for scrubbing. Once the traffic is scrubbed and malicious/unwanted traffic is removed the clean traffic is re-routed to the PG&E data center where pge.com servers can serve up the desired content.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_007-Q03		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_007-Q03		
Request Date:	March 5, 2020	Requester DR No.:	007
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Rajesh Arora	Requester:	Lucy Morgans

QUESTION 03

Please answer the following:

- a. When was the decision made to transfer key functions of PG&E's website to cloud based networks?
- b. Did PG&E consider this transfer prior to the October 2019 de-energization events? If so, please explain why PG&E did not implement the cloud-based network solution prior to the de-energization events in October 2019.

ANSWER 03

- a. PG&E moved PSPS files download for Partners to a Cloud-based infrastructure on October 9, 2019 at 8:20 am. PG&E moved Area Map Lookup function to ESRI infrastructure on October 9, 2019 at 3:00 pm.
- b. Prior to the 2019 wildfire season, PG&E regularly evaluated historical data, which showed that the static content servers had demonstrated a very strong availability metric. In addition, PG&E's static content servers were generally operating at 5 percent or less of their total capacity for the months leading up to the October 2019 event. Further, PG&E's website had not encountered any issues during major storm-related power outages over the recent years, some of which impacted approximately 700,000 customers. Based on these analyses, PG&E believed that it had more than sufficient excess capacity to handle even a large-scale PSPS event. Please also refer to PG&E's testimony at 4-7.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_007-Q04		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_007-Q04		
Request Date:	March 5, 2020	Requester DR No.:	007
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Shawn Holder	Requester:	Lucy Morgans

QUESTION 04

Has PG&E conducted a review of the accuracy of their address lookup tool from the October 2019 de-energization events? If so,

- a. Provide the results of the review, specifically what percentages of addresses received notification of imminent de-energization but were not de-energized, and vice versa.
- b. Please explain what, if any, improvements have been made to the address lookup tool since October 2019, and state why these changes were not made prior to the October 2019 de-energization events.

ANSWER 04

PG&E objects to this data request on the grounds that it assumes facts not in evidence; namely, that the information in the Address Look-up Tool is separate and distinct from the information used to determine the scope of a PSPS event. In fact, as explained in PG&E's testimony, p. 2-7, lines 19-27; p. 2-8, Figure 2-2; p. 3-9, line 16 to p. 3-10, line 9; and PG&E's response to JLG-1, Question 5, the PSPS Viewer is the tool that PG&E uses to identify the circuits, premises, and facilities potentially impacted by a PSPS event. The PSPS Viewer is the common source of data for PG&E's Address Look-up Tool, the affected customers lists (including Medical Baseline customers), and PSPS maps.

Subject to and without waiving this objection, PG&E provides the following responses.

- a. No, PG&E has not conducted a review of the "accuracy" of its Address Look-up Tool relative to the actual scope of de-energization for the reasons provided in the objection above.
- b. PG&E has not modified the Address Look-up Tool for "accuracy" purposes because, for the reasons provided above, no such modifications are necessary. As stated in PG&E's testimony, p. 4-13, lines 10-18, after the October 9-12 PSPS event, PG&E did move the Address Look-up Tool to a web-based cloud in AWS to meet future spikes in website traffic.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_007-Q05		
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Request Date:	March 5, 2020	Requester DR No.:	007
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Shawn Holder	Requester:	Lucy Morgans

QUESTION 05

If PG&E has not reviewed the accuracy of their address lookup tool following the October 2019 de-energization events, then please answer the following questions:

- a. Please explain why PG&E has not reviewed the accuracy of its address lookup tool following the 2019 de-energization events including explaining whether PG&E contends that such an evaluation is not necessary given the events of the 2019 de-energization events, whether PG&E does not believe such an evaluation is a priority before any 2020 de-energizations, or whether PG&E expects to use a different tool or not use such a tool at all, etc.

ANSWER 05

Please see response to Question 04.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_007-Q06		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_007-Q06		
Request Date:	March 5, 2020	Requester DR No.:	007
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Shawn Holder	Requester:	Lucy Morgans

QUESTION 06

Please answer the following:

- a. Why did PG&E establish a “buffer zone” on de-energization maps provided to local governments, public safety partners, and critical facilities, making the size of the de-energization area appear larger than what PG&E actually implemented?
- b. How did PG&E communicate the expanded, “buffered” methodology to the secure web portal participants?
- c. Has PG&E held meetings with participants of the secure web portal to determine best practices for communication of de-energization updates over the secure web portal? If so, please provide any decisions made at these meetings, identify the participants at the meetings, and when the meetings were held.
- d. Is PG&E still using the same buffer zone in its mapping of de-energized areas? If so, please provide details and the reasoning for maintaining this approach.

ANSWER 06

- a. The “Generalized Polygon” maps that PG&E created during the fall 2019 PSPS events were developed in response to discussions with the Governor’s Office of Emergency Services (Cal OES) and other utilities. Specifically, in an October 2018 “Joint Letter,” Cal OES, CalFire and the CPUC provided California utilities with data sharing requirements for PSPS events. On February 19, 2019, following up on that later, PG&E began participating in a series of meetings hosted by Cal OES that also included Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E).

During these meetings, discussion focused on mapping and data products developed and shared with Cal OES during PSPS events in 2018 and areas for improvement. A primary goal was to share best practices and standardize a mapping format that was aligned with input and guidance from Cal OES. As of the time of these meetings, PG&E had shared only “Buffered Circuits” maps with Cal OES and other approved agencies. A “Buffered Circuit” shows at a circuit-by-circuit level the primary electric distribution lines that PG&E expects to de-energize, plus a 100-foot “buffer” on either side of the line. SCE, on the other hand, had developed a

methodology that transformed linear electric distribution circuit information into approximate outage boundary areas. This process for developing outage boundary polygons was subsequently described as “generalizing the polygons.”

Cal OES requested during the course of this dialogue that PG&E also develop a “Generalized Polygon” map that would show the approximate outage boundaries. With Cal OES’s approval, PG&E utilized the SCE mapping methodology to create its Generalized Polygon maps. PG&E then made the Generalized Polygon maps available to public safety partners, including local governments.

- b. When PG&E posted the Generalized Polygon maps to the Secure Data Portal for local governments to access, PG&E included a statement that advised viewers of the nature of the maps and the purposes for which they would be most helpful. The “Read Me” guidance included in the Secure Data Portal describes the maps as “[g]eneralized polygons that capture a larger area in proximity to circuits. These areas can overestimate actual impact areas but can help agencies in estimating population impacts and support resource planning.”
- c. For a discussion of PG&E’s meetings with public safety partners and with respect to the Secure Web Portal in preparation for the 2020 wildfire season, please see, inter alia, Corrective Actions 2.a, 3.a, and 3.b of PG&E’s Bi-Weekly Report in Compliance with January 30, 2020 Assigned Commissioner’s Ruling (Mar. 9, 2020), and Sections 3.1 and 4.2.3 of PG&E’s Progress Report on Implementation of De-Energization Guidelines (Mar. 4, 2020).
- d. PG&E is currently working to develop updated PSPS mapping capabilities to reflect parcel-level information. PG&E expects to produce parcel-level PSPS maps in 2020.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 007-Q07		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 007-Q07		
Request Date:	March 5, 2020	Requester DR No.:	007
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Lori Geoffroy	Requester:	Lucy Morgans

QUESTION 07

What actions did PG&E take to update their non-English web content during the October 2019 de-energization events? Please explain if, and why, any updates were made less frequently than the English web content.

ANSWER 07

Based on the Phase 1 Guidelines, PG&E developed a plan to create in-language pages at the beginning of each PSPS event, listing impacted counties and a toll-free phone number where users could obtain in-language information. After the September 2019 PSPS event, based on feedback received from CforAT, PG&E restructured its pages to make it easier to provide in-language updates more quickly. For the October 2019 PSPS events, PG&E translated content for all phases of the PSPS events to Spanish, Chinese, Vietnamese, Tagalog, Korean, and Russian. PG&E also engineered data tables so that they could be updated simultaneously across these seven languages.

Updates were made to in-language pages every time they were made to English pages.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_007-Q08		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_007-Q08		
Request Date:	March 5, 2020	Requester DR No.:	007
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Lori Geoffroy	Requester:	Lucy Morgans

QUESTION 08

Please describe what processes or policies PG&E had in place during the October 2019 de-energization events for logging and responding to the following:

- a. Suggestions/ tipoffs about misinformation,
- b. Out of date information; and
- c. Flawed information on its website from parties external to PG&E (e.g. community members, customers, local governments, etc).

ANSWER 08

PG&E objects to this data request on the grounds that it assumes facts not in evidence; namely, that PG&E provided “misinformation,” “out of date information,” or “flawed information” to its customers and public. Subject to and without waiving this objection, PG&E provides the following response.

As described in PG&E’s testimony, p. 4-2, lines 4-6 and p. 4-5, lines 5-24, PG&E’s Digital Strategy team used a variety of means, such as customer comments, click data, page visit data, and session reply tools, to obtain feedback about its website.

In addition, as described in PG&E’s testimony, p. 2-6, lines 28-31 and p. 4-17, lines 19-20, PG&E’s EOC Command Staff includes both a Liaison Officer (who leads the Liaison team, which is responsible for interfacing with and responding to feedback from PG&E’s county partners), a Public Information Officer (who is responsible for interfacing with media to field questions they may have), and a Customer Strategy Officer (who leads the Customer Strategy team, which is responsible for interfacing with and responding to feedback from PG&E’s customers).

Furthermore, PG&E added the following in response to improving data quality during de-energized events:

- Created a new team during the October and November 2019 PSPS events to lead the intake process for data quality discrepancies identified by the Emergency Operations Center (EOC). The team will serve as a point of contact for the EOC to provide investigative, resolution, and causal analysis support for

data quality issues identified during a de-energization event. The team will coordinate with data owners to resolve identified issues as quickly as possible.

- Offered CAL OES and counties, onsite or remote “GIS analyst” support during the October and November 2019 PSPS events. This support also served as an identification and intake mechanism for any data issues.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_008-Q01		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_008-Q01		
Request Date:	March 5, 2020	Requester DR No.:	008
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Mark Quinlan	Requester:	Lucy Morgans

THE DURATION OF A DE-ENERGIZATION EVENT

QUESTION 01

Fully describe the key factors that influence the duration of a de-energization event (including phasing of the event)

ANSWER 01

Please see PG&E's testimony at pp. 2-8, which describe PG&E's process for de-energization and issuing the All Clear, including description of the restoration process.

In summary, the key factors influencing the duration of de-energization are (1) the weather start time, (2) weather end time, and (3) day-light hours required for patrol and restoration, including time required for potential repairs resulting from damage or the clearing of hazards found during patrols.

Phasing of a de-energization event is typically based on the factor of weather start time relevant to geographic areas of the system. Phases (i.e., Time Periods) were created as a part of the operational planning of an event so the de-energization start time could be tailored to the weather start time.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_008-Q02		
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Request Date:	March 5, 2020	Requester DR No.:	008
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Mark Quinlan	Requester:	Lucy Morgans

THE DURATION OF A DE-ENERGIZATION EVENT

QUESTION 02

Given that the duration of each de-energization event would affect how a typical residential or commercial customer would plan ahead of the de-energization event,

- a. What steps did PG&E take to estimate the exact duration of each de-energization event in 2019?
- b. What steps did PG&E take to estimate the range of the duration of each de-energization event in 2019?
- c. What steps did PG&E take to estimate the exact duration for each phase of each de-energization event in 2019?
- d. What steps did PG&E take to estimate the range of the duration for each phase of each de-energization event in 2019?
- e. What factors informed PG&E estimate of the exact duration of each de-energization event in 2019?
- f. What factors informed PG&E estimate of the range of the duration of each de-energization event in 2019?
- g. What steps did PG&E take to inform each customer about:
 - i. The exact duration of each de-energization event in 2019?
 - ii. The range of the duration of each de-energization event in 2019?
- h. Which division(s) in PG&E were responsible for conducting the studies over the duration of any 2019 de-energization event?
- i. Which division(s) in PG&E were responsible for determining the duration of any 2019 de-energization event?
- j. Describe any work undertaken by PG&E to assess the accuracy of its estimates of the exact duration of each de-energization event in 2019 and the range of the duration of each de-energization event in 2019.
- k. Describe any measures that PG&E took to improve the accuracy of its estimates of the exact duration of each de-energization event in 2019 and the range of the duration of each de-energization event in 2019.

ANSWER 02

PG&E objects to this data request on the grounds that it assumes facts not in evidence; namely, that a “typical” customer would and should change their level of preparation based on the estimated duration of a PSPS event.

In fact, as PG&E’s website¹ states: “Because extreme weather can last several hours or days, we suggest preparing for outages that could last longer than 48 hours. Take action now to be prepared.” In other words, the most important ways to prepare for a PSPS event – such as updating their contact information, creating a safety plan, planning for backup power (as needed), preparing an emergency supply kit with enough water and nonperishable food to last a household for one week, having charged devices – should be done in advance of wildfire season and regardless of whether a PSPS event is forecasted to last a few hours or a few days.

Subject to and without waiving this objection, PG&E provides the following responses.

- a. As described in PG&E’s testimony, p. 3-18, line 1 to p. 3-19, line 20, the content of PG&E’s customer notifications in 2019 typically included an approximate timeline for the potential PSPS event including when it could be initiated and the expected duration range of restoration after weather has passed. PG&E did not estimate “exact durations” for purposes of customer notifications in 2019.
- b. Please see the answer to Question 1, which includes reference to PG&E’s testimony that describes PG&E’s process for de-energization and issuing the All Clear, including description of the restoration process. Duration ranges communicated by PG&E in 2019 were based on these factors and steps.
- c. See response to subpart a, above.
- d. See response to subpart b, above.
- e. See response to subpart a, above.
- f. See response to subpart b, above.
- g. See responses to subparts a and b, above. See also discussion of customer notifications process in PG&E’s testimony, Chapter 3.
- h. PG&E objects to this data request on the grounds that it assumes a fact not in evidence; namely, that PG&E “conduct[ed]...studies over the duration” of its 2019 PSPS events. Subject to and without waiving this objection, please see response to subpart b, above.
- i. As stated in PG&E’s testimony, p. 2-10, line 14 to p. 2-11, line 30, the decisions to initiate a PSPS event and to issue an “all clear” are made by the Officer in Charge (OIC), with input from PG&E’s meteorology team and other EOC team members.
- j. PG&E objects to this data request on the grounds that it assumes a fact not in evidence; namely, that PG&E conducts after-the-fact work to assess the “accuracy” of their PSPS event duration range estimates. Subject to and without waiving this objection, please see responses to subparts a and b, above.

¹ https://www.pge.com/en_US/safety/emergency-preparedness/natural-disaster/wildfires/outage-readiness.page?WT.pgeac=Home-pod_WildfireReady-Mar20

k. See response to subpart j, above.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 008-Q03		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 008-Q03		
Request Date:	March 5, 2020	Requester DR No.:	008
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Megan Ardell	Requester:	Lucy Morgans

CONTACT INFORMATION

QUESTION 03

On Page 3-3 of its opening testimony, PG&E states that it sent every electric customer “a request to update contact information.” With regard to the de-energization events that took place from October 9 to 12, from October 23 to 25, and from October 26 to November 1:

- a. Please explain how effective this request was in updating the contact information for each customer? Please provide evidence.
- b. What actions did PG&E take for those customers who had not updated their contact information and for whom they did not have contact information? Explain why these actions were taken.
- c. What additional steps does PG&E plan to take to update its customers’ contact information for all future de-energization events?
- d. How many customers does PG&E have no contact information for?
- e. How many customers does PG&E lack up to date contact information for?

ANSWER 03

- a. PG&E objects to this data request on the grounds that it assumes a fact not in evidence; namely, that PG&E is able to track the effectiveness of each type of outreach it conducted prior to the October 2019 PSPS events. Subject to and without waiving this objection, PG&E provides the following response.

As described in PG&E’s testimony, p. 3-7, lines 1-4, as a result of PG&E’s outreach efforts (which included the letters referenced on p. 3-3), PG&E acquired updated contact information for 292,122 PG&E customers in 2019, and had a phone number on file for over 95 percent of its customers in advance of the October 2019 PSPS events.

- b. PG&E objects to this data request on the grounds that it is unduly vague and fails to include a specific timeframe. Subject to and without waiving this objection, PG&E provides the following response.

See PG&E's testimony, p. 3-1, line 20 to p. 3-8, line 18 for a description of PG&E's actions for those customers who had not updated their contact information and for whom they did not have contact information prior to the October 2019 PSPS events, as well as the reasons for those actions. See PG&E's testimony, p. 3-13, lines 5-10 for a description of PG&E's actions after the October 2019 PSPS events to capture accurate and complete contact information from its customers. See also PG&E's second Progress Report on Implementation of De-Energization Guidelines (filed March 4, 2020, in R.18-12-005), pp. 8-12 (customer outreach generally) and pp. 17-19 (outreach to Medical Baseline and AFN customers specifically).

- c. See PG&E's testimony, p. 3-13, lines 5-10 for a description of PG&E's actions after the October 2019 PSPS events to capture accurate and complete contact information from its customers. See also PG&E's second Progress Report on Implementation of De-Energization Guidelines (filed March 4, 2020, in R.18-12-005), pp. 8-12 (customer outreach generally) and pp. 17-19 (outreach to Medical Baseline and AFN customers specifically). Furthermore, PG&E has just issued the following two versions of direct mail postcards to customers with incomplete contact information on file:
1. Customers that were de-energized in 2019 PSPS events, but did not have any contact information on file during those events (excluding those that have updated their contact information since those events took place). See figure 1 below.
 2. Customers that were not previously impacted by 2019 PSPS events, however, remain without complete contact information (either no contact information at all, or email only). See figure 2 below.

Figure 1. Postcard mailed to customers impacted by PSPS events without complete contact information

Figure 2. Postcard mailed to customers without complete contact information on file (and were not impacted by a PSPS event)

- d. PG&E objects to this data request on the grounds that it assumes a fact not in evidence; namely, that there are customers for which PG&E has "no contact

information.” In fact, PG&E has contact information (physical address) for all of its customers. As of March 3, 2020, PG&E has 66,558 customers¹ without a primary phone or email on file, which is 1.4% of all customers (4.71 million) based on the noted criteria. Of this count, 99 are medical baseline customers, which is 0.05% of all currently enrolled medical baseline customers (192,824).

- e. PG&E objects to this data request on the grounds that it assumes a fact not in evidence: namely, that PG&E can verify whether a customer’s information is “up to date.” PG&E knows whether it has contact information for its customers, but it cannot verify that such information is “up to date.”

¹ Customers included are at the person ID level and includes electric only, as well as dual fuel customers (excluding gas only customers).

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 008-Q04		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 008-Q04		
Request Date:	March 5, 2020	Requester DR No.:	008
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Shawn Holder	Requester:	Lucy Morgans

CONTACT INFORMATION

QUESTION 04

PG&E states on page 3-16 of its OSC testimony that:

“Another significant challenge that PG&E faces in developing lists of affected customers is that there are instances in which PG&E’s systems will show a customer’s Service Point Identification (SPID) number as linked to one circuit 8 when in fact the customer is linked to a different circuit. This mapping issue affected approximately 900 customers during the October 2019 event...If a customer’s SPID location is mapped to an incorrect transformer, the system will not identify it as affected by the de-energization of the facility to which the SPID is actually linked, and the customer will not be included on notification lists. When PG&E identifies issues with individual SPID locations, it has a process for correcting the inaccurate linkage, but it was not able to identify and correct all of these errors in advance of the 2019 PSPS events. PG&E is currently undertaking significant data quality and cleanup efforts to address the transformer mapping and customer mapping issues.”

- A) In relation to the above, please confirm the progress associated with addressing the challenges associated with developing a list of affected customers and explain the current state of that progress. Please specifically include the progress associated with resolving the locational issues associated with a customer’s Service Point Identification (SPID) number as identified above.
- B) How will PG&E ensure that it will overcome this challenge (as described above) by the next PSPS event this year?

ANSWER 04

- A) PG&E confirms that it is making progress to address the issue described in the testimony excerpted above. PG&E is utilizing an ensemble of techniques in order to identify and resolve customers who are assigned to the incorrect distribution transformer. These techniques are based on a literature review of best practices, as well as outreach to other utilities who have also faced this industry-wide problem. A brief description of some of the techniques being developed follows:

- Distant
 - Electrical voltage declines at a known rate given a resistance and distance. Knowing the voltage at the transform, and the designed configuration of the grid at the given location, analysts can determine at what distance voltage would decline below Rule 2 requirements. If the distance from the transformer to the customer's location exceeds this distance, then it is likely that the customer is mis-assigned.
- Outage Inconstancy
 - Outages at the transformer or regulator level will affect all downstream smart meters. By smart meter logs for correlated outages, analysts can identify customers feed by the same upstream device, as well as those customers who are mis-assigned.
- Phasing Inconsistency
 - PG&E's electrical system includes a number of different configurations and voltages. At the distribution customer level one of these differences is single phase versus polyphase (sometimes called three phase). If the documented configuration of customer and linked transformer are not the same, the customer is likely mis-assigned.
- Transformer Loading
 - When system configuration and sensors allow, analyst can add the momentary loading information from all downstream end points and compare this against the loading information for a transformer. A discrepancy after accounting for line losses indicates there may be one or more mis-assigned customers.

When mis-assigned customers are identified via one of these or other methods, PG&E takes a series of steps in order to confirm the misassignment and recommended resolution. One of these steps is tracing the electrical connection using satellite and terrestrial based imagery tools, such as Google Street View. Using such tools, before or instead of physically sending a team to the location in question can dramatically reduce costs, ensuring customer affordability.

The company is targeting significant positive impact on this issue – as well as all root causes of missed customer notifications – by June 1, 2020, and completion by August 1, 2020.

B) PG&E has employed Unify Consulting, a firm that specializes in data quality and governance, to develop and execute on a data quality program focused on resolving all customer contact related PSPS data quality issues (not just service point to transformer mapping) by June 1st. PG&E has also created a new department – Data Strategy, Governance, and Analytics in Electric Operations to learn industry best practices from Unify and apply data quality and governance practices to all Electric Operations data sources. The mission statement for this organization is: through projects with tangible business value, provide Electric Operation leadership and direction on its journey to improving PG&E's data quality, and enhancing the company's ability to make data driven decisions.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
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PG&E Data Request No.:	CalAdvocates_008-Q05		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_008-Q05		
Request Date:	March 5, 2020	Requester DR No.:	008
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Megan Ardell	Requester:	Lucy Morgans

CALIFORNIA LARGE ENERGY CONSUMERS

QUESTION 05

Page 2 of California Large Energy Consumers Association's (CLECA) OSC testimony states that:

"When some CLECA members contacted their PG&E account representatives to ascertain whether they would be interrupted during the PSPS event, their account representatives were unaware of any potential interruption and unable to contact PG&E's Emergency Operations Center (EOC) or any PG&E staff working on the mapping of the PSPS to facilities to determine whether there had been any change to the prior determination that the facilities would not be interrupted."

In response to the above, please:

- a) Explain what actions PG&E has taken to improve the communication internally to ensure that account representatives have the correct and most up to date information on de-energization outages impacting their customers.
- b) Provide evidence that these issues will not arise again.

ANSWER 05

- a) PG&E objects to this data request on the grounds that it assumes facts that PG&E disputes or is unable to confirm based on the statements provided. PG&E was aware of potential impacts to transmission-level customers during the October 2019 PSPS events and developed a process to identify and notify those customers of potential outages. PG&E does not know which CLECA members are being described in the statements provided and has sought such information from CLECA in discovery.

Subject to and without waiving this objection, PG&E provides the following response.

PG&E's Customer Care organization provides account management services for PG&E's large commercial, industrial and agricultural customers. PG&E account managers work closely with these customers – some of whom are served at

transmission-level and are members of CLECA – to empower them to make informed decisions regarding their energy needs.

In the course of PSPS event communications between transmission-level customers and their PG&E account managers, some customers requested additional information or updates about changes to the status or likelihood of de-energization, and there was not always an update or new information available to provide at the time of such request. While some customers were unsatisfied when there was no status change or update available, it was not the case that PG&E account managers were “unable to contact” relevant personnel in the EOC or unaware of potential interruptions.

In preparation for the 2020 wildfire season, PG&E is refining its scoping procedures, enhancing its procedures for outbound automated notifications, enhancing its training for account managers and critical customer leads in the Emergency Operations Center, and automating its process for matching certain asset identification numbers to other necessary associated information. To the extent possible, PG&E is incorporating feedback from its large business customers, including those served at the transmission level, to provide the type and frequency of communication updates that will support their resiliency and preparedness plans. Furthermore, PG&E is currently updating and clarifying communication processes among EOC customer personnel and account managers.

- b) PG&E objects to this request on the grounds that “evidence that these issues will not arise again” is vague and ambiguous and does not accurately reflect the role of procedural controls and risk mitigation efforts. Subject to and without waiving that objection and the objection stated in response to subpart a, above, PG&E provides the following response.

See response to subpart a, above.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 008-Q06		
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PG&E Witness:	Megan Ardell/Mark Quinlan	Requester:	Lucy Morgans

CALIFORNIA LARGE ENERGY CONSUMERS

QUESTION 06

Page 3 of CLECA OSC testimony states that:

“PG&E personnel were either uninformed or unaware of the fact that customers served at transmission voltages would be affected by the October 2019 PSPS events”

“During the PSPS events in October 2019, some CLECA members at transmission voltages were actually interrupted without any notice, despite attempts to determine whether they would lose power”

In response to the above:

- a) Please provide a reason why these large business customers were not provided with any notice ahead of the October 2019 de-energization events despite repeated attempts by the customer to confirm whether they would be impacted.
- b) Please explain what corrective actions have been taken to ensure that this issue is resolved and confirm the status of these corrective actions.

ANSWER 06

- a) PG&E objects to this data request on the grounds that it assumes the accuracy of facts that PG&E disputes or is unable to confirm based on the statements provided. PG&E was aware of potential impacts to transmission-level customers during the October 2019 PSPS events and developed a process to identify and notify those customers of potential outages. PG&E does not know which CLECA members are being described in the statements provided and has sought such information from CLECA in discovery. Subject to and without waiving these objections, PG&E provides the following response.

The reasons for missed customer notifications are specific to the individual circumstances of the particular customers and facilities at issue. If CLECA provides the identities of the customers referenced in its testimony, whom it indicates did not receive notice, PG&E could provide more detailed explanations for why those large customers may not have been adequately notified, if that was in fact the case.

- b) PG&E objects to this request on the grounds that the phrase “this issue” is vague and ambiguous. Subject to and without waiving this objection, PG&E provides the following response.

Please see response to Question 5, subpart b.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_008-Q07		
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PG&E Witness:	Megan Ardell	Requester:	Lucy Morgans

CALIFORNIA LARGE ENERGY CONSUMERS

QUESTION 07

On Pages 3 and 4 of CLECA OSC testimony, it states that:

“After the first PSPS event one CLECA member spent a great deal of time with PG&E personnel verifying that the correct PSPS contact information existed in PG&E’s system for contacting the CLECA member. Yet, PG&E again failed to notify the customer of the subsequent PSPS event when the member was once again interrupted despite the fact that (1) the previous event had demonstrated the customer’s vulnerability to being interrupted and (2) the correct customer contact information was available to PG&E”

In relation to the above:

- a) Explain what actions PG&E took to identify the cause of the above error?
- b) Explain what corrective actions PG&E identified to correct this error. State the progress associated with implementing these corrective actions.
- c) Explain the processes in place during the October 2019 de-energization events to correct customer details?
- d) Explain any changes that have been made to these processes in order to ensure that customer details are updated when the information has been made available to PG&E
- e) Explain what actions PG&E has taken to ensure that all customers directly connected to its transmissions are notified ahead of each de-energization event
- f) Explain what actions PG&E has taken to identify all customers where de-energization without sufficient prior notification could cause a safety issue. Describe the measures put in place to ensure that advance notification is provided to all these customers.

ANSWER 07

- a) PG&E objects to this data request on the grounds that it assumes the accuracy of facts that PG&E disputes or is unable to confirm based on the statements provided.

PG&E does not know which CLECA member is being described in the statements provided and has sought such information from CLECA in discovery. PG&E further objects to this request on the grounds that the phrase “the above error” is vague and ambiguous. Subject to and without waiving these objections, PG&E provides the following response.

The reasons for missed customer notifications are specific to the individual circumstances of the particular customers and facilities at issue. PG&E has sought the identity of the customers referred to in CLECA’s testimony. If CLECA were to share the identities of the customers referenced in its testimony, whom it indicates did not receive notice, PG&E could provide more detailed explanations for why those large customers may not have been adequately notified, if that was in fact the case.

- b) PG&E objects to this request because “this error” is vague and ambiguous. Subject to and without waiving this objection, PG&E provides the following response.

Please see response to Question 5b.

- c) PG&E had a process for obtaining and updating customer contact information in advance of the October 2019 PSPS events, and performed the required outreach to identify primary and secondary contacts for these customers. Among other efforts notably including direct outreach to all assigned customers with facilities served by a distribution or transmission line travelling through Tier 2 or 3 HFTD - PG&E hosted two webinars for transmission-level customers, attended by over 80 participants, and instructed those customers to provide up-to-date contact information for a primary, secondary, and in some cases tertiary contact. Furthermore, when updated contact information was provided during the month of October 2019, it was incorporated into relevant databases to the extent possible.
- d) PG&E objects to this request on the grounds that the phrase “these processes” is vague and ambiguous. Subject to and without waiving this objection, PG&E provides the following response.

Please see response to Question 5b.

- e) PG&E determines on an event-by-event basis which, if any, transmission lines pass through a forecasted PSPS weather event footprint. Once PG&E has identified those transmission lines, and calculated their relative wildfire risk, PG&E determines which lines, if any, should be considered for de-energization. PG&E then conducts power flow assessments in coordination with the CAISO to support compliance with mandatory reliability standards. The power flow analyses also identify which customers and substations will be impacted if a transmission line is taken out of service. This information is used to generate a list of potentially impacted transmission-level customers and facilities. If the weather and risk area change, PG&E may need to rerun its impact studies to determine whether a different set of transmission lines and customers may be affected.

In 2019, PG&E’s notification process for transmission-level customers involved

individualized, customer-specific communications. This personal outreach was often done in coordination with the EOC by account representatives with whom these large customers were accustomed to communicating.

For PG&E's corrective actions going forward, please see response to Question 5b.

- f) PG&E seeks to provide prior notification to all customers. For information regarding PG&E's efforts to provide notification to its customers generally, please see Chapter 3 of PG&E's opening testimony. For information regarding PG&E's efforts to provide notification to its transmission-level customers, please see PG&E's response to Question 7e.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 008-Q08		
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PG&E Witness:	Megan Ardell	Requester:	Lucy Morgans

PG&E COMMUNICATION CAMPAIGNS

QUESTION 08

PG&E mailed or emailed each of its electric customer about the possibility of future de-energization events in May 2019, as described on Page 3-3 of its opening testimony. Did these correspondences (such as the one presented in Exhibit 3A):

- a) Identify the reason why the customers were receiving such notice (e.g., because the customers live in a high fire threat district)? If so, provide evidence.
- b) Identify the potential months when de-energization would likely be necessary for safety precautions? If so, provide evidence.
- c) Identify the potential duration (specifically the maximum number of days) of any de-energization event? If so, provide evidence.

ANSWER 08

- a) As stated in the cited portion of PG&E's testimony (at p. 3-3), PG&E sent a letter or email to "every electric customer" (emphasis added). PG&E did not send letters only to customers living in high fire threat districts.

In the letter (Exhibit 3A), PG&E stated: "Given the growing threat of extreme weather, we want all of our customers to be prepared for power outages" (emphasis added). PG&E's letter further explained: "Because the energy system relies on power lines working together to provide electricity across cities, counties and regions, your power may be shut off, even if you do not live or work in an area experiencing high winds or other extreme weather conditions" (emphasis added).

- b) No, PG&E did not identify the "potential months when de-energization would likely be necessary for safety precautions." As stated in the letter (Exhibit 3A), de-energization may be necessary based on a combination of criteria "such as predictions of strong winds and very low humidity levels, along with critically dry vegetation and on-the-ground observations from field crews." In 2019, those conditions were present from June through November, but weather conditions could vary from year to year.
- c) No, PG&E did not identify "the maximum number of days...of any de-energization event." As stated in the letter (Exhibit 3A), "Because extreme weather can last

several hours or days, for planning purposes, we suggest customers prepare for outages that could last longer than 48 hours.”

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 008-Q09		
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Request Date:	March 5, 2020	Requester DR No.:	008
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PG&E Witness:	Lori Geoffroy	Requester:	Lucy Morgans

PG&E COMMUNICATION CAMPAIGNS

QUESTION 09

Please provide statistics and information showing that PG&E had carried out a successful ad campaign for its various de-energization websites:

- a) What targets did PG&E have for these online ad campaigns?
- b) What were the recorded performances of these online ads campaigns (e.g., ad clicks, ad impressions, etc.)?
- c) Will PG&E take the same approach to ad campaigns in future based on the evidence from b. above? Please explain in full.

ANSWER 09

PG&E objects to this data request on the grounds that it is unduly vague, as the terms “successful” and “various de-energization websites” are undefined. Subject to and without waiving this objection, PG&E provides the following response.

- a) PG&E’s participation in the statewide *Power of Being Prepared* campaign is described at pp. 5-6 of PG&E’s second Progress Report on Implementation of De-Energization Guidelines (filed March 4, 2020, in R.18-12-005). That campaign used a variety of media including radio, digital display banners, digital video, social media and search engine advertising to increase public awareness about emergency preparedness, including PSPS. The following summarizes the types of outreach involved in the 2019 statewide public education and outreach campaign, as well as the associated time period and outcomes.

Table 1. 2019 PG&E-Specific Statewide Public Education and Outreach Campaign Summary and Results

Pacific Gas and Electric Company Territory Outreach Summary		
Type of Outreach	Time Period	Results
Digital Campaign	May 27, 2019 - Nov. 29, 2019	87 million impressions, 0.18% click-through rate
Video completions¹	June 19, 2019 – Nov. 3, 2019	19.5 million

¹ Video completions indicate that viewers watched the entire video and were exposed to the full message. Click through rates are tracked separately.

- b) See response to subpart a, above.
- c) See PG&E's Second Progress Report at pp. 5-12 for a discussion of PG&E's 2020 plans.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_008-Q10		
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PG&E Witness:	Megan Ardell	Requester:	Lucy Morgans

PG&E COMMUNICATION CAMPAIGNS

QUESTION 10

On Page 3-3 of its opening testimony, PG&E mentioned that it provided “a PSPS preparedness checklist brochure to over 1.5 million customers, including all Medical Baseline customers and certain customers in areas most likely to be impacted by a PSPS event. Additionally, PG&E sent tenant education toolkits to ‘master metered’ customers, providing information about PSPS and importance of educating their tenants and notifying them in the case of a PSPS event. Copies of a tenant education flyer were included, with translated versions posted on www.PGE.com/psps.”

- a) Please explain why PG&E believed this approach would be effective in incentivizing its customers to carry out the actions as recommended in its PSPS preparedness checklist brochure, tenant education toolkits, and so on?
- b) Will PG&E take the same approach to preparedness in future based on the evidence from 2019? Please explain in full with reasons for what approach PG&E contemplates.

ANSWER 10

- a) As explained in PG&E’s testimony at p. 3-2, lines 31-33, PG&E knows that emergency preparedness messages benefit from repetition, so its efforts were ongoing and sustained. The PSPS preparedness checklist brochure and tenant education toolkits were just some of the numerous methods PG&E utilized to try to communicate to its customers about the importance of preparing for PSPS events. A full description of PG&E’s communication efforts is provided in Chapter 3 of PG&E’s testimony, as well as pp. 5-19 of PG&E’s second Progress Report on Implementation of De-Energization Guidelines (filed March 4, 2020, in R.18-12-005).
- b) PG&E’s planned communication efforts for 2020 are described at pp. 5-19 of PG&E’s Second Progress Report.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_008-Q11		
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PG&E Witness:	Megan Ardell and Mark Quinlan	Requester:	Lucy Morgans

PG&E COMMUNICATION CAMPAIGNS

QUESTION 11

On Page 3-3 of its opening testimony, PG&E mentioned that it “emailed information about backup power safety and how to evaluate whether a backup generator is needed to over two million customers, including critical facilities.”

- a) How does PG&E propose evaluating the need for back-up generators without any precise information on the duration of each de-energization event in 2019?
- b) How does PG&E propose evaluating the need for back-up generators if only a guess on the range of the duration was given for each de-energization event in 2019 (e.g., the outages would last 2 to 5 days)?
- c) If the duration of a de-energization event is a guess or is a rough estimate, on what reasonable basis can PG&E determine the need for back-up generators against the cost of such generators?

ANSWER 11

- a) PG&E does not propose to evaluate the need for back-up generators, but rather provides information and resources for customers to make their own evaluation based on their specific needs. See, for example, PG&E’s website on back-up power for PSPS events: www.pge.com/backuppower. This site includes the power resilience playbook to help customers walk through backup power considerations, emergency preparedness checklist for businesses, and safety information and resources to shop for backup power to meet their needs. For more detail about the preparedness outreach planned in 2020 for both residential and non-residential customers, see PG&E’s second Progress Report on Implementation of De-Energization Guidelines (filed March 4, 2020 in R.18-12-005).

For a description of the factors PG&E uses to assess the estimated duration of PSPS events, please see response to Question 1 and 2.

- b) See response to subpart a, above.
- c) See response to subpart a, above.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

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PG&E Witness:	Megan Ardell	Requester:	Lucy Morgans

PG&E COMMUNICATION CAMPAIGNS

QUESTION 12

On Page 3-3 of its opening testimony, PG&E mentioned that:

- i. It “hosted three customer-focused webinars and 23 open houses throughout its service area, which were attended by thousands of customers” from May to August 2019;
- ii. It “emailed information about backup power safety and how to evaluate whether a backup generator is needed to over two million customers, including critical facilities” in July 2019;
- iii. It “sent all electric customers with an e-mail address on file another emergency preparedness email. PG&E also provided “a PSPS preparedness checklist brochure to over 1.5 million customers, including all Medical Baseline customers and certain customers in areas most likely to be impacted by a PSPS event. Additionally, PG&E sent tenant education toolkits to ‘master metered’ customers, providing information about PSPS and importance of educating their tenants and notifying them in the case of a PSPS event. Copies of a tenant education flyer were included, with translated versions posted on www.PGE.com/psps” in June 2019; and
- iv. It “sent every electric customer a letter or e-mail with information about the PSPS Program, guidance or emergency preparedness, and a request to update contact information.”
 - a) Does PG&E contend that the actions described from part (i) to (iv) of this question, individually and as a whole, were sufficient in notifying PG&E’s customers affected by the past de-energization events in 2019?
 - b) If yes, please provide supporting argument and data.
 - c) If not, describe PG&E’s plans, in terms of communicating to the general public or public outreach, for future de-energization events?
 - d) Please confirm if PG&E will be taking any performance improvements identified in the response (c) above in preparation for the 2020 wildfire season. If not, please explain.

ANSWER 12

- a) PG&E objects to this request on the grounds that the phrase “were sufficient in notifying PG&E’s customers” is vague and ambiguous. Subject to and without waiving this objection, PG&E responds as follows.

PG&E contends that the significant actions described in pages 3-1 through 3-8 of its testimony were appropriate steps to educate customers about the PSPS Program. As described in page 3-12 to 3-13 of PG&E’s testimony, missed contact information was the single biggest cause of mis-directed notifications, and PG&E is focusing significant direct outreach efforts to capture accurate and complete contact information going forward. For additional detail about PG&E’s customer communications efforts in 2019, please see Section 3 of PG&E’s first and second Progress Report on Implementation of De-Energization Guidelines (filed September 4, 2019 and March 4, 2020, respectively, in R.18-12-005).

- b) Please see response to subpart a, above.
- c) Not applicable.
- d) For a discussion of efforts that PG&E will make to educate customers in preparation for the 2020 wildfire season, please see Section 3 of PG&E’s Second Progress Report, and response to question 3c.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
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Request Date:	March 5, 2020	Requester DR No.:	008
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:	Megan Ardell	Requester:	Lucy Morgans

PG&E COMMUNICATION CAMPAIGNS

QUESTION 13

On Page 3-3 of its opening testimony, PG&E mentioned that it “hosted three customer-focused webinars and 23 open houses throughout its service area, which were attended by thousands of customers” from May to August 2019. How does this figure (“thousands of customers”) compare to the number of customers affected by all the de-energization events that took place in 2019? Please provide supporting data.

ANSWER 13

PG&E objects to this data request on the grounds that it is overly argumentative and takes a single statement out of context. Subject to and without waiving this objection, PG&E provides the following response.

The number of customers that attended PG&E’s CWSP-focused open houses and webinars is a fraction of the customers that were de-energized during 2019 PSPS events. As described in Chapter 3 of PG&E’s testimony, in addition to the webinars and open houses that were attended by thousands of PG&E’s customers, PG&E undertook extensive, multi-channel efforts to educate the public about PSPS preparedness. Other efforts described in PG&E’s testimony include:

- Participating in the statewide “Power of Being Prepared” campaign that included more than 36,000 radio advertisements with more than 276 million impressions (PG&E testimony, p. 3-2, lines 11-29); and
- Prior to September 2019, PG&E’s own direct outreach programs included sending over 5 million direct mail pieces and over 11 million emails to customers and prompting every customer who called a PG&E contact center to verify their contact information, resulting in over 6 million reminders (PG&E testimony, p. 3-3, lines 23-25 and p. 3-5, lines 19-22).

For more data supporting the breadth of PG&E’s outreach to customers in advance of the October 2019 PSPS events, please see both of PG&E’s progress reports:

1. See Section 3 of PG&E’s first Progress Report on Implementation of De-Energization Guidelines (filed September 4, 2019, in R.18-12-005).

2. See Section 3 of PG&E's second Progress Report on Implementation of De-Energization Guidelines (filed March 4, 2020, in R.18-12-005).

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_009-Q01		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_009-Q01		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

PG&E's Violations of Regulations

QUESTION 01

With respect to the October 2019 de-energization event, please explain why did PG&E contend that it did not violate each of the following:

- a. Public Utilities Code 451,
- b. Decision 19-05-042, and
- c. Resolution ESRB-8?

Please support the argument with facts and references to PG&E's Opening Testimony dated February 5, 2020.

