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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July 30, 2021
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine
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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

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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July 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

July 30, 2021
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SDG&E 2021 AFN Support Plan: Quarterly Update

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 April 30, 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).

- 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).

This information has been used to promote wildfire preparedness and PSPS support services including back-up battery programs. Additionally, this information has been utilized to target promotion of key programs including Medical Baseline and the Emergency Rental Assistance Program.

SDG&E has also recently added an “AFN” field to our database, enabling customers to self-identify as having an “AFN” without having to specify a disability or other personal information.

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1 SDG&E’s 2021 AFN Plan (Feb. 1, 2021) is available here: [https://www.sdge.com/sites/default/files/R.18-12-005%20SDG&E%202021%20AFN%20Plan%202021%200_1.pdf](https://www.sdge.com/sites/default/files/R.18-12-005%20SDG&E%202021%20AFN%20Plan%202021%200_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).
This option will be promoted in late July/early August via a mailer to approximately 15,000 customers, and SDG&E will continue to look for further promotional opportunities.

SDG&E continues to collaborate with key statewide AFN stakeholders as a working team to explore opportunities for data sharing to enhance identification efforts. Additionally, as the campaign for wildfire safety season begins, the AFN team leveraged our partners’ constituencies by training key community partners on available public safety power shutoff preparedness support services (e.g. hotel stays, accessible transportation, etc.). The AFN Statewide Investor-Owned Utility (IOU) working group joined forces and conducted online training webinars in Q2 with California’s Department of Social Services’ In-Home Support Services (IHSS), Public Authority, and Waiver Personnel Care Services (WPCS), Hospital Council/Hospital Association and California Rural Indian Health Board (Tribal Governments Consultation Meeting). SDG&E recognizes that other agencies and organizations are the experts in this space and has collaborated with agencies such as the State Council on Developmental Disabilities (SCDD), Developmentally Disabled Provider Network (DDPN) and the Residential Long Term Care Facility (RLT CF) to disseminate key information on PSPS preparedness, customer assistance programs, Medical Baseline, resiliency information and access and functional needs to their constituents.

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 demonstrating respect for customers with AFN when interacting with SDG&E. Additionally, SDG&E is building on that foundation by conducting new surveys in 2021.

1. Customer Research and Feedback

2020 Disability Needs Assessment

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 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 external meetings:
  - Two ASL interpreting services have been engaged and are available for all external and community communication events such as news conferences, outreach events, and partner meetings; and
  - ASL interpreters have also been engaged for virtual and in-person events.
• Subtitles for every video:
  o SDG&E identified and engaged a vendor to enhance important customer safety and program 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:
  o A dedicated cross-functional team across SDG&E has been established to build an employee education campaign and drive 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:
  o This practice has been adopted by SDG&E’s Marketing and Communications and Social Media teams (e.g., #PoweringSanDiego).

• Multiple versions of communications available (e.g., audio, large print, ASL):
  o SDG&E engaged DeafLink and converted all existing PSPS customer notifications to include a URL of that message in a video format with and ASL interpreter, audio voice-over as well as closed captioning. These enhanced messages will be sent via SDG&E’s Emergency Notification System as email and text. The messages will also be available on the SDGE Alerts app.

• SDG&E employee disability inclusion education:
  o A monthly cadence for internal employee communication, education and exposure to the Americans with Disabilities Act (ADA) and the importance of AFN inclusion has been established with the first two communications released in June (PSPS Message Enhancement for the Deaf and Blind and Post Traumatic Stress Disorder Awareness Day).

• Enhanced training for customer service representatives:
  o Utilizing San Diego (SD) County Office of Emergency Services’ “First Responder Access and Functional Needs Series” to train SDG&E Customers Service Field representatives; and
  o Enhanced annual ADA training to include ADA regulations and disability sensitivity to ensure all customers feel welcome and respected.

PSPS Support Survey

In April 2021, 2-1-1 San Diego surveyed customers who received support services during the 2020 wildfire season and shared summary of findings with SDG&E. Overall, customers agreed

³ Alt text helps screen-reading tools describe images to visually impaired readers.
that 2-1-1 met their support services need and were satisfied with the process. Bill assistance, food resources, hotel stays and resiliency items were the most requested items.

