

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

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

R.18-12-005
(Filed December 13, 2018)

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
2022 PUBLIC SAFETY POWER SHUTOFF PRE-SEASON REPORT**

(PUBLIC VERSION)

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July 1, 2022

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In compliance with California Public Utilities Commission Public Safety Power Shutoff (PSPS) Order Instituting Rulemaking Phase 3 Decision (D.) 21-06-034 and PSPS Order Instituting Investigation D.21-06-014, San Diego Gas & Electric Company (SDG&E) hereby submits this 2022 Public Safety Power Shutoff (PSPS) Pre-season Report (Attachment A hereto). This report follows the template provided by the Commission's Safety and Enforcement Division (SED).

SDG&E hereby provides the following link to access and download the Pre-Season Report Tables Excel workbook (Appendix D) and other files to its 2022 PSPS Pre-season Report: <https://www.sdge.com/PSPS>.

Respectfully submitted,

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Attachment A

**San Diego Gas & Electric Company
2022 Public Safety Power Shutoff Pre-Season Report**

SDG&E 2022 Public Safety Power Shutoff Pre-Season Report

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Section I – Authorities

1. All reporting plans concurrently required to be included in the (current year) Pre-Season Report herein, must be produced in a single document submitted by each electric investor-owned utility. Specifically, these include the community resource center plan (A.1, A.3, and A.6), critical facilities plan (B.2), PSPS Exercise Reports (C.2), education and outreach-related surveys and accessibility efforts and associated costs (E.1, E.2 and E.3), and notification plan (I.3). The (current year) Pre-Season Report must also include the following items of information:
 - a. Description of lessons learned from past PSPS events, including feedback from impacted customers and stakeholders, and how the electric investor-owned utility has applied such lessons to its current and future efforts in preparation for the upcoming wildfire season.
 - b. Identify circuits at greatest risk of de-energization during the upcoming wildfire season. Include the number of times each circuit was de-energized during the prior four calendar years, and describe all steps toward risk-reduction and de-energization mitigation for each circuit, including specific outreach and education efforts and efforts to identify and provide appropriate resiliency support to customers with access and functional needs on each circuit.
 - c. Annual reports, as applicable, required by Ordering Paragraphs 8, 21, 27, 30, 33, 36, 38, 41, 46, 47, 51, and 57 of D.21-06-014.

Section II – Community Resource Center Plan

1. Each IOU must provide an updated annual Community Resource Centers (CRC) plan as Appendix A. (D. 21-06-034, Appendix A at p. A14, Section K - 1; SED Additional Information.)

SDG&E’s Community Resource Center (CRC) Plan is included as Appendix A.

2. The IOUs must provide a list of all CRCs available in the IOUs’ service territories in advance of wildfire season. (ESRB-8, p.5, Section II.2.A; D.20-05-051, Appendix at p. 5&6, Sections d; SED Additional Information.)

See “Table 1 – List of Available Community Resource Centers” in Appendix D.

3. The annual CRC plan must detail how the utility will provide the services and supplies required to serve Medical Baseline (MBL) and AFN populations as recommended by regional local government, Advisory Boards, public safety partners, representatives of people/communities with access and functional needs, tribal representatives, senior citizen groups, business owners, community resource organizations, and public health and healthcare providers. In the annual CRC plans, the utilities must set forth the specific recommendations made by the above-noted entities, whether the utilities adopted the recommendation (or did not adopt the recommendation), the reason it was adopted (or not adopted), and the timeline for implementation. The IOUs must provide a summary table of stakeholder recommendations on AFN needs for services and supplies. If an adopted recommendation is not completed in the current reporting

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period, it should be carried into future annual reporting period(s) until it is finished or no longer relevant. (D.21-06-034, Appendix at p.A1, Section A-3; SED Additional Information.)

See “Table 2 – Stakeholders’ CRC Recommendations on AFN Needs” in Appendix D.

4. **The IOU CRC plan must include prior year CRC usage metrics. (D.21-06-034, Appendix at p. A1, Sections A-6.)**

See “Table 3 – Prior Year PSPS CRC Usage Metrics” in Appendix D.

5. **The IOU CRC plan must include a prior year CRC customer feedback summary. (D.21-06-034, Appendix at p. A1, Sections A-6; SED Additional Information.)**

See “Table 4 – Prior Year CRC Customer Feedback” in Appendix D.

6. **The IOU CRC plan must include prior year CRC challenges faced when setting up and operating CRCs. (D.21-06-034, Appendix at p. A1, Sections A-6.)**

See “Table 5 – Prior Year IOU CRC Challenges” in Appendix D.

Section III – Critical Facilities and Infrastructure Plan

1. **Each IOU must provide an updated Critical Facilities and Infrastructure (CFI) plan as Appendix B. (D. 21-06-034, Appendix A at p. A14, Section K - 1; SED Additional Information.)**

SDG&E’s Critical Facilities and Infrastructure Plan is included as Appendix B.

2. **The IOUs must include a list of critical facilities and infrastructure within the utility’s service area. The list must be posted in the IOUs’ PSPS web portal with restricted access to confidential information. (D.21-06-034, Appendix at p. A3-4, Sections B-1 and B-3; D.21-06-014, Ordering Paragraphs 21, 30, 33 & 57.)**

See “Table 6 – Critical Facilities and Infrastructure List” (**CONFIDENTIAL**) in Appendix D.

3. **The IOUs must include, in the CFI plan, the number of requests from customers to be designated as critical facilities and infrastructure in the current year and the prior year, whether the utility accepted or denied the request, and the reasons for any denial. (D.21-06-034, Appendix at p. A3, Sections B-2.)**

See “Table 7 – List of Requests to Be CFI Over Last Two Years” in Appendix D.

Section IV – PSPS Exercise Reports

1. **Each investor-owned utility must prepare and file a PSPS Exercise Report as part of the [current year] Pre-Season Report. These PSPS Exercise Reports must include, at a**

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minimum, provisions for both table-top (TTX) and functional PSPS exercises (FSE), how many PSPS exercises were held, the dates held, and what entities participated. (D.21-06-034, Appendix at p. A1, Sections C-2; SED Additional Information.)

See “Table 8 – PSPS Exercise Summary” and “Table 9 – List of Exercise Participated Entities” in Appendix D.

Please note that SDG&E will conduct an additional functional PSPS exercise in August 2022. In addition, SDG&E’s table-top exercise was conducted on June 27. Accordingly, will submit supplemental PSPS exercise reports for its June 27th and August 2020 exercises by August, 26, 2022 and September 30, 2022, respectively. SDG&E’s request for extension to has not been approved as of June 29, 2022.

2. **For each exercise, please provide the items below. (SED Additional Information.)**
 - a. **After-Action Report**
 - b. **What written materials (e.g., slides, instructions) do you provide to telecommunication carriers and other public safety partners during and after they participate in TTXs, FSEs or other trainings/briefings?**
 - c. **Please provide copies of the written materials and/or links to web-based information.**
 - d. **Indicate if this information is also posted in your public safety partner portal.**

The following documents are provided in Appendix F for the May 24-26 PSPS Notification Functional Exercise as a zipped folder titled “SDGE May 24-26 FSE Documents”.

- a. After-Action Report
- b. Telecommunication carriers received a real-time notification message, a link to the Public Safety Partner Portal with exercise scenario data, and a survey to complete.
- c. The Exercise Notification Message, a screenshot of the Public Safety Partner Portal with exercise data, and the partner survey are attached.
- d. The data that was available on the Public Safety Partner portal during the exercise was scenario data with impacted communities and estimated restoration time but is no longer available to ensure that SDG&E’s portal only contains relevant data during an actual PSPS event.

Please note that SDG&E will conduct an additional functional PSPS exercise in August 2022. In addition, SDG&E’s table-top exercise was conducted on June 27. Accordingly, will submit supplemental PSPS exercise reports for its June 27th and August 2020 exercises by August, 26, 2022 and September 30, 2022, respectively. SDG&E’s request for extension to has not been approved as of June 29, 2022.

Section V – Education and Outreach

1. **Each utility must conduct, at a minimum, two PSPS education and outreach surveys accessible to all customers each calendar year. The Commission’s Safety and Enforcement Division is authorized to direct an IOU to modify or issue more of these surveys. (D.21-06-034, Appendix at p. A7, Sections E-1; SED Additional Information.)**

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See “Table 10 – Survey Summary” in Appendix D.

For 2022, SDG&E will conduct a PSPS Pre-Season survey and PSPS Post-Season survey. The PSPS Pre-Season survey will be fielded in July and the PSPS Post-Season survey will be conducted in December. Considering approximately 14% of SDG&E’s customers base residing within the High Fire Threat District and the high risk of survey fatigue, SDG&E requests the Commission’s consideration to maintain the current requirement of a minimum of two surveys per year. Additionally, these surveys will be conducted in an accessible format to ensure an effective interface with accessible technology used by respondents when completing the survey.

2. The IOUs must provide copies of all PSPS education and outreach surveys templates. (D.21-06-034, Appendix at p. A7, Sections E-1; SED Additional Information.)

As of the time of this report, SDG&E is refining the templates for the 2022 PSPS Pre-Season survey to align with customer and stakeholder feedback from 2021. When the survey templates are finalized, SDG&E will be positioned to submit the fielded survey templates. A noteworthy mention is the 2022 PSPS Pre-Season Survey continues to mirror SCE and PG&E surveys ensuring joint IOU alignment. However, SDG&E provides the templates for the four surveys it conducted in 2021 (as also reflected in Table 10) as Appendix E.

3. The IOUs must provide the languages the education and outreach surveys were conducted in and assess if the in-language surveys meet the “prevalent” languages requirement as defined in D.20-03-004.

See “Table 10 – Survey Summary” in Appendix D.

The 2022 PSPS Pre and Post-Season surveys will be conducted in the 20 prevalent languages spoken in the service territory, plus Mixtec and Zapotec, which are not prevalent languages in SDG&E’s service territory, rather regulated languages. The prevalent languages in which the surveys will be administered are English, Spanish, Arabic, Armenian, Cantonese, Farsi, French, German, Hindu, Japanese, Khmer, Korean, Mandarin, Mixtec, Portuguese, Punjabi, Russian, Somali, Tagalog, Thai, Vietnamese and Zapotec. SDG&E also issues in-language surveys to customers based on the identified language preferences on the customers’ account.

4. Each IOU must collaborate with relevant community-based organizations and public safety partners to develop these surveys, which must include, at a minimum, metrics to evaluate whether the education and outreach is effectively helping communities and residents before, during, and after a PSPS event to plan for alternatives electricity arrangements and/or avoid the impacts of de-energization events. (D.21-06-034, Appendix at p. A7, Sections E-1.)

SDG&E has previously consulted with various statewide community-based organizations, through a meet and confer meeting, where the surveys were reviewed and approved. These surveys are in joint IOU alignment evaluating effectiveness before, during and after PSPS events. SDG&E has also solicited feedback from local Public Safety Partners and local CBOs, and responses are utilized to help shape the PSPS public education strategy.

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Additionally, the Company's formal PSPS post-season After-Action Review process also helped inform the Company's PSPS public education strategy.

Metrics currently used to measure effectiveness include customer satisfaction rate with the overall PSPS notifications received; Public Safety Partner satisfaction rate with notifications/communications received, and customers with Access and Functional Needs confirmed receiving PSPS notifications.

- 5. IOUs must include the results of the most recent education and outreach surveys not yet previously reported on, as an attachment to the [current year] Pre-Season Report and the [prior year] Post-Season Report. (D.21-06-034, Appendix at p. A7, Sections E-1.)**

SDG&E's most recent PSPS education and outreach surveys were reported in its 2021 Post-Season Report submitted on March 1, 2021, which can be accessed here:

<https://www.sdge.com/PSPS>.

- 6. IOUs must provide an evaluation of PSPS education and outreach effectiveness and the takeaways from the survey results for PSPS table 11 protocol improvements. (D.19-05-042, Appendix A p.A24; SED Additional Information.)**

The Wildfire Communications Survey was, conducted in September 2021, measured awareness of safety-related communications, sources of information, awareness of PSPS and emergency preparedness.

