

September 8, 2020

President Marybel Batjer
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

President Batjer:

Thank you for the recent opportunity to brief you and the California Public Utilities Commission (CPUC) on 2020 Public Safety Power Shutoff (PSPS) readiness, and for your letter dated August 27, 2020. On behalf of Pacific Gas and Electric Company (PG&E), please accept our gratitude to the CPUC and the first responders who have been working tirelessly to keep Californians safe during the recent wildfires, severe weather events and the ongoing COVID-19 pandemic.

The safety of our customers and the communities that we are proud to serve is our most important responsibility. The devastation caused by wildfires in recent weeks has served as a stark reminder of the risks our state faces, and the importance of doing everything possible to stop wildfires before they begin. That is why we made the difficult decision this week to turn off power before a severe weather event that the National Weather Service described as having high wildfire potential.

We only use PSPS as a last resort when the weather is so severe that homes, businesses and lives could be at risk of a major wildfire. We know that PSPS events cause disruption and hardship for our customers, particularly with so many Californians working and learning from home due to COVID-19 and when temperatures are as high as they have been this week. That is why we are focused on making PSPS events smaller in size, shorter in length and smarter for our customers, without compromising safety. As we conduct our first event of 2020, we understand how important it is for us to improve our performance this year.

Below please find our responses to your August 27 letter. We look forward to discussing these with the CPUC and the public at your meeting on September 10.

Medical Baseline Customers and Equipment: The number of medical baseline customers dependent on powered medical equipment in areas potentially impacted by PSPS that have not received the backup batteries your companies have committed to providing as of the date of this letter. What is the total number of batteries that will be deployed and the timeline to achieve full deployment of the batteries?

There are three programs in place to help support this customer group with backup power:

- Portable Battery Program
- Disability Disaster Access and Resource Program
- Self Generation Incentive Program

As of September 8, 2020, we have distributed approximately 467 batteries to customers under all these programs, with a plan to deploy more than 6,000 batteries by October 31, 2020. PG&E has also authorized additional funding to enable deployment of up to 3,500 additional batteries by the end of November, pending battery availability and customer need.



	PBP	CFILC	Total
# Currently Deployed	467		467
# Deployed by 10/31	4,450	1,550	6,000
# Deployed by 11/30	8,000	1,550	9,550

Portable Battery Program

In August we launched the Portable Battery Program. This program provides fully subsidized battery systems for low-income customers who live in high fire-threat districts (HFTD) and are enrolled in the Medical Baseline program. Working in coordination with CBOs, we have identified approximately 10,500 customers who could qualify for this program. Customers are selected to receive batteries based on energy assessment surveys conducted by the CBOs. The PBP was initially scoped to provide approximately 4,000 batteries for the low-income Medical Baseline customers in 2020 but has recently been expanded to 8,000 batteries. PG&E has provided \$19 million to fund this effort in 2020.

Disability Disaster Access and Resource Program

We are also working with the California Foundation for Independent Living Centers (CFILC) through the Disability Disaster Access and Resource Program to aid disabled and/or aging populations who rely on power for medical or independent living needs. Through this program, local Independent Living Centers (ILCs) are providing approximately 850 backup portable batteries to customers who will need power during a PSPS. CFILC is procuring another 700 batteries to be deployed in September and October. In addition to providing portable batteries, CFILC is helping customers prepare emergency plans, as well as providing transportation, and coordinating hotel stays and food stipends during PSPS events. For the PSPS event taking place today, we have worked with the CFILC to secure 23 hotel rooms and we are working to identify additional locations that may be available. PG&E has provided \$5M to fund this effort in 2020 in addition to the 850 batteries.

Self Generation Incentive Program

PG&E is a Program Administrator of the Self Generation Incentive Program (SGIP), which is providing financial incentives for Medical Baseline customers installing new, qualifying equipment for storing energy for their homes. The SGIP Equity Resiliency incentive is designed to allow customers to install a home battery storage system at no cost to them. Currently we have more than \$38 million of SGIP incentives allocated for more than 1,400 Medical Baseline customer applications. In July PG&E was approved for our SGIP Marketing Education and Outreach Plan and our Financial Assistance pilot, both of which specifically focused on supporting medical baseline customers in HFTD. The Financial Assistance pilot alleviates the need for customers to pay upfront costs and enables additional customers to participate in the program. We are actively enrolling SGIP developers and expanding this pilot to eligible medical baseline customers. As of September 1, we have interconnected 176 battery storage systems, 69 of those being for Medical Baseline customers.

