PUBLIC UTILITIES COMMISSION 505 Van Ness Avenue San Francisco CA 94102-3298



Pacific Gas & Electric Company ELC (Corp ID 39) Status of Advice Letter 4249G/5827E As of September 21, 2020

Subject: PG&E's Community Wildfire Safety Outreach Workplan

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CPUC Contact Information:

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PUBLIC UTILITIES COMMISSION 505 Van Ness Avenue San Francisco CA 94102-3298



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From: Energy Division PAL Coordinator

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Erik JacobsonDirector
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Fax: 415-973-3582

May 15, 2020

Advice 4249-G/5827-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: PG&E's Community Wildfire Safety Outreach Workplan

Purpose

Pursuant to the Administrative Law Judge Ruling issued May 14, 2020, utilities are required to submit a Tier 1 Advice Letter in order to comply with Ordering Paragraph (OP) 1¹ of Commission Decision (D). 20-03-004. Additionally, OP 22 of the same Decision requires utilities to file and serve "No later than 60 days following issuance of this decision...a budget and workplan for the community outreach required by this decision." In accordance with OP 1 and OP 22, Pacific Gas and Electric Company provides its Community Wildfire Safety Outreach Workplan and Budget ("Workplan"), which includes its determination of prevalent languages within its service territory, in Attachment A to this Advice Letter.

Background

On March 18, 2020, the California Public Utilities Commission ("CPUC" or "Commission") issued D.20-03-004, which provides a number of new requirements for electrical corporations to conduct outreach to communities and the public before, during and after a wildfire in all languages "prevalent" in their respective service territories. As described in the Decision, a language is "prevalent" if it is spoken by 1,000 or more

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¹ D.20-03-004, OP 1: "No later than May 15, 2020, each Investor Owned Utility (IOU) and Small and Multi-Jurisdictional Utility (SMJU) shall demonstrate to the Commission's satisfaction that it conducts community awareness and public outreach before, during, and after a wildfire in any language that is "prevalent" in its service territory or portions thereof. A language is "prevalent" if it is spoken by 1,000 or more people in the affected IOU's or SMJU's service territory. Such languages shall include languages spoken by indigenous communities, such as Mixteco and Zapoteco, spoken by indigenous people that occupy significant roles in California's agricultural economy regardless of prevalence. An IOU or SMJU may conduct outreach in languages that are less prevalent at its option, but prevalent languages are a minimum requirement for all IOUs and SMJUs."

² D.20-03-004, OP 22.

persons in the territory of an Investor Owned Utility (IOU) or Small or Multijurisdictional Utility (SMJU). The utilities are responsible for determining which languages are prevalent in accordance with the guidance set forth in the Decision.

In accordance with OP 22 of this Decision, Pacific Gas and Electric Company (PG&E) outlines its Community Wildfire Safety Program (CWSP) Outreach Workplan and Budget ("Workplan"). Additionally, in accordance with OP 1, which indicates PG&E "shall demonstrate to the Commission's satisfaction" that it conducts community awareness and public outreach before, during and after a wildfire in any language that is "prevalent" within its service territory, this Workplan also provides PG&E's language translation strategy to reach customers that meet this criteria before, during and after a wildfire (and a PSPS event). PG&E also describes their approach in determining "prevalent" languages in its territory that will be used in its community outreach language translation strategy based on the provided definitions³ and data sources⁴ suggested in D. 20-03-004.

In Attachment A, PG&E provides its Wildfire Outreach Workplan and Budget, including its approaches for providing translated communications to its customers and the public before, during and after a wildfire.

Protests

Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than June 4, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division ED Tariff Unit 505 Van Ness Avenue, 4th Floor San Francisco, California 94102

Facsimile: (415) 703-2200

E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

⁴ OP 4, 6, 7, 8, 9 and 13

³ OP 1 and 2

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582 E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.1, and OP 1 of D. 20-03-004, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is May 15, 2020.

<u>Notice</u>

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.18-10-007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: http://www.pge.com/tariffs/.

/S/
Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.18-10-007

Wildfire Safety Division (wildfiresafetydivision@cpuc.ca.gov)





California Public Utilities Commission

ADVICE LETTER



LINLINGTOTILIT	CAU
MUST BE COMPLETED BY UT	ILITY (Attach additional pages as needed)
Company name/CPUC Utility No.: Pacific Gas at	nd Electric Company (ID U39M)
Utility type: LEC LEGAS WATER PLC HEAT	Contact Person: Kimberly Loo Phone #: (415)973-4587 E-mail: PGETariffs@pge.com E-mail Disposition Notice to: KELM@pge.com
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas WATER = Water PLC = Pipeline HEAT = Heat WATER = Water	(Date Submitted / Received Stamp by CPUC)
Advice Letter (AL) #: 4249-G/5827-E	Tier Designation: 1
Subject of AL: PG&E's Community Wildfire Safety Keywords (choose from CPUC listing): Compliant AL Type: Monthly Quarterly Annu-	ice
D.20-03-004	on order, maicate relevant beessori, kesolotion #.
Does AL replace a withdrawn or rejected AL? I	
Summarize differences between the AL and th	e prior withdrawn or rejected AL:
	✓ No nation: vailable to appropriate parties who execute a ontact information to request nondisclosure agreement/
Requested effective date: 5/15/20	No. of tariff sheets: $_{ m 0}$
Estimated system annual revenue effect (%): N	·
Estimated system average rate effect (%): N/A	N.
When rates are affected by AL, include attach (residential, small commercial, large C/I, agrical)	nment in AL showing average rate effects on customer classes ultural, lighting).
Tariff schedules affected: $_{ m N/A}$	
Service affected and changes proposed $^{1:}$ $_{ m N/A}$	1
Pending advice letters that revise the same ta	iff sheets: $_{ m N/A}$

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division Attention: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102

Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson

Title: Director, Regulatory Relations

Utility Name: Pacific Gas and Electric Company Address: 77 Beale Street, Mail Code B13U

City: San Francisco, CA 94177

State: California Zip: 94177

Telephone (xxx) xxx-xxxx: (415)973-2093 Facsimile (xxx) xxx-xxxx: (415)973-3582

Email: PGETariffs@pge.com

Name:

Title:

Utility Name:

Address:

City:

State: District of Columbia

Zip:

Telephone (xxx) xxx-xxxx: Facsimile (xxx) xxx-xxxx:

Email:

Attachment A

Wildfire Outreach Workplan and Budget

Pacific Gas and Electric Company (PG&E) Wildfire & Public Safety Power Shutoff (PSPS) Outreach Workplan and Budget

A supplement to PG&E's 2020-2022 Wildfire Mitigation plan, including Outreach in Languages Prevalent in PG&E's Territory



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1 Introduction

On March 18, 2020, the California Public Utilities Commission ("CPUC" or "Commission") issued Decision (D). 20-03-004 ("Decision"), which provides a number of new requirements for electrical corporations to conduct outreach to communities and the public before, during and after a wildfire in all languages "prevalent" in their respective service territories. As described in the Decision, a language is "prevalent" if it is spoken by 1,000 or more persons in the territory of an Investor Owned Utility (IOU) or Small or Multijurisdictional Utility (SMJU). The utilities are responsible for determining which languages are prevalent in accordance with the guidance set forth in the Decision.

In accordance with Ordering Paragraph (OP) 22 of this Decision, Pacific Gas and Electric Company (PG&E) outlines its Community Wildfire Safety Program (CWSP) Outreach Workplan and Budget ("Workplan"). Additionally, in accordance with OP 1, which indicates PG&E "shall demonstrate to the Commission's satisfaction" that it conducts community awareness and public outreach before, during and after a wildfire in any language that is "prevalent" within its service territory, this Workplan also provides PG&E's language translation strategy to reach customers that meet this criteria before, during and after a wildfire (and a PSPS event). PG&E also describes their approach in determining "prevalent" languages in its territory that will be used in its community outreach language translation strategy based on the provided definitions and data sources suggested in D. 20-03-004.

