

**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.

Rulemaking 18-12-005
(Filed December 13, 2018)

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
QUARTERLY UPDATE TO 2021 PLAN TO SUPPORT ACCESS AND FUNCTIONAL NEEDS
POPULATIONS DURING PUBLIC SAFETY POWER SHUTOFFS**

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April 30, 2021

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Pursuant to Conclusion of Law 36 and Ordering Paragraph 1 of the California Public Utilities Commission's (Commission) Phase 2 De-Energization Decision (D.) 20-05-051, San Diego Gas & Electric Company (SDG&E) submits this quarterly update regarding its progress toward meeting its 2021 Access and Functional Needs (AFN) Plan and the impact of its efforts to address the AFN and vulnerable population during Public Safety Power Shutoff (PSPS) events. SDG&E's quarterly update is attached hereto as Attachment A.

Respectfully submitted,

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April 30, 2021

Attachment A

San Diego Gas & Electric Company's
Quarterly Update to 2021 Plan to Support
Access and Functional Needs Populations During
Public Safety Power Shutoffs

April 30, 2021



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I. Introduction

On February 1, 2021, San Diego Gas & Electric Company (SDG&E or Company) submitted its 2021 plan regarding its planned efforts to address people and communities with access and functional needs (AFN) during de-energization events (2021 AFN Plan) in accordance with California Public Utilities Commission (Commission or CPUC) Decision (D.) 20-05-051. SDG&E's 2021 AFN Plan outlined its approach for serving AFN and vulnerable customers leading up to and during de-energization events.

Per D.20-05-051, SDG&E provides this quarterly update regarding its progress toward meeting its 2021 AFN Plan and the impact of its efforts to address the AFN and vulnerable population during de-energization events, also known as Public Safety Power Shutoff (PSPS) events. This update maps to and follows the sequencing of SDG&E's 2021 AFN Plan¹ for ease of reference and builds upon the efforts described therein. Specifically, rather than repeat the activities SDG&E describes in its 2021 AFN Plan that were already taken, this update provides the incremental efforts taken since February 1, 2021.

II. Identification of Customers with Access and Functional Needs

SDG&E has identified approximately 390,000 accounts that may have customers with access or functional needs in its service area, of which approximately 40,000² reside in the High Fire Threat District (HFTD). SDG&E has been collaborating with key statewide AFN stakeholders as a working team to develop a more comprehensive approach to identify customers with AFN beyond the categories currently included in its database:

- Customers enrolled in the California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), Medical Baseline (MBL), and Temperature Sensitive programs;
- Customers who receive their utility bill in alternate format (e.g., Braille; large font);
- Customers who have identified a language other than English as their preferred language;
- Customers who self-identify to receive an in-person visit prior to disconnection for nonpayment or self-identify as having a person with a disability in the household (e.g., disabled hearing impaired; disabled vision impaired; disability – not defined).

The statewide AFN working team is looking to identify customers dependent on uninterrupted power for their health, safety, and ability to live independently. The working team is having discussions to explore the feasibility of leveraging the In-Home Supportive Services (IHSS) Program and IHSS Regional Offices' program data to support these efforts.

¹ SDG&E's 2021 AFN Plan (Feb. 1, 2021) is available here: https://www.sdge.com/sites/default/files/R.18-12-005%20SDGE%202021%20AFN%20Plan%202%201%2021_0_1.pdf

² SDG&E's 2021 AFN Plan submitted on February 1, 2021 incorrectly noted 185,000 AFN customers in the HFTD. Upon further review, SDG&E found counts were duplicated for customer accounts that fell into multiple AFN categories (e.g., an account on both the CARE and FERA programs were counted twice).

Additionally, SDG&E reached out via direct mail to Life Support customers who did not have email or phone numbers listed to ensure SDG&E has the best contact information on file in order to notify them of PSPS events and available support. SDG&E plans to continue to conduct similar efforts with other AFN populations, as well as enhancing awareness of the option to “self-identify” as relying on uninterrupted power for health, safety, and the ability to live independently.

III. External Feedback and Consultation

A. Customer and Community Based Organization Feedback and Research

The customer research conducted in 2020 has informed and driven much of SDG&E’s efforts in removing barriers and projecting respect for customers with AFN when interacting with the Company. As SDG&E has worked to mitigate many of these barriers, the Company is finding more opportunities to better collaborate with a larger group of Community Based Organizations (CBO). Initial meetings between SDG&E’s AFN and research departments have begun and are now in the process of defining and designing planned research efforts in 2021.

1. Customer Research and Feedback

SDG&E used insights from the robust qualitative research study conducted in December 2020 to design improvements to address the needs of SDG&E’s AFN customers, particularly for its communications efforts. A key theme, which was reinforced by the research results, is the need to involve customers with disabilities in designing solutions and including these customers in research and user testing. Based on these results, the following key updates have been made:

- American Sign Language (ASL) interpreter for large meetings:
 - Two ASL interpreting services have been identified and engaged;
 - This valuable resource is available for all external and community communication events such as news conferences, outreach events, and partner meetings;
 - Currently, utilization of ASL is conducted virtually, however ASL interpreting will be available for in-person events as COVID 19 exposure precautions and restrictions are lifted or eased.
- Subtitles for every video:
 - SDG&E is exploring contracting with a vendor to enhance important video messages posted on its customer-facing website to include subtitles and an integrated ASL interpreter in the videos.
- Captions and alternative text (Alt Text) on photos and images:
 - SDG&E is exploring the creation of a working group with representation across multiple internal departments to build an employee education campaign and to develop communication policies on the use of font size, color contrast, and Alt

Text³ within company logos, PDF documents, and other customer-facing materials.