2. Online Panel Survey focused on PSPS Support for AFN Customers

In June 2021, participants in SDG&E’s Residential Power Panel were given a short online survey asking how SDG&E can better support them during PSPS events. A total of 935 panelists responded to the survey, which included responses from customers on CARE, Seniors, households with permanent disabilities, customers on Medical Baseline, and customers who rely on electrical medical equipment.

Of those who responded, 10% (or 95 customers) reported that they were shut off as part of a PSPS event within the past six months. Of those, half said they were satisfied with the communications they received from SDG&E. Comments from AFN customers were organized into categories and reviewed to identify pain points that may be unique to each group. In all, across all vulnerable groups, most comments focused on two requests: 1) to be notified as early as possible so they can plan accordingly, and 2) to have access to affordable generators (particularly seniors and those who rely on equipment).

3. Qualitative Research to Develop/Enhance AFN-Focused Landing Page

In May 2021, SDG&E solicited feedback from the Statewide AFN Working Group, Regional PSPS AFN Working Group, San Diego OES AFN Working Group, Indian Health Council, Southern Indian Health Council, and local Community Base Organization (CBO) partners to get their input early in the development of the AFN-focused landing page on SDGE.com. A total of 22 responded to an online survey and provided useful feedback to incorporate into the content and design of the page. Nearly 3 in 4 said that having a dedicated landing page for those with access and functional needs is important, especially for information on emergency preparedness, outages, and PSPS alerts. They also suggested appropriate phrases and terminology to incorporate, as well as advising on which ones to avoid.

In addition to CBO input, customer feedback will also be solicited. In July, customers with a disability and/or a disabled household member will be participating in moderated 1:1 interviews to review the page and provide opinions on overall usefulness, content, layout, and design. The goal is to complete customer interviews over the course of a couple weeks in order to be able to make any necessary changes or enhancements before the end of the summer.

4. Tribal Communities

In preparation for the 2021 wildfire season, SDG&E met with key stakeholders in tribal communities to identify areas of support that should be focused on in advance of wildfire season. The key area of concern focused on resiliency items, access to generators, food scarcity, and limited internet connectivity. As a result, SDG&E provided two key tribal health agencies, the Indian Health Council and Southern Indian Health Council, with resiliency items including
blankets, bottled water, hand crank radios, and power banks. SDG&E set aside dedicated back-up battery units for the tribal communities and worked with the Indian Health Council and Southern Indian Health Council to simplify the enrollment process. The councils were very receptive to the assistance and SDG&E plans to continue and expand this support in 2021. SDG&E is also co-hosting a Wildfire Resiliency Fair in July 2021 with the La Jolla Band of Luiseno Indians to help prepare the surrounding communities in advance of wildfire season.

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

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.

The AFN Advisory Council has been a key resource for knowledge and benchmarking with the other IOUs, helping SDG&E to build an AFN support program and supporting the Company’s commitment to continuous improvement. Progress has been made to align AFN resources across the state, and in June the working group shared a comprehensive PSPS AFN resource matrix with the AFN Advisory Council.

Some actions prompted through collaboration of the AFN Advisory Council and are now in place include:

- Developing a statewide 211 partnership in response to concern that utility employees are not equipped to be social workers;
- Engaging with “trusted” state and regional agencies (i.e. IHSS and Regional Centers) that serve the AFN communities;
- Joint outreach training presentations on PSPS and customer assistance for MBL, PSPS preparedness and resiliency and promotion of the www.prepareforpowerdown.com site
Additionally, in Q2 subcommittees were formed from the Joint IOU PSPS Working Group to meet on key topics of interest to the Council including: Communication/Outreach, Needs Assessment, Success Measures and Assistive Technologies.

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).

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 provided 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. 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.

