

San Diego Gas & Electric Company's Progress Report on Implementation of De-Energization Guidelines

September 4, 2019



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I. Introduction

Pursuant to Ordering Paragraph (OP) 3 of California Public Utilities Commission (Commission or CPUC) Decision (D.) 19-05-042, San Diego Gas & Electric Company (SDG&E) submits this report detailing its progress towards implementation of the de-energization guidelines set forth in Appendix A of D.19-05-042 (Guidelines).¹ A copy of this progress report is being provided to the Director of the Commission's Safety and Enforcement Division (SED), served to the service list of Rulemaking (R.) 18-12-005, and posted to SDG&E's website.

SDG&E has an obligation to operate its system safely. This obligation requires SDG&E to de-energize (i.e., turn off) power lines when necessary to protect public safety (Public Safety Power Shutoff or PSPS). SDG&E is statutorily authorized to do so under California Public Utilities Code (P.U. Code) §§ 399.2(a) and 451, consistent with D.12-04-024, Commission Resolution ESRB-8, and D.19-05-042. Any decision to de-energize power lines for public safety is made in consultation with SDG&E's Emergency Operations Center (EOC), Meteorology, and Electric System Operations leadership. Typically, it is expected, but not required, that the Fire Potential Index (FPI) would be "extreme" or there would be a "Red Flag Warning" in effect when a PSPS decision is made.

SDG&E takes great pride in providing reliable energy to its customers and utilizes PSPS as a last resort measure to reduce wildfire risk. SDG&E manages and mitigates the impacts of PSPS events through collaboration with key stakeholders and by implementing voluntary and CPUC-mandated mitigation measures, including extensive notification efforts. SDG&E appreciates this opportunity to highlight its progress towards complying with the new PSPS requirements established by the Commission in D.19-05-042. This report maps to and follows the sequencing of the Guidelines for ease of reference.

II. Overarching Guidelines

This section describes SDG&E's overarching efforts to educate customers on its PSPS programs and coordinate and collaborate with state and local jurisdictions, agencies, and first responders before, during, and after PSPS events.

A. Customer Education & Outreach

SDG&E is actively educating its customers on the purpose, process, and impacts of de-energization events and how to manage safely through them. This effort entails a multi-faceted approach to maximize the reach and impact of customer education efforts. Activities include

¹ D.19-05-042 at OP 3 provides that the electric utilities "must submit two progress reports detailing progress towards implementation of the guidelines set forth in Appendix A." The first progress report is due three months after issuance of D.19-05-042, which is September 4, 2019. The second progress report is due nine months after issuance of D.19-05-042, which is March 4, 2020.

open houses and Wildfire Safety Fairs throughout SDG&E's service territory, development of a PSPS Policies and Procedures document that will be made publicly available, direct communications to customers via various channels, and participation in a statewide public education and outreach campaign. SDG&E is also coordinating with state and local jurisdictions and agencies and developing plans for notification and communication before and during events, which includes aligning messaging with the California Alert and Warnings Guidelines. Additionally, SDG&E regularly communicates with the other investor owned utilities (IOUs) to share information and lessons learned to develop best practices across California.

Over the past few months, SDG&E held numerous open houses and Wildfire Safety Fairs to educate the community on the purpose, process, and impacts of de-energization, as well as how to manage safely through a PSPS event. SDG&E hosted these events in some of the communities within SDG&E's service territory that have been the most impacted by previous de-energization events.² SDG&E utilized these events to provide customers with information on SDG&E's PSPS program, assistance with updating their contact information for PSPS notifications, meteorology overviews on situational awareness, guidance on how to get current information during events, and information on additional resources, such as Community Resource Centers and generator safety. SDG&E also hosted representatives from the American Red Cross, local Fire Safe Councils, the Community Emergency Response Team (CERT) Program, 2-1-1 San Diego, California Department of Forestry and Fire Protection (CAL FIRE), County of San Diego Office of Emergency Services (County OES), and tribal fire departments to provide information and education on emergency preparedness. Additionally, SDG&E Emergency Management has provided PSPS informational updates to all fire and law enforcement agencies in San Diego County as part of its ongoing First Responder training and exercise program.

As mentioned above, SDG&E is in the final stages of production of a PSPS Policies and Procedures document, which includes an outline of communication tactics to reach customers. SDG&E expects the PSPS Policies and Procedures will be finalized and made publicly available in September 2019. The document will serve as an important resource for the public, local governments and agencies, along with other key stakeholders, by providing detailed background on SDG&E PSPS events. In addition, the document provides an overview of SDG&E's PSPS policies, the considerations utilized for real-time situational awareness and decision-making, as well as information on the stages of a PSPS event and the activities related to each stage. The document also outlines the notification process for customers and critical stakeholders, including how parties will be notified and how to prepare for an outage, and explains the difference between an unplanned outage and outage related to a PSPS event.

