

**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)

**2025 ANNUAL ACCESS AND FUNCTIONAL NEEDS PLAN
OF PACIFICORP (U 901 E)**

Dated: January 31, 2025

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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. The Company has made efforts to align this plan with the joint investor-owned utility working group AFN Plan template, as appropriate. This plan is submitted consistent with Decision (D.) 21-06-034 issued June 24, 2021, Decision Adopting Phase 3 Revised and Additional Guidelines and Rules for Public Safety Power Shutoffs (Proactive De-Energizations) of Electric Facilities to Mitigate Wildfire Risk caused by utility infrastructure, specifically Appendix A to the Phase 3 Decision (Appendix A), Section K, Reporting.

Dated: January 31, 2025

Respectfully submitted,

/s/

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ATTACHMENT A

PacifiCorp

Plan to Support Populations with Access and Functional Needs During Public Safety Power Shutoffs

January 31, 2025



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EXECUTIVE SUMMARY

During extreme weather conditions, utilities may temporarily turn off power to specific areas to protect the safety of customers and communities, enacting a Public Safety Power Shutoff (PSPS), which continues to be a necessary tool of last resort to prevent our electric system from becoming a source of wildfire ignition. To support individuals with Access and Functional Needs (AFN) during PSPS, each of the Investor-Owned Utilities (IOUs) developed its respective 2025 Annual AFN PSPS Plan (“AFN Plan” or “Plan”) with assistance from regional and statewide AFN stakeholders, representing a broad spectrum of expertise. The Plan leverages Federal Emergency Management Administration’s (FEMA) Developing and Maintaining Emergency Operations Plans Comprehensive Preparedness Guide 101 Six-Step Process.¹

The IOUs are committed to addressing the needs of individuals with AFN before, during, and after a PSPS and have established a partnership with the AFN Collaborative Council and the AFN Core Planning Team² to seek guidance and address the “Why,” “Who,” “What,” and “How” to better mitigate risk and support individuals with AFN.

PacifiCorp acknowledges and is thankful to the Joint IOUs, AFN Collaborative Council and AFN Core Planning Team for their guidance and commitment in developing the 2025 AFN Plan template.

WHY

As climate conditions change, the threat of wildfires in California continues to grow. One critical tool used to prevent wildfires is the use of PSPS, in which an IOU may temporarily shut off power to a neighborhood during dangerous weather conditions to prevent the electric system from becoming a source of ignition. These safety shutoffs are a measure of last resort for keeping customers and communities safe. A PSPS, although necessary, disrupts the everyday lives of impacted individuals, including those with AFN and/or those who may be electricity dependent, which will be discussed further in this Plan. The purpose of this Plan is to mitigate the impact of PSPS events on individuals with AFN.

¹ For details on how to develop and maintain Emergency Operations Plans, visit: Developing and Maintaining Emergency Operations Plans Comprehensive Preparedness Guide (fema.gov)

² See Appendix A for members of the AFN Core Planning Team and Collaborative Council

WHO

The IOUs have made progress in identifying individuals with AFN across their respective service areas, collectively identifying approximately 4 million³ people in the state through defining, mapping, enabling, and promoting self-identification. In order to support and target individuals that are electricity dependent, the Joint IOU Statewide AFN Advisory Council⁴ and AFN Core Planning Team developed a definition of Electricity Dependent Individuals⁵ that this Plan seeks to support. That definition remains unchanged from 2022.

Electricity Dependent Definition: Individuals who are at an increased risk of harm to their health, safety, and independence during a PSPS event for reasons including, but not limited to:

- Medical and Non-medical
- Behavioral, Mental and Emotional Health
- Mobility and Movement
- Communication

PacifiCorp understands there is more work to be done and will continue these efforts to identify additional individuals with AFN in 2025.

WHAT & HOW

Working alongside the AFN Collaborative Council and AFN Core Planning Team, PacifiCorp stays informed of the IOU's goals, objectives, and potential opportunities for enhancements in 2025. PacifiCorp continues to monitor and incorporate input from this process. The overarching goal is to mitigate impacts of a PSPS on individuals with AFN, served by PacifiCorp, through improved customer outreach, education, assistance programs and services.

³ Represents total counts of AFN designations in each of the IOU's database not unique individuals or accounts.

⁴ See Appendix A for a list of the members of the Joint IOU Statewide AFN Advisory Council.

⁵ IOUs will strive to implement this proposed definition contingent on operational feasibility and in alignment with AFN identification requirements with the CPUC's PSPS decisions. The IOUs will continue to collaborate with AFN stakeholders to refine this definition as appropriate.

1. INTRODUCTION

In accordance with the California Public Utilities Commission (Commission or CPUC) Decision (D.) 21-06-034 Guidelines issued in Phase 3 of Rulemaking 18-12-005 (Phase 3 PSPS Decision) and using the Six-Step Planning Process in the Federal Emergency Management Agency’s (FEMA) Developing and Maintaining Emergency Operations Plans Comprehensive Preparedness Guide 101, the Joint IOUs worked collaboratively with the AFN Core Planning Team to implement the “Whole Community”⁶ approach to develop an overarching Joint IOU statewide strategy to meet the diverse needs of individuals with AFN.

Each California IOU will file their respective 2025 AFN Plans with the CPUC by January 31, detailing their programs to support people and communities with AFN before, during, and after a PSPS. The IOUs will provide the CPUC with quarterly updates regarding progress toward meeting the established objectives and the impact of their efforts to address this population before, during, and after PSPS, while optimizing opportunities for consistency where possible.

1.1 Subject Matter Experts

According to FEMA Step 1: Engaging the Whole Community in the Planning — Engaging in community-based planning, planning that is for the whole community and involves the whole community, is crucial to the success of any plan.

On September 17, 2024, the IOUs introduced this effort at the broader Q3 Joint IOU Statewide AFN Advisory Council meeting, invited participation, and subsequently held a kick-off meeting with Core Planning Team⁷ members on October 23, 2024. The 2025 AFN Core Planning Team comprises eight organizations representing the diverse needs of the AFN community.

⁶ Whole Community approach as defined by FEMA, refers to preparedness as a shared responsibility and involvement of everyone, including but not limited to individuals and families with access and functional needs. Complete definition available at www.fema.gov/about/glossary (scroll down to “Whole Community”).

⁷ See Appendix A.

Table 1 below reflects the organizations involved in the development of the 2025 AFN Plan.