This Workplan described herein supplements and details the incremental communications and outreach-related plans described in PG&E's 2020-2022 Wildfire Mitigation Plan. Additionally, as required by D.19-07-015 OP14, the new languages identified in this Workplan based on the guidance set forth in D.20-03-004 will be used in other relevant proceedings, including the Disaster Relief Rulemaking (R.) 18-03-011. PG&E's Advice Letter 4139-G/5630-E describes the Consumer Protections Language Requirements that PG&E implements before, during, and after a disaster. PG&E intends to continue to leverage that plan as described and will adopt the additional languages identified based on the Commission's definition of prevalence in this proceeding.

The following report describes PG&E's approach for identifying prevalent languages in its territory based on D.20-03-004, the communication and outreach channels that will be leveraged before, during and after wildfire and/or PSPS event, as well as the associated translations progress and plans. Additionally, PG&E describes the approaches for evaluating its outreach plan as described herein. Finally, PG&E proposes a budget for the annualized costs of these efforts described in this report.

¹ OP 1 and 2

² OP 4, 6, 7, 8, 9 and 13

2 Language Prevalence Identification in PG&E's Service Territory

2.1 Definition of Language Prevalence

In the Decision, the Commission directs that all electrical utilities conduct outreach to communities and the public before, during and after a wildfire in all languages "prevalent" in their respective service territories. In accordance with OP 1 and 2, a language is "prevalent" if:

- It is spoken by 1,000 or more people in the affected service territory (based on identified data sources);
- It is spoken by indigenous communities that occupy significant roles in California's agricultural economy, regardless of prevalence, such as Mixteco and Zapoteco; and
- It is required by statute, regardless of prevalence, which include English, Spanish, and top three languages: Chinese, Tagalog and Vietnamese, as well as Korean and Russian (where prevalent). To note, these languages PG&E has already adopted for translated support for wildfire and PSPS communications.

Each utility is responsible for determining which languages are considered prevalent within their territory with the guidance set forth by the Decision.

2.2 Identification of Language Prevalence

To determine prevalent languages in PG&E's territory, PG&E coordinated with the other Investor Owned Utilities (IOUs) to align on the methodology and data sources to identify the prevalent languages within its service territory. PG&E used the criteria and data sources proposed by the CPUC in the Decision to establish what languages would be used for wildfire and PSPS-related communications. Table 1 below outlines the data sources used and associated ordering paragraphs from the Decision that authorizes the use of these sources.

Table 1. Data Sources to Determine Language Prevalence 3

Data Source		Ordering Paragraph from D. 20-03-004
Primary Source	American Community Survey (Table C16001)	OP 4
Secondary Source	California Complete Count	OP 6
Secondary Source	Hard to Count	OP 6
Secondary Source	US Census Data	OP 6
Internal Source	PG&E Historical Language Call Volume Data	OP 8
Secondary Source	Community Based Organization Feedback	OP 8

³ Effort conducted to comply with D. 20-03-004 Ordering Paragraph 1, 4, 6, 7, 9, 13

2.2.1 American Community Survey Data

As stated in OP 4, "to identify prevalent languages, the Investor Owned Utilities and Small and Multi-Jurisdictional Utilities shall use American Community Survey and their own data in accordance with the process in Appendix A."

The guidelines to determine language prevalence in Appendix A ultimately pointed to a five-year data set as of 2018 from the American Community Survey. This included the top 12 non-English language *categories* in California based on Languages spoken at home for the population 5 years and over and are identified within PG&E's service territory with 1,000 people or more that speak English less than very well. This data set included the below 12 categories -- six of these categories were bundled or other language categories with multiple or indistinct languages included in the data set (marked with an asterisks):

- 1. Spanish
- 2. Chinese
- 3. Vietnamese
- 4. Korean
- 5. Tagalog (incl. Filipino)
- 6. Arabic
- 7. Russian, Polish, other Slavic languages*

- 8. French, Haitian, or Cajun*
- German or other West Germanic languages*
- 10. Other Indo-European languages*
- 11. Other Asian and Pacific Island languages*
- 12. Other and unspecified languages*

Of these languages, Arabic was a new language included in this data set that was not "bundled" with other languages, which PG&E has not already adopted for translations. As authorized by OP 6, PG&E could leverage "United States Census data as well as the data sources suggested by California Environmental Justice Alliance ("California Complete Count," and "Hard to Count" data) if American Community Survey data is not sufficient in determining languages spoken in the target area." Given some of the language categories were bundled with multiple languages in the American Community Survey Data, PG&E and the IOUs jointly determined this data set was not entirely sufficient to determine prevalence. Therefore, PG&E supplemented the determination of language prevalence using secondary data sources suggested by the CPUC, including California Complete Count (based on US Census data), PG&E internal data, and CBO input.⁵

2.2.2 California Complete Count

Since the American Community Survey Data was not entirely sufficient given some of the languages were bundled into categories of languages, PG&E leveraged data from California Complete Count.⁶ In May 2019, the California Complete Count issued a report titled "Language"

⁴ In compliance with OP 1, American Community Survey U.S. Census Bureau data portal at data.census.gov "Language spoken at home for the population 5 years and over" table c16001

⁵ PG&E ruled out the use of the Hard to Count data, since the data set found only included four bundled categories of languages: Spanish, Indo European, Asian Pacific, Other.

⁶ California Complete Count. *Language and Communication Access Plan.* PDF file. May 17, 2019. https://census.ca.gov/wp-content/uploads/sites/4/2019/06/LACAP.pdf

and Communication Access Plan" that identified the top 12 non-English language groups spoken in California, which uses the U.S. Census Bureau American Community Survey 2013-17 estimates. California's top 12 languages included:

1. Spanish

2. Chinese (including Cantonese and Mandarin)

3. Vietnamese

4. Tagalog (including Filipino)

5. Korean

6. Armenian

- 7. Farsi
- 8. Arabic
- 9. Russian
- 10. Japanese
- 11. Punjabi
- 12. Khmer

Of these 12 languages, one language (Armenian) was not included as a primary⁷ (top) language within any PG&E county. Additionally, PG&E determined that Filipino was a close dialect to Tagalog, and therefore does not need to be translated separately. Ultimately, based on this data set from California Complete Count, PG&E adopted four additional languages to be included in its wildfire and PSPS communications: Farsi, Japanese, Punjabi, and Khmer. To add, this data set reinstated the need for the one new language identified from American Community Survey data: Arabic.

2.2.3 PG&E Call Center Data

To supplement and reinforce the two data sets noted above (American Community Survey and California Complete Count), PG&E used 12-month historic call center data. Currently, PG&E's call center provides customers with a service to access translated customer support in over 250 languages (see Appendix 1, which provides a list of all languages offered in PG&E's call center for translation services). In the twelve months from April 2019 to March 2020, PG&E provided customer support translations through the call center in 80 different languages (see Appendix 2 to view total counts by languages used in the call center). Using the secondary data suggested by the CPUC (American Community Survey and California Complete Count), PG&E's call center data confirmed that the proposed additions are aligned with the top uses for its call center translation services.

2.2.4 Third Party Input to Identify Language Prevalence, Suggest Channels of Outreach, and Recommend CBOs Partnerships

In accordance with OP 8 and 13, PG&E engaged with CBOs and other utilities to determine how they work with CBOs, what languages they recommend be translated, and their suggested channels for reaching customers with limited English proficiency. Furthermore, PG&E has engaged with the People with Disabilities and Aging Council (PWDAAC) – a newly established Access and Functional Needs (AFN) -focused council to gain feedback on the support PG&E provides for its aging and disabled customers. See below for more detail.

⁷ The primary language is defined as the Limited English Proficiency (LEP) non-English native or preferred language.

2.2.4.1 Input from CBOs

In April 2020, PG&E sought feedback from over 200 CBOs to identify language needs in communities within PG&E territory.8 The CBOs engaged serve diverse groups of Californians residing in PG&E's service territory, including seniors, immigrants, people with disabilities, and low income families. They offer a broad range of services including assistance with employment, housing, physical and mental health, food, and financial needs, among others. As part of this effort, PG&E emailed CBO contacts to solicit input on which languages these organizations either (1) currently provided services or assistance in, or (2) believed were needed to support limited English proficiency community members. Additionally, PG&E asked CBOs to provide suggestions on the best channels to communicate to residents with limited English proficiency.

