

**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

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ACCESS AND
FUNCTIONAL NEEDS PLAN FOR PUBLIC SAFETY POWER SHUTOFF SUPPORT
PURSUANT TO COMMISSION DECISION IN PHASE TWO OF R.18-12-005**

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Southern California Edison Company (SCE) hereby submits its Access and Functional Needs Plan for Public Safety Power Shutoff Support Pursuant to Commission Decision in Phase Two of R.18-12-005, attached hereto Attachment A.

Respectfully submitted,

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Attachment A

Southern California Edison's Access and
Functional Needs Plan for Public Safety
Power Shutoff Support Pursuant to
Commission Decision in Phase Two of
R.18-12-005

June 1, 2020

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1 Introduction

Pursuant to the California Public Utilities Commission’s (CPUC or Commission) Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk (Decision),¹ Southern California Edison Company (SCE) provides the following plan regarding its efforts to address people/communities with access and functional needs (AFN) during de-energization events (“AFN Plan”). SCE will supplement this information in future required quarterly and annual updates regarding the progress towards meeting the established plans and the impact of its efforts to address this population during de-energization events.

As defined in the Public Safety Power Shutoff (PSPS) Order Instituting Rulemaking (OIR) Phase 1 decision,² AFN populations consist of “individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency or who are non-English speaking, older adults, children, people living in institutionalized settings, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant.”

SCE performed an analysis to identify the percentage of the SCE customer base that meets this definition of AFN and found that approximately 80% of SCE’s total customer population would qualify as people with access and functional needs, according to the definition in the Phase 1 decision. While SCE efforts will encompass the entire AFN population with specific needs, SCE will provide more attention and resources to the most vulnerable. As an example, a customer might have multiple simultaneous needs (e.g., disabled, low-income, has medical equipment, and is limited-English speaking). These AFN customers could be considered more “vulnerable” than other customers.

This AFN Plan focuses on the most vulnerable populations in SCE’s service area, such as medical baseline and low income customers. It includes a summary of the research, feedback and external input that has shaped the AFN population support strategy, the programs that serve these vulnerable customers, the preparedness outreach approaches that are focused on vulnerable populations, and the in-event AFN customer communications. SCE will provide a quarterly update of this AFN Plan, as required.

2 External Feedback and Consultation

2.1 Customer Feedback / Research

2.1.1 Customer Research

SCE is committed to further understanding and responding to the needs of our AFN customers during PSPS events; therefore, we have partnered with stakeholders such as community-based organizations (CBOs), independent living centers (ILCs), and public agencies to research and learn more about the needs of our AFN customers. Additionally, we plan to continue reaching out to customers directly for feedback through surveys and community outreach events.

2.1.2 Customer Feedback/Surveys

In early 2020, SCE conducted surveys that assessed the effectiveness of our 2019 customer communications and community outreach efforts, including a wide range of wildfire-related topics.

¹ The Decision was adopted by the Commission on May 28, 2020.

² Decision 19-05-042, pp. A6 – A7.

The surveys were conducted with about 2,000 residential and 700 business customers in both HFRA and non-HFRA areas in our service territory. Customers were given the option to take the surveys in English or Spanish. Additionally, SCE conducted monthly surveys—offered in English, Spanish, and additional languages—to monitor perceptions of SCE’s commitment to protect communities from the risks of wildfires and customer awareness of SCE’s PSPS program. AFN customers were included in these surveys, with approximately 25% of the responding customers indicating they have an individual in the home who has some sort of disability. In reviewing the survey data across the sample groups, there are virtually no significant differences between the responses provided by those with disabilities in their household versus those without.

In 2020, SCE is developing surveys that will specifically target its AFN populations and will use those results to enhance support to its AFN population during PSPS.