In addition to publishing the PSPS Policies and Procedures document, SDG&E is directly engaging with customers to educate them on PSPS and how to prepare for potential events. SDG&E's multi-pronged approach for its customer education campaign helps to convey the

² SDG&E hosted open house events in Boulevard, Pine Valley, Potrero, Ramona, Valley Center and Ramona Springs. SDG&E has also held, or intends to hold, three Wildfire Safety Fairs in Alpine, Ramona, and Valley Center.

important messaging to the maximum number of customers in a manner that is relevant and easy to understand. These methods include:

- Digital ads and paid search engine marketing;
- Paid social media posts and ads;
- Print advertising—multilingual (eight languages);
- Direct mail—annual safety newsletter to High Fire Threat District customers;
- Bill inserts to all customers;
- Wildfire safety documentary, “Everything in Our Power”, available on SDG&E’s PSPS website and will be aired throughout the service territory on broadcast television.

Once SDG&E activates its PSPS protocols, customer notifications will be sent via SDG&E’s Enterprise Notification System, which attempts to notify customers using multiple modes/channels of communication (voice, email and text), regardless of their location. SDG&E’s customer notifications are informative and easy to understand. Additionally, the notifications are translated and communicated in the following eight languages: English, Spanish, Mandarin, Cantonese, Korean, Vietnamese, Tagalog and Russian. Messaging will also be provided to the media, public safety partners, public officials, government agencies, and the County Access and Functional Needs (AFN) network for amplification.

SDG&E is working with several statewide and local Community Based Organizations (CBOs) to educate customers—including AFN populations—about PSPS events. SDG&E is also developing a toolkit that includes PSPS information and relevant program information (California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), Energy Savings Assistance (ESA) and Medical Baseline (MBL)), which CBOs will be able to share through newsletters, social media, presentations and at events.

The statewide public education campaign launched on May 5, 2019 and is in market through November 2019. The statewide public education campaign has been a collaborative effort between the IOUs, the California Office of Emergency Services (Cal OES) and CAL FIRE, with ongoing weekly and bi-weekly meetings. The goal of the campaign is to help all Californians understand the criteria and reasons for PSPS events and how to prepare for them. The overarching campaign objectives are to: adopt consistent PSPS messaging across the state; build awareness and understanding of the potential impacts of PSPS events; capture customers contact data for PSPS notifications; encourage customers to plan and prepare to mitigate PSPS impacts; ensure vulnerable populations are prepared for PSPS; and include metrics for effectiveness.

The core elements of the campaign achieved to date include: establishment of common terminology for actions before and during a PSPS; branding of the statewide messaging and media campaign; agreement on common preparedness actions for the public to take; and creation of a website to serve as a central repository and information center for communities.

The statewide campaign leveraged mass media to build awareness and recognition rapidly, including video, radio, digital media, social media and the statewide PSPS website.

The statewide campaign includes the following focus areas, in which all content is translated and made available to the public in multiple languages (English, Spanish, Mandarin, Cantonese, Korean, Vietnamese, Tagalog and Russian):

- Climate Change and the impacts of increased risk of wildfire;
- Description of a PSPS;
- How to prepare for a PSPS, including guidance for developing a personal safety plan and an emergency supplies kit;
- Guidance to the population who is dependent on electric medical devices and recommendations of what should be included in their plan;
- What the public should expect if a PSPS occurs, including early warning notifications overview, ongoing updates, performance of required safety inspections and power restoration;
- Overview of when a PSPS may occur and the considerations and factors considered by utilities;
- The potential duration of a PSPS event;
- Comprehensive list of resources available to the public statewide and regionally across the state;
- A call to action to sign up for PSPS notifications;
- A reference to each electric utility's PSPS webpage for their specific PSPS protocols, notification processes and timelines.

Key statewide campaign accomplishments include:

- Statewide press release, development of PSPS talking points and frequently asked questions and answers;
- Translated radio spots in Spanish, Vietnamese, Mandarin, Cantonese and Korean;
- The statewide PSPS website achieved Americans with Disabilities Act (ADA) certification and includes discussions specific to the AFN population;
- The statewide website, prepareforpowerdown.com, was launched in multiple languages and includes various brochures and fact sheets on topics, including: PSPS overview, wildfire mitigation and grid resiliency, portable generators, building community resiliency, PSPS emergency preparedness, defensible space, updating contact information with the IOU, an ADA-specific fact sheet, PSPS resources for CBOs, and local emergency alert notification system;
- Social media campaign includes Facebook, Twitter and Instagram and media streaming;
- Customer focus groups to obtain feedback on PSPS preparedness and response measures.

B. Coordinating with State and Local Jurisdictions and Agencies

SDG&E maintains strong relationships with the agencies and jurisdictions within its service territory, as well as with statewide agencies and regulators, including Cal OES and CAL FIRE. SDG&E recognizes the importance of collaborating with these stakeholders before, during, and after PSPS events. SDG&E has worked diligently to integrate its warning programs with those of the agencies and jurisdictions with a role in making emergency public notifications. Within this section, SDG&E highlights its efforts in these areas, including its work on the statewide public education and outreach campaign, work with local governments on supplementary notifications, and engagement with the other IOUs to share information and develop best practices.

SDG&E's Regional Public Affairs group conducts significant outreach with local impacted jurisdictions at the elected and staff level, including the County of San Diego, cities and tribal governments. SDG&E regularly provides tours of its EOC and Weather Center to elected officials and government staff to educate them on weather tools, climate science, emergency operations, and PSPS events. Year to date, SDG&E has hosted 85 local elected officials and their staff, representing 24 jurisdictions, including tribal governments. This year, SDG&E also provided a tour to California Governor Gavin Newsom and his staff, as well as the staff of a United States Senator. Additionally, SDG&E has educated 76 different community partners, such as business organizations and chambers, about PSPS events and preparation. SDG&E Public Affairs Managers meet with government elected officials and staff and offer PSPS education, including SDG&E expert meteorologists that meet with jurisdictions in its service territory to demonstrate the weather tools SDG&E uses related to forecasting and monitoring PSPS events.