This survey included questions that allowed SDG&E to isolate responses of customers who identified as having AFN. SDG&E analyzed the responses, as well as compared to those of non-AFN households, to better understand their unique level of awareness, understanding and preparedness. Some of the analyzed findings include:

- Seniors are more aware of wildfire communications and the PSPS programs than younger respondents.
- Non- English speaking were ranked lowest for wildfire communication and will be an outreach focus in 2022
- Households with disabilities are generally better prepared than those without disabilities

The PSPS Post-Incident survey provided context for insights awareness and resources for individuals with AFN. Online surveys were employed in English and Spanish from 12/21/21 - 1/10/22. Of the 367 residential and small business customers surveyed:

- 302 respondents were notified of a potential PSPS, but power was not shut-off
- 64 respondents who experienced a shut-off indicated having a member of the household with a disability
- 52% of respondents with AFN who experienced a shutoff used at least one SDG&E resource
- 92% of individuals with AFN were able to use necessary medical equipment to maintain necessary life functions for the duration of an PSPS event that affected them.

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- 65% of individuals who utilized mitigation services reported they were satisfied with the level of support

7. Each IOU must report prior year costs for PSPS-related education and outreach in the format of the SED POSTRS3_Template_2021, or reference it if it has been provided in the prior post-season report. (D.21-06-034, Appendix at p. A7, Sections E-3 and K-1)

The 2021 costs for PSPS public education and outreach were provided in POSTR3 as part of SDG&E's 2021 Post-Season Report submitted on March 1, 2021, which can be accessed here: <https://www.sdge.com/PSPS>.

8. PG&E, SCE, and SDG&E are required to describe how it works, in advance of each wildfire season and during each wildfire season, with local jurisdictions, in a proactive manner, to identify and communicate with all people in a de-energized area, including visitors. This requirement is applicable to PG&E, SCE, and SDG&E only. (D.21-06-014, Ordering Paragraph 38.)

SDG&E Emergency Management team met with local jurisdictions in listening sessions to gather input and feedback to guide the development of our strategy to identify and communicate with all people. Many of the strategies included in the plan originated from these listening sessions and are consistent with strategies used by the local jurisdictions to communicate during local or regional emergencies.

SDG&E's public education campaign spans beyond the HFTD to the entire service territory.

Below are communication tactics used to inform customers of PSPS prior to wildfire season, coupled with the in-market timeframes. Some of these same channels are also leveraged during wildfire season.

- Print Advertising (Q2-Q4)
- Outdoor Advertising (Q3-Q4)
- Television/Radio Advertising (Q2-Q4)
- Digital Advertising (Q2-Q4)
- Paid Social Media (Q2-Q4)
- Organic (non-paid) Social Media (Q2-Q4)
- Paid Search (Q2-Q4)
- Customized AFN PSPS Campaign (Q2-Q4)
- Website and Video Updates (Q2-Q3)
- In-Studio Media Interviews (Q2-Q3)
- Strategic Story Pitching (Q2-Q3)
- Social Media (organic) – (Q1-Q4)
- Print Materials (Q2 – Q3)
- Direct Mailing
- Wildfire Safety Fairs
- Wildfire Safety Webinars

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In addition to tactics listed above below are additional tactics that are utilized during wildfire season and/or a PSPS (typically Q3-Q4).

- PSPS Notifications (customers, AFN, general public, Public Safety Partners, municipalities, CBOs and other stakeholders)
- SDG&E's webpage, SDGE.com and a dedicated PSPS webpage activated during a PSPS (sdge.com/ready). This landing page serves as a one-stop-shop resource for communications and updates during a PSPS
- SDG&E's PSPS app, Alerts by SDG&E
- SDG&E Newscenter (latest updates/real-time awareness during a PSPS and linked to sdge.com/ready)
- In-community signage (including roadside signs, marquis signage and community flyers)
- Partnership local broadcast media (TV, radio and print), including local emergency broadcast radio
- Message amplification by CBOs, Public Safety Partners and local Jurisdictions

2022 communication enhancements include:

- **Technology communication enhancements** to include the PSPS website SDGE Alerts (PSPS) mobile app refinement with increased accessibility and possible expansion. Public Safety Partner Portal refinement and supporting app.
- **Expansion of the multi-channel engagement and communications strategy** by community events, increased accessible communications, ongoing targeted outreach to individuals with access and functional needs.
- **Refine and expand the customer notification process** to include enhanced accessibility as well as refined and expanded messaging
- **Enhanced and customized tribal communications** based on feedback received from tribal surveys and in-community workshops. . .

SDG&E has been expanding resources available to customers prior to peak wildfire season, and during a PSPS. Messaging will be added to promote the following offerings.

- Prioritized Medical Device charging at Community Resource Centers
- Digital Assistant (Alexa) PSPS communications
- Increase access to backup power options to customers in the HFTD, including requests during PSPS events

9. **Each IOU must file information pertaining to, at a minimum, discussions at Working Group meetings regarding the accessibility of the utility's education and outreach efforts, including surveys, for individuals with access and functional needs, the recommendations, if any, made by individuals with or representatives of communities with access and functional needs to enhance education and outreach pertaining to PSPS events, and whether those recommendations, if any, were incorporated into the utility's PSPS protocols. (D.21-06-034, Appendix at p. A7, Sections E-2.)**

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SDG&E held its Q2 PSPS Working Group meeting on June 2, 2022 which included a review of SDG&E's accessible communications. Tools reviewed included accessibility enhancements to customer emergency notifications, website accessibility, Video Remote Interpreting capabilities for customer-facing employees to offer on-demand ASL translation and accessibility enhancements at Community Resource Centers. SDG&E filed its Q2 PSPSWG Report summarizing this working group and feedback provided with the Commission on June 24, 2022.¹

See "Table 11 – AFN Outreach Recommendations" in Appendix D.

10. PG&E, SCE, and SDG&E must include a detailed summary to substantiate all efforts to develop and implement, in advance of wildfire season, a communications strategy to rely on during a proactive de-energization when restrictions due to the power loss exist. This detailed summary must address how the utility worked in coordination with public safety partners to develop this communication strategy. (D.21-06-014, Ordering Paragraph 41.)

SDG&E believes a collective and customized approach to a communications strategy leads to more meaningful and successful outcomes. Our internal teams have different partnerships and relationships with stakeholders, which through a customer engagement mapping process supported through customer research, coupled with internal subject matter expertise has allowed us to develop a comprehensive communications strategy meaningful and relevant to each affected stakeholder, including messaging and preferred communication channel. Examples of such stakeholders include critical customer groups such as low-income, seniors, multi-cultural groups, hard to reach customers, customers with access and functional needs, tribal communities, public safety partners, critical facilities, city and state elected officials, residents and business in the areas of highest fire risk. These key stakeholder groups were paired with an internal subject matter expert team, and a plan was designed specific to each stakeholder group that could be reached through team such as marketing communications, community affairs, public affairs, emergency management, community resilience, customer programs or community outreach. This helps address the differences and preferences in every stakeholder group engaged by the Company's communication strategy.

SDG&E solicits stakeholder feedback before and after a PSPS to gather information on preferred communication messaging and tactics to help inform future campaigns. In addition to a public education campaign spanning beyond the HFTD to the entire service territory, SDG&E has also developed and implemented a detailed Crisis Communications Plan. The Crisis Communication Plan outlines the company's communication strategy, including diverse methods used, to reach and inform customers, media, employees and stakeholders during de-energization. A summary of the communication tactics used before, during and after wildfire season and/or a PSPS are listed below.

Below are the communication methods used to reach individuals residing in SDG&E's service territory in advance of wildfire season and their corresponding in-market timeframes.

¹ <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M489/K140/489140864.PDF>

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SDG&E also works with local media, journalists and trusted Community-Based Organizations (CBOs) to amplify messages.

- Print Advertising (Q2-Q4)
- Outdoor Advertising (Q3-Q4)
- Television/Radio Advertising (Q2-Q4)
- Digital Advertising (Q2-Q4)
- Paid Social Media (Q2-Q4)
- Paid Search (Q2-Q4)
- Customized AFN PSPS Campaign (Q2-Q4)
- Website and Video Updates (Q2-Q3)
- Review/Update PSPS Notifications (Q2-Q3)
- In-Studio Media Interviews (Q2-Q3)
- Strategic Story Pitching (Q2-Q3)
- Social Media (organic) – (Q1-Q4)
- Organic (non paid) Social Media (Q2-Q4)
- Print Materials (Q2 – Q3)
- Direct Mailing
- Wildfire Safety Fairs
- Wildfire Safety Webinars
- Direct meetings (face to face or online)

During a PSPS, SDG&E leverages more than 20 diverse communications platforms to reach the public. In addition to the items listed above that occur during Q3 and Q4 (includes SDG&E’s wildfire season) below are additional tactics that are utilized during wildfire season and/or a PSPS.

- In-Language PSPS Notifications (customers, AFN, general public, Public Safety Partners, municipalities, CBOs and other stakeholders)
- Dedicated website landing page during a PSPS ([sdge.com/ready](https://www.sdge.com/ready)). This is a central resource for communications and updates during a PSPS
- SDG&E Newscenter (latest updates/real-time awareness during a PSPS and linked to [sdge.com/ready](https://www.sdge.com/ready))
- In-community signage (including roadside signs and marquis signage) and flyer distribution
- Hyper local targeted messaging via Nextdoor
- Outreach to local broadcast media, including local emergency broadcast radio
- Updates, information and notifications via the PSPS mobile app
- Message amplification by local trusted CBOs and Public Safety Partners
- Dedicated Spanish media team to share vital information with Spanish local broadcast media.

SDG&E’s strategy is further outlined in SDG&E’s 2022 Crisis Communications Plan.²

² [https://www.sdge.com/sites/default/files/regulatory/2021 SDGE GO 166 Annual Report and Emergency Response Plan PUBLIC.pdf](https://www.sdge.com/sites/default/files/regulatory/2021%20SDGE%20GO%20166%20Annual%20Report%20and%20Emergency%20Response%20Plan%20PUBLIC.pdf)

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11. PG&E, SCE, and SDG&E must provide all methods used to promote operational coordination with public safety partners. (D.21-06-014, Ordering Paragraph 47.)

Operational coordination is achieved through a variety of efforts with our Public Safety Partners. The primary method is our 24/7 on-duty representatives. SDG&E maintains a 24/7 Emergency Management, 24/7 Liaison Officer, and 24/7 Fire Coordinator on-duty roster to ensure partners have a way to contact us for coordination. SDG&E also hosts partner Agency Representatives in our EOC and when appropriate embeds an SDG&E Agency Representative in our partners EOCs.

The sharing of situational awareness tools and resources as well as the regional collaboration efforts listed in Section V.12 below are additional methods SDG&E uses to promote operational coordination.

12. PG&E, SCE, and SDG&E must provide all methods used to work with public safety partners to improve responses to concurrent emergencies. (D.21-06-014, Ordering Paragraph 51.)

During a PSPS outage, there could be additional emergencies occurring at the same time (e.g., wildfires, capacity events). Below includes more information on how SDG&E works with Public Safety Partners to improve the response to concurrent emergencies:

Exercises: SDG&E conducted a Functional Notification exercise where notifications were sent to Public Safety Partners with links to update their contact information and review the Public Safety Partner Portal and view scenario data posted to the Portal. SDG&E will discuss coordination and procedures for unplanned outages, wildfires, and concurrent PSPS events during our Public Safety Power Shutoff TTX scheduled for June 27th. Public Safety Partners are invited to plan, observe and play in the exercise.

Incident Command System (ICS), Standardized Emergency Management System (SEMS) and National Incident Management System (NIMS) protocols: These nationally standardized emergency management protocols rely heavily on guidelines to manage concurrent emergencies. This includes coordinating with appropriate incident leaders through a chain of command during events and managing existing lines of communication through dedicated SDG&E Agency Representatives and other channels. This may include, but is not limited to conducting live calls to Public Safety Answering points (PSAP) or dispatch centers when SDG&E's EOC is first activated to inform them ahead of customers of a potential event, hosting daily Systemwide Cooperators Calls, where all Public Safety Partners in the service territory are invited to join and hear the latest event information, and embedding with local or state OES agencies or having agencies embedded in SDG&E EOC as circumstances warrant. SDG&E Agency Representatives who engage with Public Safety Partners received regular training and are well versed in emergency management systems.