The WSCAC’s second quarterly meeting for 2021 was held on Friday, May 21. The meeting provided presentations on the 2021 Weather & Drought Outlook, Wildfire Safety Innovation through Academic Partnerships and the Technosylva’s 2019 PSPS Wildfire Risk Analysis Results. The third quarterly meeting of the WSCAC is scheduled for August 18, 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 second quarter meeting revealed the availability to leverage the CERT teams in rural areas to communicate to customers with limited connectivity by utilizing community message boards and door knocks by CERT volunteers. For a detailed summary, please see SDG&E’s PSPS AFN Working Group Report for the second quarter of 2021.4

c. 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 second quarterly meeting on June 17, 2021. In preparation for the meeting, SDG&E provided the LIOB with information regarding customer support and available services during PSPS events, including 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).

SDG&E did not receive any feedback during this meeting related to PSPS. The meeting primarily focused on the California Alternate Rates for Energy (CARE) Program and the Energy Savings Assistance (ESA) Program activities through April 2021. 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

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4 SDG&E’s PSPS AFN Working Group Report for the second quarter of 2021 (July 9, 2021) is available here: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M392/K632/392632800.PDF
5 SB 2 from the Second Extraordinary Session (SBX2 2).
6 PU Code Section 382.1(b).
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;
- 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 has renewed this partnership for 2021 and is continuing ongoing collaboration to identify opportunities for enhancement of available solutions and refinement of processes. As a result of feedback received from 2-1-1 following the 2020 wildfire season, SDG&E has expanded no-cost hotel stays as well as its Emergency Generator Program to dispatch back-up battery units during PSPS events for critical situations. Additionally, in response to customer feedback SDG&E has engaged a partner to provide warm food to significantly impacted communities during PSPS events.

Additionally, SDG&E launched a marketing and outreach campaign in April 2021 to increase awareness of available support solutions to customers with AFN.

2. 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 3000X rechargeable battery back-up unit, which is delivered to customer 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. In the second quarter of 2021, SDG&E started sending invitations to approximately 3,700 customer accounts to participate in this program.

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 and portable power stations. Invitations to participate in this program began going out to customers in the second quarter of 2021.

3. Resiliency Pilots

In July 2021, SDG&E is piloting a new resiliency program which includes a web online survey (located at sdge.com/prepared) and will be officially launched in late July/August 2021 to customers. Additional proactive outreach and personalized phone calls will be made to vulnerable customers flagged and self-identified as AFN in SDG&E’s database to offer the Resiliency Audit Survey.

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 added a Community Resource Center (CRC) in Fallbrook, for a total of 11 customer-owned facilities in the HFTD that are available to serve as CRCs during PSPS events. Additionally, SDG&E has added a third mobile CRC unit that can be dispatched anywhere in its service territory to support customers’ needs. 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 has contracted a Certified Access Specialist (CASP) who has conduct assessments of all CRCs to identify enhancements that may benefit the AFN community. Items to enhance the comfort and safety of AFN customers who visit a CRC have been purchased and combined into a CRC “AFN Go Kits” to deploy with every activation. These AFN Go Kits include items such as addition signage for accessible parking, accessible restroom, Visual Language Translation cards, safety mats and tactical safety floor signage, privacy dividers and message boards.

All employees that will staff CRC’s are now assigned the newly enhanced ADA Compliance and Disability Integration web based training course.

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.

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.

Additional payment assistance programs available to support those customers in need, include the Arrearage Management Payment (AMP) Plan and the state Emergency Rental Assistance Program (ERAP).

The AMP is a 12-month payment plan that forgives 1/12 of an eligible participant’s arrearage after each on-time payment of the current month bill. After 12 on-time payments, the participant's arrearage will be fully forgiven, up to a maximum of $8,000. Additionally, enrolled participants are protected from disconnection for non-payment.

The ERAP provides additional support for renters who have experienced financial hardship as a result of COVID-19 and meet certain income guidelines. This program provides rent and utility bill assistance to customers residing within San Diego County, the City of San Diego, and Chula Vista.

SDG&E’s ongoing customer assistance campaigns promote CARE, ESA, AMP, and ERAP to income-qualified customers, including AFN populations. SDG&E’s efforts to enroll customers in these programs utilizes the Energy Solutions Partner Network, which consists of about 200 CBOs, who help provide customers with all relevant SDG&E programs and services. Throughout Q1 and Q2, SDG&E’s Outreach Team and its Partner Network heavily focused on amplifying messaging around payment assistance programs, particularly AMP and ERAP, through events, presentations, and social media posts. SDG&E has strategically identified and engaged CBOs to promote these programs to the AFN population.

