



Meredith E. Allen
Senior Director
Regulatory Relations

77 Beale Street, Room 2341
San Francisco, CA 94105

Mailing Address
Pacific Gas and Electric Company
P.O. Box 770000
Mail Code: B23A
San Francisco, CA 94177

Tel.: 415-973-2868
Meredith.Allen@pge.com

March 4, 2019

Leslie Palmer
Director, Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA, 94102

Dear Mr. Palmer:

In accordance with Ordering Paragraph 3 of California Public Utilities Commission (CPUC) Decision (D.) 19-05-042, Pacific Gas and Electric Company (PG&E) respectfully submits its second progress report on the implementation of the guidelines set forth in Appendix A.

If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink that reads 'Meredith E. Allen'. The signature is written in a cursive, flowing style.

Meredith E. Allen
Senior Director – Regulatory Relations

Enclosures

cc: Caroline Thomas Jacobs, Wildfire Safety Division
Rachel Peterson, Safety Policy Division
ESRB_ComplianceFilings@cpuc.ca.gov



*Pacific Gas and
Electric Company*[®]

Pacific Gas and Electric Company Progress Report on Implementation of De-Energization Guidelines

March 4, 2020

Table of Contents

| | |
|--|-----------|
| List of Figures | ii |
| 1 Executive Summary | 1 |
| 2 Operational Updates | 2 |
| 2.1 Thresholds for Strong Wind Events | 2 |
| 2.2 De-Energization of Distribution Lines | 3 |
| 2.3 De-Energization of Transmission Lines | 3 |
| 2.4 Reducing the Impacts of PSPS..... | 4 |
| 3 Outreach | 5 |
| 3.1 Coordination with Public Safety Partners, Communities and Customers | 5 |
| 3.1.1 Statewide Public Education and Outreach Campaign..... | 5 |
| 3.1.2 Direct Customer Outreach | 6 |
| 3.1.3 Outreach to Public Safety Partners..... | 12 |
| 3.1.4 Identification and Outreach to Critical Facilities and Critical Infrastructure | 14 |
| 3.1.5 Backup Power Support..... | 15 |
| 3.2 Outreach and Support for Medical Baseline/Access and Functional Needs | 17 |
| 3.2.1 AFN/Medical Baseline Engagement and Outreach..... | 17 |
| 4 Event Coordination..... | 19 |
| 4.1 Notifications..... | 19 |
| 4.1.1 PSPS Notification Process..... | 20 |
| 4.1.2 Public Information Resources and Alerts..... | 20 |
| 4.1.3 Notification Templates..... | 21 |
| 4.1.4 In-Language Notifications | 21 |
| 4.1.5 Alignment of Notifications to the Standardized Emergency Management System (SEMS) Framework and Common Alerting Protocol (CAP) | 22 |
| 4.1.6 Notification System Test | 23 |
| 4.2 Event Coordination with Local Agencies..... | 23 |
| 4.2.1 Requests to Embed Representatives in Emergency Operations Centers | 23 |
| 4.2.2 Additional Coordination Opportunities | 24 |
| 4.2.3 Secure Information Sharing Portal..... | 24 |
| 5 Post De-Energization | 25 |
| 5.1 Post De-Energization Reporting Requirements | 25 |

List of Tables

| | |
|--|---|
| Table 1. 2019 PG&E-Specific Statewide Public Education and Outreach Campaign Summary and Results | 6 |
| Table 2. PG&E Emergency Preparedness and PSPS Customer Outreach 2019 Achievements and 2020 Plans Comparison..... | 9 |

List of Figures

| | |
|---|----|
| Figure 1. Image of PG&E CWSP Open House in 2019 | 10 |
| Figure 2. Sample of PG&E News Release (e.g. earned media) | 10 |
| Figure 4. Sample PG&E Website Banner That Encourages Updates to Contact Information | 10 |
| Figure 3. Sample PG&E Social Media Post Related to Wildfire Safety Program..... | 11 |
| Figure 5. Sample PG&E Emergency Preparedness Advertisements | 11 |
| Figure 6. Sample PG&E Direct Mail Collateral | 12 |

1 Executive Summary

California faces an increasing threat from catastrophic wildfires, severe weather and higher temperatures, and recent state and federal climate assessments warn the threat is only growing. In 2012, just 15 percent of Pacific Gas and Electric Company's (PG&E's) service area was designated by the California Public Utilities Commission (CPUC) as having an elevated wildfire risk. Today, it is more than 50 percent¹.

Multiple factors contribute to wildfire risk and an extended fire season across PG&E's service area. Prolonged periods of high temperatures, extreme dryness, tinder-dry grass and record-high winds combined with vast tree mortality following a historic five-year drought are increasing the number of wildfires and making them more dangerous.

Extreme hazard weather conditions were particularly severe during the 2019 fire season, resulting in multiple Public Safety power Shutoff (PSPS) events throughout PG&E's service territory. The largest PSPS event occurred on October 26 through November 1, affecting approximately 968,000 customers in 38 counties. During that period, peak wind gusts in the fire risk areas reached speeds as high as 102 miles per hour, which is strong enough to blow tree limbs into power lines from a considerable distance.

PG&E acknowledges there is room for further improvement in its implementation of PSPS. PG&E is committed to learning from each PSPS event and advancing practices for events in the future. Although grid de-energization is effective at reducing ignitions and utility-caused wildfires in high fire risk areas, PSPS events are highly disruptive for PG&E's customers and communities. Over the course of the 2019 PSPS events, PG&E learned many lessons about how to conduct them more effectively, and how to better help its customers prepare for and manage through PSPS events. Looking forward, PG&E is focused on making future PSPS events smaller, shorter, and less impactful to our customers.

PG&E has completed or is implementing these important safety enhancements and investments to help keep its customers and communities safe.

- Installed hundreds more weather stations: PG&E installed 426 weather stations in 2019, 26 more than the goal of 400, and adding to the 200 weather stations installed in 2018.
- Installed more high-definition cameras; an effective tool for early spotting of wildfires and monitoring real-time conditions, 133 high-definition cameras were installed in 2019, 37 more than the goal for the year.
- Utilized temporary microgrids: In 2019, PG&E safely readied and operated four temporary microgrids to energize more than 4,800 customers during the October and November PSPS events in portions of Angwin, Calistoga, Grass Valley and Placerville.

PG&E's 2020 plan includes changes to make PSPS events smaller in scope and shorter in duration and to lessen the overall impacts of shutoffs while working to keep customers and communities safe during times of severe weather and high wildfire risk.

¹ 2020 Wildfire Mitigation Plan Highlights Press Release; PG&E Currents Publication Feb. 7, 2020

More information about the actions described herein, as well as about other, related actions, can be found in PG&E's 2020 Wildfire Mitigation Plan (WMP) and in the Biweekly Report of Pacific Gas and Electric Company (U 39 E) in Compliance with January 30, 2020 Assigned Commissioner's Ruling (filed Feb. 10, 2020 and biweekly thereafter).

2 Operational Updates

2.1 Thresholds for Strong Wind Events

As noted in PG&E's 2019 PSPS Progress Report, PG&E views the risk for a catastrophic fire caused by PG&E equipment as the probability of an outage leading to an ignition combined with the consequence or growth potential of a resulting fire. As explained in the 2019 Progress Report, there are two key inputs of PG&E's analysis to determine PSPS criteria:

- PG&E's Outage Producing Winds (OPW) model; and
- PG&E's Utility Fire Potential Index (Utility FPI).

PG&E's meteorology department integrates weather data from numerous internal and external sources, including hundreds of PG&E's own weather stations located in the High Fire Threat District (HFTD) areas. Several times each day, PG&E meteorologists use these data streams to forecast wind and weather patterns that are utilized to calculate fire risk levels across the service territory. These forecasts support PG&E operations and guide the need for wildfire preparation and mitigation activities, including possible PSPS. In addition, PG&E is developing fire spread modeling tools to understand potential wildfire risks and wildfire consequence.