SDG&E's Emergency Management, Regional Public Affairs, and AFN outreach team have met with County OES leadership to supplement the SDG&E notifications to the public. SDG&E notified Cal OES of its work with local governments to successfully integrate non-duplicative consistent notification protocols. To support this effort, local agencies and jurisdictions will use SDG&E messaging to reduce confusion. County OES has agreed to use the following modalities for amplification of the messages:

- Repost SDG&E social media (Twitter and Facebook);
- Include a link to the sdge.com PSPS website in all social media messages;
- Utilize their Partner Relay program which is a system of over 300 CBOs that who have agreed to translate and disseminate emergency messages;
- Include PSPS information in their *SD Emergency* mobile application.

C. Coordinating with Other Electric IOUs

SDG&E staff from multiple functional groups participate in weekly and bi-weekly calls with the other electric IOUs to align messaging and share best practices.

III. Adopted Definitions

SDG&E continues to partner with local governments and Public Safety Partners, especially those located in the High Fire Threat District, to identify and include critical infrastructure in notifications. SDG&E has partnered with the San Diego County Fire Chiefs' Association, San Diego Police Chiefs and Sheriffs Association, County of San Diego Public Health Services, County of San Diego Environmental Health, the San Diego Law Enforcement Coordination Center, Regional Emergency Managers Working Group, and their sub-departments to collaborate on integration of lists.

The California Department of Public Health is assisting SDG&E in the identification of licensed health care facilities in SDG&E's service territory and has provided information from the State's licensing database. The County of San Diego's Health & Human Services agency has partnered with SDG&E to assist in identification of the Public Health Departments critical facilities/infrastructure.

SDG&E is prepared to partner with the Commission to develop a comprehensive list of types of critical facilities and critical infrastructure during Phase 2 of this proceeding.

IV. Who Should Receive Notice and When Should Notice Occur?

A. Notification and Priority

SDG&E has developed scripting and modified its systems to facilitate, when possible, the advance notification of a PSPS event to all populations potentially affected. SDG&E's Enterprise Notification System sends pre-scripted advance messaging via texts, emails, and voice messages in multiple languages. Additionally, information will be posted on SDG&E's website, also available in multiple languages. SDG&E will utilize the approaches described below to provide priority notification to the stakeholders enumerated in the Guidelines at A7.

As a best practice, SDG&E provided advanced notification of past de-energization events to many of the groups now defined by D.19-05-042 as "Public Safety Partners."³ For these past events, SDG&E provided situational awareness and resources for additional information to emergency management, jurisdictions, and community partners that benefit from advanced notice of potential de-energizations.

In preparation for the 2019 wildfire season, SDG&E refined its communications practices in response to D.19-05-042. SDG&E updated its Public Safety Partner database and continues to maintain and revise contact information as necessary. SDG&E has a process in place to provide email communication to Public Safety Partners as early as 72 hours in advance of an event and

³ D.19-05-042 at A4. Throughout this Report, references to Public Safety Partners includes local jurisdictions.

can provide email communication to its Public Safety Partners throughout and at the end of an event, in alignment with the timeline set forth within the de-energization guidelines.

Public Safety Partners cover a broad group of partnerships and relationships and as a best practice, SDG&E will communicate additional information beyond this timeline when partners would benefit (e.g., twice during an operational period during longer events). Other best practices SDG&E may deploy involve the ability to call and text certain Public Safety Partners that may benefit from this means of communication and providing additional advanced notification to Community Partners. SDG&E defines Community Partners as Fire Safe Councils, CERTS, Chambers of Commerce and regional planning groups. As a best practice, SDG&E has communicated with—and will continue to communicate with—these Community Partners in advance of de-energization events.

To amplify SDG&E's PSPS notifications and reach AFN populations, SDG&E is working with statewide and local CBOs who have databases of AFN constituents' contact information. CBOs willing to participate will help amplify the SDG&E PSPS outage notification messaging to their AFN constituents. Additionally, SDG&E engages its MBL customers to re-certify for the program and update their preferred contact information and provide alternative means of communication.

B. Timing of Notification/ Responsibility for Notifications

As conditions permit, SDG&E attempts to provide notice of de-energization as early as SDG&E reasonably believes a de-energization is likely. SDG&E is in ongoing communications with Cal OES on its notification strategy and in parallel is working with local and tribal governments to ensure that notification protocols are integrated with the goal of having local governments provide supplemental or secondary notifications utilizing pre-designed templates or scripts developed by SDG&E. SDG&E staff met with the County OES in early July to discuss the new Guidelines and ongoing opportunities for customer notifications. The County OES agreed to amplify SDG&E notifications using a variety of modalities. SDG&E will continue to work with local and tribal governments within the service territory to refine supplemental/secondary notifications strategies and templates.