In addition to promoting and informing CBOs and customers of the assistance and bill payment programs available, 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. 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

Public Education Campaign

During the second quarter of 2021, SDG&E initiated the AFN Wildfire Safety paid public education campaign. Additionally, direct and customized communications to AFN customers were initiated with specific offers and complementary wildfire safety and PSPS messaging for AFN communities. This public education was expanded from the high fire threat areas to the entire service territory. The mass market tactics include:

- Streaming radio in English and Spanish
- Print advertising in Hispanic, Asian and African-American publications, as well local/in-community publications supporting rural areas of elevated wildfire threat
- Digital (display banners) in English and Spanish
- Paid Social Media in English and Spanish

The paid campaign will run through the fourth quarter of the year.

Tribal Communications

SDG&E has secured contracts with two tribal consultants. These tribal resources have begun review of messaging and materials with the intent to customize them for tribal audiences. Additional work scope will include the creation a cultural toolkit with tribal history summaries, cultural resource information, and an archive of culturally sensitive imagery. They will also help facilitate tribal community engagement to review new materials and provide feedback. This effort will help to identify gaps and create more appropriate, relevant and culturally appropriate content and materials for tribal communities. This will be a multi-year effort. Additionally, these consultants were engaged in quarter two to provide tribal messaging in SDG&E’s 2021 Wildfire Advancements video that will be released in July.

Direct Mailers

SDG&E is utilizing several direct mail campaigns to prepare customers in the HFTD, and especially those with AFN, for wildfire season. Some of these direct mail campaigns include:

**Direct Mail Campaign to MBL customers:** SDG&E is preparing to send letters to current MBL customers in the HFTD. The letter is intended to educate them further about Public Safety Power Shutoffs as well as encourage updating their contact information and
signing up for notifications. The letter is in the process of being finalized and distributed in early August.

**Mobile Home Park Direct Mail Campaign:** SDG&E is preparing to send PSPS safety information to Mobile Home Park residents. These information packets include information on preparing for a wildfire, PSPS notifications and AFN support available during PSPS information and will be sent to all mobile home parks for distribution to residents. This mailing will also promote the new AFN landing page (sdge.com/AFN) and customer service offerings including assistance programs and MBL. These communications are planned for July and August as well.

**HFTD Newsletter:** SDG&E sends an annual HFTD Newsletter to all residential customers residing within the HFTD. The mailer includes resiliency and preparedness information for threat of wildfire and PSPS. Additionally, MBL information is also included in the newsletter, along with AFN information pertaining to solutions available through SDG&E’s partnership with 2-1-1. Content is currently being finalized and the newsletter will be distributed in August.

**Personal Disaster Plan Brochure**

During the second quarter, the printed San Diego County Office of Emergency Services’ AFN Personal Disaster Plan brochure has been provided to each attendee at the Wildfire Safety Fairs. A digital version of the brochure has also been added to the SDG&E Wildfire Safety webpage and the new AFN landing page (sdge.com/AFN).

**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, 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.

The 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 provides social media kits and talking points for these organizations to use during events. Additionally, SDG&E has been meeting directly with ~50 partners who serve constituents in the HFTD to provide specific PSPS training, webinars and PSPS kits to ensure these CBOs are prepared to support communication and notification efforts before, during and after PSPS events.

**Program Promotion**

In addition to information specifically related to wildfire and PSPS preparedness and support, SDG&E utilizes opportunities to cross-promote programs and solutions to customers with AFN.
AFN specific messaging has been added to PSPS notifications, social media and sdge.com/afn to inform customers of offerings and services available to them. In particular, the efforts summarized above will promote the availability of the MBL program.

B. Medical Baseline Marketing and Outreach Campaign

Additionally, in July SDG&E launched a campaign promoting the MBL program throughout the service territory. Mass-market advertising will be used for this effort, and tactics include, but are not limited to, digital advertising and paid social media. Messaging associated with this campaign is intended to bring new program participation and will encourage new customer sign-ups for MBL. The campaign will run through the end of the year.