In late 2018 and 2019, PG&E's meteorology team compiled one of the largest known high-resolution climatological datasets in the utility industry: a 30-year, hourly, 3 kilometer (km) spatial resolution dataset consisting of weather, dead and live fuel moistures and fire weather assessments, to improve identification of historical high-risk weather patterns. The same model used to construct this climatology is used in forecast mode for apples-to-apples comparison of weather fire risk. PG&E used this climatology, outage activity recorded over a decade and the USFS fire occurrence dataset to train and operationally deploy the FPI and OPW models. In 2019, PG&E's weather forecasting and fire risk analysis was built on weather models at a 3 km by 3 km resolution to forecast conditions within each 9 square km section of PG&E's entire HFTD area. In 2020, PG&E is working with industry leading numerical weather prediction experts to refine these models at an even tighter resolution, in 2 km by 2 km, 4 square km sections, with the capability of 0.67 km forecasts in defined areas on-demand.

In addition, PG&E will also deploy an 8-member ensemble (8 different forecasts) at 2 km by 2 km to help determine the range, spread and uncertainty of an upcoming scenario. Once operational, this will be the largest known ensemble prediction system in the utility industry. This improved modeling and geographical precision will allow better determination of specific areas and lines at high outage and fire risk, as well as determination of which lines are at less risk for potential exclusion from consideration in a given potential PSPS event. PG&E is also evaluating incorporation of outputs from a Technosylva fire spread model to improve PSPS decision making. The Technosylva model will be informed by PG&E's new 2 by 2 km forecast model for more granular weather inputs. In addition, the Technosylva model will

be enhanced to run twice a day, instead of once a day. This will increase the number of fires simulated daily from near 75M to 150M. In 2020, PG&E will work to further consolidate and integrate its situational awareness tools, data and analytical capabilities for deeper insights and actionable analyses.

2.2 De-Energization of Distribution Lines

The process for determining de-energization of distribution lines is described in summary below.

PG&E considers many different inputs when determining whether a distribution line should be de-energized. The scope of distribution circuits with the potential for de-energization is based on the forecasted weather event. PG&E evaluates which distribution lines (if any) pass through the forecasted weather event's footprint, as determined by PG&E's meteorology team.

Whole or portions of distribution circuits outside of the weather footprint may be de-energized due to two main drivers. First, the closest source side device used to segment the line may be located outside of the weather footprint. Second, distribution lines may be de-energized as a downstream impact of de-energizing Transmission lines. Actions PG&E is taking to minimize both of these impacts are described in PG&E's 2020 Wildfire Mitigation Plan.

In confluence with hardening activities outlined in PG&E's 2020 WMP, PG&E plans to assess and develop decision making criteria for the potential exclusion of hardened "safe-to-operate" distribution facilities from a given PSPS de-energization event during the forecasted high fire threat weather conditions. Similar to PG&E's current risk-based transmission line assessment used during the event scoping process, distribution line criteria would be based on the wildfire risk reduction associated with the hardened assets, and the forecasted weather. Additional information can be found in Section 5.3.3.8 of PG&E's 2020 WMP.

2.3 De-Energization of Transmission Lines

At this time, PG&E's decision-making process for the scope of de-energized transmission lines has not changed since the last progress report filed in September 2019. PG&E is continually assessing its decision-making protocol, which may result in changes in 2020 or beyond. Additional information on decision making protocols and transmission de-energization mitigation efforts can be found in PG&E's 2020 Wildfire Mitigation Plan. The process for determining de-energization of transmission lines is described in summary below.

PG&E's PSPS Program has established criteria for when overhead electric transmission line facilities can be excluded from being de-energized in PSPS events. These criteria include assessing the following for transmission line facilities within high-risk areas projected to experience a PSPS event: (1) health of all assets on the transmission line facility; (2) weather conditions including wind speed for the specific event, (3) fire spread potential, (4) existence of outstanding critical repairs, (5) vegetation risks. By applying these criteria, PG&E will be able to consider whether to exclude certain transmission lines from de-energization during a given PSPS event, when safe to do so, which would reduce the risk of service interruptions to customers served by those transmission lines during PSPS events.

Prior to next fire season, PG&E will be evaluating transmission lines within the high-fire threat districts where repairs, utilization of sectionalizing devices, or vegetation management may add value to reduce the number of customers affected during a PSPS event based on 2019 historical events. In addition, PG&E is assessing all lines currently in Tier 2 and 3 areas for potential asset replacements where an improvement in asset health could lower the expected wildfire risk due to wind conditions. Assessments of all lines are planned to be completed in 2021. Replacement projects identified from this assessment may take additional years to fully complete, after which the ability to exclude the lines from a given PSPS event, based on the weather conditions of the event, could be considered. This may be on the range of 7-10 years. Additional information regarding efforts to mitigate transmission-level impacts during PSPS events can be found in PG&E's 2020 Wildfire Mitigation Plan.

Regarding requirements related to transmission line de-energization coordination and notification, PG&E will continue to notify impacted transmission customers or interconnected transmission entities (e.g., municipal utilities) up to three times before de-energization², as well as during the restoration of power. However, the timing of the transmission-level notifications is dependent on weather forecast timing, in addition to timing associated with the multi-step evaluation process to identify the ultimate scope for transmission line de-energization. More detail is provided on the notifications process in Section 4.1, including the notifications to transmission customers or interconnected transmission entities.

Prior to notifying transmission customers during a given PSPS event, PG&E engages with Public Safety Partners as required by the CPUC. In order to ensure compliance with FERC Standards of Conduct, concurrently with PG&E communicating the initial transmission PSPS scope to Public Safety Partners who may also be electric wholesale market participants, PG&E posts notice regarding these communications, including specifying the transmission PSPS scope, to PG&E's FERC Standards of Conduct website: www.pge.com/en_US/about-pge/company-information/regulation/ferc-standards-of-conduct/ferc-standards-of-conduct.page.

2.4 Reducing the Impacts of PSPS

PG&E is working to make PSPS de-energization events smaller, shorter and less burdensome on affected communities. In 2019, PG&E conducted multiple PSPS events that affected hundreds of thousands of customers. While the PSPS events successfully mitigated the risk of ignition of a catastrophic fire and no fatal wildfires occurred in 2019, the events caused severe disruption to the communities and customers we serve. Based on the execution of 2019 PSPS events, PG&E is working to reduce size and duration of future PSPS events and to improve the execution of PSPS events for customers, communities, and agency partners while working to keep customers and communities safe during times of severe weather and high wildfire risk.

Comprehensive information on the measures PG&E is taking to reduce the impact of PSPS can be found in PG&E's 2020 Wildfire Mitigation plan.

² Weather event and forecasting permitting

3 Outreach

3.1 Coordination with Public Safety Partners, Communities and Customers

PG&E considers the safety of its customers and communities to be its greatest responsibility. With the changing climate's impact to the state, PSPS is an important component of PG&E's comprehensive efforts to reduce the risk of wildfires throughout its service area. Given that, PG&E is committed to improving its communications and coordination with outside agencies, communities and individual customers.

Prior to the 2019 peak wildfire season, PG&E designed and executed a comprehensive PPS community outreach strategy, serving to increase awareness of PPS and readiness for extended power outages. PG&E also worked with first responders and local communities in advance to enhance customer notifications and ensure a coordinated response when PPS events are forecasted and/or called. In 2019, these efforts included, among other things, a statewide PPS awareness and preparedness campaign in coordination with other California utilities; over 1,080 meetings with cities, counties, agencies, tribes, first responders, community groups, and other stakeholders; 17 workshops with more than 930 local emergency services agencies; webinars with telecommunications providers, water agencies, and schools; individual meetings with large customers, including those providing critical services (including refineries, BART, Cal Trans, the California Hospital Association and its members); and 23 community open houses with approximately 3,200 attendees and three customer-specific webinars.

To help improve coordination and overall PPS preparedness, PG&E is conducting and will continue to conduct extensive communications with customers and communities including letters, emails, meetings, in-person events, listening session meetings with county and tribal officials, outreach to Public Safety Partners and large / critical customers, radio, digital, television and print advertising, as well as social media and earned media outreach. PG&E has continued to refine these efforts to ensure that its messages are understandable, help drive action and preparedness for both planned and unplanned outages and reach the communities who need them most. In addition to these efforts, California's large electric IOUs (PG&E, Southern California Edison and San Diego Gas & Electric Company, collectively the "joint IOUs") are working together on confirming the need for continued statewide outreach for PPS education and awareness.