V. How Should Different Customer Groups be Identified?

A. First/Emergency Responders/Public Safety Partners

SDG&E attributes great value to its relationships with first/emergency responders and Public Safety Partners within its service territory and maintains robust contact lists, which it updates regularly, for these stakeholders. SDG&E has taken the steps below to confirm the identity of these partners and to continue to grow these relationships.

SDG&E worked with Public Safety Partners to identify appropriate primary, secondary, and when possible, tertiary, 24-hour points of contact, including preferred secondary means of

communication. SDG&E also developed a one-page flyer for Public Safety Partners which includes three 24-hour SDG&E contacts for their use. The three 24-hour contacts represent specific functional areas (emergency, fire, liaison officer) so each partner type has contact information of an SDG&E representative that is uniquely qualified to support their needs. Additionally, SDG&E identified clear points of contact at the Commission, Cal OES, and CAL FIRE. SDG&E will update all contact lists at least two months in advance of the start of each wildfire season. SDG&E will also conduct communication exercises prior to each wildfire season to confirm its ability to rapidly disseminate information. Finally, SDG&E will work with Public Safety Partners to encourage proactive updating of contact point information in the event of a change.

B. Critical Facilities and Infrastructure

SDG&E recognizes the importance of open two-way communication with the operators of the critical facilities and infrastructure within its service territory before, during, and after PSPS events and has identified and built relationships with these stakeholders. SDG&E has identified the critical facilities in its service territory utilizing the Guidelines' definition of critical facilities. SDG&E took actions to understand critical facilities' ability to operate during an emergency with direct conversations, and information about back-up generation was provided in both the email and direct mail piece to newly identified critical customers. Additionally, SDG&E has coordinated with first/emergency responders to identify all their critical facilities. SDG&E is prepared to coordinate with first/emergency responders and local governments to review its list of critical facilities. SDG&E incorporates workshops, presentations, and direct meetings to address and assess backup generation needs for critical facilities.

SDG&E has contacted local jurisdictions to collect at least two contacts for Emergency Managers (EOCs), Fire, and Law Enforcement departments. SDG&E also developed a one-page flyer for Public Safety Partners which includes three SDG&E contacts for their use. The flyer also provides instructions on how to update their contact information if there are any changes throughout the season.

C. Access and Functional Needs Populations

SDG&E is partnering with statewide and local CBOs to identify AFN populations within its service territory. Through introductions and working directly with Cal OES, SDG&E has begun working with several statewide CBOs with a presence in SDG&E's service territory to reach the AFN population. In addition, SDG&E has partnered with the County of San Diego's AFN Working Group to collaborate with several local CBOs that work directly with members of the AFN population. SDG&E is creating a toolkit that includes PSPS information and program information (MBL, CARE, FERA and ESA) that the CBOs will be able to share through their newsletters, social media pages and at events and presentations. Through these partnerships the CBOs will share this messaging and encourage members of the AFN population to register for the MBL, CARE, FERA or ESA programs. SDG&E is expanding its partnership with County OES

by inserting two pages of information about PSPS, back up generation needs, the MBL, ESA, CARE and FERA programs into their “Disaster Preparedness Plan for People Who May Need Assistance and Their Caregivers.” SDG&E is also planning to staff an SDG&E table at County OES’ upcoming AFN Symposium. Additionally, SDG&E has partnered with the Regional Disaster Healthcare Coalition and Residential Care Facilities for the Elderly to ensure they are integrated into the AFN notification process.

In addition to the new partners SDG&E has begun to work with, SDG&E also works closely with a previously established network of over 190 CBOs to connect customers to programs. This group is called the Energy Solutions Partner Network. These organizations represent the diversity of SDG&E’s customers within its service area. Most of these organizations are small, grassroots agencies and serve customers that fall within the AFN population definition. These partners help educate and enroll customers in programs utilizing a variety of tactics including messaging through e-mail and social media channels, such as Facebook, Twitter, and Instagram, posting information on their websites, providing booth space at events and hosting enrollment day fairs at their locations.

Annually, SDG&E sends a letter to all “non-permanent” MBL customers requesting that they re-certify for the program and requesting customers update their preferred contact information, as well as, to provide an alternative means of communication. SDG&E is also currently working on a letter to be sent to all customers enrolled in the MBL program encouraging customers to update their contact information and provide an alternative means of contact. Although this information is on the MBL application, the letter will provide another touchpoint requesting customers to update their information. This letter is scheduled to be sent in Q3 2019.

D. All Other Customers

SDG&E takes a multi-faceted approach to notifying people of potential and active PSPS events and has done so for each PSPS event in its service territory. Even prior to Resolution ESRB-8’s more robust notification requirements, SDG&E deployed text, voice, and email messaging leading up to and during PSPS events and took extra steps, including attempted in-person notification when necessary, for its MBL customers. SDG&E recognizes the impact a loss of power can have on its customers, so SDG&E will continue to prioritize notification as a mitigation measure. This section highlights the efforts SDG&E has undertaken to engage local jurisdictions and utilize all methods available to notify people potentially affected by an SDG&E PSPS event.

