

**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)

**2024 ANNUAL ACCESS AND FUNCTIONAL NEEDS PLAN  
OF PACIFICORP (U 901 E)**

Dated: January 31, 2024

Tim Clark  
Assistant General Counsel  
PacifiCorp d/b/a Pacific Power  
1407 W. North Temple, Suite 320  
Salt Lake City, Utah 84119  
Telephone: 801-220-4565  
Email: [tim.clark@pacificorp.com](mailto:tim.clark@pacificorp.com)

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**2024 ANNUAL ACCESS AND FUNCTIONAL NEEDS PLAN  
OF PACIFICORP (U 901 E)**

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.) 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, 2024

Respectfully submitted,

/s/

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Tim Clark  
Assistant General Counsel  
PacifiCorp d/b/a Pacific Power  
1407 W. North Temple, Suite 320  
Salt Lake City, Utah 84119  
Telephone: 801-220-4565  
Email: [tim.clark@pacificorp.com](mailto:tim.clark@pacificorp.com)

## ATTACHMENT A

**PacifiCorp**

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

**January 31, 2024**



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<sup>1</sup> <https://www.cpuc.ca.gov/regulatory-services/safety/electric-safety-and-reliability-branch/electric-and-cip-audits-introduction/electric-facilities-safety-audit-report-archive/go-166-annual-reports>

## EXECUTIVE SUMMARY

PacifiCorp's Wildfire Mitigation Plan (WMP) is a comprehensive plan to mitigate the risk of wildfires on our communities. In addition to system hardening, vegetation management, and weather station monitoring, the WMP includes Public Safety Power Shutoffs (PSPS) as a measure of last resort as necessary to protect our customers and communities when wildfire risk is high. PacifiCorp was fortunate to participate in the Investor-owned Utility (IOU)'s development of their 2023 and 2024 Plans to support individuals with Access and Functional Needs (AFN) during PSPS events. Since 2021, PacifiCorp representatives have been attending and monitoring the AFN Statewide Council and AFN Collaborative Planning team to glean insight from the IOUs' AFN and statewide AFN stakeholders from a broad-spectrum of expertise. Due to the comparably small size of PacifiCorp's service territory, limited resources, and the number of AFN customers, PacifiCorp incorporated universal portions of the Joint IOUs' plan and modified other portions to match the size and scope of our service territory. The Introduction and Section 1 of this report represent the work of PacifiCorp with the AFN Core Planning Team with slight modifications.

Starting with the 2024 Plan, PacifiCorp leveraged the Federal Emergency Management Administration's (FEMA) Comprehensive Preparedness Guide 101, 6-Step Process as developed through the statewide process and required in Decision (D.) 21-06-034, which adopted Phase 3 revised and additional guidelines for PSPS to mitigate risk caused by utility infrastructure. Quarterly reports will continue to be filed to monitor progress and provide routine updates.

The main risk identified through collaboration with AFN stakeholders that this plan is intended to mitigate is: *"Individuals with AFN are unable to use power for devices/equipment for health, safety, and independence due to an unexpected PSPS or are unprepared for a PSPS."* PacifiCorp followed the same outline as identified with the statewide AFN Collaborative Planning Team to address "Who," "Why," "What," and "How" to support individuals with AFN and mitigate risks associated with PSPS events.

### WHY

As climate conditions change, wildfires have become a year-round threat. When wildfire conditions present a safety risk to our customers and communities, electric utilities may call for a Public Safety Power Shutoff (PSPS) as a measure of last resort.

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. This Plan mitigates the impact of PSPS on individuals with AFN.

## WHO

The Joint IOU Statewide AFN Advisory Council<sup>2</sup> and AFN Core Planning Team developed a definition of Electricity Dependent individuals<sup>3</sup> 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 Public Safety Power Shutoff for reasons including, but not limited to:

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

PacifiCorp has made progress in identifying individuals with AFN across our service areas, identifying over thirteen thousand five hundred customers through defining, mapping, enabling, and promoting self-identification. PacifiCorp continues these efforts to identify additional individuals with AFN through 2024.

## WHAT & HOW

Working alongside the AFN Collaborative Council and AFN Core Planning Team, the IOUs have worked to identify the goals, objectives, and potential opportunities for enhancements in 2024. 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.

## INTRODUCTION

PacifiCorp along with the other IOUs continually monitors weather and other climate conditions to detect fire conditions. PSPS de-energization activations disrupt the everyday lives of individuals impacted. This 2024 Plan focuses primarily on individuals and communities with Access and Functional Needs, as they may be disproportionately impacted by PSPS activations. The plan was developed incorporating elements from the AFN Core Planning Team comprised of leaders in the AFN community and the utilities.