- Hashtags with capitalization:
 - This practice has been adopted by SDG&E's Marketing and Communications team (e.g., #PoweringSanDiego).
- Multiple versions of communications available (e.g., audio, large print, braille):
 - A third-party vendor has been identified and SDG&E is exploring converting all existing PSPS customer notifications to include a URL of that message in a video format with the text of the message, an audio recording of the message and a video of an ASL interpreter signing the message. These enhanced messages will be sent via email and text.
- Enhanced training for customer service representatives:
 - The annual Americans with Disabilities Act (ADA) training for SDG&E Branch Office Customer Advisors has been enhanced to include additional regulations and disability sensitivity to ensure all customers feel welcome and respected.

2. Community Based Organization Capabilities and Language Online Qualitative Survey

In August 2020, SDG&E sent a survey to approximately 1,400 CBOs to better understand how they work with their constituents during a PSPS event and in which languages they communicate. Key insights from the survey included:

- The primary languages spoken by CBO constituents are English and Spanish.
- The primary services provided by CBOs include emotional needs, food security, case management/social services, and essential items, such as clothing and blankets.
- In the future, SDG&E should consider providing the following enhanced services:
 - Connection of constituents with other resources (e.g., 2-1-1 San Diego).
 - Additional safety communications (e.g., signup for alerts, PSPS apps, informational collateral).
 - Connection of constituents with SDG&E programs and services.

In the first quarter of 2021, SDG&E considered the above survey insights and increased its overall PSPS communication efforts and awareness of available support services to further engage CBOs within its Energy Solutions Partner Network. Since these CBOs serve as trusted liaisons within the communities they serve, starting in 2021, SDG&E will provide CBOs with additional notifications they can amplify with their constituents before, during, and after PSPS events, which will also include social media toolkits and talking points.

³ Alt text helps screen-reading tools describe images to visually impaired readers.

3. Communities of Concern | CBO Interviews

Through interviews with CBO representatives conducted in 2020 to better understand the unmet needs of vulnerable populations and how SDG&E can provide more value to these customers, SDG&E identified the following focus areas:

- Expanded Eligibility – Existing programs were cited as needing expanded eligibility. Recertification requirements were provided as a reason for customers not re-enrolling in the program;
- COVID-19 Related Relief – Financial stress has been exacerbated by COVID-19 and people have little flexibility to reduce costs;
- Technology – Increased isolation was reported, and technology is not effective for reaching some vulnerable populations with access constraints; and
- Climate Change – The expectation is that climate change will result in more de-energization events and more resources will be needed to help vulnerable communities withstand the increasing impacts.

Using the insights information gathered from this interview effort, SDG&E continues to look for opportunities in the priority areas identified by partner CBOs to better serve these communities. In February 2021, SDG&E launched its Arrearage Management Plan (AMP) program, which offers debt forgiveness for eligible customers to reduce past due account balances. Additionally, COVID-19 customer protections put into place in 2020 have been extended to June 2021 to provide customers with more time to find and enroll in assistance programs and reduce their negative account balances. SDG&E is partnering with CBOs to promote these options to hard-to-reach communities.

4. Tribal Communities

There are 18 federally recognized tribes within San Diego County.⁴ Each of these tribes is a sovereign nation with its own citizens, some of whom have access and functional needs. SDG&E invites regional tribal leaders and government staff to learn about PSPS events in advance of wildfire season and educates them on programs, improvements and offerings that could help residents with access and functional needs year-round. SDG&E also works with organizations that support tribes, such as the American Indian Chamber of Commerce, Indian Health Councils, and Southern California Tribal Chairmen’s Association, affiliated organizations, and Inter-Tribal Long-Term Recovery Foundation, to provide information and resources that can be used to reach AFN populations.

For several years, SDG&E has had discussions with tribes about challenges they face during PSPS events and has worked to make improvements with increased and more tailored

⁴ There are 16 tribal reservations served by SDG&E, but there are many tribal members that live off of reservations that also receive service from SDG&E. There are also non-federally recognized tribes that receive service from SDG&E.

communications, additional generator support, resource support, and wildfire mitigation enhancements.

In 2021, SDG&E continues to meet with key stakeholders in tribal communities to identify areas of support that should be focused on in advance of wildfire season. Some examples of concern include support for elders, connecting tribes with customer resiliency programs, food scarcity, and limited internet connectivity. SDG&E incorporated previous feedback from tribal communities during the 2020 wildfire season and was able to utilize an existing partnership with Feeding San Diego to support the tribes with an emergency food distribution pantry. In addition, SDG&E provides community flyers with relevant information on each PSPS event to tribal governments and Indian Health Councils for posting within communities. SDG&E plans to continue and expand this support in 2021.

B. Consultation with Interested Parties and Advisory Councils

SDG&E has a demonstrated history of seeking collaboration with community partners on a wide range of programs and services that help the communities it serves. SDG&E's philanthropic funding supports "programs that help diverse underserved populations, people with disabilities, and low-income families." Additionally, SDG&E frequently coordinates with CBOs and leverages their expertise, advice, and counsel on customer obstacles to access essential information and services provided to customers.

By supporting and seeking expertise from community agencies and constituent groups, SDG&E has been able to design targeted programs and more efficient protocols to support equity of service and support to SDG&E's customers. Collaboration encourages introspection of programs and communications and aim to increase the success of all organizations. The following section describes SDG&E's various collaborative partnerships.

1. Statewide AFN Advisory Council

California Investor-Owned Utilities (IOU) share a similar mission to safely and reliably deliver clean energy to the customers and communities they serve. In 2020, the IOUs worked jointly to establish a Statewide AFN Advisory Council (AFN Advisory Council) comprised of a diverse group of recognized community leaders supporting the AFN population, advocates and members of the AFN community, and leaders from various state agencies.