ANSWER 01

PG&E objects to this data request on the grounds that it calls for legal argument, which is the purpose of briefs, rather than statements of fact, which is the purpose of testimony and data responses.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_009-Q02		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_009-Q02		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 16, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Safety-Related Incidents during PG&E's 2019 PSPS Events

QUESTION 02

During the de-energization events in October 2019, did ignitions take place in the deenergized areas during de-energization or re-energization stages? If yes, please state the date(s), location(s), and safety impact of such ignition(s).

ANSWER 02

PG&E objects to this data request on the grounds that the phrase “safety impact of such ignition(s)” is unduly vague. Subject to and without waiving this objection, PG&E provides the following response.

During the October 2019 PSPS events, one ignition¹ took place in the de-energized area. That ignition occurred on October 10, 2019, on the HALF MOON BAY 1102 circuit. The ignition resulted in a small fire at the base of a pole limited to <.25 acres, with no impacts to personnel or the public.

¹ PG&E's response is based on “reportable ignitions” as defined in CPUC Decision 14-02-015.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_009-Q03		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_009-Q03		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Costs Associated with PG&E's 2019 PSPS Events

QUESTION 03

How does PG&E propose to reimburse its customers for any of their non-recoverable costs or losses (financial or productivity) associated with the October 2019 de-energization events?

ANSWER 03

On October 29, 2019, PG&E issued the following statement:

As the Governor has requested, we will credit residential customers \$100 and business customers \$250. This will be in the form of a one-time on-bill credit (listed as a customer satisfaction adjustment) for customers who were impacted by the Oct. 9 PSPS.

PG&E does not have any other proposal to reimburse its customers for costs or losses associated with the October 2019 PSPS events.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 009-Q04		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 009-Q04		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Costs Associated with PG&E's 2019 PSPS Events

QUESTION 04

Pages 7 to 9 of the testimony submitted by the City of San Jose lists out the resources expended, cost incurred to the city, what those costs were due to the 2019 de-energization events. Page 7 of the City of San Jose's testimony states that:

I am informed and believe that San José spent over \$1 million responding to both October PSPS Events; this figure does not include the personnel hours spent and equipment purchased before the October PSPS Events. Almost every city department in San José contributed personnel for these efforts, the equivalent of \$1.2 million worth of compensation for time San José employees would have otherwise spent performing their usual jobs as well as for overtime. San José also spent \$58,086 during the October PSPS events on equipment and supplies like batteries, generators, cooling units, portable toilets, light stands, plug strips, and refueling costs to ensure residents did not suffer during the outage.

- a. Please explain how PG&E proposes to reimburse the City of San Jose for the costs associated with the October 2019 de-energization events.
- b. Please explain how PG&E proposes to reimburse the impacted local governments for any costs associated with PG&E's failures to coordinate and provide notice to customers under those local government jurisdictions during the October 2019 de-energization events.

ANSWER 04

Please see response to Question 03.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 009-Q05		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 009-Q05		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Costs Associated with PG&E's 2019 PSPS Events

QUESTION 05

Page 6 of CLECA OSC testimony states that:

During two of the October 2019 PSPS events, a CLECA member faced with no PSPS notification and no information about the possible PSPS event except what it could glean from statements made by its own employees about public media warnings, decided to shut down its operations at considerable financial cost in order to avoid a potentially devastating accident that could be caused by an unannounced power interruption.

- a. Please explain how PG&E proposes to reimburse CLECA members for the financial losses incurred to those members, such as the costs associated to the loss of productivity described above, as a remedy to the October 2019 de-energization events.
- c. Please explain how PG&E proposes to reimburse CLECA members for any costs associated with PG&E's failures to coordinate and provide notice to large industrial customers during the October 2019 de-energization events.

ANSWER 05

Please see response to Question 03.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 009-Q06		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 009-Q06		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

The duration of de-energization events.

QUESTION 06

In terms of the duration of de-energization events:

- a. Explain how a median outage of 65 hours during the October 26 to 29 de-energization event is appropriate to “promote the safety, health, comfort, and convenience of its patrons, employees, and the public”?
- b. Explain how the sum of approximately 164 hours of power outage from October to November 2019 (by combining the median duration of power outage for all de-energization events in 2019) is appropriate to “promote the safety, health, comfort, and convenience of its patrons, employees, and the public”?

ANSWER 06

PG&E objects to this data request on the grounds that it presumes that a “median outage” or “sum of...the median duration of power outages” could ever be demonstrated to meet a standard for public safety and health. Subject to and without waiving this objection, PG&E provides the following response.

As explained in PG&E’s testimony at pp. 2-7 to 2-11, PG&E has a comprehensive program to determine the initial scope of a potential PSPS event, to make every effort to identify the narrowest possible area of impact that is consistent with the PSPS event’s purpose of avoiding catastrophic wildfires, to revise the scope of the possible event both in terms of event magnitude and estimated timing, to ensure that electric assets within scope are de-energized safely, and to promote public safety and involve PG&E crews visually inspecting the key lines within the scope of the PSPS event for potential weather-related damage. In PG&E’s estimation, the time required for re-energization in the October 2019 PSPS events was consistent with its mandate to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 009-Q07		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 009-Q07		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Statistics on Customers Affected by PG&E's 2019 PSPS Events

QUESTION 07

As to the October 9 to 12, 2019 de-energization event:

- a. How many Public Safety Partners were unable to access PG&E's secure data transfer portal? Please state the specific Public Safety Partners and the responsibility of each.
- b. Please clarify whether each medical baseline customer affected by the event an individual, a household or a facility?
- c. What was the call volume of customer communications that attempted to reach PG&E? Please state the timeframe involved.
- d. How many calls was PG&E able to answer and address during this de-energization event? Please state the timeframe involved.
- e. How many calls was PG&E not able to answer and address during this de-energization event? Please state the timeframe involved.
- f. How many calls was PG&E able to answer and address during this de-energization event but last less than ten second each? Please state the timeframe involved.

ANSWER 07

PG&E objects to this data request on the grounds that the questions are unduly vague or request information that is not within PG&E's possession. Subject to and without waiving this objection, PG&E provides the following responses.

- a. PG&E does not know how many Public Safety Partners were unable to access PG&E's secure data transfer portal. As described in PG&E's opening testimony, p. 4-17, lines 4-14, PG&E has not discovered any evidence of an outage to the ESFT Portal that rendered it generally inaccessible. However, during the time that the PGE.com website was inaccessible, users (including Public Safety Partners) who typed the PGE.com address or clicked on a PGE.com link would, as a technical matter, be routed through the PGE.com website, and that effort would have been intermittently unsuccessful.

- b. Medical baseline customers are individuals, but the additional Medical baseline allowance would apply to their applicable household rate plan.
- c. Call volume handled by PG&E's Customer Contact Operations personnel by time period is shown in Figure 5-1 of PG&E's opening testimony.
- d. Information about how many calls was PG&E able to answer during the October 2019 PSPS events (by specific timeframes) is provided in pages 5-7 to 5-11 of PG&E's opening testimony.
- e. Information about the delays in responding to calls during the October 2019 PSPS events (by specific timeframes) is provided in pages 5-7 to 5-11 of PG&E's opening testimony, and specifically in Figures 5-2 and 5-3.
- f. Please see response to subpart e, above.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_009-Q08		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_009-Q08		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Information Regarding PG&E's Website (Availability, Capacity, and Content)

QUESTION 08

On Page 4-7 of its opening testimony, PG&E provided Figure 4-2. This figure lists out the static content web server availability (in percentage) in years 2017 and 2018.

- a. Please define what it means percentage availability (e.g., the percentage number of times that page requests are available, the percentage of hours that page requests are available, etc.).
- b. Please provide the static content web server availability during the following timeframes and define the reported units involved:
 - i. October 9 to 12, 2019;
 - ii. October 23 to 25, 2019; and
 - iii. October 26 to 29, 2019.

ANSWER 08

- a. As described in PG&E's testimony, p. 4-7, lines 6-8, "website 'availability' measures the percentage of time that a website is unavailable, for reasons other than planned outages."
- b. PG&E measures the static content web server availability on a monthly basis and does not capture the increments requested in subparts i through iii. The availability for PGE.COM in the month of October 2019 was 95.71%. The units involved in calculating percent availability are as follows:

Availability: $1 - (\text{number of minutes unavailable} / \text{total minutes in a month}) * 100\%$

October 2019: $(1 - 1,917 / 44,640) * 100\% = 95.71\%$

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_009-Q09		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_009-Q09		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 19, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Information Regarding PG&E's Website (Availability, Capacity, and Content)

QUESTION 09

What was the original capacity (e.g., the maximum number of users or clicks, the maximum page requests per hour, etc.) that PG&E's website could handle on October 8, 2019?

ANSWER 09

PG&E's IT group did not conduct a formal analysis prior to the October 9-12 PSPS event to determine how much total "capacity" the website had in terms of maximum page requests or visitors or transactions per hour. PG&E's IT group, however, believed that the website had sufficient capacity to handle a large scale PSPS event. PG&E's belief was based on, among other things, PG&E's strong historical "availability" metrics for the website (in excess of 99 percent in 2017 and 2018) and the historical CPU utilization data for PG&E's ten frontline static content servers (which showed those servers generally operating at 5 percent or less).

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_009-Q10		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_009-Q10		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 17, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Information Regarding PG&E's Website (Availability, Capacity, and Content)

QUESTION 10

Even if PG&E's website was accessible during the de-energization events in 2019, what information was provided on the website? Please provide cached pages or snapshots of PG&E's webpage during the October 9 to 12, 2019 de-energization event as supporting documentation.

ANSWER 10

PG&E objects to this data request on the grounds that its reference to "de-energization events in 2019" is overly broad, potentially encompassing PSPS events in June and September 2019 that fall outside the scope of the Order to Show Cause. In addition, PG&E objects on the grounds that the requested information changed over time and would be overly burdensome to provide. Subject to and without waiving these objections, PG&E responds as follows.

Please see PG&E's opening testimony, pp. 4-2 to 4-5 for a narrative description of the static content on PG&E's website. In addition, please see the attached screenshots entitled "De-EnergizePowerLines_DR_CalAdvocates_009-Q10Atch01" for examples of the type of static content available on PG&E's website.

The screenshots in the attached show sample content for select key pages including: the PSPS Updates page, the Potential PSPS Outages page (showing the address lookup link and PSPS forecasted area maps), the home page alert box as seen on the pge.com home page (this visual also shows the global alert bar used on almost every page on pge.com). In addition, there is an example of a PSPS overview page as well as the Partners page showing maps used by governments and media.

	10/03/17	To be announced	To be announced	To be announced
	Cities	Total customers impacted (est.)	Medical Baseline customers impacted (est.)	Total customers restored (est.)
	Berry Creek, Brush Creek, Butte Meadows, Butte Valley, Chico, Cohasset, Feather Falls, Forbestown, Forest Ranch, Magalia, Oroville, Paradise, Paradise Pines, Pulga, Stirling City, Yankee Hill	Original: 11,124 Revised: 10,235	Original: 742 Revised: 673	To be announced
	Storrie	Original: 4 Revised: 4	0	To be announced
	Brownsville	Original: 898 Revised: 89	Original: 57 Revised: 6	To be announced

Backup power

Safety Action Center


Community Resource Centers

For customers in the impacted counties, PG&E has opened Community Resource Centers in multiple locations. Please note the closing dates of each center, below.

Centers open at 8 a.m. and remain open during hours noted below. They provide restrooms, bottled water, electronic device charging and limited seating for up to 100 customers each. Mobile resource stations (vans), when available, will provide bottled water, charging and latest information for customers.

	Opening date	Closing date	Hours
Mobile Resource Station Community Center 1000 S. Jerosa Way Redding, CA 95919	10/06/19	To be announced	8 a.m. – 6 p.m.
Community Center 1000 S. Jerosa Way Redding, CA 95919	10/06/19	To be announced	8 a.m. – 6 p.m.
School 1000 S. Jerosa Way Redding, CA 95919	10/06/19	To be announced	8 a.m. – 6 p.m.


pge.com Home Page with Global Header and Current Alert



Public Safety Power Shutoff Announcement

GET CURRENT INFORMATION

CLOSE



RESIDENTIAL

SMALL & MEDIUM BUSINESS

LARGE BUSINESS

EMERGENCIES

SAFETY

CONTACT PG&E

ENGLISH

SIGN IN

SEARCH

YOUR ACCOUNT

CUSTOMER SERVICE

OUTAGES

RATE PLANS

SAVE ENERGY & MONEY

SOLAR & VEHICLES

IN YOUR COMMUNITY

SIGN IN

USERNAME

Forgot Username >

PASSWORD

Forgot Password >

☐ Remember My Username

SIGN IN

REGISTER

VISITOR

Current Alerts

PUBLIC SAFETY POWER SHUTOFF >

WILDFIRE SAFETY RESOURCES>

REORGANIZATION INFORMATION >

050

But if your service may be impacted by a currently announced PSPS

Now provide an overview of possible PSPS impacted addresses and areas as well as where to go for updates once power has been turned off.

If an address will be impacted, we will attempt to call, text or email by using the phone number or email address currently on file for that account.

The Potential PSPS address-lookup map provides **the most accurate information for your address** before your power has been turned off.

The Area map shows a general outline of the impacted area but is **not address specific**.

Once power has been turned off, the [Outage Map](#) will provide the latest restoration times if available.

[Frequently asked questions](#) about these tools.

[Get the latest updates](#) about currently announced PSPS events

Potential PSPS address-lookup map

English (PDF, 141 KB) [中文](#) > (PDF, 186 KB) [TIẾNG VIỆT](#) >(PDF, 189 KB) [TAGALOG NA WIKI](#) > (PDF, 140 KB) [한국어](#) > (PDF, 202 KB) [РУССКИЙ ЯЗЫК](#) > (PDF, 251 KB)

POTENTIAL PSPS ADDRESS

Potential PSPS area map

POTENTIAL PSPS AREA MAP

Frequently asked questions

POWER IS OFF. WHY DOESN'T THE MAP SHOW THAT MY ADDRESS IS IMPACTED?	▼
THE POTENTIAL OUTAGE AREA MAP INCLUDE MY LOCATION, BUT THE ADDRESS LOOKUP SAYS I WON'T BE IMPACTED?	▼
MY ADDRESS DOESN'T APPEAR IN THE DROPDOWN. WHAT DO I DO?	▼
THE MAP SHOWS MY ADDRESS COULD BE IMPACTED, HOW WILL YOU LET ME KNOW IF THERE WILL IN FACT BE A SHUTOFF?	▼
HOW OFTEN ARE THESE MAPS UPDATED?	▼
ONCE POWER IS SHUT OFF, WHEN WILL IT BE RESTORED?	▼

What is a Public Safety Power Shutoff?

For public safety, it may be necessary for us to turn off electricity when gusty winds and dry conditions, combined with a heightened fire risk, are forecasted. This is called a "Public Safety Power Shutoff" or "PSPS."

Customers in high fire-threat areas are more likely to be affected, any of PG&E's more than 5 million electric customers could have a power shutoff. This is because the energy system relies on power lines working together to provide electricity across cities, counties



What to do in the last several days

Work together to help our customers prepare and keep their homes and businesses safe during extreme weather and power outages. Learn more about how to prepare a safety plan.

We need your contact information

Please make sure we have your correct email address, landline and mobile number so we can reach out to you in advance of a public safety power outage, when and where possible.

OUTAGES

UPDATE YOUR CONTACT INFORMATION

How a PSPS works

HOW WILL PG&E DETERMINE THE NEED TO TURN OFF POWER FOR SAFETY?



HOW OFTEN WILL THESE PUBLIC SAFETY POWER SHUTOFFS OCCUR?



HOW WILL I KNOW IF I'M GOING TO BE IMPACTED?



IF I AM A MEDICAL BASELINE CUSTOMER AND/OR I HAVE SPECIAL MEDICAL NEEDS, WILL MY POWER BE SHUT OFF?



How to receive alerts about a PSPS

HOW AND WHEN WILL I BE NOTIFIED IF A SHUTOFF BECOMES NECESSARY?



HOW DO I HAVE TO OPT IN TO THESE ALERTS?



HOW DO I OPT OUT OF THESE ALERTS?



AT WHAT HOURS OF THE DAY WILL THESE ALERTS BE SENT?



Outage and restoration information

PSPS event updates

Outage preparation

Update your contact information

PSPS ZIP Code Alerts (for non-account holders)

Potential PSPS outage maps

Current outages map

PG&E weather awareness

Backup power

Safety Action Center

WILDFIRE SAFETY AND SUPPORT

Wildfire safety

Community Wildfire Safety Program

Wildfire prevention and preparedness

Wildfire recovery support

Vegetation management



Utilities have a joint safety plan

Find out what California's largest energy companies are doing to address the threat of wildfire and Public Safety Power Shutoffs.

VISIT PREPARE FOR POWER DOWN >



Public Safety Power Shutoff

Public Safety Power Shutoff (PSPS) maps

Safety Power Shutoff Announcement

GET CURRENT INFOR

ation for government agencies, first responders and critical facilities

r during a Public Safety Power Shutoff (PSPS) event, potential outage maps will be available to download on this page. Map files will include PDF, KMZ and
more information, [review frequently asked questions](#).

information during an event, [visit the PSPS event page](#).

adable maps not representing a specific PSPS event are available for **planning purposes** on our [PSPS planning maps page](#).

event map files

THE LATEST SHAPE FILES, MAPS AND KMZ FILES

area maps

ve a **general outline** of the impacted area only. It is not address specific and does not include the complete and exact area(s) impacted by a PSPS. For the most
nation for your location, use the [address-lookup tool](#).

OBER 26-27 MAP (APPROXIMATE)

OBER 29 MAP (APPROXIMATE)

ENTLY ASKED QUESTIONS



**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_009-Q11		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_009-Q11		
Request Date:	March 6, 2020	Requester DR No.:	009
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

No advance notification

QUESTION 11

Regarding the customers who were not given advanced notices for the October 2019 PSPS events.

- a. Please provide the customer classes (e.g., industrial, residential, commercial, etc.) for:
 - i. The 23,000 customers who did not receive advanced notice for the October 9 to 12, 2019 PSPS event;
 - ii. The 1,900 customers who did not receive advanced notice for the October 23 to 25, 2019 PSPS event; and
 - iii. The 28,600 customers who did not receive advanced notice for the October 26 to November 1, 2019 PSPS event.
- b. Were all CLECA members included within these customers numbers that did not receive advanced notices from PG&E for the October 9 to 12, 2019 PSPS event?
- c. Please confirm whether any critical facilities were included within these customers numbers that did not receive notification. If so, please state the critical facility's name and responsibility and confirm which de-energization events they did not receive a prior notification for.

ANSWER 11

PG&E provides the following response.

a. The customers have been broken up into the basic customer class below.

i. October 9 to 12, 2019;

Customer Class	Customer Count
Agricultural	100
Commercial/Industrial	2,000
Residential	21,000
California State Government	20
Total	23,120

ii. October 23 to 25, 2019; and

Customer Class	Customer Count
Agricultural	30
Commercial/Industrial	200
Residential	1,800
California State Government	3
Total	2,033

iii. October 26 to 29, 2019.

Customer Class	Customer Count
Agricultural	200
Commercial/Industrial	2,000
Residential	20,000
California State Government	20
Total	22,220

- b. PG&E understands CLECA's members to be large, high load factor industrial customers, so any of their members who failed to receive notice would be included in the Industrial category numbers. PG&E has submitted a data request to CLECA requesting the identification of any members who claim not to have received notice. That data request is still pending.
- c. The attachment named "De-EnergizePowerLines_DR_CalAdvocates_09-Q011Aatch01CONF.xlsx" identifies the list of critical customers who had a service location in the October event for which they were not notified.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_010-Q01		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_010-Q01		
Request Date:	March 6, 2020	Requester DR No.:	010
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

COMPLAINTS AND CLAIMS FILED FOR THE OCTOBER 9 TO 12, 2019 PSPS EVENT

QUESTION 01

The following is an excerpt from Section 9 of PG&E's PSPS Report on its October 9 to 12, 2019 PSPS event:

Section 9 – Number and Nature of Complaints Received

As of October 22, PG&E had received three written, three phone and one e-mail CPUC complaints. These complaints relate to:

- Questions about programs to purchase generators and a request that PG&E pays for the customer's generator;
 - Feedback that medical baseline notifications are too frequent and wanted calls to stop;
 - Questions related to why the power was shut off and when power would be restored;
 - Request for credit during the shut off period;
 - Two complaints that the customer did not receive notifications prior to de-energization; and
 - Feedback that the website did not work during the event.
- a) Please provide the full description of each complaint above.
- b) Please detail the actions PG&E has taken or will take to address and resolve each of the above complaints.
- c) Please provide the status update of each of the complaints above. Specifically, has PG&E resolved each of the complaints? If not, please provide a timeframe by which PG&E will resolve the said complaint.

ANSWER 01

PG&E objects to this data request on the grounds that the phrase “full description” is unduly vague and could be interpreted to seek the disclosure of customer confidential information. Subject to and without waiving this objection, PG&E provides the following response.

- a) Detailed information about each of the complaints described in PG&E’s report for the October 9-12 PSPS event is provided below:
- On 10/9/19, PG&E received a voice message from the CPUC to call a customer who had questions about programs to purchase generators and a request that PG&E pay for the customer’s generator. PG&E Customer Relations advised that we do not have such a program and referred him to the website. No further action was requested. PG&E closed out the complaint. (ID 00317609)
 - On 10/9/19, PG&E received a phone call from a customer who said that medical baseline notifications are too frequent and wanted calls to stop. PG&E Customer Relations advised that, because he is a Medical Baseline customer, we will continue to provide automated notifications to him until he confirmed that he received the communication. PG&E advised him to pick up the phone next time instead of letting it go to the answering machine, and the customer appreciated the information. PG&E provided the CPUC with the investigation details and closed the complaint. (ID 00317625)
 - On 10/10/19, PG&E received an email from a customer who had questions related to why the power was shut off and when power would be restored. PG&E Customer Relations advised that customers may be affected by power shutoff even though they are not experiencing extreme weather conditions in their specific location. Customer wanted to know when we would be restoring power and was advised that once we receive the All Clear we would patrol the area, inspect equipment, and restore power. PG&E provided the CPUC with the investigation details and closed the complaint. (ID 00317776)
 - On 10/18/19, PG&E received a written request for credit during the October 9 shut off period. PG&E Customer Relations attempted to contact the customer on 10/23/19, but the call could not be completed. PG&E sent a letter explaining that PG&E will provide a one-time credit of \$100 for residential customers related to the 10/9/19 outage. PG&E provided the CPUC with the resolution and closed the complaint. (ID 00318547)
 - On 10/22/19, PG&E received a written complaint that a customer did not receive notification of the 10/9/19 PSPS event. PG&E sent a letter explaining that PG&E will provide a one-time credit of \$100 for residential customers related to the 10/9/19 outage. PG&E provided the CPUC with the resolution and closed the complaint. (ID 00318855)
 - On 10/22/19, PG&E received a written complaint that the customer did not receive notifications prior to the last four planned de-energizations. PG&E sent a letter explaining that PG&E will provide a one-time credit of \$100 for residential customers

related to the 10/9/19 outage. PG&E provided the CPUC with the resolution and closed the complaint. (ID 00318899)

- On 10/22/19, PG&E received a phone call expressing concern that the website did not work during the PSPS event. PG&E Customer Relations acknowledged the problems with its website and advised that PG&E was working to improve its system to avoid future congestion. The complaint was closed out. (ID 00318859)

b) See subpart a, above.

c) See subpart b, above.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_010-Q02		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_010-Q02		
Request Date:	March 6, 2020	Requester DR No.:	010
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

COMPLAINTS AND CLAIMS FILED FOR THE OCTOBER 9 TO 12, 2019 PSPS EVENT

QUESTION 02

The following is an excerpt from Section 10 of PG&E's PSPS Report on its October 9 to 12, 2019 PSPS event:

Section 10 - Claims Filed Because of PSPS Event

As of October 21, 2019, PG&E has received 450 claims for the Oct. 9-12 PSPS event. 407 of those claims were residential and 43 were commercial.

- Commercial:
 - 32 business interruption/economic loss
 - 5 property damage with business
 - 3 property damage
 - 3 food loss
 - Residential:
 - 46 economic loss
 - 16 property damage with business
 - 86 property damage
 - 256 food loss
 - 2 unclassified
 - 1 bodily injury
- a) Please provide the full description of each of the claims above.
- b) Please explain why PG&E will not reimburse for the losses of any of the above claim, in addition to the \$100 compensation per residential customer or \$250 compensation per commercial customer as mandated by statutes.
- c) What is the status for each of the claims above?

ANSWER 02

- a) PG&E objects to this data request on the grounds that the term “full description of each of the claims” is unduly vague and could be interpreted to request customer-specific information that is confidential. Subject to and without waiving this objection, PG&E provides the following response. Details regarding claims received as of February 19, 2020, associated with PG&E’s October-November 2019 PSPS events are provided in PG&E’s responses to Data Request SBUA_001 Q01-Q12.
- b) Tariff Rule 14 allows PG&E to shut off power when in its sole opinion it deems it necessary for public safety and states that PG&E may interrupt service without liability.
- c) Please see response to subpart a.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 010-Q03		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 010-Q03		
Request Date:	March 6, 2020	Requester DR No.:	010
Date Sent:	March 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

COMPLAINTS AND CLAIMS FILED FOR THE OCTOBER 23 TO NOVEMBER 1, 2019 PSPS EVENT

QUESTION 03

The following is an excerpt from Section 9 of PG&E's PSPS Report on its October 9 to 12, 2019 PSPS event:

Section 9 - Number and Nature of Complaints Received

From October 23 to November 11, PG&E received 13 written complaints and one e-mail complaint related to PSPS. These complaints are reconciled on a monthly basis and subject to change. These complaints relate to:

- Concern about customers with medical needs not having power;
 - Two complaints that the customer does not agree with the PSPS program;
 - Two complaints that the customer did not receive notifications prior to de-energization;
 - Questions relating to which generators a customer can use;
 - Request for credit during the shut off period;
 - Frustration that the maps on website were not updated during the event; and
 - There are five complaints which are still open and pending resolution.
- a) Please provide the full description of each complaint above.
- b) Please detail the actions PG&E has taken or will take to address and resolve each of the above complaints.
- c) Please provide the status update of each of the complaints above. Specifically, has PG&E resolved each of the complaints? If not, please provide a timeframe by which PG&E will resolve the said complaint

ANSWER 03

PG&E objects to this data request on the grounds that the phrase "full description" is unduly vague and could be interpreted to seek the disclosure of customer confidential

information. PG&E also objects to this data request on the grounds that it cites to PG&E's October 9-12 post-event report but asks about complaints in the October 23 to November 11 timeframe.

Subject to and without waiving this objection, PG&E provides the following response. Please note that, upon closer review, PG&E received 12 written complaints, one e-mail complaint, and one phone complaint (not 13 written complaints and one e-mail complaint, as previously stated).

- a) Detailed information about each of the complaints described in PG&E's reports for the October 23-25 and October 26 & 29 PSPS events is provided below:
- On 10/28/19, PG&E received a phone complaint from a customer who was upset about the power being out and being cold. PG&E Customer Relations called the customer, listened to her concerns, and provided her a Medical Baseline application based on her statement that her husband is on a CPAP machine. The customer thanked PG&E for calling back. PG&E closed out the complaint. (ID 00319367)
 - On 10/31/19, PG&E received a written complaint from a customer who disagrees with the PSPS program because they are not able to benefit from their solar system. Also, on 10/31/19, PG&E received a written complaint from a customer disagreeing with the PSPS program because of the financial burdens. PG&E mailed letters to each customer explaining the PSPS program and provided the CPUC with the investigation findings. PG&E closed out the two complaints. (ID 319838 and 319835)
 - On 11/5/19, PG&E received an email complaint from a customer concerned because she did not receive any notification for the 10/26-10/30 PSPS event. PG&E Customer Relations checked with internal staff and confirmed that notification was received by the customer's cell carrier. PG&E closed out the complaint. (ID 320126)
 - On 11/4/19, PG&E received a written complaint from a customer because the PG&E press release stated that all power had been restored but she was still without power. Also, on 11/4/19, PG&E received a written complaint from another customer who was upset because his power was shut off during the PSPS event, he did not receive notifications, and when he called the call center he received conflicting information. PG&E Customer Relations left a voicemail with the second customer, who called back and left a voicemail saying he is hard to reach. PG&E mailed a letter to each of the customers explaining the PSPS program and provided the CPUC with the investigation findings. PG&E closed out the two complaints. (ID 320051 and 320069)
 - On 11/6/19, PG&E received a written complaint from a customer who was frustrated that PG&E has restored power to most of her neighborhood but not hers and a few others. The customer mentioned a blown transformer. Customer was already restored prior to PG&E receiving the complaint. PG&E Customer Relations reviewed outage history for the customer and determined that the cause of the outage was a pole on the ground and fire. PG&E provided the CPUC with the investigation findings and closed out the complaint. (ID 320324)
 - On 11/6/19, PG&E received a written complaint from a customer who wants to use a specific type of generator. PG&E mailed a letter to the customer advising that the generator's adapters are currently not allowed, but PG&E will begin testing them in

the first quarter of 2020. PG&E provided the CPUC with the investigation findings and closed the complaint. (ID 320363)

- On 11/6/19, PG&E received a written complaint from a customer who was frustrated that PG&E maps were not updated to reflect current outage information during the PSPS Events. PG&E Customer Relations sent the customer a letter regarding the PSPS program and planned improvements. PG&E provided the CPUC with the resolution and completed closure. (ID 320348)
- On 11/8/19, PG&E received a written complaint from a customer who was upset because his power was shut off for 5 days for PSPS and the text he received stated he would not be impacted. PG&E Customer Relations reviewed the customer's outage history on the account and confirmed he had been out of power for 4 days. PG&E Customer Relations called to address the customer's PSPS concerns. The person who answered the phone placed the call on hold and then said the customer no longer lives there and hung up. PG&E provided the CPUC with investigation details and closed the complaint. (ID 320601)
- On 11/8/19, PG&E received a written complaint from a customer who was frustrated because she lost power and her power was not restored immediately. PG&E Customer Relations called on 11/12 and 11/15 and left voice messages acknowledging her concern. Also advised she was dropped from Medical Baseline effective 11/7/2019 due to not receiving a reply to previous letter mailed on 08/09/2019 to re-certify, and mailed application to customer. PG&E Customer Relations left contact phone number should she have any additional questions or concerns. PG&E provided the CPUC with investigation findings and closed the complaint. (ID 320598)
- On 11/8/19, PG&E received a written complaint from a customer who was upset because he received no prior notification to PSPS event and requested better notification process and reimbursement for damage. The 10/9/19 PSPS Event Customer Satisfaction Adjustment of \$100 was applied to his account on 11/01/2019. PG&E mailed a PSPS letter to customer, provided the CPUC with investigation findings, and closed the complaint. (ID 320626)
- On 11/8/19, PG&E received a written complaint from a customer who was upset regarding the PSPS notification process and is requesting detailed information as to when power will be shut off and restored. PG&E Customer Relations reviewed the customer's outage history on the account and mailed PSPS letter to the customer. PG&E provided the CPUC with investigation findings and closed the complaint. (ID 320622)
- On 11/11/19, PG&E received a written complaint from a customer who wanted reimbursement of \$500 for food spoilage during the PSPS Event. PG&E wrote to the customer that, as the Governor has requested, we will credit residential customers \$100 and business customers \$250. This will be in the form of a one-time on-bill credit (listed as a customer satisfaction adjustment) for customers who were impacted by the Oct. 9 PSPS. The customer received the credit on November 1, 2019. PG&E Customer Relations sent a closure letter. (ID 320722)

b) Please see subpart a, above.

c) Please see subpart a, above.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_010-Q04		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_010-Q04		
Request Date:	March 6, 2020	Requester DR No.:	010
Date Sent:	March 13, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

COMPLAINTS AND CLAIMS FILED FOR THE OCTOBER 23 TO NOVEMBER 1, 2019 PSPS EVENT

QUESTION 04

The following is an excerpt from Section 10 of PG&E's PSPS Report on its October 9 to 12, 2019 PSPS event:

Section 10 - Claims Filed because of PSPS Event

As of November 13, 2019, PG&E received 923 claims for the October 26 & October 29 PSPS event. 832 of those claims were residential and 91 were commercial.

- Commercial:
 - 53 business interruption/economic loss
 - 20 property damage with business
 - 8 property damage
 - 10 food loss
 - Residential:
 - 108 economic loss
 - 38 property damage with business
 - 116 property damage
 - 567 food loss
 - 3 bodily injury
- a) Please provide the full description of each of the claims above.
- b) Please explain why PG&E will not reimburse for the losses of any of the above claim, in addition to the \$100 compensation per residential customer or \$250 compensation per commercial customer as mandated by statutes.
- c) What is the status for each of the claims above?

ANSWER 04

Please see response to Question 02 of this set of data requests.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_010-Q02		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_010-Q02Supp01		
Request Date:	March 6, 2020	Requester DR No.:	010
Date Sent:	March 13, 2020 (Original) March 25, 2020 (Supplemental)	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

COMPLAINTS AND CLAIMS FILED FOR THE OCTOBER 9 TO 12, 2019 PSPS EVENT

QUESTION 02

The following is an excerpt from Section 10 of PG&E's PSPS Report on its October 9 to 12, 2019 PSPS event:

Section 10 - Claims Filed Because of PSPS Event

As of October 21, 2019, PG&E has received 450 claims for the Oct. 9-12 PSPS event. 407 of those claims were residential and 43 were commercial.

- Commercial:
 - 32 business interruption/economic loss
 - 5 property damage with business
 - 3 property damage
 - 3 food loss
 - Residential:
 - 46 economic loss
 - 16 property damage with business
 - 86 property damage
 - 256 food loss
 - 2 unclassified
 - 1 bodily injury
- a) Please provide the full description of each of the claims above.
- b) Please explain why PG&E will not reimburse for the losses of any of the above claim, in addition to the \$100 compensation per residential customer or \$250 compensation per commercial customer as mandated by statutes.
- c) What is the status for each of the claims above?

ANSWER 02

- a) PG&E objects to this data request on the grounds that the term “full description of each of the claims” is unduly vague and could be interpreted to request customer-specific information that is confidential. Subject to and without waiving this objection, PG&E provides the following response. Details regarding claims received as of February 19, 2020, associated with PG&E’s October-November 2019 PSPS events are provided in PG&E’s responses to Data Request SBUA_001 Q01-Q12.
- b) Tariff Rule 14 allows PG&E to shut off power when in its sole opinion it deems it necessary for public safety and states that PG&E may interrupt service without liability.
- c) Please see response to subpart a.

QUESTION 02 SUPP 01

PG&E to confirm the confidentiality restrictions in relation to claims and complaints. i.e. if this is restricted to names and addresses only or whether it also covers the justifications of the claims and complaints. By the end of today Cal Advocates would like more detail on the customer's justifications and reasoning associated with each claim and complaint filed.

Email from PG&E counsel to Cal Advocates counsel (Friday, March 20, 2020 4:24 PM)

The majority of PG&E’s claims requests (approx. 60%) are submitted electronically. For those requests, we can re-run a report of our Riskmaster database to include the specific “reason” for each of the claims shown on the original spreadsheet. That report will require approximately 2 business days to run and QC. However, the remaining claims requests (approx. 40%) are submitted non-electronically, and it would be unduly burdensome to go through each of those requests to hand type the specific “reason” for those claims.

If there are specific claims for which Cal Advocates would like more detailed information (e.g., the 5 commercial property damage claims), PG&E would be amenable to doing the manual work to provide that detail. The amount of time needed to provide the additional information would depend on the number of specific claims requested.

Email from Cal Advocates analyst to PG&E (Fri 3/20/2020 4:53 PM)

I'd very much appreciate the database of the ~60% of claims submitted electronically. As for additional asks, I would specifically like to see the 7 residential claims made for bodily injury, totaling to \$1,012,102.00 per the spreadsheet from SBUA's data request that PG&E sent to us yesterday.

ANSWER 02 SUPP 01

As of 2/19/2020, PG&E has received 3,069 claim counts for 2019 PSPS events. Of that population, 2,137 were submitted through online claims.

Enclosed are two spreadsheets that includes the following:

- Details on the 7 residential claims made for bodily injury;
- Details on the first 200 line items of the online claims spreadsheet, with the “reason” redacted for those claims descriptions that include personally identifiable information (PII) (e.g., personal name, business name, address).

The process of reviewing each line item for PII and then redacting that specific information is unduly burdensome. Therefore, PG&E is producing the first 200 line items as representative of the types of claims that it has received. Please see attachments “De-EnergizePowerLines_DR_CalAdvocates_010-Q02Supp01Atch01” and “De-EnergizePowerLines_DR_CalAdvocates_010-Q02Supp01Atch02”.

PSPS Event	vClaimantType	City	Claim Type	Demand	Amount Paid	Reason
October 9-12	Residential	SCOTT VALLEY	Bodily Injury	1.00	0.00	Customer alleges she fell over her dog and into her dresser during a power outage, and as result she hurt her back, shoulder, and arm. I experienced excruciating anxiety, reaching the level of several panic attacks and consideration of suicide due solely and completely to the fact the power, heat, and water were turned off by PG and E in an attempt to save your massive corporation money. In the process you also drastically increased the chance of fires by ensuring most houses were over using generators and there was no access to water to put out fires.
October 9-12	Residential	Nevada city	Bodily Injury	10,000.00	0.00	Power outage triggered a mold/mildew problem at my house that not only ruined most of my clothing and bedding, but got me very ill with bronchitis and pneumonia. I have thousands of dollars in bills for mold remediation, hauling, and replacing ruined contents of my home, including bedding, clothing and much more. There was a gas leak that needed repair at my home on 11/8, and now the looming threats of power outages is creating terrible stress in addition to ongoing threat to my health, home, wellbeing and safety.
October 26-27	Residential	Fairfax	Bodily Injury	1,000,000.00	0.00	Power shutoff in Amador County. This resident uses an oxygen compensator for COPD. These incidents cause an emergency situation when the electricity is out.
October 26-27	Residential	lone	Bodily Injury	1.00	0.00	We where driving home on solano ave about to turn right into Florida the traffic light was not working due to the power outage and streets where pitch dark we made a stop at the non working light and as we where waiting for another car to pass that had gotten their before us we got hit from the back by a truck that was driving fast and didnt see us I had to be transported via ambulance to the er and now due to my injury I wont be able to work for a week or even more
October 29 - November 1	Residential	Vallejo	Bodily Injury	1,300.00	0.00	PG&E Turned off our power for 5 days. i tripped in the dark when I came home the first day to no power because we were out of town and did not know power was off. I hurt my back pretty bad, i have had back injury in past and missed two days of work due to pain. also loss over 500 in food.
October 29 - November 1	Residential	Ukiah	Bodily Injury	800.00	0.00	Customer alleges she fell as she was looking for a candle and flashlight; She has contusions all over neck, back and arms.
October 29 - November 1	Residential	ANDERSON	Bodily Injury	1.00	0.00	

vClaimantType	Division	Claim Number	Reason
Residential	Sierra	A19133093	I experienced excruciating anxiety, reaching the level of several panic attacks and consideration of suicide due solely and completely to the fact the power, heat, and water were turned off by PG and E in an attempt to save your massive corporation money. In the process you also drastically increased the chance of fires by ensuring most houses were over using generators and there was no access to water to put out fires.
Residential	North Bay	A19135531	Power outage triggered a mold/mildew problem at my house that not only ruined most of my clothing and bedding, but got me very ill with bronchitis and pneumonia. I have thousands of dollars in bills for mold remediation, hauling, and replacing ruined contents of my home, including bedding, clothing and much more. There was a gas leak that needed repair at my home on 11/8, and now the looming threats of power outages is creating terrible stress in addition to ongoing threat to my health, home, wellbeing and safety.
Residential	Stockton	A19134138	Power shutoff in Amador County. This resident uses an oxygen compensator for COPD. These incidents cause an emergency situation when the electricity is out.
Residential	North Bay	A19134212	We where driving home on solano ave about to turn right into Florida the traffic light was not working due to the power outage and streets where pitch dark we made a stop at the non working light and as we where waiting for another car to pass that had gotten their before us we got hit from the back by a truck that was driving fast and didnt see us I had to be transported via ambulance to the er and now due to my injury I wont be able to work for a week or even more
Residential	North Coast	A19135752	PG&E Turned off our power for 5 days. i tripped in the dark when I came home the first day to no power because we were out of town and did not know power was off. I hurt my back pretty bad, i have had back injury in past and missed two days of work due to pain. also loss over 500 in food.
Residential	Systemwide/Multiple	A19133819	Power outage due to winds. Spoiled foods in over 100 degree weather, no a/c , loss of work. Spending unexpected money to eat out that I didnt have to spend
Residential	Systemwide/Multiple	A19134730	Outages on 6/126/13 , 9/24 through 9/25, 10/9 through 10/11. This claim is for reimbursement for Propane gas for my whole house generator that ran during the PGE outages. We also lost Solar production on those days, but am not claiming.
Commercial	Central Coast	A19133121	PGE shut the power off to my repair shop without my consent and without proper notice. I lost a thousand dollars in sales.
Commercial	Central Coast	A19133395	food spoilage and loss of business income due to the planned power shutoff that lasted from late 10/9/2019 to the evening of 10/10/2019. claim submitted on behalf of the business by XXXXX
Commercial	Central Coast	A19133494	Power went out lost computers , phones and internet which is vital part of the business. People couldnt call in and make appointments. Or were not able to get repairs
Commercial	Central Coast	A19133758	out of power
Commercial	De Anza	A19133452	We are a fine dining restaurant and Cafe. We lost power due to the public safety shutoff of Wednesday, 10/9/10. Power was not turned on until after 7pm on 10/10/19. We are a fine dining restaurant and lost an entire day of sales on 10/10/19. I will include POS reports from all the Thursday's sales in October 2018 and averaged those amounts to come up with our claim. We were lucky enough to find offsite storage for our perishables and did not suffer any inventory loss. Our only other claim is for wages for employees that had to move the perishables to an offsite location.