Leveraging the Federal Emergency Management Administration's (FEMA) Comprehensive Preparedness Guide 101, 6 Step Process, Decision (D.) 21-06-034 Phase 3 OIR Decision Guidelines, PacifiCorp worked collaboratively with Joint IOUs to engage a "Whole Community approach" to develop an overarching Joint IOU Statewide template to meet the diverse needs of

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<sup>2</sup> Please see Appendix A for a list of the members of the Joint IOU Statewide AFN Advisory Council (Core Planning Team and Collaborative Partners).

<sup>3</sup> 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. See e.g., D.21-06-034, pp. A8 – A9; D.20-05-051, p. A8; D.19-05-042, pp. A12-A14, A20-A21. The IOUs will continue to collaborate with AFN stakeholders to refine this definition as appropriate.



the individuals with AFN. PacifiCorp participated in the AFN Core Planning Team with the intention to apply applicable sections of a statewide template to the Company’s 2024 Plan, develop greater understanding of the statewide Council’s most critical areas of concern, identify best practices, and participate in the team’s efforts to identify the maximum number of AFN customers in our communities.

This plan is focused on PacifiCorp’s approach for serving individuals with AFN leading up to, during, and after PSPS events.

**Subject Matter Experts**

PacifiCorp engaged regional and statewide AFN stakeholders with a broad-spectrum of expertise for the development of this plan in alignment with Step 1 of the FEMA Process:

*FEMA Step 1: Engaging the Whole Community in 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 August 16, 2023, 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 Team members on September 14, 2023. The 2024 AFN Core Planning Team comprises 13 organizations representing the diverse needs of the AFN community. The table below reflects the organizations involved in the development of the 2024 AFN Plan.

<b>Joint IOUs</b>	San Diego Gas & Electric
	Southern California Edison (SCE)
	Pacific Gas & Electric (PG&E)
<b>AFN Collaborative Council (per the Phase 3 OIR PSPS Decision):</b>	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)
<b>AFN Core Planning Team</b>	California Council of the Blind (CCB)
	California Department of Developmental Services (DDS)
	Deaf Link, Inc.
	California Department of Rehabilitation (DOR)
	Disability Policy Consultant
	Liberty Utilities
	Redwood Coast Regional Center (RCRC)
	Service Center for Independent Living (SCIL)
State Council on Developmental Disabilities (SCDD)	

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<sup>4</sup> 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 a sounding board and offer insight, feedback, and input on the IOUs' customer 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.

The planning process the Joint AFN plan presented provides opportunities to collect feedback and implement strategic improvements with details included in specific IOU plans. We continue to look at expansion of program offerings, refresh the Joint IOU statewide PSPS Preparedness website, [www.PrepareForPowerDown.com](http://www.PrepareForPowerDown.com), conduct outreach and education, as well as expand access to eligible populations.

#### Wildfire Advisory Councils

PacifiCorp established a Wildfire Advisory Board to provide direct feedback on Wildfire Mitigation Plans and PSPS Plans. The board consists of public safety partners, local government representatives, tribal officials, and a representative from the AFN community. Based on recommendations from the Wildfire Advisory Board, PacifiCorp is working with transportation providers to secure transportation for AFN customers to access Community Resources Centers (CRCs) during PSPS events. Secondly, PacifiCorp provides education and outreach to city and county board and commissions regarding PSPS events to further education. The Council met in April of 2023, pre-wildfire season, and November of 2023, post-wildfire season. The topics of discussion included service territory overview, the PSPS program, organizational updates, and customer program updates. PacifiCorp will continue to work with the board to schedule meetings, determine meeting frequency and request topics of interest in early 2024.

#### Community Based Organizations

PacifiCorp will continue to engage and solicit feedback from a variety of CBOs which also serve our customers. Additional information on the company's efforts with CBO partners is covered in later parts of this Plan.

## 1. PURPOSE, SCOPE, SITUATION OVERVIEW, AND ASSUMPTIONS

### 1.1 Purpose/Background

PacifiCorp understands that PSPS events disrupt the everyday lives of all individuals impacted during a PSPS event. The following 2024 AFN PSPS Plan focuses on mitigating the impacts of PSPS for individuals and communities with AFN, as PSPS may significantly impact these

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<sup>4</sup> These working groups convene at least quarterly to share lessons between the impacted communities and the IOUs per D.20-05-051.

individuals more than the non-AFN populations. This plan was developed jointly with the AFN Core Planning Team comprising leaders in the AFN community and the utilities.

2024 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 Scope

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 speakers, 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.”<sup>5</sup>

Recognizing this is an extremely broad audience, this plan focuses on minimizing the impact of a PSPS on electricity dependent individuals (as defined on page 5 above) with AFN. To understand these impacts, the Joint IOU AFN Advisory Council developed a preliminary understanding of the term “electricity dependent.” This preliminary definition is intended to help inform new/enhancements to the programs and resources available (see section 1.3 below.)

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:

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<sup>5</sup> D. 19-05-042.

- 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, in home chair lift, electric beds
- Communication:
  - Augmentative communication devices (e.g., tablets, wearables, eye gaze), alert systems
  - Powered equipment for hearing or vision support

### 1.3 Situation Overview

#### 1.3.1 Hazard Analysis Summary – Definition of Risk

*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.*

“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.