During AFN Advisory Council meetings, the IOUs are advised of potential issues for the AFN community during PSPS events and provided with suggested actions to mitigate some of the impacts to these customers. SDG&E listens carefully to these AFN and disability experts and has made enhancements to its efforts to support AFN customers. Some actions prompted through collaboration of the AFN Advisory Council and are now in place include:

- Privacy screens at Community Resource Centers (CRC) to allow individuals to perform actions of self-care with dignity and privacy;
- Solar-powered mobile phone chargers at pre-season community wildfire safety fairs;

- Temporary hotel stays to support the health and safety of the most vulnerable customers;
- Emergency generator program to deliver no-cost back-up battery units during events to customers whose needs cannot be met by hotel stays, accessible transportation, and food delivery.

The AFN Advisory Council has been a key resource for knowledge and information, helping SDG&E to build an AFN support program and supporting the Company's commitment to continuous improvement.

2. CPUC Disadvantaged Communities Advisory Group

In response to Senate Bill (SB) 350, the Disadvantaged Communities Advisory Group (DACAG) was established by the Commission and the California Energy Commission (CEC) in December 2017. The 11-member group meets several times each year to review and provide advice regarding proposed clean energy and pollution reduction programs and policies to ensure that disadvantaged communities will benefit from these programs. In addition, the DACAG discusses and advises the Commission and the CEC on broader topics related to disadvantaged communities (DAC).

SDG&E had the opportunity to present a summary of the 2020 PSPS season, as well as customer mitigations, at the DACAG's April 16, 2021 meeting. SDG&E shared information on its efforts and received feedback, which largely aligned with SDG&E's existing plans and efforts. SDG&E will consider the feedback received during the DACAG meeting as the Company continues to expand efforts to support the needs of disadvantaged communities.

3. Local Government Advisory Councils and Working Groups

SDG&E participates in numerous local government advisory councils and working groups which include efforts related to populations with access and functional needs. Specific information and updates on these advisory councils and working groups are given below.

a. SDG&E Wildfire Safety Community Advisory Council

SDG&E will continue to conduct quarterly Wildfire Safety Community Advisory Council (WSCAC) meetings in 2021. WSCAC meetings are led by SDG&E's Chief Operating Officer and are attended by members of SDG&E's Safety Committee of the Board of Directors. Consistent with D.20-05-051, WSCAC members include leaders/representatives from the following groups in the San Diego region: public safety partners, communications companies, water service providers, local and tribal government officials, business community, K-12 schools, non-profit organizations, AFN and vulnerable communities, and higher education academic organizations. These meetings are highly regarded as an effective means to present SDG&E's annual Wildfire Mitigation Plan (WMP) and subsequent updates for discussion, suggestions, and recommendations by WSCAC members. SDG&E also welcomes input from WSCAC members on relevant emerging community issues on wildfire safety and preparedness.

The WSCAC's first quarterly meeting for 2021 was held on Friday, February 26. The meeting provided presentations on the December 2020–January 2021 PSPS events in SDG&E's service area, changing wind and climate patterns, SDG&E's culture of safety and wildfire safety, and the Company's wildfire mitigation goals for 2021. The second quarterly meeting of the WSCAC is scheduled for May 21, 2021.

b. AFN PSPS Working Group

As a subcommittee of the County of San Diego's Office of Emergency Services (County OES) existing AFN Working Group, SDG&E's Regional Public Safety Power Shutoff AFN Working Group was formed for the purposes of focusing on households that included a member with a disability or AFN during PSPS events. Representatives from small multi-jurisdictional electric utilities; community choice aggregators; publicly-owned electric utilities; communications companies; water service providers; the CPUC; tribal governments; local governments; public safety partners; and disabled, aging, and AFN service agencies meet on a quarterly basis. These meetings focus on identifying actionable solutions based on the insight and input shared during the collaborative process.

The first meeting of 2021 was held on March 24, and was a successful collaboration to brainstorm the best channels to reach customers with AFN. The second meeting of SDG&E's Regional PPS AFN Working Group for 2021 is scheduled for June 16. SDG&E is currently utilizing the feedback from the Q1 meeting to determine what can and should be integrated into its AFN program to incorporate new channels of communication to reach a wider AFN community with resiliency and support efforts during PPS events. One suggestion from this group was to coordinate emergency messaging between the various agencies responsible for notifications and response during emergency events. SDG&E has taken this advice and does inform and coordinate PPS customer messaging with the San Diego County Office of Emergency Services (County OES), local 2-1-1 organizations, the San Diego Sheriff Department, and local fire agencies prior to PPS messages being shared with the public.

c. Local Support Groups for AFN Customers

In 2021, SDG&E will solicit and utilize feedback from local support groups to help inform what additional support services are needed for AFN customers. There is an array of individual and family support groups for physical, medical, and psychological conditions. These types of groups help individuals and their families better understand what individuals are experiencing and provide for the connection to others in like situations for help and facilitate emotional and technical support.

SDG&E has begun approaching external support group partners to gain agreement on the collaborative outreach campaign to disseminate and communicate important disaster preparedness education, including information on PPS events, and SDG&E services and programs available to support their constituents. Additionally, SDG&E will seek to better understand and consider which accommodations and best practices will result in dignified access to all its customers.

d. Low Income Oversight Board

In 2001, the Legislature established the Low Income Oversight Board (LIOB) to serve as a liaison for low-income ratepayers and to advise the Commission regarding low-income electric and gas customer issues.⁵ The 11-member board consists of a governor appointed chair, CPUC Commissioner, Department of Community Services and Development (CSD) representative, private weatherization contractor representative, electric/gas utility representative, water utility representative, and five members with an expertise in the low-income community not affiliated with any state agency or utility group.⁶ SDG&E and the other IOUs provide standing reports regarding its low-income programs and presents on other topics, such as PSPS, when requested by the LIOB.