					<p>We have been scheduled to perform service work at two sites in the PG & E area for the Brentwood Unified School District. This work required a shutdown of the power to allow for work within the switchgear. The crews mobilized on Monday, October 7th to prep for the scheduled outage on October 8th at 8 AM. This morning October 8th, no PG & E crews showed up to the sites. Our scheduler contacted PG & E and was notified that no one would be coming. They were pulled off for an event in the area. Our crews who traveled from Victorville CA are now being told it will be weeks before we can schedule again. This means the work and preparation leading up to today are wasted. This is a prevailing wage job. 4 Installers X 2 Days X 8 Hours X 124.00/Hour 7,936.001 Supervisor X 2 Days X 8 Hours X 135.00/Hour 2,160.002 Scheduler X 6 Hours X 76.50/Hour 918.006 Hours X 2 Trips X 4 Installers X 76.50/Hour 3,672.0032/Day per diem X 3 Days X 4 Installers 384.00120/Day hotel X 2 Nights X 2 Rooms 480.00</p> <p>The power was out at my place of employment and I lost a day's wages, 176 dollars in wages.</p>	A19133310	Diablo	Commercial	
					10/21/2019 12:24:50 PM (dggf)				
					Poster Compliance center	A19133529	Diablo	Commercial	
					We have disabled rescue animals that require consistent access to heat lamps, heating pads, air conditioners, refrigerated medicines for their survival. We had to drive to San Francisco and purchase a generator to power these lifesaving needs. XXXXX	A19133815	Diablo	Commercial	
					power outage for more than 48 hours	A19133029	East Bay	Commercial	
					Power was shut off starting sometime in the night of Wednesday turning into Thursday. We had no power until Thursday night. We were not able to bake our usual pastries and therefore lost approximately 600 dollars in revenue	A19133922	East Bay	Commercial	
					The Public Safety Power Shutoff resulted in St. Helena Unified School District closure Wednesday, October 9 through Friday, October 11. I am a self employed counselor/outside contractor working in the School District. Wages lost for two days October 10 and 11.	A19133145	North Bay	Commercial	
					I suffered a cancellation of an Airbnb stay at my home because we had no power and no water. They needed to make a decision before their flight the day prior, since there was NO estimated time of service being restored they cancelled. Our property was uninhabitable without power and water, and guests were flying in from the East Coast.	A19133165	North Bay	Commercial	
					Lost revenue. Airbnb guests were without power, so no hot water, no pump for sewage, no light or heat. This lasted for 3 nights so I had to refund guests who were booked for 2 nights 212.20 and 1 night of the next guests stay 130.00 for a total of 342.20. I had to pay to have the backed up sewage cleaned up 40.	A19133173	North Bay	Commercial	
					I have a chronic medical condition, called pulmonary fibrosis, that requires uninterrupted oxygen flow throughout the night. Shortly after the Public Safety Power Shutoff began just after midnight 10/09/19, my oxygen stopped working due to lack of power putting me at risk for severe breathing issues. As a result of the outage, and limited prior notification of the outage, I did not have a sufficient backup oxygen supply. I then had no other option than to order an emergency supply of oxygen at a significant out of pocket cost to get me through the then unknown duration of the outage. I am submitting the bill for the emergency oxygen supply for reimbursement.	A19133252	North Bay	Commercial	
					PG&E turned off power tour Business for three days for no reason.	A19133505	North Bay	Commercial	
					Due to PSPS, we lost three shifts of restaurant business and all our perishable food goods.	A19133523	North Bay	Commercial	

	Commercial	North Bay	A19133558	PG&E Power Outage caused this business to be closed for 2 days resulting in loss of income in the amount of approximately two to three thousand dollars. Days of loss were Wednesday, October 9 through Thursday October 10.
	Commercial	North Bay	A19133717	Because of the power outage, we were forced to close my orthodontic dental practice for two days. Approximately 60 patients had to be cancelled. There was no physical loss of property. My loss was of business production during those two days.
	Commercial	North Bay	A19133757	Power shut down in St Helena lasted from 1a on Tuesday morning until 1740p Thursday evening displacing guests, pissing off customers, resulted in our needing to shut down our restaurant, etc. While we continued to operate, we struggled mightily and suffered large financial set backs.
	Commercial	North Bay	A19133914	Power outage for 24 hours and lost of income and food spoilage and paid labor food.
				When I arrived to work Oct 9th the power was off, so I had to cancel all appointments for Oct 9th and 10th. My business is a salon, so no customers means no sales or tips for anyone. The salon average daily revenue is 1,100 not including tips which average 20%. This would have been a busy time, as it is most all years with fleet week.
	Commercial	North Bay	A19133924	Power went off for a few days leaving our business in the dark
	Commercial	North Bay	A19134404	Our Physical Therapy clinic had no power for 2 days 10/9/19 & 10/10/19. Our clinic relies on electric power for our medical equipment and for our computers for documentation and scheduling. As a result of the power shut down we lost at least 3,450 dollars in revenue and close to 2000 dollars in wages for 4 employees. In addition when the power came back on 10/11/19 our main computer was no longer functional and had to be replaced.
	Commercial	North Bay	A19134449	We lost power a total of 9 days therefore we incurred loss of revenue
	Commercial	North Bay	A19134651	Power was off for the entire business day and we were not able to open. Based on the last two Wednesday sales of 562 and 693, we are estimating a loss of 627 for the day. Adjusting for our 55% margin, we lost 345 gross profit for the day.
	Commercial	North Bay	A19135000	Our Power went out and we were not told in advance. Hourly Employees showed up for work and were paid for 4hours for showing up. They were sent home. Also, we lost revenue that we could not recover because of patience needing the product immediately. Also, we had schedule people on their off days to come in and inspect all equipment.
	Commercial	North Bay	A19135432	Power was turned off on the 9th and 10 th of Oct so I could not open my store and lost two days of business.
	Commercial	North Bay	A19135539	I run a full service salon and I am completely booked tomorrow I am losingout on 2,700 tomorrow and I am totally upset with Pg&E I received theoutage message today at 705pm that gave me no time to contact clients toreschedule I simply just have to cancel all these appointments. No warningwas given no time at all was given to me to make any arrangements
	Commercial	North Coast	A19133010	Due to the power outage, I lost one full day of work at my primary place of employment. I am paid 27/hr at 8 hrs, equaling 216 lost. Additionally, the uncertainty of length of outage also caused the cancellation of two consulting jobs. The first job was for 75/hr at 3 hrs and the second was for 50/hr for 5 hrs, equaling 475 in lost income.
	Commercial	North Coast	A19133024	Evacuated our home which is also our business location. We were evacuated for 5 days and could not conduct our daily business. Our estimated loss is based upon income of 98,000 divided by 260 work days equalling 380 a day for 5 days. See attached image for a screen shot of our income statement.
	Commercial	North Coast	A19133129	

				Power at hotel went out at approximately 3am the morning of Wed Oct 9. On the morning of Friday Oct 11 at approximately 10a the power came back on. We had to cancel guest reservations, group events and we had to close the restaurant and room service. We had to buy lighting for guest and employee safety, rent a generator and wash our laundry off site. Those items totaled 24,355 in addition to the items listed below.
Commercial	North Coast	A19133200		Power outage caused loss of revenue.
Commercial	North Coast	A19133204		Due to the 68 hour POWER shut off, we experienced loss of 2 freezers full of food, plus 2 fridges and a min. of 24 hours of lost work. our two separate businesses offices were effected
Commercial	North Coast	A19133228		XXXXX t had a class scheduled for Wednesday, October 9 see enclosed class enrollment record. This class was scheduled months ago and had over two dozen students. At 745 we were told that power would be out for the day. We were notifying students until 9PM the night before that there was no longer a class and trying to roll them into a future class. No time to reschedule since we had no anticipation of power outage. This is costing our family income that we could have adjusted for by rescheduling for a different classroom date, etc. if we had any advance notification. Now, this income is gone and even our next class is impacted. XXXXX has been in operation for 13 years. Student cost for training and testing is 120.00 each. After 30.00 for testing materials, class rental, operating and overhead costs, Carol would net at least 60.00 per student so we are requesting a claim for 1,200.00.
Commercial	North Coast	A19133243		Power was shut down for over 48 hours we were not able to operate and had to close for two entire business days.
Commercial	North Coast	A19133264		Due to power outage of this location for over 2 1/2 days, I had to closed the shop.
Commercial	North Coast	A19133372		Due to power outage of this location, I could not open the shop for 2 days.
Commercial	North Coast	A19133373		Pge shut off for 3 days
Commercial	North Coast	A19133605		POWER OUTAGE LASTING APPROX 63 HOURS AFFECTING HOME AND BUSINESS ACTIVITIES FOR MY BUSINESS
Commercial	North Coast	A19133675		When the power shutdown , all the fridge freezer start to go up in temperature. 1 day after the shutdown we start loosing product like croissants,dough,macaroon,bread
Commercial	North Coast	A19133715		PSPS
Commercial	North Coast	A19133789		PGE shut off the power to all of Humboldt county by mistake. They forgot a transmission line that feeds Humboldt power that they were working on. We received very short notice that power was going to be off and we were told at the last moment that it would be out 3 to 5 days. It only was out for slightly more than 24 hours. Because of the miscommunication and inaccurate time estimate of power outage, we lost major revenue in our hotel. This resulted in 17 cancellations due to the power outage and the time we were required to tell the guests it could possibly be out. This cost our hotel over 2,750.00 in revenue.
Commercial	North Coast	A19133831		PGE Forced Power Shut Down resulted in Loss of Revenue.
Commercial	North Coast	A19133889		Forced PGE Power Outage resulted in Loss of Revenue
Commercial	North Coast	A19133890		Forced PGE Power Shut Down caused Loss of Revenue
Commercial	North Coast	A19133891		Forced PGE Power Outage resulted in Loss of Revenue
Commercial	North Coast	A19133893		We were unable to work Wednesday October 9th due to the scheduled outages. We were given generic estimated times of restoration for the incident. Our work decided not to pay hourly employees for that day.
Commercial	North Coast	A19133926		I work at a chiropractic clinic in Santa Rosa, CA. We received notice on 10/8/2019 that our office power would be turned off due to weather conditions. Due to our power being off for two entire days, hourly staff, including myself, was unable to work and lost income for 14 hours. Salary employees were not affected by this loss. I am seeking 322.00 in lost wages due to this outage.
Commercial	North Coast	A19134257		

Commercial	North Coast	A19134432	Power was turned off at night preventing the shop from opening at 9am. I had to reschedule 10 clients.
Commercial	North Coast	A19134451	Due to PGE power shut off we were forced to be closed for an entire day without more than 5 hours notice.
Commercial	North Coast	A19134474	The power went out and we were left in the dark. The PG&E web site was down, I could not work at my jobs, as they need a working computer, so I was stuck in more than one way thanks to the power outage. Also my land line did not function and we were left in a cold dark house, with all of our comforts gone....
Commercial	North Coast	A19134944	PG&E turned off power for Public Safety Power Shutoff. The website could not be loaded and we could not confirm if/when we would loose power. We had to trash everything per Sonoma County Health Department guidelines.
Commercial	North Coast	A19136303	Electrical service was shut down for over 24 hours to Mobilehome Park. Property has two major sewer lift stations running 4 pumps. Plumber had to be called out to make trips pumping out basins to avoid overflow and potential contamination of Elk River.
Commercial	North Valley	A19133100	Power Outtage for two business days, we were able to operate, we have tanning beds and 6 hair and nail stations all 4 employees were unable to attend to clients resulting in wage loss, 3 people had 2 clients that were 200 dollar appointments, another had 4 appointments at 200 a piece. was unable to be made including the 200 in tanning revenue lost due to us having to be closed and tanners demanding money back.
Commercial	North Valley	A19134192	power went out at work for two 8 hour days.address of employment isXXXXXX
Commercial	North Valley	A19136090	I was contracted to work a longterm substitute teaching position from September 26 to November 11, 2019. Due to PGE power outages, 4 times my teaching days were cancelled resulting in the loss of 241 per day.
Commercial	North Valley	A19136313	This is in regards to the CPUC rulemaking 1812005 and the PSPS events on 10/8 10/11 and the events on 10/2610/30. PG&E acted in an unreasonable way and did not comply with the statue commission decision on how to execute these events which resulted in significant safety risks and financial losses to XXXXX XXXXX is also a transmission customer who was not supposed to be effected by any of the shutdowns. XXXXX received no notifications for any of the events for any of its sites even after submitting all the contact information for notifications in May. We confirmed this information was correct with PGE and still receive no notification for the second event. We also received no notification for when the events were over and the lines were regenerated.
Commercial	Peninsula	A19133765	The planned power shutoff hindered the XXXXX ability to operate school for a business day. This outage made for a loss in a day's work/education for students, as well as lost funding for specific State Grants based on attendance.
Commercial	Peninsula	A19134182	Our business hours start at 11AM to 9PM, due to public safety power shutoff business got interrupted.we're not able to operate our business.and some of our food product gets spoiled
Commercial	Peninsula	A19135305	As a result of power loss to my business on October 10th, 2019 clients cancelled their appointments. Also, on October 11th and 12th 2019 client cancelled their appointments as they anticipated power would still be out and therefore it was a loss of business revenue to my salon
Commercial	Sacramento	A19133792	PSPS
Commercial	Sacramento	A19135079	Public Safety Power Shutoff
Commercial	Sacramento	A19135239	PG&E turned off our power. In order to get to work and run my business I had to install a new garage door with a power saver feature and purchase a generator. We have also had to use the generator to power our refrigerator and freezer so we would not lose thousands of dollars of food.

Commercial	Sierra	A19133159	Power was intentionally cut to most of the county. We were unable to be open for business on Wednesday and Thursday as well as a portion of Friday.
Commercial	Sierra	A19133209	Power was turned off at my business and I couldn't work for 3 days. We lost product, in addition to not being able to produce our daily 800 pounds of bread for our customers. Approximately Sixteen hundred dollars a day
Commercial	Sierra	A19133238	Our power was turned off for 65 hours. During this time I had to close my business for 2 of those days. I take care of children and found it to be unsafe for them to be here without power. I lost 400 dollars each day I was closed. I also had to throw away all of the food in 2 refrigerators as I felt it was unsafe to feed to the children, this resulted in a loss of 250 dollars. While I understand your need to keep our community safe I feel that the steps taken on your part were unnecessary as we did not have high winds. Also the amount of time that it took you to turn our power back on was just too long. The amount of customers affected by this outage was way too much for you to handle. In the future I hope that you will revise your policy and that you will learn from the mistakes made with this first PSPS. My family has learned where we failed and plan to rectify our emergency plan.
Commercial	Sierra	A19133448	PG&E cut our power for two full business days resulting in a minimum revenue loss of 37,000 USD. This is not counting the extra labor it took to stay Operational with no phones or access to internet, etc... We take our business over the phone and that was taken away from us when PG&E cut our power. This loss threatens our business and we are in danger of going into severe debt because of the power outage. We have not experienced such a tragic loss since the start of our business in 1935. We are family owned & operated and our employees rely on us to provide them with work. This is a catastrophic loss for our company and our claim of 37,000 USD is only addressing loss of revenue for our company....it does not address the situation you have put us in with not being able to provide adequate work for our employees...this is a terrible situation and we are praying that you honor our claim. Thank you for your consideration. We look forward to hearing from you.
Commercial	Sierra	A19133623	PGE shut power off winds were less than 6mph in Placerville. Missouri Flat Road business customers one mile to the west were not shut down.
Commercial	Sierra	A19133673	My business was without power for several days so i was unable to work and lost wages do to this outage.
Commercial	Sierra	A19133684	I am a seamstress and had 3 homecoming dresses I was working on and due to the power shut off, I was forced to return them all to the customers partially taken apart for alterations. They then had to take to a different seamstress in an area unaffected by power outages to finish my work, which I was then not compensated for. I lost 300.00 in wages I would have been paid for my work that I had started and was unable to complete.
Commercial	Sierra	A19133693	Due to the blackout that suffered Placerville on 10/09/2019 until 10/11/2019 we as a small restaurant owner lost all the food we used for our business like meat, vegetables and other already cooked food like tamales, chiles rellenos and cheese.
Commercial	Sierra	A19133802	Due to power shutoff for three days store could not open for business and serve customers. No service for register, phones or cashless payment system. Wed thru Friday are typically busy business days prior to weekend sales
Commercial	Sierra	A19133934	loss of revenue, loss of payroll, loss of perishable merchandise
Commercial	Sierra	A19133935	My office was closed down for 2 whole business days.
Commercial	Sierra	A19133970	During the month of October there have been three separate incidents where PGandE has shut off power at our shop. Due to this power outage we were unable to conduct business at our retail shop or our wholesale accounts. This has resulted in tremendous loss and we have no idea how we will be able to pay our rent of bills because of these occasions. We are a small family just trying to make it and every single day counts. We have lost several days of business because of these outages.

					The Power was turned off on the following days October 9 thru 11 for 36 hours. October 23 thru 24 for 27 hours. October 26 thru 28 for 48 hours. I am an independent contractor that bills hourly. I lost billable hours to the total of 48 hours at an hourly rate of 75 plus the cost of a generator to have any attempt at connectivity to the internet for work cloud access and to prevent our food from spoiling and allow us to have charging ability for our phones and laptops that we use for work. We do not have a land line and needed to keep our devices charged up and available for emergencies. The generator cost 1130 and hourly wages totaled 3600 for a total loss to my business of 4730. The math below doesn't match for some reason and I don't know why. I am putting the generator in the lost revenue section because it is straight out income/revenue that purchased it. My hourly rate of 75 for 48 hours totals the wages paid to hourly employees.
Commercial	Sierra	A19134052			The power outage in Northern Ca is causing financial hardship. When power is out at my husband's work he does not get paid. My PG&E bill is coming up and so is my rent for November How am I suppose to pay it, when no income is coming in. He has lost 5 days of no income. Can you discount our electric bill for November and some reimbursement would be nice also. We are going into financial hardship as a lot of other people do to this outage.
Commercial	Sierra	A19134210			A power outage caused the dental office to be closed. Resulting in a loss of revenue. Employees did not receive any wages since the office was closed.
Commercial	Sierra	A19135192			Power went out couldnt work in my business
Commercial	Sierra	A19135364			I was contracted to cook for a 3day retreat that was cancelled due to the PSPS events in our area.
Commercial	Sierra	A19135388			The outage came at the same time as a clients deadline. The deadline had to be met to insure future orders. Fearing no power and being unable to meet the deadline a generator was bought. Extension cords,connectors and gas was needed to power the generator.
Commercial	Stockton	A19133568			We were unable to open our store due to the power outage on 10/9 and 10/10. No lights to see, no heat, and no way to process payments or sales. Claim amount it based on our daily average revenue at 689.93 for 2 days. Supporting documents are company bank statements to average the daily revenue.
Commercial	Stockton	A19133713			Power was turned off by PGE for a wind storm that never happened. My daycare was closed and i was unable to go to work. My refrigerator and two freezers of food needed to be replaced.
Commercial	Stockton	A19133806			Power was shut off for two days on 10/9 to 10/11 and shut off on 10/28
Commercial	Stockton	A19134099			PG&E needed to shut off our power for safety reasons due to a wind event. The notifications were not enough time to get adequately prepared and too vague to do any better planning. We didn't know for sure when power would be down not when it would be back up. We are unable to open our business when the power is out and unfortunately much of our product needs to be freshly prepared the day before we are open.
Commercial	Stockton	A19134931			PSPS event 10/10/2019
Commercial	Yosemite	A20136987			Power went out on 10/10. On the afternoon of 10/11, I left work to rent a generator because my mom is on a ventilator. When I fired up the generator at home, the power returned. Please reimburse me for the rental of the generator and lost wages.
Residential	Central Coast	A19133128			2 million customers had to prepare, including myself. I had to purchase supplies to prepare for the power outage. I should be reimbursed for those supplies. 47 dollars and 38 cents.
Residential	Central Coast	A19133479			I work from home and I was unable due to power outage.
Residential	Diablo	A19133265			Lost 529 of wages when power went out.
Residential	Diablo	A19133266			My power went out twice and I used 12gals of fuel for my generator during the power outage to allow me to stay in my residents
Residential	Diablo	A19135347			No power and we had to buy a bunch of new food that spoiled.
Residential	Diablo	A19135656			lost one day pay due to power outage from PGE wildfire experiment. company will not pay for lost
Residential	Diablo	A19136493			

				time	
	Residential	East Bay	A19133552	Our 7 year olds school was closed and he could not attend school, which resulted in a full day of lost wages for me.	
	Residential	East Bay	A19133553	Our 7 year olds school was closed due to the power outage and he could not attend, resulting in a full day of lost wages for me.	
	Residential	East Bay	A19134563	Do to psp's I lost food. Had to get hotel because I'm in a wheelchair and use CPAP machine having medical baseline didn't help me. Lost food in fridge and freezer	
	Residential	East Bay	A20136698	Due to multiple outages drained Bay Alarm battery. Was charged extra to replace battery due to PGE outages....95.00	
	Residential	Mission	A19133361	Family member requires a CPAP machine. The planned outage on 10/9/19 was supposedly due to high winds and low humidity levels. This planned outage was delayed multiple times throughout the day. By 10 PM we were unable to get updates from the PGE websites, had no winds in our area so did not expect the outage that began shortly after 11 PM. Family member had to go to hotel, rest of family stayed home to watch over the house and care for the pets.	
	Residential	Mission	A19134750	Due to extended power outage on Oct 9 and 10, 2019 our lawn watering system was reset to false setting of 6 hours watering time at 12 AM instead of 5 min at 9PM. On Oct 12 we left for 2 weeks vacation and did not notice system reset. After arrival we received alert from EBMUD and a bill for 400 compare to less than 100 usual water use. We found no leaks and the only reason for excessive water use during our absence is watering system reset due to power outage	
	Residential	North Bay	A19133131	Power cut for over 2 days due to wind. Total loss of all food in the house. Had to get a hotel to stay in, and eat out.	
	Residential	North Bay	A19133194	The power went out my food went bad and I couldn't work.	
	Residential	North Bay	A19133278	Power shut off to the XXXXX property due to fire prevention measures. XXXXX is claiming spoiled food items and mileage for eating out. Please see the attached Allstate document supporting monies paid out.	
	Residential	North Bay	A19133487	The power was shut off for more than 48 hrs. Due to the power outage my hot tub temperature decreased to cold water. It takes roughly 85 dollars to reheat I am asking a reimbursement as I should not have responsible for paying due to the outage. Thank you for the consideration.	
	Residential	North Bay	A19133784	Power out for 3 days. Lost all of my food. Had to leave the house and stay in a hotel with my family	
	Residential	North Bay	A19133797	Due to power being off, I was unable to attend work since my office did not have power and the internet tower were not providing service to them.	
	Residential	North Bay	A19133902	Power was shut off for 48 hours, entire fridge of food had to be thrown away as well as two days lost work unpaid due to no power.	
	Residential	North Bay	A19133941	Lost two day of wages and tips because my place of employment, the XXXXX, was closed due to lack of power.	
	Residential	North Bay	A19134438	Claiming 100 dollar credit for power outage 10/9 through 10/10	
	Residential	North Bay	A19134489	PSPS without warning. Please issue credit on next billing cycle	
	Residential	North Bay	A19135308	PG&E shut off our power as part of a scheduled power outage in our area.	
	Residential	North Bay	A19135587	Forced to stay home from work and use vacation leave in order to help with three small children get through power outage as my wife was still breastfeeding and needed to pump in the car while running, along with many other issues when the power was shutoff.	
	Residential	North Bay	A19136153	Power shut off for 4 days. Our small business that is our entire livelihood could not function as we rely on power and our technology to function and print time sensitive documents. No wifi and could not work. Big , Big hardship and it happened again later in October with same income loss. Then the threat of the 3rd scheduled power outage cost us days of time to prepare .	

Residential	North Coast	A19133041	Shut off of power lead to loss of needed wages for family to support them. These wages are needed asap to pay for food that was lost during outage.
Residential	North Coast	A19133048	Power outage as decided by PG&E. As a result of power outage, I lost income because two planned events for which I was contracted to be paid were canceled. I am an independent contractor/consultant and am not paid for work when events are canceled.
Residential	North Coast	A19133130	Power was out for 2 days for absolutely no reason. The wind was not blowing and I don't live near the hills or trees. I am well within the city limits. There were houses across the street with power. We finally went to a hotel to at least be able to get ready for work and take a hot shower and a good night sleep.
Residential	North Coast	A19133229	Planned PSPS, since the power was off for 3.5 days I lost wages due to no power at my office location.
Residential	North Coast	A19133248	Power Outage caused by PG&E , caused me to lose a few items in my fridge and freezer and also had to purchase dry ice to keep the rest of food from going bad. As well as having to purchase lanterns in order to see.
Residential	North Coast	A19133495	Lost about 300 worth of groceries, had to miss 3 days of work and kids school and extra curricular activities that we have to pay for.
Residential	North Coast	A19133545	PSPS that lasted for more than 48 hrs in lake county.
Residential	North Coast	A19133655	Two days without electricity.I had to but a generator 549.99 and 25.00 gas for the generator. Also 100 dollars food went to waste. I have proof.
Residential	North Coast	A19133785	Planned power outage. We lost everything in our refrigerator and freezer. I have a home business and lost 2 full days of work.
Residential	North Coast	A19133833	cu, was off of work due to psps. off for 3 days of work.
Residential	North Coast	A19133873	Loss wages
Residential	North Coast	A19134490	Due to the blackout, I lost wages for this whole day.
Residential	North Coast	A19134639	power outage caused by pgande
Residential	North Coast	A19135044	Due to the power outages leading up to and during the Kincade fire my job was out of power for a majority of the month of October. As a result my paychecks have diminished severely, which has made it difficult to maintain my monthly expenses, as well as providing for my 3 year old son.
Residential	North Coast	A19135946	Purchased a generator at 1000.00 and spent 500.00 in gasoline to run the generator during multiple power outages
Residential	North Valley	A19133066	Our business, XXXXX, was unable to operate due to your power shutoff. We lost a lot of revenue in the 3 days that our business was affected. We had scheduled jobs that we were unable to perform because our customers did not have power due to your outages. Being a very small family owned and operated business, this put our family in a financial hardship.
Residential	North Valley	A19133162	for the period of 10/09 to 10/11 of 2019power outage we used a total of 12.8 gallons of gas at 3.89 per gal, total 50.00. we are on med base, so we can not do without pG&e.
Residential	North Valley	A19133234	Power went off at 0130 hr on October 9 and did not return until approx 1700 hr October 11.That is 63.5 hrs by my calculation. Kept refrigeration and freezers going with my generator. Attached find receipt for fuel costs for replacement of fuel used during outage.
Residential	North Valley	A19133887	Power outage
Residential	North Valley	A19133971	Scheduled Power Outage. Due to your scheduled power outage, we don't have water on top of electricity. As you're aware, we need water in our home, so we had no choice, but to stay in a hotel in Redding, CA
Residential	North Valley	A19134037	We have lived here for 28 years and have never needed a generator. I am putting in a claim for the price of the generator.

				I lost my job and my car is broken, I have to stock up on groceries. I do NOT receive any benefits of any kind, my sister loaned me money. I received the notice for the first outage right after buying 147 dollars in groceries. I've provided the replacement grocery receipt, the items with asterisk gone thrown out in the second outage. The second receipt is food bought special for the third outage. I also had to pay for Ubers and Lyft's to Walmart. Safeway charges delivery and service fees.
Residential	North Valley	A19134136		CUSTOMER EXPERIENCED PSPS. GROCERIES WERE SPOILED DUE TO THE OUTAGES.
Residential	North Valley	A19134624		CUST REQ ASSISTANCE WITH BUSINESS BECAUSE OF THE POWER GOING OUT HIS VENDING MACHINES WERE NOT WORKING AND HE LOST MONEY DUE TO THESE SALES
Residential	North Valley	A19134898		The power went off for 24 hours. Can't remember exact time but remember having generator on thru the day and having friends over for dinner by candle light. Power went on next day. We had to use up gasoline for our generator but were fortunate not to have lost food this particular time.
Residential	North Valley	A19135385		The Power was down for 48hrs causing several pounds of food to spoil and two days of lost wages.
Residential	Sacramento	A19133664		Pg&e power outage shutdown....Food had to be thrown out, had to spend money on more food items and went out and had to call out from work due to there power off
Residential	Sacramento	A19133702		Power went off around midnight and I use a CPAP machine for breathing, but I could not use the CPAP. I was also recovering from surgery for bilateral knee replacement on Sept 27, 2019 so my mobility was limited. My sister who was helping me had to pack us up the next morning and travel to her home in Oakland where the power was currently on. I was able to sleep in her living room with my machine since stairs were difficult. We were able to borrow a toilet chair. Fortunately the power on her street stayed on. When power returned to my house we returned to Vacaville
Residential	Sacramento	A19133736		XXXXXX is 100% disabled from the Vietnam War. We can provide all documents from the VA if necessary. He had emergency Oral Surgery on October 9 2019. He was in need of care at his home for the next 5 days. He was not able to be cared for medically in his home because the power was shut off. He was transported to a hotel for 2 nights until the power was turned back on and was returned home.Please reimburse his Hotel bill for the night of October 9 and 10 2019. If you medical records or other information please let us know and we will provide the surgery and medical information you may want.
Residential	San Jose	A19134167		I bought dry ice in preparation for the power outage you notified me about, in order to keep my refrigerator and freezer cold and to prevent the loss of food. I paid 30.87 dollars for the dry ice, and I ask that you reimburse me for that amount. Thank you, XXXXX.
Residential	San Jose	A19134845		On October 28, 2019, before the scheduled power outage from PG and E all of my electrical outlets worked on all rooms. After the power outage, all of the electricity except for my master restroom and my kitchen lights did not come back. The power outage short circuited the wires that one of your associated named, Scott, inspected and confirmed to file a claim. Scott inspected the wires on February 4th, 2020 at 0406PM and provided a receipt of inspection. The confirmation/field order he provided is 8557732470. With that, I would like the wires to be fixed/replaced since they were working before the power outage and now they are short circuited after the power outage.
Residential	San Jose	A20137141		I have not been able to go to work in 3 days losing 465.76 in gross pay for myself and my husband has lost 260.82 dollars in lost wages as the power was out to both of our jobs. we have lost a refrigerator and freezer worth of food, best estimate would be 280 dollars worth.
Residential	Sierra	A19133114		PSPS caused my work being close and I lost 3 days worth of wages.
Residential	Sierra	A19133157		PspS
Residential	Sierra	A19133161		PSPS caused my work location to be shut off. Lost wages for 2 days.
Residential	Sierra	A19133166		

Residential	Sierra	A19133185	With you PSPS power outage in Northern California, I was unable to work the entire time. I am an independent contractor that depends on the restaurant businesses around me to operate. I make on average 120 dollars every day that I work, the loss of this income has made it to where I cannot even purchase gas in my car to keep working.
Residential	Sierra	A19133250	Power shut off 4am 10/9/19. Between that time and return of power approx. 1p 10/11/19, multiple food products requiring refrigeration were lost. Also, I had to stay in a hotel on 10/10/19 so that I would have power to continue my job responsibilities.
Residential	Sierra	A19133279	Power was shut off for 2 days. I lost time from work as well as freezer items.
Residential	Sierra	A19133293	Power was shut off with an estimated 4 day duration. Dry Ice was purchased in order to keep frozen 41 prepared meals, and a rack of ribs frozen.
Residential	Sierra	A19133296	POWER WENT OUT AND COULD NOT WORK FOR 2 DAYS AT 19:00 A HOUR.
Residential	Sierra	A19133337	psps customer filing claim for lost hours from work
Residential	Sierra	A19133387	You turned off all my Electric. I could Not go to work for three days. Lost 240.00 dollars is pay. Did Not have Hot water. Lost food worth 50.00. did Not have Heat. This was a very Stressful and dangerous three days...Need to purchase candles and batteries, ice, ect. I will expect my reimbursement to be mailed to me in the amount of 290.00
Residential	Sierra	A19133403	My power was shut off for around 40 hours, causing my food to rot, even though I restocked my fridge and freezer with ice. It also caused me to miss work on Thursday 10/10/19.
Residential	Sierra	A19133439	power outage caused by pg&e
Residential	Sierra	A19133485	I work 80 hours a week from home. Because of the power outage I lost 20 hours from my weekly pay. I work remote from my home.
Residential	Sierra	A19133507	Power outage from October 9 to October 13 lost all food in freezer and refridge, suffered a great deal of stress, no connection with outside world or even to call 911 because phone was not working due to outage. Developed physical and emotional issues due to not having power
Residential	Sierra	A19133580	As a result of your shutting of power the week of October 7, my irrigation was reset among other things and out power spiked. The irrigation is set to activate the water pump well water in the middle of the night when power rates are lowest. The power outage caused the system to sporadically go on at off hours and spike. It also reset the irrigation to go on midday at higher rates. The irrigation requires a fair amount of power from the well pump to run. The tome of use alone will cost 10 dollars/month more, plus an additional 7 dollars in 'usage' due to devices in the home malfunctioning due to your planned outage. I also had to pay an electrician to go to the home to check on it ensuring nothing else was malfunctioning which cost me 65 dollars. This is not my primary residence I do not live there full time. At minimum your actions cutting the power cost me 85 dollars. I expect to be reimbursed for this expense that your actions resulting in for me
Residential	Sierra	A19133626	power outage required my needing hotel space to power my oxygen and nebulize machine ,gas for car, groceries,
Residential	Sierra	A19133636	I lost a whole Freezer and refrigerator full of meat and frozen food. I had no water or capability to prepare food for my family of 5. We had to rent a hotel room for 2 nights. We had to find facilities for food so we could eat and there was a very small amount of business with power.

			PG&E shut off the power on Wednesday October 9, 2019 at 330 am, & the power was restored on October 11, 2019 at 330 pm. As a result I lost wages for 2 days, to continuously run our generator to preserve our food in our refrigerator and freezer. Being paid only once a month & could not afford to lose all the food we already purchased for the month. Since we had to continuously run the generator, we had to travel to 2 different gas stations to fill up my gas cans, to refill the generator. Because PG&E shut off surrounding area around my home, I had to travel 30 miles for the closest gas station that had Electricity, in Rocklin, CA. With PG&E shutting off my power for 3 days, we had to make food without power, lost money due to not being able to go to work and had to spend additional money on gas. This power outage caused financial hardship, as well as emotional distress and 660.62 should be refunded back to me.	A19133676	Sierra	
0	Residential		PSPS that occurred. Seeking reimbursement for propane used for generator.	A19133947	Sierra	
0	Residential		PG&E turned off the power to my home and workplace. I was unable to work and missed approximately 1 1/2 days of work and the associated pay.	A19133962	Sierra	
0	Residential		Gym closed due to power outage. Unable to train my clients.	A19133982	Sierra	
0	Residential		Lost wages for power outages. Outages were Oct 9 through 11, 23 through 24, and 26 through 28. I get paid 40 per hour and I missed four days of work and I usually work 8 hours a day, which totals 1,280 dollars.	A19134342	Sierra	
0	Residential		Due to multiple PG&E power outages , I was not able to keep my house/family warm/safe at night. This forced me to relocate my family to a nearby hotel on multiple nights. I have hotel receipts for the following nights, Oct 9 10, Oct 26, Oct 27 and Oct 29. Transportation costs are included, 162 total miles at 25 miles per gallon and 4.00 dollars a gallon.	A19134504	Sierra	
0	Residential		I am a web developer and I work from home. PG&E blacked my power out for almost 7 days this month, and 4 of those days were business work days for me causing me to lose out on about 800 dollars in income. Most of the blackout days we did not even have high winds in my area. I also lost about 300 in food as most food could not be sustained through 48 hours or longer of blackouts.	A19134704	Sierra	
0	Residential		I work in a Doctor's office and the power was out for several days, our computers wouldn't work and neither would on phones so I missed work.	A19134835	Sierra	
0	Residential		There was a power outage in my city for more than 48 hours, starting on October 9, 2019. As a result, I had to stay at a hotel, located approximately 35 miles away. My office for my business is located in my home. Therefore, I had to stay at a hotel to continue operations of my business.	A19135005	Sierra	
0	Residential		MANDATORY SHUT OFF	A19135082	Sierra	
0	Residential		Our power was turned off during PGE Public Safety Power shut off October 9, 10, 11, 24, 25, 26, 27 and 28. Our home is serviced by our well. We purchased a gas generator last May in case of a power outage. If PGE turns the power off during hot dry weather and there is a fire on our property we cannot fight the fire because we have no water as our well is powered by PGE electricity. I filed a complaint with the Public Utilities Commission regarding the shut offs. We are asking for compensation for the purchase of our generator and the gasoline we have purchased to run the generator during the outage.	A19135201	Sierra	

				Had to cancel an Airbnb guest who was booked at my house OCTOBER 11, 2019Airbnb SupportAirbnb SupportXXXXX,Thank you for reaching out to us. My name is XXXXX, a Case Manager here at Airbnb. We will surely assist you with your concern.We understand your situation. I believe you've spoken with your guest about the cancellation. However before proceeding with your request to cancel this reservation XXXXX with guest XXXXX. We just wanted to reconfirm the final status of this reservation. Do you still want to cancel this reservationXXXXX, were in agreement with XXXXX to cancel due to PG&E power outage.Airbnb SupportAirbnb Support237 PMThank you for your prompt response. Your reservation is canceled now and your guest has been refunded in full. No penalties for you. We hope that power restored 100% in the area soon.Resolution Adjustment XXXXX.35Oct 27, 2019Resolution adjustment for resolution 15775187
	Residential	Sierra	A19135225	Power outage resulted in lost wages due to restaurant XXXXX where I work. Business closed 10/9, 10/10, 10/23, 10/28 & 10/30. I can send in pay stubs if needed.
	Residential	Sierra	A19135283	Public power safety outage caused extreme anxiety for my daughter, who is autistic and battles anxiety. The fear of another night in the dark without power during the previous which she did not sleep, was unable due to anxiety and fear caused us to have to find a hotel for the night in order to keep her calm and allow her to sleep. Electricians were backed up and unable to come wire our home for a generator. We have since purchased a generator and had our home wired so she will not have to endure such severe hardship due to power outage again. Local hotels with suites were fully booked, we were forced to travel to Sacramento to find accommodations that could meet her needs.
	Residential	Sierra	A19135765	upon initial power outage, pressure build up from water pump/ high volume well burst pipe at well which was embedded in concrete and cause switch an tank up 4 acres to remain on in tank house for 2 months causing triple PG&E bills.
	Residential	Sierra	A19135776	I live in fear that your equipment will start a fire. Until the first big rain I found I could not sleep. I lost 1000.00 in refrigerator and freezer food the first time the power was shut off. Then I had to buy a generator and gas cans and hire someone to set it up for me 650.00. All this money and I live on a single pension. This has been devastating. And now I am finding your site here is not working properly. This is the 3rd time in 24 hours I have attempted to use it to tell you of this problem.
	Residential	Sierra	A19136556	Our power was shut off due to potential high winds that did not occur. Our power was out for approximately 40 hours. Despite purchasing ice, and working to keep food cool, we lost four hundred dollars in groceries and my husband lost two working days due to there being no internet and no cell phone reception. As a self employed lawyer this cost him at least twenty five hundred dollars plus the vacation he may to sacrifice to make up the time. We do save various grocery receipts. Our entire freezer and refrigerator defrosted, we kept as much cool/frozen as possible.
	Residential	Stockton	A19133094	The PG&E emergency power loss directly resulted in our household needing to buy ice, fuel, and a generator so as not to lose cold storage food goods, have heat, and have working phones for communication.
	Residential	Stockton	A19133830	CUSTOMER WILL LIKE TO GET REIMBURSEMENT FOR DAY MISSED AT WORK BECAUSE
	Residential	Stockton	A19133871	PSPS CAUSED AN OUTAGE AT WORKPLACE AND THEY TOLD HIM NOT TO COME IN
	Residential	Stockton	A19135333	PSPS outage losses
	Residential	Kern	A19133217	PGE notified me via Email and SMS that power is subject to be turned off due to improperly managed power infrastructure that is incapable of certain weather conditions. Contact was made to PG&E customer service giving notification that I have medical equipment that must be powered. Was advised that PG&E has no resources for me to power my equipment during a shut off. I was forced to purchase a back up battery pack for my CPAP machine to ensure my well being during an intentional shut off.

3	Commercial	North Bay	A19133916	We rent out an apartment through AirBnB and our guest canceled due to the power outage. We had to refund 243 dollars to them.
3	Commercial	North Bay	A19135884	See attached typed recap. Loss of business per the Power Safety Public Shut Off.
3	Commercial	North Coast	A19133899	Forced PGE Power Shut Off Caused Loss of Revenue
3	Commercial	North Coast	A19135007	Oct 23,24 and 25 shut down of power. Oct 27 through Nov 1 2019 power was shut down. These events rendered our business inoperable and resulted in loss revenue. Our 5 man crew were not able to perform regular service of our clients. 7 days of total lost time. Average revenue in a 30 day period is approx 100,000.00.
3	Commercial	Sierra	A19135732	power shutoffs
3	Commercial	Sierra	A19135733	POWER SHOUTOFFS
3	Commercial	Stockton	A19134722	power outage caused loss of business
3	Commercial	Stockton	A19134935	We received a safety alert that PG&E may turn off power on 10/23/2019 and it may be off more than 48 hours. It did actually go down on Wednesday so we were not able to open on Thursday.
3	Residential	North Coast	A19135481	The last two weeks of October, we were out of electricity in our home, and all of our foods went to waste because of no electricity. Also I was unable to work because the location of my job was under evacuation, therefore we had a week off. I lost six days of work because of it and I dont have a lot of receipts because I didnt save them because I wasnt thinking at the time. I have some copies of my wages from my work if that helps. Thank you.
3	Residential	Sierra	A19133918	You shut off our power AGAIN. Had to buy ice for the freezer and throw out condiments that had managed to be saved from the week before.
3	Residential	Sierra	A19133985	Unable to train my clients due to power outage. Gym closed.
3	Residential	Sierra	A19134007	I have expended 329 dollars to date for gas to run my generator just to keep my house hold functioning
3	Residential	Sierra	A19134260	PG&E shutoff my power for the third event causing me to buy an over priced generator and several days of gas.
3	Residential	Sierra	A19134630	PG&E cut our power for multiple days due to weather. This caused our generator to activate. The total cost of fuel is 372.00
3	Residential	Stockton	A19134012	I am small business owner and as a result of the numerous power outages have not been able to stay open and work. Therefore I have not been able to make the means that is needed to pay my bills.
4	Residential	Peninsula	A19134710	Extended outage required us to ensure safety in/around our home providing lighting and avoid food spoilage of our 2 freezers and 1 fridge. For this we rented a power generator.
5	Commercial	Central Coast	A19134066	You turned off our power.
5	Commercial	Central Coast	A19134067	You turned off our power.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_020-Q01		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_020-Q01		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 24, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Medical Baseline Customers at risk of de-energization

QUESTION 01

For Medical Baseline Customers, please explain in full and complete detail:

- a) How PG&E identified these customers, including but not limited to what records PG&E maintains in the regular course of business that tracks the identity, status and contact details of these customers, what regulatory mandates, if any, require such records, and how frequently those records were updated in 2019;
- b) What steps PG&E took to provide notice to these customers for each of the October 2019 de-energization events, including but not limited to:
 - The manner of notice provided (e.g. telephone/written/other electronic) and please provide examples of this;
 - What records, if any, exist or are available to support the steps that PG&E took in this regard.
 - The number of PG&E staff who were responsible for providing said notice prior to the October 2019 PSPS event, including their divisions or departments within PG&E;
- c) Please fill in the following table regarding the number of Medical Baseline Customers notified in advance:

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
No. of Medical Baseline Customer Accounts affected by the PSPS event			
No. of Medical Baseline Customer Accounts notified at least 24 hours in advance of the PSPS event			
No. of Medical Baseline Customer Accounts notified less than 24 hours but over 4 hours in advance of the PSPS 6 event			
No. of Medical Baseline Customer Accounts Notified less than 4 hours in advance of the PSPS event			

- d) What steps PG&E took to mitigate the inconvenience or negative consequences that the October 2019 de-energization events would cause to these customers prior to the events?