This Plan mitigates the key risk of PSPS identified by the Core Planning Team:

- 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 the impacts of PSPS are dynamic and are committed to supporting customers before, during and after a PSPS.

#### 1.3.2 AFN Population and Identification

PacifiCorp continues to seek improvements to identifying the electricity dependent customers with AFN through defining, mapping, and enabling self-identification, and has mapped their respective databases to flag customers as “AFN.”

PacifiCorp identifies the following customers as AFN:

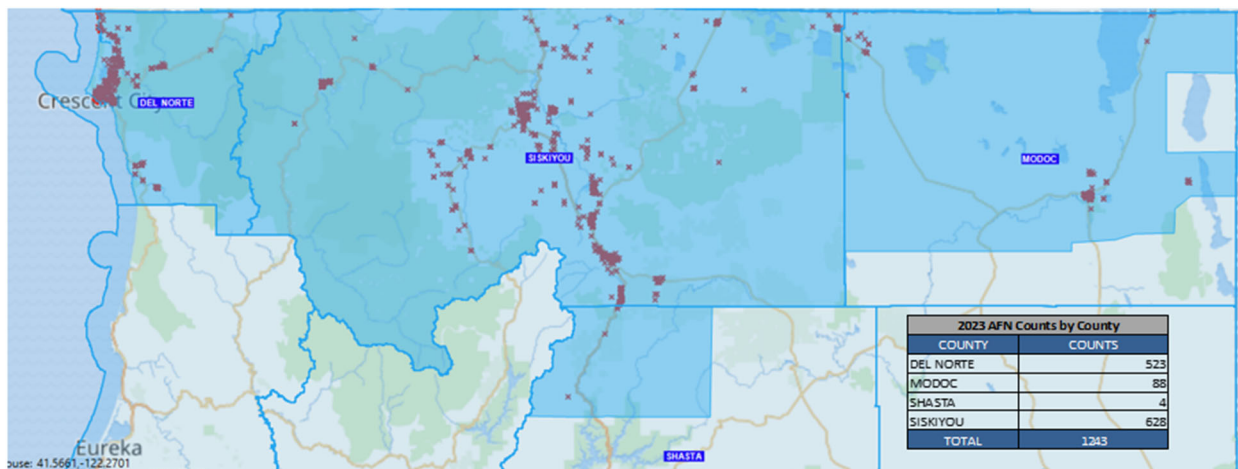
- Customers enrolled in the following programs:
  - Medical Certification
  - Medical Baseline (MBL)<sup>6</sup>, including Life-Support (Critical Care)
- Customers who self-certify or self-identify

Our Customer Service representatives are trained to notice key words/phrases during phone conversations, which triggers them to ensure the customer is already set up as an AFN, or to let the customer know about PSPS preparedness and our AFN status to see if it is something that they might need or be interested in for anyone in their household.

PacifiCorp expanded its AFN identified customers by adding the option to self-identify on its California Alternate Rates for Energy (CARE) applications, discussed further in section 2.1.1 below.

The map below generally identifies the 781 AFN customers throughout The Company's service territory at the county level. While PacifiCorp has historically focused preparation efforts in Tier 3 locations, the company is now expanding its preparedness and looks to identify AFN populations across the entire service territory. In 2024, PacifiCorp will continue identifying individuals who are electricity dependent beyond those enrolled in the Medical Baseline Allowance Program, through direct outreach to customers.

### Service Area with AFN Customers



### 1.3.3 Capability Assessment and Surveys

*FEMA Step 3: Operational priorities.*

*Specifying what the responding organizations are to accomplish to achieve a desired end-state for the operation.*

<sup>6</sup> Per D. 21-06-034, identification efforts include also “persons reliant on electricity to maintain necessary life functions including for durable medical equipment as assistive technology”. Id at pp. A8-A9.

Resources		PacifiCorp
<b>Community Resource Centers</b>	Wi-fi, ADA-accessible restroom, bottled water, snacks, charging, chairs, ice, event information & area/weather items	<b>X</b>
<b>Power Resiliency</b>	Portable backup batteries for Medical Baseline customers	<b>X</b>
	Generator Rebate Program	<b>X</b>
<b>Food Replacement</b>	Food Bank Partnerships	
	Meals on Wheels	
	Community Resource Center – Hot meals	
	Grocery Gift Cards	
	Food delivery	
<b>Transportation</b>		
<b>Lodging</b>		
<b>IOU Customer Communications</b>	Annual Preparedness Outreach	<b>X</b>
	In Language Materials	<b>X</b>
	Accessible Materials	<b>X</b>
	CBO Partners	<b>X</b>
<b>Training</b>	General Information	<b>X</b>
	Tabletop exercises and full-scale exercises	<b>X</b>
<b>Community Engagement</b>	IOU hosted events, Webinars, Advisory Boards, Working Groups	<b>X</b>
<b>PSPS Notifications</b>	Account Holders	<b>X</b>
	Non-Account Holders (PG&E/SDG&E Address; SCE Zip Code)	<b>X</b>
	Broad: via multicultural media, CBOs, and social media	<b>X</b>
<b>Notification Confirmation (Phone retries &amp; in person doorbell rings)</b>	Life Support/Critical Care	<b>X</b>
	Medical Baseline	<b>X</b>
	Self-Certified Vulnerable Customer Status	<b>X</b>

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.