The LIOB held the first quarterly meeting on March 11, 2021. In preparation for the meeting, SDG&E provided the LIOB with information regarding the 2-1-1 referral service and AFN support model, inter-tribal agency assistance, and updates on SDG&E's Resiliency Grant Program (formerly known as the Generator Grant Program) and Resiliency Assistance Program (formerly known as the Generator Assistance Program). However, SDG&E did not receive any feedback during this meeting, as the primary focus was energy and water utility Customer Transition Plans for the expiration of COVID-19 Emergency Customer Protections. SDG&E will continue to present at the LIOB meetings and engage in stakeholder presentations to better understand and plan for the needs of the low-income community.

IV. Customer Programs and Available Resources

A. Resources for Vulnerable Populations

SDG&E continues to prepare and support the most vulnerable customers in its service area by providing a broad range of programs, services, and resources. SDG&E will continue to focus on creating new opportunities as areas of improvement are identified in 2021. SDG&E's continuing efforts in this area are described in the following section.

1. 2-1-1 San Diego and 2-1-1 Orange County

In 2020, 2-1-1 San Diego and 2-1-1 Orange County (2-1-1) assisted approximately 300 SDG&E customers during PSPS events. This successful support model will continue into 2021 and enhancements will be made as they are identified through various feedback and review mechanisms. The enhanced services available through this partnership for AFN customers include:

- Enhanced identification of AFN customers through partner lists and phone screening;
- Assessment of AFN population needs and aligning them with existing and new regional services;

⁵ SB 2 from the Second Extraordinary Session (SBX2 2).

⁶ PU Code Section 382.1(b).

- Referral of customers to resources for assistance with services such as evacuation planning;
- Additional services including hotel stays, assisted transportation, food security, welfare checks and delivery of resiliency items;
- Navigation support (e.g., personalized case management and follow-up for impacted individuals with the greatest need);
- Outreach campaign to customers in advance of and during PSPS events through a broad range of communications channels; and
- Proactive community engagement outside of the fire season to ensure AFN individuals have the resources they need ahead of time.

SDG&E continues to identify organizations with quick response capacity that can meet the needs of customers across the region during a PSPS event. Currently, SDG&E is evaluating expanded food security options and resiliency solutions for those impacted in the HFTD during a PSPS event. Additionally, SDG&E will launch a marketing and outreach campaign in 2021 to increase awareness of available support solutions to customers with AFN.

2. Jewish Family Services

Jewish Family Services San Diego (JFS) is one of San Diego's most impactful non-profit human service agencies providing support services for more than 100 years. Through its efforts, JFS helps build a stronger, healthier, more resilient San Diego. SDG&E will continue to partner with JFS in 2021 and is currently looking at additional opportunities for JFS to provide enhancements to existing services in support of those impacted by PSPS events. When a PSPS event occurs, JFS is available to provide services to impacted AFN customers daily from 7 a.m. through 10 p.m. Offering these services with expanded hours ensures customers have access to services when they are most needed. Customers are referred to JFS on an as-needed basis through the 2-1-1 referral network. Services available through JFS include:

- Welfare checks
- Shelf-stable food and ice
- Delivery of resiliency items or kits
- Transportation to a safe location
- Temporary lodging

3. Facilitating Access to Coordinated Transportation San Diego

Facilitating Access to Coordinated Transportation (FACT) provides accessible transportation to those in need. SDG&E will continue to partner with FACT in 2021 and is currently evaluating ways to broaden awareness of accessible transportation services to AFN customers impacted during a PSPS event, as well as streamlining the referral process. SDG&E's partnership with FACT includes enhanced ambulatory (regular) and wheelchair (accessible) transportation for

people with AFN before and during PSPS events. This partnership provides extended hours of operation during PSPS events from 5:30 a.m. to 11 p.m. daily. Customer service calls are coordinated through the 2-1-1 referral network.

B. Customer Resiliency Programs

1. Resiliency Grant Program

SDG&E's Resiliency Grant Program offers a Yeti 3000 rechargeable battery back-up unit, which is delivered to customers' homes. In 2021, SDG&E is expanding this program to accommodate the increased number of MBL customers impacted by 2020 PSPS events, and will also include customers who have self-identified as having a disability, reside in the HFTD, and previously experienced a PSPS event. SDG&E plans to invite approximately 3,700 customer accounts to participate, beginning in the second quarter of 2021. In 2020, 1,420 portable battery units were delivered to customers, with a customer response rate of approximately 78%.

Additionally, in 2021, SDG&E is expanding the pilot program launched in 2020 that enables "real-time" dispatch of a battery generator during a PSPS event to customers experiencing a medical emergency that cannot be transported

2. Resiliency Assistance Program

SDG&E's Resiliency Assistance Program offers a rebate incentive for customers to prepare with backup power sources. The Resiliency Assistance Program offers a \$300 rebate to customers who met the basic eligibility criteria of residing in the HFTD and having experienced a recent PSPS-related outage. In addition, the program targeted the low-income segment with an enhanced rebate of \$450 for all CARE customers. This enhanced rebate is equivalent to a 70–90% discount on the average portable generator models for lower-income customers. The 2021 program will continue to target customers in the HFTD who have experienced previous PSPS events, including enhanced rebates for low-income AFN customers on portable generators, well pump backup generators, and portable power stations.