SDG&E has and will continue to work with local jurisdictions to discuss improvements that can be made to identify and communicate with all people within a de-energization area. To date, SDG&E has a strong system in place, described above, that delivers messages to those impacted through many forms of communication, including using local jurisdictions to amplify messages through their respective social media sites. SDG&E has also reached out to its local jurisdictions to confirm they have the right jurisdictional contacts in its database. SDG&E will continue to hold

meetings with local jurisdictional leaders in government and emergency management to discuss enhancements to identify and communication.

SDG&E Business Services has reached out to all critical facilities via email and/or phone to request up-to-date contact information.

SDG&E is working with statewide and local CBOs to educate and encourage customers, including AFN populations, to update their contact information on their SDG&E Account.

Since the Commission issued D.19-05-042, SDG&E has been actively evaluating different options for communicating with people not listed on utility accounts. At this point, SDG&E is working to leverage the self-registration portal of its existing Motorola Vesta Emergency Notification System. This portal will enable people not directly listed on utility accounts to create an authenticated account and opt-in for de-energization notifications by zip code(s). They may receive notifications by voice, text and e-mail. They will use this account to maintain their notification preferences, as well as the ability to opt-out of notifications. SDG&E believes that using its existing ENS provides a highly scalable solution that fits in well with current customer notification business processes.

Based on current timelines and development progress, SDG&E expects to have this solution available on its website (sdge.com) in the September 2019 timeframe.

VI. What Information Should be Included in Notifications in Advance of and Directly Preceding a De-Energization Event?

A. Advanced Outreach & Education

SDG&E has been reaching out to and educating its customer base and local jurisdictions about wildfire safety and the potential for PSPS events for many years. SDG&E recognizes that education and outreach increase preparedness, which helps mitigate the impacts of PSPS events on customers and local communities. SDG&E has approached customer and local jurisdiction education in a manner designed to reach the greatest number of recipients in the most effective manner; this has included presentations at town hall meetings, open houses and Wildfire Safety Fairs, tours of its EOC and Weather Center, sharing information on the SDG&E website, and sending out mailers. SDG&E is also participating in a statewide education and outreach campaign.

Over the last decade SDG&E has been collaborating with stakeholders in the wildfire community, such as the National Weather Service and fire agencies who issue alerts and products such as the Red Flag Warning and Santa Ana Wildfire Threat Index (SAWTI). SDG&E uses these tools to define conditions that represent an extreme fire hazard in the SDG&E service territory. A Red Flag Warning is issued by the National Weather Service when the combination of strong winds, low humidity, and dry vegetation results in the potential for critical fire weather conditions. The SAWTI is a rating of the severity of the fire environment

based on the strength, duration, and extent of Santa Ana winds, the humidity, and vegetation dryness. SDG&E generates what is known as the Fire Potential Index (FPI), which is an analytical tool that is used to assess the fire environment and convey the potential for large wildfires. The FPI is an indicator for “extreme fire hazard” in the SDG&E service territory. The FPI operates on a scale from 1-17, with 15-17 representing extreme fire hazard conditions.

Thresholds for strong wind events can vary greatly across SDG&E’s service territory, as some areas are prone to windy conditions on a frequent basis while other areas rarely see strong winds. SDG&E has approached this challenge from a “local known conditions” perspective and uses historical weather data to make localized determinations of what would be considered a strong wind event on a community by community basis. An analysis of historical weather observations from SDG&E weather stations was performed and percentiles were calculated to determine what constitutes an unusually strong wind gust for each community. For any given weather station, an unusually strong wind is defined as any gust that meets or exceeds its 99th percentile value, meaning that the wind gust is within the top 1% of all measured Santa Ana wind gusts at that location.

SDG&E has developed a secure transfer for GIS files for our Public Safety Partners and, if requested, will provide relevant GIS data, including identification of critical facilities, circuits, and number of MBL customers, to local jurisdictions in advance of wildfire season. SDG&E is in the process of working with the Public Safety Partners to determine the appropriate contact to receive the files. This information is used for operational coordination between Public Safety Partners and SDG&E during the pre-planning phase to ensure operational readiness.

SDG&E provides and makes available information and situational awareness about de-energization in multiple ways. SDG&E has a Public Safety Power Shutoff Policies and Procedures document which includes considerations taken into account prior to a shutoff, outlines the Public Safety Power Shutoff process, and addresses SDG&E’s notification process to customers, non-customers and other critical stakeholders. Additionally, resources available to the community are provided, including the availability of Community Resources Centers. It also addresses the difference between an unplanned outage and an outage related to a Public Safety Power Shutoff.

SDG&E has developed a 30-minute documentary entitled “Everything in Our Power.” This documentary is a comprehensive review of the SDG&E’s wildfire preparedness program and includes a discussion of the importance of the Public Safety Power Shutoff program. It also incorporates key public safety partners and members of the public impacted by Public Safety Power Shutoffs in the region. The documentary will air on local TV stations throughout the service territory beginning September 2019. The documentary will be promoted in local newspapers, movie theaters, and local television stations.

The SDG&E website also has a dedicated Public Safety Power Shutoff section, to which the public along with public safety partners are driven to as part of our public education campaign.

SDG&E also drives the public and Public Safety Partners to this section of the website prior to initiating a Public Safety Power Shutoff event.

Public Safety Power Shutoff collateral materials are provided to customers via direct mail and made available to the general public during outreach events such as community town halls, wildfire safety fairs, meetings with government agencies, CBOs, public officials, and Public Safety Partners.