Pacific Power will continue our commitment to mitigating impacts of PSPS by focusing on key objectives identified through the 2024 planning meetings:<sup>7</sup>

- Provide overall preparedness resources for individuals with AFN regardless of

<sup>7</sup> See Appendix C for continued efforts from key objectives identified in 2022 and 2023 planning meetings.

emergency type

- Increase awareness of IOU programs and services available before, during, and after a PSPS activation
- Implement tracking and metrics for escalations, programs and services offered and utilized by conducting surveys, table-top exercises, etc.
- Ensure customers with sensory disabilities can provide feedback, understand, and successfully operate the provided equipment.

Additional Key Objectives identified for 2024:

- Provide overall preparedness resources for individuals with AFN regardless of emergency type
- Increase awareness of IOU programs and services available before, during and after a PSPS

*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.*

- PacifiCorp has worked to deliver consistent services and resource offerings
- Proposed recommendations to meet the Key Objectives for 2024:
- Increase awareness of our programs and services available before, during and after a PSPS
- Increase more awareness through council members via presentations/materials
- Engage with CBOs to identify opportunities for additional PSPS messaging
- Identify individuals who are Electricity Dependent
- Collaborate with the Statewide Medical Baseline Study to identify potential outreach opportunities
- Continue to expand marketing and CBO opportunities for individuals to self-identify as AFN or vulnerable
- Identify new enhancements to programs and resources needed to mitigate the impacts of PSPS
- Solicit feedback from CBO partners
- Coordinate and integrate resources with state, community, utility to minimize duplication
- Obtain list of support service from the council members that are provided to their constituents before, during, and after a PSPS

Objectives:	Current State with Enhancement:
Identification of individuals who are electricity dependent	<ul style="list-style-type: none"> <li>• Collaborate with State and Community Based Organizations (CBOs) to leverage the common definition and identify targeted outreach opportunities</li> <li>• Continue to deploy and expand strategies to enhance identification of individuals with AFN:               <ul style="list-style-type: none"> <li>○ Partner with state agencies, hospital associations, healthcare providers, and CBOs to identify targeted audiences</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Marketing to promote beneficial programs like Medical Baseline and CARE to reach individuals with AFN</li> <li>○ Marketing and outreach to encourage customers to self-identify as individuals with AFN</li> <li>○ Continue to promote the ability for customers to “self-certify/identify” as individuals with AFN/Vulnerable Customer status across new channels including websites</li> </ul>
Establish communication plan that reaches all AFN segments	<ul style="list-style-type: none"> <li>● Provide communications in prevalent languages and preferred formats, including ASL communications (e.g., notifications, programs, and resources information)</li> <li>● Partnering with state agencies, hospital associations, healthcare providers, durable medical equipment companies, multifamily dwellings, paratransit companies, and community-based organizations to further promote assistance programs</li> </ul>
Support AFN customers during a PSPS Event	<ul style="list-style-type: none"> <li>● Community Resource Centers staffed with emergency medical personnel and other services.</li> <li>● Call each AFN customer prior to an event, during an event, and after event to ensure the safety of the individual.</li> <li>● Incorporate a direct feedback loop with Incident Command and local Emergency Management.</li> </ul>

## Research and Surveys

In 2023, PacifiCorp conducted two annual surveys, one pre- and one post-fire season. MDC is a research firm contracted to collect data from customers and to conduct interviews with CBOs. The goal is to evaluate the impact of the company’s communication campaigns, receive direct feedback from the CBOs on outreach, support, and process improvements, and to collect demographic information from our customers. Between November 7 and December 5 of 2023, five-hundred and forty-nine surveys were completed: 464 web and 85 phone surveys. Key findings of the survey include:

- 77% are aware of wildfire safety communications, which is higher than March 2023 (52%). Pacific Power remains the primary source for wildfire preparedness information, and personal preparedness and vegetation management remain the most common messages recalled, although mention of vegetation management is decreasing.
- Email, social media, and the Pacific Power website are the main sources for wildfire communications.
- Email, bill inserts, and radio are considered the clearest sources of information about wildfire preparedness, with the Pacific Power website considered the most useful source for information about wildfire preparedness.
- 75% have taken action to prevent wildfires or prepare their home or business for the event of a wildfire.
- 62% are aware of PacifiCorp’s efforts to prune vegetation around power lines in higher-risk areas.
- 66% recall seeing, hearing, or reading the phrase “Public Safety Power Shutoff or PSPS.”