ANSWER 01

- a) PG&E identifies medical baseline customers, including medical baseline tenants of master metered customers, through the medical baseline allowance program enrollment process. On an annual basis, PG&E conducts outreach to its customers to encourage enrollment in the program. For 2019, this outreach is described in PG&E's September 4, 2019 and March 4, 2020 PSPS Progress reports (section 3). Customers of record (e.g., not tenants of master metered account) that successfully enroll in PG&E's medical baseline allowance program are tracked in PG&E's system of record, Customer Care and Billing Solutions (CC&B). This database tracks many different billing-related data records regarding this customer, such as contact information, account number, rate, electric usage, etc. Specifically related to the medical baseline program, PG&E maintains the following information in CC&B for customers of record: contact information and preferences, date of certification/enrollment, date of expired program eligibility permanent or temporary condition, life support designation, and program removal date.

For tenants of master metered accounts, given these applicants are not the customer of record with PG&E, we maintain a separate database of master metered medical baseline customers in order to execute notifications for PSPS events in the same way customers of record that are enrolled in the MBL program receive event

notifications. In this tenant of master metered medical baseline database, PG&E maintains the following information: Tenant name and contact information, property manager/landlord account information (e.g., account number), date of certification/enrollment, permanent or temporary condition, life support designation, removal date.

Records are updated when a new application or recertification is received or when a customer contacts the Customer Contact Center or the local office. Program participants are automatically unenrolled based on the program removal date that is determined on enrollment. PG&E processes removals through automation and customer request. Due to COVID-19, as described in PG&E Advice Letter Advice 4244-G-A/5816-E-A, PG&E is not removing any customers until at the earliest April 21, 2021, or as otherwise directed by the CPUC.

- b) PG&E describes the steps it took to notify its medical baseline customers in each post-event ESRB-8 report (Section 6 – Customer notifications) and in PG&E’s Opening Testimony, pp. 3-19 through 3-20. The automated notification scripts used for the customers, including the notifications specific to medical baseline customers and the tenants of master metered medical baseline customers, are found in the Appendix of each ESRB-8 report. Additionally, at times, PG&E conducts “wellness calls” and door knocks if the customer does not confirm receipt of their notification. *De-EnergizePowerLines_DR_CalAdvocates_011-Q01Atch01.docx* includes the wellness call scripts, as well as the door knock scripts. *De-EnergizePowerLines_DR_CalAdvocates_011-Q01Atch02.pdf* is an example of PG&E’s doorhanger that was left at customers’ premise if no one answered the door. *De-EnergizePowerLines_DR_CalAdvocates_011-Q01Atch03.pdf* documents the 2019 medical baseline notification process, including door knocks.

Further documentation of the notification process is provided in the following documents:

- Notification Completion Reporting: This is a report issued by PG&E’s notification vendor, Message Broadcast, which details the number of notification attempts for each customer and the results of their notification (e.g., phone answered, machine, text delivered, text acknowledged, etc.).
- Door Knock Reporting: This report is generated by PG&E’s Field Automation System, which issues service tags to deploy personnel into the field with specific service request, in this instance, providing a visit to the home to serve as a medical baseline door knock. Outcomes of the door knocks are reported.

The resources involved in sending customer notifications, and providing medical baseline customer door knocks are extensive, and include multiple staff on a rotation to serve in these functions, with varied level of staffing based on the

timing of the shift (day vs. night shift). The following are the nine key groups involved in the medical baseline customer notification process:

1. **PG&E's Emergency Operations Center's (EOC) Planning team** identifies customers impacted, including medical baseline customers, based on scope of the event and develop the files to be used for the customer notifications.
 2. **PG&E's Information Technology (IT) team** builds and maintains tools (e.g., PSPS Viewer) to enable the Planning team to create customer notification files based on event scope.
 3. **PG&E's EOC Customer Strategy Officer (CSO) and Officer In Charge (OIC)** approve notifications to be sent to customers, based on the files created by and notification scripts developed in advance and/or during the event if an "ad hoc" script is created based on the circumstance.
 4. **PG&E's Customer Contact Emergency Coordination Center (CCECC)** reviews the notification files to conduct a quality control of the notification files (e.g., confirm content, format, variables). Once quality control (QC) is complete, they prepare notifications files and provide the files to PG&E's notification vendors: Message Broadcast (used for mass PSPS customer notifications) and Broadnet (alternate vendor used for custom and/or Transmission-level customer notifications). Additionally, the CCECC partners with Billing Operations to query the Master Meter Medical Baseline Tenant (MMT) database to acquire the tenant contact information. Billing Ops provides the list of MMT's to CCECC, who prepares notification files and provides to PG&E's alternate notification vendor, Broadnet.
 5. **Message Broadcast** (vendor) sends the automated customer notifications and reports the outcomes of notifications, which are used for both event reporting and determining if door knocks are needed.
 6. **Broadnet** (vendor) sends the automated customer notifications to MMT's and reports the outcomes of notifications, which are used for both reporting and determining if door knocks are needed.
 7. **Billing Operations** maintains a separate Medical Baseline database that syncs with CC&B. It is used to track all customers on Medical and/or Life Support to identify when a recertification is due. Additionally, Billing uses this database to pull Master Meter tenant contact information to use during PSPS events
 8. **PG&E's Electric and Gas Dispatch Teams** coordinate field personnel and staffing needed for conducting door knocks to medical baseline customers that did not confirm receipt of their notification.
 9. **PG&E's Field Metering and Gas Field Service** crews are then dispatched into the field to conduct the medical baseline door knocks, and the scale of the team depends on the scale of the event. which then influence the number of field personnel that are deployed to conduct customer door knocks.
- c) See the following table as requested for the medical baseline customers notifications, which include a combination of Message Broadcast and door knocks.

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
No. of Medical Baseline Customer Accounts affected by the PSPS event	30,301	7,939	35,950
No. of Medical Baseline Customer Accounts notified at least 24 hours in advance of the PSPS event	27,127	7,686	30,112
No. of Medical Baseline Customer Accounts notified less than 24 hours but over 4 hours in advance of the PSPS event	2,585	231	4,936
No. of Medical Baseline Customer Accounts Notified less than 4 hours in advance of the PSPS event	0	0	0
No. of Medical Baseline Customer Accounts not notified in advance at all	589	22	902

- d) PG&E objects to this data request on the grounds that efforts to “mitigate the inconvenience or negative consequences” of PSPS events are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving this objection, PG&E provides the following response. Section 3 “Outreach” in PG&E’s September 4, 2019 Progress Report; PG&E’s Opening Testimony, pp. 1-3 and 3-1 through 3-4; and the “Executive Summary” and “Customer Notifications” sections in each of PG&E’s post-event ESRB-8 reports discuss some of PG&E’s efforts to mitigate inconvenience to customers, including Medical Baseline customers.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_020-Q02		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_020-Q02		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Medical Baseline Customers at risk of de-energization

QUESTION 02

Prior to the October 2019 de-energization events,

- a) What did PG&E define as an “effective communication and notification campaign” for any of its upcoming de-energization events in general? Please provide supporting documents dated before October 2019 as evidence.
- b) If PG&E took steps to identify, provide notice, and mitigate the harm to its customers at risk of de-energization:
 - i. What targets did PG&E set for reaching of all or some of its customers or groups with PSPS notifications as required by the De-Energization Guidelines set forth in Decision 19-05-042? Please identify the targets set for the following:
 - All of its customers,
 - Medical baseline customers,
 - Critical facilities,
 - Industrial customers,
 - Public Safety Partners, and
 - Priority Notification Entities?
 - ii. How did PG&E determine **each** target set, please include an explanation of any modeling used in setting the target, if any, and when the target was set or determined;
 - iii. Ultimately, what percentage of these customer accounts were not notified in advance for each of the October 2019 PSPS events? Please provide supporting documentation.

ANSWER 02

- a) As used in this context, PG&E would define effective outreach communication to include both customer awareness of the issues surrounding de-energization events and customer satisfaction with such communications, as well as customer actions taken as a result of the communications (e.g., steps taken to prepare for de-energization event, such as updating customer contact information). See PG&E's Wildfire Safety Survey 2019 results, filed on June 1, 2020, which includes a summary of the 2019 outreach awareness and effectiveness survey results, which documented two waves of customer research conducted prior to the October 2019 PSPS events. The surveys captured awareness and recall of PG&E's customer outreach, level of satisfaction, including understanding and usefulness of communications, and actions taken as a result of the communications.

Please also see Section 4.6.3 "PSPS Notification Strategies" in PG&E's 2019 Wildfire Mitigation Plan; Sections 3 "Outreach" and 4.1 "Notifications" in PG&E's September 4, 2019 Progress Report; Chapter 3 of PG&E's Opening Testimony; and the "Customer Notifications" section of each of PG&E's post-event ESRB-8 reports for an explanation of PG&E's communication, notification, and outreach efforts.

- b) PG&E did not set as a formal target to notify only a subset of its customers; rather, PG&E strove to directly notify each customer within the scope of a PSPS outage, using a variety of channels, before that customer was de-energized.

As stated in PG&E's Rebuttal Testimony, p. 3-2, PG&E directly notified over 97% of customers impacted by the October 2019 PSPS events, and fewer than 3% of customers were not directly notified in advance. Please refer to the "Customer Notifications" section in each of PG&E's post-event ESRB-8 reports for the numbers of customers who were impacted, notified, and missed notifications for each PSPS event.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_020-Q03		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_020-Q03		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Medical Baseline Customers at risk of de-energization

QUESTION 03

If PG&E did not provide notice to the medical baseline customers / for those medical baseline customers whom PG&E did not provide the required notification,

- a) Has PG&E made any assessment of what it would have cost to notify these customers otherwise (e.g. the cost to local governments)?
- b) Has PG&E made any assessment of whether the cost to notify these customers would increase directly with increasing proximity to the PSPS event (e.g. due to the need to go door-to-door and knock)?

ANSWER 03

PG&E objects to this data request as vague and ambiguous because it is unclear what is meant by “cost to notify these customers otherwise.” PG&E interprets the reference to “cost[s]” in (a) and (b) to refer to “costs to others,” in light of the parenthetical reference to “cost to local governments.”

Subject to and without waiving its objections, PG&E responds as follows: PG&E has not assessed the costs that the third parties identified in this question would incur in order to notify customers.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_020-Q04		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_020-Q04		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

PG&E's Corrective Actions and Remedies Post-October 2019 De-Energization Events

QUESTION 04

Please fill out the following table regarding corrective actions and remedies **(specifically for the communication and notification of de-energization events)** that PG&E took or plans to take after the October 2019 de-energization events:

Description of the Corrective Actions or Remedies (specifically for the communication and notification of de-energization events) prior to the 2020 Wildfire Season	Status: Has PG&E taken such corrective actions or remedies yet?	When does PG&E plan to take such corrective actions or remedies?
Correction Action #1: <Description of the PG&E's Action Item for improving the communication and notification of future de-energization events>		

ANSWER 04

PG&E interprets the term “corrective actions and remedies” to refer to planned improvements to direct customer notifications for PSPS events in the 2020 wildfire season. The following describe PG&E’s key initiatives to improve customer notifications in 2020.

Corrective Action	Status
Data Driven Improvement to Notification Process and Verbiage	
PG&E conducted online surveys and interviews with healthcare professionals, to gain feedback on	Completed in November 2019

<p>the Medical Baseline enrollment and notification processes, among other things.</p>	<p>Completed in December 2019</p>
<p>PG&E aggregated customer input collected through online surveys completed by customers on PGE.com and social media content shared by customers. Among other things, PG&E identified opportunities for improved content of customer notifications.</p>	<p>Completed in January 2020</p>
<p>PG&E conducted surveys with Medical Baseline customers to measure their PSPS experience, including, among other things, their notification experience, how frequently they were notified, and how they would prefer PG&E to communicate during PSPS events.</p>	<p>Completed in March 2020</p>
<p>PG&E reviewed its notification templates to incorporate feedback and recommendations from public safety partners and the general public. PG&E performed notification message testing to test the messages used in notifications sent to customers and update the script verbiage, as needed. In 2020, notifications will include more detail about the location and the length of the event, including estimated shutoff and restoration times. Notifications will highlight critical information, including street/address information, and estimated shutoff and restoration times, and include links to resources for Access and Functional Needs populations. Additionally, PG&E updated the Medical Baseline customer notifications with improved instructions and options to acknowledge notification receipt to prevent the need for an in-person visit (“door knocks”).</p>	<p>On track for completion of planned scope in September 2020</p>
<p>PG&E is making improvements to its translated notifications and website. As of July 2020, PG&E has made translated notifications available in Spanish, Chinese, Tagalog, Vietnamese, Korean, and Russian, and is working to make notifications available in an expanded list of languages, including Arabic, Punjabi, Farsi, Japanese, Khmer, and Hmong. The expanded list of languages was selected based on the CPUC’s definition and data sources to determine language prevalence per D.20-03-004, and as described in PG&E Outreach</p>	

plan in Advice Letter 4249-G/5827-E filed on May 15, 2020.	
Confirmation of Customer Contact Information	
For the 2020 wildfire season, PG&E has expanded its efforts to obtain and verify customer contact information for general customers. These efforts included direct mail, outcall campaigns, social media posts, website popups, bill inserts, and monthly emails to subgroups of electric customers, requesting that they provide or confirm their contact information.	As of June 2020, PG&E has reduced the total number of customers with no or invalid contact information by 75% (from approximately 68,000 to less than 17,000). Of this population, the number of Medical Baseline customers with no or invalid contact information was reduced by 90% (from approximately 800 customers to 80).
PG&E is also conducting direct outreach with all large commercial customers in Tier 2 and Tier 3 HFTDs areas, and critical facilities (regardless of location). This outreach is focused on confirming contact information, providing a general overview of PG&E's wildfire mitigation efforts and PSPS preparedness information, shared resources about safety and solutions for backup power, among other things.	<p>Direct outreach to large and critical customers in Tier 2 and Tier 3 areas complete between April and June 2020.</p> <p>All critical customers not located in a Tier 2/3 HFTD will receive email and letters with related preparedness information.</p>
PG&E conducted outreach to the CPUC and Cal OES, and all cities, counties and tribes in its territory between May and July to request and confirm updated 24-hour primary and secondary points of contact the Company has on file. This contact information will be leveraged for PSPS outreach and event notifications to Public Safety Partners.	This outreach was completed between May and July 2020.
Using Structured Query Language (SQL), PG&E developed a consistent approach to identify critical facilities in its territory based on customer account attributes, and assigned as critical accordingly. The automated review is supplemented and verified by local experts and account managers to confirm that sites are accurately characterized as critical. Subsequently, these lists were shared (confidentially on the PSPS Portal) with local governments and tribes to validate and/or add sites that met the CPUC criteria in advance of wildfire season. The critical facility identifier will be used to obtain up-to-date contact information for critical facilities and to prioritize PSPS notifications to critical facilities in advance of general customers.	This process was initiated in April 2020 and input from agencies complete in July 2020.
To test the updated notification system prior to the 2020 wildfire season, PG&E is including notification testing in two of its three its PSPS exercises, including testing both the agency- and customer-related notification systems.	Notification testing conducted in July 15-17 exercises, and planned in August 3-7 exercise.
Improvements to PSPS Event Implementation	

PG&E is developing automated processes to replace certain manual steps in the process of identifying impacted PG&E assets and customers, which resulted in some missed notifications in 2019. PG&E has deployed in the PSPS viewer a process to trace circuits from a meteorological polygon to automatically determine the devices to be used in a PSPS event.	Completed in June 2020
PG&E launched 3 projects to improve data quality and cleanup efforts to address the transformer mapping and customer mapping issues that resulted in some missed notifications in 2019. Two of those are complete, a third is underway in Q3. PG&E believes the completed projects address 70%+ of the issues.	2 completed in June, 3rd underway to be completed by year-end 2020.
Due to the complex nature of transmission customer impact evaluation, PG&E is actively identifying process improvement opportunities for identifying and notifying transmission customers and entities during a PSPS event, which would allow for them to receive notifications sooner. Among other things, PG&E will automate aspects of the transmission customer notification process in 2020 and will continue to support these customers through support from both the Critical Infrastructure lead, and the Grid Control Center (GCC) operators.	Process complete to automate advanced notifications for Transmission customers in 2020

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 020-Q05		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 020-Q05		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Cost Analysis of October 2019 De-Energization Events Beforehand

QUESTION 05

What cost-benefit assessment, analysis, or calculations of de-energization events did PG&E carry out before executing the October 2019 de-energization events? Please provide the assumptions, methodologies, results, and supporting documentation as evidence of such assessment, analysis, or calculations.

ANSWER 05

PG&E objects to this data request on the grounds that the de-energization decision-making process, and the costs and benefits of de-energization events, are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving its objection, PG&E responds as follows: PG&E de-energizes portions of its grid when PG&E concludes that doing so is necessary to avoid a significant risk of a catastrophic wildfire.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 020-Q06		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 020-Q06		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Cost Analysis of October 2019 De-Energization Events Beforehand

QUESTION 06

Before executing the October 2019 de-energization events, how did PG&E estimate the added costs to public safety partners, local governments, and PG&E's customers in the event that PG&E fails to communicate and notify any of the de-energization events to these entities or customers? Please provide the assumptions, methodologies, results, and supporting documentation as evidence of such assessment, analysis, or calculations.

ANSWER 06

PG&E objects to this data request on the grounds that the de-energization decision-making process, and the costs and benefits of de-energization events, are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving its objection, PG&E responds as follows: Please see the response to Question 5.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_020-Q07		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_020-Q07		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Cost Analysis of October 2019 De-Energization Events Beforehand

QUESTION 07

How did PG&E estimate the costs of each October 2019 de-energization event that would be imposed on its customers prior to the events? Please provide supporting documentation as evidence.

ANSWER 07

PG&E objects to this data request on the grounds that the de-energization decision-making process, and the costs and benefits of de-energization events, are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving its objection, PG&E responds as follows: Please see the response to Question 5.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_020-Q08		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_020-Q08		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Cost Analysis of October 2019 De-Energization Events Beforehand

QUESTION 08

Please describe **in detail** the steps PG&E took (e.g., the steps taken before and after the events) to mitigate the impact of each of the October 2019 de-energization events to PG&E's customers?

ANSWER 08

PG&E objects to this data request on the grounds that efforts to "mitigate the impact" of PSPS events are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving this objection, PG&E provides the following response. Section 3 "Outreach" in PG&E's September 4, 2019 Progress Report; PG&E's Opening Testimony, pp. 1-3 and 3-1 through 3-4; and the "Executive Summary" and "Customer Notifications" sections in each of PG&E's post-event ESRB-8 reports discuss some of PG&E's efforts to mitigate inconvenience to customers, including Medical Baseline customers.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_020-Q09		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_020-Q09		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Cost Analysis of October 2019 De-Energization Events Beforehand

QUESTION 09

For the October 2019 de-energization events, what did PG&E—both intentionally and unintentionally—rely on the local governments to ensure that the condition of the deenergized community remains safe?

ANSWER 09

PG&E objects to this data request on the grounds that coordination efforts with local governments on the matters identified in Question 9 are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving this objection, PG&E responds as follows: In its Opening Testimony, p. 1-4, PG&E describes its coordination and collaboration with local governments and public safety partners. The “Local and State Public Safety Partner Engagement” section of PG&E’s post-event ESRB-8 reports provides further information about PG&E’s efforts to coordinate with local governments.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_020-Q10		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_020-Q10		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

The Role of Websites & Data Transfer Portal

QUESTION 10

As missing and outdated customers' contact information is an "industry-wide challenge,"³ what were the roles of a well-functioning website and an accessible data transfer portal to PG&E? Please answer specifically for the time period starting from the beginning of the 2019 Wildfire Season until the last de-energization event in October 2019.

ANSWER 10

PG&E recognizes that providing information to customers requires a multi-prong strategy, and so seeks to deliver information through a variety of channels, including the Company's website. As such, during the time period starting from the beginning of the 2019 wildfire season through the last de-energization event in November 2019, the website was a conduit through which information could be provided to PG&E's customers, Public Safety Partners, and the general public.

PG&E also makes certain information available through its data transfer portal to Public Safety Partners. Public Safety Partners, not general customers, were the primary consumers of the information provided through PG&E's data transfer portal during the time period starting from the beginning of the 2019 wildfire season through the last de-energization event in November 2019.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 020-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 020-Q01Rev01		
Request Date:	July 6, 2020	Requester DR No.:	020
Date Sent:	July 24, 2020 Revised: August 19, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Medical Baseline Customers at risk of de-energization

QUESTION 01

For Medical Baseline Customers, please explain in full and complete detail:

- a) How PG&E identified these customers, including but not limited to what records PG&E maintains in the regular course of business that tracks the identity, status and contact details of these customers, what regulatory mandates, if any, require such records, and how frequently those records were updated in 2019;
- b) What steps PG&E took to provide notice to these customers for each of the October 2019 de-energization events, including but not limited to:
 - The manner of notice provided (e.g. telephone/written/other electronic) and please provide examples of this;
 - What records, if any, exist or are available to support the steps that PG&E took in this regard.
 - The number of PG&E staff who were responsible for providing said notice prior to the October 2019 PSPS event, including their divisions or departments within PG&E;
- c) Please fill in the following table regarding the number of Medical Baseline Customers notified in advance:

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
No. of Medical Baseline Customer Accounts affected by the PSPS event			
No. of Medical Baseline Customer Accounts notified at least 24 hours in advance of the PSPS event			
No. of Medical Baseline Customer Accounts notified less than 24 hours but over 4 hours in advance of the PSPS 6 event			
No. of Medical Baseline Customer Accounts Notified less than 4 hours in advance of the PSPS event			

- d) What steps PG&E took to mitigate the inconvenience or negative consequences that the October 2019 de-energization events would cause to these customers prior to the events?

ANSWER 01 REVISED 01

- a) PG&E identifies medical baseline customers, including medical baseline tenants of master metered customers, through the medical baseline allowance program enrollment process. On an annual basis, PG&E conducts outreach to its customers to encourage enrollment in the program. For 2019, this outreach is described in PG&E's September 4, 2019 and March 4, 2020 PSPS Progress reports (section 3). Customers of record (e.g., not tenants of master metered account) that successfully enroll in PG&E's medical baseline allowance program are tracked in PG&E's system of record, Customer Care and Billing Solutions (CC&B). This database tracks many different billing-related data records regarding this customer, such as contact information, account number, rate, electric usage, etc. Specifically related to the medical baseline program, PG&E maintains the following information in CC&B for customers of record: contact information and preferences, date of certification/enrollment, date of expired program eligibility permanent or temporary condition, life support designation, and program removal date.

For tenants of master metered accounts, given these applicants are not the customer of record with PG&E, we maintain a separate database of master metered medical baseline customers in order to execute notifications for PSPS events in the same way customers of record that are enrolled in the MBL program receive event

notifications. In this tenant of master metered medical baseline database, PG&E maintains the following information: Tenant name and contact information, property manager/landlord account information (e.g., account number), date of certification/enrollment, permanent or temporary condition, life support designation, removal date.

Records are updated when a new application or recertification is received or when a customer contacts the Customer Contact Center or the local office. Program participants are automatically unenrolled based on the program removal date that is determined on enrollment. PG&E processes removals through automation and customer request. Due to COVID-19, as described in PG&E Advice Letter Advice 4244-G-A/5816-E-A, PG&E is not removing any customers until at the earliest April 21, 2021, or as otherwise directed by the CPUC.

- b) PG&E describes the steps it took to notify its medical baseline customers in each post-event ESRB-8 report (Section 6 – Customer notifications) and in PG&E’s Opening Testimony, pp. 3-19 through 3-20. The automated notification scripts used for the customers, including the notifications specific to medical baseline customers and the tenants of master metered medical baseline customers, are found in the Appendix of each ESRB-8 report. Additionally, at times, PG&E conducts “wellness calls” and door knocks if the customer does not confirm receipt of their notification. *De-EnergizePowerLines_DR_CalAdvocates_011-Q01Atch01.docx* includes the wellness call scripts, as well as the door knock scripts. *De-EnergizePowerLines_DR_CalAdvocates_011-Q01Atch02.pdf* is an example of PG&E’s doorhanger that was left at customers’ premise if no one answered the door. *De-EnergizePowerLines_DR_CalAdvocates_011-Q01Atch03.pdf* documents the 2019 medical baseline notification process, including door knocks.

Further documentation of the notification process is provided in the following documents:

- Notification Completion Reporting: This is a report issued by PG&E’s notification vendor, Message Broadcast, which details the number of notification attempts for each customer and the results of their notification (e.g., phone answered, machine, text delivered, text acknowledged, etc.).
- Door Knock Reporting: This report is generated by PG&E’s Field Automation System, which issues service tags to deploy personnel into the field with specific service request, in this instance, providing a visit to the home to serve as a medical baseline door knock. Outcomes of the door knocks are reported.

The resources involved in sending customer notifications, and providing medical baseline customer door knocks are extensive, and include multiple staff on a rotation to serve in these functions, with varied level of staffing based on the

timing of the shift (day vs. night shift). The following are the nine key groups involved in the medical baseline customer notification process:

1. **PG&E's Emergency Operations Center's (EOC) Planning team** identifies customers impacted, including medical baseline customers, based on scope of the event and develop the files to be used for the customer notifications.
 2. **PG&E's Information Technology (IT)** team builds and maintains tools (e.g., PSPS Viewer) to enable the Planning team to create customer notification files based on event scope.
 3. **PG&E's EOC Customer Strategy Officer (CSO) and Officer In Charge (OIC)** approve notifications to be sent to customers, based on the files created by and notification scripts developed in advance and/or during the event if an "ad hoc" script is created based on the circumstance.
 4. **PG&E's Customer Contact Emergency Coordination Center (CCECC)** reviews the notification files to conduct a quality control of the notification files (e.g., confirm content, format, variables). Once quality control (QC) is complete, they prepare notifications files and provide the files to PG&E's notification vendors: Message Broadcast (used for mass PSPS customer notifications) and Broadnet (alternate vendor used for custom and/or Transmission-level customer notifications). Additionally, the CCECC partners with Billing Operations to query the Master Meter Medical Baseline Tenant (MMT) database to acquire the tenant contact information. Billing Ops provides the list of MMT's to CCECC, who prepares notification files and provides to PG&E's alternate notification vendor, Broadnet.
 5. **Message Broadcast** (vendor) sends the automated customer notifications and reports the outcomes of notifications, which are used for both event reporting and determining if door knocks are needed.
 6. **Broadnet** (vendor) sends the automated customer notifications to MMT's and reports the outcomes of notifications, which are used for both reporting and determining if door knocks are needed.
 7. **Billing Operations** maintains a separate Medical Baseline database that syncs with CC&B. It is used to track all customers on Medical and/or Life Support to identify when a recertification is due. Additionally, Billing uses this database to pull Master Meter tenant contact information to use during PSPS events
 8. **PG&E's Electric and Gas Dispatch Teams** coordinate field personnel and staffing needed for conducting door knocks to medical baseline customers that did not confirm receipt of their notification.
 9. **PG&E's Field Metering and Gas Field Service** crews are then dispatched into the field to conduct the medical baseline door knocks, and the scale of the team depends on the scale of the event. which then influence the number of field personnel that are deployed to conduct customer door knocks.
- c) PG&E is amending its initial response submitted on July 24, 2020 to Question 1 Subpart C to correct certain details concerning the "Description" of customers used in the requested table. PG&E is providing an updated table reflecting the correct "Description".

In PG&E's initial response, PG&E did not clarify that the table requested included Customer counts by Service Point ID (SPID) rather than Customer Account. SPID is the standard characteristic used in PG&E's reporting. Please see the updated table below to replace the initial table submitted on July 24, 2020.

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
No. of Medical Baseline SPIDs affected by the PSPS event	30,301	7,939	35,950
No. of Medical Baseline SPIDs notified at least 24 hours in advance of the PSPS event	27,127	7,686	30,112
No. of Medical Baseline SPIDs notified less than 24 hours but over 4 hours in advance of the PSPS event	2,585	231	4,936
No. of Medical Baseline SPIDs Notified less than 4 hours in advance of the PSPS event	0	0	0
No. of Medical Baseline SPIDs not notified in advance at all	589	22	902

- d) PG&E objects to this data request on the grounds that efforts to “mitigate the inconvenience or negative consequences” of PSPS events are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving this objection, PG&E provides the following response. Section 3 “Outreach” in PG&E's September 4, 2019 Progress Report; PG&E's Opening Testimony, pp. 1-3 and 3-1 through 3-4; and the “Executive Summary” and “Customer Notifications” sections in each of PG&E's post-event ESRB-8 reports discuss some of PG&E's efforts to mitigate inconvenience to customers, including Medical Baseline customers.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 021-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 021-Q01		
Request Date:	July 6, 2020	Requester DR No.:	021
Date Sent:	July 20, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: PG&E's PROCEDURE FOR ADVANCED NOTIFICATION

QUESTION 01

For the PG&E's October 2019 de-energization events, what was PG&E's procedure for notifying entities in advance of a de-energization event with multiple physical addresses or facilities under a single customer account?

- a) Taking Cal Fire as an example for public safety partners, did PG&E notify every Cal Fire address or facility? Or, did PG&E notify the main contact of Cal Fire once with the list of facilities or addresses that would be de-energized?
- b) Please cite to any Commission's decisions, rules, or PG&E's internal standards for the communication and notification procedure that PG&E followed in its response to part (a) of this question.
- c) Similar to the situation described in part (a), for entities or customers with multiple physical addresses under a single customer account, did PG&E have different de-energization event notification procedures for:
 - i. priority notification entities (other than public safety partners),¹
 - ii. commercial customers,
 - iii. agricultural customers,
 - iv. industrial customers, and
 - v. Other customers?

If yes, please explain in detail.

ANSWER 01

- 1.a. For the October 2019 PSPS events, PG&E's September 4, 2019 PSPS Progress Report (section 4) provides an overview of PG&E's notification process, including the notification timelines (Appendices C-E). PG&E's Opening Testimony, pp. 3-17 through 3-20, and PG&E's Rebuttal Testimony, pp. 3-6 through 3-8, provide further information about the notification process in 2019.

¹ See Decision 19-05-042, pp. 84 to 85.

For customers that have either a single premise or more than one premise (multi-premise), the same steps are taken to issue notifications, however, the built-in logic in PG&E's notification delivery is different for single and multi-premise customers. This built-in logic is described below:

- Given PSPS-related notifications are emergency-related customer communications, PG&E notifies all contacts (phone, text, email) associated with a customer's Service Point ID (SPID), regardless of notification preferences set by the customer.
- For every wave of notifications sent, critical facility customers are prioritized (sent before general customers).
- A multi-premise notification is issued when a unique combination of Contact information (Phone number / Email address) and Channel (Email, Text, IVR Call) within a given notification file.
- If a combination of Channel and Contact Information is associated with more than 1 unique SP ID, then the notifications would be combined into a single Multi-Premise notification.
- The example shown below helps demonstrate:

Notification File	Channel	Contact Information	SP ID	Multi-Prem Notice Sent
1	Text	1234	SPID A	N
1	Phone Call	1234	SPID B	N
1	Text	5678	SPID C	Y
1	Text	5678	SPID D	
1	Text	5678	SPID E	

- For the table above, the records associated with Contact Information 1234, there would be 2 different Single Premise notifications because of the 2 different Channels.
- For the table above, the records associated with Contact Information 5678, these rows would be grouped into 1 Multi-Premise notification.
- To note, this logic applies only within a single notification file (e.g., notification wave). If the same records were spread over several files, they would receive another notification with the same logic applied. For the table below, because the same records are spread over multiple notification files, these same records would now result in 2 Single Premise notifications for Contact Information 1234 and 3 Single Premise notifications for Contact Information 5678.

Notification File	Channel	Contact Information	SP ID	Multi-Prem Notice Sent
1	Text	1234	SPID A	N
1	Phone Call	1234	SPID B	N
1	Text	5678	SPID C	N

2	Text	5678	SPID D	N
3	Text	5678	SPID E	N

In addition, for transmission-level customers that are multi-premise, PG&E provided notifications about which of the premises would be impacted by a PSPS event in the manner described in PG&E's Rebuttal Testimony, pp. 3-6 through 3-8.

- 1.b. PG&E's followed notification processes followed appropriate guidelines per Decision 19-05-042 and Resolution ESRB-8. PG&E's internal standard is described in response to part 1.a.
- 1.c. See response to part 1.a.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
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Request Date:	July 6, 2020	Requester DR No.:	021
Date Sent:	July 24, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: STATISTICS OF PG&E'S OCTOBER 2019 DE-ENERGIZATION EVENTS

QUESTION 02

The De-Energization Guidelines set forth in Appendix A to Decision 19-05-042 state that:

The electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline:

- 48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities
- 24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations
- 1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations
- When de-energization is initiated: notification of all affected customers/populations
- Immediately before re-energization begins: and notification of all affected customers/populations
- When re-energization is complete: notification of all affected customers/populations¹

In light of the De-Energization Guidelines above, please fill in the three tables (Tables 1 to 3) below with the appropriate number of public safety partners/priority notification entities, all other affected customers/populations, and all affected customers/populations notified as indicated for PG&E's October 2019 de-energization events.

¹ Decision 19-05-042, pp. A8 to A9.

TABLE 1
PUBLIC SAFETY PARTNERS/PRIORITY NOTIFICATION ENTITIES
(IN TERMS OF THE NUMBER OF ADDRESS_ID²)³

Line No.	Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
1	Number of Address_ID of public safety partners/priority notification entities who did not receive 48- to 72-hour advanced notification			
2	Among the number of Address_ID of public safety partners/priority notification entities who did not receive 48 to 72-hour advanced notification, number of Address_ID of public safety partners who did not receive 1- to 48-hour advanced notification as well			

TABLE 2
ALL AFFECTED CUSTOMERS/POPULATIONS OTHER THAN
PUBLIC SAFETY PARTNERS/PRIORITY NOTIFICATION ENTITIES
(IN TERMS OF THE NUMBER OF ADDRESS_ID)⁴

Line No.	Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
1	Number of Address_ID of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification			
2	Among the number of Address_ID of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification, number of Address_ID of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to 24-hour advanced notification as well			

2 An Address_ID provides a way for PG&E to identify distinctive addresses of PG&E's customers. For example, a customer, under a single customer account (represented by a unique Customer_ID) can have multiple unique Address_ID's to distinguish the various physical locations of the customer's facilities.

3 For example, if CalFire has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the number of distinctive facilities would be reported as six.

4 For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the number of distinctive entities would be reported as one. This is because the priority notification entity counts as a single entity.

TABLE 3
ALL AFFECTED CUSTOMERS/POPULATIONS
(IN TERMS OF THE NUMBER OF ADDRESS_ID)⁵

Line No.	Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
1	Number of Address_ID of ALL impacted customers who did not receive any advance notification before a de-energization event was initiated			
2	Number of Address_ID of ALL impacted customers who did not			
3	receive notification immediately before their power was turned back on			
4	Number of Address_ID of ALL impacted customers who did not receive notification when re-energization was completed			

ANSWER 02

During the October 2019 PSPS events, PG&E provided advanced notification to public safety partners. This includes automated notifications to cities, counties, state agencies, tribes, community choice aggregators, and publicly-owned utilities. PG&E does not notify these entities by address.

In July 2019, PG&E began conducting outreach to each jurisdiction to review and finalize a list of contacts that would be notified if their jurisdiction were to be impacted during a PSPS event. The number and type of contacts vary for each jurisdiction. Contacts often includes County Office of Emergency Services Directors, fire chiefs, police departments, city managers, tribal chairman and city/county administrators. For a list of jurisdictions, agencies and titles of those that were notified during each PSPS event, please see section 7 in PG&E's de-energization event reports.

Below is a chart that notes when public safety partner notifications began, when customer de-energizations began, the number of hours public safety partners were notified ahead of de-energization and the PDF page number within the de-energization reports that list the jurisdictions, agencies and titles of the contacts notified.

⁵ For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the number of distinctive entities would be reported as one. This is because the priority notification entity counts as a single entity.

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Date/Time Agency Public Safety Partner Notifications Began	10/6/2019 at 20:22	10/20/2019 at 12:03	10/24/2019 at 12:00
Date/Time First Customer De-Energization Began	10/9/2019 at 00:09	10/23/2019 at 14:14	10/26/2019 at 08:26
# Hours Agencies Were Notified Ahead of De-Energization	52	74	44*
PDF Page # in De-Energization Report that Lists Jurisdictions, Agencies and Title of Contacts Notified	Appendix F 162-217	Appendix D 89-113	Appendix E 217-275

*Note: Due to changes in the weather forecast and to minimize confusion related to the Oct 23 PSPS event, PG&E held off formally notifying agencies regarding the Oct 26 PSPS event until Oct 24. Some agencies were informally notified of another event during Operational Briefings and through their PG&E contact.

The following table provides the counts of the Service Point IDs of public safety partners/priority notice entities with service points impacted during an event, such as police, fire, telecom providers, water agencies, emergency hospitals that did not receive 48-78 hour *automated* advanced notifications via PG&E's customer notification system. As described in event reports, many of these entities also received personal emails, phone calls from their account representatives (such as for water agencies and hospitals), and/or by staff in the EOC, including the Critical Infrastructure Lead (CIL) who coordinates with Communications providers, and/or by operators from PG&E's Grid Control Center (GCC) who coordinates with transmission level customers. Additionally, some of these entities may have received automated notifications via PG&E's agency notifications as described above.

Note that PG&E's lists of public safety partners and priority notification entities are continually updated in PG&E's system of record, and PG&E does not maintain historical records of public safety partners and priority notification entities at a specific point in time. As a result, the numbers of public safety partners and priority notification entities in the table below were based on designations from early 2020, which may slightly differ from the designations that existed at the time of the October 2019 PSPS events.

Table 1. Public Safety Partners/Priority Notification Entities (in terms of the number of SPID)

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of SPID of public safety partners/priority notification entities who did not receive 48- to up to 72-hour advanced notification	2,357	780	2,032
Among the number of SPID of public safety partners/priority notification entities who did not receive 48 to up to 72-hour advanced notification, number of SPID of public safety partners who did not receive 1- to up to 48-hour advanced notification as well	62	6	121

Table 2: All Affected Customers/Populations Other Than Public Safety Partners/Priority Notification Entities

PG&E is providing these numbers by Service Point ID (SPID).

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of SPID of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to up to 48-hour advanced notification	162,496	10,353	227,803
Among the number of SPID of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to up to 48-hour advanced notification, number of SPID of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to up to 24-hour advanced notification as well	24,100	2,063	52,040

Table 3: All Affected Customers/Populations (in terms of the number of SPID)

PG&E objects to Table 3, rows 3 and 4, of this data request on the grounds that the numbers of customers “who did not receive notification before their power was turned back on” and “who did not receive notification when re-energization was completed” are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

PG&E is providing these numbers by Service Point ID (SPID).

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of SPID of ALL impacted customers who did not receive any advance notification before a de-energization event was initiated	23,434	2,069	37,329

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 021-Q02		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 021-Q02Rev01		
Request Date:	July 6, 2020	Requester DR No.:	021
Date Sent:	July 24, 2020 Revised September 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: STATISTICS OF PG&E'S OCTOBER 2019 DE-ENERGIZATION EVENTS

QUESTION 02

The De-Energization Guidelines set forth in Appendix A to Decision 19-05-042 state that:

The electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline:

- 48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities
- 24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations
- 1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations
- When de-energization is initiated: notification of all affected customers/populations
- Immediately before re-energization begins: and notification of all affected customers/populations
- When re-energization is complete: notification of all affected customers/populations¹

In light of the De-Energization Guidelines above, please fill in the three tables (Tables 1 to 3) below with the appropriate number of public safety partners/priority notification entities, all other affected customers/populations, and all affected customers/populations notified as indicated for PG&E's October 2019 de-energization events.

¹ Decision 19-05-042, pp. A8 to A9.

TABLE 1
PUBLIC SAFETY PARTNERS/PRIORITY NOTIFICATION ENTITIES
(IN TERMS OF THE NUMBER OF ADDRESS_ID²)³

Line No.	Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
1	Number of Address_ID of public safety partners/priority notification entities who did not receive 48- to 72-hour advanced notification			
2	Among the number of Address_ID of public safety partners/priority notification entities who did not receive 48 to 72-hour advanced notification, number of Address_ID of public safety partners who did not receive 1- to 48-hour advanced notification as well			

TABLE 2
ALL AFFECTED CUSTOMERS/POPULATIONS OTHER THAN
PUBLIC SAFETY PARTNERS/PRIORITY NOTIFICATION ENTITIES
(IN TERMS OF THE NUMBER OF ADDRESS_ID)⁴

Line No.	Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
1	Number of Address_ID of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification			
2	Among the number of Address_ID of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification, number of Address_ID of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to 24-hour advanced notification as well			

-
- 2** An Address_ID provides a way for PG&E to identify distinctive addresses of PG&E's customers. For example, a customer, under a single customer account (represented by a unique Customer_ID) can have multiple unique Address_ID's to distinguish the various physical locations of the customer's facilities.
- 3** For example, if CalFire has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the number of distinctive facilities would be reported as six.
- 4** For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the number of distinctive entities would be reported as one. This is because the priority notification entity counts as a single entity.