2.2 Consultation with Interested Parties and Advisory Councils

SCE engages with diverse community stakeholders to inform and focus ongoing efforts to increase effective AFN outreach and awareness. SCE’s Wildfire Mitigation Plan (WMP) outlined its strategy and objectives in reaching the all-encompassing definition of AFN within its territories from 2020-2022.³ SCE supports existing relationships with CBOs throughout its territory and is working to expand those relationships with trusted agencies that support our AFN customers.

SCE engages with CBOs at both the state and local levels. In addition, SCE participates in weekly meetings with other IOUs and state agencies to provide real-time updates and share best practices and lessons learned on community outreach and engagement. On the local level, SCE continues to build on existing nonprofit relationships and build new partnerships with CBOs including faith-based and grassroots organizations in HFRA. SCE prioritizes participation in CBO collaboratives with diverse member organizations serving AFN populations. SCE regularly engages in meetings with the Inland Empire Disability Coalition, Inland Empire Concerned African American Churches, and California State Council on Developmental Disabilities’ Safety Committee.

2.2.1 SCE’s Consumer Advisory Panel

SCE has regularly engaged and consulted with members of its Consumer Advisory Panel (CAP), which meets three times per year. The CAP includes diverse community stakeholders across SCE’s service area. Members are leaders in the nonprofit, community, and business sectors that represent various AFN and consumer groups including communities of color, veterans, disabled, LGBTQ, and low-income customers. For the past three years, CAP members have regularly been briefed on SCE’s wildfire mitigation efforts and provided feedback that has helped shape SCE’s customer service and outreach into these diverse communities. In 2019, SCE appointed two new CAP members who live and work in HFRAs including an executive director of an independent living center. Since the state’s stay-at-home order has been in place, SCE has convened the CAP more frequently with bi-monthly meetings planned through the end of 2020. PSPS and wildfire mitigation have been standing topics of discussion and consultation on all recent agendas. SCE will continue to consult and partner with CAP members who are eager to provide support in reaching AFN and diverse communities. These activities will include the bi-monthly meetings, one-on-one engagements, and joint meetings/presentations with local stakeholders.

³ See SCE’s 2020-2022 WMP, pp. 5-110 to 5-117.

2.2.2 Independent Living Centers

SCE established partnerships with eight designated ILCs across its service area to prepare AFN communities for PSPS. The ILCs are dedicated to increasing independence, access and equal opportunity for people with disabilities. Collectively, they provide direct services to the following counties within SCE's service area: Inyo, Kern, Los Angeles, Mono, Orange, Riverside, San Bernardino, Santa Barbara and Ventura Counties.

SCE's ILC partnerships will leverage the subject matter expertise of AFN advocates and members of the AFN community to provide appropriate, accessible and impactful education and outreach to SCE's AFN customers. Outreach will promote enrollment in SCE's Medical Baseline⁴ Program, which also offers SCE customers the ability to receive enhanced notifications for PSPS events and will include workshops and trainings to provide preparedness education and assistance in applying for the Medical Baseline Program. The planned AFN outreach activities will be closely monitored and adjusted as needed through regular meetings with individual ILCs, as well as larger meetings with all eight ILCs. Additionally, SCE begins engaging its ILCs and other CBOs when de-energization events are unfolding so that they can be prepared to aid their impacted populations based upon the areas of impact.

SCE convened the California Foundation for Independent Living Centers members in our service territory in January and May 2020 and hosted them in February 2020 for a tour and presentation of our Emergency Operations Center.

2.2.3 Statewide AFN Council

SCE's mission is to safely and reliably deliver affordable clean energy to the customers and communities it serves. SCE is committed to understanding the unique and diverse needs of its AFN customer populations and has committed resources and funding to support the launch of the first Statewide AFN Advisory Council in partnership with the Joint Utilities. As stated in the PSPS OIR Phase 1 decision, "the electric investor owned utilities must make a diligent effort to identify AFN populations within their customer base."⁵

SCE worked with the other Independently Owned Utilities (IOUs) to establish an external AFN Advisory Council, comprised of a diverse group of recognized CBO leaders supporting the AFN population as well as members and advocates from within the AFN community. SCE expects the Statewide AFN Council will serve as an appropriate foundation for successfully serving its AFN customers. The AFN Council opens the dialogue to discuss unique needs of this most vulnerable population and to develop a holistic strategy on how to better serve our AFN customers. The board of the AFN Council will be comprised of IOUs, state leaders (e.g., Cal OES, CPUC), and statewide CBO leaders who support the AFN population.

