

September 8, 2020

*Via E-mail Transmission Only*

President Marybel Batjer  
Commissioner Liane Randolph  
Commissioner Martha Guzman Aceves  
Commissioner Cliff Rechtschaffen  
Commissioner Genevieve Shiroma  
California Public Utilities Commission  
505 Van Ness Avenue, Fifth Floor  
San Francisco, CA 94102

**RE: SCE Responses to Questions on SCE's Public Safety Power Shutoff Public Briefing Held August 11, 2020**

Dear President Batjer and Commissioners:

Thank you for your August 27, 2020, letter setting forth the follow-up questions from Southern California Edison's (SCE) Public Safety Power Shutoffs (PSPS) Readiness briefing held August 11, 2020. We appreciate the time you and your staff have dedicated to engaging with SCE representatives so that we may better provide information and work with the Commission, Public Safety Partners, and our customers to address and mitigate the impacts of PSPS events in our communities and our State. With the recent extreme heat conditions across the state, fires in Fresno, Los Angeles and San Bernardino counties, the California Independent System Operator (CAISO) energy emergencies, and SCE's preparation for its largest remote PSPS event anticipated today that could potentially impact over 54,000 customers, SCE understands that customers are counting on power now more than ever as we shelter at home. SCE will continue to listen, learn, and adapt our approach as we strive to continuously improve our handling of PSPS events in 2020.

With this background in mind, SCE provides responses to your questions below.

***Question No. 1: What is the total number of batteries that will be deployed and the timeline to achieve full deployment of the batteries?***

Response to Question No. 1: SCE is planning to have 2,500 back-up batteries to deploy to eligible customers in 2020 (with an additional 201 batteries for new customers in 2021). SCE is contacting customers directly for their interest in participating in the program. When customers respond with interest, they are scheduled for installation through one of SCE's three Energy Savings Assistance (ESA) contractors that support installations. Eligible customers for the program must meet all of the following criteria: enrolled in SCE's CARE or FERA program,

identified as a Critical Care on SCE’s Medical Baseline program, and reside in a Tier 2 or Tier 3 High Fire Risk Area (HFRA). Currently, SCE has approximately 2,100 customers who meet the eligibility requirements to receive the subsidized battery. To date, SCE has delivered 88 batteries to customers and has an additional 251 batteries scheduled to be installed.

As shown below, battery inventory deliveries should increase in September and should be completed by October 2020. The timeline for actual delivery depends upon customer availability and interest and, therefore, SCE can only commit to delivering the batteries by the end of 2020. It is important to note that timeline of installations also depends on customers responding to the outreach letter.

**2020 Battery Inventory Procurement and Manufacturer Delivery Timeline**

Item Description	TOTAL	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20
YETI LI 1400 V2 + BOULDER 200BC	150		150						
YETI LI 3000 V2 + BOULDER 200BC	100			100					
YETI 1500X + BOULDER 200BC	365					365			
YETI 3000X + BOULDER 200BC	1872					1872			
YETI 6000X + BOULDER 200BC	214						214		
<b>TOTAL</b>	<b>2701</b>		<b>150</b>	<b>100</b>		<b>2237</b>	<b>214</b>		

**Question No. 2: A list of the fully ready [Community Resource Centers] CRCs of all types as of the date of this letter, including hard-sided buildings, pop-up tents, and vans. Please provide a comparison to your target numbers of CRCs of all types. For each CRC, provide information on hours of operation, location, services provided, and what changes have been made or are in preparation to be made in response to COVID-19. How many and what type of CRCs will be located close to tribal lands?**

Response to Question No. 2: As of September 2, 2020, SCE has contracted with 52 Community Resource Centers (CRCs). Below is a comparison of SCE’s target numbers for all CRC types. Notably, all 52 contracted CRCs meet the Americans with Disabilities Act (ADA) requirements and six of these CRCs are Independent Living Centers (ILCs). These ILCs have pre-established relationships with the community and their expertise in serving people with Access and Functional Needs (AFN) needs is an added benefit. SCE continues to work with local governments and communities to increase site location and operating hours to meet CPUC

guidelines. Attachment A to this letter contains more detailed information on each CRC’s hours of operation, location, and services provided.