PG&E received responses from over 60 different CBOs. Most of the organizations who responded currently offer services in Spanish. Other languages that respondents believed required support generally aligned with PG&E's planned languages for Wildfire-related communications, including PSPS communications - namely Chinese (Mandarin and Cantonese dialects), Vietnamese, and Tagalog. Some CBOs in the central valley and in northern parts of PG&E territory suggested that communications and services should also be offered in Hmong – a language that based on the primary and secondary data sources PG&E originally identified was not included. Given Hmong was one of the top five languages suggested by the CBOs that PG&E had not planned to include in its wildfire and PSPS communications, PG&E determined it was appropriate to adopt based on the feedback received.

Additionally, a few CBOs serving Spanish speaking residents also noted a need for services and communications in indigenous languages, including Mixteco, Zapoteco, Triqui and Purepecha. Organizations serving the deaf and hearing impaired recommended using American Sign Language interpreters. Some organizations, particularly state and government organizations, contract with Language Line Services (the same vendor as PG&E), or a similar vendor, in order to provide oral translation and interpretation services in a broad range of languages beyond what staff on hand can speak, write, or read.

CBOs that responded to PG&E's inquiry also suggested several communication channels for connecting with community members with limited English proficiency. The most frequently suggested communication channels were in-language social media (including Facebook, Twitter, WhatsApp, and Facebook Messenger), television, community events, phone calls, and text messages. Organizations that served customers with disabilities noted that any communications using audio would also need text capability or captioning, and should ensure that website, web content, forms, and any multimedia is accessible to all.

⁸ Effort conducted in accordance with D.20-03-004 OP 8 Over 200 CBOs were contacted by email in order to solicit feedback

2.2.4.2 Input from People with Disabilities and Aging Council

In 2020, PG&E established the People with Disabilities and Aging Advisory Council (PWDAAC)⁹, which is comprised of a diverse group of recognized CBO leaders that support individuals with developmental, intellectual and/or physical disabilities, chronic conditions, injuries, and older adult communities, as well as members and advocates from within these communities. The Council provides independent expertise to provide input on best practices for PG&E's customer programs, operations, and communications to improve support for these populations now and in the future. In its first meeting held in April 2020, PG&E initiated discussion to obtain input and suggestions from the council on various outreach approaches and communication channels planned by PG&E in 2020.

2.2.4.3 Input from Telecommunications, Water and Transportation Utilities

In April and May of 2020, PG&E solicited input from the telecommunications, water and transportation utilities to understand their CBO engagement strategy for customer outreach and communications. This engagement took place in two ways: (1) PG&E solicited input from transportation and telecommunication providers at PSPS preparedness webinar meetings; and (2) PG&E sent an email survey to all telecommunication, water and transportation providers to solicit their responses. To date, PG&E has not received input from these providers that would influence the scope of their outreach plan. PG&E will continue to seek and accept input, and potential collaboration, to coordinate outreach and communications with these providers.

2.2.5 Input from Parties to the Proceeding

Additionally, in accordance with OP 12, the IOUs have arranged a "meet and confer" with parties to this proceeding to gather input on other additional CBOs that could be employed to assist with community outreach and engagement. PG&E anticipates this will be an iterative, on-going process to continue to gather input from key partners and parties.

3 Prevalent Language Identification Results

Based on the definition of language prevalence and authorized data sources described above, PG&E identified the following 12¹¹ languages to be used for wildfire and PSPS-related communications as described in Section 4 and 5 below. Six of these languages are new. Additionally, based on the direction from the Commission to include languages spoken by indigenous people that occupy significant roles in California's agricultural economy regardless of prevalence, PG&E also includes these languages, such as Mixteco and Zapoteco, which will be served and supported through varying channels described below (e.g. CBO communications and multi-cultural media outlets). These new languages added to PG&E's wildfire and PSPS-related

⁹ Rulemaking 18-12-005 PG&E 2020-2022 Wildfire Mitigation Plan section 4.1.3 Vulnerable Populations (Populations with Access and Functional Needs)

¹⁰ Effort conducted to comply with D.20-03-004 OP 13

¹¹ This Workplan references 12 total languages in written form, and 13 total languages spoken form. This is because Chinese is one language in written form, and two languages in its spoken form: Cantonese and Mandarin.

communications are marked with asterisks below:

1. Spanish 8. Punjabi*

2. Chinese (Mandarin & Cantonese) 9. Farsi*

3. Vietnamese 10. Japanese*

4. Tagalog 11. Khmer*

5. Russian 12. Hmong*

6. Korean 13. Indigenous Languages*

7. Arabic*

Table 2 below provides more detail with the summary results of the analysis used to derive the 12 languages, as well as indigenous languages.

Table 2. Prevalent Language Results Based on Analysis

Languages for Wildfire related including PSPS Communications	American Community Survey Data ¹²	CA Complete Count (>1,000) ¹³	PG&E Live Agent Call Volume Data ¹⁴	CBO Input ¹⁵
Spanish	1,521,937	Yes	699,734	56
Chinese (Mandarin & Cantonese)	348,716	Yes	8,618 11,979	15 15
Vietnamese	157,534	Yes	5,090	16
Tagalog	135,465	Yes	257	13
Russian	58,175	Yes	1,157	6
Korean	44,116	Yes	801	5
Arabic	178,476	Yes	583	3
Punjabi	N/A	Yes	1,303	3
Farsi	N/A	Yes	494	4
Japanese	N/A	Yes	326	2
Khmer	N/A	Yes	226	1
Hmong	N/A	N/A	435	10
Indigenous Languages	N/A	N/A	minimal	5

¹²Includes summary of customers that speak English "less than very well" from table c16001 in PG&E territory

¹³ Includes the languages that were identified to be required based on California Complete Count in PG&E counties

¹⁴ Based on twelve-month historic call volume by languages used for PG&E's translation services

¹⁵ CBO input is based on voluntary responses from over 60 community-based organizations and includes a summary of languages offered and/or needed. These counts do not necessarily include input from California state agencies, who use Language Line translations services to offer oral translation and interpreters in many languages.

PG&E will also provide outreach to customers in American Sign Language (ASL), in order to reach the deaf and hard of hearing community before, during and after a wildfire and PSPS event.

3.1 Lessons Learned from San Joaquin Valley Proceeding

Pursuant to OP 7, the California Environmental Justice Alliance (CEJA) shared lessons learned from the San Joaquin Valley Proceeding (R.18-10-007). PG&E will take into consideration the best practices highlighted from this letter and in this proceeding as it continues to refine its plans for outreach and CBO engagement.

Table 3 below shows key highlights of best practices from this letter and proceeding and how PG&E is incorporating the recommendations:

Table 3. PG&E Actions in Response to San Joaquin Valley Proceeding Best Practices

San Joaquin Valley Proceeding Best Practice Recommendation	PG&E Action
Having a community-led design process to ensure outreach it is effective and accessible	PG&E is actively obtaining input from parties to the proceeding, CBOs directly, and through various advisory councils, including the PDAAC, to gain input on its outreach plans and language translation approaches
Developing and following a community engagement plan	The community engagement outreach plan described herein will be followed
Providing culturally sensitive and locally relevant translated communications	PG&E is seeking input from relevant parties, and intending to leverage their input to provide culturally sensitive and local relevant communications (e.g. working with trusted CBOs locally)
Offering a variety of outreach tactics unique to targeted communities' needs and preferences	As described herein, the outreach tactics provided by PG&E are vast and continues evolve based on lessons learned, feedback, confirmation of effectiveness
Obtaining CBO input on their assessment of outreach submitted to the record	PG&E will include CBOs in their assessment of the effectiveness of its 2020 outreach, and welcome CBOs to share their input to the record (if interested)
Ensuring funding is made available for CBO outreach	PG&E is proposing additional funding to support additional CBO engagement to carry PG&E messages to its customers as authorized in OP 21

4 Channels of Customer and Community Communications and Outreach

In OP3, the Commission provides communication channels that the utilities shall consider using at minimum, including: "radio, broadcast, cable and print earned and unearned media, shareable video or audio content, door-to-door contact, social media and websites, texting and other communications-based methods such as live phone calls, emergency alerts, e-mails, or

¹⁶ Letter on "Best Practices for Outreach from the San Joaquin Valley Proceeding" received via email from Mad Stano on 03/30/20

prerecorded messages to communicate with their customers in-language." PG&E makes a considerable effort to use these channels, among others, and provides more detail regarding each channel used below. PG&E intends to continue to explore additional channels and technologies for communications, while also refining details and scope of implementation to improve content, accessibility, awareness and effectiveness.