The statewide public education campaign was launched on May 5, 2019 and is currently in market through November 2019. The statewide public education campaign has been a collaborative effort between the IOUs, Cal OES, and CAL FIRE with ongoing weekly and biweekly meetings to ensure use of best practices outlined in the California Alert and Warning Guidelines. These ongoing weekly and bi-weekly meetings have included strategic subject matter experts from the IOUs, Cal OES including representatives from statewide AFN populations as well as state and regional representative of CAL FIRE. The collective work has helped ensure the education campaign is tailored to meet the needs of stakeholders.

The statewide campaign drives to the dedicated website prepareforpowerdown.com. The campaign makes the public aware of how to prepare for and obtain information during prolonged power loss, including a Public Safety Power Shutoff by addressing the following:

- Description of a Public Safety Power Shutoff;
- Provides information for developing a personal safety plan and an emergency supplies kit;
- Guidance to the population who is dependent on electric medical devices and recommendations of what should be included in their plan;
- What the public should expect if a Public Safety Power Shutoff occurs, including early warning notifications overview, ongoing updates, performance of required safety inspections and power restoration;
- Overview of when a Public Safety Power Shutoff may occur, and the considerations and factors considered by utilities;
- The potential duration of a Public Safety Power Shutoff event;
- Comprehensive list of resources available to the public statewide and regionally across the state;
- A call to action to sign up for Public Safety Power Shutoff notifications.

The statewide website refers the public to each electric utility's Public Safety Power Shutoff webpage for their specific Public Safety Power Shutoff protocols, notification processes and timelines. As such, the statewide campaign satisfies the requirement of using best practices from the State of California Alert & Warning Guidelines for public notifications by relying on each IOU's notification process. It is at the local IOU level that this requirement is satisfied. SDG&E's Public Safety Power Shutoff notification process aligns with the State of California Alert & Warning Guidelines by providing alert and warning notifications as outlined in the

Guidelines. SDG&E's alert notification attracts attention to the public safety power shutoff event and drives to the SDG&E website for safety and preparation information. The warning notification informs and encourages the public to take protective actions such as activating their emergency plan. SDG&E makes additional notifications, beyond what is outlined in the Statewide Alert & Warning Guidelines, by notifying the public upon initiating a power shutoff, upon activation of community resource centers, when patrolling and safety inspections have begun, when power has been restored, and upon even conclusion.

SDG&E collaborated with public safety partners to develop and refine messaging scripts (templates) leading up to, during and after a de-energization event. This work has also been part of the weekly and bi-weekly meetings between IOUs, Cal OES, and CAL FIRE. These script templates are shared with Public Safety Partners and key stakeholders before, during, and after a de-energization event for sharing/amplification. As outlined above in the discussion of the alert and warning notification protocols, the script notification templates are aligned with Common Alerting Protocol used by the State Alert Guidelines utilized by Cal OES and CAL FIRE. Another byproduct of the collective work between the IOUs, Cal OES, and CAL FIRE has been the developments of a statewide Glossary of Terms. This document defines terms and abbreviations commonly used across the State during a Public Safety Power Shutoff event. The document is housed and made available through the Response Documentation Division of Cal OES.

The IOUs, in coordination with Cal OES and CAL FIRE are currently measuring the effectiveness of the statewide campaign by primarily looking at the cumulative traffic that goes to the statewide website (prepareforpowerdown.com). Each IOU will also measure the campaign reach in their service territory for each tactic utilized (radio and digital buys). The statewide campaign is measuring traffic to the website only. It does not measure the IOU's local campaign effectiveness which ultimately support the goals of the statewide campaign.

B. Notification Preceding a De-Energization Event

SDG&E attempts to provide as much notice as possible to its Public Safety Partners, including local jurisdictions, and all others potentially affected by a PSPS event. A strong, working relationship with Public Safety Partners that includes open two-way communication before a PSPS event is crucial to effectively and safely employing PSPS events as a last resort measure to mitigate wildfire risk. In turn, SDG&E prioritizes these relationships and strives to provide timely meaningful communications to its partners and has developed template email communications that provide all required information to its Public Safety Partners at the Priority Notification mark.

SDG&E has developed a secure transfer for GIS files for its Public Safety Partners and is in the process of working with the Public Safety Partners to determine the appropriate contact to receive the files. SDG&E is working towards being able to provide a secure data transfer of the

PSPS boundary in GIS-REST format (or other agreed-upon format) with the eventual aim of sharing real-time data with Public Safety Partners.

Scripts have been developed for customer communications and will be shared with Public Safety Partners to amplify to their constituents. These communications direct recipients to sdge.com for situational awareness and specific details about Public Safety Power Shutoff event, including notification and communication timeline, the outage map, and event updates through the SDG&E NewsCenter platform. Messaging will include information about:

- Source (SDG&E)
- Threat
- Does this affect my location?
- What should I do?
- Estimated duration

Additionally, messaging directs customers to the SDG&E PSPS dedicated webpage to obtain education and outreach disseminated prior to the 2019 wildfire season. SDG&E will provide up-to-date information, including a depiction of the boundary of the de-energization event, on its website homepage and dedicated PSPS page.

SDG&E will share on its website and in communications a 24-hour means of contact that customers may use to ask questions and/or seek information.