Type	WMP Target Count	Actual Account
Brick & Mortar	35 CRCs by 2020	52 contracted to date, 39 can operate 8am-10pm
Pop-Ups	As needed	As needed
Vehicles	8	8

**Types and number of CRCs to be located close to tribal lands:** Of the 52 contracted CRCs, eight CRCs are close to the Paiute, Morongo, and San Manuel tribal communities. The 52 includes a recent agreement with Tule River Tribe to operate three CRCs. These CRCs are intended to be brick and mortar but may be converted to outdoor drive-throughs or outdoor booths depending on space and site operator comfort level. Active discussions are underway to establish CRCs to support the Paiute Tribe in Bishop, CA.

For some of the more rural or remote CRCs where comparable services may not be available nearby, SCE is preparing to proactively perform panel upgrades and/or transfer switch installations so that these sites can accommodate backup generation. In case of a PSPS event where one of these CRCs may be subject to de-energization, SCE may deploy mobile generators to ensure the availability of power, goods and services.

**Changes to CRCs in response to COVID-19:** SCE has implemented COVID-19 protections at CRCs and Community Crew Vehicles (CCVs) during actual PSPS events in June 2020. Services for both CRCs and CCVs are provided while maintaining physical distancing and include a drive-through and no-contact cell phone charging capability as space permits. SCE offers pre-packaged Customer Resiliency Kits that include PSPS information,<sup>1</sup> light snacks, water, small resiliency devices, and personal protective equipment (PPE)<sup>2</sup> for customer use at the CRCs and CCVs.

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<sup>1</sup> PPS Fact Sheets & Preparedness Info includes customer Survey, CARE/FERA Application Form/Brochure, Back Up Generator Fact Sheet, Community Resource Guide, COVID-19 Customer Care Responses Fact Sheet, Marketplace Fact Sheet, Medical Baseline Application (Corp. Forms), Medical Baseline Brochure (Corp. Forms), Outage Guide for Residential Customers, PPS Decision Marking Factors Fact Sheets, Single-Family Affordable Solar Home brochure (GRID Alternatives to ship to SCE), and Customer Care Programs Fact Sheet.

<sup>2</sup> Customer PPE pouch contains hand sanitizer gel packets, towel disinfectant wipes, anti-fog wipes, disposable masks, fabric mask, and disposable gloves.

SCE staff and customers visiting the CRCs and CCVs are required to wear facial coverings, practice physical distancing, and follow other appropriate precautions necessary based on COVID-19 pandemic protocols. Staff is also required to complete a health assessment prior to reporting to duty and carpooling is not permitted. The PSPS preparedness information shared at the in-person CRCs and CCVs are also available virtually on our website at [www.sce.com](http://www.sce.com). Customers can visit [www.sce.com/psps](http://www.sce.com/psps) to find activated CRC and CCV sites during PSPS events.

### ***Tribal Community Resource Centers***

Most of the Tribes within SCE's service area that may be impacted by PSPS are near locations that are not expected to be impacted by PSPS, thus allowing tribal residents to access nearby services that remain energized. SCE has requested the Tribes that may be impacted by PSPS to participate as CRCs. Two of the ten Tribes that may be impacted by PSPS have agreed to participate as CRCs: Tule River Indian Tribe and Bishop Paiute Tribe. On September 2, 2020, SCE entered into a final agreement with the Tule River Indian Tribe to operate three sites as CRCs, which will operate from 8am-10pm.<sup>3</sup> For those Tribes that did not agree to serve as a CRC, SCE will work with the Tribe and local government to identify a location to serve the Tribe as needed.

### ***Question No. 3: An update on your company's consultation with rural residents who depend on well water powered by electricity.***

Response to Question 3: During SCE's 2019 and 2020 Wildfire Mitigation Plan (WMP) Community Meetings, SCE received feedback from community members of Acton and Agua Dulce regarding their inability to access well water for home and livestock use, during de-energization.