4.1 Website

PG&E's website (www.pge.com) allows customers to have access to 24/7 information before, during and after a wildfire and/or PSPS event. PG&E's website provides customers with convenience and flexibility by allowing them access to a variety of topics associated with wildfire related including emergency preparedness (www.pge.com/emergencypreparedness), and PSPS planning and preparedness information (www.pge.com/psps).

To ensure scalability during high volume emergency events, including PSPS events, PG&E recently launched a new, standalone cloud-based website called the "Safety and Alerts Center." The Safety and Alerts Center is located at www.pgealerts.alerts.pge.com, however, consumers do not need to learn this new URL. Whenever there is a high volume event, PG&E will redirect traffic from pge.com over to the standalone site. Once on the new site, users can choose to stay there to get PSPS information or to continue on to pge.com. Additionally, any PSPS event related URLs used in 2019, such as www.pge.com/pspsupdates, will be directed to the new site by default. In addition to having event specific content in English, the alert center currently offers content in 7 languages. Tools such as the address lookup tool and the outage map which were previously only available in English will also be made available in-language later this year. The alerts site allows PG&E to handle traffic spikes while maintaining normal course of business (e.g. customers log into their accounts to view energy statements, pay a bill, submit a service application).

A focused set of "critical" pages, including PG&E's PSPS webpage and the alert microsite, is currently translated in the six original written languages: Spanish, Chinese, Vietnamese, Korean, Tagalog, Russian. ¹⁷ PG&E is currently reviewing all wildfire related, including PSPS web content, to determine which pages align with the critical information/document criteria discussed below in section 4.5. PG&E plans to add the six new languages to the site later this year: Arabic, Farsi, Punjabi, Japanese, Khmer, Hmong.

PG&E will continue to explore and identify improvements for its website based on continued user and messaged testing, feedback from surveys, and more.

4.2 Media Engagement

PG&E works closely with external media outlets, including both paid and earned media, to provide

Spanish: www.pge.com/pspsupdates-zh; Chinese: www.pge.com/pspsupdates-zh; Korean: www.pge.com/pspsupdates-zh; Vietnamese: www.pge.com/pspsupdates-vi.

¹⁷ The following are example translated sites for the PSPS Updates page, which can also be found by clicking the language icon at the top of the screen on the English page:

broad awareness to Californians to share tips related to wildfire and PSPS preparedness, socialize available resources, and communicate PSPS event information.

4.2.1 Earned Media

PG&E engages with the media by issuing press releases, conducting and live streaming news conferences with ASL translators, and participating in media interviews. In turn, these media organizations may provide communications on the radio, broadcast, tv, and online.

To serve customers with limited English proficiency, PG&E engages with over 150 multi-cultural media outlets throughout the year in an effort to promote safety initiatives, including PSPS, to monolingual or difficult to reach populations that may not have access to mainstream television media or read/speak English. See Appendix 3 for a list of these multi-cultural media organizations.

PG&E shares news releases and coordinates interview opportunities with these media outlets to help educate limited English-speaking customers on various PG&E programs, including the Community Wildfire Safety Program (CWSP), Public Safety Power Shutoff (PSPS), emergency preparedness, public safety, income qualified programs, and energy efficiency. Additionally, PG&E scheduled media visits with these organizations to discuss other partnership opportunities (e.g., Public Service Announcement, advertising, event sponsorships). During PSPS events, select media outlets are notified based on their geographic coverage and frequency in running event updates.

When a wildfire and/or PSPS event may be active and PG&E's Emergency Operations Center (EOC) is activated, PG&E staffs bilingual and multilingual employees to serve in the EOC to support the Public Information Officer (PIO) multi-media engagement function. These employees provide urgent translation support, such as verification and approval of ad hoc written translations during emergencies. These staff assist PG&E with avoiding delays that can occur when engaging outside vendors for translation needs during an active event or wildfire.

4.2.2 Paid Media and Advertising

To supplement PG&E's outreach efforts, PG&E runs PSPS emergency messages to reach customers via paid media channels. PG&E purchases a combination of English and in-language radio ads, as well as digital banners in English and multiplate languages based on targeted zip codes. PG&E is in the process of identifying available media outlets to cover the 12 identified languages, and the associated costs, which are variable based on geography and season.

To build customer awareness of its expanded in-language support, PG&E will run a series of print ads across its service territory highlighting its web and call center resources provided in language.

4.3 Social Media

PG&E uses social media, including Facebook,¹⁸ Twitter¹⁹ and NextDoor,²⁰ to direct users to its website where they can access important emergency preparedness information, as well as PSPS

¹⁸ www.facebook.com/pacificgasandelectric/

¹⁹ twitter.com/PGE4Me

²⁰ https://nextdoor.com/agency-detail/ca/san-francisco/pacific-gas-and-electric-company-13/

event resources in their supported language of preference. Using PG&E's social media accounts, PG&E posts key messages from news releases, such as the launch of the Disability Disaster Access & Resources Program,²¹ invitations to wildfire safety and preparedness webinars,²² promoting the Medical Baseline program,²³ and PSPS event updates including Community Resource Center (CRCs)²⁴information. PG&E's social media efforts also include publishing content, including informational preparedness and/or event-specific videos, such as PSPS, processes and insight into frequently asked questions.

4.4 Videos

In addition to the video content that PG&E shares through social media and on its website, PG&E is actively exploring new approaches to inform customers, including the creation of short (30 second) videos, longer 5-minutes videos and an extended 30-minute informational program. These videos will provide a high-level overview of expectations and protocols for PSPS for the territory. Additionally, PG&E will cover content discussed during PG&E webinars, including approaches to mitigate for wildfire risk and how customer can prepare for emergencies. The method in which this content would be delivered is still being determined, and PG&E intends to have initial videos completed by Q3 2020, including translations in prevalent languages for key videos.

4.5 Collateral and Print Material

PG&E is working towards streamlined criteria for translating wildfire related, including PSPS, communications. For 2020, PG&E takes three approaches on translating print media (and web content), such as brochures and fact sheets, including:

- (1) Full translations of "critical information/documents";
- (2) Tagline translations in all 12 languages for non-critical information/documents (unless the primary content has been covered in a key critical document); and
- (3) Language icon and text in English that points customers to PG&E's Language Services Line for non-critical documents (if space is limited).

The criteria for determining the three is more fully described below.

4.5.1 Full Translation of Critical Information/Documents

"Critical Information/Documents" are print materials focused on wildfire and PSPS preparedness and available resources, as well as PSPS notifications. PG&E provides fully-translated educational collateral to support in-person education efforts for customers in their preferred language (where prevalent), and to share with collaborators that help PG&E socialize their messages. See Appendix 4 for a sample of fully translated print collateral.

²¹ https://twitter.com/PGE4Me/status/1255636675939708931

²² https://twitter.com/PGE Paul/status/1255562436230381570

²³ https://twitter.com/PGE4Me/status/1204900971505209344

²⁴ https://twitter.com/PGE4Me/status/1197530202735296513

PG&E is in process of reviewing all current collateral materials to ensure items deemed as "Critical Documents" are available in collateral catalog in all 12 prevalent languages identified. Once in the catalog, those items can be:

- 1. Downloaded as PDFs for electronic distribution (shared with CBOs, affinity groups, etc.); and
- 2. Printed-on-demand where PG&E or third-party representatives can order a batch of printed collateral for events, presentations, and among other engagements.

