

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

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

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

**PACIFICORP'S PLAN TO ADDRESS ACCESS AND FUNCTIONAL
NEEDS DURING DE-ENERGIZATION EVENTS**

February 1, 2021

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PacifiCorp d/b/a Pacific Power (PacifiCorp or company) submits its plan to address access and functional needs (AFN) customers and communities during a de-energization event, attached as Attachment A. This plan is submitted consistent with Decision (D.) 20-05-051, Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electrical Facilities to Mitigate Wildfire Risk (the Phase 2 Decision), specifically Appendix A to the Phase 2 Decision (Appendix A), Section g, Medical Baseline and Access and Functional Needs Populations.

Respectfully submitted,

/s/ Tim Clark

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ATTACHMENT A

Access and Functional Needs Plan

A. AFN Populations

PacifiCorp currently serves approximately 45,000 customers in its California service area. In total, there are currently 247 customer critical accounts. Of this amount, 33 customers are identified as medically vulnerable, of which 28 are recorded as medical baseline accounts.

B. Process and System Changes

To improve PSPS notification to AFN populations, PacifiCorp made process/attribution changes in its customer service system to ensure that medically vulnerable customer accounts are noted as such. The additions to the customer service system included adding capability for updating and recording a customer's medical support needs, interface to communicate this record to outage reporting systems and customer account tables to prepare for a PSPS, in addition to developing processes to query such information in preparation for a PSPS, as well as creating notification processes to ensure clean handoffs between PacifiCorp's Incident Command Team and Public Safety Partners, should additional support for these customers be required during an activation. This augmented the system changes that captured information related to critical customers, affording additional advanced notification.

Additionally, as a policy, PacifiCorp suspends any service disconnection for non-payment during emergencies, including those involving elevated fire risk, such as the activation of a public safety power shutoff (PSPS).

C. Communication, Outreach and Effectiveness

1. Communication Channels

During 2020, PacifiCorp conducted outreach and education through multiple channels including targeted bill messages and distribution of brochures through community-based organizations (CBOs)¹ in order to encourage medically vulnerable customers to self-identify with the utility and verify their contact information.

2. Master-Meter Accounts

For customers served by master meters (14 customers, 12 of which are unique customer accounts, that serve 277 possible tenants) or where such customers are not the account holder, the company conducted mail outreach and communicated that their medical support needs could be recorded on the account holder's record to ensure sufficient advance notification occurred via their landlord.

3. Outreach Effectiveness

In PacifiCorp's annual survey,² 51 percent of surveyed customers stated they are aware they can update their contact information with PacifiCorp, and nearly two thirds of those have done so. Among those with medical conditions, awareness is low that PacifiCorp provides additional notices prior to a public safety power shutoff event, so special effort is required to educate them about additional communications, and how to update their contact information and contact preferences so they can be easily reached prior to an event.

¹ See Exhibit A, California Assistance and Support Programs and Exhibit B, PSPS Bill Message.

² PacifiCorp's detailed independent survey results as filed in R.18-10-007 on December 31, 2020.

The 2021 communications and outreach strategy will prioritize and emphasize this message along with general wildfire safety and preparedness information. As part of its Emergency Action Plan, PacifiCorp conducts tabletop actions as well as “lessons learned” sessions with key stakeholders including Public Safety Partners, such as Siskiyou County Emergency Management. During these listening sessions, stakeholders are requested to provide feedback to the Plan that are designed to improve future activations of the Plan. As a part of the review of the single PSPS activation and the additional “watch” events in the company’s history,³ feedback received indicated that the company’s communications and notification processes were robust, including recognition of the collaborative efforts that could be required to support the communities, and particularly those that have indicated need for support due to medical vulnerabilities. In PacifiCorp’s 2020 PSPS Annual Report, the company was able to demonstrate that for the single PSPS event conducted during 2020 (which impacted a total of 2,558 customer accounts), positive confirmation that notifications were received by the five medically vulnerable customers was achieved (four were self-identified, while one was a medical baseline account holder).

D. Engagement with CBOs and Public Safety Partners

The company’s annual survey also included interviews with four CBOs so PacifiCorp could better understand how to engage with this group in a meaningful way to, in turn, ensure targeted wildfire and PSPS communications reach customers through this channel. Insights gained from these interviews will be utilized to build awareness amongst AFN groups through

³ Reports on the September 2020 PSPS event and October 2020 PSPS watch are available at <https://www.pacificpower.net/outages-safety/wildfire-safety/public-safety-power-shutoff.html>.

CBOs. The interviewed CBOs expressed they routinely provide helpful information for those with medical needs to ensure they are able to adequately prepare for a PSPS event or evacuation. PacifiCorp is working to synergize targeted AFN messages between the company and CBOs ahead of the 2021 wildfire season.

PacifiCorp collaborated with Public Safety Partners, county health professionals, emergency responders and CBOs, including tribal representatives to ensure awareness of contact information and resourcing options during a PSPS. The company continues to reach out to advance the understanding amongst partners and the public regarding the importance of providing contact information. Throughout the year, the company will augment its Public Safety Partner conversations with this message. If face-to-face meetings are not able to be conducted safely due to the ongoing COVID-19 pandemic, the company will hold Public Safety Partner meetings virtually or telephonically.

As noted in PacifiCorp's second progress report filed on December 8, 2020, the company is also recruiting representation for its Wildfire Safety Advisory Board to address specific needs of AFN populations.