The initial kick-off of this Advisory Council is scheduled for June 15, 2020. The Statewide Advisory Council will aid all stakeholders in developing and executing upon meaningful strategies to serve its AFN populations and provide independent expertise to help ensure that utility customer programs incorporate best practices to improve service now and in the future. The Council will also help utilities and other stakeholders further develop their AFN strategies to ensure robust programs that will

⁴ The Medical Baseline Program provides additional low-cost electricity to any customer who uses an electrically operated medical device in their home as authorized by their physician or physician designee. Note that the requirement for the device to be authorized by a physician has been suspended during the COVID-19 pandemic.

⁵ D.19-05-042, Appendix A, pp. A12.

adequately and appropriately educate, communicate with, and aid its AFN populations in building resiliency for de-energization events such as PSPS.

2.2.4 CPUC Disadvantaged Communities Advisory Group

Senate Bill 350 (De Leon, 2015), as codified in Public Utilities Code section 400(g), requires the CPUC and the California Energy Commission (Energy Commission) to establish a Disadvantaged Communities Advisory Group consisting of representatives from disadvantaged communities (Advisory Group). The Advisory Group is to review and provide advice on proposed clean energy and pollution reduction programs and determine whether those proposed programs will be effective and useful in disadvantaged communities.

The Energy Commission and the CPUC adopted the Charter for the Advisory Group on December 13, 2017, in Energy Commission Resolution 17-13-2, and on December 14, 2017, in CPUC Resolution E-4893, respectively. The Advisory Group meets on a quarterly basis in locations across the state.

Disadvantaged communities are areas throughout California that most suffer from a combination of economic, health and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, presence of hazardous wastes, as well as high incidence of asthma and heart disease.

Although living in a disadvantaged community does not necessarily mean that a person belongs to an AFN population, there is likely some overlap. In addition, disadvantaged communities in SCE's service area have some overlap within SCE's HFRA. SCE is committed to engaging with this Advisory Group, as well as the various other advisory councils and groups described in this Plan, to provide information about its wildfire mitigation activities, including PSPS. SCE also intends to inform the Advisory Group of its activities for outreach, education and resiliency building for its AFN populations.

2.2.5 Environmental and Social Justice (ESJ) Coordination Forum

SCE has created an internal, cross-functional ESJ Forum to support: (1) taking the needs and concerns of ESJ communities into consideration as we conduct our business, so as to minimize disparate impacts between communities; and (2) proactively expanding access to clean energy and resiliency resources and services in these communities.

The ESJ Forum can help SCE enhance its AFN strategies by: (1) coordinating ESJ activities and communications internally and externally; (2) providing input on new and ongoing ESJ policies, programs, and projects, (3) providing recommendations to SCE management on important ESJ issues; and (4) supporting a company-wide culture that routinely takes ESJ issues into consideration as SCE conducts its work.

The CPUC's 2019 ESJ Action Plan defines an ESJ Community broadly as a community where residents are:

- Predominantly communities of color or low-income,
- Underrepresented in the policy setting or decision-making process,
- Subject to a disproportionate impact from one or more environmental hazards, and
- Likely to experience disparate implementation of environmental regulations and socio-economic investments in their communities.