- 77% understand the following statement about PSPS: “for areas at a higher risk of fast-spreading catastrophic wildfires, the utility will proactively shut off power during extreme and dangerous weather.”
- Two-thirds (66%) indicate seeing, hearing, or reading the phrase "Public Safety Power Shutoff or PSPS," significantly higher than in March 2023 (51%); Recallers are significantly more likely than non-Recallers to be aware of PSPS (73% vs 45%)
- Email has taken the place of TV news as the main source of PSPS communication and is mentioned at a significantly higher rate than in March 2023 (47% vs 32%); Recallers are significantly more likely than non-Recallers to mention email (50% vs 34%) and the Pacific Power website (27% vs 12%)
- Seven in ten (71%) indicate they are aware of the Low-Income Home Energy Assistance Program, followed by three fifths saying they are aware of Electrical and Wildfire Safety Information (61%), special payment arrangements, and CARE California Alternate Rates for Energy (58%)
- Please see Appendix E for more specific findings from the company’s most recent survey.

In 2024, 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 councils.

The IOUs will continue to conduct listening sessions and working groups with 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.

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.

#### 1.4 Planning Assumptions

- For PSPS, every effort is made to provide notification in advance of power shutoff
- Resources are available for individuals with AFN regardless of notification
- Effective support of individuals with AFN requires a Whole Community<sup>8</sup> (e.g., utilities, CBOs, non-profits organizations, government agencies) approach
- PSPS may occur concurrently with unrelated emergencies (e.g., active wildfires, cyber-attacks, technological hazard incidents)

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<sup>8</sup> The term “Whole Community” refers to the FEMA six step emergency planning process.

- The IOUs will continue working to create as consistent statewide response with our support services (e.g., food support, accessible transportation, Community Resource Centers, etc.) to PSPS as possible, acknowledging that there are unique needs based on geographic areas
- The scope of PSPS can increase or decrease as weather conditions are monitored across the service area

### 1.5 Success Measures and Metrics

In 2024, PacifiCorp will continue to use the Key Performance Indicators (KPIs) 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.

#### 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 utilized mitigation services reported they were satisfied with the level of support.

The IOUs will continue benchmarking to create a consistent response across the IOU service area as much as possible, recognizing that resources may not be available consistently across the state.

Please see Appendix E for more specific findings from the company's most recent wildfire customer outreach and education survey.

## 2. CONCEPT OF OPERATIONS

### 2.1 Preparedness/Readiness (Before Power Shutoff)

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

#### 2.1.1 AFN Identification Outreach

PacifiCorp continues to refine and enhance the identification of AFN customers and increase awareness for all customers. While all medical customers are identified as AFN customers, in 2023, PacifiCorp increased outreach to all customers to identify more customers relying on medical equipment and to broaden the scope of customers who self-identify as AFN. More than 16,000 customers received an email about energy assistance and the medical baseline program in December 2023, resulting in 100 visits to the medical baseline page. PacifiCorp also provided a Spanish version of the medical baseline application for customers on its website.

California Alternate Rates for Energy (CARE) applications are sent to all PacifiCorp residential customers. In 2021, PacifiCorp added a check box on the CARE application for customers to self-identify as AFN. Due to the update to the CARE applications, an additional 470 AFN customers (total) have been identified throughout the Company’s service territory which demonstrates that updates made to the Company’s CARE application have shown positive results. In 2023, PacifiCorp saw an additional 253 newly set up AFN customers identified via this the CARE application check box channel.

From the 2022 reporting period to the current reporting period (calendar year 2023), the company had an increase of 462 additional customers who identified as AFN. This represents a 59% increase in AFN customers.

#### 2023 AFN Customer Counts

PSPS De-Energization Zone	Medical Baseline AFN	Non-Medical Baseline AFN	Total
Inside	24	194	218
Outside	137	888	1,025
<b>Total</b>	161	1,082	1,243

#### 2022 AFN Customer Counts

PSPS De-Energization Zone	Medical Baseline AFN	Non-Medical Baseline AFN	Total
Inside	26	164	190
Outside	119	472	591
<b>Total</b>	145	636	781

#### Delta – 2023 - 2022 AFN Customer Count Increase

PSPS De-Energization Zone	Medical Baseline AFN	Non-Medical Baseline AFN	Total
Inside	-2	130	28
Outside	18	416	434
<b>Total</b>	16	446	462

### 2.1.2 AFN Support Resources

PacifiCorp AFN customers can access information on wildfire preparedness and programs through communication campaigns, outreach, personal contact and following when an event is forecasted on the company’s website. All customers will have access to the online webinars, events, and preparedness information to ensure that any non-identified AFN customers have an

opportunity to access resources and rebates as well as identified. PacifiCorp's AFN and wildfire support programs are identified below.