Table 1. Engaging the Whole Community

Planning Group	Participants/Stakeholders
AFN Collaborative Council (per the Phase 3 PSPS Decision):	California Foundation for Independent Living Centers (CFILC)
	California Health & Human Services (CHHS)
	California Office of Emergency Services (Cal OES)
	Disability Rights California (DRC)
	Disability Rights Education & Defense Fund (DREDF)
	State Council on Developmental Disabilities (SCDD)
	2-1-1 ⁸
AFN Core Planning Team	Department of Developmental Services
	Disability Policy Consultant
	Inland Regional Center
	PacifiCorp
	Redwood Coast Regional Center
	San Diego Regional Center
	San Gabriel/ Pomona Regional Center
Tri-Counties Regional Center	
Joint IOUs	San Diego Gas & Electric (SDG&E)
	Southern California Edison (SCE)
	Pacific Gas & Electric (PG&E)

As a key component to engaging the Whole Community in planning, the IOUs will continue to solicit feedback from the AFN Collaborative Council, the Joint IOU Statewide AFN Advisory Council, each utility’s respective Regional PSPS Working Groups and other regional and statewide AFN experts such as community-based organizations (CBOs), healthcare partners, representatives of durable medical equipment, and local government agencies. These groups serve as thought leaders and offer insight, feedback, and input on each IOUs’ customer outreach strategy, programs, and priorities. The IOUs seek to conduct regular meetings to actively identify issues, opportunities, and challenges related to the IOUs’ ability to mitigate the impacts of wildfire safety strategies, namely PSPS.

⁸ Although 2-1-1 was not required per the Phase 3 PSPS Decision, they have been invited to join the AFN Collaborative Council.

The planning process presented herein provides opportunities to collect feedback and implement strategic improvements with details included in specific IOU plans. The Joint IOUs continue to look at expansion of program offerings, refresh the Joint IOU statewide PSPS Preparedness website, www.PrepareForPowerDown.com, conduct outreach and education, as well as expand access to eligible populations. PacifiCorp continues to learn from these efforts and best practices set forth by the Joint IOUs.

1.2 Purpose, Scope, Situational Overview and Assumptions

1.2.1 Purpose/Background — WHY

The Plan focuses on mitigating the impacts of PSPS for individuals with AFN. The IOUs intend to build on this Plan and strive for continuous improvement based on insights from the experts and feedback channels outlined in this plan. Each IOU's respective 2025 AFN Plan addresses the following:

- Who the IOUs need to communicate with
- What resources and services are needed during PSPS
- How the IOUs communicate with individuals with AFN
- How the IOUs make resources and services available to individuals with AFN

1.2.2 Scope — WHO

The Joint IOUs and the CPUC recognize the definition of AFN as defined by the California Government Code §8593.3: “individuals who have developmental disabilities, physical disabilities, chronic conditions, injuries, limited English proficiencies, who are non-English speaking, older adults, children, people living in institutional settings, or those who are low income, homeless, or transportation disadvantaged, including but not limited to, those who are dependent on public transit and those who are pregnant.”

Acknowledging that the California Government Code definition of AFN is broad, the CPUC authorized the IOUs to follow the FEMA 6-Step Process by engaging the Whole Community through the Joint IOU Statewide AFN Advisory Council to create a common definition of “Electricity Dependent.” Therefore, the IOUs use this common definition to help inform new enhancements to programs and resources currently available.

Electricity Dependent: Individuals who are at an increased risk of harm to their health, safety, and independence during a Public Safety Power Shutoff, for reasons including, but not limited to:

- Medical and Non-medical
- Behavioral, Mental and Emotional Health
- Mobility and Movement
- Communication

Examples of Electricity Dependent include, but are not limited to:

- **Medical and Non-medical:**
 - Respiratory equipment: oxygen, respirator, inhalation therapy, apnea monitoring, suction machines, airway clearance, Airway Clearances Vests, cough assistive devices, hemodialysis
 - Nutritional equipment: gastric feed tube, specialized diet meal preparation equipment (e.g., feeding pumps, blenders)
 - Heating/cooling equipment: refrigeration, body temperature regulation
- **Behavioral, Mental, and Emotional Health:**
 - Powered equipment supporting regulation of emotional behaviors (e.g., sensory lights)
- **Mobility and Movement:**
 - Positioning equipment: Lift, mobility tracking system, power wheelchairs and mobility scooters, in home chair lift, electric bed
- **Communication:**
 - Augmentative communication devices (e.g., tablets, wearables, eye gaze), alert systems
 - Powered equipment for hearing or vision support (e.g., alert systems)

1.2.3 Situational Overview

According to FEMA Step 2: Understand the Situation — Understanding the consequences of a potential incident requires gathering information about the potential AFN of residents within the community.

The phrase “Understand the Situation” continues with identifying risks and hazards. The assessment helps a planning team decide which hazards or threats merit special attention, what actions must be planned for, and the resources likely to be needed.

The Core Planning Team has identified the following key risks of PSPS:

- Individuals with AFN are unable to use power for devices or equipment for health, safety, and independence due to a PSPS.

During the planning process, the AFN Core Planning Team emphasized that the needs of individuals with AFN extend well beyond medical devices alone and that the risks are as diverse as the population. The IOUs recognize that the impacts of a PSPS are dynamic and are committed to supporting customers before, during and after a PSPS.

AFN Population and Identification

PacifiCorp has made progress and continues to seek improvements to identifying AFN individuals who are electricity dependent through program enrollments and enabling more customers to self-identify. PacifiCorp identifies the following customers as AFN in the company’s customer service system:

- Customers enrolled in the following programs:
 - Medical Certification
 - Medical Baseline (MBL), including Life-Support (Critical Care)
- Customers who self-identify
 - As having a medical condition
 - As having an AFN