PG&E's 2020 outreach initiative will build on the outreach strategy implemented in 2019. These plans account for the feedback received from Public Safety Partners, communities and customers as described in sections 3.1.4 and 3.1.3.

Additional details about the outreach efforts implemented and planned are included below.

3.1.1 Statewide Public Education and Outreach Campaign

Under the direction and review of the Cal OES, the CAL FIRE and the CPUC, the statewide *Power of Being Prepared* campaign launched on May 6, 2019. The campaign used a variety of media to increase public awareness about emergency preparedness, including PPS. These media types included radio, digital display banners, digital video, social media and search engine advertising. Information was developed in a variety of languages including: English, Spanish, Chinese (Written: Traditional; Audio: Cantonese and Mandarin), Tagalog, Vietnamese, and Korean. Campaign materials, including information regarding how

to prepare for emergencies are provided at the website www.prepareforpowerdown.com, which is also compliant with the Americans with Disability Act (ADA).

The following summarizes the types of outreach involved in the 2019 statewide public education and outreach campaign, as well as the associated time period and outcomes specific to PG&E territory (unless otherwise noted).

Table 1. 2019 PG&E-Specific Statewide Public Education and Outreach Campaign Summary and Results

| Pacific Gas and Electric Company Territory Outreach Summary | | |
|--|------------------------------|---|
| Type of Outreach | Time Period | Results |
| Advertisements & related outreach | May 6, 2019 - Nov. 29, 2019 | 920,000 users, 1 million-page views (statewide), 180 million impressions ³ |
| Radio campaigns | May 6, 2019 - July 14, 2019 | 78,730 spots, 93 million impressions <ul style="list-style-type: none"> • English: 76,189 spots, 89 million impressions • Spanish: 2,173 spots, 3 million impressions • Chinese: 368 spots, 287k impressions |
| Digital Campaign | May 27, 2019 - Nov. 29, 2019 | 87 million impressions, 0.18% click-through rate |
| Video completions⁴ | June 19, 2019 – Nov. 3, 2019 | 19.5 million |

PG&E played an active role in the campaign, coordinating activities with the joint-IOWs, contributing content, standardizing messaging and promoting the campaign. PG&E continues to utilize campaign materials in its ongoing outreach and engagement efforts with communities, customers and organizations that serve Access and Functional Needs (AFN)⁵ populations.

In March 2020, Cal OES will review the 2019 campaign results and identify 2020 priorities. The IOWs have begun to strategize the marketing and advertising approaches for the 2020 fire season. This includes researching the efficacy of continuing to invest in a statewide campaign, in addition to each IOW’s local advertising campaigns that are closely coordinated with their individual customer outreach programs around PSPS and preparedness.

3.1.2 Direct Customer Outreach

The following describes PG&E engagement with customers to collect feedback about opportunities to improve PG&E’s implementation of the PSPS protocols, as well as the outreach efforts completed in 2019 and planned in 2020.

³ Impressions track the number of people receiving marketing information.

⁴ Video completions indicate that viewers watched the entire video and were exposed to the full message. Click through rates are tracked separately.

⁵ As defined in PSPS D.19-05-042, Access and Functional Needs (AFN) populations consists of “individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency or who are non-English speaking, older adults, children, people living in institutionalized settings, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant.”

3.1.2.1 PG&E's Solicitation of Customer Feedback

Since last reporting PSPS progress in September 2019, PG&E has undertaken extensive efforts to quantitatively and qualitatively understand and evaluate customers' awareness and feedback related to the effectiveness of PG&E's outreach, support and implementation of wildfire preparedness activities and PSPS execution. Below summarizes the customer feedback and outcomes from these surveys, studies, meetings and interviews.

Wildfire Preparedness and PSPS Awareness Studies

In May and August 2019, PG&E surveyed over 2,000 customers to understand their awareness and recall of wildfire safety-related communications. PG&E PSPS awareness increased from 60% in May 2019 to 76% in August 2019 and is expected to have increased significantly following the multiple and widespread PSPS events that occurred in the Fall of 2019. Many customers recalled wildfire safety communications, were aware of PSPS, and had taken some action to prepare for wildfire season. In early 2020, PG&E will be conducting a third awareness survey and will have results by the end of March 2020.

Medical Baseline Customer and Health Practitioner Interviews and Surveys

In October 2019, PG&E interviewed current and former medical baseline customers to identify recommendations for increasing awareness of the Medical Baseline Program and to improve PSPS communications and outreach to Medical Baseline customers. These interviews were used to inform the broader survey conducted in December and January, described below, that took place with existing and prospective medical baseline customers.

In October and November 2019, PG&E conducted online surveys and interviews with Health Care Practitioners (HCPs), including physicians, nurses, a surgical technologist, a rehab counselor, and a contract specialist to assess how best to make medical professionals and qualified medical baseline certifying individuals aware of the program, understand the motivations for participating in the program, and gain feedback on the enrollment and notification processes.

In December 2019 and January 2020, PG&E conducted surveys with current and prospective medical baseline customers to measure their PSPS experience, identify how customers learned about the shutoff, how frequently they were notified, how they prepared, and how they would prefer PG&E to communicate during PSPS events.

The outcomes of these medical baseline customer-focused surveys and interviews have helped to shape PG&E's medical baseline program acquisition campaign planned in 2020 and identify future Medical Baseline Program improvement opportunities.

Evaluation of Feedback from Digital Channels

In December 2019, PG&E aggregated customer input collected through digital channels, including online surveys that were submitted by customers when visiting pge.com, social media content shared by customers, as well as conducting an analysis of web traffic and key pages and content that customers visited. PG&E identified opportunities related to improved content of the customer notifications, as well as web content and navigation.

PSPS Co-creation Sessions with Customers, Partners & PG&E Employees

In January 2020, PG&E gathered customers, cross-functional employees and partners from CAL FIRE and Alameda County in its first customer co-creation workshop. The results of this workshop will be used to inform communications, operations and customer experience decisions for implementation before the next wildfire season.

PSPS Experience Survey

In January 2020, PG&E conducted an online PSPS experience survey with customers to get feedback on PSPS events, including how customers became aware of an event, how they prepared, and if they visited a Community Resource Center (CRC). PG&E evaluated these responses to inform future program enhancements.

Engagement with Critical Facilities

In addition to the listening sessions with counties and tribes, PG&E is also meeting one on one and in group listening session formats with key critical facilities to gather their feedback on the 2019 PSPS events and recommendations on how PG&E can improve its communications and operations for its customers and communities. This includes supporting EPA-led water agency workshops, conducting a PG&E-led workshop with telecommunication providers, in addition to meeting directly with telecommunication providers, BART, Cal Trans, Department of Energy National Labs, University of California Berkeley, California Large Energy Consumers Association (CLECA), refineries, and rail companies.

Event Notification Message Testing

PG&E is currently and will continue to conduct notification message testing to test language used in notifications sent to customers during PSPS events. PG&E will leverage the feedback from this message testing to update script verbiage, as needed, for the 2020 fire season.

The outcomes of all research described above has or will be used to identify data-driven improvement opportunities for a variety of aspects in the PSPS program. Example aspects of the improvement opportunities include but are not limited to: PG&E website (e.g. content and navigation), communications approaches (e.g. notification process and verbiage), and programs and services offerings (e.g. Medical Baseline Program improvements and AFN support services offered).

3.1.2.2 PG&E Direct Outreach to Customers

PG&E's 2019 outreach and engagement campaign included an extensive, multi-channel approach to drive awareness and preparedness for emergencies and a potential PSPS event. This outreach included hosting community events, having both earned and paid media, conducting direct to customer mail and email campaigns, engaging actively in social media and through its website, and directly engaging with our customers through in-person meetings, phone calls and emails. This outreach included requests for updated contact information and/or provided general education and awareness information to help customers and communities prepare for emergencies and a potential planned outage.

Direct-to-customer outreach that took place during PSPS events focused on PSPS event communications and is described in each of PG&E’s de-energization reports in compliance with ESRB-8.