3. Resiliency Item Program

In 2020, SDG&E explored a Resiliency Item Delivery pilot program during PSPS events. The goal of the Resiliency Item Delivery program was to deliver items such as water, ice, snacks, blanket, battery power banks (for cell phones), and hand cranked radio/flashlight combination tools to AFN customers impacted by PSPS to alleviate hardships. On days when customers experienced a PSPS event, customers received a call from SDG&E's vendor offering the delivery of resiliency items. Interested customers received requested resiliency items the same day.

After further evaluation, SDG&E found customers were not particularly interested or well-served by this service. Many customers expressed that they appreciated the effort, but declined to receive items, as they were already prepared. Additionally, in many cases power was restored prior to the delivery of the items. As a result, SDG&E has decided not to continue with

this program. However, if customers need resiliency items during a PSPS event, customers can obtain these them by contacting 2-1-1, as JFS is prepared to provide as part of its partnership with SDG&E and 2-1-1.

In 2021 SDG&E will continue to collaborate with communities to identify and pilot new support solutions for this population based on customer needs, as well as to scale solutions based on the scope and duration of events. Customer and community feedback will play a key role in informing additional support that may be needed by this population.

C. Community Resource Centers

SDG&E has 10 customer-owned facilities in the HFTD that are available to serve as CRCs during PSPS events. SDG&E has the ability to establish additional CRC locations, should the need arise during an event. Additionally, SDG&E has two mobile CRC units that can be dispatched anywhere in its service territory to support customers' needs. For 2021, SDG&E has identified a preliminary location and is developing plans for a new CRC in the south Orange County region. When SDG&E anticipates that power will be off for an extended period, CRCs will be activated and open from 8 a.m. through 10 p.m. daily until power to the affected community has been restored.

In addition to working with CRC facility owners to ensure ADA compliance, SDG&E is in the process of partnering with an AFN expert to conduct assessments of all CRCs to identify enhancements that may benefit the AFN community. SDG&E also utilizes Advisory Councils and Working Groups to identify enhancements to make customers with AFN more comfortable, and a recent example includes the addition of privacy screens. In 2021, SDG&E will continue to incorporate recommendations from AFN experts and partners.

D. Utility Programs Serving Low-Income and Disadvantaged Communities

SDG&E promotes relevant programs and services through public education and outreach campaigns that are available to AFN customers in advance of PSPS events to support emergency preparedness, cost savings, and resiliency. These programs, described below, not only help low-income and disadvantaged communities, but are also a critical way for SDG&E to reach this demographic of the AFN population.

1. Medical Baseline

The MBL Program provides an additional allotment of energy each month at the lowest price to residential customers with special energy needs due to qualifying medical conditions. In response to the COVID-19 pandemic, and the limitations on medical provider availability, SDG&E has suspended the program requirement for medical provider certification and for recertifications effective March 4, 2020 through June 30, 2021, or as further extended by

SDG&E or the Commission.⁷ To further support MBL customers during the COVID-19 pandemic, SDG&E established an online MBL application located on SDGE.com and implemented enrollment by phone through the Company's Customer Contact Center, which allows customers to self-certify during the COVID-19 pandemic.

Pursuant to D.20-06-003, SDG&E intends to implement a marketing and outreach plan focused on increasing MBL program enrollment in 2021, pending Commission approval. Details of SDG&E's marketing and outreach plans for program years 2021–2023 can be found in SDG&E Advice Letter 3589-E/2890-G, dated August 17, 2020. Further details of this plan are included in Section V.B (Medical Baseline Marketing and Outreach Campaign) below.

2. Income Qualified Programs

The CARE and FERA programs are bill discount programs to help income-eligible customers pay their energy bills. As of March 2021, more than 350,000 SDG&E customers receive energy bill discounts through these two programs. CARE and FERA program participants self-certify they have met certain income guideline criteria. CARE eligibility criteria allow for enrollment of customers who already participate in other income-qualified assistance programs.

The Energy Saving Assistance (ESA) program provides no-cost weatherization services to low-income households who meet the same income guidelines as the CARE program. The ESA program offers low-income natural gas and electric customers weatherization services, energy efficient lighting, energy efficient appliances, energy education, and other services.

SDG&E's ongoing customer assistance campaigns promote CARE and ESA to all income-qualified customers, including AFN populations. SDG&E's efforts to enroll customers in both programs heavily utilize the Energy Solutions Partner Network, which trains CBOs on all relevant SDG&E programs and services. SDG&E expects a CPUC decision on its Low Income Program Application for program years 2021–2026 in the first half of 2021, and will continue all relevant community outreach and enrollment efforts as allowed by the decision.

In addition to promoting and informing CBOs and customers of the assistance programs that SDG&E administers, SDG&E also cross-promotes and coordinates with the Low Income Home Energy Assistance Program (LIHEAP) through the efforts of three Local Service Providers (LSPs) in San Diego County and Orange County. SDG&E also cross-promotes the California Lifeline program in order to provide as much relevant information on ways that customers can reduce utility bills overall.

3. California LifeLine Program

The California LifeLine Program is a State program that provides discounted home phone and cell phone services to eligible households to help consumers lower the cost of phone bills. In

⁷ See SDG&E Advice Letter 3516-E-D/2854-G-D, approved June 16, 2020, and effective March 19, 2020 for approval of protections through April 16, 2020. See SDG&E Advice Letter 3716-E/2961-G, submitted March 19, 2021 and pending approval for extension of protections through June 30, 2021.