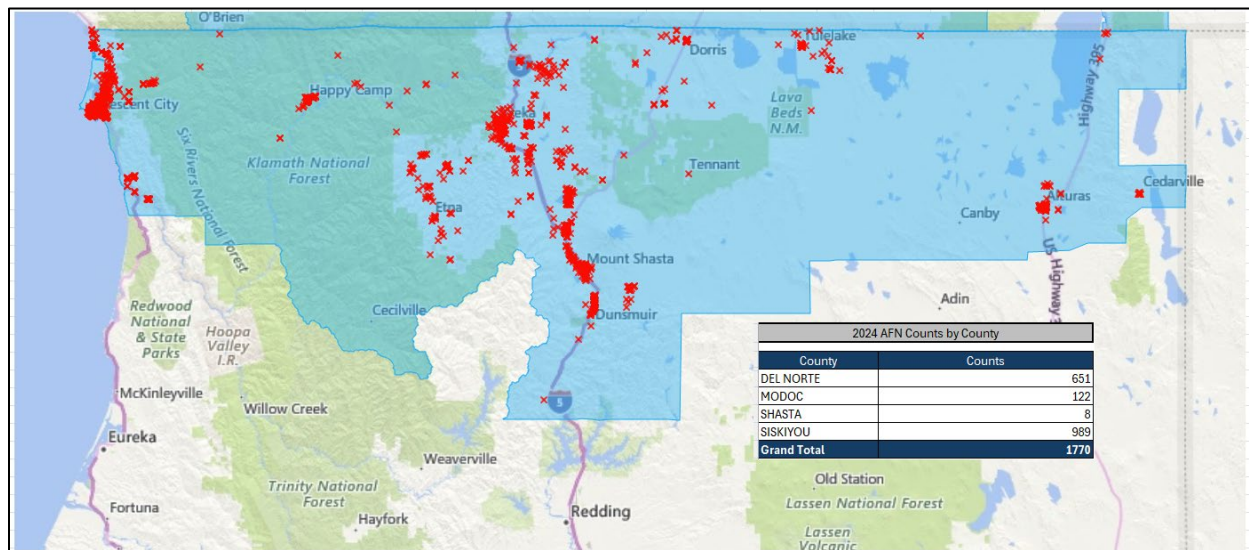
Table 2 below accounts for the number of customers identified as AFN in PacifiCorp’s service territory.

Table 2. PacifiCorp’s Customers with Access and Functional Needs

Customers with Medical Certificates and/or MBL	Customers self-identified as having a medical condition or other AFN (Beyond medical certificates and MBL)	Percentage of Customers Identified as AFN Based on Total Residential Customer Base
133	1637	4.82%

PacifiCorp’s AFN density map shown in Figure 1 allows the Company to quickly identify geographic areas that have larger populations of AFN customers. This map enables PacifiCorp to strategically allocate resources by geography such as staffing a community resource center for customers experiencing a PSPS.

Figure 1. Service Area Map of PacifiCorp Customers with AFN



1.2.4 Planning Assumptions

Below are the initial planning assumptions used to develop the annual AFN Plan:

- For PSPS, every effort is made to provide notification in advance of power shutoff
- Effective support of individuals with AFN requires a Whole Community⁹ approach (e.g., utilities, CBOs, non-profits organizations, government agencies)
- PSPS may occur concurrently with unrelated emergencies (e.g., active wildfires, earthquake, cyber-attacks, technological hazard incidents)
- The scope of PSPS can increase or decrease as weather conditions are monitored across the service area

1.3 Operational Priorities – WHAT

According to FEMA Step 3: Operational Priorities – specifying what the responding organizations are to accomplish to achieve a desired end-state for the operation.

The goal of the AFN Plan is to mitigate the impacts of PSPS on individuals with AFN served by the IOUs through improved customer outreach, education, assistance programs and services. PacifiCorp will continue its commitment to mitigating impacts of PSPS by focusing on key objectives identified through the 2025 planning meetings: Progress will be reported out in the quarterly updates submitted to the CPUC.

2025 Key Objectives:

- Increase awareness of IOU programs and services available before, during, and after a PSPS activation
- Continue to identify individuals who are Electricity Dependent
- Identify enhancements to programs and resources needed to mitigate the impacts of PSPS
- Coordinate and integrate resources with state, community and utility to minimize duplication

⁹ The term “Whole Community” refers to the concept as discussed in the FEMA Six Step Comprehensive Preparedness Guide.

1.4 Plan Development

According to FEMA Step 4: Plan Development – Develop and Analyze Courses of Action – This step is a process of generating, comparing, and selecting possible solutions for achieving the goals and objectives identified in Step 3.

The IOUs have worked to deliver consistent services and resource offerings; however, the delivery and eligibility are likely to differ by service area. Proposed recommendations to meet the Key Objectives for 2025:

Increase awareness of our programs and services available before, during and after a PSPS

- Increase awareness among PacifiCorp’s Wildfire Advisory Board (Board) members via presentations/materials
- Engage with the Board, CBOs, health care coalitions and other local AFN service providers to identify opportunities to amplify AFN program messaging
- Explore making appropriate updates to PSPS materials to reflect the needs of individuals with AFN

Continue to identify individuals who are Electricity Dependent

- Enhance existing marketing and outreach campaigns based on data and feedback received through surveys and interviews
- Continue to work with CBOs, Regional Centers and healthcare organizations to ensure their clients are informed about available PSPS resources
- Partner with Wildfire Advisory Board members and other AFN service providers to better understand the needs of AFN customers and gaps in PacifiCorp’s current offerings

Identify new enhancements to programs and resources needed to mitigate the impacts of PSPS

- Continue to review customer feedback from PSPS survey results, including CRC survey results, to benchmark and evaluate if programmatic changes are needed to enhance existing resources and support

Coordinate and integrate resources with state, community, utility to minimize duplication

- Identify opportunities and efficiencies to ease Medical Baseline (MBL) program enrollment in accordance with CPUC and legislative framework

1.5 Plan Preparation and Review

According to FEMA Step 5: Plan Preparation, Review, and Approval – This step is a process of preparing the document and getting it ready for implementation.

Each IOU will file their respective 2025 AFN Plans with the CPUC by January 31, detailing its programs to support individuals and communities with AFN before, during, and after PSPS.

PacifiCorp continues to use the Joint IOU template, maintaining consistency with that template where possible.

1.6 Plan Implementation

According to FEMA Step 6: Implement and Maintain the Plan – This step is the final step which is an ongoing process of training personnel to perform tasks identified in the plan, exercising, and evaluating plan effectiveness, and revising and maintaining the plan.

Upon filing the AFN plan, each IOU will implement new and maintain existing goals and objectives as specified in the Plan. Additionally, the IOUs will continue to provide quarterly updates on progress made.

1.7 Research and Surveys

In 2025, the IOUs will continue to collaborate and share best practices as they solicit feedback about PSPS resources offered to individuals with AFN through a variety of channels, including consultation with various advisory groups.

PacifiCorp will continue to solicit feedback from working groups, local governments, tribes, and critical facilities; webinars for customers and communities; wildfire and PSPS awareness studies; feedback via digital channels; PSPS Tabletop Exercises; and notification message testing.

PacifiCorp conducts two rounds of surveys and interviews each year to assess the company's wildfire safety communication campaigns. Survey results are utilized to assess the key performance indicators described in Section 1.8 Success Measures and Metrics. Survey and interview results are located in Appendix D.

As a result of feedback and research from CBOs, local governments, and tribes who support AFN populations, the IOUs are committed to continuously reviewing the needs of individuals with AFN before, during, and after PSPS. This thorough review allows the IOUs to enhance support for individuals who rely on electricity to maintain necessary life functions, including those who utilize durable medical equipment and assistive technology.