Since June 11, 2020, SCE is offering a generator rebate in the amount of \$300 to non-income qualified customers and \$500 to income-qualified customers who are dependent on well water pumping in High Fire Risk Areas (HFRA), such as those living in Acton and Agua Dulce. These offerings are available on SCE Marketplace.<sup>4</sup>

More recently, SCE received additional feedback in follow-up meetings from customers who receive their water from smaller local water providers who do not have sufficient resiliency to maintain their ability to provide water during a power outage. We also learned that many

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<sup>3</sup> The three sites include the Elders Building, Justice Center and the Tribal Administrative Building.

<sup>4</sup> SCE informed the Commission of this modification to its 2020-2022 WMP Customer Resiliency Equipment Incentives initiative in its June 1, 2020 Off Ramp Report advice letter (Advice 4222-E).

individual homes with wells require larger generators to power larger pumps to move water. As a result of these new findings, SCE is looking into introducing additional rebates for even larger generators. SCE is also reaching out to small water providers to understand their business and resiliency strategies and to explore potential options to support their resiliency needs.

***Question No. 4: An update on your company's consultation with tribal governments, especially on how to improve communication and coordination for the restoration of power after a PSPS event.***

Response to Question No. 4: Since 2018, SCE has regularly engaged with Tribal staff about the PSPS de-energization process and how the Company will communicate and coordinate during outages. As discussed in more detail below, SCE's recent outreach included multiple Tribal workshops, including PSPS Tribal Nations Workshops held in June 2020.

By way of background, SCE service territory includes 13 federally recognized Native American Tribes. SCE has Tribal liaison representatives from Local Public Affairs and Customer Service responsible for assuring that SCE has regular communications with the Tribes. Of the 13 Tribes, ten have service accounts that have been designated as located in Tier 2 or Tier 3 HFRA. During PSPS events, Tribal governments receive the same PSPS notifications (72-hour, 48-hour, 24-hour, etc.) as SCE's Public Safety Partners. SCE's dedicated Tribal liaisons follow up with the affected Tribe(s) with a personalized email that includes impacted circuits and related tribal (business) service accounts. Throughout the event, SCE's Tribal liaisons provide both automated and personalized email updates. If the circuit is de-energized, SCE continues to correspond by email and/or by phone to address any questions from Tribal staff or elected leaders. Each impacted Tribe will receive ongoing alerts throughout the PSPS and re-energization processes.

***Recent Outreach and Education***

As with the cities and counties in SCE's service area, SCE provides annual reliability reports to the 13 Tribes. SCE also meets with each of Tribes to review the previous year's reliability for the circuits that serve the Tribe. This meeting includes local SCE district management and engineering so that they can assist in explaining what improvements were completed to their circuits last year and what is planned for the upcoming year. PSPS protocols are also reviewed during these meetings.

On June 12 and June 26, 2020, SCE held PSPS Tribal Nations Workshops. All 13 Tribal nations were invited to learn about SCE's 2020-2022 WMP and PSPS as well as tips for preparing their own resiliency plans, updating customer contacts, and various programs that the Tribes and their members can utilize to better prepare for a PSPS event. The California Office of

Emergency Services (Cal OES) Tribal Team and the Environmental Protection Agency (EPA) Tribal team were also invited to the workshops and presented on Tribal resiliency.

Below are additional efforts SCE has made on outreach and education with our Tribal partners:

- SCE participated in Cal OES' Statewide Tribal Tac-G calls during PSPS events to provide updates to Tribal audiences on the current PSPS event. Daily email tribal status updates will be provided to the CalOES Tribal team during PSPS events.
- SCE held a PSPS Water Resiliency Workshop for Water and Tribal customers on February 4, 2020.
- SCE conducted Tribal tours of the SCE Emergency Operations Center in March 2020. Tours are currently suspended due to COVID-19 restrictions.
- SCE participated in an EPA Southern California Tribal Water Systems PSPS Workshop on September 3, 2020.
- E-mail campaigns and follow up to the Tribes to update and provide accurate PSPS and emergency contacts.
- E-mail campaigns and follow up to the Tribes on COVID-19 and PSPS concerns.