4.5.2 Tagline Translations for Non-Critical or Supplemental Information/Documents

For non-critical materials (or materials that supplement those that already exist) and there is adequate space in the materials, PG&E will provide one-line translated text referencing the customer to call PG&E and/or view translated content online. Additionally, PG&E will point customers to the contact center for support in over 200 languages using a universally recognizable language translation icon. PG&E has conducted benchmarking to determine the most appropriate and recognizable universal language icon to leverage in these instances. See Figure 1 below for an illustrative example of the tagline translations.

Figure 1. Example of PG&E Tagline Translations

Para ayuda en español por favor llame al 1-866-743-6589 要用粵語/國語請求協助,請致電 1-866-743-6589 Để được giúp đỡ bằng tiếng Việt, xin gọi 1-866-743-6589 한국어로 더 도움을 받으시려면 전화하세요 1-866-743-6589 Para tulong sa Tagalog, mangyari lamang na tumawag sa 1-866-743-6589

Для получения помощи на русском языке, пожалуйста, позвоните по телефону: 1-866-743-6589

口本語でのサポートはこちらまでお電話下さい 1-866-743-6589

مقرب لصت ، قيبر على الشخالات قدع السمل 1-866-743-6589 សម្រាប់ជំនួយជាភាសារខ្មមរែស្ងមទូរស័ព្ទមកលខេ 1-866-743-6589 Yog xav tau kev pab ua hais lus Hmoob, hu rau 1-866-743-6589 ਪੰਜਾਬੀ ਵੀੱਚ ਮਦਦ ਲਈ, ਕਰਿਪਾ ਕਰਕੇ 1-866-743-6589 ਤੇ ਕਾਲ ਕਰੋ نفالت مرامش اب افطل ، يسراف نابز مب رتشيب تاعالطا بسك يارب دي ي امرف ب ل ص اح س امت ١-٨٦٦-٧٤٣



For translated support in over 200 additional languages, please contact PG&E at 1-866-743-6589

4.5.3 Language Icon for Non-Critical or Supplemental Information/Documents

Items that are classified as non-critical or supplemental and with space constraints, will include a universal "icon" and short message in English to provide visual reference to the availability of additional translations through other channels, such as dedicated web pages or by phone through PG&E Call Centers. As mentioned above, PG&E conducted benchmarking to determine a universally recognizable language translations icon to use in these instances. See Figure 2 below for an illustrative example.

Figure 2. Example of Language Icon



For translated support in over 200 languages, please contact PG&E at 1-866-743-6589.

4.6 Live Agent Call Center Support

PG&E operates four contact centers in the state of California and provides 24/7 emergency liveagent service for customers to report emergencies and obtain PSPS-related updates, as needed. PG&E's Customer Support Contact Center agents are trained in how to handle customers dealing with natural gas and electric emergencies with specific procedures to escalate life-threatening situations.

PG&E has the ability to support any additional customers language needs not specified within this plan by calling PG&E's Customer Support Contact Center, which is equipped to translate messaging in over 250 languages, including almost 10 indigenous languages, such as Mixteco, Zapoteco and Triqui. PG&E will continue to leverage PG&E's four Customer Support Contact Centers before, during and after a PSPS event, which offer support by trained agents that handle customer inquiries, including providing translation services available in 250 languages. PG&E may implement the PSPS call strategy, as needed, to ensure elevated service with minimal wait times for PSPS customers during a PSPS event.²⁵

4.7 Customer Notifications

PG&E describes its PSPS event notifications and coordination strategy in PG&E's 2020-2022 Wildfire Mitigation Plan.²⁶ Customer notifications are currently planned for PSPS events and, in the event of a wildfire, may be issued to provide incident-related updates if long-duration outages are anticipated, as well as providing a status of customers' gas and/or electric service.

PG&E is committed to providing notifications to potentially impacted stakeholders in advance of, during and after a PSPS event, as weather permits. The PSPS notification strategy will comply with CPUC rulings. PG&E expanded its notification strategies from 2019 and continues to adjust as the company receives feedback from state and local agencies, as well as its customers. For 2020-2022, PG&E will utilize the strategies below and will modify, as needed, as the company works towards shorter event durations and fewer customers impacted. PG&E will continue to use all communication channels available during an event: direct to customer notifications, media (multi-cultural news outlets, earned and paid media, social media), website, collaboration with Public Safety Partners and CBOs.

PG&E continues to make improvements to the customer notification process and experiences, including translations of the notifications. For 2020, PG&E has redesigned its customer notifications based on a number of feedback sources, including customer research and analysis of digital use, as well as feedback received by customers and partners during and after PSPS events. In its notifications planned for 2020, PG&E will provide more information, sooner directly to customers. Example improvements to the notifications in 2020 include:

²⁵ PG&E 2020-2022 Wildfire Mitigation Plan (Pg. 5-305): "During an event, PG&E will consider implementing the PSPS call strategy, as needed, to ensure elevated service with minimal wait times for customers potentially affected by an active PSPS event customers. The PSPS Call strategy includes maintaining full staffing across Contact Center Operations and training Credit and Billing reps to be able to handle PSPS call types, and only accepting emergency-related calls (including calls related to downed wires, gas leaks, outages and PSPS) when notifications are sent to over 100,000 customers for an active PSPS event."

²⁶ Pg. 5-236 – 5-237

- Notification content in each channel (phone, text email) is more personalized with more eventspecific information, which limits the need for the customer to obtain more event information by visiting PG&E's website or calling PG&E
- Links to resources available for access and functional needs (AFN) populations, separate from Medical Baseline – this is also a key resource link on PG&E's alert site;
- Automated voice calls will include information with up to three impacted locations²⁷;
- Medical Baseline customer notifications have improved instructions and options to acknowledge notification receipt to prevent an in-person visit (referred to as "door knocks");
- Email notifications were re-designed to highlight critical information, including added street/address information, and estimated shutoff and restoration times from the initial contact
- Text messages have increased character counts from 160 to 320 characters to provide more event information (see Figure 3 of changes to the text scripts, which are reflective of the types of changes made to voice and email notifications, as well):

Figure 3. 2019 vs. 2020 Text Sample Notification for Comparison

2019 General Text Message (160 characters) PG&E Safety Alert: Due to weather

PG&E Safety Alert: Due to weather forecast PG&E may turn off power on 9/17. More info: pge.com/pspsupdates

2020 General Text Message (320 characters)

PG&E PSPS Outage Alert 11/21/20: Due to weather PG&E may turn off power for safety at 1234 Mesa Avenue on 11/23/20. Estimated shutoff: 2pm-5pm. Estimated restoration: 11/25/20 by 3pm. Changes in weather can affect shutoff and restoration time. More info: pge.com/pspsupdates

4.7.1 Translation Approach for Customer Notifications

Beyond the improvements made to the customer notifications in English, PG&E is making improvements to the translated notifications that are provided during PSPS events. This process is iterative after just identifying the new additional languages described above. The following describes PG&E's translated automated notification customer experience for multiple channels (phone, text and email):

• Automated Phone Calls: Currently, if the customer has Spanish set as their language preference with PG&E, PG&E will provide the notification in Spanish. Customers without

²⁷ In 2019, customers receiving an automated call were prompted to write down a pin number to visit a web site for details. If they also received a text or email they could simply click to get the same details. Changes are in currently in flight to this process. Automated call recipients will no longer be required to write down a pin number and visit a web site unless the customer has more than three potentially impacted locations. In addition, text and emails have been updated so that address, shutoff time and restoration time are embedded in the communication directly with no need to click for more details.

a language preference and/or if their language preference is set as anything other than Spanish, the initial call will be in English, with a menu options to listen to the call in one of seven different spoken languages: *Spanish, Chinese (both Mandarin & Cantonese), Vietnamese, Russian, Korean, or Tagalog.* At the end of the notification delivered in language, customers would have the option to transfer to PG&E's language line services in its call center if they are seeking more information.