This information was provided to the CPUC as part of our September Access and Functional Needs (AFN) Progress Report to the CPUC.



Community Resource Centers (CRCs): A list of the fully ready CRCs of all types as of the date of this letter, including hard-sided buildings, pop-up tents, and vans. Please provide a comparison to your target numbers of CRCs of all types. For each CRC, provide information on hours of operation, location, services provided, and what changes have been made or are in preparation to be made in response to COVID-19. How many and what type of CRCs will be located close to tribal lands?

As we have noted in previous communications with the CPUC, we have shifted our approach to include more outdoor Community Resource Center (CRC) sites due to COVID-19. As of September 2, 2020, all 128 outdoor sites confirmed by counties are “event ready”, as well as 97 additional outdoor sites, for a total of 225.

We have also secured 56 indoor sites against the September 1, 2020 target of 80. COVID-19 has created delays in the process of confirming, accessing and hardening some indoor sites. We will continue to actively pursue indoor CRC sites until all 110 sites confirmed by local Offices of Emergency Services are secured by end of year.

In total, we have 281¹ event-ready outdoor and indoor sites as of September 2, 2020. By comparison, we operated approximately 70 (mostly outdoor) CRC sites in 2019. For the PSPS event taking place today, we have 50 locations open, including 45 outdoor sites and 5 indoor sites.

After PG&E has activated the Emergency Operations Center for a PSPS event and prior to de-energization, we coordinate with county and tribal governments regarding CRC deployment strategies, types and locations. Outdoor Micro CRCs (smaller, open air tents) and Mobile CRCs² (vans) will be deployed when an indoor site is unavailable, and to support communities when physical distancing guidelines are in place due to COVID-19 and/or other public health protocols.

The standard hours of operations for all CRCs will be 8 a.m. to 10 p.m., per CPUC direction. During a PSPS event, we will confirm operating hours with local governments, tribes and site owners to implement any operational changes for public health or safety reasons (e.g., local curfew, inability to access, safety issues). CRC locations are published on our website, shared on social media, and shared with state and county officials and news media.

We adapted our approach to CRCs to reflect appropriate COVID-19 health considerations and state and county guidelines, including facial coverings, physical distancing and limits on the number of visitors at any time. At indoor CRCs, temperature checks are required for entry. At outdoor CRCs, supplies are handed out so customers can “grab and go”, and seating will be available only for customers needing medical equipment charging.

In January 2020, we began outreach to 62 tribes in PG&E’s electric service area regarding indoor CRC sites. As of September 2, 2020, we have seven event-ready outdoor sites and three event-ready indoor sites on tribal land. Additional detail on all the sites recommended by tribal governments, the locations that are event-ready and the tribes they support are provided in the Appendix.

The Appendix includes information regarding CRC types, a full list of CRC sites, resources provided and COVID-19 mitigation measures. Additional information is available in the Community Resource Center Plan included in PG&E’s Progress Report on Phase 2 OIR Implementation of De-Energization Guidelines submitted on August 4, 2020.

¹ We are providing the most up-to-date information. As of the letter dated August 27, 2020, there were 275 event-ready CRCs including 223 outdoor and 52 indoor.

² 30 Sprinter vans have been secured.



Rural Residential Well Water Needs: An update on your company's consultation with rural residents who depend on well water powered by electricity.

PG&E has not until recently had an explicit program focus on how to support rural residents who need electricity for well water pumping. But as we have seen in recent weeks, it is important for all customers to be prepared for different types of outages, whether they are PSPS events called by PG&E, wildfire-related outages initiated at the request of first responders such as CAL FIRE, or rotating outages initiated by the California Independent System Operator (CAISO). We are supporting customer preparedness and resiliency outreach by providing information and resources to customers interested in backup power solutions. This includes tools for comparing backup power options and an [online marketplace](#) to find vendors. Through our online [Safety Action Center](#), we offer customers tools and tips to learn more about backup power safety. We have also provided information on backup power options during 17 virtual webinars for every county in our service territory with approximately 5,000 total attendees.