The section below provides a comparison of the customer and community engagement efforts related to both emergency preparedness and PSPS planning completed in 2019⁶ and planned in 2020 (as of February 2020). The focus of 2020 outreach will account for the array of feedback that PG&E has gathered from customer research, post-PSPS event after-action reviews, and listening sessions with stakeholders as described in section 3.1.2.1 to inform PG&E’s approaches for engaging with customers and local communities.

Table 2. PG&E Emergency Preparedness and PSPS Customer Outreach 2019 Achievements and 2020 Plans Comparison

| Customer Engagement | | 2019 Outreach Completed | 2020 Planned Outreach |
|---------------------|---|---|---|
| Community Events | Open Houses | 23 | 40+ |
| | Customer Webinars | 3 | 12 |
| Earned Media | News Releases | 124 | TBD |
| Advertising | Advertising Impressions TV, Digital, Social, Radio, Print | ~84 million Avg. impressions / month | TBD |
| Direct To Customer | Direct Mail Campaigns Letters, Postcards, Brochures, Bill Inserts/Packaging | 17 | 19+ ⁷ |
| | Customer Email Campaigns | 25 | 75+ |
| Digital Media | Social Media Posts | 21 Facebook Posts 187 Tweets ⁸ | TBD ⁹ |
| | PG&E Website Alert Banner | 8 million impressions | TBD |
| | PG&E Website Pop up to Update Contact Information | 2 million impressions | TBD |
| Direct Engagement | Meetings with business customers | All assigned business customers and critical facilities in Tier 2 & 3 HFTDs | All assigned business customers in Tier 2 & 3 HFTDs and all critical facilities |

⁶ Note the 2019 outreach excludes PSPS-event specific communications and engagement

⁷ Potential to expand reach of mailing list

⁸ 2019 numbers do not include PSPS event-related posts, which are described in PG&E PSPS event reports

⁹ 2020 to include posts to social media site Nextdoor

Community Events

In 2019, PG&E held 23 open houses across the territory and three customer-specific webinars to supplement the open houses for customers and the public that were not able to attend an open house. Over 3,200 people attended these events.

Between April 2020 and August 2020, PG&E plans to host over 40 open houses throughout its territory. The focus of these open houses will be to provide an update on the identified areas of improvement based on lessons learned identified by PG&E, as well as customers, local governments and tribal agencies, and community organizations. At the upcoming open houses, PG&E is preparing to have American Sign Language (ASL) translators, as well as in-language translation support, where demand is determined. For customers that cannot attend an in-person open house, 12 webinars will also be conducted to supplement the open houses. PG&E will publicize these events via email, on its website and through collaborations with local organizations.



Figure 1. Image of PG&E CWSP Open House in 2019

Earned Media

In 2019, PG&E issued 125 news releases focused on ensuring customers and communities are prepared for an emergency, including both planned and unplanned outages, as well as providing progress update related to PG&E's wildfire prevention efforts.

In 2020, the focus of the earned media approach will include PSPS call to action (e.g. update contact information) in all community wildfire safety program earned media, with focused messaging around improved technology and increased resources, including overall Wildfire Mitigation Plan elements, Medical Baseline Program awareness and enrollment, leveraging AFN partnerships and resources as appropriate, and conducting direct outreach to local media outlets before, during and after PSPS events to cascade information to communities.

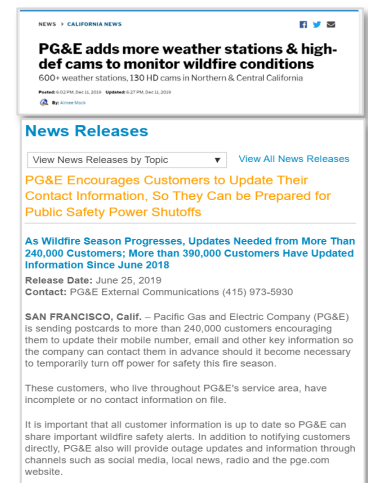


Figure 2. Sample of PG&E News Release (e.g. earned media)

Social / Digital Media

In 2019, PG&E issued over 200 social media posts on Facebook and Twitter (not including PSPS event-related updates) that provided customers with emergency preparedness information and recommended actions to take that are relevant for both planned and unplanned outages. In addition, PG&E utilized existing inbound traffic to pge.com to further increase awareness of PSPS by placing an alert banner emphasizing the importance of PSPS preparation on almost every page of pge.com in the months leading up to peak PSPS season. PG&E also created a pop up that was shown to every customer that logged into their account, allowing them to update their contact information. These warning banners were shown more than 8 million times leading up to the October 2019 PSPS events.

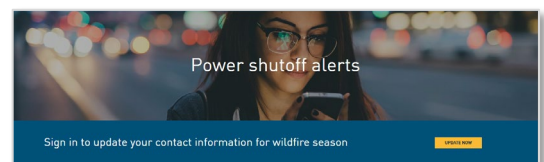


Figure 3. Sample PG&E Website Banner That Encourages Updates to Contact Information

In 2020, PG&E’s social media posts will focus on providing shareable videos, tips and alerts on PSPS and other safety actions and milestones on Twitter, Facebook, Nextdoor. In addition, PG&E will use geotargeted posts to publicize local events provide photos, videos, tips and checklists for PSPS preparedness, provide updates on wildfire safety maintenance and safety work, and mirror direct mail/email communications.

Additionally, PG&E is focused on ensuring the website is streamlined, stable and refreshed with more visually engaging emergency preparedness and PSPS content. This includes updating website layout for improved customer navigation, posting short, customer-friendly videos on frequently discussed topics, providing informational resources listed on the website such as webinar and open house content, providing informational events promoted through continuous and timely updates to an event calendar, directing customers to update their contact information, posting informational updates to Safety Action Center on emergency preparedness and PSPS safety and continuing to update joint IOU website prepareforpowerdown.com.

Additionally, PG&E is focused on ensuring the website is streamlined, stable and refreshed with more visually engaging emergency preparedness and PSPS content. This includes updating PG&E’s website layout for improved customer navigation, posting short, customer-friendly videos on frequently discussed topics, providing informational resources listed on the website such as webinar and open house content, providing information on events promoted through continuous and timely updates to an event calendar, directing customers to update their contact information, posting informational updates to the Safety Action Center on emergency preparedness and PSPS safety, and continuing to update joint IOU website prepareforpowerdown.com.



Figure 4. Sample PG&E Social Media Post Related to Wildfire Safety Program

Advertising

In 2019, PG&E conducted extensive advertising via TV, website, social media, radio and print. This resulted in an average of 84 million media impressions per month.

PG&E takes a multifaceted approach to ensure its messaging resonates with customers and emphasizes emergency preparedness (e.g., what to pack in an emergency kit, how to make an emergency plan). The advertisements target print, cable and broadcast TV, radio and digital ads directing customers to the Safety Action Center. The Safety



Figure 5. Sample PG&E Emergency Preparedness Advertisements

Action Center promotes videos, quizzes and tips on how to prepare for wildfires, earthquakes, PSPS events and other natural disasters.

Direct Mail and Email

In 2019, PG&E issued 25 emails and 17 different direct mail piece types, including letters, postcards, brochures and bill inserts that were focused on emergency preparedness and providing information on PSPS -- over 32 million direct mail pieces were sent.

In 2020, PG&E's focus is to provide residential and commercial customer outreach focused on wildfire safety education and emergency preparedness, as well as highlighting system improvements made to reduce wildfire risk. PG&E will provide customers with resources and various options to help them prepare to their needs, including solutions for backup power and financing, and reference to community partners that may help serve their needs. PG&E will send monthly emails to electric customers to provide additional emergency preparedness messaging and request they keep their contact information update to date. PG&E will also issue invitations to customers to attend local open houses and webinars.