### 2.1.3 Back-Up Power

#### *Portable Battery and Backup Electric Power Rebate Program<sup>9</sup>*

PacifiCorp offers a backup electric power rebate for residential customers in its California service territory. Customers residing in the High Fire Threat Districts were eligible to claim a rebate of up to \$200 on the purchase of a backup power supply. Customers enrolled in the California Alternate Rates for Energy (CARE), Medical Certificate, or California Medical Baseline Program were eligible to claim a rebate of up to \$400. In 2023, the program was expanded to include all residential customers. Additionally, the rebate amount was increased to \$300 for residential customers and \$800 for customers enrolled in the CARE, Medical Certificate, or California Medical Baseline Program. 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, over 500 customers have received rebates.

#### *Medical Baseline Portable Battery Program*

PacifiCorp offers free portable batteries to customers enrolled in the California Alternate Rates for Energy (CARE) and California Medical Baseline Program. The program includes contracted services to include customer outreach, a backup power needs assessment, and delivery and setup of batteries. As part of delivery and setup, program participants receive individual education about proper use and maintenance of batteries, and remote technical support as needed.

Batteries were successfully delivered to qualifying registered medical baseline customers within PSPS areas by December 31, 2021. On January 5, 2022, the program was expanded to include eligible customers in the remaining areas of PacifiCorp's California service territory. During the initial phase (phase 1-2) of the program, 32 batteries were delivered to 27 customers. Phase three of the program launched in January 2022 also to expand to remaining areas of the northern California service territory; during this phase, 31 batteries were delivered to 29 customers before the wildfire season started. Customer outreach was completed again in October of 2022 for 52 customers (phase 4), resulting in 22 batteries being delivered to 17 eligible customers by year-end 2022. In 2023, 8 batteries were delivered to eligible customers. PacifiCorp will continue to work with its contractor to deliver the program in 2024.

#### *Resiliency Efforts*

PacifiCorp previously offered a program with grants 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 in the form of Tier 1 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.

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<sup>9</sup> <https://www.pacificpower.net/outages-safety/storm-emergency-preparedness/backup-generators.html>

- 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 applicant/community and their site and is still in the construction phase.

#### 2.1.4 Emergency Operations Centers

##### *Preparation Exercises*

When a PSPS is forecasted, PacifiCorp immediately opens an Emergency Coordination Center (ECC) with an ECC Executive to oversee all aspects of the response. The process is reviewed and available in the annual General Order 166 (GO 166) report, provided as Appendix B of this report. The next update to the GO 166 Report will take place in April 2024.

PacifiCorp has established an Emergency Coordination Center (ECC) following the National Incident Management System (NIMS) guidance. The ECC staff is available to support all hazardous responses to include PSPS events. The ECC plays a vital role in monitoring and verifying AFN customers are contacted prior to an event. The status of each AFN customer impacted by a PSPS is provided to the ECC Executive to determine if additional action by the Company or local emergency management is required to support the AFN customer.

##### *Training*

PacifiCorp conducts annual emergency plan reviews, and exercises and all agencies are invited to attend. Representatives from County Public Health Departments and Community Based Organizations are invited and attend pre-fire season tabletop exercises.

PacifiCorp is currently enhancing and expanding the training program for ECC staff. The training standards are being developed with other California-based utilities and the California Office of Emergency Services utilizing National Incident Management System (NIMS) courses.

PacifiCorp conducts annual PSPS exercises utilizing a Whole Community approach annually. 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. Additional plans for training and PSPS exercises will be reported in the Company's upcoming post-season PSPS report as required by D.21-06-034.

##### *Liaison*

Contacting AFN customers is embedded in the ECC Process. The ECC organizational structure includes a Liaison position responsible for ensuring all AFN customers receive appropriate communication; this responsibility will shift to the AFN Liaison position once filled. The number of customers with AFN is identified through a GIS customer list and is provided to Mission Control and the ECC Executive. During each ECC meeting, Mission Control provides an update to the ECC Executive, and any issues or concerns are escalated to the local Emergency Manager via the Liaison.

### 2.1.5 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. Communications efforts are listed in the WMP and Emergency Response Plan Playbook which provide both messaging and cadence for public and stakeholder communications throughout the preparation, response, and restoration cycle. Communication with AFN customers and external stakeholders as early as possible is essential. The PacifiCorp Joint Information Team has established processes and tools to facilitate communication with the public, news organizations, government entities and external stakeholders through social media, website restoration information, press releases and notification protocols while ensuring the messaging is consistent and comprehensive.

#### *AFN Public Education and Outreach*

PacifiCorp provides additional PSPS notifications to individuals classified as medical baseline customers in PacifiCorp's customer service system and to individuals who self-identify as having access and functional needs (AFN). 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 the Company's AFN population to help inform the Company's communication outreach related to those customers. 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 strategy, and the company has adjusted and expanded where key messages are disseminated to increase AFN self-identification.