2021, SDG&E will continue to promote the California LifeLine program through coordination with its general customer assistance marketing campaign as needed. Additionally, SDG&E includes information on California LifeLine program in the CARE program customer acceptance notification and in the CARE program webpage located on SDGE.com. SDG&E also promotes the LifeLine Program through presentations to CBOs within its Energy Solutions Partner Network.

4. CBO Community Resiliency Program

SDG&E renewed shareholder grant funding in 2021 for the County OES Neighborhood Evacuation Teams (NET), which consists of local Community Emergency Response Team (CERT) members. CERT members assist their vulnerable neighbors with completing a Disaster Preparedness Plan specifically created for people who may need assistance and their caregivers. In 2021, these efforts will focus on evacuation planning and identification of several points of contact for assistance during an emergency.

SDG&E works closely with the CERT teams and County OES, and as part of the NET program. SDG&E will continue to form strong regional relationships to help ensure vulnerable customers have evacuation plans in place during PSPS events classified as non-emergency.

V. Customer Preparedness Outreach & Community Engagement

A. Direct-to-Customer Outreach

SDG&E is planning an enhanced Safety and AFN Public Education campaign that will launch in the second quarter of 2021, building on customer feedback and lesson learned in 2020. This mass-market public education effort aims to achieve a much broader reach beyond the HFTD across SDG&E's service area. The campaign, in combination with direct communications and outreach, will position SDG&E to reach its AFN audience most effectively and promote message consistency across the service territory. Planned tactics for this effort include, but are not limited to, community outreach events, such as wildfire safety fairs and webinars; direct outreach to vulnerable populations in high-fire risk areas; emails to customers; bill inserts; wildfire safety newsletters and brochures; and wildfire/PSPS related outage notifications.

Personal Disaster Plan Brochure

SDG&E collaborated with County OES to produce digital and printed copies of the County's AFN Personal Disaster Plan Brochure, which will serve as a public resource in 2021. The brochure is an all-hazards preparedness document that includes utility-related wildfire safety, PSPS preparedness information, and service offerings.

Brochures will be made available to customers and the public through various SDG&E outreach events in 2021. The document will also be available to CBOs affiliated with SDG&E's Energy Solutions Partner Network, San Diego County's Relay Network, Indian Health Councils, and the general public. The content has been translated into the prevalent languages in SDG&E's

service territory (identified through other regulatory proceedings) and will be available to customers and the general public as printed collateral and digitally posted on SDG&E's website.

Formal CBO Collaborations

In addition to its coordinated efforts with County OES, SDG&E will continue to leverage formal partnerships through its Energy Solutions Partner Network, including those with 2-1-1 San Diego, 2-1-1 Orange County, JFS, and others to inform the public about support services available during wildfire-related events, which include PSPS. Though these services are available to the general public in the SDG&E service territory, this expanded collaboration is specifically designed to help support AFN populations and vulnerable communities. Both 2-1-1 San Diego and 2-1-1 Orange County are umbrella organizations for a consortium of CBOs that specialize in delivery of services throughout SDG&E's service area.

2-1-1 organizations, along with San Diego County's Partner Relay Network, will continue to amplify messaging during wildfire-related events in 2021. SDG&E will continue to provide and update social media kits for organizations to use during events. Additionally, SDG&E will continue to refine communication channels and in-language offerings for these organizations based on feedback from CBOs and customers through direct communications and research (e.g., focus groups and polling).

B. Medical Baseline Marketing and Outreach Campaign

In order to achieve a broad reach across a diverse audience including medical professionals and caregivers who may influence medical care decisions, SDG&E intends to use a combination of direct and general marketing tactics for MBL outreach. SDG&E will employ both traditional and non-traditional advertising methods, such as news sponsorships or station-read announcements, as a way to broadly reach AFN customers who qualify for the MBL program.

SDG&E's public awareness strategy includes the use of mass market and broadcast media, such as print and digital, in a way that treats the message in the style of a Public Service Announcement (PSA), versus a traditional ad campaign. In 2021, SDG&E will combine this broader outreach with more targeted efforts where available, such as high-fire risk areas, incorporating wildfire safety and PSPS messages for customers on life support equipment. Potential tactics include:

- Various multi-cultural publications in-language.
- Digital – Banner ads, paid search, and paid social ads possible for more targeted outreach through various digital channels and social media platforms, for example display on medical and healthcare sites.
- Collateral – Develop Medical Baseline printed and electronic collateral that can be distributed through medical offices, CBOs, and virtual events.

C. Participation in Community Events

Due to the COVID-19 pandemic, SDG&E created new Wildfire Resiliency Webinars and Drive-thru Safety Fairs. The Wildfire Safety Fair events enable SDG&E outreach teams to engage directly with customers and the public, and to directly provide collateral, safety, and resilience materials.

These outreach events are held beginning in the spring and continuing through summer in communities that have historically experienced high-fire risk weather conditions. The goal of the Wildfire Safety Fairs is to provide customers and community members an opportunity to interact directly with SDG&E's subject matter experts regarding important safety and operational information and to continue engagement with external partners, providing much needed resource information to potentially impacted communities. External partners include, among others, CAL FIRE, American Red Cross, 2-1-1 San Diego, San Diego County Animal Services.

In 2021, SDG&E will continue these events and collaborate with CBOs to inform customers about safety measures related to wildfires, community assistance programs and PSPS. In addition to wildfire safety fairs and wildfire resiliency webinars, SDG&E's outreach team plans to support upcoming food distribution, tribal and senior events where information regarding wildfire mitigation, emergency preparedness and PSPS notifications will be provided.

Direct communications tactics, along with proactive media coverage through TV and radio, will be enlisted to help promote these events through HFTD targeted emails. Collateral materials with wildfire safety information will be provided to participants, including the new AFN Personal Disaster Plan brochure that was produced from a collaboration between County Office of Emergency Services and SDG&E.