As mentioned above, PG&E is an SGIP Program Administrator, which also provides battery storage incentives to customers who rely on electric well pumps. To date, we have received more than 2,600 applications from customers with well pumps, and we have allocated nearly \$80 million of the SGIP Equity Resiliency budget toward this effort. PG&E is also planning to offer a \$300 rebate on the purchase of a qualifying gasoline generator for customers who depend on well-water pumping for their primary residence or small business water needs; this will directly target well-water customers in HFTDs. The rebate is available to eligible customers who have recently purchased a qualifying generator.

Tribal Government Outreach: An update on your company's consultation with tribal governments, especially on how to improve communication and coordination for the restoration of power after a PSPS event.

This year, we have improved our coordination with tribal governments. We have reached out to all federally recognized tribes within our service area to coordinate on CRC locations, PSPS notification contacts, PSPS portal access and training and local progress updates. We also held Listening Sessions with tribal governments from Sonoma, Mendocino, Humboldt and Lake counties earlier this year to gather feedback about 2019 PSPS events and identify methods to improve collaboration. Representatives from the Hopland Band of Pomo Indians and Robinson Rancheria Pomo Indians of California participate in the PSPS Advisory Committee, which meets regularly to share feedback on PSPS preparedness.

Beginning in March, PG&E began partnering with tribes within its service territory to co-host Wildfire Safety working sessions and participate in county working sessions. We gave all tribes county-specific PSPS preparation information prior to June 1, 2020. We worked closely with the Tuolumne Band of Me-Wuk Indians and their office of emergency services to host the first tribal-led Wildfire Safety Working Session on June 23, 2020. Through these working sessions, PG&E provided an overview of local plans for wildfire mitigation and system resiliency, and discussed ways to work together to improve PSPS communications and coordination. In July, we invited tribal representatives to participate in the Regional Working Group discussions to gather feedback and input on wildfire safety activities and PSPS coordination and preparedness.

We have increased the number of tribal agency representatives on PG&E staff to assist tribes during an event, moving from one dedicated tribal representative in 2019 to 10 representatives this year. For each event, three tribal representatives are available to work regionally with PSPS-impacted tribes to resolve local issues in real time and provide restoration status updates for tribal communities.

For 2020 PSPS events, we are providing a situation report to tribal representatives and other governmental officials two times a day with specific information about de-energization times and restoration status. These situation



reports are shared before each Tribal Cooperators Call, where PG&E's Tribal Liaison Branch Manager discusses the report and answers any questions. All tribes, regardless of whether or not they are in scope, are also invited to the daily Systemwide Cooperators Call hosted by PG&E's Emergency Operations Center to receive situational awareness information, including restoration timing and status (although this should be the same information that is provided during the Tribal Cooperators Calls).

Outreach to People with Self-Identified Disabilities: An update on your company's outreach to people who have self-identified as having a disability, and how your notification protocols will be improved for this additional group, pursuant to the requirement in Commission Decision 20-05-051.

This year we have improved our PSPS outreach and awareness campaigns targeted to Medical Baseline customers to reach self-certified vulnerable and self-identified disabled customers. PG&E sent preparedness brochures, email and postcards targeted to customers reliant on power for medical and independent living needs to self-certified vulnerable and self-identified disabled customers in addition to those enrolled in the Medical Baseline program.

This outreach includes our promotional campaign focused on increasing enrollment into the Medical Baseline program. The multi-channel campaign targeted customers with the highest likelihood to qualify for and enroll in the Medical Baseline Program based on a propensity model that uses qualified predictors for enrollment, combined search engine marketing, digital display advertising, and customer bill inserts with two million email and direct mailers to potentially eligible customers not currently enrolled.

PG&E employees in our Customer Service Offices (CSO) department (who have been working from home since March) have been proactively contacting customers who have self-identified as having a disability or are vulnerable to promote the Medical Baseline Program, verify contact information and communication preferences, review emergency preparedness plans, and promote other programs and services that could help the customers during a PSPS event. CSO employees are performing these same proactive outreach calls to our current Medical Baseline customers. This customer call campaign also promotes SGIP and the Disability Disaster Access and Resources programs with the CFILC. As of August 19, 2020, our staff have conducted more than 30,000 customer calls and reached over 8,000 customers.

This year the Medical Baseline Program includes customers who have self-identified as needing power for medical needs, because we are not requiring a physician's certification for a customer to qualify for the Medical Baseline Program due to COVID-19. Thanks to increased outreach and the change to self-certification, PG&E has more than 45,000 new Medical Baseline enrollments to date this year, an approximately 15% increase over this time last year and the largest number of PG&E Medical Baseline customers ever. We have also conducted a detailed review of customer contact information and reduced the number of Medical Baseline customers with missing contact information from 655 to six.