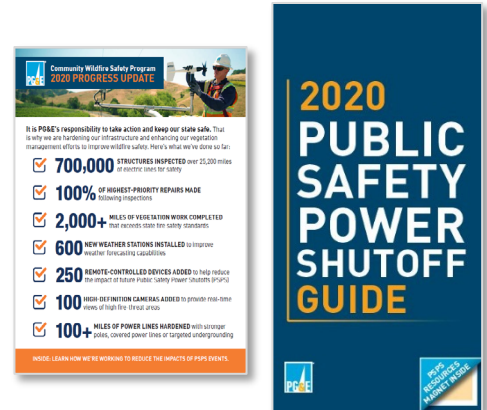


Figure 6. Sample PG&E Direct Mail Collateral

PG&E will provide additional outreach to those customers in high fire-threat areas, as well as existing and potentially eligible medical baseline customers. Specialized educational outreach will also be provided to key stakeholders, including: tenants of master metered customers that are not a direct customer of PG&E, AFN customers to provide information regarding additional support available during PSPS events, and assigned customers and critical facilities to ensure preparedness. Additionally, PG&E seeks to increase outreach and resources for AFN customers, as well as the diversity of outreach channels made available (e.g. coordinating with Community Based Organizations (CBOs) as an additional channel for outreach).

Direct Business Customer Engagement

In 2019, PG&E met with all assigned large commercial and industrial customers, including critical facilities served by lines that run through Tier 2 and Tier 3 HFTDs to share PSPS-related and emergency preparedness information and update their PSPS contact information. In 2020, PG&E will continue its to prioritize direct engagement with all assigned large commercial and industrial customers in the territory in Tier 3 and Tier 3 HFTDs and will provide outreach to all critical facilities (regardless of their location). This outreach is more fully described in section 3.1.4.2

3.1.3 Outreach to Public Safety Partners

In 2019, PG&E conducted more than 1,100 meetings with local civic and community leaders, first responders, and other public safety authorities to discuss PSPS and preparedness efforts.

From June to November 2019, PG&E initiated multiple PSPS events that impacted customers across 38 counties. The feedback received from tribal and local governments, as well as other Public Safety Partners, during the events made it clear that more must be done to improve information sharing, external coordination and overall PSPS preparedness. PG&E is working to make future events smaller,

shorter and smarter to keep customers and communities safe during times of severe weather and high wildfire risk.

Listening Sessions

To ensure we are working towards a 2020 PSPS plan that includes solutions that meet the needs of local and tribal governments, starting in December 2019, members of PG&E's Leadership Team began meeting with counties and tribes impacted by the October and November 2019 PSPS events. These sessions provided an opportunity for local jurisdictions or tribes to provide critical feedback regarding their experiences during these events. We will be using this feedback to shape changes to the PSPS program in 2020. To date, we have completed 36 listening sessions with counties, cities and tribal governments. eleven counties have declined PG&E's offer to meet.

Localized Discussions

Based on feedback received from counties and tribes and commitments made during the listening sessions, PG&E plans to conduct additional localized outreach to all counties and tribes within Tier 2 or Tier 3 High Fire-Threat District areas or those that were impacted by a 2019 PSPS event. During these meetings, PSPS planning information will be provided to agencies to assist with PSPS preparedness and will discuss PSPS processes such as notifications to customers and communities. We anticipate beginning this outreach in March and take place through June.

As part of this outreach, PG&E will again confirm that the 24-hour primary and secondary points of contact the company has on file for all cities, counties and tribes located within the PG&E service territory is up to date. In many instances, a tertiary point of contact has been identified and will be updated, as needed. PG&E has also identified points of contact at the CPUC and Cal OES to be used during PSPS events. This up-to-date contact information will be leveraged for PSPS outreach and event notifications to Public Safety Partners. During an event, state agencies, cities, counties and tribes are encouraged to email PG&E's 24-hour email, as well as, contact their dedicated Liaison representative that will act as a single point of contact to resolve local issues and provide real-time information. Other Public Safety Partners, such as telecom providers and water agencies can receive event information through the Critical Infrastructure Lead in the EOC, via their account representative, or via the Customer Strategy Officer in the local Operations Emergency Center (OEC).

Outreach will also be conducted with Community Choice Aggregators, municipal utilities, water agencies and telecommunication providers to discuss PSPS preparedness and confirm the contact the company has on file is up to date.

Additional Outreach

PG&E has existing emergency response plans in place for emergencies such as non-utility caused wildfires using the incident-within-incident ICS framework that would be applicable during a PSPS event. PGE will coordinate with Public Safety partners during a PSPS event, when loss of power inhibits the response to an emergency event such as a wildfire. This coordination would occur on a case by case basis, in order to determine the most effective resolution.

In addition to the outreach listed above, PG&E will continue to conduct ongoing direct outreach to Public Safety Partners and first/emergency responders through in-person meetings, emails, and phone

calls to provide an overview of its PSPS program in 2020, including outlining any new resources available to them.

3.1.3.1 Coordination with Government Agencies and Tribes on Community Resource Center Site Identification

In an effort to minimize public safety impacts as a result of the loss of power upon implementing PSPS protocols, PG&E mobilizes (opens) Community Resource Centers (CRCs) in impacted counties and tribal communities to provide customers and residents a space that is safe, energized and air-conditioned or heated (as applicable), primarily during daylight hours (typically from 8:00am to 8:00pm). More detail about the CRC features can be found in PG&E's Wildfire Mitigation Plan.¹⁰

During the 2019 PSPS events, PG&E adjusted their CRC siting strategy when the EOC was active to ensure tribes, counties, and local Offices of Emergency Services with the affected customer population provided input and approval on the CRC site locations. PG&E either asked for approval to set up the CRC in the location last utilized, or if the county or tribe preferred to move the CRC to a different location, or not have one mobilized at all. If the county requested the CRC location to be moved, PG&E worked with the property owners to execute a new agreement during the event.

As of February 2020, PG&E has approximately 100 CRC locations across over 30 counties with agreements executed with land owners. These sites are a mix of both indoor and outdoor locations that may be leveraged as a CRC location during a future PSPS event. Prior to the 2020 wildfire season, however, PG&E is targeting to have approximately 200 indoor CRC locations identified with input from local governments and agreements executed that may be used during a PSPS event.

PG&E is currently exploring semi-permanent, indoor CRCs with on-site backup power, while working with property owners to secure agreements. For each potential CRC location, PG&E will conduct Americans with Disability Act (ADA) assessments and ensure for backup power connectivity.

PG&E will continue to account for feedback from customers and local agencies that may influence the support and resources provided by PG&E for CRCs.

3.1.4 Identification and Outreach to Critical Facilities and Critical Infrastructure

3.1.4.1 Critical Facility Site Identification

PG&E identifies customers of record that meet the CPUC's definition of critical facility and critical infrastructure and continues to ensure the maintenance of these designations. In January 2020, PG&E automated their approach for identifying their list of critical facilities, which uses Structured Query Language (SQL) to pull key fields related to the customer account and assign as critical accordingly. This automation allows the searches to be thorough, documentable, editable, and repeatable. The automated review is then supplemented and verified by local experts and account managers to confirm that sites are accurately characterized as critical. Subsequently, these reviewed and verified lists will be validated with Public Safety Partners in advance of wildfire season.

¹⁰ Pp. 5-289 – 5-291

The critical facility identifier is used for prioritizing notifications with these entities to receive PSPS notifications in advance of general customers, as well as prioritized restoration once the weather event has cleared. It is also used for prioritizing outreach to obtain up to date 24-hour contact information to be used during a PSPS event.

3.1.4.2 Critical Facility Outreach and Engagement

*In July 2019, PG&E initiated an outreach campaign to local governments and tribes to confirm and verify critical facilities and infrastructure within their jurisdiction. In the Spring of 2020, PG&E intends to follow-up with local governments and tribes to share the outcomes of the updates made to PG&E's critical facilities lists based on the approach described above and gain additional input. Upon request, PG&E will share their list of critical facilities with local agencies and in alignment with data sharing practices.*¹¹

Since 2018, on an annual basis, PG&E has provided direct outreach to all large, assigned commercial and industrial customers, including critical facilities, served by lines that run through Tier 2 and Tier 3 HFTDs, to update their PSPS contact information. Starting in April 2020, PG&E plans to conduct direct outreach with all assigned, large commercial customers in Tier 2 and Tier 3 HFTDs areas, as well as all critical facilities (regardless of location). The outreach is focused on enabling customers to be prepared for emergencies and a PSPS-related outage, including confirming correct contact information and providing backup power information, which will be conducted through direct contacts, webinars, open houses, workshops, and working groups, as relevant.