Direct Engagement: Ahead of this PSPS season and during the 90-day requirement outlined in D.21-06-014, we hosted meetings to discuss concurrent emergency planning. We do not limit ourselves in having these conversations with Public Safety Partners within the 90-day

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requirement and have been proactively engaged in these discussions before the 90-day period.

Regional Coordination Efforts for non-PSPS Disasters: To ensure a coordinated and collaborative response to other incident types, SDG&E participates in the following regional efforts:

- Regional Lifelines Group, Co-Chair
- Southern California Catastrophic Earthquake Planning Committee
- Regional Fuel Planning
- Excessive Heat Planning
- Unified Disaster Council
- Statewide Election Planning with Secretary of State's Office
- Dam failure Planning
- Regional Hazard Mitigation Planning
- Regional exercises
- Regional Special Events Planning
- Regional PSPS Working Group

Situational Awareness Sharing: SDG&E has developed a number of situational awareness tools that are shared with our public safety partners:

- Mountain-top cameras (<https://www.alertwildfire.org/region/sdge>)
- SDGEweather.com (<https://sdgeweather.com/>) which includes real-time data of:
 - Fire Potential Index (<https://fpi.sdgeweather.com/>)
 - Wind speeds (<https://weather.sdgeweather.com/>)
 - Humidity
 - Temperatures
 - Link to individual weather station data
- Fire Weather Modeling Website (<https://wxmap.sdsc.edu/>)

Fire Weather Data Portal³: San Diego Supercomputer Center (SDSC) is ingesting and storing SDG&E datasets for fire weather and all post processed fire weather indices to include but not limited to the Fire Potential Index (FPI), Santa Ana Wildfire Threat Index (SAWTI), and fuels to enable findability and accessibility of these datasets for various stakeholders through web services and visual maps. Application Programming Interfaces (APIs) will enable time range or geolocation and tagged metadata-based querying as well as grouping and sub setting of datasets for context-driven use by authorized users. The map services will enable layering of these datasets for use in fire modeling.

³ <https://wifire-data.sdsc.edu/dataset?organization=sdge>

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Section VI – Notification Plan

1. **Each IOU must provide an updated annual PSPS notification plan as Appendix C. (D. 21-06-034, Appendix A at p. A14, Section K - 1; D.21-06-034, Appendix at p. A11, Section H-1 through Section H-9; D.21-06-014, Ordering Paragraph 41; SED Additional Information.)**

SDG&E’s Notification Plan is included as Appendix C.

2. **Each electric investor-owned utility must develop a notification plan jointly with Cal OES, public safety partners, county, tribal, and local governments, independent living centers, paratransit agencies, durable medical equipment vendors, agencies that serve individuals who receive Medi-Cal home and community-based services, and other organizations representative of all subsets of people or communities with access and functional needs. Each electric investor-owned utility must specifically describe its plans for notifications according to specific access and functional needs, for instance, the needs of persons with vision impairments as distinct from the needs of persons with a developmental disability. Each electric investor-owned utility must finalize its notification plan for inclusion in its [current year] Pre-Season Report. Provide a list of the joint efforts to develop the AFN population notification plan with the aforementioned stakeholders. (D.21-06-034, Appendix at p. A11, Sections H-3.) In addition, IOUs provide a list of AFN population subsets and notification plans including the following minimum fields.**

See “Table 12 – List of Joint Efforts on AFN Notification Plan” and “Table 13 – AFN Population Subset Notification Plan” in Appendix D.

3. **PG&E, SCE, and SDG&E must include a detailed summary of efforts to develop, in advance of wildfire season, notification and communication protocols and systems to reach all customers and communicate in an understandable, accessible manner. This detailed summary must include, at a minimum, an explanation of the actions taken by the utility to ensure customers understand (1) the purpose of proactive de-energizations, (2) the process relied upon by the utility for initiating a Public Safety Power Shutoff (PSPS) event, (3) how to manage safely through a PSPS event, and (4) the impacts on customers when a proactive power shutoff is deployed by the utility. This requirement is applicable to PG&E, SCE, and SDG&E only. (D.21-06-014, Ordering Paragraph 41.)**

Annually, SDG&E solicits feedback from customers and stakeholders regarding PSPS messaging and communications. Research results are used to refine, enhance or add in-event notifications based on this customer and stakeholder feedback. An example is during the SDG&E’s 2021 post-season After-Action Review/Improvement Process we learned there was a need for customized notifications for customers transitioning on and off a microgrid. As such that notification type is being added to the 2022 suite of notifications.

Customer feedback indicated the need for a clear and understandable explanation of the PSPS process and corresponding customer experience. In response SDG&E produced a new

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animated video that explains the PSPS process including the considerations taken into account when making the decision to initiate a PSPS to ensure community safety through considerations necessitated for restoration. The PSPS Restoration Process video can be viewed through this link [SDG&E PSPS Process & Restoration](#).

SDG&E works with community partners and CBOs to amplify messaging and assist with providing resources and services during a PSPS. These partners refer customers and the public to PSPS preparedness safety pages on sdge.com, while directing individuals with AFN to call 211 for assistance. These website pages provide robust information about remaining resilient through a PSPS and provide helpful resources. Content on SDG&E's website is presented in an accessible format, including American Sign Language formatted videos.

In 2022, SDG&E will continue to engage with local broadcast media and utilize various mediums to reach the public, including AFN communities, and Limited English Proficient residents, to provide them with wildfire safety and emergency preparedness information, PSPS awareness and PSPS education. Project teams are collaborating with stakeholders and subject matter experts in accessible communications to explore additional platforms that can assist with accessible communications.

Section VII – PSPS Event Lessons Learned

- 1. IOUs must provide a list of all lessons learned from past PSPS events, including feedback from impacted customers and stakeholders, and explain how the IOU has applied such lessons to its current and future PSPS activities. If a responding action is not completed by the reporting cutoff date, it should be carried into future annual reporting period(s) until it is fully implemented or irrelevant. (D.21-06-034, Appendix at p. A14, Sections K-1.)**

See “Table 14 – PSPS Event Lessons Learned Summary” in Appendix D.

Section VIII – High Risk Circuits

- 1. IOUs should describe the methodology and criteria used to identify circuits at greatest risk of PSPS in the upcoming wildfire season. (D.21-06-034, Appendix at p. A14, Sections K-1.b SED Additional Information)**

SDG&E primarily used historical PSPS outage data to identify 16 at-risk circuits that had been de-energized for PSPS three or more times in a calendar year during the prior four calendar years (2018-2021). This is the same method used to identify frequently de-energized circuits as reported in SDG&E's 2022 Wildfire Mitigation Plan Update (WMP), Section 8.6. First, PSPS-related outages were grouped into larger PSPS events that coincide with the post-event reports. Then, impacted circuits were identified and counted only one time per event, regardless of the number of de-energizations for the event. For example, if a circuit was de-energized three times during one PSPS event, that circuit is only counted one time for that event. Once the data was collected, circuits that were impacted three times or more in a

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calendar year over the past four years were considered to be most at-risk for future PSPS events.

In addition to this primary methodology, SDG&E explored for the first time the use of its statistical risk models for assessing circuits that are at greatest risk of PSPS. A detailed overview of these models is reported in the 2022 WMP, Section 4.5.1. For each circuit, wildfire likelihood and consequence were estimated using the worst weather conditions observed in 2020. For wildfire likelihood estimates, the models reported in Table 4-17 of the 2022 WMP were used, which produced asset-level probabilities that were aggregated to the circuit level by summing. Wildfire consequence estimates were produced using the model reported in Section 4.5.1.3 of the 2022 WMP, which were then converted to unitless scores in accordance with the methodologies described in SDG&E's November 2021 PSPS post-event report. Consequence scores were also produced at the asset-level and were therefore aggregated to the circuit level by mean value. From the circuit-level likelihood and consequence scores, SDG&E reviewed each circuit that showed both high likelihood and high consequence scores and found general agreement with the circuits that saw frequent de-energization except for one circuit, which was subsequently added to the list of circuits at greatest risk of PSPS

A total of 17 circuits are reported in "Table 15 – High Risk PSPS Circuits" in Appendix D.

- 2. IOUs must include the number of times each circuit was de-energized during the prior four calendar years, and describe all steps toward risk-reduction and de-energization mitigation for each circuit, including specific outreach and education efforts and efforts to identify and provide appropriate resiliency support to customers with access and functional needs on each circuit. (D.21-06-034, Appendix at p. A14, Sections K-1.b; SED Additional Information.)**

See "Table 15 – High Risk PSPS Circuits" in Appendix D.

PSPS events can have negative customer impacts and should be limited as much as feasible to the specific areas that are experiencing the extreme risk. This is especially important for critical facilities providing firefighting resources and life-saving services for individuals with AFN who may require medical devices to be powered 24 hours a day, seven days a week. SDG&E initiates PSPS events as a last resort mitigation during extreme weather conditions, utilizing other tools to mitigate PSPS risk.

SDG&E's grid hardening programs are aimed at reducing wildfires caused by utility equipment and minimizing impacts to customers from mitigations such as PSPS. Details of these programs can be found in SDG&E's 2022 Wildfire Mitigation Plan Update, section 7.3.3. Specifically, there are three grid hardening programs that have had the greatest impact on PSPS risk reduction and customer impact on the 17 at-risk circuits identified in Table 15: sectionalizing enhancement program, strategic undergrounding, and customer generator programs.

Sectionalizing Enhancement Program

To mitigate PSPS risk, the PSPS Sectionalizing Enhancement Program installs switches in strategic locations, improving the ability to isolate high-risk areas for potential de

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energization. Switches are installed on circuits that have significant sections underground, allowing customers with this lower-risk infrastructure to remain energized during weather events. SDG&E also combines weather stations with sectionalizing devices to de-energize only sections of circuits that are experiencing extreme wind events.

Historical PSPS data is used to identify and prioritize locations for switches. This typically means installing switches in the HFTD, however, as recent weather patterns have become more extreme and widespread, switches are placed in both the HFTD and the wildland urban interface. SDG&E will continue the PSPS Sectionalizing Enhancement Program using data from any additional PSPS events with the goal of reducing PSPS impacts using the most relevant data.

Over the 3-year period of 2020 to 2022, the PSPS Sectionalizing Enhancement Program has the potential to reduce PSPS impacts by a total of 28,147 customers. Because sectionalizing customer savings vary due to weather-dependency and resulting differences in switch plans, the effectiveness of this mitigation is estimated to be 50 percent.

Strategic Undergrounding

Strategic undergrounding converts overhead systems to underground, providing the dual benefits of nearly eliminating wildfire risk and the need for PSPS events in these areas. This program is deployed in the HFTD as well as in areas where substantial PSPS event reductions can be gained through strategic installation of underground electric system. The effectiveness of undergrounding was measured by taking total CPUC-reportable ignitions associated with underground and dividing by total ignitions. Based on this analysis, strategic undergrounding is expected to reduce ignitions per year by 0.192 and mitigate PSPS impacts to 7,192 customers by the end of 2022.

Over the next 10 years, strategic underground scope will significantly increase as the understanding of costs and constraints improve. Installations in the HFTD remain challenging due to difficult terrain, environmental constraints, permitting timelines, and acquisition of easements. SDG&E also hopes to facilitate productive engagement with stakeholders in the telecommunication field to streamline resources and obtain more support for undergrounding efforts. Lessons learned from each year's undergrounding accomplishments will help alleviate these constraints through process improvements and stakeholder engagement.

Generator Programs

The category "Generator Programs" consists of three programs: Generator Grant Program (GGP), Standby Power Program (SPP), and Generator Assistance Program (GAP). These three programs ensure backup power is provided to customers most vulnerable to PSPS events in the form of portable battery units with solar charging capacity (GGP), fixed installation backup generators, temporary critical facility generators, or solar panel and backup battery system (SPP), or point-of-sale rebates for portable generators (GAP).