VII. What Methods Should the IOUs Use to Communicate a De-Energization Event with the Public?

SDG&E has developed a notification strategy designed to reach the greatest number of people. SDG&E's strategy has been developed with input from local and state Public Safety Partners to improve its effectiveness.

Several communication platforms will be utilized during a Public Safety Power Shutoff event including the SDG&E website, social media, media outreach and Enterprise Notification System (voice, text and email). This messaging will reach the various stakeholders (customers, local and state Public Safety Partners, jurisdictions, AFN populations and organizations that serve them, etc.). Notifications will be delivered in English, Spanish, Chinese (Mandarin and Cantonese), Tagalog, Vietnamese, Korean and Russian. SDG&E has developed protocols for communicating with affected customers before, during and after Public Safety Power Shutoff events. These protocols are found in SDG&E's Public Safety Power Shutoff policies and procedures document which will be posted on the SDG&E website, along with other collateral materials that have been distributed as part of the public education campaign and housed on sdge.com. These materials are made available to the public and Public Safety Partners.

VIII. How Should the IOUs Communicate and Coordinate with Public Safety Partners Before and During a De-Energization Event?

A. Coordinating with Public Safety Partners

SDG&E will contact local public safety officials in impacted and adjacent jurisdictions prior to and during events, consistent with SEMS and with the Guidelines. SDG&E collaborated with Public Safety Partners to develop and refine messaging scripts (templates) leading up to, during and after a de-energization event. This work has also been part of the weekly and bi-weekly meetings between IOUs, Cal OES, and CAL FIRE. These script templates are shared with Public Safety Partners and key stakeholders before, during and after a de-energization event for sharing/amplification. As outlined above in the discussion of the alert and warning notification protocols, the script notification templates are aligned with Common Alerting Protocol used by the State Alert Guidelines utilized by Cal OES and CAL FIRE.

At a minimum, SDG&E will communicate via email with local jurisdictions before, during, and at the conclusion of an event consistent with the timeline outlined in the Guidelines. For SDG&E's jurisdictions, including tribal governments, SDG&E will continue to communicate with elected officials and key government staff, such as city managers. SDG&E will also communicate with local jurisdictions' emergency managers and emergency first responders. SDG&E will also, at a minimum, communicate via e-mail with impacted state and federal jurisdiction public officials, CAL FIRE, and Cal OES before, during, and at the conclusion of an event consistent with the timeline outlined in the Guidelines. Depending on the event and the circumstances of the event, SDG&E will also provide additional communications to these groups in terms of frequency and method of communication when SDG&E believes additional communications would benefit the jurisdictions.

SDG&E has also been working with its Public Safety Partners and jurisdictions to educate them on PSPS events in advance of activations. Examples of what SDG&E has done to educate its Public Safety Partners include but are not limited to: Weather Center and EOC tours described above; creation of a templated presentation to explain PSPS events and recent changes to communications to Public Safety Partners; and meetings with Public Safety Partners to provide education and outreach and answer questions that Public Safety Partners may have about PSPS events. SDG&E has met with local jurisdictions, water and telecommunications contacts, and AFN groups to provide this information, answer questions, look for opportunities for improvement and to collaborate on amplification of event messaging.

SDG&E has worked with several statewide and local AFN groups to make sure they are educated about PSPS events and get their clients/constituents signed up for outage notifications and enrolled in the MBL program. SDG&E is working closely with local CERT groups and sheriff's departments who regularly perform welfare checks on some of the most vulnerable population in their neighborhoods to ensure they are well educated on PSPS.

SDG&E has worked closely with County OES as they continue to develop a new pilot program for select CERT members called Neighborhood Evacuation Team (NET) who would perform outreach to AFN population members in their community. SDG&E will work to make sure the volunteers are informed about all programs that customers may be eligible for including MBL.

SDG&E has an affirmative notification process in place for its MBL and life support customers who require electricity. Automatic notifications go out to these customers and if a positive receipt is not received from this customer group, then SDG&E's customer contact center will manually dial the customer. If there is still not a positive receipt, then SDG&E will send a field representative to the customer's address to provide an in-person check. If no one answers the door then the field representative will leave a door hanger with emergency contact information.

SDG&E maintains open lines of communication with Public Safety Partners during PSPS events and will address requests for a de-energization delay from Public Safety Partners on a case-by-case basis.

B. Coordinating with Emergency Operation Centers and Incident Command Systems

SDG&E has a dedicated desk for both Cal OES and County OES liaisons in its EOC. Additionally, SDG&E has a dedicated seat in the County OES EOC and is prepared to embed a liaison in the Cal OES EOC if required.⁴ SDG&E will also facilitate a situation-status Executive Call with the SDG&E Company Utility Commander and Cal OES once every operational period. SDG&E will have a designated lead with decision-making authority located at its EOC at all times during a PSPS event.

SDG&E has strong partnerships with the telecommunications providers and water/wastewater districts in its service territory and already has a notification strategy in place that worked well with the telecommunications providers during PSPS events in 2018. SDG&E will implement that same notification strategy with water/wastewater districts. SDG&E will make seats available in its EOC for telecommunications providers and water/wastewater districts in its service territory if requested.