In addition to expanding enrollment this year, we have improved PSPS notifications for all customers. This year's PSPS notifications provide more detail earlier about when power will be shut off and when it is expected to be restored. We have also updated notifications based on feedback from customers in the Medical Baseline Program. This includes asking Medical Baseline customers to confirm receipt of our PSPS notifications, and informing them that to be sure they are warned about an impending PSPS event, we will send a representative to the customer's place of residence if they do not confirm that they have received a PSPS notification.

For the PSPS event under way this week, affecting 171,433 customers and 10,241 Medical Baseline Customers, PG&E initiated customer notifications on Saturday September 5, and as of today confirmed that 96.9% of those Medical Baseline customers received our automated or individualized follow-up notifications.



We have also partnered with a variety of CBOs to assist customers with medical needs before, during and after PSPS events. CBOs' activities include:

- Collaborating with the CFILC through the Disability Disaster Access and Resource Program to support the Access and Functional Needs (AFN) community, including:
 - Portable backup power
 - Accessible transportation
 - Hotel rooms
 - Food stipends
- Working with Meals on Wheels and local food banks to provide meals to seniors and low-income customers during events.
- Expanding materials available to customers to include American Sign Language (ASL)
- Providing education information on PSPS, emergency preparedness and our Medical Baseline Program at community events and targeted presentations to AFN stakeholders.

PG&E also established an advisory group called the People with Disabilities and Aging Advisory Council (PWDAAC) and worked with California's other investor-owned utilities to establish the Statewide AFN Advisory Council. These groups work with associations and agencies to identify needs and co-create solutions for customers with medical needs and disabilities and our aging customers.

In-Language and Related Community Outreach: An update on your company's outreach and relationship-building with people and communities in farmworker communities where prevalent languages such as Hmong, Mixteco, Yaqui and Triqui are spoken.

We are collaborating with multicultural media organizations and CBOs in our service territory to provide in-language services. This summer, we identified and are currently establishing contracts with over 40 multicultural-media partnerships and CBOs to supplement our translations, including indigenous languages spoken by customers that occupy significant portions of California's agricultural economy. In particular, we're going to work with six CBOs to provide emergency preparedness, education and PSPS notifications to the following indigenous languages:

- Chatino
- Nahuatl
- Chinanteca
- Katz el
- Maya
- Mixteco
- Tlapaneco
- Triqui
- Zapoteco

This collaboration is in addition to the in-language efforts to translate our website, outreach preparedness materials, and event notifications. We have established a fully multi-lingual emergency website that mirrors the English site. For this week's PSPS event, the website is delivering information in in six languages, in addition to English.

The below table summarizes the timing of deployment for specific languages that will be available on our emergency website and event notifications:



Currently Available	Planned for September 2020	Planned for October 2020
1. Spanish	7. Arabic	13. Portuguese
2. Chinese (Mandarin & Cantonese)	8. Punjabi	14. Hindi
3. Vietnamese	9. Farsi	15. Thai
4. Tagalog	10. Japanese	
5. Russian	11. Khmer	
6. Korean	12. Hmong	

This summer, we met with multicultural media organizations to ask that they cross-promote our language services, so that customers with limited English proficiency can anticipate how to obtain event information in their language.

Further, we have a webpage in English, and all 15 languages, that describes our language support services for customers. This includes how to set their language preference, confirming expectations for translated notifications, and clarifying actions customer can take if they receive PSPS event notifications in English. This page will be live on our website later this month and we will promote it with multi-cultural media organizations and CBO partners to share with their constituents.

And to further broaden our reach, we will continue to share PSPS event information with a variety of multi-cultural media outlets. The progress made related to our translations is more described in our September AFN Progress Report to the CPUC.

The decision to de-energize lines is not a responsibility we take lightly. We understand the burden we impose on our customers when deciding to call a PSPS is only amplified during the COVID-19 pandemic. Given this, we are reducing PSPS events' impact on customers without compromising safety.

We appreciate the opportunity to provide additional information on the improvements we have made -- and are continuing to make -- this year for the safety of our customers and communities. Thank you.

Sincerely,

LAURIE GIAMMONA

Senior Vice President and Chief Customer Officer

cc: Service Lists for R.18-12-005 and I.19-11-013

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