#### *Accessibility of Communications*

Pre-fire season, PacifiCorp enhances online customer communications through the website, customer notification emails, social media, wildfire webinars and partnership with Community Based Organizations, Tribal Authorities, companies providing medical equipment, local governments, and community centers to amplify the reach to customers and clients. PacifiCorp's website provides digital brochures and handouts that contain information on resiliency for medical equipment, wildfire preparedness, how to identify as AFN, and the medical baseline program. Information is available through customer service in multiple languages including Chinese traditional, Chinese simplified, Tagalog, Vietnamese, Mixteco, Zapoteco, Hmong, German, and Spanish.

The Company's customer care 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 the customer receives the wildfire safety and preparedness and PSPS-related information they need.

#### *CBO Outreach*

Additionally, PacifiCorp, through a third-party vendor, MDC Research, conducts annual online and phone surveys with customers. This includes independent living, assisted living and skilled nursing centers, AFN representatives and CBOs located in potential PSPS areas regarding the company's PSPS and wildfire safety communications.

In-depth interviews conducted with CBOs in PacifiCorp's California service area took place in Fall 2023. CBOs include the Karuk and Yurok Tribal nations, the Salvation Army, Modoc and Siskiyou Counties, the City of Dunsmuir, the South Yreka Fire District, and the Siskiyou Economic Development Council. The interviews lasted 30 minutes and were conducted virtually.

Key findings include:

- Emergency services agencies report direct communications between themselves, other agencies, and Pacific Power for wildfire safety issues and power outages
  - Communications are typically direct and personal, using email, phone, or text, between emergency services and Pacific Power
  - In-person meetings, table-top exercises, and community meetings are considered particularly effective, especially concerning emergency situations that may involve evacuations or the need for resource centers
  - Emergency messaging services are used during emergencies when reaching out to the public; however, given the isolated and rural nature of many communities, it is important for offline communications methods to be employed, such as message boards for personal contact
- Agencies report clear lines of communication between agencies and with utility partners; a mix of personal relationships and regular exercises helps keep lines of communication open and clear
- Emergency services and tribal agencies appreciate partnership with Pacific Power for communication about wildfire safety, preparedness, and PSPS, and are interested in working together to reach the community
  - Information shared across multiple agencies is typically passed on to the public using official channels including as agency public information officers, city, or county government, or through official social media channels
  - Offline communications (mailings, flyers, print, radio) are important to reach the elderly community and those in rural areas with limited connectivity
  - Agencies are willing and interested in reposting or linking to content from Pacific Power related to electric safety or outages; they do prefer Pacific Power focus on the factors they own, and leave evacuation preparation, etc. to emergency management agencies
  - Community meetings can also be an effective way to reach the public, and provides an opportunity for Pacific Power's to participate
  - Emergency automated phone or text messages (e.g., reverse 911) is used in emergency situations, as well as physically posting messages as well as door to

door canvassing, in the event of emergencies but this is not suitable for informational communications

- Direct communications by Pacific Power are recommended, including mailings, emails, or social media engagement; it is important to use multiple methods to reach the entire community
- English and Spanish are the primary languages required; the Karuk and Yurok languages are spoken within the tribal communities
- The most effective information and resources Pacific Power can provide to help prepare the community include:
  - Education about PSPS, and ensuring the community is aware of the program and understands why PSPS events may be triggered
  - Information about Pacific Power's efforts to mitigate the risk of fire in the area and that an outage is a last resort to maintain safety
  - General information about best practices for brush clearing, preparing properties, food storage, evacuation, insurance coverage, water storage, and how to manage an extended power outage
  - Special outreach to those with medical needs, particularly those in isolated rural areas, to ensure they have the support needed to weather an extended outage
- There is interest in programs to provide generators to tribal and rural communities, who are far removed from support resources and are vulnerable to food spoilage and more likely to have medical needs that rely on electricity
- For emergency response agencies, maintaining close contact during fire or PSPS events is crucial
- Due to the constantly changing nature of PSPS events, frequent communication with emergency services agencies and the public is incredibly important
  - Emergency response agencies understand that situations frequently change and the need for flexibility around PSPS events; regular and timely communication is key to handling fluid circumstances
  - Early communication is helpful if possible; it is perceived to be better to provide proactive notifications and then updates if a PSPS is no longer necessary or if timing changes
  - Public-facing educational content about preparation is recommended during the off-season with a big informational push in the late spring/early summer to kick off fire season
- Special attention is required for those needing medical equipment, the elderly, low-income residents, and those in very isolated rural areas



- Social media is considered a useful tool and widely used by all organizations, but it has some limitations when it comes to reaching the most vulnerable populations
  - Direct communications from Pacific Power (mailings, bill inserts) are optimal for reaching the general population with educational content, and reverse 911 is most effective in an emergency
  - Research participants are not aware of Pacific Power’s generator rebate program, but do acknowledge the need for support with generators for those with medical needs, in rural areas, and for those who cannot afford to purchase generators on their own
- These findings help to inform and evolve how PacifiCorp utilizes CBO communication channels without adding extra burden to these organizations. Thus, 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, or through direct outreach to community organizations by company corporate communications staff.