TABLE 3
ALL AFFECTED CUSTOMERS/POPULATIONS
(IN TERMS OF THE NUMBER OF ADDRESS_ID)⁵

Line No.	Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
1	Number of Address_ID of ALL impacted customers who did not receive any advance notification before a de-energization event was initiated			
2	Number of Address_ID of ALL impacted customers who did not			
3	receive notification immediately before their power was turned back on			
4	Number of Address_ID of ALL impacted customers who did not receive notification when re-energization was completed			

ANSWER 02 REVISED 01

PG&E is amending its previous response to Question 2 to update the numbers to align with the list of Critical Facilities/Public Safety Partners as of May 2020. In its prior response to this request, PG&E had used an earlier-dated list of Critical Facilities/Public Safety Partners, which was not identical to the May 2020 list used to respond to other data requests. The purpose of this amendment is to ensure consistency across the data responses by using a single list of Critical Facilities/Public Safety Partners from May 2020.

The number of customers and Public Safety Partners notified during each time range in the minimum notification timeline depends on the known scope of the event at that point in time. The scope of the event may change in the time leading up to the event due to changes in the weather forecast and footprint, among other reasons. As the event approaches, the event scope becomes more certain and PG&E may identify and notify additional customers that were not previously identified as within the event scope during earlier timeframes. This context applies to the delivery of advance notifications according to the minimum notification timeline; please see Chapter 3 of PG&E's Opening Testimony for the reasons why some customers may have received no direct notification prior to de-energization.

Table 1: Public Safety Partners/Priority Notification Entities (in terms of the number of SPID)

⁵ For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the number of distinctive entities would be reported as one. This is because the priority notification entity counts as a single entity.

Description ^{Error! Reference source not found.}	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of SPID of public safety partners/priority notification entities who did not receive 48- to 72-hour advanced notification	3,545	1,140	3128
Among the number of SPID of public safety partners/priority notification entities who did not receive 48 to 72-hour advanced notification , number of SPID of public safety partners who did not receive 1- to 48-hour advanced notification as well	103	17	161

Table 2: All Affected Customers/Populations Other Than Public Safety Partners/Priority Notification Entities

PG&E is providing these numbers by Service Point ID (SPID).

Description ⁶	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of SPID of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to up to 48-hour advanced notification	161,992	10,309	233032
Among the number of SPID of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to up to 48-hour advanced notification , number of SPID of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to up to 24-hour advanced notification as well	24,058	2,052	53575

⁶ These totals include customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_022-Q01		
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Request Date:	July 8, 2020	Requester DR No.:	022
Date Sent:	July 22, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: PRIORITY NOTIFICATION OF CRITICAL FACILITIES

QUESTION 01

Please provide PG&E's procedure for identifying and notifying critical facilities of impending de-energization **at the time of the October 2019 de-energization events.**

ANSWER 01

In October 2019, PG&E identified critical facilities within the PSPS event scope by using its PSPS Viewer to identify impacted customers, including those designated as critical facilities. After those facilities were identified, PG&E provided initial agency notifications to critical facilities that were also public safety partners through automated phone calls, text messages, and emails. After the initial agency notifications were completed, PG&E notified additional critical facilities about PSPS events according to the general notification process for distribution customers, as described in PG&E's Opening Testimony, pp. 3-9 through 3-10 and 3-17 through 3-19. PG&E also prioritized critical facilities in that notification process: as described in Section 4.1 "Notifications" in PG&E's September 4, 2019 PSPS progress report, the first wave of customer notifications for PSPS events was sent to public safety partners, critical facilities, and Medical Baseline customers.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 022-Q02		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 022-Q02		
Request Date:	July 8, 2020	Requester DR No.:	022
Date Sent:	July 22, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: PRIORITY NOTIFICATION OF CRITICAL FACILITIES

QUESTION 02

At the time of the October 2019 de-energization events:

- a. What definition for “priority notification entities” did PG&E use at the time of the October 2019 de-energization events, including and incremental to the minimum definition set in D.19-05-042?^{3,4} Please explain PG&E’s reasoning for this definition.
- b. Were critical facilities within PG&E’s definition of priority notification entities at the time of the October 2019 de-energization events? If only some of the critical facilities met PG&E’s definition, please specify which facilities.

ANSWER 02

- a. In 2019, PG&E included as “priority notification entities” all of the entities that require priority notification in D.19-05-042, as well as hospital services, as PG&E interpreted those to be included in emergency response services.
- b. As stated in the response to Question 2.a., PG&E included some critical facilities as priority notification entities.

³ D.19-05-042, p. 85: “The Commission’s adopted definition of public safety partners does not include critical facilities and infrastructure beyond water utilities and communication providers. The utility may, in partnership with first/emergency responders and/or local government entities, identify other critical facilities that should receive priority notice. This guideline is intended to set a floor, not a ceiling for priority notification.”

⁴ D.19-05-042, p. 85: “Consistent with the principles of the SEMS, whenever possible, priority notification should occur to the following entities, at a minimum: Public safety partners, as defined herein, and adjacent local jurisdictions that may lose power as a result of de-energization. Notice to all other affected populations, including AFN populations, may occur after the utility has given priority notice; however, AFN populations may require additional notification streams. This guideline is not meant to be restrictive; utilities may provide priority notification to a broader subset of customers, e.g. certain critical facilities, to promote public safety.”

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_022-Q03		
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Request Date:	July 8, 2020	Requester DR No.:	022
Date Sent:	July 22, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: PRIORITY NOTIFICATION OF CRITICAL FACILITIES

QUESTION 03

Since the October 2019 de-energization events:

- a. Has PG&E **changed or modified** its adopted definition for “priority notification entities”, including and incremental to the minimum definition set in D.19-05-042?⁵ If yes, please explain PG&E’s reasoning for this **modification** of definition.
- b. If the answer to part (a) of this question is yes, are the critical facilities within PG&E’s current, **modified** definition of priority notification entities the same group of critical facilities within PG&E’s **prior** definition of priority notification entities?

ANSWER 03

- a. PG&E has modified its plans for priority notification entities to align with the definition established in the Adopted Phase 2 Guidelines in Addition to Appendix A of Decision 19-05-042 and Resolution ESRB-8.
- b. No, the critical facilities within the current list of priority notification entities have been modified to align with the definition established in the Adopted Phase 2 Guidelines in Addition to Appendix A of Decision 19-05-042 and Resolution ESRB-8. PG&E will continue to prioritize other critical facilities in the customer notification process, as described in the response to Question 1.

⁵ See, Footnotes 3 and 4.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 022-Q04		
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Request Date:	July 8, 2020	Requester DR No.:	022
Date Sent:	July 22, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: PRIORITY NOTIFICATION OF CRITICAL FACILITIES

QUESTION 04

Did PG&E's critical facility notification procedure **at the time of the October 2019 de-energization events** prioritize de-energization notifications to critical facilities over other customer types?

- a. If so, what was PG&E's methodology for prioritizing and then notifying impacted critical facilities over other customer types **for the October 2019 de-energization events**?
- b. If so, please cite to the relevant Commission decision, rule, or PG&E internal standard **effective at the time of the October 2019 de-energization events**.

ANSWER 04

- a. As described in the response to Question 1, PG&E prioritizes notifications to critical facilities over most other customer types. Critical facilities were included in PG&E's initial agency notifications and/or in the first wave of customer notifications for a PSPS event, depending on the type of critical facility.
- b. The guidelines adopted by and appended to D.19-05-042 state that priority notification should be given to "public safety partners . . . and adjacent local jurisdictions that may lose power as a result of de-energization" and priority notification may be given to "certain critical facilities, to promote public safety." D.19-05-042, p. A7.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_022-Q05		
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Request Date:	July 8, 2020	Requester DR No.:	022
Date Sent:	July 22, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: PRIORITY NOTIFICATION OF CRITICAL FACILITIES

QUESTION 05

At the time of the October 2019 PSPS events, how did PG&E's procedure for identifying and notifying critical facilities of impending de-energization protect public health and safety from the impacts of de-energizing critical facilities? Please explain specifically.

ANSWER 05

In October 2019, PG&E provided direct notifications to customers within the scope of a PSPS event, including critical facilities. Direct notifications are one channel through which PG&E informs customers of impending de-energization so that customers can take appropriate steps to mitigate the impacts of de-energization. As stated above in response to Questions 1 and 4, PG&E prioritizes notifications to critical facilities.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates_022-Q06		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_022-Q06		
Request Date:	July 8, 2020	Requester DR No.:	022
Date Sent:	July 22, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

SUBJECT: PRIORITY NOTIFICATION OF CRITICAL FACILITIES

QUESTION 06

Since the October 2019 de-energization events:

- a. Describe any updates PG&E has made to the above **procedures** (as described in Questions 1, 4, and 5) since the October 2019 de-energization events.
- b. Has PG&E taken any corrective actions in relation to its critical facilities notification or priority notification procedures since the October 2019 PSPS events? If yes, please describe in detail.

ANSWER 06

- a. Please see the response to 6.b., below.
- b. PG&E has taken steps to further improve its processes for communicating with and notifying critical facilities about potential PSPS impacts. Please see the response to Cal Advocates-PGE-R1812005-OSC-11 Question 4, which describes planned improvements to direct customer notifications for the 2020 wildfire season.
 - PG&E is developing and validating its list of critical facilities for the 2020 wildfire season. This process involves both internal and external validation. In 2020, PG&E automated the approach for identifying the list of critical facilities, which uses Structured Query Language (SQL) to pull key fields related to the customer account and assign as critical accordingly. The automated review was supplemented and verified by local experts and account managers to confirm that sites are accurately characterized as critical. PG&E has also shared its list of critical facilities with local governments and tribes, and is currently updating the list based on their feedback.
 - PG&E has updated its communications procedures with critical facilities, such that relevant facilities, like Medical Baseline customers, will be asked to confirm receipt of notifications. If the facilities that were sent notifications do not confirm receipt, PG&E account representatives will attempt follow-up communications.

- PG&E has met with key critical facilities to gather their feedback on the 2019 PSPS events and recommendations going forward, including telecommunications providers, hospital associations, BART, transportation agencies, national retailers and large grocery providers, and others. PG&E is also conducting direct outreach with all critical facilities to confirm their contact information and provide backup power information, among other things
- PGE has requested Commission clarification about the requirements for sharing sensitive critical facility customer information with local governments and tribes, and without an enforceable non-disclosure agreement before, during and after PSPS events. In particular, PG&E requested clarification that IOUs shall share non-competitively sensitive critical facility customer information with and without an enforceable non-disclosure or other confidentiality agreement.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 023-Q01-04		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 023-Q01-04		
Request Date:	July 14, 2020	Requester DR No.:	023
Date Sent:	July 24, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

QUESTION 01-04

Duration and Frequency of the October 2019 De-Energization Events

For the three October 2019 de-energization events,¹

- a) Does the duration of a de-energization event equal (or less than) the sum of the duration of the weather event (e.g., duration of critical fire weather condition) and the time it takes to restore services, as expressed in the following equation?

Duration of PSPS event

$$\leq \text{Weather Event Duration} + \text{PG\&E's Restoration Time}$$

- i. If the duration of the de-energization events in October 2019 cannot be expressed as stated in the equation above, **please explain in full and complete detail** why the equation is not a proper representation of a PSPS event duration.
 - ii. Please state and explain what part of the duration of each of the October 2019 de-energization events was based **on the weather event and how long the weather event itself lasted.**
 - iii. Please state and explain what part of the duration of each of the October 2019 de-energization events was based **on the time it took PG&E to restore service and how long the restoration time lasted.**
- b) Please provide supporting documentation showing that, **prior to the three October 2019 de-energization events:**
- i. PG&E estimated how long **the weather event part of the outage** for each of those events (i.e., the time when there will be high wind with warm and dry weather which put powerlines at risk, etc.) would last; and
 - ii. PG&E estimated how long **the restoration time part of the outage** for each of those events (i.e., after the conditions that necessitated the de-energization event had passed, the time it would take PG&E's crew to inspect the field before re-energizing the lines, etc.) would last.

1 The three PG&E's de-energization events are the October 9 to 12, 2019 de-energization event, the October 23 to 25, 2019 de-energization event, and the October 26 to November 1, 2019 de-energization event

- iii. For the responses to parts i and ii of this question, what factors were these estimates specifically based on (e.g. the duration of shutting down the power depends on the weather conditions and the circuit conditions, etc.)? Please explain in detail.
- iv. What was the level of accuracy of the estimated duration of de-energization and re-energization part of the October 2019 PSPS events, **compared to the actual timescales that took place in October 2019**? Please elaborate.

ANSWER 01-04

PG&E objects to this data request on the grounds that the duration of PSPS events are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

QUESTION 01-04

For the three de-energization events in October 2019,

- a) What assessment, if any, has PG&E made of the extent to which those customers whom PG&E did not notify in advance of a de-energization event were informed of the duration of the upcoming de-energization events?
- b) What sources or avenues does PG&E maintain that those customers whom PG&E did not notify of the de-energization events would have received such information regarding the duration of the events?

ANSWER 01-04

PG&E objects to this data request on the grounds that notifications of, and information regarding, the duration of PSPS events are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Notification of De-Energization Events Provided by Local Government versus PG&E

QUESTION 01-04

Before the October 2019 PSPS events, what did PG&E do to minimize the need for local governments to directly notify PG&E's medically vulnerable residents regarding these events? Please provide supporting documentation.

ANSWER 01-04

PG&E's Opening Testimony, pp. 3-2 through 3-8, provide discussion of PG&E's efforts before the October 2019 events to minimize the need for local governments to directly notify PG&E's Medical Baseline customers regarding those events.

De-Energization Notification Procedure that Prioritized Critical Facilities

QUESTION 01-04

Prior to the October 2019 PSPS events,

- a) **What** was PG&E's notification and communication procedure for those events **which prioritized critical facilities (over its other customers)** due to the possible health and safety impacts associated with de-energization of these facilities?
- b) **How** did PG&E **prioritize** notifying and communicating these events to critical facilities over its other customers through its notification and communication procedure **at the time**?
- c) Has PG&E's notification and communication procedure **prioritizing** critical facilities (over its other customers) changed **since October 2019**?

ANSWER 01-04

PG&E objects to this data request on the grounds that the priority in which notifications were provided is not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 024-Q01		
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Request Date:	July 28, 2020	Requester DR No.:	024
Date Sent:	August 10, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Statistics of PG&E's October 2019 De-Energization Events (in terms of the Number of Customer Accounts)

QUESTION 01

The De-Energization Guidelines set forth in Appendix A to Decision 19-05-042 state that:

The electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline:

- 48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities.
- 24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations.
- 1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations.
- When de-energization is initiated: notification of all affected customers/populations.
- Immediately before re-energization begins: and notification of all affected customers/populations.
- When re-energization is complete: notification of all affected customers/populations¹.

In light of the De-Energization Guidelines above, please fill in the three tables (Tables 1 to 3) below with the appropriate number of public safety partners/priority notification entities, all other affected customers/populations, and all affected customers/populations notified as indicated for PG&E's October 2019 de-energization events, in terms of the number of **customer accounts**.

¹ D.19-05-042, pp. A8 to A9.

Table 1: Public Safety Partners/Priority Notification Entities (in terms of the number of customer accounts)

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of public safety partners/priority notification entities who did not receive 48- to 72-hour advanced notification			
Among the number of customer accounts of public safety partners/priority notification entities who did not receive 48 to 72- hour advanced notification, number of customer accounts of public safety partners who did not receive 1- to 48-hour advanced notification as well			

Table 2: All Affected Customers/Populations Other Than Public Safety Partners/Priority Notification Entities (in terms of the number of customer accounts)⁴

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification			
Among the number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification, number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to 24- hour advanced notification as well			

Table 3: All Affected Customers/Populations (in terms of the number of *customer accounts*)⁵

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of ALL impacted customers who did not receive any advance notification before a de-energization event was initiated			
Number of customer accounts of ALL impacted customers who did not receive notification immediately			
before their power was turned back on			
Number of customer accounts of ALL impacted customers who did not receive notification when re-energization was completed			

¹ As defined in the De-energization Rulemaking 18-12-005, Decision 19-05-042 Adopting De-energization Guidelines. Attachment C, page C2

² As defined in the De-energization Rulemaking 18-12-005, Decision 19-05-042 Adopting De-energization Guidelines. Attachment C, page C6

³ Decision 19-05-042, pp. A8 to A9.

⁴ For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the **number of distinctive entities** would be reported as one. This is because the priority notification entity counts as a single entity.

⁵ For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the **number of distinctive entities** would be reported as one. This is because the priority notification entity counts as a single entity.

ANSWER 01

Please refer to PG&E's response to Cal Advocates-PGE-R1812005-OSC-12 delivered on July 24, 2020 for more information specific to Public Safety Partner notification processes.

The following table provides the counts of the Account IDs of public safety partners/priority notice entities with service points impacted during an event, such as police, fire, telecom providers, water agencies, emergency hospitals that did not receive

48-78 hour automated advanced notifications via PG&E's customer notification system. As described in event reports, many of these entities also received personal emails, phone calls from their account representatives (such as for water agencies and hospitals), and/or by staff in the EOC, including the Critical Infrastructure Lead (CIL) who coordinates with Communications providers, and/or by operators from PG&E's Grid Control Center (GCC) who coordinates with transmission level customers. Additionally, some of these entities may have received automated notifications via PG&E's agency notifications as described above.

Note that PG&E's lists of public safety partners and priority notification entities are continually updated in PG&E's system of record, and PG&E does not maintain historical records of public safety partners and priority notification entities at a specific point in time. As a result, the numbers of public safety partners and priority notification entities in the table below were based on designations from early 2020, which may slightly differ from the designations that existed at the time of the October 2019 PSPS events.

Table 1: Public Safety Partners/Priority Notification Entities (in terms of the number of customer accounts)²

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of public safety partners/priority notification entities who did not receive 48- to up to 72-hour advanced notification	1,445	466	1,220
Among the number of customer accounts of public safety partners/priority notification entities who did not receive 48 to up to 72-hour advanced notification, number of customer accounts of public safety partners who did not receive 1- to up to 48-hour advanced notification as well	49	6	98

Table 2: All Affected Customers/Populations Other Than Public Safety Partners/Priority Notification Entities (in terms of the number of customer accounts)²

-
- ² PG&E sends out notifications based on Service Point ID (SPID). Account IDs may have more than one unique SPID linked to the Account ID. Due to that, an Account ID may fall into more than one notification timing category in the tables below if the unique SPIDs under the Account ID fall into separate notification timing categories. In this case, PG&E has counted the Account ID once in each timing category.

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to up to 48-hour advanced notification	151,132	9,554	212,764
Among the number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to up to 48-hour advanced notification, number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to up to 24- hour advanced notification as well	23,431	1,989	49,895

Table 3: All Affected Customers/Populations (in terms of the number of *customer accounts*)²

PG&E objects to Table 3, rows 2 and 3, of this data request on the grounds that the numbers of customers “who did not receive notification before their power was turned back on” and “who did not receive notification when re-energization was completed” are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of ALL impacted customers who did not receive any advance notification before a de-energization event was initiated	22,773	1,994	35,486

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 024-Q01Rev01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 024-Q01Rev01		
Request Date:	July 28, 2020	Requester DR No.:	024
Date Sent:	August 10, 2020 Revised September 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Lucy Morgans

Statistics of PG&E's October 2019 De-Energization Events (in terms of the Number of Customer Accounts)

QUESTION 01

The De-Energization Guidelines set forth in Appendix A to Decision 19-05-042 state that:

The electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline:

- 48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities.
- 24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations.
- 1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations.
- When de-energization is initiated: notification of all affected customers/populations.
- Immediately before re-energization begins: and notification of all affected customers/populations.
- When re-energization is complete: notification of all affected customers/populations¹.

In light of the De-Energization Guidelines above, please fill in the three tables (Tables 1 to 3) below with the appropriate number of public safety partners/priority notification entities, all other affected customers/populations, and all affected customers/populations notified as indicated for PG&E's October 2019 de-energization events, in terms of the number of **customer accounts**.

¹ D.19-05-042, pp. A8 to A9.

Table 1: Public Safety Partners/Priority Notification Entities (in terms of the number of customer accounts)

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of public safety partners/priority notification entities who did not receive 48- to 72-hour advanced notification			
Among the number of customer accounts of public safety partners/priority notification entities who did not receive 48 to 72- hour advanced notification, number of customer accounts of public safety partners who did not receive 1- to 48- hour advanced notification as well			

Table 2: All Affected Customers/Populations Other Than Public Safety Partners/Priority Notification Entities (in terms of the number of customer accounts)⁴

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification			
Among the number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification, number of customer accounts of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to 24- hour advanced notification as well			

Table 3: All Affected Customers/Populations (in terms of the number of *customer accounts*)⁵

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of customer accounts of ALL impacted customers who did not receive any advance notification before a de-energization event was initiated			
Number of customer accounts of ALL impacted customers who did not receive notification immediately			
before their power was turned back on			
Number of customer accounts of ALL impacted customers who did not receive notification when re-energization was completed			

¹ As defined in the De-energization Rulemaking 18-12-005, Decision 19-05-042 Adopting De-energization Guidelines. Attachment C, page C2

² As defined in the De-energization Rulemaking 18-12-005, Decision 19-05-042 Adopting De-energization Guidelines. Attachment C, page C6

³ Decision 19-05-042, pp. A8 to A9.

⁴ For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the **number of distinctive entities** would be reported as one. This is because the priority notification entity counts as a single entity.

⁵ For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the **number of distinctive entities** would be reported as one. This is because the priority notification entity counts as a single entity.

ANSWER 01 REVISED 01

PG&E is amending its previous response to Question 1 to update the numbers to align with the list of Critical Facilities/Public Safety Partners as of May 2020. In its prior response to this request, PG&E had used an earlier-dated list of Critical Facilities/Public Safety Partners, which was not identical to the May 2020 list used to respond to other data requests. The purpose of this amendment is to ensure consistency across the data responses by using a single list of Critical Facilities/Public Safety Partners from May 2020.

The number of customers and Public Safety Partners notified during each time range in the minimum notification timeline depends on the known scope of the event at that point in time. The scope of the event may change in the time leading up to the event due to changes in the weather forecast and footprint, among other reasons. As the event approaches, the event scope becomes more certain and PG&E may identify and notify additional customers that were not previously identified as within the event scope during earlier timeframes. This context applies to the delivery of advance notifications according to the minimum notification timeline; please see Chapter 3 of PG&E's Opening Testimony for the reasons why some customers may have received no direct notification prior to de-energization.

Table 1: Public Safety Partners/Priority Notification Entities (in terms of the number of *customer accounts*)²

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of <i>customer accounts</i> of public safety partners/priority notification entities who did not receive 48- to up to 72-hour advanced notification	2,120	723	1,900
Among the number of <i>customer accounts</i> of public safety partners/priority notification entities who did not receive 48 to up to 72-hour advanced notification, number of <i>customer accounts</i> of public safety partners who did not receive 1- to up to 48-hour advanced notification as well	75	13	131

² PG&E sends out notifications based on Service Point ID (SPID). Account IDs may have more than one unique SPID linked to the Account ID. Due to that, an Account ID may fall into more than one notification timing category in the tables below if the unique SPIDs under the Account ID fall into separate notification timing categories. In this case, PG&E has counted the Account ID once in each timing category. These totals include customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes.

Table 2: All Affected Customers/Populations Other Than Public Safety Partners/Priority Notification Entities (in terms of the number of *customer accounts*)²

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of <i>customer accounts</i> of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to up to 48-hour advanced notification	150,834	9,527	217,623
Among the number of <i>customer accounts</i> of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to up to 48-hour advanced notification, number of <i>customer accounts</i> of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to up to 24- hour advanced notification as well	23,404	1,982	51,307

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 025-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 025-Q01		
Request Date:	July 28, 2020	Requester DR No.:	025
Date Sent:	August 5, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 01

During the three PG&E's October 2019 de-energization events,¹ PG&E did not provide advance notification to all customers; in PG&E's own assessment, was this failure to notify all customers adequate in a PSPS event?

ANSWER 01

PG&E objects to this request as vague with respect to the term "adequate." As described in PG&E's Opening Testimony and noted in [DRU 2665.02(b)], PG&E strove to directly notify each customer within the scope of a PSPS outage, using a variety of channels, before that customer was de-energized. As stated in PG&E's Rebuttal Testimony, p. 3-2, PG&E directly notified over 97% of customers impacted by the October 2019 PSPS events, and fewer than 3% of customers were not directly notified in advance. The reasons that PG&E was not able to notify such customers were explained in PG&E's Opening and Rebuttal Testimony. It is up to the Commission to determine whether they believe PG&E's efforts were adequate.

¹ The three PG&E's de-energization events took place from October 9 to 12, from October 23 to 25, and from October to November 1, 2019.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 025-Q02		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 025-Q02		
Request Date:	July 28, 2020	Requester DR No.:	025
Date Sent:	August 5, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 02

In relation to the three PG&E's October 2019 de-energization events, in PG&E's view:

- a) What percentage of PG&E public safety partners/priority notification entities customers receiving over 48- to 72-hour advance notification would be considered adequate or reasonable?
- b) What percentage of PG&E all customers (other than public safety partners/priority notification entities) receiving 24- to 48-hour advance notification would be considered adequate or reasonable?
- c) What percentage of PG&E public safety partners/priority notification entities customers receiving 1- to 48-hour advance notification would be considered adequate or reasonable?
- d) What percentage of PG&E all customers (other than public safety partners/priority notification entities) receiving 1- to 24-hour advance notification would be considered adequate or reasonable?

ANSWER 02

See response to *CalAdvocates_025-Q01*.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 025-Q03		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 025-Q03		
Request Date:	July 28, 2020	Requester DR No.:	025
Date Sent:	August 5, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 03

During the October 9 to 12, 2019 de-energization event, PG&E's secure data transfer portal was inaccessible via PG&E's website.

- a) In PG&E's own assessment of this event, was the inaccessibility of PG&E's website, and therefore secure data transfer portal, reasonable or adequate in a PSPS event?
- b) Please explain in full and complete detail what the impact, implication or consequences of the inaccessibility of PG&E's secure data transfer portal via PG&E's website was for PG&E's customers?
- c) Has PG&E received any information, complaints or other data from PG&E's customers regarding the impact, implications or consequences of the inaccessibility of PG&E's secure data transfer portal via PG&E's website?
 - i) If so, please state the source(s) of such information, complaint or data and describe in full and complete detail what said source state or provide.

ANSWER 03

- a) PG&E objects to this request as vague with respect to the terms "reasonable or adequate."

With respect to the inaccessibility of PG&E's website, PG&E has accepted full responsibility for the failures associated with the website. The reasons that PG&E's website became inaccessible were explained in PG&E's Opening and Rebuttal Testimony. It is up to the Commission to determine whether they believe PG&E's efforts were reasonable or adequate.

With respect to the purported inaccessibility of PG&E's secure data transfer portal, PG&E disagrees with the question's assumption that the data transfer portal was inaccessible. PG&E's Opening Testimony, p. 4-17 through 4-18, states that there was no evidence of an outage to the ESFT Portal that rendered it generally inaccessible, and that even during the PGE.com outage users were still able to reach the ESFT Portal by going to the ESFT Portal log-in screen. PG&E's Opening Testimony further states that when the PGE.com website began having issues on October 8, PG&E's Liaison team—which is responsible for interfacing with the Company's county partners who use the ESFT Portal—

reached out to portal users and specifically directed them to the ESFT address. As the Joint Local Governments' Direct Testimony, p. 8, acknowledges, the ESFT Portal "was generally accessible during the October 9 PSPS event."

- b) See response to No. 3(a).
- c) PG&E's customer complaint database does not contain any complaints from customers related to inaccessibility of the secure data transfer portal during the October 9-12 de-energization event. As noted in PG&E's Opening Testimony, p. 4-17 through 4-18, there was no evidence of an outage to the Electronic Secure File Transfer (ESFT) Portal that rendered it generally inaccessible. Even during the PGE.com outage, users were still able to reach the ESFT Portal by going to the ESFT Portal log-in screen. In 2019, this portal was only made available to governmental agencies and not individual PG&E customers

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 025-Q04		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 025-Q04		
Request Date:	July 28, 2020	Requester DR No.:	025
Date Sent:	August 5, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 04

During the October 9 to 12, 2019 de-energization event, PG&E's website was unavailable during a substantial part of the de-energization event;¹ in PG&E's own assessment of this even, was the unavailability of PG&E's website during a substantial portion of the de- energization event reasonable in a PSPS event?

ANSWER 04

PG&E has acknowledged (see, e.g., Transcript of Oct. 18, 2019 CPUC Emergency PSPS Meeting at p. 12, PG&E's Rebuttal Testimony, 4-1 through 4-3 and 4-9), PG&E believes the unavailability of the website was not acceptable, and PG&E has undertaken substantial efforts to address that issue going forward (see PG&E Opening Testimony, p. 4-11 through 4-15).

¹ *Assigned Commissioner and Assigned ALJ's Ruling Setting the Scope and Schedule of the OSC against PG&E for Violations Related to the Implementation of the PSPS in October 2019*, December 23, 2019, pp. 3 to 4.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 025-Q05		
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Request Date:	July 28, 2020	Requester DR No.:	025
Date Sent:	August 5, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 05

When the October 9 to 12, 2019 de-energization event ended, PG&E might not have predicted that it would de-energize again from October 23 to 25, 2019. However, PG&E could reasonably predict that it might need to de-energize its system again in Fall 2019. In response to the communication and notification failures in the October 9 to 12, 2019 de-energization event, PG&E might have taken some corrective actions before another de-energization event would soon occur.

The following questions are related to the three October 2019 de-energization events below:¹

- October 9 to 12, 2019 de-energization event,
- October 23 to 25, 2019 de-energization event, and
- October 26 to November 1, 2019 de-energization event.

October 9 to 12, 2019 De-Energization Event

- a) Once the October 9 to 12, 2019 de-energization event terminated, what immediate steps did PG&E take to prevent any communication and notification failures in future de-energization events during the rest of 2019? Of the steps that PG&E took to prevent future communication and notification failures, please identify and specify the steps that PG&E completed before the next de-energization event.
- b) Please state when PG&E completed the steps identified in part (a) of this question, subsequent to October 9 to 12, 2019, to prevent those communication and notification failures associated with the October 9 to 12 de-energization event, and provide supporting evidencing that these steps were actually taken.

October 23 to 25, 2019 De-Energization Event

- c) Once the October 23 to 25, 2019 de-energization event terminated, what immediate steps did PG&E take to prevent any communication and notification failures in future de-energization events during the rest of 2019? Of the steps that PG&E took

¹ The three PG&E's de-energization events are the October 9 to 12, 2019 de-energization event, the October 23 to 25, 2019 de-energization event, and the October 26 to November 1, 2019 de-energization event.

to prevent future communication and notification failures, please identify and specify the steps that PG&E completed before the next de-energization event.

- d) Please state when PG&E completed the steps identified in part (c) of this question, subsequent to October 23 to 25, 2019, to prevent those communication and notification failures associated with the October 23 to 25 de-energization event, and provide supporting evidencing that these steps were actually taken.

October 26 to November 1, 2019 De-Energization Event

- e) Once the October 26 to November 1, 2019 de-energization event terminated, what immediate steps did PG&E take to prevent any communication and notification failures in future de-energization events during the rest of 2019? Of the steps that PG&E took to prevent future communication and notification failures, please identify and specify the steps that PG&E completed before the next de-energization event.
- f) Please state when PG&E completed the steps identified in part (e) of this question, subsequent to October 26 to November 1, 2019, to prevent those communication and notification failures associated with the October 26 to November 1 de-energization event, and provide supporting evidencing that these steps were actually taken.

ANSWER 05

- a) See PG&E's Opening Testimony, p. 4-11 through 4-15, for a discussion of PG&E's improvements to website communications.

In addition, on Wednesday, October 16, PG&E leadership held two 90-minute conference calls with impacted counties and received input about how the Company could better coordinate and communicate with local governments. Based on feedback received during these calls, PG&E implemented certain process improvements prior to the October 23-25 and October 26-November 1 PSPS events. PG&E's Biweekly Report of PG&E in Compliance with January 30, 2020 Assigned Commissioner's Ruling (Feb. 10, 2020) discusses these improvements at pages 13-14.

During the October 9-12 PSPS event, PG&E moved from twice-daily to thrice-daily operational briefings with local agencies and tribes, and began using a more robust conference line with a live operator. This new tool expanded the number of participants that were able to join, ensured participants were able to clearly hear the PG&E situational awareness update, and provided a systematic approach for the question and answer portion of the call.

In addition, following the October 9-12 event, and beginning with the October 23-25 PSPS event, PG&E also began sharing with counties and tribes lists of Medical Baseline customers within their jurisdictions who had not confirmed receipt of their notifications.

In connection with the October 26-November 1 event, dedicated PG&E liaisons (single points of contact) coordinated with potentially impacted counties and tribes to

review the proposed scope of the event and provided the critical facilities lists through the secure data transfer portal.

- b) See response to No. 5(a).
- c) See response to No. 5(a).
- d) See response to No. 5(a).
- e) See response to No. 5(a).
- f) See response to No. 5(a).

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q01		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 01

Explanation for PG&E's failure to notify 3,900 Customers:

- a) **How and why did PG&E exclude** these 3,900 customers from its count of the advance notifications PG&E missed during the October 26 to November 1, 2019 de-energization event?
- b) Please explain why the number of customers PG&E failed to notify was as high as 3,900 including but not limited to whether the customers were grouped in categories of large numbers for purposes of notification or whether they were individually notified, or whether a department assigned said notification made an error, etc.
- c) Please **explain or characterize the basis** for PG&E failing to notify this many customers; for example, did the failure involve PG&E's data, data structure, database, analytic error, database queries and/or other issues?
- d) To aid in understanding how PG&E failed to notify 3,900 customer of a PSPS event, please explain **in detail** the **root causes of the failure, including any internal investigations, reports or assessments that PG&E has done to understand the failure, if any**. Please include whether PG&E attributes this failure to automation? If applicable, please explain with the use of database queries and the explanation of PG&E's data structure for its de-energization notification database.

ANSWER 01

- a. PG&E interprets this question to be asking why it did not previously report these approximately 3,900 missed customer notifications. PG&E was not previously aware of these missed customer notifications.

For its post-event reporting in 2019, PG&E compared two sets of data to identify missed customer notifications.

- The first data set was from PG&E's notification vendor, Message Broadcast, which identified the customers who were sent a notification indicating that they would be de-energized imminently (the "prior notification list").
- The second data set was from PG&E's outage system, which identified

customers who were actually de-energized during that event (the “de-energized customer list”).

When PG&E performed its initial analysis of missed notifications after the 2019 events, it compared these two data sets. If a customer was included on both lists (i.e., the prior notification list and the de-energized customer list), then the customer was identified as having been notified.

The primary reason PG&E did not identify the 3,900 late notifications was because the October 26–November 1 event involved two overlapping outages: the first beginning on October 26, and the second beginning on October 29. Because, as discussed above, PG&E’s methodology for assessing customer notifications was to compare the two data sets, PG&E was not aware that certain customers were included in the October 26 de-energization event and did not receive prior notification, but they did receive prior notification of the October 29 event.

Since the 2019 PSPS events, Further, the limitations of the computing resources available to PG&E at the time, and the volume of data and analysis required for an event of this size and complexity, made it impracticable for PG&E to develop and implement new methodologies that could have identified the approximately 3,900 customers within the timeframe to submit its ESRB-8 report—particularly given that PG&E was also simultaneously reviewing the outage data from the prior October events. PG&E has updated its tools and processes to quickly and accurately perform data analysis involving large and complex data sets. Among other things, PG&E is working with Palantir Technologies to build a comprehensive data archive, which can handle many complex data sets to perform its post-event data analysis quickly and accurately. In developing the improved data analysis and capabilities, PG&E has built in rules to highlight missed and late customer notifications. These updated tools and processes enabled PG&E to identify the approximately 3,900 missed customer notifications, which were disclosed in its July 2020 amended ESRB-8 report.

- b) PG&E interprets this question to be asking why the approximately 3,900 customers were not notified before being de-energized. Several substations were identified for de-energization in the late stages of the October 26-November 1 PSPS planning, leaving inadequate time for PG&E to provide prior customer notification.

Substations were identified in the late stages of the October 26-November 1 PSPS planning due to reduced power generation and transmission capabilities from the ongoing Kincade Fire, along with non-standard transmission circuit configurations caused by the PSPS event.

- c) Please see the responses to 1.a. and 1.b.
- d) Please see the responses to 1.a. and 1.b.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q02		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q02		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 02

Please explain in full and complete detail why this failure to notify 3,900 customers only occurred during the October 26 to November 1, 2019 de-energization event, but not the other two de-energization events in October 2019?

ANSWER 02

PG&E interprets this question to ask why PG&E identified approximately 3,900 additional missed customer notifications for the October 26–November 1 event, and no additional missed notifications for the October 9–12 and October 23–25 events. The process PG&E used to determine whether a customer was notified of a PSPS event is described in response to Question 1.a. This process worked well for identifying missed notifications for the October 9–12 and October 23–25 events. But as stated in response to Question 1.a., the October 26–November 1 event was unique due to the size and nature of the event. PG&E has conducted further analysis and determined that this late notification issue is limited to the October 26–November 1 event, and that there were no additional late notifications for the other October PSPS events.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q03		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q03		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 03

What is **the traceable date when PG&E first committed such misidentification or erroneous exclusion of these 3,900 customers?** Please distinguish the date the failure to notify 3,900 customers occurred from the date PG&E discovered the failure.

ANSWER 03

PG&E objects to this data request as vague and ambiguous, because it is unclear what is meant by “first committed” and “distinguish the date the failure to notify 3,900 customers occurred from the date PG&E discovered the failure.” Without waiving this objection, PG&E responds as follows.

PG&E first reported its missed notification counts for the October 26-November 1 event in its November 18, 2019 post-event ESRB-8 report. Consistent with standard practices, the information provided in those initial, 10-day reports was updated after the fire season had concluded and further analysis could be completed, on January 27, 2020.

As discussed in response to Question 4, PG&E identified the approximately 3,900 missed customer notifications in early June 2020 and updated its ESRB-8 report in July 2020.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q04		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q04		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Discovery of PG&E's Failure to Notify 3,900 Customers

QUESTION 04

When did PG&E first discover that it had failed to include the 3,900 customers when counting the number of customers who missed advance notification for the October 26 to November 1, 2019 de-energization event?

ANSWER 04

PG&E objects to this data request as vague and ambiguous, because the discovery that PG&E “had failed to include the 3,900 customers” was an iterative process. Without waiving this objection, PG&E responds as follows.

PG&E first became aware of the possibility of certain missed customer notifications in connection with the October 26–November 1 PSPS in early June 2020 when it was performing analysis to respond to a data request. The investigative work to understand and confirm the scope of the issue and number of additional missed notifications, verify the accuracy of the analysis, and understand the causes for the missed notifications extended into July 2020.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 026-Q05		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q05		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Discovery of PG&E's Failure to Notify 3,900 Customers

QUESTION 05

Why did PG&E only report this failure to notify 3,900 customers in July 2020?

ANSWER 05

Please see the response to Question 4.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q06		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q06		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Discovery of PG&E's Failure to Notify 3,900 Customers

QUESTION 06

After the October 26 to November 1, 2019 de-energization event, PG&E first filed the original Post-Event Report on November 18, 2019, which was then amended on January 27, 2020 and again on July 24, 2020. Please provide the reference language in the De-Energization Guidelines that provides the basis for PG&E to amend or update prior reports already submitted and before the Commission, rather submit a request for a ruling or decision by the Commission authorizing such an amendment or update.

Medical Baseline Customers included within the Failure to Notify 3,900 Customers

Table 1 below is based on the figures provided on page 2 of PG&E's Amended Post-Event Report:¹

¹ PG&E, *Amended Post-Event Report for October 26 to 29, 2019*, July 24, 2020, pp. 1 to 2. See, *Attachment PubAdv-PGE-OSC-17_Attch02.pdf* to this data request.

**Table 1: Amended Figures for Customer Notification
for the October 26 to November 1, 2020 De-Energization Event**

Number of Customer Accounts Applicable to the October 26 to November 1, 2019 De- Energization Event	Amendment Submitted on January 27, 2020 (a)	Amendment Submitted on July 24, 2020 (b)	Difference (b) - (a)
Total number of customer accounts who missed advance notifications and experienced outages of one hour or longer	22,000	25,900	3,900
Total number of customer accounts who are Medical Baseline (MBL) customer, missed advanced notifications, and experienced outages of one hour or longer	400	500	100
Total MBL customer accounts that PG&E attempted to notify	35,144	35,048	-96
Total MBL customer accounts with confirmed receipt of notification	33,739	33,656	-83

PG&E discovered that, of the 3,900 customers the company did not notify, there were 100 MBL customers.² This figure is highlighted in red above.

- a) Logically, these 100 MBL customers who were not notified would not be able to confirm receipt of advance notification either. Therefore, when the total number of MBL customers PG&E failed to notify increased by 100 (from 400 to 500), the corresponding number of MBL customers who confirmed receipt of notification should drop by 100.

Please explain why the figure for the “[t]otal MBL customer accounts with confirmed receipt of notification” only dropped by 83 instead of 100?³

- b) Logically, the number of customer accounts that PG&E attempted to notify in advance should always be greater than or equal to the number of customer accounts that were able to confirm receipt of advance notification.

-
- ² Please refer to the cell stating “100” along the third row (for “Total number of customer accounts who are Medical Baseline (MBL) customer, missed advanced notifications, and experienced outages of one hour or longer” and along the far-right column of Table 1.
- ³ Please refer to the cell stating “-96” along the last row (for “Total MBL customer accounts with confirmed receipt of notification” and along the far-right column of Table 1.

If an additional 100 MBL customer accounts (on top of 400 customer accounts) were actually not notified in advance,⁴ this means that PG&E actually had attempted to notify at least 100 fewer customers (compared to the previous count of attempted notification made) ahead of the de-energization event. That is, the latter figure would drop by at least 100.

So, when PG&E amended its figures on July 24, 2020, why did the figure for the “[t]otal MBL customer accounts that PG&E attempted to notify” drop by 96 customers instead of 100?⁵

ANSWER 06

PG&E objects to this data request on the grounds that “the basis for PG&E to amend or update prior reports” is not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving this objection, PG&E is not aware of any provision in the De-Energization Guidelines or the Commission Rules that prohibit utilities from amending or supplementing ESRB-8 reports. Further, as noted in PG&E’s January 27, 2020 update, in accordance with the De-Energization Guidelines, the ESRB-8 reports are submitted within 10 business days of the PSPS event and are based on data available when the reports are prepared. However, consistent with standard utility practice, PG&E continues to review the initial data included in the ESRB-8 reports on PSPS events to reconcile and validate the data. This reconciliation process is the process used in the annual reconciliation of outage data that PG&E undertakes each year in connection with submitting outage information to the CPUC in its Annual Electric Compliance Report. PG&E typically requires several months to review, reconcile, and validate outage data for the year in full.