Through on-going engagement, PG&E plans to continue to coordinate with critical facilities, such as fuel suppliers and refineries, telecommunications providers, transportation, among others, to help these customers further understand and more effectively plan for the impacts of a PSPS event on the ability to safely operate these facilities.

Additionally, PG&E is currently exploring options to create a working group and cooperative framework to enhance information sharing and preparedness before the next wildfire season, establish realistic service expectations and planning needs, better coordinate during emergency and disaster events, and promote overall resiliency with Telecommunication providers in support of our mutual communities served.

3.1.5 Backup Power Support

PG&E is committed to working with customers to help them prepare for possible outages, including supporting assessment of prolonged outage plans and backup generation options. Over the past six months, PG&E's focus was on the implementation of 2019 PSPS events, as well as collecting lessons learned from those events to make improvements in 2020.

¹¹ PG&E is actively assessing the handling of critical facility information that is considered commercially-sensitive, trade-secret, or security sensitive by customers who operate those facilities. In light of these confidentiality considerations, PG&E is implementing a corrective action in its comments on PSPS guidelines that requests Commission clarification of the requirements for sharing sensitive critical facility customer information with and without an enforceable non-disclosure agreement before, during and after PSPS events.

The following describes PG&E's activities completed in 2019:

- Provided backup power education and resources on the PG&E backup generation website (www.pge.com/backupgeneration), including financial incentives, financing options and portable backup power product options for residential and large business customers;
- Engaged directly with backup generator vendors to understand demand and encourage financing options for customers;
- Initiated a contract with the California Foundation for Independent Living (CFILC), which assists AFN customers obtain portable backup power solutions. During the 2019 PSPS events, almost 200 portable backup solutions were delivered to medically sensitive customers to assist customers that require continuous power for medical sustainability. Both PG&E and CFILC communicated the availability of these resources during the events;
- Achieved modification to the existing Self Generation Incentive Plan (SGIP) to include a wildfire resiliency component (called "equity resiliency"). This enables PG&E to provide a generous incentive that offsets almost 100% of battery and installation costs, targeting Critical Facilities and Infrastructure (as defined in the SGIP proceeding D. 19-09-027), as well as Medical Baseline customers, in Tier 2 and Tier 3 HFTDs or who have experienced two or more discrete PSPS events;
- During 2019 PSPS events, PG&E deployed temporary generation to re-energize:
 - PG&E's pilot temporary microgrid (i.e., Resilience Zone) designed to support community resilience by powering a cluster of shared resources (i.e., a commercial corridor, student housing, and a fire station) so that those resources could continue serving surrounding residents during PSPS events;¹²
 - Safe-to-energize substations that were impacted by PSPS events due to transmission level outages, thereby providing power to thousands of customers, including shared resources and residential customers; and
 - Certain critical facilities during circumstances in which a customer's lack of a functioning generator posed a risk to societal continuity¹³. At peak deployment during the October 26 PSPS event, PG&E mobilized 41 MW of temporary generation for 26 sites across 12 counties. Facilities supported included major transportation thoroughfares, water treatment plants, medical centers, county emergency services, and fire departments.

In 2020, PG&E plans to:

- Seek Commission approval through a Tier 2 Advice Letter to further enhance the SGIP program with a financial assistance offering for eligible medical baseline and critical facility customers (as defined in the SGIP proceeding D. 19-09-027). For residential customers, PG&E is proposing a

¹² The actual customers and community resources served by a temporary microgrid vary and are determined by geographic location of the community resources, safety considerations, and grid infrastructure design considerations.

¹³ Societal continuity sites are a subset of Critical Facility customers who could pose a significant public health or safety risk with an unplanned loss of power or for whom a prolonged (48+ hour) outage would either directly or indirectly affect public health, safety, and welfare. Example facilities may include but are not limited to transmission-level customers and/or distribution-level impacts to major transportation, water and wastewater treatment facilities and hospitals.

Contractor Advance Program where PG&E could advance up to 50% of the eligible incentives upon reservation form approval with the remaining incentive to be paid after project completion. These contractors would provide a no cost installation for most targeted customers. For non-residential facilities, PG&E is proposing a revolving loan fund that will provide on-bill financing (OBF) for critical customers -- similar to the current program administered for energy efficient projects. PG&E will also ensure that energy efficiency and demand response programs are coordinated to support customer resiliency.

- Continue to engage directly with critical facilities to ensure that businesses' employees, tenants and customers know what to do during an emergency, including plans for backup power and the safety protocols for operating backup power.
- Continue to provide backup power-related education materials at each of PG&E's Community Open Houses and webinars planned in 2020.
- Continue to provide customers with a list of suppliers and contractors that may be able to assist critical facilities with purchasing or renting backup power sources, when requested.
- Provide customers with a list of suppliers and contractors that may be able to assist critical facilities with purchasing or renting backup power sources, when requested.
- Continue preparing to deploy temporary backup power if needed as a last resort to facilities during PSPS events, in alignment with PG&E's existing Portable Generator Use Standards. PG&E has included a proposal in the Microgrid OIR R.19-09-009 addressing the need to reserve temporary generation capacity to fulfill this emergency management function for the year.
- Expand Temporary Microgrid efforts consistent with plans filed in the Microgrid OIR R.19-09-009.

3.2 Outreach and Support for Medical Baseline/Access and Functional Needs

For our most vulnerable communities, including AFN customers, PG&E is exploring collaborations with key community organizations and enhancing engagement with the community and its customers about our wildfire safety efforts.

3.2.1 AFN/Medical Baseline Engagement and Outreach

As described in the previous PSPS progress report, leading up to the 2019 wildfire season, PG&E's AFN support focus was direct customer outreach and community engagement to increase preparedness and Medical Baseline enrollment, as well as obtain updated contact information for outage notifications, including the ability to add alternative contacts. To support AFN customers in 2019, PG&E provided direct support to AFN customers, and also engaged through collaborations.

Direct Customer Engagement:

- Conducted 1,500+ proactive calls to PG&E life support customers to update contact information and provide information about PSPS and emergency preparedness;
- Conducted ADA accessible customer webinars (with closed captioning available in Spanish, Chinese and English);
- Aired a public service announcement for customers who are dependent on medical devices and/or assistive technology requiring continuous electricity, directing them to visit their local independent living center (ILC) to learn about additional resources;
- Offered CRCs during PSPS events to provide safe, energized locations for customers, including Medical Baseline and AFN customers, to charge medical equipment during a PSPS event.

Collaboration with Community Based Organizations:

- Initiated a pilot program collaboration with the California Foundation for Independent Living Centers (CFILC) to provide AFN community members with support and resources to prepare for disasters and extended power outages. These resources may include but are not limited to: disaster preparedness information and in-event communications, food replacement options, temporary housing (if displaced), transportation resources, portable power stations and batteries and device charging.
- Emailed toolkits to more than 400 partners from nearly 200 CBOs regarding PSPS awareness and preparedness, our Medical Baseline Program and informational webinar invites;
- Hosted a specialized webinar for CBOs that serve persons with disabilities and/or AFN populations regarding our Community Wildfire Safety Program (CWSP), including PSPS and our Medical Baseline program;
- Conducted bi-annual trainings with contractors that serve PG&E's customers in the California Alternate Rates for Energy (CARE) program, which includes information on relevant PG&E programs including rate options and medical baseline programs, CWSP and PSPS, so they can assist with educating their clientele throughout the year;
- Provided emergency preparedness and PSPS literature to be shared through CBO communication channels and Energy Services Assistance (ESA) contractor networks; and
- Sponsored and participated in over 300 community meetings targeting the AFN population to provide information on CWSP, PSPS, backup power solutions, and the Medical Baseline Program including application forms.

In-Language Engagement:

- Provided in-language PSPS educational materials in Spanish, Chinese, Korean, Tagalog, Russian, Vietnamese and Braille at events and on pge.com;
- Produced in-language Medical Baseline educational videos in English, Spanish, Mandarin, Tagalog, Vietnamese and Hmong;
- Conducted outreach to more than 150 multicultural media outlets throughout the year by participating in 323 in-language media interviews and providing 107 media visits. These efforts promote safety initiatives, including PSPS, to monolingual or difficult to reach populations that are limited in English proficiency (LEP). Collectively, these outlets reach more than 80 percent of LEP customers in PG&E's service areas.