### *Tribal Engagement*

The Karuk Tribe is 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 Council. 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. As part of a goal to hear from different stakeholders, PacifiCorp interviewed a representative from the Karuk Community Center in 2021 during the semi-annual survey. PacifiCorp also conducted another survey with a different Karuk Tribe member in November of 2023 to ensure that we are taking into account new and updated information from appropriate Tribal staff and officials.

#### 2.1.6 Community Resource Centers (CRCs)

##### *Planning and Standards*

PacifiCorp has developed a comprehensive CRC plan which includes provisions in accordance with the Americans with Disabilities Act. CRCs are in areas which will be easy to access. When activated, the CRCs will be listed on the company public website.

All CRC locations were chosen by location through collaboration with local emergency managers. CRC locations are then vetted using a checklist that was developed with guidance from Public Utilities Commissions 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.

Pacific Power emergency management meets regularly with local and regional Access and Functional Needs groups, local Emergency Managers, and other support groups to ensure CRC, AFN, & medical baseline needs are identified, and resources are both equitable and accessible. Services/resources provided include:

<ul style="list-style-type: none"> <li>✓ Shelter from environment</li> <li>✓ Air conditioning</li> <li>✓ Air Purifiers &amp; Air Quality Monitors</li> <li>✓ Potable water &amp; non-perishable snacks</li> <li>✓ Seating and tables</li> <li>✓ Restroom facilities</li> <li>✓ Refrigeration &amp; heating for medicine and/or baby needs</li> <li>✓ Interior and area lighting</li> <li>✓ On-site security</li> <li>✓ Televisions</li> <li>✓ Ice and water</li> </ul>	<ul style="list-style-type: none"> <li>✓ Communications capability such as Wi-fi access, satellite phone, radio, cellular phone etc.</li> <li>✓ On-site medical support (EMT-A at a minimum, paramedic preferred)</li> <li>✓ Charging stations for cell phones, AM/FM/weather radios, computers, etc.</li> <li>✓ Small crates for pets</li> <li>✓ AFN/LEP population support</li> <li>✓ Personal Protective Equipment</li> <li>✓ Portable ADA ramp</li> </ul>
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## 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 (email, 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 critical stages of the PSPS process, including for pre-event warnings, an actual event, and re-energization.

#### *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 employees make personal phone calls to each customer. PacifiCorp sectionalizes circuits into small zones for possible de-energization. By reducing the number of customers affected by an event, the number of AFN customers is subsequently reduced. The smaller numbers allow PacifiCorp to personally reach out to each AFN customer. The results of the contact are reported to the ECC Executive. Contact occurs prior to an event, at the beginning of re-energization, and after energization is completed. If the AFN customer needs additional assistance, the ECC Liaison can quickly relay the information to the county’s emergency manager.

#### *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](http://www.pacificpower.net/psps). The web-based tool allows members of the public to enter an address into a search bar to determine 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 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 2023 that intended 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 mapping tools that allow users to access targeted local forecasts, more effective graphical displays of weather data, new geographically representative forecasts, and improved website navigation mechanics.

When there is an event, Mission Control personnel take on the role of updating the PSPS website. The Company’s PSPS website is fundamentally a content only (with PSPS area polygons imposed on maps) static site with no dependency on any backend applications. PacifiCorp’s website performed well serving content during the September 2020 windstorm event where a significant surge in web visits – 200,000 + web visitors with more than 1.6 million web page views. This event demonstrated capable broadband performance.

#### *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, etc. The portal is accessible to public safety partners during PSPS events to assist in the notification and collaboration 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 2024.

#### *PSPS Customer Notifications*

- Multiple communication channels are used for customer notifications:
  - Outbound Calls
  - Social Media Updates
  - Texts and emails
  - Website update
  - Press Release
  - Personal phone calls to AFN customers

## **2.3 Recovery (After – Power has been restored)**

### **2.3.1 AFN Support**

AFN customers are contacted by a Customer Service employee of the company after the power is restored. It is 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.

#### *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. Additionally, the California Public Utility Commission requires a specific post-event report to be filed with them in compliance with Resolution ESRB-8.

#### *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. Semi-Annual customer surveys and ongoing reporting provide routine feedback and measurement of PacifiCorp's performance before, during, and after an event.

## **3. INFORMATION COLLECTION, ANALYSIS AND DISSEMINATION**

### **3.1 Customer Privacy**

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, we have 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.**

#### *FEMA Step 6: Implement and Maintain the Plan*

As PacifiCorp implements the 2024 AFN Plan, quarterly updates will be provided to the California Public Utility Commission. Revisions to the change will be tracked each time the plan is modified. It describes the revisions made, the locations of the revisions, the names of the persons responsible for the revisions, and dates of 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