PG&E further notes Cal PA has not previously objected to supplemented or amended ESRB-8 reports submitted to reflect the most accurate information available.

- a) As stated in the footnote 1 of the de-energization report, customer impact counts and details are subject to further adjustments and reconciliation. PG&E will adjust for material changes. In the post-event ESRB-8 report for the October 26–November 1 event, PG&E rounded the number of Medical Baseline customers who were not notified to the nearest 100. As a result, the July 2020 amended report shows an additional count of approximately 100 Medical Baseline customers who were not notified in advance of de-energization. This increase of 100 is a rounded figure; the actual change in the number of missed notifications to Medical Baseline customers is an increase of 96. These 96 Medical Baseline

⁴ Please refer to the cell stating “100” along the third row (for “Total number of customer accounts who are Medical Baseline (MBL) customer, missed advanced notifications, and experienced outages of one hour or longer” and along the far-right column of Table 4.

⁵ Please refer to the cell stating “-96” along the fourth row (for “Total MBL customers that PG&E attempted to notify” and along the far-right column of Table 4.

customers were among the approximately 3,900 customers notified after they were de-energized, and 83 confirmed receipt of the notification while 13 did not.

b) See response to 6a.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q07		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q07		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Customer Classification of Missed Advance Notifications

QUESTION 07

Please provide a breakdown by customer class of the 3,900 customers that PG&E failed to notify in advance. Please fill in Tables 2 to 4 below in terms of the number of customer accounts:

Table 2: The Breakdown of the 3,900 Customers, by Customer Class

Number of Customer Accounts by Customer Class	October 26 to November 1, 2019 De-Energization Event
Agricultural	
Commercial (Please do NOT consolidate this figure with the number of industrial customers)	
Industrial (Please do NOT consolidate this figure with the number of commercial customers)	
Residential	
California State Government	
Total Number of Customer Accounts	<The figures in the rows above should add up to 3,900 customer accounts>

Table 3: The Number of Medical Baseline Customers among the 3,900 Customers

Number of Customer Accounts among the 3,900 Customers, by Type	October 26 to November 1, 2019 De-Energization Event
Medical Baseline Customers (who are ALSO residential class)	

**Table 4: A Further Breakdown of the 3,900 Customers
(in terms of the number of customer accounts)**

Number of <i>Customer Accounts</i> among the 3,900 Customers, by Type	October 26 to November 1, 2019 De-Energization Event
Number of customer accounts who are Public safety partners (Please do NOT consolidate this figure with the number of priority notification entities)	
Among the public safety partners identified in the above row , the number of customer accounts which are ALSO critical facilities	
Number of customer accounts who are priority notification entities (Please do NOT consolidate this figure with the number of public safety partners)	
Among the priority notification entities identified in the above row , the number of customer accounts which are ALSO critical facilities	
The number of customer accounts who are critical facilities but are NEITHER public safety partners NOR priority notification entities	
Total Number of Customer Accounts who are Critical Facilities among the 3,900 customers	<The figures from the above rows in this table should add up to this figure.>

**Table 4: A Further Breakdown of the 3,900 Customers
(in terms of the number of Service Point ID)**

Number of <i>Service Point ID</i> among the 3,900 Customers, by Type	October 26 to November 1, 2019 De-Energization Event
Number of Service Point ID (SPID) who are Public safety partners (Please do NOT consolidate this figure with the number of priority notification entities)	
Among the public safety partners identified in the above row , the number of customer accounts which are ALSO critical facilities	
Number of SPID who are priority notification entities (Please do NOT consolidate this figure with the number of public safety partners)	
Among the priority notification entities identified in the above row , the number of SPID which are ALSO critical facilities	
The number of SPID who are critical facilities but are NEITHER public safety partners NOR priority notification entities	
Total Number of SPID who are Critical Facilities among the 3,900 customers	<The figures from the above rows in this table should add up to this figure.>
Number of Service Point ID (SPID) who are Public safety partners (Please do NOT consolidate this figure with the number of priority notification entities)	
Among the public safety partners identified in the above row , the number of customer accounts which are ALSO critical facilities	
Number of SPID who are priority notification entities (Please do NOT consolidate this figure with the number of public safety partners)	
Among the priority notification entities identified in the above row , the number of SPID which are ALSO critical facilities	

ANSWER 07

PG&E is providing responses to Questions 7 – 10 by Service Point ID (SPID). For more information on the relationship between SPID and Account IDs, please refer to PG&E's response to De-EnergizePowerLines_DR_CalAdvocates_024 Question 1 provided on August 7, 2020.

For Table 2, PG&E does not separate out data for Industrial and Commercial customers in the context of PSPS reporting. Per ESRB-8 requirements, PG&E reports out the number of affected customers, broken down by residential, medical baseline, commercial/industrial, and other.

For Table 4, the response is based on the list of critical facility designations provided in De-EnergizePowerLines_DR_CalAdvocates_016, Question 3, on May 14, 2020.

Regarding the mutually exclusive nature of Public Safety Partners, priority notification entities, and critical facilities that are neither Public Safety Partners nor priority notification entities in Table 4, PG&E has used definitions in Appendix A of D.19-05-042 for the response provided, as described below.

- Service Point IDs (SPIDs) who are Public Safety Partners are SPIDs meeting the definition per D.19-05-042 p.A4.
- All Service Point IDs (SPIDs) who are identified here as Public Safety Partners are also critical facilities.
- Priority notification entities are defined in D.19-05-042 p.A7 as follows:

“The Commission’s adopted definition of public safety partners does not include critical facilities and infrastructure beyond water utilities and communication providers. The utility may, in partnership with first/emergency responders and/or local government entities, identify other critical facilities that should receive priority notice. This guideline is intended to set a floor, not a ceiling for priority notification.”

At this time, PG&E has not identified “other critical facilities” not in partnership with first/emergency responders and/or local government. Therefore, have questions regarding priority notification entities are answered with “N/A”.¹

Additional notes regarding this data include:

- PG&E's lists of Public Safety Partners and Critical Facilities are refined in PG&E's system of record which is a live database that does not maintain historical records of Public Safety Partners and Critical Facilities at a specific point in time. As a result, the numbers of Public Safety Partners and Critical Facilities in the table below are based on designations in PG&E's customer database as of early 2020, which may slightly differ from the designations that existed at the time of the October 2019 PSPS events.

¹ For clarity, PG&E notes that its automated notification launch sequence typically notifies other non-Public Safety Partner critical facilities before general customers; however, PG&E does not formally identify these other non-Public Safety Partner critical facilities as priority notice entities. The notification launch sequence to the other non-Public Safety Partner critical facilities is a function of pre-existing customer database designations created prior to the PSPS program, not a function of identifying and agreeing to additional specific critical facilities in partnership with first/emergency responders and/or local government entities. Therefore, as stated above, PG&E does not currently have any non-Public Safety Partner critical facilities designated as priority notification entities meeting the D.19-05-042 pg.A7 definition of priority notification entities.

- After the 2019 events, PG&E has updated their Public Safety Partners and Critical Facilities designations, based on the approach and timeline as described in PG&E's biweekly Corrective Action report (section 2.g.), which allows for PG&E to further distinguish and categorize Public Safety Partners separate from Critical Facilities.
- Because Public Safety Partners that are also agencies do not have SPIDs, the data reported represents notifications to PG&E's customers of record with SPIDs and does not represent the automated Public Safety Partner notifications sent to agencies via PG&E's agency notification system, as described in the following data response provided on July 24, 2020: De-EnergizePowerLines_DR_CalAdvocates_021 Question 2.

Table 2: The Breakdown of the 3,900 Customers, by Customer Class

Number of SPIDs by Customer Class	October 26 to November 1, 2019 De-Energization Event
Agricultural	29
Commercial (Please do NOT consolidate this figure with the number of industrial customers)	723
Industrial (Please do NOT consolidate this figure with the number of commercial customers)	
Residential	3,151
California State Government	13
Total Number of SPIDs	3,916

Table 3: The Number of Medical Baseline Customers among the 3,900 Customers

Number of SPIDs among the 3,900 Customers, by Type	October 26 to November 1, 2019 De-Energization Event
Medical Baseline Customers (who are ALSO residential class)	96

Table 4: A Further Breakdown of the 3,900 Customers (in terms of the number of Service Point ID)

Number of Service Point ID among the 3,900 Customers, by Type	October 26 to November 1, 2019 De-Energization Event
Number of Service Point ID (SPID) who are Public Safety Partners (Please do NOT consolidate this figure with the number of priority notification entities)	36 public safety partners as defined by D.19-05-042 p.A4
Among the Public Safety Partners identified in the above row , the number of customer accounts which are ALSO critical facilities	36 public safety partners as defined by D.19-05-042 p. A4 are also critical facilities
Number of SPID who are priority notification entities (Please do NOT consolidate this figure with the number of Public Safety Partners)	PG&E does not have any priority notification entities identified per the D.19-05-042 p. A7 definition beyond public safety partners. (See Q7 response provided prior to tables.)
Among the priority notification entities identified in the above row , the number of SPID which are ALSO critical facilities	PG&E does not have any priority notification entities identified per the D.19-05-042 p. A7 definition beyond public safety partners. (See Q7 response provided prior to tables.)
The number of SPID who are critical facilities <u>but</u> are NEITHER Public Safety Partners NOR priority notification entities	11
Total Number of SPID who are Critical Facilities among the 3,900 customers	47

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q08		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q08		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Names and Addresses of the Critical Facilities

QUESTION 08

For the **critical facilities among the 3,900 customers** that PG&E failed to notify, please state the impacted critical facilities' names, addresses, and responsibility.

ANSWER 08

PG&E identified facilities based on the list of Critical Facilities provided in De-EnergizePowerLines_DR_CalAdvocates_016, Question 3, on May 14, 2020. See attachment *De-EnergizePowerLines_DR_CalAdvocates_026_Q08Atch01_CONF.xlsx*.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q09		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q09		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Timing of the Missed Advance Notifications

QUESTION 09

For **the 3,900 customers that PG&E failed to notify:**

- a) How many customers never received any notification from PG&E even after the de-energization event had started?
- b) Let us define the notification delay for a customer as the duration of time. The duration would start from when the de-energization event was initiated until the customer first received notification from PG&E.

Among **these 3,900 customers** who did not receive advance notification but who later received delayed notification (i.e., after the de-energization event started):

- i. What was the **arithmetic average (or mean)** notification delay, expressed in minutes?
- ii. What was the **median** notification delay, expressed in minutes?
- iii. What was the **shortest** notification delay, expressed in minutes?
- iv. What was the **longest** notification delay, expressed in minutes?

ANSWER 09

- a) Within the population of approximately 3,900 SPIDs, all customers received notification.
- b) PG&E is treating notification delay for the approximately 3,900 SPIDs as the difference between notification launch time and outage start time by SPID.
 - i. The arithmetic average (or mean) notification delay was 2,775 minutes.
 - ii. The median notification delay was 2,946 minutes.
 - iii. The shortest notification delay was 1,138 minutes.
 - iv. The longest notification delay was 3,146 minutes.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q10		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q10		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Timing of the Missed Advance Notifications

QUESTION 10

As updated in the Amended Post-Event Report submitted on July 24, 2020, PG&E did not notify a total of 25,900 customer accounts ahead of the October 26 to November 1, 2019 de-energization event. For **these 25,900 customers**:¹

- a) How many customers never received any notification from PG&E even after the de-energization event had started?
- b) Let us define the notification delay for a customer as the duration of time. The duration would start from when the de-energization event started until the customer first received notification from PG&E, but only after the de-energization event had started.

Among these **25,900 customers** who did not miss advanced notification but who did receive delayed notification after the de-energization event started:

- i. What was the **arithmetic average (or mean)** notification delay, expressed in minutes? Please refer to beginning of part (a) of this question for the definition of notification delay (as duration).
- ii. What was the **median** notification delay, expressed in minutes?
- iii. What was the **shortest** notification delay, expressed in minutes?
- iv. What was the **longest** notification delay, expressed in minutes?

¹ PG&E, *Amended Post-Event Report for October 26 to 29, 2019*, July 24, 2020, pp. 1 to 2, in which PG&E amended the total number of customers who did not receive advance notification from the count of 22,000 (based on the amendment submitted on January 27, 2020) to 25,900 (based on the amendment submitted on January 24, 2020). See, *Attachment PubAdv-PGE-OSC-17_Attch02.pdf* to this data request.

ANSWER 10

- a) For SPIDs that had an outage of greater than 1 hour, 21,987 SPIDs did not receive any notification.
- b) PG&E is treating notification delay for the approximately 25,900 customers as the difference between notification launch time and outage start time by SPID.
 - i. The arithmetic average (or mean) notification delay was 2,775 minutes
 - ii. The median notification delay was 2,946 minutes
 - iii. The shortest notification delay was 1,138 minutes
 - iv. The longest notification delay was 3,146 minutes

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 026-Q11		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 026-Q11		
Request Date:	August 4, 2020	Requester DR No.:	026
Date Sent:	August 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Measures to Prevent Future Failures Similar to This Failure to Notify 3,900 Customers

QUESTION 11

Since PG&E discovered its failure to notify the 3,900 customers,

- a) What measures **has** PG&E put in place to prevent failures of similar nature (e.g., data, data analytic, data query issues, and so on) from happening again? Please explain PG&E's measures in detail, even if they entail database structures and queries.
- b) Please provide the completion dates and/or the anticipated completion dates for the measures identified in part (a) of this question.
- c) **Moving forward**, what measures **will** PG&E put in place to prevent failures of a similar nature (e.g., data, data analytic, data query issues, and so on) from happening again? Please explain PG&E's measures in detail, even if they entail database structures and queries.
- d) Please provide the anticipated completion dates for the measures identified in part (c) of this question.

ANSWER 11

PG&E objects to this data request on the grounds that measures to improve data analysis for notifications and post-event reporting are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving this objection, PG&E responds as follows:

- a. PG&E interprets this question to be asking what measures PG&E has put into place to avoid future missed customer notifications. Please see response to Question 1(b) for an explanation of the substations added late in the PSPS planning process, resulting in the missed customer notifications; see also

PG&E's opening testimony (and pp. 3-15) and PG&E's rebuttal testimony (at p. 3-5) for a further explanation of this issue.

Prior to the 2019 wildfire season, PG&E established a process to identify distribution substations that would be affected by a transmission line's de-energization during a PSPS event and performed a study of its transmission lines to identify those potential substation impacts. This process continued to evolve with improvements through the 2019 wildfire season as PG&E continued to enhance the transmission study. In 2020, PG&E has further improved the process to quickly and accurately identify distribution substations by updating the transmission base case model and internal processes to ensure that all substations are identified and communicated. As of August 2020, PG&E has undergone multiple full-day exercises to test these processes and to identify and address areas for improvement.

- b. The improvements described in response to Question 11.a. have been implemented.
- c. Please see the response to Question 11.a.
- d. Please see the response to Question 11.b.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q01		
Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Priority Notification Requirement

QUESTION 01

The De-Energization Guidelines set forth in Appendix A to Decision (D.) 19-05-042 state as follows:

Consistent with the principles of the State Emergency Management System, whenever possible, **priority notification should occur to the following entities, at a minimum:¹ public safety partners, as defined herein, and adjacent local jurisdictions that may lose power as a result of de-energization.** Notice to all other affected populations, including access and functional needs populations, may occur after the utility has given priority notice; however, access and functional needs populations may require additional notification streams. This guideline is not meant to be restrictive; utilities may provide priority notification to a broader subset of customers, e.g. certain critical facilities, to promote public safety.² (Emphasis Added.)

a) At the time of the three de-energization events in October 2019,³

- i. Did PG&E have a definition of “priority notification” to aid staff in complying with the De-Energization Guidelines requirement that public safety partners receive priority notification?
 - If so, what was PG&E’s definition of priority notification, including but not limited to the manner in which priority notification should be given?
- ii. How many hours before the start of a de-energization event would a notification qualify as a “priority notification”?

¹ D.19-05-042, p. A7, which states in footnote #3 that “[t]he Commission’s adopted definition of public safety partners does not include critical facilities and infrastructure beyond water utilities and communication providers. The utility may, in partnership with first/emergency responders and/or local government entities, identify other critical facilities that should receive priority notice. This guideline is intended to set a floor, not a ceiling for priority notification.” (Emphasis Added.)

² D.19-05-042, p. A7.

³ The three de-energization events are PG&E’s October 9 to 12, 2019, October 23 to 25, 2019, and October 26 to November 1, 2019 de-energization events.

iii. Which entities would receive priority notification from PG&E?

b) Please fill in Table 2 below:

TABLE 2
PUBLIC SAFETY PARTNERS WHO DID NOT RECEIVE PRIORITY NOTIFICATION

Number of Customer Accounts	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
The number of customer accounts of public safety partners who did not receive priority notification, as in part (a) of this question.			

- c) What was PG&E's definition of public safety partners at the time of the three de-energization events in October 2019?
- d) **Specifically at the time of the three de-energization events in October 2019**, did PG&E include critical facilities beyond water utilities and communication providers in its definition of public safety partners?

ANSWER 01

PG&E objects to this data request on the grounds that it is not within the scope of issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q02		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q02		
Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

The Timing of Notification Requirement

QUESTION 02

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state that:

At a minimum, notification to public safety partners **must occur when a utility activates its Emergency Operations Center in anticipation of a de-energization event or whenever a utility determines that de-energization is likely to occur, whichever happens first.** In addition, the electric investor-owned utilities **must provide notice when a decision to de-energize is made,** at the beginning of a de-energization event, when re-energization begins and when re-energization is complete.¹ (Emphasis Added.)

Please fill in Table 1 below with relevant details:

¹ D.19-05-042, p. A8.

TABLE 1
TIMING OF ACTIVATION OF THE EMERGENCY OPERATION CENTER, DETERMINATION OF
DE-ENERGIZATION, AND NOTIFICATION OF PUBLIC SAFETY PARTNERS

Part	Questions	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
(a)	When did PG&E activate its Emergency Operations Center in anticipation of the de-energization event?			
(b)	When did PG&E first determine that the de-energization event would likely to occur?			
(c)	If PG&E activated its Emergency Operation Center first (before determining that de-energization) would likely occur), the number of public safety partners that were not informed priory to this deadline (as in time reported in part (a) or (b) of this question, whichever came first) (in terms of the number of customer accounts)			
(d)	If PG&E first determined that de-energization would likely occur (before activating its Emergency Operation Center), the number of public safety partners that were not informed priory to this deadline (as in time reported in part (a) or (b) of this question, whichever came first) (in terms of the number of customer accounts)			

ANSWER 02

PG&E objects to this data request on the grounds that it is not within the scope of issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q03		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q03		
Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Requirement to Provide Points of Contact to Local Jurisdictions, First Responders, and All Other Public Safety Partners

QUESTION 03

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state that:

The electric investor-owned utilities must provide utility personnel **24-hour points of contact, including secondary and tertiary contacts¹ to affected local jurisdictions/first responders.**

The electric investor-owned utilities must identify clear points of contact **for all other public safety partners, including affected community choice aggregators, publicly owned utilities/electric cooperatives, water and communications providers.** The electric investor-owned utilities must have 24-hour contacts with secondary contacts at a minimum and tertiary contacts if possible.² (Emphasis Added.)

Please fill in Table 3 below with the relevant figures:

¹ D.19-05-042, Findings of Facts No. 12, p. 117.

² D.19-05-042, p. A10.

TABLE 3
TIMING OF ACTIVATION OF THE EMERGENCY OPERATION CENTER, DETERMINATION OF
DE-ENERGIZATION, AND NOTIFICATION OF PUBLIC SAFETY PARTNERS

Part	Number of Customer Accounts	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
(a)	Number of customer accounts of affected local jurisdictions or first responders who were not provided with primary, secondary, and tertiary 24-hour points of contact .			
(b)	Number of customer accounts of all other public safety partners (including affected CCAs, publicly owned utilities/electric cooperatives, water and communications providers) who were NOT provided with <u>both</u> primary and secondary 24-hour contacts.			

ANSWER 03

PG&E objects to this data request on the grounds that it is not within the scope of issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q04		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q04		
Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Requirement to Update Contact Lists for First / Emergency Responders / Public Safety Partners

QUESTION 04

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state that:

[For first/ emergency responders/public safety partners, t]o ensure accuracy of contacts, the electric investor-owned utilities **are required to update [contact] lists annually at least two months in advance of the start of the wildfire season and conduct communication exercises** prior to wildfire season to confirm their ability to rapidly disseminate information.¹ (Emphasis Added.)

- a) Please provide documentation supporting the fact that PG&E updated the contact lists (for first / emergency responders / public safety partners) **at least two months in advance of the start of the 2019 wildfire season** as provided in the De-Energization Guidelines.
- b) Please provide documentation supporting the fact that PG&E conducted communication exercises, **prior to the 2019 wildfire season**, to confirm its ability to rapidly disseminate information to these first / emergency responders / public safety partners as provided in the De-Energization Guidelines?

ANSWER 04

- a) The De-Energization Guidelines cited in this paragraph were issued on June 4, 2019. In the decision adopting those Guidelines, the Commission explained: “The Commission recognizes that identification of first / emergency responders, Critical Facilities / critical infrastructure contacts and AFN populations will be an ongoing process that will not be fully complete in advance of the 2019 wildfire season.” D.19-05-042, at pp. 78-79. Accordingly, PG&E interprets this question to ask for documentation about PG&E’s efforts to update contact lists in advance of the October 2019 PSPS events.

¹ D.19-05-042, p. A11.

During the month of July 2019, PG&E conducted PSPS preparedness outreach to first / emergency responders / Public Safety Partners. This outreach was focused on the following three outcomes: (1) Obtaining input on identifying Critical Facilities within their jurisdiction; (2) Obtaining input on organizations or contacts that should be included in PG&E's PSPS outreach focused on AFN support; (3) Obtaining their updated contact information to be used for PSPS public safety partner agency notifications.

De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch01_CONF.xlsx includes a list of the jurisdictions (city and counties) to which PG&E reached out and which jurisdictions provided feedback. The tracker was an ongoing tool PG&E used for all of 2019 to capture any incoming information related to City/County Agency notification contact information, even after the October events. Also attached as *De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch02.pdf* is the email that was sent to each jurisdiction. PG&E updates its contact list system in real-time and does not have a list from a specific point in time that predates this outreach.

Additionally, there were three primary ways in which Public Safety Partners and Critical Facilities could update their contact information: (1) PG&E's customer account representatives updated assigned customers' emergency contacts; (2) Customers updated their contact information directly in their online account, which was encouraged through various channels of outreach described below; and (3) PG&E's customer service representatives (CSRs) in PG&E's Customer Service Call Center are always asked to confirm customer contact information during non-emergency phone calls. More details on each are provided below:

- Customer Account Representative Assigned Business Customer Outreach in Tier 2 / 3 HFTDs: In 2019, PG&E account representatives completed two waves of outreach (described below) with assigned non-residential customers, which included Public Safety Partners and Critical Facilities. The outreach focused on obtaining updated PSPS emergency contact information and sharing other relevant preparedness information:
 1. Wave 1 Outreach (April 2019 – May 2019): Outreach focused on making contact with all commercial and industrial customers served by lines that run through Tier 2 and Tier 3 HFTDs.
 2. Wave 2 Outreach (July 2019 – August 2019): Outreach focused on making contact with all neighboring commercial and industrial customers served by lines that run through Tier 2 and Tier 3 HFTDs but are not physically located in a Tier 2 and 3 HFTD.

De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch03.xlsx summarizes the outcomes of the two waves of PSPS-related outreach described above. The counts of customers included within these waves refer to the master customer account level, which usually represents multiple Service Point IDs (SPID). If customers were "unassigned" (i.e., did not have a dedicated PG&E representative), which may have been the case for smaller customers, the

Critical Facilities and Public Safety Partners had two additional mechanisms for updating contact information (described in the following bulleted sections).

- Customer and Critical Facility Mail and Email Outreach: In Section 3.1 of its September 4, 2019 and March 4, 2020 PSPS progress reports, PG&E describes its outreach to all customers of record, which include Critical Facilities and Public Safety Partners. The following attachments are some of the key samples of the PSPS preparedness outreach where PG&E sought contact information updates:
 1. *De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch04_CONF.pdf*: In April 2019, PG&E account managers sent the attached email, which included requests to update/confirm contact information to all assigned commercial accounts, which included Public Safety Partners and Critical Facilities.
 2. *De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch05.pdf*: In June 2019, PG&E sent the attached postcard to residential and unassigned non-residential electric customers that did not have any contact information on file.
 3. *De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch06_CONF.pdf*: In June 2019, PG&E sent the attached email to residential and unassigned non-residential electric customers that only had an email on file but had other missing or incomplete contact information.
 4. *De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch07_CONF.pdf*: In August 2019, PG&E sent the attached email as a follow-up to residential and unassigned non-residential electric customers that still only had an email on file but had other missing or incomplete contact information.
 5. *De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch08_CONF.pdf*: In September 2019, another email was sent to Public Safety Partners and Critical Facilities seeking contact information updates, among other relevant preparedness resources (e.g., backup power information, PSPS planning maps, etc.)

PG&E maintains the date the customers' contact information and/or communication preferences were last updated in its Customer Care and Billing (CC&B) Database.

- Call Center Contact Updates: Beginning in April 2019, PG&E's Customer Service Representatives (CSRs) asked customers for updated contact information each time customers made a non-emergency-related call to the contact centers. *De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch09.pdf* includes the customer contact information update process used by CSRs during each call, which is completed once the CSR authenticates that they are in fact speaking to the customer of record. This customer authentication process is documented in *De-EnergizePowerLines_DR_CalAdvocates_027_Q04Atch10.pdf*. These processes are available in PG&E's Customer Call Center reference tool, Knowledge Force (previously called GenRef). CSRs leverage Knowledge Force

on inbound and outbound calls and receive training on this tool in new hire training. When additional processes are added or new articles are created, CSRs receive a communication, such as an Electronic Read and Learn, with direction on what article they should review and reference during customer calls.

Since PG&E began confirming customer contact information in April 2019, millions of non-emergency calls were handled by CSRs which most frequently leveraged the processes described above and attached, and in part, included public safety partners and critical facilities.

- b) PG&E responded to a similar question from the Safety Enforcement Division (SED) in the PSPS OII on April 7, 2020. Please see below for PG&E's response.

See PG&E's March 4, 2020 Progress Report (section 4.1.6 Notification System Test), which summarizes the notification testing that took place in 2019. Additionally, as stated in PG&E's Opening Testimony (p. 3-17, lines 27-31), PG&E used a messaging platform capable of pushing as many as 900,000 phone, text, and email communications, or 2.7 million communications in total, per hour, to customers.

While PG&E had conducted notification tests with employees to validate planned functionality, as well as User Acceptance Testing (UAT), Production Verification Testing, and a number of end-to-end process tests to validate system stability and data integrity, PG&E did not conduct communication exercises with first / emergency responders / public safety partners in 2019. PG&E was not able to plan for such exercises with first / emergency responders / public safety partners in advance of the 2019 wildfire season.

Once PSPS events commenced in 2019, PG&E was responsive to emerging communication needs as they were identified. This is described in the "Local and State Public Safety Partner Engagement" and "Lessons Learned" sections of each ESRB-8 Event report. Examples of communication improvements made during PSPS events include adjusting the quantity of daily agency calls and providing direct points of contact to key stakeholders

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q05		
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Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Requirement to Update Contact Lists for Critical Facilities and Critical Infrastructure

QUESTION 05

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state that:

To ensure accuracy of contacts, the electric investor-owned utilities are **required to update critical facility and critical infrastructure lists annually at least two months in advance of the start of wildfire season**. The electric investor-owned utilities should work with points of contact to encourage proactive updating of information throughout the year in the event of a change, beyond the annual update required of the utilities. The electric investor-owned utilities **should prioritize identification of appropriate contacts for critical facilities and infrastructure located within Tier 3 and 2 high fire threat districts, followed by adjacent jurisdictions that may be impacted in the event of de-energization.**¹

- a) Please provide documentation supporting the fact that PG&E updated the contact lists (for critical facilities and critical infrastructure) at least two months in advance of the start of the 2019 wildfire season as provided in the De-Energization Guidelines?
- b) For any of the three de-energization events in October 2019 that PG&E did **not** prioritize identification of appropriate contacts for these critical facilities and critical infrastructure located within Tier 3 and 2 high fire threat districts,
 - i. Please provide:
 - The number of customer accounts of these critical facilities or critical infrastructure, and
 - A list of these facilities.
 - ii. Please explain why PG&E did not provide advanced notification to critical facilities impacted the October 2019 de-energization events?

¹ D.19-05-042, p. A11.

ANSWER 05

The De-Energization Guidelines cited in this paragraph were issued on June 4, 2019. In the decision adopting those Guidelines, the Commission explained: “The Commission recognizes that identification of first/emergency responders, critical facilities/critical infrastructure contacts and AFN populations will be an ongoing process that will not be fully complete in advance of the 2019 wildfire season.” D.19-05-042, at pp. 78-79. Accordingly, PG&E interprets this question to ask for documentation about PG&E’s efforts to update contact lists in advance of the October 2019 PSPS events.

See response to question 4(a) For critical facilities, PG&E followed the same process described in the response to question 4(a), and specifically in regard to the outreach conducted to the Public Safety Partners that were customers of record.

PG&E objects to part b.(i). of this data request on the grounds that it is not within the scope of issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019.

Subject to and without waiving this objection, PG&E responds as follows: Please see PG&E’s Opening Testimony, pp. 3-10 through 3-16, for an explanation of the causes of missed customer notifications.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q06		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q06		
Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Required Notification Content of In Advance of the Three De-Energization Events

QUESTION 06

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state that:

Advanced Outreach and Education [In Advance of a De-Energization Event]

With the goal of having a common understanding of situational awareness among public safety partners throughout California, each electric investor-owned utility **must clearly articulate thresholds for strong wind events as well as the conditions that define “an extreme fire hazard” (humidity, fuel dryness, temperature) that the electric investor-owned utility evaluates in considering whether to de-energize.** This information may vary for different jurisdictions and topographies; **however, the information must be provided to and be readily available to public safety partners and the public.**^{1,2}
(Emphasis Added.)

- a) Please provide the means (and the supporting documentation) through which PG&E clearly articulated the following to the **affected public safety partners and the public**, in advance of and directly preceding **each** of the three October 2019 de-energization events:
- i. The thresholds for strong wind events, and
 - ii. The conditions that define “an extreme fire hazard” (humidity, fuel dryness, temperature) that the electric investor-owned utility evaluates in considering whether to de-energize.
- b) Did PG&E make the information specified in part (a) of this question available on its website at the time of the three October 2019 de-energization events?
- i. If so, when?

¹ D.19-05-042, p. A14.

² D.19-05-042, p. A14, which states in footnote #9 that “[f]or example, on the utility website.”

ANSWER 06

PG&E objects to this data request on the grounds that it is not within the scope of issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 027-Q07		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q07		
Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Required Notification Content Directly Preceding the Three De-Energization Events

QUESTION 07

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state that:

Notification [Directly] Preceding a De-Energization Event

The electric investor-owned utilities **must convey to public safety partners at the time of first notification preceding a de-energization event information regarding the upcoming de-energization, including estimated start time of the event, estimated duration of the event, and estimated time to full restoration.** The electric investor-owned utilities must use the previously established contact channels developed in advance of the 2019 wildfire season and **should strive to provide contact according to the timeframes adopted in these guidelines.** The electric investor-owned utilities **must provide the number of medical baseline customers in the impacted area to first/emergency responders and/or local jurisdictions....**

The electric investor-owned utilities **must partner with local public safety partners to communicate with all other customers that a de-energization event is possible, the estimated start date and time of the de-energization event, the estimated length of the de-energization event, which may be communicated as a range, and the estimated time to power restoration, which again, may be communicated as a range.** Communications should state when the customer can next expect communication about the de-energization event. Communication, consistent with best practices articulated in the California Alert and Warning Guidelines must answer five key recipient questions: (1) Who is the source of the warning; (2) What is the threat; (3) Does this affect my location; (4) What should I do; and (5) What is the expected duration of the event.¹ (Emphasis Added.)

Please fill in Table 4 below with the relevant figures:

¹ D.19-05-042, pp. A16 to A18.

TABLE 4
REQUIRED CONTENT OF NOTIFICATION PRECEDING THE THREE DE-ENERGIZATION EVENT

Part	Description	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
(a)	<p>Number of customer accounts of public safety partners whose first notification preceding the start of the de-energization event included:</p> <ul style="list-style-type: none"> • The estimated start time of the event, • The estimated duration of the event, and • The estimated time to full restoration. 			
(b)	<p>Number of customer accounts of public safety partners whose first notification preceding the start of the de-energization event did NOT include <u>ALL</u> of the following:</p> <ul style="list-style-type: none"> • The estimated start time of the event, • The estimated duration of the event, and • The estimated time to full restoration. 			

(c)	<p>Number of customer accounts of public safety partners whose 1-to 24-hour advance notification before the de-energization event included ALL of the following:</p> <ul style="list-style-type: none"> • The estimated start time of the event, • The estimated duration of the event, and • The estimated time to full restoration. 			
(d)	<p>Number of customer accounts of public safety partners whose 1-to 24-hour notification before the de-energization event did <u>not</u> include <u>ALL</u> the following:</p> <ul style="list-style-type: none"> • The estimated start time of the event, • The estimated duration of the event, and • The estimated time to full restoration. 			

(e)	<p>Number of customer accounts of public safety partners whose 24-to 48-hour advance notification before the de-energization event included <u>ALL</u> of the following:</p> <ul style="list-style-type: none"> • The estimated start time of the event, • The estimated duration of the event, <u>and</u> • The estimated time to full restoration. 			
(f)	<p>Number of customer accounts of public safety partners whose 24-to 48-hour notification before the de-energization event did <u>not</u> include <u>ALL</u> the following:</p> <ul style="list-style-type: none"> • The estimated start time of the event, • The estimated duration of the event, <u>and</u> • The estimated time to full restoration. 			

(g)	Number of customer accounts of public safety partners whose FIRST notification took place 48-to 72-hour in advance of the de-energization event <u>and</u> contained all of the information, as listed in part (a) of this question.			
(h)	Number of customer accounts of public safety partners whose FIRST notification took place 1-to 48-hour in advance of the de-energization event <u>and</u> contained all of the information as listed in part (a) of this question.			
(i)	The number of customer accounts of medical baseline customers in the impacted area that PG&E provided first/emergency responders and/or local jurisdictions.			
(j)	The total number of customer accounts who are medical baseline customers affected during the de-energization event.			

- f) For each of the three de-energization events, please provide relevant documentation showing that PG&E **partnered with local public safety partners to communicate (with all other customers ahead of the event)** that:
- A de-energization event is possible,
 - The estimated start date and time of the de-energization event,

- iii. The estimated length of the de-energization event, which may be communicated as a range, **and**
- iv. The estimated time to power restoration, which again, may be communicated as a range.
- g) For the communications referenced in part (f) of this question, please provide supporting documentations of the communications for each of the three de-energization events:
 - i. Stating when the customer can next expect communication about the de-energization event; and
 - ii. Answering the five key recipient questions: (1) Who is the source of the warning; (2) What is the threat; (3) Does this affect my location; (4) What should I do; and (5) What is the expected duration of the event.

ANSWER 07

PG&E objects to this data request on the grounds that it is not within the scope of issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q08		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q08		
Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 08

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state that:

The electric investor-owned utilities **must provide up-to-date information, including a depiction of the boundary of the de-energization event**, on their websites' homepage and a dedicated Public Safety Power Shut-off webpage regarding the de-energization event. The electric investor-owned utilities, in partnership with local public safety partners, **must establish and communicate a 24-hour means of contact that customers may use to ask questions and/or seek information.**¹ (Emphasis Added.)

Please fill in Table 5 below for the three de-energization events:

¹ D.19-05-042, p. A18.

TABLE 5
PG&E’S WEBSITE, DE-ENERGIZATION WEBPAGE, AND 24-HOURS MEANS OF CONTACT FOR
PG&E’S CUSTOMERS

Part	During the De-Energization Events	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
(a)	The dates and time during which the up-to-date information , including a depiction of the boundary of the de-energization event, was unavailable on PG&E’s website.			
(b)	The dates and time during which the up-to-date information , including a depiction of the boundary of the de-energization event, was unavailable on PG&E’s dedicated Public Safety Power Shut-off webpage.			
(c)	The dates and time during which PG&E failed to provide a 24-hour means of contact that customers may use to ask questions and/or seek information.			

ANSWER 08

PG&E objects to parts b and c of this data request on the grounds that availability of information on the Public Safety Power Shutoff webpage and a 24-hour means of contact for customers are not among the issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019 as within the scope of the Order to Show Cause phase of this proceeding.

Subject to and without waiving this objection, PG&E responds as follows:

In 2019, up-to-date information was available and accessible on PG&E’s website throughout the October 23–25 and October 26–November 1 PSPS events. For the October 9–12 event, however, there were times during which the website was difficult to access or inaccessible to many users. PG&E’s Opening Testimony, pp. 4-8 through 4-11, describe these accessibility issues.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q09		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q09		
Request Date:	August 13, 2020	Requester DR No.:	027
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PG&E Witness:		Requester:	Pui-Wa Li

Methods Communicating the De-Energization Events with the Public

QUESTION 09

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state as follows:

What Methods Should the Electric Investor-Owned Utilities Use to Communicate a De-Energization Event with the Public?

The California Alert and Warning Guidelines state that “people rarely act on a single warning message alone. To be effective, warnings should be delivered in various formats via various media, both to increase reliability of warning delivery and to provide a sense of corroboration that will encourage recipients to take protective actions.” The electric investor-owned utilities must develop notification strategies for all customer groups affected by de-energization, and **the electric investor-owned utilities must partner with local and state public safety partners, whenever possible, to develop notification strategies**. In order to be effective, notifications should be delivered in multiple formats across several media channels, both to increase the potential a message successfully reaches an impacted population and to provide a sense of corroboration that will encourage individuals to take protective actions. Customer notifications should include, but are not limited to, telephonic notification, text message notification, social media advisories, emails, and messages to agencies that service disadvantaged communities within an impacted area to allow them to amplify any pertinent warnings. Communication methods must consider the geographic and cultural demographics of affected areas, e.g. some rural areas lack access to broadband services. Communications must also be delivered in English, Spanish, Chinese (including Cantonese, Mandarin and other Chinese languages), Tagalog and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities’ service territories.

The electric investor-owned utilities **must develop a strategy for how communication will occur with affected customers once de-energization has begun and during re-energization, recognizing that communication channels may be restricted due to the loss of power. The electric investor-owned utilities should develop this**

strategy in coordination with public safety partners.¹ (Emphasis Added.)

- a) For the **three** de-energization events, what notification strategy did PG&E develop **in partnership** with the local and state public safety partners?
- b) When PG&E's website was unavailable during the October 9 to 12, 2019 de-energization event, what was PG&E's strategy for communicating with affected customers "once de-energization ha[d] begun and during re-energization, recognizing that communication channels may be restricted due to the loss of power"?
- c) With reference to your response to part (b) of this question, specifically for the October 9 to 12, 2019 de-energization event, what communication strategy did PG&E develop **in coordination with** public safety partners?

ANSWER 09

PG&E objects to this data request on the grounds that it is not within the scope of issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019.

¹ Decision 19-05-042, pp. A18 to A19.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 027-Q10		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 027-Q10		
Request Date:	August 13, 2020	Requester DR No.:	027
Date Sent:	August 26, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Communication & Coordination with Public Safety Partners Before and During the De-Energization Events

QUESTION 10

The De-Energization Guidelines set forth in Appendix A to D.19-05-042 state as follows:

How Should the Electric Investor-Owned Utilities Communicate and Coordinate with Public Safety Partners **Before and During** a De-Energization Event?

Consistent with the State Emergency Management System, the electric investor-owned utilities **will be responsible for contacting local public safety officials in impacted jurisdictions prior to and during a de-energization event**. The electric investor-owned utilities must communicate an impending de-energization event to local and state officials. The electric investor-owned utilities must work with public safety partners to disseminate all information in formats and through processes that are used by public safety partners during other emergencies, including developing notification messaging consistent with the California Public Alert and Warning System.¹ (Emphasis Added)

Please fill in Table 6 below:

¹ Decision 19-05-042, pp. A19 to A20.

TABLE 6
CONTACT WITH LOCAL PUBLIC SAFETY OFFICIALS AND PUBLIC SAFETY PARTNERS PRIOR TO
AND DURING THE THREE DE-ENERGIZATION EVENTS

Part	Description	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
(a)	The number of local public safety officials in impacted jurisdictions who were NOT contacted prior to AND during the de-energization event.			
(b)	The number of customer accounts of public safety partners in impacted jurisdictions who were NOT contacted prior to AND during the de-energization event.			
(c)	The number of customer accounts of public safety partners in impacted jurisdictions who were NOT contacted prior to AND during the de-energization event.			

ANSWER 10

PG&E objects to this data request on the grounds that it is not within the scope of issues identified in the December 23, 2019 Ruling Setting the Scope and Schedule of the Order to Show Cause Against PG&E for Violations Related to the Implementation of the Public Safety Power Shutoffs in October 2019.

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7/16/19

Public Safety Power Shutoff
Email re: Critical Facilities List

SUBJECT: INPUT NEEDED: Updating Your Critical Facilities and Infrastructure List

Hello [Name],

We are reaching out today regarding PG&E's Public Safety Power Shutoff (PSPS) program. There are three key items we were hoping to discuss and work together on:

1. Confirm critical facilities within your jurisdiction
2. Review [City/county] key contact information for PSPS notifications
3. Identify local agencies and organizations that serve the access and functional needs (AFN) customers within your jurisdiction

Confirming Critical Facilities

PG&E maintains a list of critical facilities that we use to prioritize PSPS notifications. This list is in alignment with the CPUC's definition of critical facilities. Notifications to critical facilities will be made in advance of notifying customers and will include a link to download PSPS-related outage maps and view other event-specific information. Given that outages can last for multiple days, we want to make sure we're prioritizing our outreach accordingly. Critical facilities, as defined by the CPUC, include the following:

- **Emergency Services Sector:** Police stations, fire stations, emergency operations centers
- **Government Facilities Sector:** Schools, jails and prisons
- **Healthcare and Public Health Sector:** Public Health Departments, medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers and hospice facilities
- **Energy Sector:** Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly-owned utilities and electric cooperatives
- **Water and Wastewater Systems Sector:** Facilities associated with the provision of drinking water or processing of wastewater including facilities used to pump, divert, transport, store, treat and deliver water or wastewater
- **Communications Sector:** Communication carrier infrastructure including selective routers, central offices, head ends, cellular switches, remote terminals and cellular sites
- **Chemical Sector:** Facilities associated with the provision of manufacturing, maintaining, or distributing hazardous materials and chemicals.