D. CBO Engagement and Community Partnerships

CBOs are a key channel and support network utilized to promote wildfire preparedness and awareness of PSPS events. This network, comprised of over 400 organizations, serves a critical role in connecting SDG&E with their constituencies and includes the County OES AFN Working Group and Partner Relay Network, which translates communications into dozens of languages. In many cases, these groups are considered trusted partners and experts by the customers they serve, and they are able to provide valuable feedback to SDG&E on the needs of their constituents as well as amplify SDG&E's wildfire preparedness and notification messaging to hard-to-reach customers.

Nearly 200 of these organizations are members of SDG&E's Energy Solutions Partner Network. A majority of these organizations are small, grassroots agencies serving customers that reach diverse, multicultural, multilingual, seniors, Limited English Proficiency (LEP) or non-English preferred languages, disadvantaged and access and functional needs communities. SDG&E works with these organizations year-round to help prepare and educate customers, especially those who may be vulnerable, for wildfires through presentations, events, meetings, and

amplification of emergency preparedness information. Additionally, when a possible PSPS event is identified, SDG&E provides notifications to this Partner Network, which serves as a critical channel to amplify messaging and communicate it to customers who may not utilize traditional channels.

In 2021, SDG&E will continue to partner with CBOs and will especially focus on strengthening existing partnerships and building new partnerships with organizations that represent the needs of customers with AFN. SDG&E has added seven new partners in 2021, including: 1) the San Diego Hunger Coalition, whose mission is to end hunger in San Diego County; 2) the Mitchell Thorp Foundation, which provides support to families whose children suffer from life-threatening illnesses, diseases, and disorders; and 3) Young Black & N' Business, which is a social networking community devoted to the overlooked and underserved majority, with a focal point of helping individuals achieve financial freedom.

Additionally, SDG&E has added a dedicated full-time employee within its stakeholder engagement group to provide strategy for AFN outreach to CBOs.

E. Emergency Preparedness Safety Website

SDG&E maintains dedicated and updated webpages focused specifically on wildfire and PSPS preparedness and safety. Additionally, SDG&E hosts a general preparedness safety webpage that includes safety information related to natural gas, electricity, vegetation management, generator use, emergency preparedness, and power outages. This information is found at [SDGE.com/safety](https://www.sdge.com/safety).

SDG&E's overarching Wildfire Safety Public Education campaign directs customers and the public to the dedicated wildfire safety webpage at [SDGE.com/wildfire-safety](https://www.sdge.com/wildfire-safety). Communication tactics and materials directing to the webpage include, but are not limited to, print collateral, broadcast media, newspaper advertising, digital, in-community communications, and diverse emergency preparedness educational resources.

The wildfire safety webpage serves as the Company's one-stop shop for wildfire preparedness, Public Safety Power Shutoffs, safety information and available resources. Power outage safety and resiliency is emphasized throughout this section of the website. Also included are updated safety tip videos and wildfire safety webinar content. Additionally, the section includes information about the extensive partnerships and systems used to ascertain fire-science data. A primary call-to-action on the wildfire-safety section of the website and company's public-education campaign materials will continue to encourage customers and the public to sign up for wildfire/PSPS notifications, coupled with wildfire/PSPS safety and preparedness, and resiliency tips.

A recent 2020 technology advancement, the SDG&E PSPS mobile app called Alerts by SDG&E, will be further enhanced in 2021. This tool enables customers and the public to sign up for PSPS notifications based on address and geo-spatial location. A dedicated public education campaign to promote the app will continue to be leveraged in 2021, and the app will also

continue to be promoted on SDGE.com. A dedicated landing page at SDGE.com/PSPSapp also provides an overview of the app's functionality and the ability for page visitors to download the app directly to their digital device.

The wildfire safety section of SDGE.com has the capability to be translated into the identified prevalent languages within SDG&E's service territory. A dedicated landing page will provide resources to assist AFN communities, particularly for PSPS events (SDGE.com/AFN). The page provides information and links for: PSPS notification registration, emergency plan/kit checklists, generator safety, the MBL program and application, CARE, FERA and ESA.

SDG&E will continue to broaden its partnerships with 2-1-1 San Diego, 2-1-1 Orange County, JFS, and other community partners, including local Tribal Nations, for communications support and public service offerings during wildfire and PSPS events. A dedicated section of the PSPS landing page (SDGE.com/wildfire-safety/PSPS-more-info) includes information about these CBO collaborations and services they provide. A refreshed year-long AFN public education campaign is planned to launch in the second quarter of 2021. Campaign messaging will drive audiences to this new section of the SDG&E website and refer to the CBOs supporting the AFN community.

Additional fire and weather-related webpages are also actively maintained throughout weather-related incidents by SDG&E and are accessible at the following addresses:

- Weather: SDGEweather.com
- Community Resource Centers: SDGE.com/resource-centers
- Outage Map: SDGE.com/outages

SDG&E's wildfire safety section of the website will continue to be leveraged as a central repository of information and resources for the 2021 public education campaign that begins in the second quarter. Along with a focus on PSPS awareness, this year's AFN public education expansion will include resources for deaf and tribal communities, and will significantly increase Spanish communications and public education. Enhanced website content is also planned for these efforts in the second and third quarter of the year.