In 2020, PG&E will continue direct outreach to the AFN population and amplify the support initiated in 2019. In addition, PG&E will leverage the scope and reach of CBOs to deliver specialized services to their residents who may or may not be customers of PG&E. This two-pronged approach allows information to reach a larger, more targeted audience. These activities may include but are not limited to:

- Amplifying PG&E's PSPS readiness message by engaging our CBO partners and PG&E contractors in a broad PSPS preparedness and education campaign;
- Broadening Medical Baseline enrollments through mass marketing and direct engagement with healthcare stakeholders;

- Identifying and promoting various resources offered to mitigate customer impacts from PSPS events via PG&E grant recipients (e.g. PG&E's CBO direct program);
- Expanding availability of emergency preparedness and PSPS-focused videos on pge.com and in-event messages on social media in American Sign Language;
- Engaging more CBOs in formal partnerships to provide AFN customers additional support during PSPS events, including in-language translated communications;
- Establishing an external Advisory Council, called the People with Disabilities and Aging Advisory Council, to confirm and identify additional emergency preparedness needs of the AFN community and facilitate the joint development of solutions with CBOs, while leveraging additional existing community-based resources to close remaining gaps; and
- Continuing to participate in relevant statewide advisory groups, such as the Disadvantaged Communities Advisory Board and Low-Income Oversight Board to solicit input on outreach strategies and partnerships, as well as a to-be-developed stated AFN Advisory Group.

4 Event Coordination

4.1 Notifications

PG&E recognizes the importance of providing timely, accurate and consistent notifications regarding PSPS events. PG&E also intends to provide distribution and transmission-level notifications consistent with the CPUC's recommended notification timeline¹⁴. To provide advance warning for PSPS events, PG&E sends direct notifications to potentially impacted customers via calls, text messaging, and e-mail. Additional steps are taken to notify customers enrolled in PG&E's Medical Baseline Program who rely on electric service for mobility or life sustaining medical reasons, to ensure they confirmed receipt of the notification to adequately prepare for an outage. To further alert the public in advance, and as more fully described in section 4.1.2, PG&E maintains a strong online presence with updates provided on PG&E's webpage, as well as on social media channels included Facebook, Twitter and NextDoor. PG&E also coordinates directly with the media, including multi-cultural news outlets to provide translated communications to their viewers/listeners/readers.

In 2020, PG&E is re-evaluating the customer and stakeholder notification strategy, including notification verbiage and content for clarity and comprehension. PG&E is also exploring additional enhancements to tools and systems used to both prepare for and execute on a PSPS event. Proposed enhancements will incorporate lessons learned from 2019 and are intended to improve the PSPS event implementation process. Through these improvements, PG&E expects to improve the accuracy and speed of impacted customer/stakeholder identification, and the subsequent timely generation of notifications and communications to the impacted customer and stakeholder population. PG&E recognizes that, if more PSPS communications are issued, more Public Safety Partners, cities, counties, tribes, critical facilities, and customers will have to prepare for an event.

PSPS impacts to transmission customers are especially dynamic and more complex as noted in Section 2.3. It is PG&E's expectation, which was validated in the 2019 PSPS events, that some transmission customers may experience a shorter notification window than customers served off distribution due to

¹⁴ D. 19-05-042, pp. A8-A9

the time needed to complete transmission-level impact analysis, including the power flow studies in conjunction with CAISO and system protection studies. Due to the complex nature of transmission customer impact evaluation, PG&E is actively identifying process improvement opportunities for identifying and notifying transmission customers and entities during a PSPS event, which would allow for them to receive notifications sooner.

With an understanding of these dynamic considerations at hand, PG&E has planned for multiple notification scenarios to account for pre-PSPS timelines. In PG&E's 2019 PSPS Progress report, PG&E shared three timeline scenarios of the general notification sequencing and channels of notifications to varying types of stakeholders, including Public Safety Partners, critical facilities, transmission customers, medical baseline customers and more.

PG&E continues to work closely with the CPUC, Cal OES, CAL FIRE, and Public Safety Partners to share information, ensure they are familiar with the notification format and messaging, and gain input on notification strategies including the Cal OES PSPS state notification form and approaches to support the AFN population.

4.1.1 PSPS Notification Process

There are no updates to the PSPS notification process since the last progress report. Based on feedback collected through direct customer research, as well as from cities, counties, tribes and agencies, PG&E is reevaluating its PSPS notification process as described above.

4.1.2 Public Information Resources and Alerts

4.1.2.1 Website

In addition to the direct customer notifications sent via phone, text and email, PG&E provides event-specific information on its website. After the 2019 PSPS events, PG&E recognized a number of lessons learned related to content, accessibility, stability and user experience. PG&E has developed a road map to improve the web experience for customers and the public to ensure they are provided with timely, accurate, user-friendly, accessible and translated event-specific information. In preparation for the 2020 wildfire season, PG&E is rebuilding its emergency website to ensure there are no stability issues, while also improving the overall web experience for the public and its customers. The site will include basic safety and preparedness information, all PSPS event information, including the maps in all seven languages. In 2020, PG&E will integrate the multiple customer impact maps that were previously separately available and a source of confusion in 2019. This includes creating a single online viewer with the Address Look-Up Tool for both PSPS planned and actual outages, the map of the physical footprint of the planned PSPS event, and the outage map (which includes estimated times of restoration for any outage, including PSPS).

4.1.2.2 Call Center

PG&E operates four contact centers in the state of California and provides 24/7 emergency live-agent service for customers to report emergencies, or obtain PSPS-related updates, as needed. PG&E's Contact Center agents are trained on how to handle customers dealing with natural gas and electric emergencies with specific procedures to escalate life-threatening situations, which is available for translation services in 240 languages.

PG&E's call center has undertaken extensive efforts to prepare for PSPS events in 2019 and, through both staffing and technology solutions, continues to enhance the capacity of its contact centers in advance of the 2020 season.

4.1.2.3 Media Engagement

During PSPS events, from the time PG&E announces the potential PSPS event, through the time customers are restored, PG&E maintains a strong media presence. Media engagement to keep customers and the public informed include: issuing new releases, providing event specific information on a regular basis to thousands of news outlets, including multi-cultural news organizations, conducting media briefings, maintaining social media presence, augmenting paid advertising and issuing radio spot ads. PG&E will continue these engagements in future PSPS events. PG&E will continue these engagements in future PSPS events.

4.1.2.4 Alerts for Non-PG&E Account Holders

To support the CPUC's recommendation to provide a means to notify non-customers of record, in 2019, PG&E developed notifications based on zip code. PG&E's PSPS Zip Code Alerts can be leveraged by community-based organizations, tenants of a master meter, renters, visitors, caretakers, or anyone else who may need to receive PSPS notifications where they are not a direct customer of record to PG&E. Community members can select one or more zip codes for which they would like to receive PSPS Zip Code Alerts or may select all zip codes in PG&E's service territory.

Currently, anyone is able to sign-up for the PSPS Zip Code Alerts through a toll-free number (877-900-OPGE / 877-900-0743) or via text (text "enroll" to 97633). Enrollment was promoted to community-based organizations, cities, counties, master metered customers of record, and all customers via direct outreach and at www.prepareforpowerdown.com.

Based on customer and stakeholder feedback in 2019, PG&E will revisit zip code alerts to explore additional options for both improving the alerts process, as well as the content included within those alerts.

4.1.3 Notification Templates

PG&E is in the process of reviewing all of its notification templates to streamline the verbiage, and incorporate feedback and recommendations from cities, counties, tribes, agencies and the general public. Once the notification message templates are updated, PG&E will continue to share these templates with Public Safety Partners to potentially use for their own community notification purposes. The notifications include different messages for four segments of customers: Public Safety Partners, including local and tribal agencies and CCAs, Medical Baseline customers, critical facilities, and general customers. Included in the notification templates will be variables allowing PG&E to provide information, including customer impact locations and estimated time of de-energization and restoration information. PG&E will also provide message templates, consistent with the Common Alerting Protocol, for use by the designated alert authorities as needed.