These three programs prioritize their outreach and education to customers in Tier 3 of the HFTD, followed by customers in Tier 2. The GGP focuses on the needs of MBL and life support customers in addition to other customers with AFN who have experienced a PSPS outage. The SPP targets customers and communities that will not directly benefit from other

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grid hardening programs due to their location and regions that are fed by circuits with higher historical PSPS impacts. The GAP focuses on resiliency for all customers who reside in the HFTD and may be impacted by PSPS events. Eligible customers are proactively contacted and educated about these programs.

Although these generator programs alleviate PSPS for the participating customers, these customers are still included in the total number of customers de-energized during a PSPS event since SDG&E cannot guarantee that the generator is being used during the de-energization.

Covered Conductor

Covered conductor is a widely accepted term to distinguish from bare conductor. The term indicates that the installed system utilizes conductors manufactured with an internal semiconducting layer and external insulating ultraviolet-resistant layers to provide incidental contact protection. The Covered Conductor Program has the potential to raise the threshold for PSPS events to higher wind speeds compared to bare conductor hardening; however, as of the end of 2021 the threshold for PSPS events has not been raised on any circuits with covered conductor installed as there have not yet been any circuit segments fully hardened with covered conductor. For this reason, this program has not been included in Table 15 for the 2022 PSPS season.

Education and Outreach

SDG&E customers and the general public are affected by wildfires, which are now a nearly year-long presence in California. Customers and the general public who are not educated about wildfire safety, emergency preparedness, and resiliency may be ill-prepared for a wildfire or a PSPS event.

To mitigate this risk, SDG&E's comprehensive wildfire safety public education and outreach plan was developed with the intent of increasing community resiliency to wildfires and mitigating the impact of PSPS events. The plan is divided into 3 phases: prior to, during, and following a wildfire or PSPS event. Communication efforts before a wildfire focus on educating customers and the public about the measures and programs being implemented to reduce the threat of catastrophic wildfires, tactics they can employ to remain resilient and safe, and the community resources available. During a wildfire related event, real-time awareness and updates about the event are provided along with information on how to remain safe and vigilant and the community resources available through the end of the event. After a wildfire, SDG&E examines communications and solicits customer and stakeholder feedback with the intent of refining and improving communication efforts.

SDG&E's wildfire and PSPS education and outreach efforts are focused in the HFTD but expand to the entire service territory. The 17 at-risk circuits identified in Table 15 are all located within the HFTD, therefore all education and outreach programs listed in section V apply to these circuits.

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Section IX – Others

- 1. PG&E, SCE, and SDG&E must provide, with the following minimum fields, the dates/times when the Joint Utility Public Safety Power Shutoff Working Group (JUPSPSWG) convened and the webpage links to all meeting reports filed with the Commission. (D.21-06-014, Ordering Paragraph 8)**

See “Table 16 – JUPSPSWG Meetings” in Appendix D. Note, the November 2021 report was erroneously named “Report of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) Regarding August 18th, 2021 Meeting of the Joint Utility Public Safety Power Shutoff Working Group, Pursuant to Ordering Paragraph (OP) 4 of Decision 21-06-014” and should have been named “Report of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) Regarding November 15th, 2021 Meeting of the Joint Utility Public Safety Power Shutoff Working Group, Pursuant to Ordering Paragraph (OP) 4 of Decision 21-06-014”

- 2. PG&E, SCE, and SDG&E must identify the status of the list of public safety partners, including the last date updated, on their Public Safety Power Shutoff webpages. (D.21-06-014, Ordering Paragraph 27.)**

SDG&E updates the Public Safety Partner list quarterly with the last update occurring on May 24, 2022. The process of updates is an email to all partners in the database which includes a link to an online survey where partners can enter a primary, secondary, and tertiary contact for their organization. Additionally, the email includes a link to the Public Safety Partner Portal instructing them to login to ensure their account is active and they remember their credentials.

- 3. PG&E, SCE, and SDG&E must confirm that the utility (1) contacted its Medical Baseline customers, at least annually, to update contact information; (2) sought to obtain from Medical Baseline customers, at least annually, an alternative means of contact for Public Safety Power Shutoff (PSPS) events; (3) contacted all customers that use electricity to maintain necessary life functions, at least annually, to update contact information; and (4) sought to obtain from these customers that use electricity to maintain necessary life functions, at least annually, an alternative means of contact for PSPS events. Provide the IOU’s protocol on maintaining the Medical Baseline customer contact list and the electricity reliance customer contact list in a timely manner. The maintenance protocol should include the steps, the staffing, and the deadlines to achieve the objectives. (D.21-06-014, Ordering Paragraph 36.)**

SDG&E can confirm that it contacts its Medical Baseline customers at least annually to update contact information and/or provide an alternative means of communication through program eligibility renewal process and through other communication efforts. SDG&E plans to send a letter or email to encourage Medical Baseline customers in the high fire threat districts to update their contact information. Additionally, My Account customers can self-update their contact information at any time by logging into their account on sdge.com or by contacting SDG&E’s customer care center.

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Given that customers can update their contact information via My Account or by contacting SDG&E's customer care center, SDG&E does not have a maintenance protocol for maintaining the Medical Baseline customer contact list. However, SDG&E plans to explore developing a maintenance protocol in the future.

Appendix A – F

Appendix A

Community Resource Centers Plan

San Diego Gas & Electric Company's Community Resource Center Plan

July 1, 2022



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I. Community Resource Center Objectives

The Community Resource Center (CRC) program objective is to provide temporary support to communities impacted by public safety power shutoffs (PSPS) through the provision of basic resources, absent electricity. Basic resources offered include but are not limited to access to water, snacks, ice, seating, water for livestock/animals, and a place to charge cell phones/medical devices all while receiving up-to-date event-specific information. The final objective is to ensure resources are provided in a safe environment.

II. CRC Strategies, Actions, and Timing

SDG&E established its CRC program in 2018, following customer feedback indicating additional resources were lacking during a PSPS. Residents requested information and the ability to charge cell phones so they could stay in communication. SDG&E embarked upon identifying ideal locations that satisfied the needs of the most PSPS vulnerable customers utilizing the following criteria:

- Community historical PSPS impacts
- Community location to nearest available resources
- Physical site characteristics
 - o Adequate space for the community served
 - o Proper egress routes and safety considerations
 - o Facility electrical configuration can support a backup generator
 - o ADA compliance/accessibility
- Located in the High Fire Threat District (Tiers 2 or 3)
- Availability of community support
- Ability to operate during the required hours

Pending satisfaction of the above requirements, SDG&E initiates full site inspection and CRC design. Following the 2018 pilot year of the CRCs, SDG&E enhanced the program through incorporating feedback received from residents. For example, one of the initial sites was re-located based on community input. SDG&E also learned that residents in Tier 3 of the HFTD were often reliant on well-water and needed access to water for their large animals. As a result, SDG&E now offers water buffalos, that provide large quantities of water.

Figure 1: Map of SDG&E's Current Brick-and-Mortar CRCs



Each site is located at a fixed facility designed to comply with local electrical code and safety considerations, which includes appropriate permitting with the local authority having jurisdiction. Prior to breaking ground, SDG&E enters into an agreement with the facility owner or customer of record. The agreement illustrates the roles and responsibilities of each party, resources provided, maintenance requirements, compensation, construction terms, and liability. Once fully executed, construction begins until the site is fully operational, leveraging electrical equipment capable of safely disconnecting the facility from the utility grid to facilitate a portable backup generator and eliminate the risk of a back-feed scenario. In some instances, a facility may already possess a permanently installed backup generator, in which case SDG&E would enter into an agreement strictly for participation, compensation, liability, roles and responsibilities.

When conditions warrant activation of a CRC, SDG&E takes immediate action to ensure resources are made available to impacted communities. The general strategy for activation follows the PSPS timeline as outlined on SDG&E's PSPS website, but more specifically, CRC planning goes into action immediately following the issuance of a weather forecast that indicates any chance of adverse weather, which may fall within the 7 – 2 days ahead timeframe. 48 hours ahead, the CRC team is establishing shift coverage and mobilizing resources to ensure we are prepared and flexible to

support the needs of the anticipated event. 24 hours ahead, potentially activated sites are narrowed down and ready for the coming activities. The day of activation coincides with the first de-energization. If the de-energization takes place overnight, CRCs will be opened the following morning at 8am. If the de-energization takes place during the day, SDG&E will make every effort to open a CRC as soon as possible and will maintain the standard operating hours of 8am – 10pm.

III. CRC Contracting Effort in Place to Ensure Sufficient Contracted CRC Available During PSPS Events

SDG&E maintains annual contracts across all eleven permanent CRC locations. These contracts are renewed annually and are reviewed periodically to ensure accuracy as the program evolves. Contained within each contract are provisions to ensure sites are made available to SDG&E when requested, physical access is provided as needed, and permission is granted to inspect, install, and maintain necessary electrical equipment to facilitate backup power during PSPS events.

IV. Engagement with Local Populations on Access and Functional Needs (AFN)

As a result of community meetings held in communities in SDG&E’s service area, SDG&E established a network of CRCs to help communities in real-time during Public Safety Power Shut-offs.

SDG&E is active in customizing and enhancing its Safety and AFN Public Education campaign in 2022. This territory-wide, mass-market communications effort aims to achieve increased customer awareness and education. The paid advertising campaign, in combination with direct communications and outreach, supports SDG&E’s ability to reach its AFN audience broadly and promote message consistency across the service territory.

Outreach tactics supporting the public education campaign include community events such as wildfire safety fairs and webinars, direct outreach to vulnerable populations in high-risk areas, collaboration with community-based organizations (CBOs) to provide support, promotional communications for support services such as generator programs and resiliency surveys, emails to customers, bill inserts, wildfire safety newsletters and wildfire-related customer notifications in accessible formats.

Additionally, SDG&E leveraged its Public Safety Power Shutoff Working Group (PSPSWG) with representatives from the California Public Utilities Commission (CPUC), communication providers, water service providers, tribes and agencies that serve members with disabilities, aging, and AFN population to solicit feedback on the 2022 Community Resource Center Plan in early June of 2022.

V. Stakeholder Recommendations on AFN Needs of Services and Supplies

SDG&E consulted with various stakeholder groups in the development of this plan through e-mails,

and virtual conference calls as well as the PSPSWG. Feedback received during those sessions has been incorporated and SDG&E will continue to refine the program through ongoing dialogue with CRC stakeholders. See “Table 4 – Prior Year CRC Customer Feedback” in Appendix D of SDG&E’s 2022 Pre-Season Report.

SDG&E has coordinated with each CRC site-facility owner on Americans with Disabilities Act (ADA) compliance and has provided additional accessibility and safety items in “AFN Go Kits”. These Go Kits include items to mitigate trip hazards, communication aids, additional accessibility and directional signage, and materials to expand accessible parking and provide safe paratransit loading zones. Privacy screens are available to provide a private area for sensitive activities like administering medications, breastfeeding, a calming area for sensory disabilities and other needs.

Additionally, SDG&E has leveraged key takeaways from Cal OES’s Inclusive Planning Blueprint for Addressing Access and Functional Needs at Mass Testing/Vaccination Sites. SDG&E has implemented Video Remote Interpreting (VRI) resource and training to all CRC staff, allowing for complex conversations and information sharing in ASL and non-English languages. Each CRC will also have non-English visual translator boards for simple and casual conversations. SDG&E will ensure all CRC staff are familiar with possible reasonable accommodation requests and know to refer such requests to SDG&E’s Emergency Operations Center (EOC) AFN Liaison Officer for solution support.

VI. Criteria Used to Determine the Types of CRCs Needed During Each Event

Depending on the most recent CDC guidelines regarding Covid-19 protocols and public gatherings, in-door or drive-thru layouts for CRC’s are utilized at brick-and-mortar locations. Should one of the eleven brick-and-mortar CRC locations prove inadequate relative to community needs, one of three SDG&E Mobile Command Trailers can be dispatched to a desired location serving as a temporary CRC.