Finally, if the call goes to voicemail, PG&E will leave an automated message. At the end of the message, the customer will be provided the phone number to call and hear the message in another language. If the customer calls the phone number provided, the customer will be presented with an "In Language" menu, after reviewing the current list of language provided they will be presented the option to select for all other languages which will transfer the customer to a Call Center Representative to provide in language assistance with the support of an interpreter.

- Email: If the customer has Spanish set as their language preference, they will receive the email notification in Spanish. Customers without a language preference and/or if their language preference is set as anything other than Spanish, the email will be in English, with the opportunity to click on the language icon at the top of the email to obtain updates in Spanish, Chinese, Vietnamese, Russian, Korean, or Tagalog.
- **Text:** If the customer has Spanish set as a preference, they will receive the text notification in Spanish. If the customer has a preference set as anything other than Spanish, the text will be in English, which points them to PG&E's website that will be translated in Spanish, Chinese, Vietnamese, Tagalog, Russian, or Korean.

Provided the six additional languages were added to the wildfire related including PSPS communications requirements in PG&E's territory, PG&E intends to make these six additional languages available on the key web pages and PSPS emergency website by the end of Q3, in addition to PG&E notifications.

Table 4 below clarifies the languages that will be available by PSPS notification channel, including the website.

Notification Channel	Original 6 Languages: Spanish, Chinese, Tagalog, Vietnamese, Korean, Russian	Expanded List of Languages: Arabic, Punjabi, Farsi, Japanese, Khmer, Hmong
Text	Q2	Q3
Email	Q2	Q3
Automated Calls	Q2	Q3
Web	Q2	Q3

Table 4. PG&Es Notification Deployment Overview

PG&E continues to explore further improvements to the translated customer notifications, such

as prompting customers to update their language preference if they listened to the PSPS notification by utilizing a language selection to listen to the notification.

4.7.2 *PSPS Zip Code Alerts*

PG&E provides opt-in alerts for non-PG&E account holders to sign up for pre-deenergization notifications based on zip codes. Anyone could choose to sign up for PSPS Zip Code Alerts, which is especially useful for tenants, caretakers, travelers, parents of school-age children and other non-account holders. Once notified, these users would determine specific PSPS impact locations on its address lookup tool available on the website. While PSPS Zip Code Alerts are not translated, the alerts point customers to the PG&E website that is translated. PG&E is working towards expanding zip code alerts to in-language options by Q3 2020.

4.7.3 Smart Phone SOS Alerts

PG&E is actively engaging with Google to explore new technologies to notify visiting customers that are in the area and could be impacted by PSPS, yet may not be a customer of record who receive direct notifications from PG&E. This technology includes sending push alerts, called SOS Alerts²⁹, to smart phones (both Androids and iOS devices) if the customer has the Google Search App and their location tracking activated on their device. PG&E is actively exploring this technology, which could include translations of useful phrases.

4.7.4 Door-to-Door Contact

As described in PG&E's 2020-2022 Wildfire Mitigation Plan, PG&E provides "door-to-door" contacts, referred to by PG&E as a "door knock," for Medical Baseline customers³⁰ that have not confirmed receipt of their PSPS-event notification.³¹ Medical Baseline customers are provided automated notifications throughout the event via phone, text and email that request a confirmation of received notification. Additional notifications are made in an attempt to verify receipt of notifications. This includes hourly notification retry attempts for those customers that have not confirmed receipt of their notification, as well as "door knocks" if notifications were not previously confirmed as received by the customer (e.g. by answering the phone or pressing any key to confirm receipt). If during the door knock visit it is determined that translation support is needed, PG&E representatives can utilize Language Line Services to assist with translations by either utilizing the "Mobile Insight" app for video interpretation or by reaching an interpreter over the phone for assistance, in order to effectively communicate the message to the customers.

If customers are not home when the door knock visit takes place, a door hanger is left at the customers' premise, which includes the tagline translations to contact PG&E for more information, as well as the reference to contact the language line for all other languages.

²⁸ For more information about PG&E Zip Code Alerts, visit www.pge.com/pspszipcodealerts

²⁹ For more information about Google SOS Alerts, visit crisisresponse.google/products/sos-alerts

³⁰ PG&E customers who are eligible for Medical Baseline tariffs receive an additional allotment of electricity and/or gas per month. The tariffs are designed to assist residential customers who rely on gas or electric service for life sustainability or mobility due to qualifying medical conditions.

³¹ Pa. 5-304 – 5-305

4.8 Community Based Organization Engagement

PG&E will coordinate with Community Based Organizations (CBOs) that have existing relationships and serve disadvantaged and/or hard to reach communities to conduct outreach to customers proactively and/or communicate with customers to provide in-language / translated education and/or PSPS event updates. CBOs have established relationships and will ensure customers have a trusted channel to get the information that they need.

Currently, PG&E engages with over 200 CBOs to provide education and awareness information to its customers. PG&E engages with these organizations in one or more of the following ways:

- Conducting bi-annual trainings with contractors that serve PG&E's customers in the California
 Alternate Rates for Energy (CARE) program, which includes information on relevant PG&E
 programs, including the Community Wildfire Safety Program (CWSP) and Public Safety
 Power Shutoff (PSPS), so they can assist with educating their clientele throughout the year;
- Offering the CBO Direct program that empowers non-profits with resources to assist in the distribution of important safety messaging to their networks of customers in Tier 2 and Tier 3 areas;
- Providing Access for Functional Needs (AFN) organization-focused PSPS webinars;
- Providing in-person PSPS presentations at local events;
- Providing a PG&E exhibitor booth at events supporting AFN populations; and
- Providing CWSP / PSPS literature be shared through CBO communication channels and Energy Services Assistance (ESA) contractor networks.

Furthermore, beyond the active CBO partnerships that PG&E maintains, PG&E also shares communications with a more expansive list of CBOs during PSPS events, including e-mails with links to PG&E's PSPS information toolkit and/or provides one-to-one direct e-mail communications. PG&E is also standing up a new role in the Emergency Operations Center to serve as a CBO coordinator to ensure key CBO partners are provided with situational event updates and access to PG&E personnel for in-event support.

4.8.1 Leveraging CBOs to Communicate with Customers in Indigenous Languages

In light of the additional requirements to communicate with customers that occupy significant roles in California's agricultural economy and speak indigenous languages, such as Mixteco and Zapoteco,³² PG&E intends to serve these customers for its translated outreach and communications through trusted CBO partnerships and multi-cultural media organizations.

For reference, PG&E currently offers a charity-based program, called the "CBO Direct Program." The intent of the CBO-Direct Program is to provide charitable resources to key community-based organizations (CBOs) in Tier 2 and Tier 3 areas to support a comprehensive approach to improving safety in these communities. The focus of the CBO-Direct program is to empower non-profits with resources to assist in the distribution of important safety messaging to their networks

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³² OP 1

of customers in Tier 2 and Tier 3 areas. PG&E intends to leverage a similar approach for its wildfire and PSPS-related outreach and engagement, however, will expand the effort through established Memorandums of Understanding (MOUs) and allocated funding as authorized in OP 21.

PG&E intends to provide CBOs with some flexibility in identifying the indigenous languages and channels for translated communications based on the populations they serve. With consideration to input received from the CBO engagement described in Section 2, CBOs have currently suggested that they serve communities that speak the following indigenous languages: Mixteco, Zapoteco, Triqui, Tlapaneco, Nahuatl, Chatino, Maya, Chinanteca.

PG&E will define clear roles and responsibility as it relates to the outreach and translation needed before, during and after wildfires and PSPS events, and will prioritize collaboration with CBOs that serve customers in Tier 2 and Tier 3 High Fire Threat Districts (HFTDs). Some CBOs may best serve communities only for outreach and preparedness messages, while others may be able to serve customers during PSPS events, including translated communications, such as through the radio, phone trees, and more.