Additionally, targeted direct communications will be utilized to promote the program for new enrollments as well as encourage current participants to update contact information and sign up for PSPS notifications. The Statewide AFN PSPS Working Group created a joint flyer promoting MBL that was distributed to statewide social services (e.g. In Home Supportive Services) in June.

C. Participation in Community Events

In May, SDG&E hosted six Wildfire Safety webinars for customers and the public. These events provided an online opportunity for attendees to learn about current and new efforts SDG&E is implementing to keep the region safe. Some of these events were also held in collaboration with CALfire and the 2-1-1 San Diego and Orange County organizations. 2-1-1 efforts and service offerings mainly target AFN communities and were also shared during the webinar events. Promotion of these events included social media publicity, TV and radio broadcast news interviews and coverage, radio advertisement buys, promotional and reminder emails to all HFTD residential customers prior to each event, and event amplification by community partners.

SDG&E is also hosting five (5) Wildfire Safety Fairs this year. Three drive-through Fairs occurred in May and June and attendees remained in their vehicles due to pandemic safety conditions. Two additional in-person fairs are scheduled in August. Promotional communications are being updated to reflect the revised format for the Fairs and will utilize the same tactics listed above for promotion of the webinars. SDG&E utilizes safety fairs to cross-promote relevant programs, including MBL. This year’s events have garnered record attendance, with the August Fairs expected to have the highest number of attendees to date.

In addition to wildfire safety fairs and wildfire resiliency webinars, SDG&E’s outreach team has attended food distributions, tribal and senior events where information regarding wildfire mitigation, emergency preparedness and PSPS notifications will be provided.
D. CBO Engagement and Community Partnerships

CBOs are a key channel and support network utilized to promote wildfire preparedness and awareness of PSPS events. In addition to broader community partnerships, SDG&E has ~200 members of its Energy Solutions Partner Network. SDG&E works closely with this network to connect customers with programs, solutions and tools, including Customer Assistance, PSPS and wildfire preparedness. These organizations represent the diversity within SDG&E’s service territory and a majority are small, grassroots agencies serving customers with access and functional needs, including those that are multicultural, multilingual, low income, senior, and limited-English proficiency (LEP) audiences in communities of concern. 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 Q1 and Q2 of 2021, SDG&E focused on enhancing its engagement efforts with CBOs by strengthening existing partnerships and building new partnerships with organizations that represent the needs of customers with AFN. SDG&E has added about 20 new partners since last wildfire season, including: 1) Sherman Heights Community Center, whose mission is to foster community through education, cultural enrichment, health promotion and personal development 2) Lived Experiences, whose mission is to build an active and engaged community committed by finding sustainable solutions to alleviate hunger, reclaim and repurpose waste and promote the health and well-being of all; and 3) Episcopal Community Services, whose mission is to inspire children, empower adults and transform communities by providing vital, high-quality social services that encourage healthy interdependence. SDG&E will leverage these new and existing partnerships to amplify PSPS messaging and notifications by providing more robust tools and processes for partners to reference, including a PSPS Partner Prep Kit.

Additionally, SDG&E added a new dedicated position within its stakeholder engagement group to provide strategy for AFN outreach to CBOs, including conducting a gap analysis to determine areas of opportunity to enhance partnerships with a focus on reaching AFN customers in the HFTD, mobile home parks, health clinics and multi-family dwelling units in rural communities. The gap analysis identified strong representation across SDG&E’s service territory for CBOs serving customers with disabilities, seniors and low-income.

E. Emergency Preparedness Safety Website

AFN Landing Page

During the second quarter of 2021, SDG&E launched a new dedicated AFN page (sdge.com/AFN), bringing available resources together in one place, including safety and education information about wildfire preparedness and PSPS solutions. Additionally, the page promotes customer programs that can be useful to AFN populations including Financial Bill
Support Assistance, Health & Medial Assistance and Communication Support Assistance. The landing page is also offered in the prevalent languages spoken in SDG&E’s service territory.