VII. Services and Supplies Available at each CRC to Customers and AFN Populations

In order to determine the resource needs of the community being served, SDG&E leveraged feedback from its impacted communities via townhalls, safety fairs and wildfire/PSPS preparedness workshops. The common themes were outage updates, cell phone charging, and air conditioning. Additionally, AFN stakeholders recommended adding the ability for individuals to drop-off medical devices for charging with the ability to pick up later. Based upon these discussions and feedback received, SDG&E has added additional resources to its CRCs. Below describes the full and current list of resources available at SDG&E’s CRCs.

- Up-to-date outage information
- Bottled water
- Light snacks
- Bulk water truck delivery (for larger quantities of water for animals/pets)
- Ice (both block and cubed)

- Accessible Restrooms
- Cell phone charging stations
- Wi-Fi/Access to internet
- Medical Device Charging
- Brick and mortar facility fully powered via a portable backup generator
 - o This enables standard 120V charging via facility electric outlets for medical or other devices requiring power

SDG&E continues to evaluate the effectiveness of the resources offered through feedback forms available at activated CRCs. The above list reflects new items incorporated as a result of direct feedback.

VIII. CRC Information Transparency and Accessibility on PSPS Webpage and PSPS Advanced Notification During Event

CRC information is made available through SDG&E’s dedicated PSPS website (sdge.com/ready), and smart device application SDG&E Alerts. Additionally, 211 helps direct individuals with AFN to available CRC locations and CBOs promote this information to their constituents.

IX. COVID-19 Considerations

The CRC program has developed a comprehensive COVID-19 plan that may exercise two phases of health and safety precautions depending upon the nature of the event and prevailing guidelines. This section summarizes the plan at a high level:

Phase 1 – Strict social distancing measures with added security involvement and routine deep cleaning of all commonly touched surfaces. Employees and CRC partners will use proper personal protective equipment (PPE) such as face coverings and gloves. Routine temperature checks for anyone entering a CRC will be required at entryways. Strict time limits will be implemented to eliminate any congregating or social gathering.

Phase 2 – If conditions warrant more stringent health and safety precautions that would render Phase 1 precautions futile, CRCs would transition to drive-thru events. No entry to the CRC building would be allowed except for building owners and SDG&E employees. Care packages would be pre-assembled and handed to vehicles in a drive-thru fashion. All PPE identified in Phase 1 will be leveraged here as well.

X. Prior Year CRC Usage Metrics

See “Table 3 – Prior Year PSPS CRC Usage Metrics” in Appendix D.

XI. CRC Program Evaluation Including Customer Feedbacks, CRC Related Surveys, Survey Results, Survey Evaluation, and IOU's Related Challenges

Starting in 2022, SDG&E has contracted a third-party vendor to provide personnel during a PSPS event for its various CRCs. IPads will be used to conduct a four to five question survey to collect customer feedback.

See “Table 4 – Prior Year CRC Customer Feedback” and “Table 5 – Prior Year IOU CRC Challenges” in Appendix D.

XII. Lessons Learned Protocol

The After-Action Review (AAR) is the primary tool for identifying, documenting, and incorporating PSPS event-related decisions and actions of events into the continuous process and quality improvement and learning cycle. Immediately following a PSPS event resulting in pre-event customer and regulatory notifications, SDG&E initiates efforts to engage in the sharing of best practices and lessons learned to assist in relevant lessons learned sections of the Commission's Safety and Enforcement Division's standardized 10-day post-event reporting template.

Findings and/or lessons learned resulting from the AAR process or other methods of incident evaluation are identified and documented and shall be stored in the approved repository and made available to employees, as appropriate. Feedback and/or lessons learned applicable and relevant to all Investor-Owned Utilities (IOUs) from concluded PSPS events may be shared at the utility working group meetings or other Commission led meetings.

To the extent permissible under legal privilege and confidentiality claims, corrective actions resulting from the AAR process shall be broadly communicated to impacted workgroups, operational teams, and management, as appropriate to promote continuous improvement and a learning organization.

See “Table 14 – PSPS Event Lessons Learned Summary” in Appendix D.

Appendix B

Critical Facilities and Infrastructure Plan

San Diego Gas & Electric Company's Critical Facilities and Infrastructure Plan

July 1, 2022



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I. Critical Facilities and Infrastructure (CFI) Objectives

To ensure critical facilities and critical infrastructure customers can adequately prepare for Public Safety Power Shutoffs, SDG&E endeavors to identify and understand the resiliency needs of all facilities that are essential to public safety, health, and the wellbeing of our communities. This is accomplished through an iterative and ongoing identification and outreach process intended to ensure all CFI customers have provided SDG&E with up-to-date emergency contact information, assessed their resiliency and emergency action plans, and identified accounts that may require backup generation.

II. CFI Strategies, Actions, and Timing

SDG&E's primary goal for Critical Facility and Infrastructure customers is to ensure that all CFI customers are identified, have provided SDG&E with up-to-date emergency contact information, assessed their resiliency and emergency action plans, and identified accounts that may require backup generation.

This process is iterative and ongoing. SDG&E has utilized a 3-pronged approach to identify CFI customers; (1) Querying relevant NAICS codes, (2) internal recommendations from assigned customer service representatives, (3) customer requests to be classified as CFI.

Initial identification of CFI customers was conducted by utilizing the general NAICS code of each customer and grouping them into sections based on the required CPUC defined customer bases. These can be found in detail in "*Section III: CFI Definition and IOU CFI Contact on PSPS Website.*" This list is reviewed frequently to ensure customers who may not have been captured are notated and customers who may have been included erroneously are removed.

Through monthly reconciliations of SDG&E's customer information system to identify accounts that may have been opened or closed by CFI customers and keeping close relationships with assigned CFI customers to one of SDG&E's account executives, SDG&E is able to maintain an updated database of emergency contacts and understand specific customer needs throughout the year. Additionally, a robust annual outreach to all CFI customers allows SDG&E to make meaningful updates on customer backup generation and annual emergency plan assessments.

Each year, SDG&E conducts its annual outreach to all CFI customers between the beginning of May and the end of August to ensure all updates are made before the historical start of fire-season in San Diego and Orange County, around September 1st. This is performed in 3 distinct phases: (1) passive outreach via generic letters or emails inviting customers to complete an online survey, (2) active outreach via phone calls or personalized emails from assigned account representatives, and (3) in-person visits to CFI customers in the tier 2 and 3 high fire threat districts for those customers who have not yet completed the annual outreach. CFI customers who do not respond to any aspect of this outreach are notated and frequent attempts to update the contact information continue throughout fire season and beyond. Should a customer not provide this information, any contact information held within SDG&E's customer information system is utilized as the method of last resort to contact customers if they are identified to be impacted by an imminent PSPS.

SDG&E also maintains a CFI specific website at <https://www.sdge.com/pmps-critical-facilities> where customers can request the data that SDG&E currently has on file and request updates at any time. This request form is actively monitored by SDG&E staff for timely responses.

III. CFI Definition and IOU CFI Contact on PMP Website

SDG&E has followed the guidance of the CPUC on which customers should be classified as Critical Facility and Infrastructure customers.¹ This list can be found on SDG&E’s designated Critical Facilities and Infrastructure website, <https://www.sdge.com/pmps-critical-facilities> and is also included below:

Critical Facility Customer Types

Emergency Services Sector

- Police Stations, Fire Stations, Emergency Operations Centers, Public safety answering points, Tribal Government providers.

Government Facilities Sector

- Schools, Jails and Prisons, Homeless Centers, Community Centers, Senior Centers, Independent Living Centers, as defined by the California Department of Rehabilitation, voting centers and vote tabulation facilities., and government agencies essential to national defense

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 (excluding doctor offices and other non-essential facilities), Cooling (or Warming) Centers, Temporary facilities established for public health emergencies.

Energy Sector

- Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, community choice aggregators, interconnected publicly-owned utilities and electric cooperatives.

Water and Water Waste Sector

- Facilities associated with the provision of drinking water or processing of wastewater including facilities used to pump, transport, store, treat and deliver water or wastewater.

Communications Sector

- Carrier infrastructure including selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites.

¹ The term “Critical Facilities & Infrastructure” was initially defined by the CPUC in D.19-05-042 and subsequently modified in D.20-05-051 and D. 21-06-034 to add more sectors. D.20-05-051, p A10 and D.21-06-034, pp. 75-76, A5-A6.

Chemical Sector

- Facilities associated with the provision of manufacturing, maintaining, or distributing of hazardous materials and chemicals

Food and Agriculture Sector

- Food banks and Emergency Feeding Organizations, as defined in 7 U.S.C. § 7501

Transportation Systems Sector

- Facilities associated with automobile, rail, aviation, major public transportation, and maritime transportation for civilian and military purposes, and Traffic Management Systems

SDG&E has also employed a distribution list for an internal CFI contact by creating a shared email address CFInquiry@sdge.com. This email address is monitored by multiple SDG&E staff members to ensure that requests are addressed in a timely manner. This approach was determined a best practice as it provides redundancy in case employees are on vacation, out of the office on customer visits, unable to access email requests within 24 hours of the request or other reasons that may cause an email to go unread.

Throughout the reporting period for the 2022 Pre-Season Report of June 1, 2021, through May 31, 2022, approximately 1 email was received from an outside source requesting data validation.

IV. Identification Method of CFI

SDG&E utilizes a 3-pronged approach to identify CFI customers; (1) querying relevant NAICS codes, (2) internal recommendations from assigned customer service representatives, and (3) customer requests to be classified as CFI.

SDG&E has primarily utilized NAICS codes for the first and broadest classification effort. This includes identifying the relevant NAICS codes for each category outlined by the relevant CPUC decisions and referenced in *Section III: CFI Definition and IOU CFI Contact on PSPS Website*.² These NAICS codes then received a specific flag in SDG&E's customer information system to ensure that the customer has been appropriately identified and can be contacted to gather the necessary information in case of an imminent PSPS. This process is continuously refined, and customers are added or removed based on further assessment of their classification. This flag also helps SDG&E capture any new accounts that are added or removed monthly from the customer's account list so further outreach can be conducted to identify new backup generators, changes in contact information, or unique needs of the customers that need to be considered.

SDG&E also conducts a thorough outreach campaign between June 1-August 31st each year to all CFI customers to ensure any changes that may have not been communicated from the customer is captured. This includes a large mailing, e-mail, phone call, and in-person visits to survey customers on their emergency preparedness, capability for resiliency, and presence as well as efficacy of their

² The term "Critical Facilities & Infrastructure" was initially defined by the CPUC in D.19-05-042 and subsequently modified in D.20-05-051 and D. 21-06-034 to add more sectors. D.20-05-051, p A10 and D.21-06-034, pp. 75-76, A5-A6.

backup generation.

This process is iterative and ongoing as new information comes to light as to how these customers should be identified.

V. Changes in CFI Since Prior Annual Report

There have been no changes as this is the first annual pre-season report. However, as of May 31st, 2022, SDG&E has 19,829 unique CFI accounts.

VI. Maintenance and Update Process of CFI List

See “*Section II - CFI Strategies, Actions, and Timing.*”

VII. Collaboration with Transmission-level Customers

SDG&E’s transmission level customers primarily consist of energy generators and each of SDG&E’s transmission level customers have been flagged as CFI. See “*Section II - CFI Strategies, Actions, and Timing.*”

VIII. Comparison of Current Year CFI Request Total with Last Year

SDG&E received no requests for customers to be classified as Critical Facilities during the 2021 reporting timeline. This will also be referenced in “*Table 7 – List of Requests to Be CFI Over Last Two Years*” Appendix D.

IX. CFI Backup Power Assessment Efforts/Actions, Backup Power Provisions and Terms

SDG&E conducts an annual assessment of all CFI customers which helps SDG&E to better understand the customers’ emergency preparedness and customers that may need additional support during PSPS events.