1.8 Success Measures and Metrics

In 2025, PacifiCorp will continue to use the Key Performance Indicators (KPIs) initially developed with the AFN Core Planning Team for the 2022 AFN Plan. These KPIs seek to measure the impacts of PSPS on individuals with AFN, awareness of support programs, and satisfaction of services offered during a PSPS. The most recent pre- and post- season survey results that address the KPIs can be found in Appendix D of this report.

Key Performance Indicators:

1. The percentage of individuals with AFN who were aware of what support and resources were available to them during a PSPS
2. The percentage of individuals with AFN who were able to use necessary medical equipment to maintain necessary life functions for the duration of any PSPS that affected them
3. The percentage of individuals who used mitigation services (e.g. CRCs, backup power programs) and reported satisfaction with the level of support received

While Section one is a high-level overview of the IOUs' shared vision, the details of PacifiCorp's AFN Plan can be found in Sections two through five of this Plan. PacifiCorp will continue to remain informed of lessons and best practices identified across the IOUs and strive to improve AFN support where services and partnerships are available.

2. CONCEPT OF OPERATIONS - HOW

This concept of operations describes PacifiCorp's approach to supporting customers with access and functional needs before (preparedness), during (response) and after (recovery) a PSPS.

2.1 Preparedness/Readiness (Before Power Shutoff)

PacifiCorp's AFN customers can access information on wildfire preparedness and programs through communication campaigns, outreach, personal contact and when an event is forecasted, in real-time on the Company's website.¹⁰ All customers have access to the Company's online webinars, events, and preparedness information to ensure that any non-identified AFN customers have an opportunity to access resources. PacifiCorp's AFN and wildfire programs are identified below. In 2025, the Company will continue its commitment to providing programs and services that are easily accessible to customers.

2.1.1 AFN Identification

PacifiCorp understands the importance of identifying customers with AFN through a variety of channels. Customer service representatives are trained to listen for key words during phone conversations which trigger them to ensure whether it is appropriate for the customer account to have an AFN designation. When a customer identifies as having AFN, the customer service representative will flag the customer's account and will share information about AFN programs for which the customer may be eligible.

In 2021, PacifiCorp added a check box on the California Alternate Rates for Energy (CARE) application for customers to self-identify as AFN. Due to the update to the CARE applications, an additional 997 customers have self-identified as AFN. In 2024 alone, PacifiCorp saw an additional 527 newly identified AFN customers via the CARE application and an overall increase of 127% since the modification of the CARE application in 2021. The increase in enrollments through this channel demonstrates that updates to the Company's CARE application have - and will likely continue to have - positive results. From 2023 to 2024, the Company had a 42% increase in AFN customers.

PacifiCorp recognizes the importance of continuing to identify customers with medical baseline and other AFN. In 2025, PacifiCorp will expand its self-identification outreach campaign through updated marketing materials, website enhancements and targeted outreach to AFN customers through regional centers, Tribal partners, healthcare organizations and other AFN service providers.

¹⁰ <https://www.pacificpower.net/outages-safety/wildfire-safety/public-safety-power-shutoff.html>

2.1.2 Backup power programs

Portable Battery and Backup Electric Power Generator Rebate Programs¹¹

PacifiCorp offers a backup electric power rebate for residential customers in its California service territory. All residential customers are eligible to claim a rebate of up to \$300 for the purchase of a backup power supply and customers enrolled in the Medical Certificate or California Medical Baseline Program are eligible to claim a rebate of up to \$800. Items approved for the rebate program include portable batteries, power stations, and gasoline generator options. Tenants and property owners are eligible to claim a rebate. To date, 706 customers have received rebates.

In 2025, PacifiCorp will review the Backup Electric Power – Generator Rebate Program’s webpage for improvements to streamline information and increase accessibility. In addition, PacifiCorp will coordinate with the Board, CBOs, healthcare organizations and other AFN service providers to identify opportunities to amplify and broaden messaging about the Company’s backup power programs.

Free Portable Battery Program

PacifiCorp offers free portable batteries to customers receiving the California Alternate Rates for Energy (CARE) and those enrolled in the Baseline Program. The program includes contracted services to provide comprehensive customer outreach, a backup power needs assessment, and delivery and setup of portable batteries. As part of delivery and setup, program participants receive individual education about proper use and maintenance of their device, and ongoing remote technical support as needed. A total of 94 medical baseline customers have received a portable battery to-date.

In 2025, PacifiCorp will review the Backup Electric Power – Free Portable Battery Program’s webpage for improvements to streamline information and increase accessibility. In addition, PacifiCorp will coordinate with the Board, CBOs, healthcare organizations and other AFN service providers to identify opportunities to amplify messaging about the Company’s backup power programs.

¹¹ See PacifiCorp back up electric power website for more information, <https://www.pacificpower.net/outages-safety/storm-emergency-preparedness/backup-generators.html>

2.1.3 Resiliency Programs

PacifiCorp previously offered a grant program to communities seeking to enhance emergency preparedness with renewable generators and energy storage. This program has ended, and funds have been exhausted. A final report on resiliency efforts was submitted via Advice Letter 690-E on August 11, 2022, which contains a more detailed account of the program summarized below.

- No applications were received for portable renewable generators.
- Five technical studies were developed for critical facilities interested in learning more about the costs and benefits of increased on-site resiliency.
- Three critical facilities have been approved to receive grant funding for energy storage projects. As of January 31, 2023, two of those projects completed installation and have been awarded funding.
- The Yurok Tribe is the third and final applicant. A grant will formally be awarded upon completion of project construction and commissioning.

2.1.4 Customer Assistance Programs

Financial Assistance Programs

Medical Baseline (MBL) Allowance Program

PacifiCorp's MBL program helps customers who have additional energy needs for qualifying medical conditions. Qualifying residential customers receive a lower rate baseline allowance on their monthly energy bill. Customers in the MBL program are designated as AFN customers and receive additional notifications when possible, during PSPS events, and may be eligible for additional backup power program offerings.

California Alternate Rates for Energy (CARE) Program

PacifiCorp offers income-qualifying residential customers a 25% discount on monthly bills through the CARE program.

Low-Income Home Energy Assistance Program (LIHEAP)

PacifiCorp customers in low-income households may receive assistance with home energy costs. LIHEAP is administered by the California Department of Community Service and Development through local agencies.

Energy Assistance (ESA) Program

PacifiCorp partners with local community-based organizations to provide energy-saving improvements at no cost to income-qualifying homeowners and renters living in single-family homes, mobile homes or apartments.

Project HELP

PacifiCorp customers may be eligible for support through Project HELP, a nonprofit program administrated by The Salvation Army.