### ***Restoration of Power***

SCE is not aware of any communication and coordination issues for the restoration of power on Tribal lands within its service area. SCE personnel maintain close contact with Tribal officials during the PSPS events and keep them updated on the de-energization. As Public Safety Partners, Tribal governments receive the same restoration notification and information as other Public Safety Partners. In 2020, SCE is sending imminent de-energization and re-energization notifications to all Public Safety Partners, including tribal governments. SCE is always open to hearing concerns and recommendations on ways to improve communication and coordination with Tribes within its service area.

***Question 5: An update on your company's outreach to people who have self-identified as having a disability, and how your notification protocols will be improved for this additional group, pursuant to the requirement in Commission Decision 20-05-051.***

Response to Question 5: SCE has conducted outreach campaigns that aim to reach all customers using the channels and the language preferences they select and is mindful when developing campaigns to consider the diverse and unique needs within its customer population. Outreach will continue to engage our communities, including our most vulnerable populations such as those with Access and Functional Needs through partnerships with trusted agencies like ILCs, Community-Based Organizations (CBOs), local county services, and those agencies that serve SCE's indigenous populations. In 2020, SCE has held nine online livestream community meetings on its 2020-2022 WMP for customers in HFRA and areas that were significantly

impacted by PSPS last year. These meetings were recorded and include closed captioning and American Sign Language (ASL) translation.

SCE has partnered with a number of external agencies to support the AFN community such as a statewide AFN council that will aid in amplifying the needs of vulnerable populations, ILCs that conduct outreach to AFN communities, agencies that serve indigenous populations to enhance outreach, and 211 agencies to promote and connect to local county services.

During a PSPS activation, SCE contacts local CBOs near potential de-energization areas, so the CBOs can provide outreach to their local constituents. SCE has approximately 1,600 CBOs in its network.

Dating back to 2014, SCE has been allowing customers to self-certify if there is a vulnerability in the home that could arise should service be disconnected. This includes customers who are requesting Medical Baseline (MBL) applications as well as those whose conditions may not qualify them for the MBL program. People with disabilities, chronic conditions, cancer, and those recovering from surgical procedures are among the many that are eligible to receive this designation.

***Question 6: An update on your company's outreach and relationship-building with people and communities in farmworker communities where prevalent languages such as Hmong, Mixteco, Yaqui and Triqui are spoken.***

Response to Question 6: SCE has not done any wildfire or PSPS-related outreach or communications in Hmong, as SCE did not previously identify it as one of the prevalent languages in its service area. In response to CPUC Decision 20-03-004, which adopted requirements for investor owned utilities to conduct community awareness and public outreach before, during and after a wildfire in all languages that are prevalent in their service territory, SCE submitted Advice Letter 4215-E, "Southern California Edison Company's Response to Ordering Paragraph 1 of Decision 20-03-004" on May 15, 2020, which identified 15 prevalent languages (excluding English). Hmong was not identified as a prevalent language as part of that group. However, the Administrative Law Judge's ruling in response to Decision 20-03-004, recently issued on August 21, 2020, requests SCE to include Hmong as one of the prevalent languages. As with the other prevalent languages within our service area, SCE will follow the same overall approach and methods to conduct wildfire-related community awareness and public outreach for Hmong.

SCE has a longstanding grant partnership with the Mixteco/Indigena Community Organizing Project (MICOP) and is relying on this partnership to accurately translate PSPS outreach materials in Mixteco, Zapoteco, and Purepecha, which were identified as the predominant



indigenous languages in SCE’s service area. In late 2019, SCE enhanced its grant partnership with MICOP to educate community members in Ventura County about emergency preparedness and PSPS in Spanish, Mixteco, Zapoteco and Purepecha. MICOP is also using their local radio station, Radio Indigena 94.1 FM, to deliver public service announcements (PSAs) on emergency preparedness and PSPS in these languages. PSAs began airing in February 2020 and are expected to run through the duration of the grant period ending in fall 2020. MICOP also began coordinating in-person outreach with community members through events such as MICOP’s monthly community meetings, health fairs, and local school events. These in-person meetings occurred prior to the COVID-19 stay-at-home orders and MICOP has since modified its outreach methods to direct phone calls.