In 2021, SDG&E formalized its outreach to all CFI customers by standardizing a questionnaire that had two goals; (1) Identify the sites with backup generation and (2) better understand the customers who may need additional support. The initial survey for 2021 included the following questions:

1. Do you have a preparedness plan in the event you lose grid power?
2. Do you have a pool of generators that can be shared amongst various facilities?
3. Do your critical accounts have satisfactory backup generation?
4. If you answered yes to previous question, is the backup generator permanently installed (not portable)?
5. For any permanent backup generators, what is the fuel source?

6. What is the estimated run time of your generators?
7. SDG&E is exploring future offerings to assist critical facilities during PSPS events. Which of these would help you with emergency planning?
8. Do you need SDG&E to provide any additional consultation, including technical assistance, to ensure your organization has satisfactory backup generation? (Select all that apply)
 - a. Deeper knowledge of PSPS events: how PSPS events are determined, updates during events, and knowing how long they'll last
 - b. Understanding on what it would take to maintain power if the grid is not available
 - c. Better understanding of critical circuits within the facility. How much power is needed to sustain operations in a PSPS event
 - d. Installation process of permanent backup power: knowing what technologies to implement, what contractors are reputable, and estimated disruption during installation
 - e. Subsidies to pay for resiliency measures/cost off set through rate relief / financing
9. Do you have any additional comments about how SDG&E can help your business prepare for fire risk related power outages?

For 2022, the survey of the CFI customers will continue to triangulate which accounts are of most concern and further identifies where permanent backup generation is available, allowing SDG&E to focus on the areas that are of most concern to customers. The survey for 2022 will include the following questions:

1. Do you have an emergency preparedness plan in place in the event that you lose grid power?
2. Please identify the addresses where permanent backup generation is installed. (*Please select the boxes that apply*)
3. Do you have access to portable generators or backup battery supplies that can be shared amongst various facilities?
4. Please identify the addresses where backup power is needed during an outage, but unable to be installed. (*Please select the boxes that apply*)
5. Do you need SDG&E to provide any additional consultation, including technical assistance, to ensure your organization has satisfactory backup generation?

These new questions allow SDG&E the opportunity to identify the areas that are able to withstand long-term outages as a result of PSPS events, identify CFI customers who may not have adequately prepared for PSPS, and identify addresses and accounts that due to issues with logistics are unable to utilize backup generation which provides SDG&E valuable information on sites that may not be able to withstand long-term outages.

SDG&E has also communicated to CFI customers that it is their responsibility to adequately prepare for PSPS events, which also includes an assessment of backup generation as a method of resiliency. It is SDG&E's perspective that it is ultimately the customers responsibility to prepare for emergencies where power is not available for long durations, and because of that it is SDG&E's position to inform customers that "SDG&E does not provide emergency backup generation". However, in the event of a situation where health, life, or safety of the community is at risk due to not

having access to backup generators, SDG&E has generators on hand with varying nameplate ratings from 25kW to 1000kW, and contracts with local third party vendors for rental units available to deploy. Because of this potential, SDG&E has developed a thorough process for when a customer requests backup generation.

During a PSPS event, customer's requesting backup generators will likely be working directly with their assigned Account Executive (AE). The AE will require the customer to fill out the Generator Request Form. Customers will then submit the completed request form back to their assigned AE and the AE will send the completed request form to the Emergency Operations Center (EOC) on-duty representatives. For unassigned customers who do not have an assigned AE would utilize SDG&E's Customer Call Center to request the backup and initiate the process. Whether through the assigned AE or through the Customer Call Center, these requests will be directed to the Customer Services EOC team.

This request will need to be approved by three individuals: (1) The Business Services on-duty EOC representative for initial review, (2) SDG&E's on-duty Distributed Energy Resources (DER) Manager who will allocate the back-up generation resources and confirm availability, and (3) the Customer Services Branch Chief on-duty. Finally, SDG&E's on-duty Incident Commander will review the request and if approved, will send to the appropriate County liaison for final approval.

If the request has been approved, the Business Services on-duty EOC representative will communicate to the customer, coordinate the delivery of the generator and update the assigned AE. This will be communicated to the DER manager for completion.

If the request was not approved, the Business Services on-duty EOC representative will note the reasoning in the request form and notify the customer that the request was not approved and update the assigned AE.

X. Engagement with Local Government and Public Safety Partners on CFI Identification and Back-up Generation Need

SDG&E conducts annual outreach to local and tribal government customers to assess their specific backup generation capabilities and identify problem areas. See "*Section IX. CFI Backup Power Assessment Efforts/Actions, Backup Power Provisions and Terms*" for the list of survey questions and process.

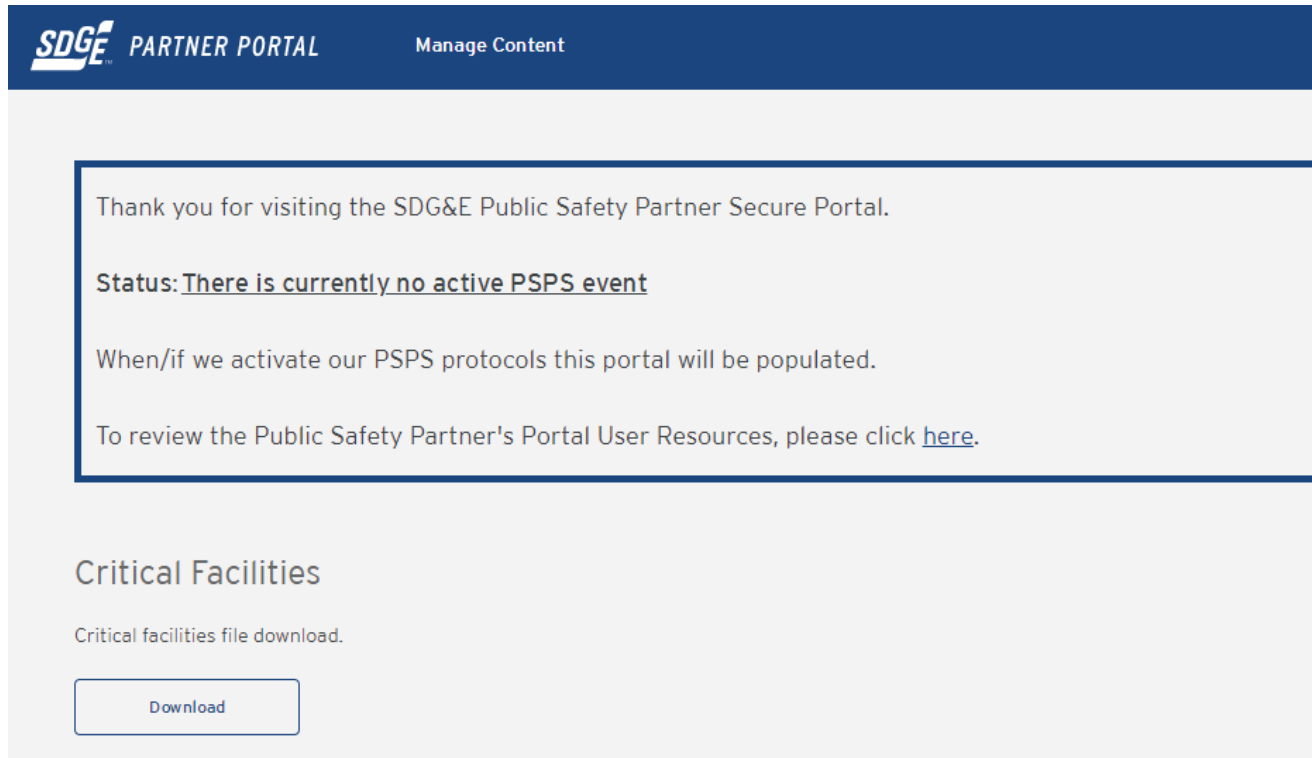
SDG&E also always makes the CFI list available to Public Safety Partners via the Public Safety Partner portal and will work with any local or tribal government to make revisions or additions to the CFI list based on the suggestions of the jurisdiction. This process is outlined in "*Section XI. Maintenance and Accessibility of CFI List*".

XI. Maintenance and Accessibility of CFI List

SDG&E has implemented a robust process for both Critical Facility and Infrastructure customers and Public Safety Partners to access SDG&E's CFI list as described below. Maintenance of the CFI list is outlined in detail in "*Section II. CFI Strategies, Actions, and Timing.*"

For Public Safety Partners, accessing the Public Safety Partner Portal will yield two separate results of how to request the SDG&E’s list of CFI customers. These are delineated between when the portal is activated during a PSPS event and when the portal is inactive when there is no current PSPS event.

Outside of a PSPS activation, SDG&E’s Public Safety Partner Portal will indicate “*There is currently no active PSPS event*” and provide a link that prompts the user to download the critical facilities file list as evidenced by the screenshot below.



During a PSPS activation, SDG&E’s Public Safety Partner Portal includes a link for “Critical Facilities and Infrastructure List” within the “Resource Materials” section of the secure portal as evidenced by the screen shot below.

Column 2 Headline
Resource Materials

B I U 🔗 ☰ ☰

[Training materials](#)
[Social Media Kit](#)

URL: <https://www.sdge.com/verify-critical-facilities> Edit | Remove

[Critical Facilities & Infrastructure List](#)

For Critical Facilities and Infrastructure customers that are not designated as a Public Safety Partner, on <https://www.sdge.com/psps-critical-facilities> under the “*For More Information:*” section and under the “*Confirm you Critical Facilities Information*” there is a link to a web form for the customer to input their information.

Within this form, the user can begin the process to verify their critical facilities contacts, request to make changes to the data currently held on file or, if the user is a Public Safety Partner, request the full list of Critical Facilities data. The process of confirming and validating the customer is outlined below. The instructions state, “*SDG&E is encouraging critical facility customers to ensure SDG&E has the most up-to-date emergency contact information for your organization.*”

Step 1: SDG&E will verify the data you provide in the form below for your facility.

Step 2: After SDG&E has verified the data entered, you will receive an email from us showing the current contacts. You will also have the opportunity to make updates to ensure that the proper people at your organization are getting emergency notifications.”

The user will then input their name, phone number, email, the customer’s name as it appears on their SDG&E bill, and any additional comments that will be helpful for our processing team to help fulfill the request.

Once the user has clicked “*Submit*”, an email with the information the user has provided will be sent to an internal distribution list for response. Once this is received, the SDG&E internal team will confirm that the customer is able to receive the data, contact the customer, and provide them with the information that is currently on file. Any changes that the user requests will then be made within SDG&E’s internal system and a confirmation of the changes will be provided to the requestor.

This process provides confidentiality by ensuring that the requestor is a representative of the entity for which the requestor is requesting data. Data will not be provided to the customer unless their email signature is affiliated with the entity for which the requestor. If the email address is not affiliated, SDG&E will coordinate with the entity that the data has been requested about before providing any data.

XII. Consultation with Local and Tribal Governments

SDG&E will provide the full CFI list to local and tribal governments upon request by the jurisdiction. Additionally, the full CFI list is available on the Public Safety Partner portal at any time for local and tribal governments to review the list of customers who have been flagged as CFI. Please see “*Section XI: Maintenance and Accessibility of CFI List*” for how this is completed. As tribal government providers and local governments are classified as CFI, please see “*Section II - CFI Strategies, Actions, and Timing*” for how SDG&E collaborates and notifies local and tribal government customers.

XIII. Coordination with CFI to Maintain Energization During PSPS Events of Varying Lengths

As California’s climate conditions have changed, the traditional idea of a fire “season” has evolved into a year-long battle against stronger, faster wildfires. SDG&E has spent more than a decade to build a wildfire safety program that includes fire hardening infrastructure, building a fire science and meteorology department to better forecast and prepare for wildfires, and implementing innovative technology such as weather stations, camera networks, drones, and fire prediction modeling to watch for potential threats.

Even with the investments to reduce the risk of wildfire, there are times where SDG&E may have to shut off the power to specific electric circuits to ensure that flying debris does not make contact with power lines and cause an ignition.

CFI customers are provided additional notifications to actively prepare for a PSPS event. During the event CFI customers who have provided emergency contact information are notified via ENS system of updates to the status of the outage for their specific device.

For Assigned CFI customers and Public Safety Partners, the customers are granted additional support and communication directly from their assigned Account Executive or can access the Public Safety Partner Portal.