PG&E has recently connected with a few CBOs that have expressed interest in participation and provided ideas of outreach tactics to utilize with indigenous communities prior to the 2020 wildfire season. PG&E recognizes this engagement will be a new approach for implementing indigenous community focused outreach and will launch the CBO-supported effort at a reasonable scale in 2020 (e.g. 2–5 CBO partnerships) to have the opportunity to learn best practices through implementation and adjust as needed.

5 Wildfire and PSPS Communication Deployment Plan Before, During and After an Event

To ensure safety of its communities, PG&E recognizes the importance of effectively informing customers and the public to adequately prepare for and react to a wildfire (and a PSPS event) given their gas and/or electric service may be impacted due to planned or unplanned outages. PG&E will leverage the channels of communication described above to reach its customers, the community and the greater public before, during and after a wildfire, as well as a PSPS event.

Depending on the communication channels utilized (e.g. informative webinars, website, direct notifications, in-person door knocks, proactive news stories and media engagement, social media, customer contact center, print materials, CBO support), PG&E will makes key information available in the languages described above pursuant to the Commission's definition of and sources to determine language prevalence.

Below, Table 5 summarizes all of the outreach channels that will be used, the timing in which they are leveraged (e.g. before, during, and/or after a wildfire and/or PSPS event), the audience that receives the communications, and the progress PG&E has made or plans to achieve for translations (also referenced above in Section 3).

Table 5. PG&E Wildfire related (including PSPS) Communications Tactics, Timing of Implementation, Translation Approach, Audience and Progress

Communication Channel	Timing of Communication Relative to Wildfire/PSPS Event	Languages	Audience	Progress
Wildfire Safety Webinars / Recorded Videos	Before	English, Spanish, Chinese, Korean, Vietnamese, Tagalog, Russian, Japanese, Arabic, Punjabi, Farsi, Khmer, Hmong and American Sign Language (ASL)	Public / All Customers	 Webinars will be conducted between April 29, 2020 and August 5, 2020 with Spanish and Chinese closed captioning available for each webinar. Recorded translated webinars will be available in 12 written languages and ASL by summer 2020.
Customer Notifications	During	English, Spanish, Chinese, Korean, Vietnamese, Tagalog, Russian, Japanese, Arabic, Punjabi, Farsi, Khmer, Hmong	Public / All Potentially Impacted Customers	 First 7 spoken languages for direct to customer notifications available in June with reference to contact call center for all other languages. PSPS Zip Code alert signups currently available and SOS Alerts intend to be available in June. The new 6 languages based on Decision intends to be available in direct to customer notifications prior to Q4, 2020.
Medical Baseline Customer Door Knocks	During	English, Spanish, Chinese, Korean, Vietnamese, Tagalog, Russian, Japanese, Arabic, Punjabi, Farsi, Khmer, Hmong & 250+ languages if using language lines services for in-person encounter	Medical Baseline Customers	Process complete and will be used during events, including translated door hanger, and use of language line services for in-person encounter with translation needs.

Communication Channel	Timing of Communication Relative to Wildfire/PSPS Event	Languages	Audience	Progress
Webpage	Before, During and After	English, Spanish, Chinese, Korean, Vietnamese, Tagalog, Russian, Japanese, Arabic, Punjabi, Farsi, Khmer, Hmong	Public / All Customers	 Language translations have been completed for key PSPS and emergency web pages in first 6 written languages: English, Spanish, Chinese, Tagalog, Vietnamese, Korean and Russian. PG&E intends to have key wildfire related and PSPS web pages translated prior to Q4, 2020 in the six new languages identified in this decision. PG&E will also update the PSPS Address Lookup Map with all 12 languages by Q3, 2020.
Customer Contact Center Support	Before, During, After	Over 250 languages available	Public / All Customers	PG&E's customer contact support already has the capabilities to speak to and provide the necessary information in the required languages.
Social Media	Before, During, After	English, Spanish, Chinese, Korean, Vietnamese, Tagalog, Russian, Japanese, Arabic, Punjabi, Farsi, Khmer, Hmong, ASL	Public / All Customers	Progress is on-going; Translated content will be provided as available, such as translated and ASL videos, and reference to the translated website.
Media Engagement	Before, During, After	Multiple Languages	Public / All Customers	 Press conferences provided during PSPS events including ASL interpreter Engaged throughout the year and during PSPS events and wildfires, including over 150 multi-cultural media outlets. Paid media and advertising highlighting PG&E's inlanguage support for customers available by Q4,
				2020.

Communication Channel	Timing of Communication Relative to Wildfire/PSPS Event	Languages	Audience	Progress
Videos	Before	Multiple Languages	Public / All Customers	Exploring the creation of a 15-30-minute video, and in- language options, which will provide a high-level PSPS overview for the territory before Q4, 2020,
Written Communications (Factsheets, flyers, brochures, signage)	Before	English, Spanish, Chinese, Tagalog, Vietnamese, Korean, Russian, Japanese, Arabic, Punjabi, Farsi Khmer, Hmong	All Customers	 Currently updating critical written communications, such as brochures, mailers, fact sheets and emails, with 2020 updates in all 12 languages prior to Q4, 2020. Tagline-translations will redirect customers to PG&E's call center for translation services in over 200 languages prior to Q4, 2020.
Community Based Organizations	Before, During, After	Multiple Languages, including Indigenous Languages	All customers	PG&E is in process of identifying and engaging CBOs that will assist with providing the necessary communication support within the indigenous community. Initial deployment is planned prior to Q4, 2020.

6 Measuring Outreach Effectiveness

PG&E collects feedback from customers and the community to assess the effectiveness of their outreach and identify barriers and areas for improvement. The feedback is collected both prior to and after wildfire/PSPS events. In PG&E's 2020-2022 Wildfire Mitigation Plan, PG&E describes its approach for outreach assessment.³³

In short, PG&E evaluates outreach effectiveness around wildfire safety and PSPS preparedness through both qualitative and quantitative research. Examples of qualitative research include input from CBOs or small groups of customers. Quantitative research involves representative surveys that measure statistically significant progress over time. These include measures of message awareness and recall, message understanding, and reported changes in behavior. Non-survey quantitative measures include web-traffic, click-through rates of advertisements and conversion

³³ Pg. 5-301 – 5-302

rates / actions taken by customers as a result (e.g. attendance of a webinar, updates made to contact information or adoption of various customer programs, such as Self Generation Incentive Program (SGIP)).

As required by OP 16, PG&E will prepare, file and serve independent survey results by December 31, 2020 that assesses the effectiveness of the community outreach in 2020 described above.

7 Budget

As authorized by OP 21, to the extent that additional budgets for activities planned as an outcome of decision are required, utilities may track costs in their existing Wildfire Mitigation memorandum accounts. In accordance with OP 22, the following budget entails the annualized range of costs associated with this plan, which are not already included in the costs allocated in PG&E's 2020-2022 Wildfire Mitigation plan.

The following are main additions that were not included in the 2020-2022 WMP: CBO contracts to implement indigenous communications, translation services and technology implementation costs associated with adding six additional languages to various channels, additional survey to assess effectiveness of translated communications, customer database technology improvements, paid advertising and associated employee resources.

PG&E is exploring the addition of new resources to manage the CBO engagement needs refered within this workplan. Similarly, to note this budget excludes any input related to the Consumer Protections plan in alignment with R. 18-03-011 and/or budget previously submitted for approval.

Table 6. Budget of Annualized Costs Associated with Activities of Decision 20-03-004

Activity	Budget Range
Additional evaluation survey	\$75,000 - \$150,000
Additional six languages for website & emergency site	\$350,000 - \$600,000
Additional six languages for notifications	\$395,000 - \$495,000
CBO indigenous language communication contracts	\$200,000 - \$1,000,000
Customer database technology adjustments to support language expansion	\$150,000 - \$250,000
Paid Media/Advertising	\$2,100,000 - \$3,200,000
Two to three employee resources	\$400,000 - \$600,000
Total	\$3,670,000 - \$6,295,000

Appendix 1 – Languages Available by PG&E's Language Line Services

The 250+ languages listed below are currently available for translation services to customers when contact PG&E's call center, including at least eight indigenous languages from parts of Latin America: Akateko, K'iché, Mixteco, Napoletano, Quechua, Triqui, Tzotzil, Zapoteco. These languages are bolded in Table 7 below.