VI. In-Event PPS Customer Communications

A. Event Notifications

SDG&E initiates outbound dialing campaigns utilizing its Enterprise Notification System (ENS) to notify all impacted customers of PPS events. For MBL customers, SDG&E reviews the results of each campaign to determine if a positive confirmation for MBL customers was received through a voice contact (landline or cell phone, based on the customer's preferred contact number). For any MBL customers SDG&E does not reach by voice contact, a list is provided to SDG&E's Customer Contact Center to proactively call customers who have not been contacted. If the Customer Contact Center is unsuccessful in contacting the customer, SDG&E will send a Customer Service Field representative to the customer's service address to notify them.

B. Website and Mobile App

SDG&E has a dedicated PSPS website for customers. The website has a dashboard layout that makes it easier to find information. Additionally, the webpage has an address look-up tool so customers can find out if they are impacted. The page also includes a dynamic list of communities impacted and potential shutoffs, including real-time customer counts and CRC locations.

The page also has customized information for AFN customers, including resources, and details highlighting the Company's partnership with 2-1-1. Specifically, for AFN customers, the page was built with a responsive design and coding that optimizes the webpage on all devices and was built with low-bandwidth and customers with AFN in mind. The page adheres to Web Content Accessibility Guidelines, or WCAG 2.0, and Section 508 of the Rehabilitation Act (29 U.S.C. § 794d), and SDG&E is working towards WCAG 2.1 guidelines. This includes natural information, such as text and images, as well as code or markup that defines structure and presentation.

SDG&E also has a dedicated PSPS mobile app available for iPhone and Android. The app is "unauthenticated," which means users do not need to log in to use the app. This is helpful for customers with AFN, as well as other customers who might not have an account with SDG&E (e.g., renters whose landlord covers utilities).

Users receive up-to-date, real-time status updates with push notifications for saved locations, and use an interactive map. Users also have clear insight into restoration efforts with status tracker and time of restoration estimate.

The app was built with the W3C WAI Mobile Accessibility guidelines. Specific items that were factored in include zoom and magnification, contrast, small screen size, keyboard control for touchscreen devices, touch target size and spacing, and touchscreen gestures.

C. Media

Diversity of media mediums will continue to be utilized to help reach AFN communities and promote wildfire safety and PSPS awareness. The public education campaign that began last fall, will be in market in 2021 (Q2-Q4) and will include a variety of media channels and messages. Digital and paid social media channels such as Twitter, Facebook, Instagram and Nextdoor will be used to target large audiences as well as niche markets including, but not limited to, older adults, lower income households, in-language communities, and people with disabilities. In-studio (morning and weekend news programs) outreach and virtual interviews with local broadcast media will also be used to help supply important preparedness information and promote community events like SDG&E's drive-thru Wildfire Safety Fairs and webinars. The Company is also exploring additional video assets about household safety and preparedness that can be used on its YouTube channel, webpage, and other digital platforms.

SDG&E will continue to use broadcast media (radio and TV) and PSAs as a form of mass market communications. Content will include, but will not be limited to, mitigation measures being implemented to reduce wildfire risk and impacts associated with PSPS; community resources like 2-1-1 San Diego and Orange County; and emergency preparedness. The Company's wildfire documentary, *Everything in Our Power*, is also being updated to reflect the new efforts and investments SDG&E has made in wildfire safety. The updated documentary will be made to the public through multiple broadcast and digital media platforms.

Prior to a wildfire-related event, the media will be engaged early and often to ensure all our customers, and the public, are notified of impending conditions. Local broadcast media, including designated emergency broadcast radio, will continue to amplify SDG&E's messaging during a wildfire or wildfire-related event to keep customers and the public informed. Local broadcast media is kept apprised of situational awareness prior to the start of an event, informed of conditions during an event and followed up with after an event has concluded. In 2021, SDG&E will continue to make any needed COVID-19 adaptations in its approach with media. Social media will also be heavily used during wildfire season. Information is made available in real time during an event to provide the public with additional channels to receive timely information.

The AFN public-education campaign will be in market beginning in Q2 2021 and will continue through year-end. This is an earlier deployment timeline than in previous years. The focus in Q1 was soliciting feedback from affected customers and stakeholders, coupled with 2020 lessons learned to further strengthen the public awareness and communications campaign. The campaign will continue to include a diversity of media channels and messages. Digital and paid social media channels such as Twitter, Facebook, Instagram, and Nextdoor will be used to target large audiences as well as niche markets including, but not limited to, older adults, lower income households, in-language communities, and people with disabilities. The Company will continue to use broadcast media (radio and TV) and public service announcements (PSAs) as a form of mass market communications with AFN messaging. Content will include, but will not be limited to, mitigation measures to reduce wildfire risk and impacts associated with PSPS; community resources like 2-1-1 San Diego and 2-1-1 Orange County and emergency preparedness. This year's AFN public-education expansion will include culturally-customized messaging and resources for the hearing impaired and tribal communities, along with increased communications in Spanish, as largest prevalent language after English.

D. Call Center Support

In 2021, SDG&E will continue to support customers with AFN, including during PSPS events. When concerned customers call and speak with an agent, they will be directed to the appropriate resource to receive support (e.g., 2-1-1, Customer Assistance AFN Emergency Operations Center (EOC) role, etc.). Additionally, SDG&E's Customer Contact Center representatives are trained to speak with customers experiencing challenges and if it is the customers' preference, flag them in SDG&E's system as having a self-identified disability for additional consideration of tools, programs, and services.

E. Customer Assistance AFN EOC Role

In 2020, SDG&E created and staffed a new position in its EOC specifically dedicated to supporting customers during PSPS events. This seat collaborates extensively with SDG&E's support partners including 2-1-1, FACT, JFS, Salvation Army, and other CBOs to provide up-to-date information on PSPS events and to address the needs of customers reaching out for assistance. SDG&E plans to continue this dedicated EOC seat in 2021 and will continue to refine and enhance support services.