Yaqui and Triqui were not previously identified by SCE as indigenous languages spoken in our service area. SCE was recently informed by MICOP of potential other indigenous languages that may be spoken in SCE’s service area, including Nahuatl, Huave, Otomi and Maya. SCE is currently working with MICOP to identify the locations of the communities where these languages are spoken, the approximate number of individuals/families that speak the language, as well as the recommended outreach approach. SCE will include Yaqui and Triqui as part of this assessment. Should this assessment determine that these languages occupy significant roles in California’s agricultural economy within our service area, SCE will likely need to either assist MICOP through additional funding to expand its capabilities (as MICOP currently does not have resources that speak these languages) or try to identify and develop partnerships with other Community-Based Organizations that have these capabilities.

Lastly, as requested, SCE held a briefing with CPUC staff on September 3, 2020, to further address questions that came up during SCE’s briefings. We discussed SCE’s medical baseline and critical care customer databases, backup power for telecommunications facilities, and creating public maps with sufficient contrast for persons with vision disability.

In closing, we acknowledge and share the desire of local governments and public officials to protect our communities at this difficult time and always. We are grateful for your leadership on these issues and we look forward to working with you, your staff, county agencies and the many local government partners to better serve SCE’s customers.

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We welcome any additional questions and are willing to further elaborate on any information provided in this letter.

Sincerely,



Kevin M. Payne

Cc:

Service Lists for: R.18-12-005 and I.19-11-013

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**Attachment A: Complete List of Community Resource Centers as of September 2, 2020**

#	County	Facility Name	Street	City	Zip Code	Hrs of Operation
1	Kern	Alpine Forest Park Property Owners' Association	18900 Alps Dr.	Tehachapi	93561	8am - 10pm
2	Kern	Golden Hills Community Center	21415 Reeves St.	Tehachapi	93561	8am - 10pm
3	Kern	Stallion Springs Community Center	27800 Stallion Springs Dr.	Tehachapi	93561	8am - 10pm
4	Los Angeles	Acton Community Center	3748 Nickels St.	Acton	93510	8am - 10pm
5	Los Angeles	Agua Dulce Women's Club	33201 Agua Dulce Canyon Rd.	Agua Dulce	91390	8am - 10pm
6	Los Angeles	Service Center for Independent Life	107 S Spring St.	Claremont	91711	8am - 10pm
7	Los Angeles	Disability Community Resource Center	12901 Venice Blvd.	Los Angeles	90066	8am - 10pm
8	Los Angeles	AERO Institute	38256 Sierra Highway	Palmdale	93550	8am - 10pm
9	Los Angeles	Element Palmdale	39325 Trade Center Dr.	Palmdale	93551	8am - 10pm
10	Los Angeles	Marie Kerr Park (Recreation Center)	2723-A Rancho Vista Blvd.	Palmdale	93551	8am - 10pm
11	Los Angeles	Palmdale Oasis Park and Recreation Center	3850 E. Ave. S	Palmdale	93550	8am - 10pm
12	Los Angeles	Las Palmas Park	505 S Huntington Street	San Fernando	91340	8am - 10pm
13	Los Angeles	San Fernando Recreation Center	208 Park Avenue	San Fernando	91340	8am - 10pm
14	Los Angeles	College of the Canyons - Canyon Country Campus	17200 Sierra Hwy.	Santa Clarita	91351	8am - 10pm
15	Los Angeles	Residence Inn	25320 The Old Rd.	Stevenson Ranch	91381	8am - 10pm
16	Mono/Inyo	Tri-County Fairgrounds	475 Sierra St.	Bishop	93514	8am - 10pm
17	Riverside	Family Service Association	50390 Carmen Ave	Cabazon	92230	8am - 10pm
18	Riverside	Idyllwild Community Center	25925 Cedar St.	Idyllwild	92549	8am - 10pm
19	San Bernardino	Lake Gregory Community Center	24740 San Moritz Way	Crestline	92325	8am - 10pm
20	San Bernardino	Jessie Turner Health and Fitness Community Center	15556 Summit Ave, Fontana, CA 92336	Fontana	92335	8am - 10pm
21	San Bernardino	Jacobson Hall/Lytle Creek Community Center	14082 Center Street	Lytle Creek	92358	8am - 10pm
22	San Bernardino	Neighborhood Partnership Housing Services	9551 Pittsburgh Ave.	Rancho Cucamonga	91730	8am - 10pm
23	San Bernardino	Robert Hootman Senior / Community Center	2929 Running Springs School Rd.	Running Springs	92391	8am - 10pm
24	San Bernardino	Rolling Start	1955 S. Hunts Lane, #101	San Bernardino	92408	8am - 10pm
25	San Bernardino	San Bernardino International Airport	105 N Leland Norton Way	San Bernardino	92408	8am - 10pm
26	San Bernardino	Twin Peaks Recreation Complex	675 Grandview Rd.	Twin Peaks	92391	8am - 10pm
27	San Bernardino	Rolling Start	16519 Victor St., #406	Victorville	92395	8am - 10pm
28	Santa Barbara	Courtyard	401 Storke Rd.	Goleta	93117	8am - 10pm
29	Santa Barbara	Residence Inn	6350 Hollister Ave.	Goleta	93117	8am - 10pm
30	Santa Barbara	Franklin Community Center	1136 E. Montecity St.	Santa Barbara	93103	8am - 10pm
31	Santa Barbara	Louise Lowry Davis Center	1232 De La Vina Street	Santa Barbara	93101	8am - 10pm