Additional Assistance Programs

Medical Certificates

PacifiCorp residential customers with a serious health condition that (1) could be aggravated by a loss of power in their home or (2) require electricity powered medical equipment in the home, can enroll in the medical certificate program to receive additional notifications when possible during PSPS events, and may be eligible for a baseline allowance at a lower rate and additional backup power opportunities. PacifiCorp's medical certificate online application is available in English and Spanish.

Gift Payment

PacifiCorp provides family and friends the opportunity to make a payment for a customer who may need assistance in paying their electric bill.

Equal Pay

PacifiCorp offers customers the option of paying the same amount each month, based on the average of the last 12 months of billing, allowing for easier budgeting and leveling out seasonal highs and lows.

2.1.5 Emergency Coordination Center

PacifiCorp has established an Emergency Coordination Center (ECC) following the National Incident Management System (NIMS) guidance. ECC staff is available to support all hazardous responses, including PSPS events.

The ECC plays a vital role in monitoring and verifying AFN customers are contacted throughout a PSPS event. AFN customers impacted by a PSPS are identified through a Geographic Information System customer list which is provided to the Company's customer service group and the ECC Executive. Customer service is responsible for providing PSPS notifications to all customers, and additional notifications to AFN customers. During each ECC meeting, customer service provides a status update on notifications and may escalate unmet needs of AFN customers to the ECC Executive to determine if additional action by the Company or local emergency management is required.

With the addition of an AFN Program Manager in 2024, a new AFN Coordinator position was established in the ECC. The AFN Coordinator coordinates with customer service, the Joint Information Team and the ECC Liaison to quickly relay and address unmet needs of AFN customers with local public safety partners. In 2025, PacifiCorp will seek opportunities to further develop the ECC AFN Coordinator role.

The ECC process is reviewed and submitted to the CPUC annually in the General Order 166 (GO 166) report. The April 2025 GO 166 Update will include how the ECC AFN Coordinator is integrated into the Company's incident management framework.

2.1.6 Training and Exercise

PacifiCorp conducts annual PSPS exercises utilizing a whole community approach. The training standards are being developed with other California IOUs and the California Office of Emergency Services, utilizing National Incident Management System (NIMS) courses. During exercise planning, emergency management agencies from tribal, state, county and local jurisdictions, community-based organizations, public health agencies, and any other potentially affected agency, are invited. PacifiCorp's annual PSPS exercises include components that test the Company's protocols related to access and functional needs during extended power outages, including notification processes.

PacifiCorp continues to enhance and expand the training program for ECC staff. Beginning in 2025, all ECC personnel are assigned to complete the following FEMA trainings:

- IS-100 Introduction to the Incident Command System
- IS-200 Basic Incident Command System for Initial Response
- IS-700 An Introduction to the National Incident Management System
- IS-800 An Introduction to the National Response Framework
- All-hazards specific training for each position

Additional training may be assigned for specialized positions based on decision making authority.

2.1.7 PSPS Preparedness Outreach and Community Engagement

Dissemination of timely, accurate, accessible, and actionable information to the public is important in all phases of PacifiCorp's incident management. Communication efforts are listed in the Company's Wildfire Mitigation Plan and Emergency Response Plan which describe the Company's communication and notification processes with public and partner organizations throughout the preparation, response, and restoration cycle. Communication with AFN customers and external partners as early as possible is essential. The PacifiCorp Joint Information Team has established processes and tools to facilitate communication with customers, the public, news organizations, government entities and other external stakeholders through social media, the Company's website, press releases and notification protocols to ensure consistent and comprehensive messaging.

PacifiCorp may continue to refine these communications processes in 2025, building off feedback and lessons learned during trainings, exercises, real world events, advisory groups, customer surveys and partner interviews.

PacifiCorp Wildfire Advisory Board

In addition to participating in the Joint IOUs' advisory and planning efforts, PacifiCorp established a Wildfire Advisory Board (Board) in 2021 to provide direct feedback on the Company's Wildfire Mitigation Plan, PSPS Playbook, Community Resource Center Playbook and Access and Functional Needs Plan. The Board consists of public safety partners, local government representatives, tribal officials, community-based organizations and a representative from the AFN community. See Appendix A for a list of Board members in 2024. Recommendations from the Board inform improvements to the PSPS program.

The Board met in March of 2024, pre-wildfire season, and November of 2024, post-wildfire season. Topics of discussion included systemwide improvements, PSPS history and risk, review of the previous fire season and preparation for the upcoming fire season, the PSPS program, organizational updates, and customer program updates. During the March 2024 meeting, the Board reviewed and provided feedback on updates to the PSPS Playbook and the Emergency Response Plan. Recommendations made by the Board at the November 2024 meeting informed the AFN outreach priorities for 2025; strategies to engage a wider range of local organizations and AFN perspectives on the Board; and priority topics for 2025 meetings including increased engagement with Tribal nations and the Company's efforts to minimize outages. In 2025, PacifiCorp will continue to seek broader perspectives and AFN representation on the Board.

AFN Program Manager

In 2024, PacifiCorp created and staffed an Access and Functional Needs program Manager role that resides within the emergency management team and oversees the development of an integrated access and functional needs program. The AFN program manager participated in the 2024 Statewide AFN Joint IOU meetings and the 2025 AFN Plan Working Group. Additionally, in 2024, PacifiCorp initiated monthly AFN coordination meetings with the California Small and Multi-Jurisdictional Utilities (SMJUs). In 2025, the AFN Program Manager will continue review of existing AFN programs to identify areas for improvement; convene the Wildfire Advisory Board; continue to engage with the Joint IOUs and SMJUs; and seek opportunities to expand relationships and outreach with CBOs, healthcare organizations and other AFN service providers.

AFN Public Education and Outreach

PacifiCorp provides additional PSPS notifications to individuals who have self-identified as having an access or functional need, including medical and medical baseline customers. Having key messages across several communications channels and materials asking AFN customers to self-identify with the company is a vital component to the Company's community engagement and customer outreach strategy.

PacifiCorp has engaged a vendor to survey customers to help inform the Company's communication and education plan, including a strategy which can be tailored for AFN customer outreach and engagement. This includes assessing the need and type of communication channels for people with AFN who may not be able to use standard forms of communication. Survey data has informed the overall outreach strategy, and the company has adjusted and expanded where key messages are disseminated to increase AFN self-identification.