The intent of this definition is to ensure that it is inclusive. These communities are further defined using more traditional categories that include but are not limited to:

- Disadvantaged communities located in the top 25% of communities identified by Cal EPA's CalEnviroScreen (the traditional definition),
- Low-income census tracts below 80% of the State or Area Minimum Income (Note: not all low-income areas are located in disadvantaged communities since CalEnviroScreen weighs air quality heavily in addition to financial indicators), and
- All tribal lands (tribal lands belong to sovereign governments and as such are not included in many state/federal screening methods such as CalEnviroScreen; however, the majority of tribal lands would fall into either the low-income or disadvantaged community category when their data is compared against the screening criteria).

The ESJ Forum provides extraordinary value when taking the needs and concerns of ESJ communities into consideration as we conduct our business so as to minimize disparate impacts between communities and proactively expand access to clean energy and resiliency resources and services in these communities. Naturally there is overlap between the ESJ and AFN populations and, therefore, SCE will leverage these efforts as it advances its AFN Plan.

2.2.6 Regional Working Groups and Advisory Board

SCE is actively engaging with organizations and agencies today that serve individuals identified as AFN customers to gain insights to the unique and diverse needs of this population of customers. SCE's AFN Plan includes organizing Regional Working Groups and Advisory Boards that will further serve to enhance its overall AFN strategy. As described in this Plan, SCE has numerous engagements with Advisory Boards and Working Groups and is currently evaluating the structures and charters of those forums to identify gaps while coordinating efforts to meet the spirit of the Decision.

3 Customer Programs and Available Resources

3.1 Resources for Vulnerable Populations

3.1.1 Critical Care Battery Back-up Program

IN 2020, SCE is implementing its Critical Care Battery Back-up (CCBB) Program that will aid SCE's most vulnerable customers during PSPS de-energization events. The purpose of the program is to provide a fully subsidized portable backup battery solution to eligible customers in SCE's service area, which will aim to provide sufficient power to operate the customers medical devices for up to twenty-four hours in the event of any de-energization. Customers that are Income Qualified Critical Care (IQCC)⁶ in HFRA Tiers 2 and 3 will be eligible for this program.

SCE's CCBB will:

- Promote clean portable electric battery back-up solutions and reduce reliance on fossil fuel generators,
- Appropriately size batteries based on load consumption analysis conducted during customer assessment,
- Fully subsidize a solution for all eligible customers, and
- Provide a simple customer experience with no upfront costs that is modeled around SCE's Direct Install program.

⁶ IQCC customers are those that are enrolled in both an income-qualified program such as California Alternate Rates for Energy or Family Electric Rate Assistance and Critical Care.

SCE is beginning outreach to eligible customers and plans to deliver approximately 2,500 batteries to eligible customers in 2020. SCE described this program in its WMP and its 2021 GRC application (A.19-08-013).

3.1.2 Medical Baseline

SCE encourages customers who require the use of electrically operated medical equipment to sign up for the Medical Baseline Program. SCE conducts outreach to raise customer awareness about this program using the following tactics:

- Quarterly bill inserts directing customers to www.sce.com/medicalbaseline, www.sce.com/psps and www.sce.com/wildfire.
- Conversations with customer service representatives in SCE’s contact center or in person at community events,
- Information provided at Community Resource Centers (CRC) or by Community Crew Vehicles (CCV) during PSPS de-energization events,
- Partnerships with CBOs and other agencies to raise awareness of and increase enrollment in the program.

SCE recently made significant enhancements to its Medical Baseline Program to aid customers by allowing customers to enroll through an online process (while continuing to accept paper applications). Additionally, in response to the COVID-19 pandemic, SCE temporarily suspended all Medical Baseline re-verifications to ensure that customers are not removed from the program because they are unable to visit their physicians during the “safer at home” orders. SCE also temporarily relaxed the requirement of providing a physician’s signature to initially enroll in the program during the pendency of these orders.

SCE’s Medical Baseline Program provides customers electricity at a discounted rate. In addition, this program provides more tailored customer care, for instance by allowing customers to list other individuals to receive important alerts and notifications about their electric account through multiple contact methods, which may be crucial during de-energization events or emergencies. For those identified as relying on medical equipment for life support, SCE takes additional measures to confirm these customers receive the outbound alerts and notifications for PSPS events, including sending a representative to their door to deliver the message, if necessary.