Are there other critical facilities that your community considers the most important from a safety perspective that we should consider verifying and/or adding to our critical facilities and infrastructure list? **Please provide these critical facilities using the attached critical facilities spreadsheet, and provide the contact information if the site is a city/county facility.** Note, we will continue to engage with critical facilities to ensure we have information for a 24/7 contact.

Review [City/County] Key Contact Information

We will also notify public safety partners in advance of and during an event. This notification will occur prior to notifying critical facilities. We have been compiling a list of these key contacts for

Following the wildfires in 2017 and 2018, some of the changes included in this document are contemplated as additional precautionary measures intended to further reduce future wildfire risk.

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7/16/19

your jurisdiction. **As the designated point of contact for your jurisdiction, we ask that you please review the attached contact list spreadsheet and confirm the contact information we have is correct.** Please note you will not see your contact information in the attached, however, we do have this information on file.

Outreach to Access and Functional Needs Groups

We are currently preparing PSPS materials that can be shared with access and functional needs (AFN) organizations. This includes educational materials and information on options for signing up to receive alerts in advance of a PSPS event. We ask that you identify departments or organizations that we should reach out to when sharing this information within your community. **Please provide us with their contact information in the attached AFN contact list.**

Thank you in advance for your help in fulfilling this request and for your ongoing partnership in these important safety efforts. We would appreciate these updates no later than **Monday, July 29**. If you have any questions in the meantime, please do not hesitate to reach out to me at the contact information listed below.

Sincerely,

[Name]

PSPS Customer Representative Wave 1 2019 Outreach Results*as of 6/3/19 8:45 AM***Goal Indicator Progress**

Goal Indicator Progress	# of customers	%
# of Customer Contacts	1,203	99.75%
# of Customers Completed	1,168	96.8%
# of Customers Attempted	3	0.2%
# of Customers - Unable to Contact	31	2.6%
# of Customers - Outreach Escalations	1	0.1%
# of Customers Remaining	3	0%
Total Customers	1,206	

PSPS Customer Representative Wave 2 2019 Outreach Results*as of 8/20/19 3:30PM***Goal Indicator Progress**

Goal Indicator Progress	# of customers	%
# of Customer Contacts	1,076	98.72%
# of Customers Completed	1,025	94.04%
# of Customers Attempted	8	0.73%
# of Customers - Unable to Contact	43	3.94%
# of Customers - Outreach Escalations	0	0.00%
# of Customers Remaining	14	1%
Total Customers	1,090	

UPDATE YOUR CONTACT INFORMATION TODAY

**YOUR POWER
MAY NEED TO BE
TURNED OFF
FOR PUBLIC SAFETY**



Please visit pge.com/mywildfirealerts

Following the wildfires in 2017 and 2018, some of the changes included in this document are contemplated as additional precautionary measures intended to further reduce future wildfire risk.
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204

PUBLIC SAFETY POWER SHUTOFF ALERTS

Our most important responsibility is to keep our customers and the communities we serve safe.

If extreme fire danger conditions are forecasted, we may need to turn off electricity for safety. Even if you do not live or work in a high fire-threat area, **your power could be shut off if your community relies on a line that runs through an area experiencing high fire danger.**

Our contact information for you is incomplete. Our goal is to notify customers in advance of turning off power for safety, but we need your updated contact information to do so. Please take the following steps today:

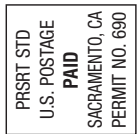
- 1 **Log into your account at pge.com/mywildfirealerts** and click on “Go to Profile & Alerts”
- 2 **Provide your landline, mobile number, email address** and/or an alternate contact who can reach you quickly in advance of an outage
- 3 **You can also call us at 1-866-743-6589** to provide your contact information

To learn more, visit **pge.com/wildfiresafety**.

- Para ayuda en español por favor llame al: 1-866-743-6589
- 要用粵語/國語請求協助, 請致電: 1-866-743-6589
- Để được giúp đỡ bằng tiếng Việt, xin gọi: 1-866-743-6589
- 한국어로 도움을 원하시면 1-866-743-6589 번으로 전화하십시오.



Pacific Gas and Electric Company
P.O. Box 997320
Sacramento, CA 95899



Obtaining or Documenting Phone Numbers and Email Addresses

Overview of obtaining and documenting phone numbers and email addresses for customers

On all authenticated accounts: Check for Alert - Contact Information Last Confirmed More Than 30 Days Ago

- Alert doesn't display
 - Continue with transaction unless
 - Customer requests contact information updated
 - Update to phone numbers and email
 - Do Not click RE-UPDATE/RE-VERIFY button
- Alert displays
 - Required to update ALL phone numbers (all 10 digits) and email addresses in the Customer Preference Detail zone in the [Communication Preference Portal](#) on all authenticated accounts (**Active, Closed and [Write Off](#)**)
 - Click RE-UPDATE/RE-VERIFY button in Dashboard to reset 30 day Alert
 - Customer Contact will automatically be created
 - Contact Class: CUST
 - Contact Type: UPDTREVERIFY
 - Description: Customer info-Update/Re-verify
 - Go back to Control Central
 - If multiple CORs on account, display each COR to see if Alert displays
 - If Alert displays, click alert and click the RE-UPDATE/RE-VERIFY button for each person on the account

- Applies to all calls accessing account information
 - Exception: Emergency Calls - not required to update
- [Customer phone number updated in IVR](#)

Reminders: Required to update phone number(s) and email address accordingly

- **Always** ask the caller to provide this information
 - After authentication of the COR, the entire phone number and email address in the Customer Preference Portal can be shared so they can be appropriately updated
 - Secondary COR (financially responsible) can update all phone numbers listed on the account. Ensure that all numbers are classified detailing which COR the number belongs to
 - Secondary COR (Non-financially responsible) can update all numbers listed on the account. Non-financially responsible parties will not appear in the Customer Preference Details zone, phone number will need to be added as an alternate number for the COR
 - Business Customers indicate as Business Phone-Primary (if not done as main contact number)
 - **Note:** At this time we are unable to add extensions to caller phone numbers
- Add new numbers and email address provided by the COR and only remove/delete numbers that the customer can verify as no longer valid
 - [Documenting Email Address](#)
- Don't ask the customer if the number they are calling from is the best contact number
- Don't automatically add the phone number from the phone console to the account
- Don't duplicate a phone number for the same COR already listed on the account, remove the duplicate number

Suggested Verbiage: "Ms. Brown, in order to have accurate information on file in case of emergency, may I please have your best contact phone numbers and an email address?"

FAQs

Situations

- [Customer requests to list Non COR contact information \(phone/email\) for PSPS notifications](#)
 - [Field Order Process](#)
 - [Input of Email Address](#)
 - [Input of Phone Numbers](#)
 - [Removing email address, customer doesn't have one or doesn't want to provide one](#)
 - [Removing the Only phone number on the account](#)
 - [Reasons for Obtaining Good Telephone Numbers and email address](#)
-
-

Customer requests to list Non COR contact information (phone/email) for PSPS notifications

Once authenticated a COR can verbally authorize the addition of a Non COR's email/phone number

- These cannot be listed as primary

- They should not be selected for any other notifications (i.e. pay plan, etc.)
- Phone Number – List as an ALTERNATE contact number and assign it to the COR requesting the number be added
- Email – List as an ALTERNATE email
- Advise the COR we recommend you notify the person who's contact information this is to let them know they will receive notifications regarding your account/address

Non COR calls to update contact information

- We can remove but no changes or additions should be made
- Advise the Non COR we can remove their information but if they want different contact information listed the COR will need to make that change
 - They can update their contact information online at pge.com/youraccount

[back to top](#)

Field Order Process

Contact phone numbers are entered on Field Order page using Main tab

- Customers must provide a contact phone number on all field orders
 - Always ask the customer to provide this information
 - After authentication of the COR, the entire phone number(s) on their person record can be shared so they can be appropriately updated
 - Unless the customer provides the phone number, do not automatically add the phone number from the phone console to the account

- Unless directed otherwise in the Field Order process (Examples: Pest Control Company Fumigations, Master Metered or Mobile Home Park Field Orders, etc)
- One contact number per Field Order

Primary phone numbers are populated on Field Orders

- When a phone number is added or updated on a Field Order it does not scrape over to the existing account/person record

[back to top](#)

Input of Email Address

- Enter the complete email address on the Communication Preference Portal
 - Confirm email address and spelling with customer and SAVE
- If email already exists, confirm email address and spelling with customer
 - SAVE any changes

[back to top](#)

Input of Phone Numbers

Always enter **valid** phone numbers and remove outdated numbers. **NOTE:** Leave the EXTENSION FIELD **BLANK** - Our system can't recognize the information and blocks automated calls to the number

- Home or Business phone types will be considered primary phone numbers)
 - Home phone number: indicate as Home Phone number
 - Business phone number: indicate as Business Phone-Primary
- Additional contact numbers should be listed on subsequent lines and the correct phone type selected from the dropdown box
 - Cell phone number: indicate as Cellular Phone
 - Business phone number: indicate as Business Phone-Primary (if not done as main contact number); at this time we are unable to add extensions to caller phone numbers
 - Message phone number: indicate as Alternate Contact Phone
- No phone number is available
 - Leave phone number field blank
 - Do not enter an invalid phone number (i.e. 559-000-0515)
- ANI (Automatic Number Identification)
 - Do not assume ANI is a correct home or business number
 - Do not automatically type ANI number into customer records or field orders
- If customers ask if we receive their phone number or other information based on their phone number & account number match
 - Answer yes
 - If customer has concerns about this, advise them that PG&E regards their phone number as confidential and will not release it to others except as provided by law

Special Circumstances

- Not Financially Responsible, Authorized Third Party and Property Management Authorization (PMA)
 - Add alternate phone number if it does not currently exist
 - In the Customer Preference Portal select phone type: ALTERNATE CONTACT PHONE
- [Do not Use Phone Numbers](#)

[back to top](#)

Removing email address, customer doesn't have one or doesn't want to provide one

- Leave the email address field blank
- Remove any Decline or NA reference from field

[back to top](#)

Removing the Only phone number on the account

- **Create Customer Contact on main customer of record**
 - CONTACT CLASS: Other
 - CONTACT TYPE: Other
 - COMMENTS:
 - Phone number being deleted (i.e. Deleting: xxx-xxx-xxxx)
 - Reason why
 - If multiple situation, include specific Account, Premise, Service Agreement or Service Point

[back to top](#)

Reasons for Obtaining Good Telephone Numbers and email address

- Allows customers to use IVR
- Support of the Community Wildfire Safety Program notification efforts
- Promotes [Field Call Ahead Notification](#)
 - Helps our field partners make contact with customers
 - Eliminates misconceptions
 - Improves internal processes
 - Decreases CGI calls

[back to top](#)

ARTICLE FEEDBACK

[Send Us Feedback](#)

LAST MODIFIED DATE

7/8/2020 10:46 AM

Customer Authentication Method

TITLE

Customer Authentication Method

URL NAME

5108

ARTICLE BODY

Process to authenticate a Customer of Record (COR) prior to discussing or releasing account information

Authentication must be made Prior to releasing any account information

- The system provides the initial authentication
- Following the appropriate process below will complete COR authentication
 - It is not necessary to authenticate further by asking for the last 4 digits of the SSN/TIN or the account number if system authenticated
 - **On all authenticated accounts:** [Check for Alert - Contact Information Last Confirmed More Than 30 Days Ago](#)
 - It is required to update phone numbers and email addresses in the [Communication Preference Portal](#), regardless of Finesse indicating True or False
 - Exception: Emergency Calls - not required to update
- [Gender Bias and Customer Satisfaction](#)

Was the caller authenticated?

- [Finesse Indicator: FALSE](#)
- [Finesse Indicator: TRUE](#)
- [Finesse Unavailable](#)

- [No SSN/ TIN / ID on account](#)
 - [Unable to authenticate COR](#)
 - [When a call is transferred to an SSR](#)
-
-

Finesse Indicator: FALSE or Finesse unavailable

Note: If there is a password on the account, the [Password](#) must be provided

- Main Customer of Record (MCOR) may provide Password or Security answer
 - All other CORs or authorized 3rd party can only provide Password
 - Don't ask a COR or authorized 3rd party the security question
- [Password Cannot be Provided](#)
 - Don't provide the existing password or security answer even after authenticated

Reminders: Required to update contact information accordingly if the alert 'Contact Information Last Confirmed More Than 30 Days Ago' exists

- **Always** ask the caller to provide this information
 - After authentication of the COR, the entire phone number in the Communication Preference Portal can be shared so they can be appropriately updated
- **Do not** automatically add the phone number from the phone console to the account

FALSE or Finesse Unavailable process

1. Verify caller's name matches COR account name
 - COR Match - Go to the next step
 - Last name provided does not match
 - Verify first name and confirm it matches
 - Ask for account number or last 4 digits of SSN/TIN to authenticate
 - Follow process [Alias or Updating Name](#) to correct last name
 - [Non COR authentication process](#)
2. Compare account phone number with Finesse console Automatic Number Identification (ANI) or EntPhone fields
 - MATCH = COR is authenticated
 - **Reminder:** Required to update contact information accordingly if the alert 'Contact Information Last Confirmed More Than 30 Days Ago' exists
 - Update phone numbers in the [Communication Preference Portal](#) (REQUIRED)
 - NO MATCH = COR must provide **ONE** of the following
 - Preferred method(s)
 - Account Number
 - Service Agreement ID (SA ID)
 - SSN/TIN (last 4 digits) or Valid ID
 - Alternate if unable to provide ANY of the above
 - Last payment amount - MUST be the EXACT amount
 - If transferring or consulting with another internal CCO Department (i.e. SSR, Solar, Business, etc.) - [CSR Transfer Guidelines](#)
 - Update the AccNum field in Finesse
 - Update IVR Authenticated field to BY CSR
3. Upon authentication of the COR
 - No restrictions on information or transactions

- Exception: Not financially responsible COR CANNOT request the following
 - Rate Change
 - Remote connect
 - **SmartMeter** Opt Out Enrollment / Unenrollment

[back to top](#)

Finesse Indicator: TRUE

Note: If there is a password on the account, the [Password](#) must be provided

- Main Customer of Record (MCOR) may provide Password or Security answer
 - All other CORs or authorized 3rd party can only provide Password
 - Don't ask a COR or authorized 3rd party the security question
- [Password Cannot be Provided](#)
 - Don't provide the existing password or security answer even after authenticated

Reminders: Required to update contact information accordingly if the alert 'Contact Information Last Confirmed More Than 30 Days Ago' exists

- **Always** ask the caller to provide this information
 - After authentication of the COR, the entire phone number in the Communication Preference Portal can be shared so they can be appropriately updated
- **Do not** automatically add the phone number from the phone console to the account

TRUE Finesse process

1. Verify caller's name matches COR account name
 - COR MATCH - Go to next step
 - Last name provided does not match
 - Verify first name and confirm it matches
 - Ask for account number or last 4 digits of SSN/TIN to authenticate
 - Follow process [Alias or Updating Name](#) to correct last name
 - [Non COR authentication process](#)
2. **On all authenticated accounts:** Check for Alert - Contact Information Last Confirmed More Than 30 Days Ago
 - Update phone numbers in the [Communication Preference Portal](#) (REQUIRED)
 - If receiving a transferred call and a 7 digit CSR extension is displayed in Finesse
 - Remember, when transferring or consulting: Populate the AccNum fields in Finesse before transferring - [CSR Transfer Guidelines](#)
 - If transferring or consulting with another internal CCO Department (i.e. SSR, Solar, Business, etc.)- [CSR Transfer Guidelines](#)
 - Update the AccNum field in Finesse
 - Update IVR Authenticated field to BY CSR
3. Upon authentication of the COR
 - No restrictions on information or transactions
 - Exception: Not financially responsible COR CANNOT request the following
 - Rate Change
 - Remote connect
 - **SmartMeter** Opt Out Enrollment / Unenrollment

[back to top](#)

No SSN / TIN / ID on account

Note: If there is a password on the account, the [Password](#) must be provided

- Main Customer of Record (MCOR) may provide Password or Security answer
 - All other CORs or authorized 3rd party can only provide Password
 - Don't ask a COR or authorized 3rd party the security question
- [Password Cannot be Provided](#)
 - Don't provide the existing password or security answer even after authenticated

If there is another COR on the account and the caller can provide their SSN / TIN / ID

- Proceed with the call - the customer has been authenticated
- [Update COR identification information](#) (if available)

[back to top](#)

Unable to authenticate COR

- Provide no information
 - Inform caller you are unable to release any account information since they are unable to be authenticated
- Don't create a Fraud Customer Contact

[back to top](#)

When a call is transferred to an SSR

SSR checks Finesse Authentication Status

- Authentication Status = TRUE or CSR
 - No need to update contact information in [Communication Preference Portal](#)
- Authentication Status = FALSE
 - **On all authenticated accounts:** Check for Alert - Contact Information Last Confirmed More Than 30 Days Ago
 - Ask customer for best contact number(s) and update [Communication Preference Portal](#)

[back to top](#)

ARTICLE FEEDBACK

[Send Us Feedback](#)

LAST MODIFIED DATE

7/8/2020 2:11 PM

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 028-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 028-Q01		
Request Date:	August 14, 2020	Requester DR No.:	028
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

SUBJECT: DATA REQUEST ON THE OCTOBER 2019 DE-ENERGIZATION (PSPS EVENTS) IN RELATION TO THE RULING DIRECTING PG&E TO SHOW CAUSE WHY IT SHOULD NOT BE SANCTIONED BY THE COMMISSION FOR VIOLATION OF PUBLIC UTILITIES CODE SECTIONS 451, COMMISSION DECISION 19-05-042 AND RESOLUTION ESRB-8

QUESTION 01

In response to data request CalAdvocates-PGE-R1812005-OSC-15 in this OSC (or, simply, CalAdvocates-024 in the general Rulemaking 18-12-005), PG&E states that:

The following table provides the counts of the Account IDs of public safety partners/priority notice entities with service points impacted during an event, such as police, fire, telecom providers, water agencies, emergency hospitals that did not receive 48-78 hour automated advanced notifications via PG&E's customer notification system. As described in event reports, **many of these entities also received personal emails, phone calls from their account representatives (such as for water agencies and hospitals), and/or by staff in the EOC [Emergency Operation Center]**, including the Critical Infrastructure Lead (CIL) who coordinates with Communications providers, and/or by operators from PG&E's Grid Control Center (GCC) who coordinates with transmission level customers. Additionally, some of these entities may have received automated notifications via PG&E's agency notifications as described above.³ (Emphasis Added.)

Please fill in the following table regarding advance notification:

³ PG&E's response to data request CalAdvocates-PGE-R1812005-OSC-15 or CalAdvocates-024, Question 1, pp. 3 to 4.

TABLE 1: PUBLIC SAFETY PARTNERS/PRIORITY NOTIFICATION ENTITIES (IN TERMS OF THE NUMBER OF CUSTOMER ACCOUNTS)

Number of Customer Accounts	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
<p>Number of <i>customer accounts</i> of public safety partners/priority notification entities who received <u>ANY</u> of the following as “advance notification” between 48 to 72 hours before the de-energization event started:</p> <ul style="list-style-type: none"> – Automated notification, – Personal emails, – phone calls from their account representatives (such as for water agencies and hospitals), OR – phone calls, texts or emails from staff in the Emergency Operation Center. 			
<p>Among the number of <i>customer accounts</i> of public safety partners/priority notification entities from the above row in this table, number of <i>customer accounts</i> of public safety partners who received <u>ANY</u> of the following as “advance notification” between 1 to 48 hours before the de-energization event started:</p> <ul style="list-style-type: none"> – Automated notification, – Personal emails, – phone calls from their account representatives (such as for water agencies and hospitals), OR – - phone calls, texts or emails from staff in the Emergency Operation Center. 			

ANSWER 01

PG&E objects to this data request as unduly burdensome, because the request to identify the number of public safety partners who were personally notified by account representatives or staff in the EOC would require PG&E to expend significant resources to review a large volume of additional data.

Subject to and without waiving this objection, PG&E responds as follows: Please see the response to CalAdvocates-PGE-R1812005-OSC-21, Question 2 (sent by Cal Advocates as OSC-12) submitted on July 24, 2020, for the number of public safety partners who were provided advanced notification by automated notification. Further, personal notifications provided to public safety partners were usually supplemental and in addition to automatic notifications.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 028-Q02		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 028-Q02		
Request Date:	August 14, 2020	Requester DR No.:	028
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

SUBJECT: DATA REQUEST ON THE OCTOBER 2019 DE-ENERGIZATION (PSPS EVENTS) IN RELATION TO THE RULING DIRECTING PG&E TO SHOW CAUSE WHY IT SHOULD NOT BE SANCTIONED BY THE COMMISSION FOR VIOLATION OF PUBLIC UTILITIES CODE SECTIONS 451, COMMISSION DECISION 19-05-042 AND RESOLUTION ESRB-8

QUESTION 02

Please provide the following figures regarding all customers (other than public safety partners / priorities notification entities):

TABLE 2: MISSING ADVANCE NOTIFICATION FOR ALL CUSTOMERS OTHER THAN PUBLIC SAFETY PARTNERS / PRIORITIES NOTIFICATION ENTITIES

	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
Number of Customer Accounts			
Among the number of all customers (other than public safety partners / priorities notification entities) who did not receive 1- to 48-hour “advanced notification”, number of customer accounts of these customers who only received notification within one hour before the start of the de-energization event			
Number of customer accounts of all customers (other than public safety partners / priorities notification entities) who did NOT any receive “advance notification” within 48 hours of the start of the de-energization event			

ANSWER 02

PG&E is providing responses by Service Point ID (SPID).

Number of SPIDs ³	October 9 to 12, 2019 De- Energization Event	October 23 to 25, 2019 De- Energization Event	October 26 to November 1, 2019 De- Energization Event
Among the number of all customers (other than public safety partners / priorities notification entities) who did not receive 1- to 48-hour “advanced notification”, number of SPIDs of these customers who only received notification within one hour before the start of the de-energization event	0	0	0
Number of SPIDs of all customers (other than public safety partners / priorities notification entities) who did NOT any receive “advance notification” within 48 hours of the start of the de-energization event	23,382	2,005	39,340

³ PG&E’s responses for customer counts as requested by different types, segments, or designations reflect PG&E’s customers of record and their designations as of May 2020. These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 028-Q03		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 028-Q03		
Request Date:	August 14, 2020	Requester DR No.:	028
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

SUBJECT: DATA REQUEST ON THE OCTOBER 2019 DE-ENERGIZATION (PSPS EVENTS) IN RELATION TO THE RULING DIRECTING PG&E TO SHOW CAUSE WHY IT SHOULD NOT BE SANCTIONED BY THE COMMISSION FOR VIOLATION OF PUBLIC UTILITIES CODE SECTIONS 451, COMMISSION DECISION 19-05-042 AND RESOLUTION ESRB-8

QUESTION 03

Please provide the following figures regarding Medical Baseline Customers:

TABLE 2: MISSING ADVANCE NOTIFICATION FOR MEDICAL BASELINE CUSTOMERS

Number of Customer Accounts	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
Number of customer accounts of medical baseline customers who did NOT receive 24- to 48-hour “advanced notification”			
Among the number of medical baseline customers who did not receive 24- to 48-hour “advanced notification”, please provide the number of customer accounts for customers who received 1- to 24-hour advanced notification			
Among the number of medical baseline customers who did not receive 1- to 48-hour “advanced notification”, please provide the number of customer accounts for customers who received notification only within one hour of the start of the de-energization event			
Number of customer accounts of medical baseline customers who did not receive “advance notification” anytime up to 48 hours before the start of the de-energization event (i.e. customers who did not receive any advance notification in the 48 hours leading up to the de-energization event)			

ANSWER 03

PG&E is providing responses by Service Point ID (SPID).

Number of SPIDs ³	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
Number of SPIDs of medical baseline customers who did NOT receive 24- to 48-hour “advanced notification”	5,594	206	8,307 ⁴
Among the number of medical baseline customers who did not receive 24- to 48-hour “advanced notification”, please provide the number of SPIDs for customers who received 1- to 24-hour advanced notification	5,006	184	7,690
Among the number of medical baseline customers who did not receive 1- to 48-hour “advanced notification”, please provide the number of SPIDs for customers who received notification <u>only within one hour of the start</u> of the de-energization event	0	0	0
Number of SPIDs of medical baseline customers who did not receive “advance notification” <u>anytime up to 48 hours</u> before the start of the de-energization event (i.e. customers who did not receive any advance notification in the 48 hours leading up to the de-energization event)	588	22	617 ⁴

³ These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

⁴ Note, in some instances, a customer may be both a medical baseline customer and a Critical Facility (e.g., hospice facility is residential on MBL rate that is also Critical Facility per CPUC Definition). The customer(s) are reflected in the counts of both designations (medical baseline and Critical Facility). For this instance, there is 1 SPID designated as both.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 028-Q04		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 028-Q04		
Request Date:	August 14, 2020	Requester DR No.:	028
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

SUBJECT: DATA REQUEST ON THE OCTOBER 2019 DE-ENERGIZATION (PSPS EVENTS) IN RELATION TO THE RULING DIRECTING PG&E TO SHOW CAUSE WHY IT SHOULD NOT BE SANCTIONED BY THE COMMISSION FOR VIOLATION OF PUBLIC UTILITIES CODE SECTIONS 451, COMMISSION DECISION 19-05-042 AND RESOLUTION ESRB-8

QUESTION 04

Please provide the following figures regarding critical facilities:

TABLE 3: MISSING ADVANCE NOTIFICATION FOR CRITICAL FACILITIES

Number of Customer Accounts	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
Number of customer accounts of critical facilities who did NOT receive 48- to 72-hour advanced notification			
Among the number of customer accounts of critical facilities who did NOT receive 48- to 72-hour “advanced notification”, please provide the number of customer accounts for customers who received 1- to 48-hour “advanced notification”			
Among the number of critical facilities who did not receive 1- to 72-hour “advanced notification”, number of customer accounts for customers who received notification only within one hour of the start of the de-energization event			
Number of customer accounts of critical facilities who did NOT receive advance notification anytime up to 72 hours before the start of the de-energization event (i.e. critical facilities customers who did not receive any advance notification in the 72 hours leading up to the de-energization event)			

ANSWER 04

PG&E is providing responses by Service Point ID (SPID).

Number of SPIDs ³	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
Number of SPIDs of critical facilities who did NOT receive 48- to 72-hour advanced notification	2,353 ⁴	767	1,989
Among the number of SPIDs of critical facilities who did NOT receive 48- to 72-hour “advanced notification”, please provide the number of SPIDs for customers who received 1- to 48-hour “advanced notification”	2,291 ⁴	761	1,906
Among the number of critical facilities who did not receive 1- to 72-hour “advanced notification”, number of SPIDs for customers who received notification <u>only</u> within one hour of the start of the de-energization event	0	0	0
Number of SPIDs of critical facilities who did NOT receive advance notification <u>anytime up to 72 hours</u> before the start of the de-energization event (i.e. critical facilities customers who did not receive any advance notification in the 72 hours leading up to the de-energization event)	62	6	83

³ PG&E’s responses for customer counts as requested by different types, segments, or designations reflect PG&E’s customers of record and their designations as of May 2020. These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

⁴ Note, in some instances, a customer may be both a medical baseline customer and a Critical Facility (e.g., hospice facility is residential on MBL rate that is also Critical Facility per CPUC Definition). The customer(s) are reflected in the counts of both designations (medical baseline and Critical Facility). For this instance, there is 1 SPID are designated as both

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 028-Q02Rev01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 028-Q02Rev01		
Request Date:	August 14, 2020	Requester DR No.:	028
Date Sent:	August 28, 2020 Revised September 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

SUBJECT: DATA REQUEST ON THE OCTOBER 2019 DE-ENERGIZATION (PSPS EVENTS) IN RELATION TO THE RULING DIRECTING PG&E TO SHOW CAUSE WHY IT SHOULD NOT BE SANCTIONED BY THE COMMISSION FOR VIOLATION OF PUBLIC UTILITIES CODE SECTIONS 451, COMMISSION DECISION 19-05-042 AND RESOLUTION ESRB-8

QUESTION 02

Please provide the following figures regarding all customers (other than public safety partners / priorities notification entities):

TABLE 2: MISSING ADVANCE NOTIFICATION FOR ALL CUSTOMERS OTHER THAN PUBLIC SAFETY PARTNERS / PRIORITIES NOTIFICATION ENTITIES

	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
Number of Customer Accounts			
Among the number of all customers (other than public safety partners / priorities notification entities) who did not receive 1- to 48-hour “advanced notification”, number of customer accounts of these customers who only received notification within one hour before the start of the de-energization event			
Number of customer accounts of all customers (other than public safety partners / priorities notification entities) who did NOT any receive “advance notification” within 48 hours of the start of the de-energization event			

ANSWER 02 REVISED 01

PG&E is amending its previous response to Question 2 to update the numbers to align with the list of Critical Facilities/Public Safety Partners as of May 2020. In its prior response to this request, PG&E had used an earlier-dated list of Critical Facilities/Public Safety Partners, which was not identical to the May 2020 list used to respond to other data requests. The purpose of this amendment is to ensure consistency across the data responses by using a single list of Critical Facilities/Public Safety Partners from May 2020.

The number of customers and public safety partners notified during each time range in the minimum notification timeline depends on the known scope of the event at that point in time. The scope of the event may change in the time leading up to the event due to changes in the weather forecast and footprint, among other reasons. As the event approaches, the event scope becomes more certain and PG&E may identify and notify additional customers that were not previously identified as within the event scope during earlier timeframes. This context applies to the delivery of advance notifications according to the minimum notification timeline; please see Chapter 3 of PG&E's Opening Testimony for the reasons why some customers may have received no direct notification prior to de-energization.

Number of SPIDs ³	October 9 to 12, 2019 De- Energization Event	October 23 to 25, 2019 De- Energization Event	October 26 to November 1, 2019 De- Energization Event
Among the number of all customers (other than public safety partners / priorities notification entities) who did not receive 1- to 48-hour "advanced notification", number of SPIDs of these customers who only received notification within one hour before the start of the de-energization Event	0	0	300
Number of SPIDs of all customers (other than public safety partners / priorities notification entities) who did NOT any receive "advance notification" within 48 hours of the start of the de-energization event	23,341	1,994	39,310

³ PG&E's responses for customer counts as requested by different types, segments, or designations reflect PG&E's customers of record and their designations as of May 2020. These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 028-Q03Rev01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 028-Q03Rev01		
Request Date:	August 14, 2020	Requester DR No.:	028
Date Sent:	August 28, 2020 Revised September 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

SUBJECT: DATA REQUEST ON THE OCTOBER 2019 DE-ENERGIZATION (PSPS EVENTS) IN RELATION TO THE RULING DIRECTING PG&E TO SHOW CAUSE WHY IT SHOULD NOT BE SANCTIONED BY THE COMMISSION FOR VIOLATION OF PUBLIC UTILITIES CODE SECTIONS 451, COMMISSION DECISION 19-05-042 AND RESOLUTION ESRB-8

QUESTION 03

Please provide the following figures regarding Medical Baseline Customers:

TABLE 2: MISSING ADVANCE NOTIFICATION FOR MEDICAL BASELINE CUSTOMERS

Number of Customer Accounts	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
Number of customer accounts of medical baseline customers who did NOT receive 24- to 48-hour “advanced notification”			
Among the number of medical baseline customers who did not receive 24- to 48-hour “advanced notification”, please provide the number of customer accounts for customers who received 1- to 24-hour advanced notification			
Among the number of medical baseline customers who did not receive 1- to 48-hour “advanced notification”, please provide the number of customer accounts for customers who received notification only within one hour of the start of the de-energization event			
Number of customer accounts of medical baseline customers who did not receive “advance notification” anytime up to 48 hours before the start of the de-energization event (i.e. customers who did not receive any advance notification in the 48 hours leading up to the de-energization event)			

ANSWER 03 REVISED 01

PG&E is amending its previous response to Question 3 to update three of its numbers for the October 26—November 1 event to align with PG&E's notification timeframe table below. For example, in the original response, PG&E's count of customers notified in the "24- to 48-hour" window included customers notified between 24 and 48 hours prior to de-energization, but with this update, the count of customers notified in the "24- to 48-hour" window only includes customers notified between 24 and 47.99 hours before de-energization. The update changes the category for a minority of customers that fell exactly on the hour. Please see the three updated numbers in redline in the table. The purpose of this amendment is to ensure consistency across the data responses by using a single list of Critical Facilities/Public Safety Partners from May 2020.

Notification Windows	Notification Timeframes
48 to 72	Notifications from 48 hours to 72.99 hours
24 to 48	Notifications from 24 hours to 47.99 hours
1 to 48	Notifications from 1 hours to 47.99 hours
1 to 24	Notifications from 1 hours to 23.99 hours
under 1	Notifications from 0 hours to 0.99 hours

The number of customers notified during each time range in the minimum notification timeline depends on the known scope of the event at that point in time. The scope of the event may change in the time leading up to the event due to changes in the weather forecast and footprint, among other reasons. As the event approaches, the event scope becomes more certain and PG&E may identify and notify additional customers that were not previously identified as within the event scope during earlier timeframes. This context applies to the delivery of advance notifications according to the minimum notification timeline; please see Chapter 3 of PG&E's Opening Testimony for the reasons why some customers may have received no direct notification prior to de-energization.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 028-Q04		
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PG&E Witness:		Requester:	Pui-Wa Li

SUBJECT: DATA REQUEST ON THE OCTOBER 2019 DE-ENERGIZATION (PSPS EVENTS) IN RELATION TO THE RULING DIRECTING PG&E TO SHOW CAUSE WHY IT SHOULD NOT BE SANCTIONED BY THE COMMISSION FOR VIOLATION OF PUBLIC UTILITIES CODE SECTIONS 451, COMMISSION DECISION 19-05-042 AND RESOLUTION ESRB-8

QUESTION 04

Please provide the following figures regarding critical facilities:

TABLE 3: MISSING ADVANCE NOTIFICATION FOR CRITICAL FACILITIES

Number of Customer Accounts	October 9 to 12, 2019 De-Energization Event	October 23 to 25, 2019 De-Energization Event	October 26 to November 1, 2019 De-Energization Event
Number of customer accounts of critical facilities who did NOT receive 48- to 72-hour advanced notification			
Among the number of customer accounts of critical facilities who did NOT receive 48- to 72-hour “advanced notification”, please provide the number of customer accounts for customers who received 1- to 48-hour “advanced notification”			
Among the number of critical facilities who did not receive 1- to 72-hour “advanced notification”, number of customer accounts for customers who received notification only within one hour of the start of the de-energization event			
Number of customer accounts of critical facilities who did NOT receive advance notification anytime up to 72 hours before the start of the de-energization event (i.e. critical facilities customers who did not receive any advance notification in the 72 hours leading up to the de-energization event)			

ANSWER 04 REVISED 01

PG&E is amending its previous response to Question 4 to update the numbers to align with the list of Critical Facilities/Public Safety Partners as of May 2020. In its prior response to this request, PG&E had used an earlier-dated list of Critical Facilities/Public Safety Partners, which was not identical to the May 2020 list used to respond to other data requests. The purpose of this amendment is to ensure consistency across the data responses by using a single list of Critical Facilities/Public Safety Partners from May 2020.

The number of customers and Public Safety Partners notified during each time range in the minimum notification timeline depends on the known scope of the event at that point in time. The scope of the event may change in the time leading up to the event due to changes in the weather forecast and footprint, among other reasons. As the event approaches, the event scope becomes more certain and PG&E may identify and notify additional customers that were not previously identified as within the event scope during earlier timeframes. This context applies to the delivery of advance notifications according to the minimum notification timeline; please see Chapter 3 of PG&E's Opening Testimony for the reasons why some customers may have received no direct notification prior to de-energization.

Number of SPIDs ³	October 9 to 12, 2019 De- Energization Event	October 23 to 25, 2019 De- Energization Event	October 26 to November 1, 2019 De- Energization Event
Number of SPIDs of critical facilities who did NOT receive 48- to 72-hour advanced notification	3,450	1,121	3,058
Among the number of SPIDs of critical facilities who did NOT receive 48- to 72-hour "advanced notification", please provide the number of SPIDs for customers who received 1- to 48-hour "advanced notification"	3,347	1,104	2,954
Among the number of critical facilities who did not receive 1- to 72-hour "advanced notification", number of SPIDs for customers who received notification only within one hour of the start of the de-energization event	0	0	0

³ PG&E's responses for customer counts as requested by different types, segments, or designations reflect PG&E's customers of record and their designations as of May 2020. These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

Number of SPIDs of critical facilities who did NOT receive advance notification anytime up to 72 hours before the start of the de-energization event (i.e. critical facilities customers who did not receive any advance notification in the 72 hours leading up to the de- energization event)	103	17	104
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PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

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PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 029-Q01		
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PG&E Witness:		Requester:	Pui-Wa Li

PG&E's Customers Who Missed Advance Notification in More Than One October 2019 De- Energization Event

QUESTION 01

For the three PG&E October 2019 de-energization events,¹ please refer to the Excel Spreadsheet *PubAdv-PGE-OSC-DR-20_Attch01.xlsx* attached to this data question and fill in column B of Tables 1 to 4. The description of these tables is as follow:

- **Table 1:** The number of customer accounts who missed advance notification in BOTH the October 9 to 12, 2019 and the October 23 to 25 de-energization events;
- **Table 2:** The breakdown of the customer accounts from Table 1, by customer class;
- **Table 3:** The number of public safety partners² / priorities notification entities³ / critical facilities among the customer accounts from Table 1;
- **Table 4:** The number of customer accounts who missed advance notifications in more than one of the three de-energization events within the scope of this OSC. **Please note that each row in Table 4 is a mutually exclusive category.**

ANSWER 01

Please see *De-EnergizePowerLines_DR_CalAdvocates_029-Q01Atch01.xlsx* for the requested information.

-
- ¹ The three de-energization events within the scope of this OSC are the October 9 to 12, 2019 de-energization event, the October 23 to 25, 2019 de-energization event, and the October 26 to November 1, 2019 de- energization event.
 - ² See definition on page 4 of data request. See also, D.19-05-042, p. A4, which provides the definition of “public safety partners.”
 - ³ D.19-05-042, Appendix A, De-Energization Guideline, p. A7, which states that “The Commission’s adopted definition of public safety partners does not include critical facilities and infrastructure beyond water utilities and communication providers. The utility may, in partnership with first/emergency responders and/or local government entities, identify other critical facilities that should receive priority notice. This guideline is intended to set a floor, not a ceiling for priority notification.”

PG&E is providing responses to this question by Service Point ID (SPID).

For Table 2, PG&E's customer type field for PSPS reporting uses a single, combined designation of commercial/industrial customers, and therefore data for commercial/industrial customers cannot be broken out separately into "commercial" and "industrial" categories, as requested. Additionally, PG&E's combined reporting of industrial and commercial customers in the context of PSPS aligns with ESRB-8 requirements to report the number of affected customers, by residential, medical baseline, commercial/industrial, and other.

Additional notes regarding this data include:

- PG&E's responses for customer counts as requested by different types, segments, or designations reflect PG&E's customers of record and their designations as of May 2020. Regarding the mutually exclusive nature of Public Safety Partners, priority notification entities, and critical facilities that are neither Public Safety Partners nor priority notification entities in Table 4, PG&E has used definitions in Appendix A of D.19-05-042 for the response provided, as described below.
- All Service Point IDs (SPIDs) who are identified as Public Safety Partners are also critical facilities.
- Priority notification entities are defined in D.19-05-042 p.A7 as follows:

"The Commission's adopted definition of public safety partners does not include critical facilities and infrastructure beyond water utilities and communication providers. The utility may, in partnership with first/emergency responders and/or local government entities, identify other critical facilities that should receive priority notice. This guideline is intended to set a floor, not a ceiling for priority notification."
- As described in response De-EnergizePowerLines_DR_CalAdvocates_022-Q02, PG&E includes emergency hospital services as a priority notice entity, however, their designations in the data are incorporated into PG&E's response to Public Safety Partners based on the expanded definition of Public Safety Partner that includes first responder/emergency responder, which is defined in D.19-05-042 (pg. A4) to include, among others, "emergency medical services providers (including hospital emergency facilities)". Emphasis added. Therefore, questions regarding priority notification entities are answered with "N/A".
- PG&E notes that its automated notification launch sequence in 2019 notified other non- Public Safety Partner critical facilities before general customers; however, PG&E did not formally identify these other non-Public Safety Partner critical facilities as priority notice entities. The notification launch sequence to the other non-Public Safety Partner critical facilities was a function of pre-existing customer database designations created prior to the PSPS program, not a

function of identifying and agreeing to additional specific critical facilities in partnership with first/emergency responders and/or local government entities. Therefore, some customers in the numbers identified include Critical Facilities that are not part of the Commission's adopted definition of Public Safety Partners.

- Because some Public Safety Partners that are also agencies are not notified based on their customer account records, the data reported represents notifications to PG&E's customers of record with SPIDs and does not represent the automated Public Safety Partner notifications sent to agencies via PG&E's agency notification system, as described in the following data response provided on July 24, 2020: De-EnergizePowerLines_DR_CalAdvocates_021 Question 2.