PacifiCorp will continue to provide information about the PSPS notification process, how to prepare for outages, the Company's backup power programs and benefits of AFN self-identification. In 2025, PacifiCorp's AFN outreach efforts will focus on amplifying messaging about AFN program offerings and removing barriers to accessing the Company's AFN programs, with the ultimate goal of increasing the number of customers who self-identify as being electricity dependent or having an AFN. Outreach tactics under consideration have been informed by customer survey findings, partner interviews, Wildfire Advisory Board feedback, and direct feedback from CBOs and other AFN service providers. Upon completion, new and updated materials will be distributed through CBOs, other AFN service providers and public safety partners.

PacifiCorp’s PSPS AFN outreach plan for 2025 is shown in Table 3 below.

Table 3. 2025 AFN PPS Outreach Tactics and Initiatives

Outreach tactic	2025 initiatives
Wildfire Advisory Board	<p>PacifiCorp will continue to convene the Board to share PPS information and to seek guidance on local outreach opportunities.</p> <p><u>New:</u> PacifiCorp will seek additional members to join the Board, with a focus on a wider range of service providers for AFN communities and AFN representation.</p>
AFN Programs Toolkit	<p><u>New:</u> PacifiCorp will develop an AFN programs toolkit for external partners, including flyers and copy for partner websites and social media.</p>
Website	<p>PacifiCorp will continue to maintain the Company’s PPS websites.</p> <p><u>New:</u> PacifiCorp will review the Company’s website related to programs and offerings supporting AFN customers, for opportunities to enhance accessibility and ease of use.</p> <p><u>New:</u> PacifiCorp will develop a one-stop-shop webpage for AFN customers to easily access information and programs.</p>
Social media	<p>PacifiCorp will continue to post content to social media sites and attempt to provide information in English and Spanish during a PPS.</p>
Tribal Engagement	<p>PacifiCorp will continue to coordinate with Tribal partners on engagement opportunities.</p> <p><u>New:</u> PacifiCorp will seek opportunities to post information about wildfire safety and PPS in Tribal publications, including information about AFN programs.</p>
Collateral	<p>PacifiCorp will continue to publish and distribute PPS informational brochures.</p> <p><u>New:</u> PacifiCorp will develop a simplified AFN program flyer in English and Spanish.</p>
Customer E-mail	<p>Before wildfire season, PacifiCorp will continue to e-mail PPS information to all customers.</p> <p><u>New:</u> PacifiCorp will conduct a targeted e-mail campaign to AFN customers about available programs prior to wildfire season.</p>
Bill messages	<p>Before and during wildfire season, PacifiCorp will continue to send on-bill messages about wildfire safety and preparedness.</p>

Accessible Communications

Pre-fire season, PacifiCorp enhances online customer communications through the website, customer notification emails, social media, wildfire webinars and in partnership with community-based organizations, Tribal Authorities, local governments, regional centers and other service providers to amplify reach to customers. PacifiCorp's website provides digital brochures and handouts on the Company's backup power programs, wildfire preparedness, and the medical baseline program.

In 2024, PacifiCorp hired a new Wildfire Mitigation Communications Program Manager. This position plays a pivotal role in ensuring PSPS, wildfire mitigation and wildfire response information is accessible. In March 2023, PacifiCorp added an online Medical Certification form in Spanish to its website to enhance ease of communication for customers. As of July 2024, PacifiCorp's Spanish wildfire page content mirrors that of the website's English content, offering a one-to-one certified translation. Handouts about medical programs are available digitally in English, Spanish and Hmong, and in hard copy in English and Spanish.

PacifiCorp's customer service agents have access to and training with wildfire safety, preparedness and PSPS-related communications and can facilitate a conversation between the customer and translation service to ensure customers can receive wildfire safety and preparedness and PSPS-related information they need. Information about AFN programs is available through customer service in over 300 languages including Chinese traditional, Chinese simplified, Tagalog, Vietnamese, Mixteco, Zapoteco, Hmong, German, and Spanish.

In 2025, the Company will review and update online messaging about AFN programs to promote accessibility and ease of use. A new one-stop-shop webpage for AFN related programs will be developed to provide easier online navigation for customers. Additional webpages and collateral will be translated.

Tribal Engagement

A significant portion of the Karuk Tribe's offices and lands are in a high fire consequence area of Siskiyou County. Representatives from the Tribe are invited to participate and are standing members in the PacifiCorp Wildfire Advisory Board. PacifiCorp's regional business manager conducts regular calls with the Tribe's leadership to quickly address any issues as they arise and to discuss PacifiCorp's operations in the area including wildfire mitigation and PSPS.

In 2023, the Company hired a Tribal Liaison Representative who provides internal guidance and support to staff who work with Tribes or are seeking partnership with Tribes in PacifiCorp service territories. The Tribal Liaison also supports understanding of cultural needs and protocols for Indigenous customers who have indicated that have an AFN.

As part of the Company's efforts to hear from a variety of stakeholders and partners, PacifiCorp interviewed a representative from the Karuk Community Center in 2021 and the Karuk Tribe's Emergency Manager in 2023 during the semi-annual survey. In 2024, PacifiCorp interviewed members of the Tolowa Dee-ni' Nation - Smith River Tribe for additional Tribal perspectives on the Company's PSPS program. See the *CBO and Partner Interviews* section below and Appendix D for more information.

In coordination with the Company's Tribal Liaison Representative, PacifiCorp will continue to foster relationships with Tribal leaders and staff and explore additional collaboration opportunities with the Karuk and Yurok Tribes who have served on the Wildfire Advisory Board. Additionally, PacifiCorp will work to extend our outreach with some of the other Tribes and Rancherias in the Company's service territory in California.

CBO Outreach

PacifiCorp coordinates with community-based organizations, healthcare organizations and other AFN service providers to amplify messaging about the Company's AFN programs via partner websites, social media and flyer distribution at outreach events, and direct distribution from case worker to client. In 2024, PacifiCorp developed copy in English and Spanish for external partners to post on their websites and social media.

PacifiCorp partners with Great Northern Services in Weed, the Karuk Tribe Community Center in Happy Camp, the Redwood Coast Regional Center and Far Northern Regional Center in addition to coordinating with the 23 Wildfire Advisory Board members (identified in Appendix A of this report) on outreach opportunities.