The AFN page also offers resources that customers can review and download including the San Diego County Office of Emergency Services AFN Personal Disaster Plan brochure, emergency kit and plan checklists and includes resources for large-print billing. Customers are also encouraged to update their contact information and sign up for PSPS notifications. The general public and customers are encouraged to download the PSPS app with corresponding links on the landing page. This page is also promoted in direct communications to customers including the HFTD Newsletter, bill insert and a special mailing to mobile home parks in the region.

Wildfire and PSPS Webpage

SDG&E maintains dedicated and updated webpages focused specifically on wildfire and PSPS safety, preparedness, response and resiliency.

SDG&E’s overarching Wildfire Safety and PSPS Public Education campaigns direct both customers and the public to dedicated webpages at SDGE.com/wildfire-safety and SDGE.com/psp. Communication tactics and materials directing to the webpages include, but are not limited to, print collateral, tv and radio paid advertising, broadcast news media, newspaper and in-community publication advertising, diverse digital, in-community communications, and varied 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 wildfire and PSPS mitigation advancements videos, safety tip and preparedness videos, wildfire safety webinar content, and collateral materials that are produced for print, such as brochures, facts sheets, newsletters, etc. Additionally, the section includes information about the extensive partnerships and innovative technologies used to for enhanced situational awareness. A primary call-to-action on the wildfire-safety and PSPS section of the website, and company’s public-education campaign continues to encourage customers and the public to sign up for wildfire/PSPS notifications, coupled with wildfire/PSPS safety, preparedness and response, and resiliency tips.

Alert App

SDG&E continues its dedicated PSPS mobile app “Alerts by SDG&E” into the 2021 wildfire season and is focused on further enhancing the customer experience and data quality. SDG&E analyzed the notification and customer data from the 2020 events and has made a number of enhancements to support timely updates throughout the PSPS journey.

This tool enables customers and non-account holders to sign-up for PSPS notifications for up to 5 addresses, which is important for renters, mobile home park customers and caretakers who can monitor the status for a loved one.
SDG&E continued to promote this app in Q2 through our Wildfire Safety and PSPS public education campaigns, as well as continuing to promote on SDGE.com. A dedicated landing page at SDGE.com/PSPSapp provides an overview of the app’s functionality and the ability for page visitors to download the app directly to their digital device.

VI. In-Event PSPS Customer Communications

A. Event Notifications

SDG&E continues to notify all impacted customers of PSPS events as soon as possible. This notification is sent via all available channels that we have contact information for (e.g. home phone, cell phone, text, email etc.). These notifications are translated into all prevalent languages in the area. SDG&E is currently enhancing its notification system to enable even faster notifications to customers, which will be implemented prior to September 1.

Further, to reach those without internet or cellular service, SDG&E utilizes grass-roots channels such as printed flyers at key community sites, mobile road signs, and community marquis at schools and other locations. SDG&E supplements this outreach with partnerships with more than 200 community-based organizations to enhance customer awareness and share information.

Enhanced Accessibility

New in 2021, SDG&E has worked with DeafLink to convert all PSPS customer notifications to include a URL of that message in a video format with and ASL interpreter, audio voice-over and closed captioning enabling accessibility for all customers.

B. Website and Mobile App

SDG&E has a dedicated PSPS website for customers. This site includes an address look-up tool to enable customers to see 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 customers with an access or functional need, 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 AA 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

SDG&E has developed strong partnerships with TV and radio broadcast media outlets, both in English and Spanish. SDG&E leverages these partnerships before and during PSPS to increase community awareness. During a wildfire and/or PSPS, local broadcast media (TV, radio and print) amplify customer notifications and play a key role in communicating updates on situational awareness. Local media meteorologists also use the SDG&E weather cameras to provide additional high fire weather condition updates throughout the duration of the wildfire and/or PSPS.

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 Emergency Operations Center Role

In 2020, SDG&E created and staffed a new position in its Emergency Operations Center (EOC) specifically dedicated to supporting customers during PSPS events. This seat collaborates extensively with SDG&E’s support partners including 2-1-1, FACT, 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.