SCE works directly with local offices of emergency services to share information about its most vulnerable customers so that they are aware of the customers in their communities that may require assistance during PSPS events.

3.2 Self-Generation Incentive Program (SGIP)

SCE is committed to promoting clean energy solutions that expand the growth of distributed generation in disadvantaged communities and increase customer resiliency in HFRA. To support this goal, the statewide SGIP has been modernized with targeted incentives for resiliency related to wildfires and for low-income customers. The program provides financial incentives for the installation of energy storage to meet all or a portion of the electric energy needs of a home or business.

The purpose of the SGIP is to reduce greenhouse gas emissions, demand, and customer electricity purchases, increase electric system reliability through improved transmission and distribution system utilization, as well as create market transformation for distributed energy resource technologies.

The SGIP's Equity Resiliency Incentive program offers incentives for resiliency options to vulnerable customers with limited income. SCE launched these new incentives to its customers and has already fully subscribed its first budget allotment. SCE intends to request CPUC approval to increase the budget allotment.

3.3 Community Resource Centers (CRCs) & Community Crew Vehicles (CCVs)

During PSPS events, SCE establishes CRCs at third-party facilities as a public destination offering device charging, information, Wi-Fi or cellular service, water, light snacks, a sitting area, and access to restrooms. CRCs and CCVs have three-pronged extension cords that enable charging of most home medical equipment. Some CRCs may also have refrigeration for temporary storage of medication. In response to the COVID-19 pandemic, some features may not always be available as SCE tailors its CRCs to meet state and local social distancing requirements. In addition to CRCs, SCE deploys CCVs equipped with backup power so that customers can charge their personal mobile devices and continue to receive information/updates from SCE about the outage, listen for relevant public safety broadcasts, and/or connect with friends and family concerned with their well-being during PSPS events. CRCs and CCVs are not specifically targeted to AFN populations, but they are vital resources for these customers, as well as SCE's overall customer population.

3.4 Resiliency Zones

SCE established the Resiliency Zones pilot to energize limited essential services in rural communities. SCE is targeting seven rural communities (Tehachapi, Acton, Agua Dulce, Idyllwild, Bridgeport/Lee Vining, Mammoth, Cabazon), and up to three sites per community, including the installation of a transfer switch to accommodate temporary backup generation dispatched during the PSPS period of concern. SCE is targeting site readiness by third quarter of 2020.

3.5 211 Referral Service

In 2019, SCE established partnerships with seven 211 service providers throughout the SCE service territory where customers can receive information suitable for their unique needs during PSPS events or other emergencies. 211 organizations provide free information and referral services using rich data and access to live, trained specialists to connect people to services in their communities 24/7. As part of the partnership, 211 service providers will be assessing current capabilities and developing or augmenting their databases with AFN resources and referrals.

3.6 SCE Programs Serve Low-Income Customers

SCE promotes relevant programs that serve AFN customers in advance of PSPS events to support preparedness, cost savings and resiliency. SCE understands that some of our customers may be experiencing COVID-19-related financial hardship due to quarantine, illness, caring for loved ones or business closures. These income-qualifying customers can apply for assistance to pay their electric bill.

Energy Assistance Fund (EAF)

EAF is designed to provide a one-time assistance to our customers facing financial hardship.

Income Qualified Programs: CARE and FERA

SCE provides income-qualifying households discounted rates on their electric bill. The CARE

program provides qualifying customers a discount of about 30 percent and FERA provides a discount of 18 percent on the monthly bill.