Between July and December 2024, PacifiCorp conducted targeted outreach to the following organizations:

- Del Norte County Health and Human Services
- Del Norte County Communications and Equity
- Del Norte and Tribal Lands (DNATL) Community Food Council
- Family Resource Center of the Redwoods
- Siskiyou County Health and Human Services
- Siskiyou County Health Care Coalition
 - Fairchild and Mercy Medical Centers
 - Sierra – Sacramento Valley Regional Disaster Medical Health System
 - State & Local Public Health
 - Siskiyou County Environmental Health, Behavioral Health, Office of Education
 - Trinity County Health Care Coalition
 - Planning and Service Area 2 Agency on Aging (Modoc, Shasta, Siskiyou)
 - NorCal Continuum of Care/Homeless Coalition (Modoc, Shasta, Siskiyou, Del Norte)
 - Mt. Shasta
 - State & Local OES
 - EMS Providers
 - Fire Chief’s Association
- Tri-County Independent Living
- 2-1-1 NorCal

The Company is seeking additional messaging avenues outside of its currently defined outreach strategy. This involves working with community partners to find appropriate places and spaces to add AFN-specific messages to existing platforms such as CBO emails, webpages and/or social media pages. This work is ongoing and is carried out by the Company’s regional business managers who collaborate closely with their community stakeholders and through direct outreach to community organizations by, the Access and Functional Needs Program Manager and emergency management personnel. When AFN outreach materials are updated in 2025, PacifiCorp will coordinate with these organizations to share the information with their communities.

Customer Surveys

In 2024, PacifiCorp conducted two annual surveys, one pre- and one post-fire season. MDC Research has been contracted to collect data from customers and to conduct interviews with CBOs and other community partners. The goal is to evaluate the impact of the Company's communication campaigns, receive direct feedback from community partners on outreach, support, and process improvements, and to collect demographic information about our customers. In March and November 2024, a total of 1,170 surveys were completed: 1,010 web and 160 phone. A comprehensive report on the Company's 2024 survey results is located in Appendix D. Findings from the 2024 research will inform PacifiCorp's messaging and outreach initiatives in 2025, including, but not limited to: amplifying messaging about the Company's AFN programs; translating additional AFN program materials into Spanish; and enhanced coordination with local CBOs and other AFN partners. In 2025, PacifiCorp will review the survey for areas of improvement specific to AFN customer needs.

CBO and Partner Interviews

MDC Research also conducted in-depth interviews with CBOs and other partners in PacifiCorp's California service area in March and November 2024. Partners included the Tolowa Dee-ni' Nation- Smith River Tribe, Family Resource Center of the Redwoods, Siskiyou Fairgrounds, Del Norte County Office of Emergency Management, and the Yreka Area Fire Safe Council. The interviews lasted 30 minutes and were conducted virtually. Findings from the 2024 partner interviews will inform PacifiCorp's outreach tactics in 2025.

2.2 PSPS Activation (During – Emergency Coordination Center activation)

2.2.1 PSPS Communications

All Customers

PacifiCorp's Public Safety Power Shutoff event communication and notification plan has two primary systems. First, direct communications, through pre-identified channels are used to provide detailed notices to key stakeholders, namely public safety partners and critical facilities and critical infrastructure. Second, a series of automated notices (e-mail, text, and direct phone calls) to customers, together with published information on the Company's website, social media channels, and proactive media outreach, are employed to provide notice to the public at the primary stages of the PSPS process, including at a minimum for pre-activation, activation and re-energization. The communication and notification plan are exercised annually, as part of the PSPS tabletop and functional exercises, and refined as appropriate.

AFN Customers

When a PSPS event is forecasted, a list of impacted customers is extracted from the Customer Service System where AFN customers are identified, and customer service staff attempt to make personal phone calls to each customer. To the extent possible, PacifiCorp sectionalizes circuits into smaller zones for de-energization in order to minimize customer impacts, and subsequently, the number of AFN customers de-energized. This approach helps PacifiCorp to personally reach out to AFN customers. Contact occurs prior to an event, at the beginning of re-energization, and after energization is completed. Customer service tracks if a positive confirmation of contact was made with medical baseline (MBL) and AFN customers. The results of the contact are reported to the ECC Executive.

If an AFN customer needs additional assistance, the AFN Coordinator coordinates with customer service, the ECC Joint Information Team and the ECC Liaison to quickly relay the information to local public safety partners. Such coordination may lead to a wellness check.

2.2.2 Website

To ensure that the public can access timely and detailed information about both potential and actual PSPS events relevant to a particular location, PacifiCorp has modified its main PSPS webpage, available at www.pacificpower.net/psps. The web-based tool allows members of the public to enter an address into a search bar to determine in real-time, if that address is in an area which may be subject to a PSPS.

An additional online tool is available for members of the public to see the “Public safety power shutoff forecasting” for that area over the following week. The status indicates and defines whether the area is operating as “Normal,” whether there is a PSPS “Watch,” or whether there is an actual PSPS “Event.”

PacifiCorp’s Weather Awareness Websites received numerous enhancements in 2024 in order to meet two goals for both customers and PacifiCorp’s operations and leadership teams: to better serve as a weather-related decision-support platform, and to better deliver local weather information. These improvements include the ability for PacifiCorp’s meteorology team to access additional fire metrics at a more granular level. Additional mapping tools and weather variables were added to increase forecasting data and situational awareness ability across the service territory. PacifiCorp’s website performed well during the September 2020 windstorm event where a significant surge in website visits enabled +/- 200,000 visitors and more than 1.6 million web page views. This event demonstrated capable broadband performance.

2.2.3 Public Safety Partner Portal

PacifiCorp has developed a Public Safety Partner Portal, a secure web-based application that hosts information about customers identified as critical facilities or infrastructure. Key information includes location, primary/secondary contact information, backup generation capabilities and more. The portal is accessible to approved partners during PSPS events to increase transparency, consistent information-sharing and overall awareness of potentially affected facilities. Public safety partners with access include emergency responders from federal, state, local and tribal governments, telecommunication providers, water agencies, public-owned utilities, emergency hospitals, and transportation agencies. The portal also helps PacifiCorp prioritize restoration, backup power evaluation, additional communications, and other resources before and during PSPS events to critical facility customers who provide services essential to public safety. PacifiCorp is working on an updated version of the Public Safety Partner Portal which will be released in 2025.