CFI customers are surveyed annually on their backup generation capabilities to ensure that their critical operations can continue during PSPS of varying lengths. For any critical customers who may need to request backup generation for extended outages, they can follow the backup generator request process as outlined in “*Section IX: CFI Backup Power Assessment Efforts/Actions, Backup Power Provisions and Terms*”.

XIV. Lessons Learned Protocol

The After-Action Review (AAR) is the primary tool for identifying, documenting, and incorporating PSPS event-related decisions and actions of events into the continuous process and quality improvement and learning cycle. Immediately following a PSPS event resulting in pre-event customer and regulatory notifications, SDG&E initiates efforts to engage in the sharing of best

practices and lessons learned to assist in relevant lessons learned sections of the Commission's Safety and Enforcement Division's standardized 10-day post-event reporting template.

Findings and/or lessons learned resulting from the AAR process or other methods of incident evaluation are identified and documented and shall be stored in the approved repository and made available to employees, as appropriate. Feedback and/or lessons learned applicable and relevant to all Investor-Owned Utilities (IOUs) from concluded PSPS events may be shared at the utility working group meetings or other Commission led meetings.

To the extent permissible under legal privilege and confidentiality claims, corrective actions resulting from the AAR process shall be broadly communicated to impacted workgroups, operational teams, and management, as appropriate to promote continuous improvement and a learning organization.

See “*Table 14 – PSPS Event Lessons Learned Summary*” in Appendix D.

Appendix C
Notification Plan

San Diego Gas & Electric Company's Notification Plan

July 1, 2022



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Attachment 1 – SDG&E PSPS Notifications Matrix

I. Notification Objectives

Notification timelines and audiences are prescribed by the CPUC. To ensure the timelines are met, the objectives of this plan are as follows:

- Develop strategies to ensure timely notifications are made as prescribed;
- Promptly acknowledge the incident with a commitment to provide stakeholders more information;
- Speak with one voice to provide a consistent message to all stakeholders;
- Be transparent by proactively offering a continuous stream of updated, relevant information;
- Reach all stakeholders by communicating across every possible channel; and
- Tell our story leveraging visual communications and third-party support to help tell that story.

II. Notification Strategies, Actions, and Timing

In any crisis or disaster, following are the key strategies and actions in developing an emergency communications strategy:

- Complete a thorough damage/situation/injuries assessment.
- Appoint a lead point person for both crisis management and crisis communications.
- Determine executive availability and identify media spokespeople at both the executive and management levels.
 - Determine the appropriate spokespeople for different events (e.g., media briefings, media updates, one-on-one interviews).
- Develop a communications response strategy.
- Create a strategy and action plan for communicating with the customers, media and employees throughout the crisis.
- Develop key talking points, including core message themes that potentially can be carried forward throughout the crisis. Include facts that reflect the status of the crisis and the company's response, as well as proactive steps taken by the company.
- Consult with Legal and the Executive Incident Commander, as well other relevant internal departments, to approve messaging.
- Determine most effective media channel(s) (i.e., radio (particularly KOGO), TV, newspapers and/or social media) given the nature of the situation.
- Develop news releases/media statements and employee updates (via e-mail, employee hotline, company intranet, digiboards, and/or voicemail) as necessary.
- Use of social media to help broaden communications reach. If media briefings are necessary, activate media check list which includes identifying a suitable briefing room or area clear of the incident area and procure necessary A/V equipment; arranging escorts for media within the building, to and from the media briefings; coordinating with facilities and security on guest parking and access.
- Monitor ongoing media coverage and respond/adjust messaging as appropriate.
- Schedule regular updates for the crisis management team/EOC to share feedback from the media and other key stakeholders; discuss next steps in communications.

- Develop a PIO Section staffing schedule immediately for any crisis expected to require 24/7 response for the duration of the EOC activation.

Please see attachment 1 for details on the notification timeline.

III. Notification Process Planning and Improvement

SDG&E has developed a Notification Concept of Operations (ConOps) that lays out the processes & procedures for notifications Public Safety Partner Shutoffs (PSPS). That plan is reviewed annually and updated by the following activities:

- Updates to regulatory notifications
- Lessons learned from After-Action Review corrective actions
- Changes to internal processes

IV. Updated/Current Notification script and templates

SDG&E developed notification scripts for the various phases of the PSPS timeline. These scripts are updated annually based on feedback from customer surveys and feedback. SDG&E is in the process of updating its PSPS notification scripts for 2022. SDG&E's current notification scripts are the ones used during its November 24-26, 2021 PSPS event. For current notification scripts, please reference SDG&E's Nov 24-26 PSPS post-event report, Appendix 1.¹

Upon final review and approval of notification script, it is sent to Deaf Link for conversion into accessible formats such as video ASL translation with audio of the message and accessible transcript for access by screen reader, and braille refresh reader devices. The notification is simultaneously being translated into transcripts in 21 prevalent languages in the SDG&E Service Territory.

V. In-language Translations

SDG&E translates PSPS notifications into American Sign Language (ASL) video and 21 prevalent languages. Those languages include:

1. Spanish
2. Mandarin
3. Tagalog
4. Vietnamese
5. Russian
6. Korean
7. Cantonese
8. Arabic

¹ <https://www.sdge.com/sites/default/files/2022-05/R1812005%20SDGE%20PSPS%20Post-Event%20Report%20Nov.%2024-26.pdf>

9. French
10. German
11. Armenian
12. Farsi
13. Japanese
14. Khmer
15. Thai
16. Hindu
17. Portuguese
18. Punjabi
19. Somali
20. Mixtec
21. Zapotec

VI. Notification Methods

PSPS notifications are delivered using a multi-channel strategy to educate and inform customers and the general public. Methods include:

- Messages magnified via our regional partners, community-based organizations, and broadcast media partners, including designated local emergency broadcast radio station.
- Customers can receive notifications via our Enterprise Notification System (email, text and voice), and SDG&E’s PSPS app - “Alerts by SDG&E”. The app is available to customers and the general public.
- In-Community signage such as portable roadside signs and community marquees

Public safety partner notifications are delivered via text, email, and phone depending on the audience type and preference. Additionally public safety partners have access to SDG&E’s Public Safety Partner Portal for information.

VII. Meeting Notification Timeline Requirements

SDG&E has developed an automated timeline flow process to ensure notifications are completed as prescribed. This flow process sends an email to the appropriate SDG&E EOC responder reminding them to send the notifications.

VIII. Entity Responsible for Notifications

Notifications to the various audiences are conducted by the following personnel within SDG&E:

- Planning Section Chief
 - First Responders
 - Federal, State, and Local partners

- Fire Agencies
 - Law Enforcement Agencies
 - Emergency Medical Response Agencies
 - Emergency Managers
 - Emergency Facilities
 - CalOES
 - CAL FIRE
- Regulatory Officer
 - CPUC
- Liaison Officer
 - Tribal partners
 - Water / Wastewater Agencies
 - TelCom Agencies
 - CCAs
 - Publicly owned utilities
 - Federal, State, Local Elected Officials
 - Chambers of Commerce
 - CERT Groups
 - Fire Safe Councils
 - Community Planning Groups
- Customer Service Section Chief
 - Residential Customers
 - Business Customers
 - Critical Infrastructure Agencies
- AFN Liaison
 - PSPS AFN Partners
 - AFN Community Based Organizations

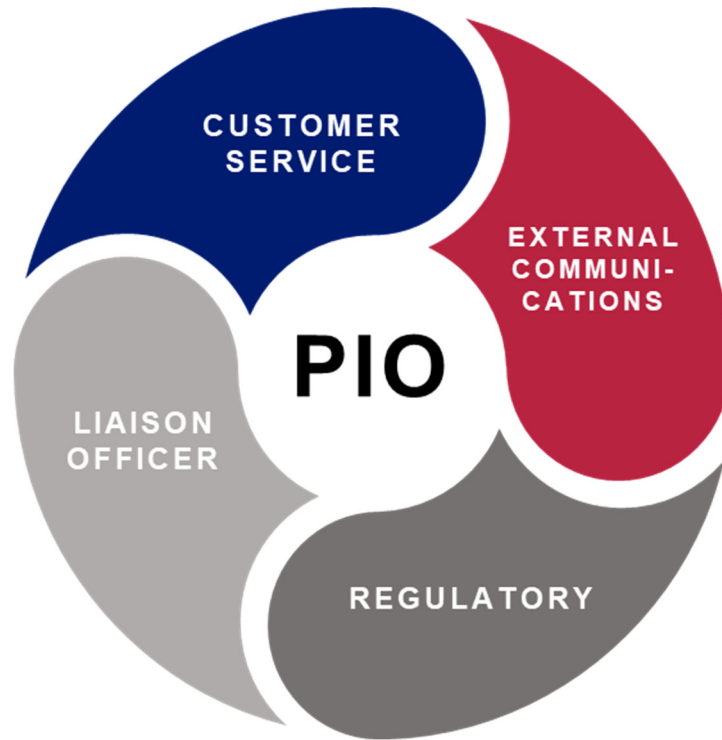
Please see attachment 1 for additional details.

IX. Consistency of PSPS Notification Information Across all Platforms

Due to the Company’s ample geographic service territory and employee interaction and communication with various stakeholders including the media, customers, community-based organizations and elected officials, it is essential that the sharing of information and communications are coordinated to ensure valid, aligned and consistent “OneVoice” incident messaging.

The Public Information Officer (PIO) Section is responsible for providing timely and accurate information to the news media and employees. Information is disseminated through traditional news outlets, social media outlets and internal communication platforms. SDG&E uses the “OneVoice” communications strategy for all internal/external stakeholders to ensure consistent, accurate and timely messaging throughout a PSPS.

Figure 1: SDG&E OneVoice Communications for Incident Response



X. Coordination with Stakeholders

Thoughtful pre-season planning and coordination to identify, inform and serve the needs of AFN populations during a PSPS occurs year-round with Community Based Organizations (CBO) that support and serve this population. Identifying AFN service providers, seeking their advice, sharing information and best practices, and facilitating solutions to meet customers’ needs during a PSPS are all part of the pre-season coordination with AFN Stakeholders.

Operational coordination is achieved through a variety of efforts with our AFN CBO Partners. The primary method is our 24/7 on-duty representatives. SDG&E maintains a 24/7 AFN Liaison Officer, in the Emergency Operations Center (EOC) to ensure AFN CBO partners have a direct link to SDG&E for information and coordination of PSPS support services.

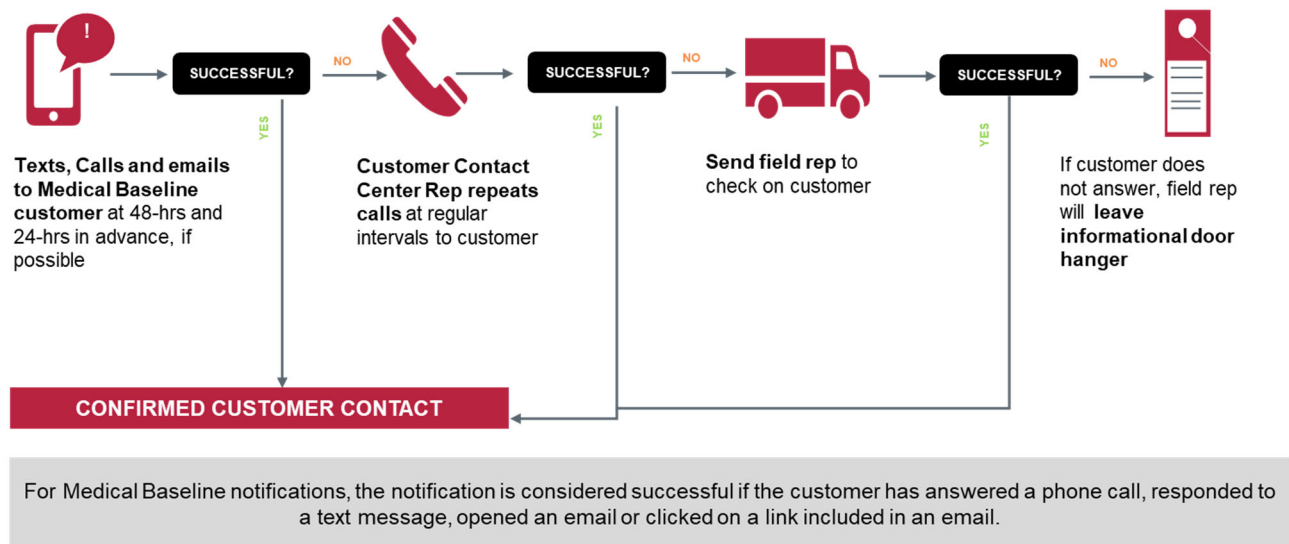
Additional coordination efforts between IOU’s may be found in “Table 12 – List of Joint Efforts on AFN Notification Plan” in Appendix D

Coordination with public safety partners is also key to achieving operational coordination and synchronized messaging.