4.1.4 In-Language Notifications

Based on feedback and experience from the 2019 PSPS events, PG&E is in the process of updating the direct to customer notification message templates, as described above. Before the upcoming 2020

wildfire season, these new scripts for general customers and medical baseline customers will be translated into the seven languages as currently required by the Commission, including: English, Spanish, Chinese, Vietnamese, Tagalog, Korean and Russian. PG&E will also provide customers with the option to be transferred to PG&E's call center to receive translation services in other languages.

In 2019, PG&E sent PSPS notifications in English and Spanish (where a customer has specified this language preference with PG&E). Customers also had the option to view or listen to a message in Spanish even if language preference has not been provided by the customer. Of the approximately 11.5 million notifications sent via automated call, approximately 25,000 (or 0.2%) were sent in Spanish based on customer preference information available, and just over 13,000 (0.1% of total notifications) customers selected to listen to the notifications in Spanish.

As described in PSPS event reports, PG&E provided PSPS event updates on PG&E's website in all seven languages mentioned above. In 2020, as described above in section 4.1.2.1, PG&E intends to improve the in-language webpage content and customer experience by integrating language translations into the website improvements that will display event updates, maps, address lookup information in one of the seven languages referenced above.

Additionally, PG&E continues to make available translation services in its call center in over 240 languages when contacting PG&E's call center at 1-800-743-5000. For all field representative and low-income contractors, PG&E also has an in-language mobile application that can be leveraged in the event they need ASL interpreters and in-language translators, which were used in PSPS community events.

During PSPS events, PG&E coordinates with over 50 multi-cultural media outlets that provide daily broadcasts and communications to provide PSPS event-specific updates to their viewers/readers/listeners.

4.1.5 Alignment of Notifications to the Standardized Emergency Management System (SEMS) Framework and Common Alerting Protocol (CAP)

In 2019, PG&E utilized the Cal OES PPS state notification form to communicate during PPS events. A completed PPS state notification form will be emailed to Cal OES, in addition to email updates to the CPUC, to inform that the following key milestones have been achieved:

- EOC activation;
- At decision to de-energize;
- When de-energization is imminent;
- When pre-re-energization patrols are initiated; and
- When restoration (re-energization) is complete.

Notifications to all stakeholders will be consistent with the California Alert and Warning Guidelines and will answer the questions required by the CPUC¹⁵

¹⁵ D. 19-05-042, pg. A-17

PG&E will continue practices consistent with these requirements in 2020.

PG&E is in the process of developing Common Alerting Protocol (CAP) compliant messages and protocols that will allow jurisdictions with public alerting authority to send timely and appropriate messages to populations potentially impacted by a de-energization event. This implementation will be completed prior to the 2020 wildfire season.

Since the 2019 events, the joint IOUs, the CPUC, and Cal OES have met on a weekly basis to better coordinate among IOUs and the state including areas such as standardized training and communication methods.

4.1.6 Notification System Test

In the Fall of 2019 and prior to the PSPS events, PG&E conducted end-to-end process testing for the direct to customer notifications. This included notification tests with employees to validate planned functionality, as well as User Acceptance Testing (UAT), Production Verification Testing, and a number of end-to-end process tests to validate system stability and data integrity. PG&E also worked closely with its notification vendor, Message Broadcast, to conduct throughput testing to ensure Message Broadcast could sustain 900,000 notifications per hour per channel – an improvement made in May 2019.

To test the updated notification system prior to the 2020 wildfire season, PG&E is planning to send notifications to cities, counties, tribes, CCAs and/or other Public Safety Partners within its service territory in the late Summer 2020. This will also be an opportunity for agencies to opt out of PSPS notifications and/or provide their most recent information. For customer-related notification testing, PG&E will use a similar testing methodology used in 2019 as described above to validate system stability and data integrity after incorporating new processes and data.

Based on experience from the 2019 PSPS events, and the feedback received from interested stakeholders, including local government agencies, other Public Safety Partners, medical baseline customers and general customer feedback collected through various channels (e.g. digital surveys, interviews, listening sessions, co-creation sessions with employees and customers), PG&E is adjusting their notification approach as described in section 4.1. PG&E will ensure that the notification system is designed and tested to comply with the Telephone Consumer Protection Act (TCPA).

4.2 Event Coordination with Local Agencies

4.2.1 Requests to Embed Representatives in Emergency Operations Centers

PG&E has an emergency management liaison representative embedded at the State Operations Center (SOC) within Cal OES. This liaison is onsite when the SOC is open (Monday through Friday from 8am to 5pm) and provides a daily report to the State Warning Center that includes the potential for a PSPS event. This liaison provides the 7-day outlook for all-hazard emergencies to the State Warning Center, regardless if the SOC / Utility Operations Center (UOC) activates. When the SOC/UOC activates, PG&E will staff an additional liaison to coordinate between the State and PG&E EOC.

When PG&E's EOC is activated for a potential PSPS event, PG&E will make a liaison and GIS mapping representative available to provide in-person support at each impacted local jurisdiction EOC, if one has

activated and a PG&E representative is requested by the local jurisdiction. This representative will have direct communication with PG&E's EOC.

Local jurisdictions, tribes and other Public Safety Partners can also request to be embedded in PG&E's EOC. Due to space restrictions, Public Safety Partners will be located in an information center that is on the same floor as PG&E's central operations room. A PG&E EOC liaison will be onsite to provide event-specific information, access around the facility, and coordination to partners.

4.2.2 Additional Coordination Opportunities

During an event, a dedicated liaison representative, who will act as a single point of contact, will be provided to impacted counties and tribes. These liaisons will be available to provide real-time information and respond to local inquiries.

PG&E's EOC will also manage a dedicated email inbox that local government jurisdictions or tribes can utilize to contact PG&E 24-hours a day. Information will also be posted to PG&E's PSPS Portal and website, discussed further in Section 4.2.3. Based on feedback from cities, counties, tribes and agencies, PG&E is reevaluating its communications processes and protocols.

To enhance planning and preparedness, PG&E has requested a change to the practices for sharing medical baseline and critical customer information with first responders outside of an active PSPS event. PG&E's request is detailed in their Opening Comments¹⁶ to the *Administrative Law Judge's Ruling Requesting Comments on Proposed Additional and Modified De-energization Guidelines* issued on January 30, 2020.

4.2.3 Secure Information Sharing Portal

PG&E provides planning and event-specific information to state agencies, counties, cities, Community Choice Aggregators (CCAs) and tribes through a secure data transfer portal (referred to as the "PSPS Portal" or the "Portal"). Based on feedback received from Public Safety Partners, PG&E is reevaluating its secure information sharing portal processes and protocols. Example changes that are being considered include broadening the access to other Public Safety Partners, such as telecommunications providers and/or water agencies, and updating the portal to be more intuitive for users.

The information on the PSPS Portal includes but is not limited to: planning and event-specific maps, potentially impacted customer counts, sample notifications, event-specific updates, and community resource center locations. The Portal is also used as a way to provide confidential, event-specific customer data to agencies that require it to support community needs during an event. This includes names and addresses of medical baseline customers and (non-competitively sensitive) critical facilities in their jurisdiction. During an active PSPS event, at the time of the first notification to Public Safety Partners, PG&E will post maps and other event-specific information to the portal and PG&E's website. Information will be updated, as needed.

To ensure awareness of and access to the PSPS Portal, PG&E will coordinate with counties and tribes through the outreach noted in section 3.1.3. This is to help ensure emergency responders have access to

¹⁶ See PG&E's Opening Comments, p.22

<http://pgera.azurewebsites.net/Regulation/ValidateDocAccess?docID=595332>

the portal and are able to receive information prior to the 2020 wildfire season. To date, more than 1,000 users across 320 jurisdictions, which include cities, counties, state and federal agencies, have secured access to the PSPS Portal.

5 Post De-Energization

5.1 Post De-Energization Reporting Requirements

PG&E has and will continue to submit de-energization reports to the service lists of this proceeding and Rulemaking 18-10-007. In addition, PG&E will post all reports to www.pge.com/psps, and service will include a link to the report in addition to contact information to submit comments to the CPUC SED Director. The de-energization reports filed by PG&E will include the information requested in ESRB-8 and D.19-05-042.