32	Tulare	Tule River Justice Center	129 S. Reservation Rd.	Porterville	93257	8am - 10pm
33	Tulare	Tule River Tribal Administration Building	340 N. Reservation Rd.	Porterville	93257	8am - 10pm
34	Tulare	Tule River Tribal Elders Building	217 S. Reservation Rd.	Porterville	93257	8am - 10pm
35	Tulare	Three Rivers Veterans Memorial Building	43490 Hwy 190	Three Rivers	93271	8am - 10pm
36	Ventura	Boys & Girls Club of Moorpark	200 Casey Rd.	Moorpark	93021	8am - 10pm
37	Ventura	Santa Paula Community Center	530 W Main St.	Santa Paula	93060	8am - 10pm
38	Ventura	Boys & Girls Club of Simi Valley	2850 Lemon Dr.	Simi Valley	93064	8am - 10pm
39	Ventura	Courtyard	191 Cochran St.	Simi Valley	93065	8am - 10pm
40	Kern	Sears Hometown	835 Tucker Rd. #A and B	Tehachapi	93561	8am - 6pm
41	Los Angeles	Disabled Resources Center	2750 E Spring St. Ste. 100	Long Beach	90806	8am - 6pm
42	Los Angeles	Sears	1345 W Ave P	Palmdale	93551	8am - 6pm
43	Los Angeles	Sears	3801 E Foothill Blvd.	Pasadena	91107	8am - 6pm
44	Los Angeles	Sears	22100 Hawthorne Blvd.	Torrance	90503	8am - 6pm
45	Mono/Inyo	Sears Hometown	1361 Rocking W Dr.	Bishop	93514	8am - 6pm
46	Orange	Sears	2100 N Tustin St.	Orange	92865	8am - 6pm
47	Riverside	Sears Hometown	49693 Harrison St.	Coachella	92235	8am - 6pm
48	San Bernardino	Sears	8250 Day Creek Blvd.	Rancho Cucamonga	91739	8am - 6pm
49	Kern	Fairfield Inn & Suites	422 W Tehachapi Blvd.	Tehachapi	93561	8am - 8pm
50	San Bernardino	AmPAC Business Capital	22365 Barton Rd.	Grand Terrace	92313	8am - 8pm
51	Santa Barbara	Independent Living Resource Center	423 W Victoria St.	Santa Barbara	93101	8am - 8pm
52	Ventura	Ventura Beach Marriott	2055 Harbor Blvd.	Ventura	93001	8am - 8pm