XI. Affirmative Notifications to MBL Populations and Any Self-identified Vulnerable Populations

SDG&E performs positive notification procedures with all affected Medical Base Line (MBL) customers to ensure receipt of PSPS notification. Notifications are initially sent via automated outbound calls. If the system does not confirm the phone was answered by a person, additional attempts to contact the customer by phone are made by Customer Contact Center Representatives. If a Customer Contact Center Representative is unable to contact the customer by phone, a Customer Service Field Representative is sent to the customer’s home to deliver the notification. If no person answers the door, a notification door hanger is left for the customer. Please refer to the graphic below for a visual representation of SDG&E’s process to ensure all MBL customers receive an affirmative notification.

Figure 2: SDG&E MBL Affirmative Notification Process



XII. Notification Strategies on AFN Population Subsets

All SDG&E PSPS, Wildfire and Load Curtailment notifications are fully accessible for the sensory disabled and are translated into the 21 prevalent languages within the SDG&E service territory. Every notification has been recorded as a video of an ASL interpreter signing the notification, with an English voice over and an accompanying screen and braille refresh reader accessible transcript of the notification. Through the Accessible Hazard Alert System (AHAS), SDG&E provides ad-hoc real time accessible notifications with these same features.

SDG&E works closely and communicates informational, preparedness and real time event notifications to an expansive AFN CBO partner coalition to amplify notifications through trusted agencies with the AFN community. This coalition includes Residential Care Facilities, Social Service agencies, AFN and medical support organizations.

An extensive marketing campaign is conducted to solicit the cooperation of multi-family properties

with elevators, and master-metered Mobile Home Park owners and managers to educate and notify tenants of how to prepare for a PSPS, where to find real time information and services and sign up for PSPS notifications.

SDG&E ensures all affected Medical Baseline customer households receive a positive notification contact of PSPS notifications by sending a Customer Service Field Representative to their home if telephone contact is not achieved.

See “Table 13 – AFN Population Subset Notification Plan” in Appendix D.

XIII. Public Warning of PSPS Events Such as Week-ahead Forecasts

SDG&E utilizes numerous digital channels to promulgate public warning of PSPS events well in advance. Every business day the Fire Discussion authored by a degreed meteorologist is updated at 0600 to warn of potential conditions that could warrant a PSPS within seven days. This information is posted on sdgweather.com, the Fire Science and Climate adaptation app (FSCA), and the new SDG&E Alexa skill. For most of the year, users will read the following message at the end of the fire discussion, “Conditions that generally warrant a PSPS event are not forecasted for the next seven days.”

However, when a potential PSPS is forecast to occur within seven days due to forecasted deteriorating fire weather conditions, this information will be reflected in the fire weather discussion and with a “stoplight” warning graphic that will become activated on the home page of sdgweather.com indicating normal in green, PSPS watch in yellow, or PSPS warning in red. The PSPS watch is a forecast indicating that PSPS is probable, whereas the PSPS warning indicates PSPS is imminent due to dangerous fire weather conditions. This same graphic will be replicated and prominent on sdge.com as well.

XIV. Notification Cancellation

When there is an-all clear because the weather condition risk no longer exist, the message below is sent to customers via phone call, text and email. Notifications are also pushed through SDG&E’s PSPS App. Additionally, the Next Door social media platform is also used for notification amplification to affected zip codes.

“This is SDG&E calling with an important message. Press any key to continue. Adverse weather conditions have passed in your area. If you received a previous notification about a potential Public Safety Power Shutoff, you are no longer at risk of losing power. For more information, visit sdgenews.com. Thank you for your patience.”

A similar message is also sent to public safety partners if their jurisdictions are either no longer potentially affected, or they are no longer a potentially adjacent jurisdiction.

XV. Transmission-level Customer Notification

PSPS notifications to transmission-level customers follow the same timelines and content as other PSPS customer notifications.

XVI. Impacted Customer Information Available to Public Safety Partners from Outset of PSPS

SDG&E provides information by community for potentially impacted and impacted customer counts on its public safety partner portal with breakdowns of medical baseline and critical infrastructure counts.

Upon request, jurisdiction or tribal partners may have access to medical baseline customer information as outlined in Figure 3 below. SDG&E has established a process for jurisdictional and tribal partners to request the data which includes a secure file transfer protocol to protect the customer privacy.

Figure 3: Process to Request Detailed Customer Information



XVII. Secure Portal for Public Safety Partners

In compliance with CPUC requirements, SDG&E has developed a secure public safety partner portal. The portal consists of various features to better serve our partners during a PSPS event. Features include:

- One Source
 - Alert banner with important messages
 - Streamlined consistent data and messages
 - Outage data listed by community with the ability to drill down by sectionalizing device status
 - Shape file map with status polygons
 - List of critical facilities & critical infrastructure

- Secure
 - Near Real-time GIS information requires double authentication
- Information Sharing
 - The ability to copy info from the portal and share it with key staff
- Resources
 - List of open CRC locations
 - Social media kits
 - Community flyer
 - Talking points
 - Customer information:
 - Link to public website
 - Customer center call center 24/7 number
 - Link to download Alerts by SDG&E customer mobile app
- 24/7 Contacts
 - Direct links to call Liaison and Emergency Management
- Partner Input
 - Portal features were informed by Public Safety Partner feedback and focus groups

Enhancements to the portal are currently in development with the new version being released September 1, 2023, which includes the addition of a partner mobile app. Training for the enhanced portal will be conducted mid-late August.

XVIII. Lessons Learned Protocol

The After-Action Review (AAR) is the primary tool for identifying, documenting, and incorporating PSPS event-related decisions and actions of events into the continuous process and quality improvement and learning cycle. Immediately following a PSPS event resulting in pre-event customer and regulatory notifications, SDG&E initiates efforts to engage in the sharing of best practices and lessons learned to assist in relevant lessons learned sections of the Commission's Safety and Enforcement Division's standardized 10-day post-event reporting template.

Findings and/or lessons learned resulting from the AAR process or other methods of incident evaluation are identified and documented and shall be stored in the approved repository and made available to employees, as appropriate. Feedback and/or lessons learned applicable and relevant to all Investor-Owned Utilities (IOUs) from concluded PSPS events may be shared at the utility working group meetings or other Commission led meetings.

To the extent permissible under legal privilege and confidentiality claims, corrective actions resulting from the AAR process shall be broadly communicated to impacted workgroups, operational teams, and management, as appropriate to promote continuous improvement and a learning organization.

See “Table 14 – PSPS Event Lessons Learned Summary” in Appendix D.

Attachment 1

SDG&E PSPS Notifications Matrix



Responsible Party	Sector	Partner	Pre-Notifications					Emergency Notifications							Restoration
			First Notification	72-48 Hours At least by 48 Hr	48-24 Hours At least by 24 Hr	12 Hours EOC Activation	1-4 Hours	PSFS Decision	Overnight Message	Morning Power Out	Open CRC/CIC	Patrolling Begins	Patrolling Damage	Re-energization	EOC Deactivated
Emergency Management	First Responder + Public Safety Partners	Federal Public Safety	M13	M3	M5		M8			M11	M13	M14	M16	M17a	
	First Responder + Public Safety Partners	State Public Safety	M14	M3	M5		M8			M11	M13	M14	M16	M17a	
	First Responder + Public Safety Partners	Fire Agencies	M1a	M3	M5		M8			M11	M13	M14	M16	M17a	
	First Responder + Public Safety Partners	Law Enforcement Agencies	M1a	M3	M5		M8			M11	M13	M14	M16	M17a	
	First Responder + Public Safety Partners	Emergency Response Agencies / Emergency Managers	M1a	M3	M5		M8			M11	M13	M14	M16	M17a	
	First Responder + Public Safety Partners	Emergency Medical Service Agencies	M1a	M3	M5		M8			M11	M13	M14	M16	M17a	
	First Responder + Public Safety Partners	Emergency Facilities	M1a	M3	M5		M8			M11	M13	M14	M16	M17a	
	Public Safety Partners	CalOES	Form + call	Form	Form	Form	Form				Form	Form	Form	Form	
	First Responder + Public Safety Partners	Local Public Safety - County OES	Form + call	Form	Form	Form	Form	M8 (phone)			Form	Form	Form	Form	
														M17a (phone)	
Regulatory Officer	Public Safety Partners	CPUC	R1	R2	R3	R4		R5				R6	R7	R8	
	Public Safety Partners	CalFire - State	R1	R2	R3	R4		R5				R6	R7	R8	
	Transmission Partners	CAISO						M8							
	Transmission Partners	SCE						M8							
Liaison Officer	Local Jurisdiction Impacted	Local and tribal elected officials/city		M1a	M3	M5		M8			M11	M13	M14	M16	
	Local Jurisdiction Adjacent	Local adjacent jurisdictions		M1a	M3	M5		M8			M11	M13	M14	M17a	
	Public Safety Partners - Critical Customer	Water / Wastewater		M1a	M3	M5		M8			M11	M13	M14	M17a	
	Public Safety Partners - Critical Customer	Communication Service Providers		M1a	M3	M5		M8			M11	M13	M14	M17a	
	Public Safety Partners	Affected CCAs		M1a	M3	M5		M8			M11	M13	M14	M17a	
	Public Safety Partners	Publicly-owned utilities/electrical coop		M1a	M3	M5		M8			M11	M13	M14	M17a	
	Community Partners	Federal Congressional District		M1	M4	M5		M8			M11	M13	M14	M17	
	Community Partners	State Legislative District Offices		M1	M4	M5		M8			M11	M13	M14	M17	
	Community Partners	Chambers of Commerce		M1	M4	M5		M8			M11	M13	M14	M17	
	Community Partners	CERT Groups		M1	M4	M5		M8			M11	M13	M14	M17	
Customer Service Section Chief	Affected Customers by Account	Residential / Business Account		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Emergency Operations Centers		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Fire stations		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Police/Law Stations		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Schools		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Jails and Prisons		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Public Health Department		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Skilled Nursing Facilities		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Blood Banks		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Healthcare Facilities		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Dialysis Centers		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Hospice Facilities		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Public & Private Utility Facilities		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Energy Sector		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Water / Wastewater		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Communications		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Critical Customers	Chemical Manufacturing Facilities		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
	Affected Population by Zip	Populations / Non-Customers		M1	M2		M6	M7	M9	M10	M11	M12	M14	M15	
													M16	M17	
AFN Liaison	AFN Populations	AFN Service Providers		M1	M2		M6	M8	M9	M10	M11	M13	M14	M15	

Red = Required First, Dark Orange = Required Second, Orange = required, White = optional

** The "M" codes listed above correspond to the script designators, please see SDGE's Notification Script for details.

Appendix D

**Required Pre-Season Tables
(Excel Workbook Filed Via CD-ROM and Available to
Download at <https://www.sdge.com/PSPS>)**

Appendix E

**SDG&E 2021 PSPS Education and
Outreach Survey Templates
(Zipped Folder Filed Via CD-ROM and Available to
Download at <https://www.sdge.com/PSPS>)**

Appendix F

**SDGE May 24-26 FSE Documents
(Zipped Folder Filed Via CD-ROM and Available to
Download at <https://www.sdge.com/PSPS>)**