Table No.	Description of Table
<u>Table 1</u>	The Number of Customer Accounts Who Missed Advance Notification in BOTH the October 9 to 12, 2019 and the October 23 to 25 De-Energization Events
<u>Table 2</u>	The Breakdown of the Customer Accounts from Table 1, by Customer Class
<u>Table 3</u>	The Number of Critical Facilities among the Customer Accounts from Table 1
<u>Table 4</u>	The Number of Customer Accounts Who Missed Advanced Notification in the October 9 to 12, 2019 De-energization Event OR October 23 to 25, 2019 De-energization Event
<u>Table 5</u>	The Number of Public Safety Partners Who Lost Access to PG&E's Secure Data Transfer Portal in the October 9 to 12, 2019 De-Energization Event

Table 2: The Breakdown of the Customer Accounts from [Table 1](#), by Customer Class

Number of Customer Accounts from Table 1 , by Customer Class	Number of Customer Accounts
	22
OT consolidate this figure with the number of industrial	185
OT consolidate this figure with the number of (customers)	N/A [2]
	1566
ate Government	0
er of Customer Accounts	1773

Table 3: The Number of Critical Facilities among the Customer Accounts from [Table 1](#)

the Number of Customer Accounts from Table 1 , by Type	Number of Customer Accounts
customer accounts who are Public safety partners OT consolidate this figure with the number of priority (entities)	16 [2]
public safety partners identified in the row right number of customer accounts which are ALSO critical	16 [2]
customer accounts who are priority notification entities OT consolidate this figure with the number of public (rs)	N/A [3] [4]
priority notification entities [1] identified in the row the number of customer accounts which are ALSO ities	N/A [3] [4]

Commission’s adopted definition of public safety partners does not include critical facilities and infrastructure
r utilities and communication providers. The utility may, in partnership with first/emergency responders
government entities, identify other critical facilities that should receive priority notice. This guideline is
et a floor, not a ceiling for priority notification

Table 4: The number of customer accounts who missed advance notifications in more than one of the three de-energization events within the scope of this OSC. Please note that each row in Table 4 is a mutually exclusive category.

*Please note that PG&E is prov

Description	<u>Total</u> Number of Customer Accounts
The number of customer accounts who did not receive advance notification in the 1st <u>and</u> 2nd events	1773
The number of customer accounts who did not receive advance notification in the 1st <u>and</u> 3rd events	8351
The number of customer accounts who did not receive advance notification in the 2nd <u>and</u> 3rd events	1826
The number of customer accounts who did not receive advance notification in ALL three events (i.e., the 1st, 2nd, <u>and</u> 3rd events)	1664

Footnotes:

[1] “1st event” as used herein refers to the PG&E October 9 to 12, 2019 de-energization event.

[2] “2nd event” as used herein refers to the PG&E October 23 to 25, 2019 de-energization event.

[3] “3rd event” as used herein refers to the PG&E October 26 to November 1, 2019 de-energization event.

Table 5: The Number of Public Safety Partners Who Lost Access to PG&E’s Secure Data Transfer Portal in the October 9 to 12, 2019 De-Energization Event

Description	Number of Public Safety Partners (in terms of the number of customer accounts)
Number of hours when PG&E's secure data portal was unavailable during the October 9 to 12, 2019 de-energization event	N/A [1]
Number of hours when PG&E's secure data portal was unavailable through PG&E's website during the October 9 to 12, 2019 de-energization event	N/A [1]
Number of customer accounts who are public safety partners who LOST access to PG&E’s secure data transfer portal during the October 9 to 12, 2019 de-energization event	N/A [1]

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

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Request Date:	August 14, 2020	Requester DR No.:	029
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PG&E Witness:		Requester:	Pui-Wa Li

**PG&E's Customers Who Missed Advance Notification in More Than One
October 2019 De- Energization Event**

QUESTION 02

Please fill in column B of Table 5 in the Excel Spreadsheet *PubAdv-PGE-OSC-DR-20_Attch01.xlsx* attached to this data question. The description of the table is as follow:

- **Table 5:** The number of public safety partners who lost access to PG&E's secure data transfer portal in the October 9 to 12, 2019 de- energization event.

ANSWER 02

PG&E objects to this data request on the grounds that it assumes facts not in evidence, namely that Public Safety Partners “lost access” to PG&E’s secure data transfer portal during the October 9–12 event. As described in PG&E’s OSC Opening Testimony, pp. 4-15 through 4-18, PG&E has not discovered any evidence of an outage that rendered the secure data transfer portal inaccessible to Public Safety Partners.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 029-Q03		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 029-Q03		
Request Date:	August 14, 2020	Requester DR No.:	029
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

**PG&E's Customers Who Missed Advance Notification in More Than One
October 2019 De- Energization Event**

QUESTION 03

Please describe other¹ corrective actions PG&E took and **completed** to prevent public safety partners from losing access to PG&E's secure transfer **portal through the PG&E's website after** the October 9 to 12, 2019 de-energization event:

- a) **Before** the October 23 to 25, 2019 de-energization event, and
- b) **Before** the October 26 to November 1, 2019 de-energization event.

ANSWER 03

PG&E objects to this data request on the grounds that it assumes facts not in evidence, namely that Public Safety Partners "los[t] access" to PG&E's secure data transfer portal during the October 9–12 event if they attempted to use the PGE.com web address rather than the direct ESFT web address to reach the portal. As described in PG&E's OSC Opening Testimony, pp. 4-15 through 4-18, PG&E has not discovered any evidence of an outage that rendered the secure data transfer portal inaccessible to Public Safety Partners.

Subject to and without waiving this objection, PG&E responds as follows: Please see page 15 of PG&E's post-event ESRB-8 report for the October 23–25 event and PG&E's OSC Opening Testimony, pp. 4-11 through 4-14, which describe PG&E's efforts to reinforce and stabilize its website after the October 9–12 event.

¹ Other corrective actions refers to those action PG&E took aside from and in addition to using the direct web address for the secure transfer portal.

**PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response**

PG&E Data Request No.:	CalAdvocates 029-Q04		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 029-Q04		
Request Date:	August 14, 2020	Requester DR No.:	029
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

**PG&E's Customers Who Missed Advance Notification in More Than One
October 2019 De- Energization Event**

QUESTION 04

As of October 9, 2019,

- a) What were the means that public safety partners used to gain access to PG&E's secure transfer portal?
- b) Have these means that public safety partners used to gain access to PG&E's secure transfer portal changed since October 12, 2019? If so, how?

ANSWER 04

- a) Please see PG&E's OSC Opening Testimony, pp. 4-15 through 4-16, which explains the ways in which Public Safety Partners could access information stored on PG&E's secure data transfer portal.
- b) For the 2020 wildfire season, Public Safety Partners can continue to access information stored on PG&E's secure data transfer portal at <https://pge.com/pspsportal>, as stated in PG&E's OSC Opening Testimony, p. 4-15. In 2020, Public Safety Partners can also access the secure data transfer portal at <https://pspsportal.pge.com/>.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 029-Q05		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 029-Q05		
Request Date:	August 14, 2020	Requester DR No.:	029
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

**PG&E's Customers Who Missed Advance Notification in More Than One
October 2019 De- Energization Event**

QUESTION 05

Please explain why it is **NOT** PG&E's responsibility to ensure that Public Safety Partners do not lose access to the portal before, during, **and** after any of the three October 2019 de- energization events. Please cite specific laws, Commission decisions, rulings, General Orders, or other authorities that support your position.

ANSWER 05

PG&E objects to this data request on the grounds that it assumes facts not in evidence, namely that Public Safety Partners "los[t] access" to PG&E's secure data transfer portal. As described in PG&E's OSC Opening Testimony, pp. 4-15 through 4-18, PG&E has not discovered any evidence of an outage that rendered the secure data transfer portal inaccessible to public safety partners. Subject to and without waiving this objection, PG&E believes that any requirements to make information available to Public Safety Partners through a secure data transfer portal are explained in the Commission's decisions and rulings, including the De-Energization Guidelines appended to D.19-05-042.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 029-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 029-Q01Rev01		
Request Date:	August 14, 2020	Requester DR No.:	029
Date Sent:	August 28, 2020 Revised August 31, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

PG&E's Customers Who Missed Advance Notification in More Than One October 2019 De- Energization Event

QUESTION 01

For the three PG&E October 2019 de-energization events,¹ please refer to the Excel Spreadsheet *PubAdv-PGE-OSC-DR-20_Attch01.xlsx* attached to this data question and fill in column B of Tables 1 to 4. The description of these tables is as follow:

- **Table 1:** The number of customer accounts who missed advance notification in BOTH the October 9 to 12, 2019 and the October 23 to 25 de-energization events;
- **Table 2:** The breakdown of the customer accounts from Table 1, by customer class;
- **Table 3:** The number of public safety partners² / priorities notification entities³ / critical facilities among the customer accounts from Table 1;
- **Table 4:** The number of customer accounts who missed advance notifications in more than one of the three de-energization events within the scope of this OSC. **Please note that each row in Table 4 is a mutually exclusive category.**

¹ The three de-energization events within the scope of this OSC are the October 9 to 12, 2019 de-energization event, the October 23 to 25, 2019 de-energization event, and the October 26 to November 1, 2019 de- energization event.

² See definition on page 4 of data request. See also, D.19-05-042, p. A4, which provides the definition of "public safety partners."

³ D.19-05-042, Appendix A, De-Energization Guideline, p. A7, which states that "The Commission's adopted definition of public safety partners does not include critical facilities and infrastructure beyond water utilities and communication providers. The utility may, in partnership with first/emergency responders and/or local government entities, identify other critical facilities that should receive priority notice. This guideline is intended to set a floor, not a ceiling for priority notification."

ANSWER 01 REVISED 01

Please see *De-EnergizePowerLines_DR_CalAdvocates_029-Q01Rev01Atch01.xlsx*⁴ for the requested information.

PG&E is providing responses to this question by Service Point ID (SPID).

For Table 2, PG&E's customer type field for PSPS reporting uses a single, combined designation of commercial/industrial customers, and therefore data for commercial/industrial customers cannot be broken out separately into "commercial" and "industrial" categories, as requested. Additionally, PG&E's combined reporting of industrial and commercial customers in the context of PSPS aligns with ESRB-8 requirements to report the number of affected customers, by residential, medical baseline, commercial/industrial, and other.

Additional notes regarding this data include:

- PG&E's responses for customer counts as requested by different types, segments, or designations reflect PG&E's customers of record and their designations as of May 2020. Regarding the mutually exclusive nature of Public Safety Partners, priority notification entities, and critical facilities that are neither Public Safety Partners nor priority notification entities in Table 4, PG&E has used definitions in Appendix A of D.19-05-042 for the response provided, as described below.
- All Service Point IDs (SPIDs) who are identified as Public Safety Partners are also critical facilities.
- Priority notification entities are defined in D.19-05-042 p.A7 as follows:

"The Commission's adopted definition of public safety partners does not include critical facilities and infrastructure beyond water utilities and communication providers. The utility may, in partnership with first/emergency responders and/or local government entities, identify other critical facilities that should receive priority notice. This guideline is intended to set a floor, not a ceiling for priority notification."
- As described in response *De-EnergizePowerLines_DR_CalAdvocates_022-Q02*, PG&E includes emergency hospital services as a priority notice entity, however, their designations in the data are incorporated into PG&E's response to Public Safety Partners based on the expanded definition of Public Safety Partner that includes first responder/emergency responder, which is defined in D.19-05-042 (pg. A4) to include, among others, "emergency medical services providers (including hospital emergency facilities)". Emphasis added. Therefore, questions regarding priority notification entities are answered with "N/A".

⁴ These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

- PG&E notes that its automated notification launch sequence in 2019 notified other non- Public Safety Partner critical facilities before general customers; however, PG&E did not formally identify these other non-Public Safety Partner critical facilities as priority notice entities. The notification launch sequence to the other non-Public Safety Partner critical facilities was a function of pre-existing customer database designations created prior to the PSPS program, not a function of identifying and agreeing to additional specific critical facilities in partnership with first/emergency responders and/or local government entities. Therefore, some customers in the numbers identified include Critical Facilities that are not part of the Commission's adopted definition of Public Safety Partners.
- Because some Public Safety Partners that are also agencies are not notified based on their customer account records, the data reported represents notifications to PG&E's customers of record with SPIDs and does not represent the automated Public Safety Partner notifications sent to agencies via PG&E's agency notification system, as described in the following data response provided on July 24, 2020: De-EnergizePowerLines_DR_CalAdvocates_021 Question 2.

Table No.	Description of Table
<u>Table 1</u>	The Number of Customer Accounts Who Missed Advance Notification in BOTH the October 9 to 12, 2019 and the October 23 to 25 De-Energization Events
<u>Table 2</u>	The Breakdown of the Customer Accounts from Table 1, by Customer Class
<u>Table 3</u>	The Number of Critical Facilities among the Customer Accounts from Table 1
<u>Table 4</u>	The Number of Customer Accounts Who Missed Advanced Notification in the October 9 to 12, 2019 De-energization Event OR October 23 to 25, 2019 De-energization Event
<u>Table 5</u>	The Number of Public Safety Partners Who Lost Access to PG&E's Secure Data Transfer Portal in the October 9 to 12, 2019 De-Energization Event

Description	Number of Customer Accounts
Customer accounts who did NOT receive advance notice: the October 9 to 12, 2019 de-energization event and the November 23 to 25, 2019 de-energization event	1773

Table 2: The Breakdown of the Customer Accounts from [Table 1](#), by Customer Class

Number of Customer Accounts from Table 1 , by Customer Class	Number of Customer Accounts
	22
NOT consolidate this figure with the number of industrial	185
NOT consolidate this figure with the number of (customers)	N/A [2]
	1566
State Government	0
Total Number of Customer Accounts	1773

Table 3: The Number of Critical Facilities among the Customer Accounts from [Table 1](#)

the Number of Customer Accounts from Table 1 , by Type	Number of Customer Accounts
Customer accounts who are Public safety partners NOT consolidate this figure with the number of priority (entities)	16 [3]
Public safety partners identified in the row right Number of customer accounts which are ALSO critical	16 [3]
Customer accounts who are priority notification entities NOT consolidate this figure with the number of public (partners)	N/A [3] [4]
Priority notification entities [1] identified in the row the number of customer accounts which are ALSO entities	N/A [3] [4]

The Commission's adopted definition of public safety partners does not include critical facilities and infrastructure for utilities and communication providers. The utility may, in partnership with first/emergency responders and government entities, identify other critical facilities that should receive priority notice. This guideline is set a floor, not a ceiling for priority notification

The customer type field for PSPS reporting uses a single, combined field for commercial/industrial customers, therefore data cannot be

specific critical facilities in partnership with first/emergency responders and/or local government entities. Therefore, some customers identified include Critical Facilities that are not part of the adopted definition of Public Safety Partners.

Notification entities are defined in D.19-05-042 p.A7 as follows: "The Commission's adopted definition of public safety partners does not include facilities and infrastructure beyond water utilities and emergency service providers. The utility may, in partnership with emergency responders and/or local government entities, identify facilities that should receive priority notice. This guideline is intended to be a floor, not a ceiling for priority notification." In response De-EnergizePowerLines_DR_CalAdvocates_022-2019 includes emergency hospital services as a priority notice entity, and the emergency service designations in the data are incorporated into PG&E's list of Public Safety Partners based on the expanded definition of Public Safety Partner that includes first responder/emergency responder, as defined in D.19-05-042 (pg. A4) to include, among others, medical services providers (including hospital emergency services). The emphasis added. Therefore, questions regarding priority notification entities are answered with "N/A".

Table 4: The number of customer accounts who missed advance notifications in more than one of the three de-energization events within the scope of this OSC. Please note that each row in Table 4 is a mutually exclusive category.

*Please note that PG&E is providing all the below numbers by SPID. Due to formatting protection in the spreadsheet shared by CalAdvocates, PG&E was unable to update the "Description". These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

Description	<u>Total</u> Number of Customer Accounts
The number of customer accounts who did not receive advance notification in the 1st <u>and</u> 2nd events	1773
The number of customer accounts who did not receive advance notification in the 1st <u>and</u> 3rd events	8351
The number of customer accounts who did not receive advance notification in the 2nd <u>and</u> 3rd events	1826
The number of customer accounts who did not receive advance notification in ALL three events (i.e., the 1st, 2nd, <u>and</u> 3rd events)	1664

Footnotes:

- [1] "1st event" as used herein refers to the PG&E October 9 to 12, 2019 de-energization event.
- [2] "2nd event" as used herein refers to the PG&E October 23 to 25, 2019 de-energization event.
- [3] "3rd event" as used herein refers to the PG&E October 26 to November 1, 2019 de-energization event.

Table 5: The Number of Public Safety Partners Who Lost Access to PG&E's Secure Data Transfer Portal in the October 9 to 12, 2019 De-Energization Event

Description	Number of Public Safety Partners (in terms of the number of customer accounts)
Number of hours when PG&E's secure data portal was unavailable during the October 9 to 12, 2019 de-energization event	N/A [1]
Number of hours when PG&E's secure data portal was unavailable through PG&E's website during the October 9 to 12, 2019 de-energization event	N/A [1]
Number of customer accounts who are public safety partners who LOST access to PG&E's secure data transfer portal during the October 9 to 12, 2019 de-energization event	N/A [1]

[1] Please see response to Question 2

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates_030-Q01		
PG&E File Name:	De-EnergizePowerLines_DR_CalAdvocates_030-Q01		
Request Date:	August 14, 2020	Requester DR No.:	030
Date Sent:	August 25, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 01

The December 23, 2019 Assigned Commissioner and Assigned Administrative Law Judge Ruling Setting Scope and Schedule of the Order to Show Cause (the OSC Scoping Ruling) stated the following:

PG&E failed to provide advanced notification to approximately **23,000 customers** out of the approximately 729,000 customers affected by the [October 9 to 12, 2019 de-energization] event....

PG&E failed to provide advanced notification to approximately **1,900 customers** out of the 177,000 customers affected by the [October 23 to 25, 2019 de-energization] event....

PG&E failed to provide advanced notification to approximately **28,600 customers**¹ out of the 941,000 customers affected by the [October 26 to November 1, 2019 de-energization] event.²

- a) Do the figures highlighted in bold above refer to the number of customers who did not receive any notification from PG&E **before the de-energization event** started i.e. including and up to the **very minute the de-energization event started**?
- b) Please explain in full and complete detail how the updates or amendments PG&E has made to these figures subsequent to PG&E's submission of the report and the issuance of OSC Scoping Ruling has changed these figures.
- c) If the answer to part (a) of this question is no, please explain what these figures are exactly, including but not limited to explaining how little notification, if any, these customers may have received.

¹ PG&E later corrected this figure from 28,600 customer to 22,000 customers in the Amended Post-Event Report on January 27, 2020 and most recently corrected the same figure from 22,000 customers to 25,900 in the Amended Post-Event Report on July 24, 2020 upon discovering that it failed to notify an additional 3,900 customers ahead of the October 26 to November 1, 2019 de-energization event.

² December 23, 2019 Assigned Commissioner and Assigned Administrative Law Judge Ruling Setting Scope and Schedule of the Order to Show Cause, pp. 3 to 4.

ANSWER 01

- a) The reference to customers who were not provided “advanced notification” as reported in PG&E’s post-event ESRB-8 reports refers to customers who were not provided any notification from PG&E before they were de-energized.
- b) PG&E has made two sets of revisions to the numbers of customers who were not provided “advanced notification” as reported in PG&E’s original ESRB-8 reports for each event.
 - 1. On January 27, 2020, PG&E submitted an amendment to its ESRB-8 reports for the late 2019 PSPS events, which revised the total numbers of customers who were not provided advanced notification before being de-energized. The reason for the revisions to the number of customers is discussed in the response to Cal Advocates-PGE-R1812005-OSC-26, Question 6, delivered on August 18, 2020.
 - 2. On July 24, 2020, PG&E updated the ESRB-8 report for the October 26—November 1 event to include an additional approximately 3,900 customers that were not provided advanced notification before being de-energized. The reason that these customers were not previously identified as missed is discussed in response to Cal Advocates-PGE-R1812005-OSC-26, Question 1.a, delivered on August 18, 2020.
- c) N/A. Please see the response to Question 1.a.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 030-Q02		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 030-Q02		
Request Date:	August 14, 2020	Requester DR No.:	030
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 02

When responding to Cal Advocates' Question 11 in data request CalAdvocates-09 (see the attached PubAdv-PGE-OSC-DR-21_Q2_Attch01.docx and PubAdv-PGE-OSC-DR-21_Q2_Attch02_CONF.xlsx), PG&E provided figures related to the "customers who were not given advanced notices for the October 2019 [de-energization] events". These figures included the number of customer accounts broken down by customer class and the number of critical facilities.

- a) Please explain how the figures PG&E provided in part (a) of Question 11 of data request CalAdvocates-09 correspond to the number of customers referred to in the OSC Scoping Ruling, referenced above in Question 1.
- b) When the figures in Cal Advocates-09 Question 11 are broken down by customer class and number of critical facilities how many customers in each category did not receive any notification from PG&E before the de-energization event and until the very minute the de-energization event started?
- c) Do the figures which PG&E provided:
 - in part (c) of Question 11 of data request CalAdvocates-09, and
 - in the attachment *De-EnergizePowerLines_DR_CalAdvocates_09-Q011Atch01CONF.xlsx*

correspond to the number of customer accounts accounts, Service Point ID (SPID), or distinctive physical premises **of critical facilities** who did not receive any notification from PG&E **before the de-energization event and until the very minute the de-energization event started?**

ANSWER 02

- a) As explained in response to Question 1.b., PG&E amended its post-event ESRB-8 reports for the late 2019 PSPS events on January 27, 2020 (after the December 23, 2019 OSC Scoping Memo) and updated its ESRB-8 report for only the October 26-November 1 event to include approximately 3,900 customers that were not provided advance notification before being de-energized. As a result, the figures provided in response to the Cal Advocates-09 Question 11 are not the same as the figures included in the Scoping Memo.

For purposes of clarity, PG&E provides the following chronology of events:

- On November 12, 2019, the Commission initiated the OSC Phase of R.18-12-005.
- On December 19, 2019, the Assigned Commissioner issued the Amended Phase 2 Scoping Memo and Ruling requiring, among other things, for PG&E to formally submit its post-PSPS event reports for the record.
- On December 23, 2019, the Assigned Commissioner and ALJ issued a Ruling Setting the Scope and Schedule of the OSC, which included, among other things, the number of missed customer notifications as reported in PG&E's original post-PSPS event reports.
- On December 30, 2019, in compliance with the December 19 Amended Phase 2 Scoping Memo and Ruling, PG&E formally submitted its post-PSPS event reports for the June 7-9, September 25-27, October 5-6, October 9-12, October 23-25, October 26 & 29, and November 20-21 PSPS events. In each of the pleadings accompanying these submissions, PG&E included the following language:

As PG&E stated in its Response to Order Instituting Investigation (filed December 13, 2019, in I.19-11-013), PG&E typically requires several months to review, reconcile, and validate outage data for the year in full. However, PG&E plans to accelerate the same level of review and validation for the 2019 PSPS events, and PG&E will submit the reviewed and validated data to the Commission and the Phase One Consultant in I.19-11-013 by January 17, 2020.

- On January 16, 2020, PG&E informed the parties to R.18-12-005 by email that it would need additional time to confirm accuracy of the data related to the Late Fall 2019 PSPS events, as well as for the June and September 2019 PSPS events, and would serve the validated information for the Late Fall 2019 PSPS events by January 27, and the validated data for the June and September 2019 PSPS events by February 28.
- On January 27, 2020, PG&E submitted amended ESRB-8 reports for the Late Fall 2019 PSPS events. In general, the number of affected customers and missed notifications increased slightly for most of the Late Fall 2019 PSPS events, but notably, the number of missed notifications for the October 26 & 29 PSPS event went down between the original ESRB-8 report and the amended report (see page 5 of the pleading accompanying the amended report). The pleading and amended reports may be found here: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M335/K511/335511384.PDF>

- On July 24, 2020, PG&E filed and served an updated ESRB-8 report for the October 26 & 29 PSPS event only, noting that PG&E had missed approximately 3,900 customers from its count of advance notifications.
 - As explained in response to CalAdvocates 026-Q01, these customers were missed from PG&E's previous ESRB-8 reports because the October 26-November 1 event involved two overlapping outages – the first beginning on October 26, and the second beginning on October 29 – and PG&E's methodology for assessing customer notifications (comparing the list of customers de-energized with the list of customers notified) did not allow for PG&E to realize that certain customers were included in the October 26 de-energization event and did not receive prior notification, but they did receive prior notification of the October 29 event.
 - Please note that the number of missed notifications, including missed Medical Baseline notifications, for the October 26 & 29 PSPS event is less than the number in the OSC:

	As shown in OSC (from original ESRB-8 report)	1/27/2020 Amendment	7/24/2020 Update
Total Customer Notifications Missed for customers experiencing outages one hour or longer	28,600	22,000	25,900
Total MBL Customer Notifications Missed for customers experiencing outages one hour or longer	700	400	500

- Except for the October 26 & 29 PSPS event, the numbers reported in response to CalAdvocates-09 Question 11 match the numbers in the amended ESRB-8 reports of January 27, 2020.¹

¹ Any further differences in the ESRB-8 reports and customer breakdowns in this request or CalAdvocates-09 are due to rounding.

- b) The total missed notifications for the amended October 9--12 and October 23--25 ESRB-8 reports match what was submitted in response to CalAdvocates-09 Question 11¹. For the October 26—November 1 event, an additional approximately 3,900 customers were identified as missed, as discussed in response to Question 1.b of this request and further explained in response to Question 2.a. The new breakdowns can be seen in the tables below along with the breakdown by Critical Facilities impacted per event.

Approximate Customers (by SPID) Not Notified in October 26—November 1 Event by Customer Class²	
Agricultural	200
Commercial/Industrial ³	2700
Residential	23000
California State Government	30
Total	25,930

Impacted Critical Facilities (by SPID) Not Notified⁴	
October 9--12	123
October 23--25	18
October 26—November 1	132

² Values are rounded consistent with values provided in CalAdvocates-09. These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

³ PG&E's customer type field for PSPS reporting uses a single, combined designation of commercial/industrial customers, therefore data cannot be provided broken out between the two as requested. Additionally, PG&E's combined reporting of industrial and commercial customers in the context of PSPS aligns with ESRB-8 requirements to report the number of affected customers, by residential, medical baseline, commercial/industrial, and other.

⁴ PG&E's responses for customer counts as requested by different types, segments, or designations reflect PG&E's customers of record and their designations as of May 2020. These totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope.

- c) The figures provided in Attachment *De-EnergizePowerLines_DR_CalAdvocates_09-Q011Atch01CONF.xlsx*, submitted on March 13, 2020, is reported by Service Point ID (SPID).

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 030-Q03		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 030-Q03		
Request Date:	August 14, 2020	Requester DR No.:	030
Date Sent:	August 28, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

QUESTION 03

When responding to Cal Advocates' data request CalAdvocates-09 with the number of customer accounts who missed "advance notification,"

- a) How did PG&E define and interpret the term "advance notification"?
- b) Please include in PG&E's definition of "advance notification" how many hours of notice ahead of a de-energization event in October 2019 constitutes "advance notification" under PG&E's definition.

ANSWER 03

- a) Please see the response to Question 1.a. for an explanation of how PG&E interprets "advance notification."
- b) Please see the response to Question 1.a. PG&E does not define "advance notification" in this context by number of hours.

PACIFIC GAS AND ELECTRIC COMPANY
De-Energize Power Lines OIR
Rulemaking 18-12-005
Data Response

PG&E Data Request No.:	CalAdvocates 033-Q01		
PG&E File Name:	De-EnergizePowerLines DR CalAdvocates 033-Q01		
Request Date:	September 2, 2020	Requester DR No.:	033
Date Sent:	September 18, 2020	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Pui-Wa Li

Statistics of PG&E's October 2019 De-Energization Events (in terms of the Number of Customer Accounts)

QUESTION 01

The De-Energization Guidelines set forth in Appendix A to Decision 19-05-042 state that:

The electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline:

- 48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities
- 24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations
- 1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations
- When de-energization is initiated: notification of all affected customers/populations
- Immediately before re-energization begins: and notification of all affected customers/populations
- When re-energization is complete: notification of all affected customers/populations¹

In light of the De-Energization Guidelines above, please fill in the three tables (Tables 1 to 3) below with the appropriate number of public safety partners/priority notification entities, all other affected customers/populations, and all affected customers/populations notified as indicated for PG&E's October 2019 de-energization events, in terms of the number of **customer accounts**.

¹ Decision 19-05-042, pp. A8 to A9.

Table 1: Public Safety Partners/Priority Notification Entities (in terms of the number of *customer accounts*)

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of <i>customer accounts</i> of public safety partners/priority notification entities who did not receive 48- to 72-hour advanced notification and who experienced outages of 1 hour or longer			
Among the number of <i>customer accounts</i> of public safety partners/priority notification entities who did not receive 48 to 72- hour advanced notification, number of <i>customer accounts</i> of public safety partners who did not receive 1- to 48- hour advanced notification and who experienced outages of 1 hour or longer			

Table 2: All Affected Customers/Populations Other Than Public Safety Partners/Priority Notification Entities (in terms of the number of *customer accounts*)²

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of <i>customer accounts</i> of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification and who experienced outages of 1 hour or longer			
Among the number of <i>customer accounts</i> of all affected customers (other than public safety partners/priority notification entities) who did not receive 24- to 48-hour advanced notification, number of <i>customer accounts</i> of all affected customers (other than public safety partners/priority notification entities) who did not receive 1- to 24-hour advanced notification and who experienced outages of 1 hour or longer			

² For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the **number of distinctive entities** would be reported as one. This is because the priority notification entity counts as a single entity.

Table 3: All Affected Customers/Populations (in terms of the number of customer accounts)³

Description	October 9 to 12, 2019 PSPS Event	October 23 to 25, 2019 PSPS Event	October 26 to November 1, 2019 PSPS Event
Number of <i>customer accounts</i> of ALL impacted customers who did not receive any advance notification before a de-energization event was			
initiated and who experienced outages of 1 hour or longer			
Number of <i>customer accounts</i> of ALL impacted customers who did not receive notification immediately before their power was turned back on and who experienced outages of 1 hour or longer			
Number of <i>customer accounts</i> of ALL impacted customers who did not receive notification when re- energization was completed and who experienced outages of 1 hour or longer			

ANSWER 01

PG&E is providing the below customer counts by Service Point ID (SPID). Consistent with PG&E's OSC testimony, these totals exclude customers that experienced a short duration loss of power that lasted for one hour or less, and often no more than a few minutes. These customers were not in the PSPS event scope and only briefly lost power as PG&E worked to de-energize or restore power across its system to other customers who were within the event scope. PG&E's responses for customer counts as requested by different types, segments, or designations reflect PG&E's customers of record and their designations as of May 2020. For more information on the definition and relationship between Public Safety Partners and Priority Notification Entities, please

³ For example, if a priority notification entity has six critical facilities (i.e., at six different physical addresses) that would be de-energized, then the **number of distinctive entities** would be reported as one. This is because the priority notification entity counts as a single entity.

see PG&E's response to De-EnergizePowerLines_DR_CalAdvocates_029, Question 1, Revision 1, submitted on August 31, 2020.

The number of customers and Public Safety Partners notified during each time range in the minimum notification timeline depends on the known scope of the event at that point in time. The scope of the event may change in the time leading up to the event due to changes in the weather forecast and footprint, among other reasons. As the event approaches, the event scope becomes more certain and PG&E may identify and notify additional customers that were not previously identified as within the event scope during earlier timeframes. This context applies to the delivery of advance notifications according to the minimum notification timeline; please see Chapter 3 of PG&E's Opening Testimony for the reasons why some customers may have received no direct notification prior to de-energization.

Pursuant to the teleconference between PG&E and Cal Advocates on October 6, 2020, PG&E is providing the following information by “customer account” (as requested by Cal Advocates) in addition to SPID (as previously provided by PG&E).

As explained by PG&E to Cal Advocates, PG&E has previously declined Cal Advocates’ requests for information by “customer account” rather than SPID, in PSPS OSC and OII discovery, because PG&E believes it would be misleading and erroneous to do so. SPID is the data of record and basis for the publicly reported data in PG&E’s ESRB-8 Reports, among other documentation.

PG&E’s Electric Rule No. 1 (“Definitions”) has the following relevant definitions:

- ACCOUNT: A PG&E-specific identifier for tracking energy service deliveries for a specific load through one or more meters at a customer premises or location. One customer may have several accounts within a premises or throughout PG&E’s service territory. [Emphasis added]
- CUSTOMER: The person, group of persons, firm, corporation, institution, municipality, or other civic body, in whose name service is rendered, as evidenced by the signature on the application, contract, or agreement for that service or, in the absence of a signed instrument, by the receipt and payment of bills regularly issued in that name, regardless of the identity of the actual user of the service. A customer may take Bundled Service or Direct Access Service or Community Choice Aggregation Service, but must take final delivery of electric power, and not resell that power.

Although not a defined term in PG&E’s Electric Rule No. 1, SPID (or Service Point Identification) is an even more granular view than Account and refers to the individual points of connection at which PG&E provides electric service to the customer.

As noted above, one “Customer” may have several accounts, and one “Account” may cover multiple premises or meters resulting in multiple SPIDs.

For example, Walmart could be listed in PG&E’s system as a single “customer” but have numerous “accounts” (e.g., for each of its stores) and numerous SPIDs for each of its accounts – for example, one SPID for the parking lot lights and another for the store itself.

For this reason, PG&E’s PSPS notification process is based on SPID rather than Customer, and all of PG&E’s reported data about PSPS notifications – including in its ESRB-8 post-event reports, its Order to Show Cause testimony, and its data responses submitted in the OSC and OII (with one exception) – have been based on SPID rather than Customer. When PG&E refers to “customers” in its PSPS-related reports and other documents, that term is used in its plain English meaning, not as a defined term under PG&E’s Electric Rule No. 1.

**Table 1 Missed Advance Notification for the October 5 to 6 and November 20 to 21, 2019 PSPS Events
(in terms of customer accounts)**
Reference: DR-I1911013-01, Question 1

PSPS Start Date	PSPS End Date	Public Safety Partners (No. of Customer Accounts)		All Other Customers (No. of Customer Accounts)		ALL Customers (No. of Customer Accounts)
		Failed 48- to 72-hour notice	Failed 48- to 72- hour <u>AND</u> 1- to 48-hour notice	Failed 24- to 48-hour notice	Failed 24- to 48- hour <u>AND</u> 1- to 24-hour notice	Failed advance notification before a de-energization was initiated
Oct 05	Oct 06	71	8	1,385	1,385	1,315
Nov 20	Nov 21	201	1	4,061	780	781 ¹

**Table 2 Missed Notification for Re-Energization for Late 2019 PSPS Events (in terms of customer
accounts)**
Reference: DR-I1911013-01, Question 1 and DR-I1911013-05, Question 1

			All Customers (No. of Customer Accounts)	
	Start Date	End Date	Number of Customers Accounts who did not receive any notification immediately before power was turned back on	Number of Customers Accounts who did not receive any notification immediately when re- energization was completed
PG&E	Oct 05	Oct 06	1,284	1,333
	Oct 09	Oct 12	230,364	495,162
	Oct 23	Oct 25	167,526	167,526
	Oct 26	Nov 01	896,065	653,125
	Nov 20	Nov 21	9,670	11,184

¹ Includes outages </= 1hr

Table 3: Medical Baseline Customers Impacted (outages over AND less than one hour)

Reference: DR-I1911013-06, Question 1 and DR-R1812005-028, Question 3

Customer type	October 5 to 6, 2019 PSPS Event	October 9 to 12, 2019 PPS Event	October 23 to 25, 2019 PPS Event	October 26 to November 1, 2019 PPS Event	November 20 to 21, 2019 PPS Event
Total Number of Medical Baseline Customer Accounts affected by the PPS event (outages over AND less than one hour)	730	30,132	7,908	35,786	2,422
Number of Medical Baseline Customer Accounts affected by the PPS event notified 24 to 48 hours in advance of the PPS event (outages over AND less than one hour)	660	24,562	7,662	26,845	2,283
Number of Medical Baseline Customer Accounts affected by the PPS event notified less than 24 hours in advance of the PPS event (outages over AND less than one hour)	665	29,541	7,790	34,626	2,350
Number of Medical Baseline Customer Accounts affected by the PPS event not notified in advance at all (outages over AND less than one hour)	65	587	22	901	8

Table 4 – key differences between the scoping ruling and the updated ESRB-8 report (in terms of customer accounts)

Data	Number of customer accounts to be confirmed by PG&E	Scoping memo of December 23 2019 (and Original ESRB-8 Report dated November 18, 2019)	Updated ESRB-8 Report dated Jan 27, 2020	Updated ESRB-8 Report dated July 24, 2020 (applicable to Oct 26 event only)
October 9-12 PSPS event				
PG&E failed advanced notice to customers affected by the PSPS event	22,773	23,000	Not updated	n/ a
PG&E failed advanced notice to medical baseline customers affected by the PSPS event.	n/a	500	600	n/ a
Total Number of De-Energized Customers	681,852	729,000	735,000	n/a
Total Number of Impacted medical baseline customers	n/a	n/a (30,000)	30,300	n/a
October 23-25 PSPS event				
PG&E failed advanced notice to customers affected by the PSPS event	1,994	1,900	2,069	n/a
PG&E failed advanced notice to medical baseline customers affected by the PSPS event	22	15	22	n/a
Total Number of De-Energized Customers	167,526	177,000	178,800	n/a
October 26-November 1 PSPS event				
PG&E failed advanced notice to customers affected by the PSPS event ²	25,118	28,600	22,000	25,900
PG&E failed advanced notice to	10,375	N/A (13,000)	13,000	Not updated

² Outages > 1 hr

customers affected by the PSPS event ³				
PG&E failed advanced notice to medical baseline customers affected by the PSPS event ⁴	512	700, which is a subset of the 28,600 customers above	400, which is a subset of the 28,600 customers above	500
Total Number of De-Energized Customers ⁵	896,065	Roughly 941,000 (941,266)	967,705	Not updated

Table 5: Customers Notice for the October 9 to 12 PSPS event

	(a)	(b)	(c)	(d)
Customer type (ALL in terms of number of customer accounts)	Customers receiving no notice before the event at all	Customers only receiving less than one hour's notice	Customers only receiving less than 24 hours' notice (or 48 hours for public safety partners)	Total number of customers accounts de-energized
All customers other than public safety partners / priority notification entities	780	N/A	N/A	45,923
public safety partners / priority notification entities	1	N/A	N/A	258
Total	N/A	N/A	N/A	46,143⁶

Table 6: Customers Notice for the October 26 PSPS event

³ Outages <= 1hr

⁴ Outages > 1 hr

⁵ All outages

⁶ The combined total of 45,923 + 258 is 46,181. It is higher than this figure because an account can be associated to PSP and Non-PSP SPIDs

	(a)	(b)	(c)	(d)
Customer type (ALL in terms of number of customer accounts)	Customers receiving no notice before the event at all	Customers only receiving less than one hour's notice	Customers only receiving less than 24 hours' notice (or 48 hours for public safety partners)	Total number of customers accounts de-energized
All customers other than public safety partners / priority notification entities	35,369	49,895	212,764	892,562
public safety partners / priority notification entities	129	98	1,220	3,898
Total	35,486 (~3.7 % of all de-energized customers)	49,993 (~5 % of all de-energized customers)	213,984 (~22 % of all de-energized customers)	896,065⁷

Note: Figures along column (a) are a subset of those along (d). Similarly, figures along column (b) are a subset of those along (c), which are a subset of those along Column (d).

Table 7: Total missed notifications for the October 26 PPS event (extracted from Table 1)

Customer type (ALL in terms of number of customer accounts)	Number of customer accounts to be confirmed by PG&E	Scoping memo of December 23, 2019 (and Original ESRB-8 Report dated November 18, 2019)	Updated ESRB-8 Report dated Jan 27, 2020	Updated ESRB-8 Report dated July 24, 2020 (applicable to Oct 26 event only)
Total De-Energized customers (who experienced outages OVER one hour)	25,118	28,600	22,000	25,900
PG&E failed advanced notice to customers affected by the PPS event (who experienced outages LESS THAN one hour)	10,375	n/a	13,000	Not updated

⁷ The combined total of 892,562 + 3,898 is 896,460. It is higher than this figure because an account can be associated to PSP and Non-PSP SPIDs

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**Marin County, CA Fire Department**

Sunday June 28th, 2020 :: 07:56 p.m. PDT

Advisory

Red Flag Warning - June 28-29 Message Expired**Marin County Fire Chiefs Association**

For Immediate Release

June 28, 2019

Red Flag Warning In Effect for Marin County**Warning to remain in place until Monday Evening**

Marin County, CA -- The National Weather Service has issued a Red Flag Warning for the North Bay Mountains and other parts of the Bay Area above 1000 feet, which is in effect from 10 PM this evening (Sunday) to 8 PM Monday.

A Red Flag Warning means that critical fire weather conditions are expected during this time frame with a combination of strong off shore winds with gusts to 30-45 miles per hour and low relative humidity ranging from 15-25% percent.

The affected area includes higher terrain areas of Marin, Napa, Sonoma counties.

The concerns of this weather system are that fires that develop will likely spread rapidly.

The following land use restrictions are in effect for the Marin Municipal Water District, Mount Tamalpais State Park, and The Point Reyes National Seashore during the Red Flag conditions.

- Closures at Sky Oaks, Natalie Coffin Green Park (Ross), and Leo Cronin Parking Lot, MMWD
- Mount Vision Rd, Inverness (National Park Service)
- All open burning and burn permits are suspended on public lands
- Closures to Mount Tamalpais State Park (in effect until 7:00 a.m. on the 30th) - Roads north of Panoramic Highway are closed to motor vehicle traffic on Pantoll Road and Ridgecrest Boulevard. All park use permits north of Panoramic Highway are suspended, including filming.

Residents are advised to exercise extreme caution during the Red Flag Warning because a simple spark could cause a major wildfire, including the use of equipment and machinery as well as smoking.

The Mount Tamalpais State Park information number is 415-388-2070.

The Marin Municipal Water District information number is 415-945-1195.

The Marin County Fire Information Hotline number is 415-473-7191.

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Defensible space is essential to improve your home's chance of surviving a wildfire.

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###

RED FLAG WARNING

Information Valid as of June 28, 2020

North Bay Mountains above 1,000 ft
10 PM Sunday to 8 PM PDT Monday

N/NE 15-25 mph with gusts to 30-45 mph
Local gusts at highest peaks and ridges near 50 mph

- Extreme fire behavior
- Gusty and strong north to northeast winds
- Low relative humidity
- Any fires that develop likely to spread rapidly

Hazards
Red Flag Warning
Fire Weather Watch

NATIONAL WEATHER SERVICE
NATIONAL OCEANIC & ATMOSPHERIC ADMINISTRATION

San Francisco Bay Area/Monterey
weather.gov/bayarea

Address/Location
[Marin County, CA Fire Department](#)
33 Castle Rock Ave
Woodacre, CA 94973

Contact
Emergency: 9-1-1
Non-emergencies: 415-473-7191

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