2.2.4 PSPS Customer Notifications

Multiple communication channels are used for customer notifications, including:

- Outbound calls
- Social media updates
- Texts and emails
- Website update
- Press release
- Personal phone calls to AFN customers

Table 4 shows the PSPS notification plan for customers with AFN.¹²

Table 4. PacifiCorp’s PSPS AFN Notification Plan

AFN Population Type	PSPS Notification Plan
Medical certificate	Standard PSPS notification via all available channels; plus additional PSPS notifications via personal phone calls; and in person welfare check if unable to reach via phone
Medical certificate with life support	Standard PSPS notification via all available channels; plus additional PSPS notifications via personal phone calls; and in person welfare check if unable to reach via phone
Medical baseline	Standard PSPS notification via all available channels; plus additional PSPS notifications via personal phone calls; and in person welfare check if unable to reach via phone
Access and functional needs, self-identified	Standard PSPS notification via all available channels; plus additional PSPS notifications via personal phone calls; and in person welfare check if unable to reach via phone
Limited English proficiency	Standard PSPS notification via all available channels
Tribes	Standard PSPS notification via all available channels; and media releases, social media, website; and Pacific Power's tribal liaison, emergency management personnel, public safety partners, ESF12, and/or regional business managers
People in remote areas	Standard PSPS notification via all available channels; and media releases, social media, website
Priority essential service organizations, including CBOs and critical facilities that serve AFN populations	Notifications via emergency management personnel, public safety partners, ESF12, and/or regional business managers; and via the public safety partner portal

¹² As found in the updated Table 13 – AFN Population Subset Notification Plan, location in R.18.12.005 PacifiCorp’s 2024 PSPS Pre-Season Report available at https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/outages-safety/wildfire-safety/california-reports/R.18-12-005_PacifiCorp_2024_PSPS_Pre-Season_Report_PUBLIC_12-20-24.pdf

2.2.5 Community Resource Centers

Community resource centers (CRCs) are an integral part of ensuring community members affected by PSPS events have access to basic resources and up-to-date information. During a PSPS event, PacifiCorp closely coordinates with local public safety partners to determine CRC needs and locations. CRC locations are vetted using a checklist that was developed following guidance identified from the California Public Utilities Commission decisions and the current Americans with Disabilities Act Checklist for Emergency Shelters to ensure CRC services are equitable and accessible for medical baseline and access and functional needs populations.

PacifiCorp emergency management meets regularly with local and regional organizations that provide services to the AFN community, local emergency managers, and other support groups to ensure AFN and medical baseline needs are identified at CRCs, and that CRC resources are equitably distributed and accessible. When activated, the CRCs will be listed on the company’s public website.

Services/resources provided at CRCs include:

<ul style="list-style-type: none"> ✓ Shelter from environment ✓ Air conditioning ✓ Air Purifiers & Air Quality Monitors ✓ Potable water & non-perishable snacks ✓ Seating and tables ✓ Restroom facilities ✓ Refrigeration & heating for medicine and/or baby needs ✓ Interior and area lighting ✓ On-site security ✓ Televisions 	<ul style="list-style-type: none"> ✓ Ice and water ✓ Communications capability such as Wi-fi access, satellite phone, radio, cellular phone etc. ✓ On-site medical support (EMT-A at a minimum, paramedic preferred) ✓ Charging stations for cell phones, AM/FM/weather radios, computers, etc. ✓ Small crates for pets ✓ AFN/LEP population support ✓ Personal Protective Equipment ✓ Portable ADA ramp
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PacifiCorp will continue to gather feedback from customers who utilize CRCs, logistics staff, the public utility commission and PacifiCorp employees in order to optimize CRC messaging, accessibility, support for medical and essential devices and the unmet needs of all customers including those who identify as AFN. Feedback is also gathered via printed surveys that are onsite at the CRC, online, and through customer service. Areas for improvement gathered via these feedback channels and through after-action reports will inform the next CRC Playbook update, scheduled for April 2025.

2.3 Recovery (After – Power has been restored)

2.3.1 AFN Support

AFN customers are contacted by customer service after the power is restored, as a continuation of the ongoing contact prior and throughout a PSPS event. The check-in ensures no additional support is needed for the customer after the power is restored.

Unmet AFN needs identified during post-re-energization wellness checks are escalated to the ECC. The AFN Coordinator or ECC Liaison would then coordinate with the local EOC to identify local resources to support the customer.

2.3.2 After Action Reviews and Reports

As with any other incident or event, after action reports are completed for PSPS responses. These reports provide an opportunity to identify what went well during the event execution and where improvements are needed. These findings are incorporated into future procedural improvements and as available, provided in the California Public Utility Commission post-event report in compliance with Resolution ESRB-8.

2.3.3 Lessons Learned and Feedback

PacifiCorp uses all events and incidents to gain feedback and identify future opportunities for improvement. As a part of the Company's internal improvement cycle the feedback and identified improvement opportunities are key measurements PacifiCorp uses to make corrections and adjust plans. Bi-annual customer surveys, CBO and partner interviews and ongoing reporting provide routine feedback and measurement of PacifiCorp's performance before, during, and after an event.

3. INFORMATION COLLECTION, ANALYSIS AND DISSEMINATION

PacifiCorp has contracts with three CBOs in California to share customer information. The information transfer is protected and is used to assist with CARE program Post Enrollment Verification (PEV), weatherization program, and receipt of energy assistance benefits. Additionally, the Company has an agreement with the State of California Department of Community Services and Development (CSD) for the Low-Income Home Energy Assistance Program. The agreement entitles agencies to customer information in PacifiCorp's Energy Assistance Portal to allow them to carry out provisions of LIHEAP (Low Income Home Energy Assistance Program). No other agreements for customer information sharing exist with local agencies, government agencies, or health providers.

4. AUTHORITIES AND REFERENCES

4.1 Annual Report and Emergency Response Plan in Compliance with General Order 166

PacifiCorp's Emergency Response Plan is updated annually and was last published in April 2024. All updates are in compliance with GO 166.

4.2 Phase 3 OIR PSPS Guidelines: AFN Plan and Quarterly Updates

Each IOU's annual AFN Plan and quarterly updates must incorporate, at a minimum, the six steps outlined in the Federal Emergency Management Administration's Comprehensive Preparedness Guide.

As PacifiCorp implements the 2025 AFN Plan, quarterly updates will be provided to the California Public Utility Commission. Revisions will be tracked each time the plan is modified and include descriptions, locations and date of the revisions made, and names of the persons responsible for the revisions.

5. CHANGE RECORD

Section	Person Responsible for Revision	Change	Date
Various	Various PacifiCorp Personnel	Various updates to align with 2024 Joint IOU AFN Plan and updates regarding AFN customer counts, survey results, website enhancements.	January 31, 2024
All	Various PacifiCorp Personnel	<p><u>Updated</u></p> <ul style="list-style-type: none"> • Significant updates in Section 1 to align with the Joint IOU’s 2025 AFN Plan template • Tables and map • Content, order and flow of all sections of the Concept of Operations • Survey and interview findings located in Appendix D <p><u>Added</u></p> <ul style="list-style-type: none"> • Areas of focus in 2025 within the Concept of Operations • Customer Assistance Programs • Table 3. 2025 PSPS AFN Outreach Tactics and Initiatives • Table 4. PacifiCorp’s PSPS AFN Notification Plan • New positions and responsibilities • Required training for ECC personnel • PacifiCorp’s Wildfire Advisory Board roster to Appendix A which includes other AFN advisory groups 	January 31, 2025