IX. What Information Should be Included in Post-Event Reporting

To date, SDG&E has not implemented a Public Safety Power Shutoff in 2019, and as such, has not yet served a post-event report conforming to the requirements of D.19-05-042.

To prepare for future PSPS events and required reporting, SDG&E has developed a template for post-event reports and has identified the appropriate personnel to provide the information required by Resolution ESRB-8 and D.19-05-042. Additionally, SDG&E has developed new

⁴ In August 2019, SDG&E liaisons met with County OES to tour the County's EOC.

internal tools and protocols to ensure all data required in post-event reporting is collected during PSPS events.

SDG&E has created a webpage on [SDGE.com](https://www.sdge.com) dedicated to Public Safety Power Shutoffs, where future post-event reports will be made available to the public. SDG&E's Regional Public Affairs, Emergency Services and Business Services Departments have prepared contact lists to complete outreach to Public Safety Partners and encourage feedback on post-event reports.

X. De-Energization of Transmission Lines

Consistent with D.19-05-042, SDG&E has developed the following interim protocols for the de-energization of transmission lines.

I. Seven-Day Weather Forecast

SDG&E's meteorology department consistently monitors the weather within its service territory and publishes a daily rolling seven-day forecast of the potential for wind events and wildfire conditions. This includes publishing the Fire Potential Index (FPI), which classifies the fire potential within SDG&E's service territory based on weather and fuel conditions as well as the historical fire occurrences within each of SDG&E's operating districts. If the FPI is rated "extreme" and the potential for high winds is forecasted to be high, SDG&E's Grid Control will evaluate and monitor the outage schedule to determine if there are planned outages within the area anticipated to be affected by weather that may need to be recalled or rescheduled. At seven days prior to a potential de-energization event (also referred to as a Public Safety Power Shut-off (PSPS) event), the forecast is likely to change as weather conditions materialize. As such, Grid Control typically does not take action to de-energize transmission lines at this time.

II. 48–24 Hour Forecast

When extreme fire weather conditions are imminent (FPI rated "extreme") or a Red Flag Warning is officially declared by the National Weather Service – which occurs no more than 48 hours prior to a PSPS event. Prior to de-energization, Grid Control will communicate with the California Independent System Operator (CAISO) that there is a likelihood for a PSPS event. Grid Control will communicate the following information to the CAISO via an outage request entered into the CAISO Outage Management System (OMS): lines expected to be de-energized; expected time and duration of de-energization; load impacts - including number of customers if known; and generation impacts.

The CAISO will utilize the information in the outage request to study the impact to the bulk electric transmission system and determine if additional resources need to be procured to meet electric system demand in the event of generation loss or adjust resources for decreased demand for load drops due to PSPS.

If a transmission line that may experience an outage will likely have an impact on adjacent operating entities, Grid Control will notify such adjacent entities of the likelihood of a de-energization event to allow them to manage load during the event. Those entities may include:

- Southern California Edison (SCE)
- Imperial Irrigation District (IID)
- Centro Nacional de Control de Energía (CENACE)
- Arizona Public Service (APS)

In addition, Grid Control will notify SDG&E's Business Services department regarding any transmission connected customers that may be impacted by the de-energization of transmission lines. Business Services would provide notifications consistent with the De-Energization guidelines outlined in California Public Utilities Commission (CPUC) Decision (D.) 19-05-042. SDG&E will always comply with the FERC standard of conduct, unless a transmission emergency warrants suspending the standard of conduct.

Prior to the advent of the weather event causing potential de-energization, SDG&E will identify any transmission lines that are in abnormal conditions due to construction or maintenance activities, assess the risk of leaving those lines energized, and determine under what conditions those lines may be de-energized, which may be more conservative than lines in optimal condition. In addition, SDG&E will perform pre-patrols of all transmission lines expected to be impacted by high winds to determine the condition of each line and if more conservative operating restrictions need to be put into place.

III. Day of PSPS Event/De-Energization

During the PSPS event, SDG&E will monitor weather and fire potential conditions via its weather network and a team of observers in the field to determine if conditions are severe enough to warrant de-energizations. When de-energization is imminent, Grid Control will notify the CAISO (and adjacent entities where appropriate) that transmission lines are being de-energized. SDG&E's Emergency Management department will coordinate with the Governor's Office of Emergency Services (Cal OES), the California Department of Forestry and Fire Protection (CAL FIRE), Public Safety Partners, and local jurisdictions for any transmission de-energizations as appropriate. SDG&E will also notify affected parties and the CPUC of the de-energization and the customer impact associated with it in accordance with the PSPS notification requirements described in D.19-05-042 and CPUC Resolution ESRB-8.

Where necessary and appropriate, Grid Control will coordinate with state and local fire agencies to de-energize lines for personnel safety when fighting fires and perform the same notifications as above.

IV. Re-Energization

Once the PSPS event is concluded, SDG&E will determine that the transmission lines are ready to return to service, which may include patrols of the affected transmission lines that were de-energized as part of the PSPS event and conducting any repairs that are deemed necessary to restore the lines to operable condition. Once patrols and/or repairs are complete, Grid Control will notify the CAISO, adjacent entities, and Business Services of the intent to re-energize and perform an additional notification to these groups once the lines are back in service. Business Services would provide notifications consistent with the De-Energization guidelines outlined in D.19-05-042.