4 Customer Preparedness Outreach & Community Engagement

4.1 Direct-to-Customer Outreach

4.1.1 Advertising campaign educating customers about preparing for power shutoffs

The 2020 PSPS campaign continues SCE's effort to educate all SCE customers, particularly in HFRA, about PSPS, alert sign-up, emergency preparation (including for those who use a life-saving device or other medical equipment) and SCE's wildfire mitigation work. The campaign is currently in six languages (English, Spanish, Chinese, Korean, Vietnamese and Tagalog) and will expand to additional languages (Khmer, French, Russian, Japanese, Arabic, German, Farsi, Punjabi and Armenian) by year end.

4.1.2 Letters about potential power shutoffs planned for all customers in service territory

The 2020 Dear Neighbor newsletters (HFRA and non-HFRA) focusing on PSPS and wildfire mitigation are being mailed to all customers starting at the end of May through early June 2020. The HFRA newsletter focuses on PSPS, including our notification process and decision-making factors for PSPS. The non-HFRA newsletter focuses on emergency preparedness and includes an overview of PSPS. Both versions provide an update on our wildfire mitigation efforts, helpful emergency preparedness websites and ways to sign up for alerts. A list of SCE customer service contact numbers and PSPS website (in-language versions, where available) was provided in English, Spanish, Chinese, Korean, Vietnamese, Cambodian, Tagalog, Arabic, Armenian, Farsi, French, German, Japanese, Punjabi and Russian. These letters are sent to SCE customers, including AFN customers.

4.2 Participation in Community Events

4.2.1 On-going community meetings held in high fire risk areas

Since 2018, SCE has hosted more than 35 community meetings in areas that could be impacted by PSPS and is continuing to hold such meetings in 2020. SCE invites every customer within HFRA to learn about PSPS, what to expect before, during and after events, and to interact with agencies that support resiliency planning. Additionally, SCE customer service representatives are available to update contact preferences (this service was not available for the on-line meetings held in response to COVID-19-related restrictions on in-person meetings) and explain how customers can update contact information on SCE's website. The 2020 on-line community meetings use the Skype Meeting Broadcast platform and offer closed captioning in six languages (English, Spanish, Chinese, Vietnamese, Korean, and Tagalog). Recorded versions of the meetings are posted to SCE's YouTube channel, which provides the ability to view closed captioning in several different languages, including the 15 languages that are prevalent in SCE's service territory. SCE also provided American Sign Language (ASL) translation for hearing-impaired customers at the in-person community meetings. SCE is also looking to add ASL translations to the recorded on-line community meetings.

4.2.2 Meetings with cities, counties and tribal governments

In 2020, SCE will continue to regularly engage with local government officials, tribal staff and first responders to educate stakeholders on SCE's 2020-2022 WMP and its potential impact on their communities. These meetings will focus on educating local and tribal governments about the PSPS de-energization process and how the company will communicate and work with government agencies and emergency operations during outages. SCE will solicit advice on outreach to the AFN population in meetings with County Operational Areas.

4.3 CBO Engagement/Community Partnerships

In 2019, SCE formed, and enhanced, partnerships with trusted and reputable organizations that work directly with AFN customers. SCE is partnering with Mixteco/Indigena Community Organizing Project to coordinate direct outreach to community members and to deliver PSPS public service announcements in the indigenous languages of Mixteco, Zapoteco and Purepecha. SCE is also partnering with 211 service providers and ILCs throughout the service territory, as noted above.

5 In-Event PSPS Customer Communications

5.1 Event Notifications

As documented in the 2020 WMP, SCE understands its stakeholders have different needs and require varying methods of alerting and warning to ensure proper notification. For example, first responders, public safety partners, and local governments require as much lead time as practical to begin contacting constituents and preparing to respond to potential de-energization. To support this need, SCE generally provides priority notification to these agencies upon activation of its emergency operations center, typically 72 hours before a potential PSPS event. Additional alerting and warning update notifications are made at 24-hour intervals to coordinate with these agencies. SCE begins initial alerting and warning messaging to remaining customers up to 48 hours in advance of a potential PSPS event.