E. Conclusion

When a PSPS is warranted, PacifiCorp will effectively communicate with customers and work with local government officials to minimize the impact to its customers and communities, especially AFN populations, consistent with all the Guidelines identified in R.18-12-005, including those in the Phase 2 Guidelines.

EXHIBIT A



Reassurance and savings

If you or a family member need assistance, we're here to lend a helping hand. Pacific Power supports programs that lend a helping hand, like our energy assistance programs, available to income-qualifying households, and through additional electricity allowances for households with qualifying medical conditions.

Learn more and apply

To update your contact information, learn more and apply for these assistance programs and get tips on outage preparedness, visit pacificpower.net or call 1-888-221-7070.

Si necesita hablar con un representante que habla español, llame al 1-888-225-2611.

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California

Assistance and Support Programs



Medical Baseline Program

If you or a family member is on life support or has a serious medical condition, we can help. If you or someone who lives with you full-time is required to use an electricity-dependent medical device, let us know. We can help. Qualifying customers receive approximately 500 additional kilowatt-hours per month, which are added to the lowest residential tiered rate to offset increases in cost and energy usage due to medical equipment.

A Medical or Life Support Equipment Certificate must be completed by a qualified medical professional certifying that a member of the household is using medical equipment on a regular basis required to maintain life or has a medical condition that would be adversely affected if electric service is disconnected.

The Medical Baseline certificate does not guarantee that power will not be interrupted from weather-related outages, other circumstances outside of Pacific Power's control, or service disconnection for bill nonpayment. It does allow Pacific Power to assist you in managing your electricity bills beyond what is normally allowed. Learn more at pacificpower.net/medical.

California Alternate Rates for Energy Program (CARE)

If you are having trouble paying your bill, you may be eligible for a 20 percent discount on your Pacific Power bill through CARE. CARE is available to residential customers who meet income requirements.

You may also be eligible for CARE if you are enrolled in public assistance programs such as Medicaid/Medi-Cal; Women, Infants and Children Program (WIC); Supplemental Security Income (SSI); Bureau of Indian Affairs; Head Start Income Eligible (Tribal Only); or Temporary Assistance for Needy Families (TANF) or Tribal TANF.

For more information and to see if you qualify, visit pacificpower.net/care.



Outage Preparedness

A storm, wildfire or other emergency can happen at any time. That's why it's important to have a plan ready, year-round, in case power goes out.

- Keep a two-week supply of shelf-stable food and water for all people and pets in your home.
- Gather a backup supply of essential medicines.
- Create an emergency kit with flashlights, fresh batteries, solar phone chargers, first aid, essential phone numbers and cash.
- Do not use candles if oxygen equipment is in use.
- Check with your supplier to assist with emergency back-up plans for any medical equipment.
- Before buying a generator make sure it is appropriate for your home.

Update your contact information with Pacific Power

Communication is a big part of staying safe. In the event of a power outage, we will use all available options to keep you informed, including social media and by reaching out to you directly by phone, text or email.

Qualifying customers would also receive additional notifications prior to a Public Safety Power Shutoff due to severe weather conditions.

Please take a moment to update your contact information so we can reach you if we need to at pacificpower.net.

EXHIBIT B

Our Commitment to Wildfire Safety

Protecting your community while providing safe, reliable power is our highest priority.

Your home or business is located in a Public Safety Power Shutoff (PSPS) area. This means that under certain rare and hazardous weather conditions parts of our network within the PSPS zone could be proactively de-energized to ensure our electrical system is not the source of a wildfire.

PSPS actions are considered a last resort to ensure public safety, and are expected to be infrequent. In areas at a higher risk of wildfire, we are investing in wildfire mitigation technologies, clearing more plants and trees away from power poles and lines and working closely with state and local agencies on wildfire prevention solutions.

If you have medical equipment in your home that requires electricity to function, please work with your medical provider to have a back-up plan if a power outage were to happen. Also call our customer care center so we can mark it in our customer care system. **1-888-221-7070**

For more information, visit our online wildfire safety resource center where you can access an easy-to-use interactive map to view PSPS areas and view the 7-day status forecasts in these designated zones. www.pacificpower.net/wildfiresafety.

Nuestro compromiso con la seguridad contra incendios forestales

Proteger a su comunidad al proporcionar energía segura y confiable es nuestra máxima prioridad.

Su hogar o negocio está ubicado en un área que Corte del Suministro Eléctrico por Motivos de Seguridad Pública (o por sus siglas en inglés: PSPS). Esto significa que, bajo ciertas condiciones climáticas raras y peligrosas, partes de nuestra red de servicio dentro de la zona PSPS podrían ser desactivadas de manera proactiva para garantizar que nuestro sistema eléctrico no sea la fuente de un incendio forestal.

Un PSPS se considera un último recurso para garantizar la seguridad pública y se espera que sea poco frecuente. En áreas con mayor riesgo de incendios forestales, estamos invirtiendo en tecnologías de mitigación de incendios forestales, quitando más plantas y árboles de los postes y líneas eléctricas y trabajando estrechamente con las agencias estatales y locales en soluciones de prevención de incendios forestales.

Si tiene equipos médicos en su hogar que requieren electricidad para funcionar, comuníquese con su proveedor médico para tener un plan de respaldo si ocurriera un corte de electricidad. También llame a nuestro centro de atención al cliente para que podamos marcarlo en nuestro sistema.

Para cualquier pregunta o para obtener más información sobre lo que estamos haciendo para mantener segura a su comunidad, llame al: **1-888-225-2611**.