SCE has a comprehensive plan for communicating with its customers during emergencies, especially during outages, which includes a schedule of notifications for repair (unplanned) outages and maintenance (scheduled) outages. Automated outbound notifications are sent to customers via the customer's preferred method of contact (including email and text message) when an outage occurs, as outage restoration times are determined or shifted, and upon conclusion of the outage. For maintenance outages, SCE provides advanced notice to customers at least three days prior to the outage, but usually up to two weeks prior. SCE provides an automated reminder 24 hours ahead of the scheduled outage and SCE's Outage Map on SCE.com provides customers with outage information in their service location. Notifications are offered in multiple languages.

In late 2019, SCE implemented zip code-level alerting for PSPS events. Zip code alerting enables non-SCE accountholder populations to enroll to receive PSPS notifications based on their preferred zip code(s) within the SCE service area. In 2020, SCE will further enhance zip code-level alerting to include in-language notifications in alignment with its existing notification abilities for SCE customers. Furthermore, SCE is in discussions with technology partners to use public alert messaging to notify anyone in an area affected by an active PSPS without them needing to sign up for alerts on SCE.com. This capability is similar to "Amber Alerts" and leverages the Common Alerting Protocol technology.

5.1.1 Medical Baseline Notifications and In-Person Notifications for Life Support Customers

Customers who are enrolled in SCE's Medical Baseline Program and whose physician has indicated

that the equipment is used for life support purposes (i.e., customer cannot be without life support equipment for at least two hours) are identified upon enrollment as Critical Care customers. Critical Care customers receive additional contacts prior to disconnection or interruptions of service. When a public safety event is forecasted, SCE takes additional measures to provide these customers with alerts and notifications, including using in-person notifications, if necessary.

SCE also monitors sent and undelivered PSPS notifications. When SCE is unable to confirm that a Critical Care customer has received PSPS notifications, SCE attempts to contact them directly. In those circumstances where SCE is unable to contact those critical care customers, SCE will deliver an in-person notification.

5.2 Media

Facebook and Twitter

SCE uses social media to provide PSPS communication updates, such as locations of deployed CCVs or activated CRCs.

Nextdoor Application

SCE uses Nextdoor as an additional platform to communicate with its customers in targeted neighborhoods during a PSPS event. Only customers who are registered on the Nextdoor App for their specific neighborhood would see the communication.

5.3 Notification Effectiveness

In 2019, SCE conducted after-action reviews with impacted emergency management agencies to solicit feedback on its PSPS process, including SCE's notification and outreach efforts. SCE intends to continue and enhance these meetings in 2020. In addition to the after-action review meetings, SCE held routine calls with county emergency management agencies to coordinate planning and response efforts, including discussion of how SCE notifies and engages customer groups. SCE also solicited feedback from its critical infrastructure partners regarding its PSPS communications in workshops. In addition, during the larger PSPS events in 2019, SCE coordinated with the California Utilities Emergency Association to conduct daily operational briefings with critical infrastructure providers, where they could discuss the effectiveness of SCE's communications.

SCE conducted post-wildfire season surveys with both residential and business customers from December 2019 to March 2020, which included demographics questions about customers with disabilities and medical equipment need.

5.4 Website

On SCE's website (SCE.com), customers can find content about SCE's wildfire mitigation efforts, learn tips for how to become more resilient during major events and receive up-to-date information regarding PSPS in their area. Radio, digital banners/videos and social media advertisements also drive visitors to SCE.com for more information. SCE also maintains a toll-free (1-800) phone line staffed with trained personnel from SCE's customer operations who receive calls from impacted customers as a priority.

SCE.com is WCAG 2.0 AA compliant. We have designed and tested the site to support visitors who use a wide range of assistive technology to access the internet, including screen readers, and have optimized our maps to support visitors with color blindness. We have also translated our website into five languages, Spanish, Korean, Chinese, Vietnamese, and Tagalog.

5.5 Call Center Support

Customer service representatives continue to support our customers during PSPS events by answering questions, addressing concerns, and escalating potential issues that arise.