Table 7. PG&E Call Center Translation Service Languages Available

Acholi	
Afar	
Afrikaans	
Akan	
Akateko	
Albanian	
Amharic	
Anuak	
Apache	
Arabic	
Armenian	
Assyrian	
Azerbaijani	
Bahasa	
Bahdini	
Bahnar	
Bajuni	
Bambara	
Bantu	
Barese	
Basque	
Bassa	
Belorussian	
Bemba	
Benaadir	
Bengali	
Berber	
Bosnian	
Bravanese	
Bulgarian	
Burmese	
Cantonese	
Catalan	

Cebuano
Chaldean
Chamorro
Chaochow
Chin Falam
Chin Hakha
Chin Mara
Chin Matu
Chin Senthang
Chin Tedim
Chipewyan
Chuukese
Cree
Croatian
Czech
Danish
Dari
Dewoin
Dinka
Duala
Dutch
Dzongkha
Edo
Ekegusii
Estonian
Ewe
Farsi
Fijian
Fijian Hindi
Finnish
Flemish
French
French Canadian

Fukienese
Fulani
Fuzhou
Ga
Gaddang
Gaelic-Irish
Gaelic-Scottish
Garre
Gen
Georgian
German
German Penn. Dutch
Gheg
Gokana
Greek
Gujarati
Gulay
Gurani
Haitian Creole
Hakka-China
Hakka-Taiwan
Hassaniyya
Hausa
Hawaiian
Hebrew
Hiligaynon
Hindi
Hindko
Hmong
Hunanese
Hungarian
Icelandic
Igbo

Ilocano
Indonesian
Inuktitut
Italian
Jakartanese
Jamaican Patois
Japanese
Jarai
Javanese
Jingpho
Jinyu
Juba Arabic
Jula
Kaba
Kamba
Kam Muang
Kanjobal
Kannada
Karen
Kashmiri
Kayah
Kazakh
Kham
Khana
Khmer
K'iché
Kikuyu
Kimiiru
Koho
Korean
Krahn
Krio
Kunama

Kurmanji
Kyrgyz
Laotian
Latvian
Liberian Pidgin English
Lingala
Lithuanian
Luba-Kasai
Luganda
Luo
Maay
Macedonian
Malay
Malayalam
Maltese
Mam
Mandarin
Mandinka
Maninka
Manobo
Marathi
Marka
Marshallese
Masalit
Mbay
Mien
Mirpuri
Mixteco
Mizo
Mnong
Mongolian

Moroccan Arabic
Mortlockese
Napoletano
Navajo
Nepali
Ngambay
Nigerian Pidgin
Norwegian
Nuer
Nupe
Nyanja
Nyoro
Ojibway
Oromo
Pampangan
Papiamento
Pashto
Plautdietsch
Pohnpeian
Polish
Portuguese
Portuguese Brazilian
Portuguese Cape
Verdean
Pugliese
Pulaar
Punjabi
Putian
Quechua
Quichua
Rade

Rakhine
Rohingya
Romanian
Rundi
Russian
Rwanda
Samoan
Sango
Seraiki
Serbian
Shanghainese
Shona
Sichuan Yi
Sicilian
Sinhala
Slovak
Slovene
Soga
Somali
Soninke
Sorani
Spanish
Sudanese Arabic
Sunda
Susu
Swahili
Swedish
Sylhetti
Tagalog
Taiwanese

Tajik

Tamil
Teluga
Thai
Tibetan
Tigré
Tigrigna
Toishanese
Tongan
Tooro
Triqui
Turkish
Turkmen
Tzotzil
Ukranian
Urdu
Uyghur
Uzbek
Vietnamese
Visayan
Welsh
Wodaabe
Wolof
Yemeni Arabic
Yiddish
Yoruba
Yunnanese
Zapoteco
Zarma
Zo
Zyphe

Appendix 2 – Twelve Month Summary of PG&E Translation Services Used by Customers

The following table summarizes the language-specific translation services used by customers when contacting PG&E's contact centers over the course of twelve months (from April 2019 to March 2020). Eighty languages were utilized out of the over 200 languages available in PG&E's call center.

Table 8. PG&E Call Center Translation Services Used Between April 2019 – March 2020

Language	Total Call Volume
SPANISH ³⁴	699,734
CANTONESE	11,979
MANDARIN	8,618
VIETNAMESE	5,090
PUNJABI	1,303
RUSSIAN	1,157
KOREAN	801
PORTUGUESE	751
ARABIC	583
FARSI	494
HMONG	435
JAPANESE	326
TAGALOG	257
CAMBODIAN	227
HINDI	174
DARI	150
LAOTIAN	121
ROMANIAN	112
ARMENIAN	105
THAI	63
PASHTO	57
TOISHANESE	54
FRENCH	53
AMHARIC	48
TIGRINYA	47
MONGOLIAN	41
URDU	38

Language	Total Call
Lunguage	Volume
UKRAINIAN	38
BURMESE	35
Portuguese Br.	33
TURKISH	32
NEPALI	25
ITALIAN	25
MIXTECO	21
GREEK	19
MIEN	18
TELUGU	13
ASSYRIAN	11
BOSNIAN	11
INDONESIAN	11
MAM	11
GUJARATI	10
POLISH	10
CROATIAN	9
HEBREW	8
BENGALI	8
TONGAN	8
BULGARIAN	6
HAITIAN CREOLE	6
TIBETAN	5
GEORGIAN	4
GERMAN	4
SUDANESE ARABIC	4
FUZHOU	3

Language	Total Call
MALAYALAM	Volume 3
MARSHALLESE	3
UZBEK	3
CZECH	2
HUNGARIAN	2
KANJOBAL	2
KAREN	2
MALAY	2
SAMOAN	2
SWEDISH	2
TAIWANESE	2
Yemeni Arabic	2
AKAN	1
ALBANIAN	1
CEBUANO	1
FULANI	1
ILOCANO	1
LINGALA	1
MAAY	1
OROMO	1
Portug. Creole	1
SINHALESE	1
SOMALI	1
TAJIK	1
TAMIL	1
YORUBA	1

³⁴ Includes PG&E call center staff and Language Line Service Vendor translations

Appendix 3 – List of Multi-Cultural Media Organizations

The following table is a list of multi-cultural news organizations with whom PG&E engages before, during and after a wildfire and/or PSPS event.

Table 9. Multi-Cultural News Organizations with Whom PG&E Engages

ABS-CBN International	Hokubei Mainichi	KRON4.2-Skylink TV
Accion Noticiera Telemundo	Hyphen Magazine	KRZZ La Raza 93.3FM
Alianza Metropolitana	India Post	KSCO Telemundo
Alianza News	India West	KSJX AM 1500
APA News & Review	Indian Life & Style	KSMS Univision
Asiance Magazine	In-language Radio	(Monterey/Salinas)
Azteca America San Francisco	Inquirer.net	KSQQ Vietnamese FM
Bakersfield News Observer	KABE Univision	KSRT Radio Lazer Broadcasting
Bilingual Weekly	KBBF Radio	107.1FM Kstati
Cali Today	KBFP 105.3FM La Preciosa	KSTS Telemundo
California Advocate	KBIF 900 AM/KIRV 1510 AM	
California Black Media	KBTV-Crossing TV	KSTV 32 Azteca America
China Daily	KBYN Radio	KTNC Tu Vision
China News Service	KCNS 38	KTRB ESPN Deportes 860AM SF
China Radio International	KCNS 38, Que Hong Media TV	KTSF 26
Chinese Radio Inc.	KDEE 97.7.FM	KUVS Univision
d'primera mano	KDTV Univision	KVVN Binh Minh Radio
El Bohemio	KEST-Sino Radio	KVVN Saigon Radio
El Latino	KFSO 92.9 FM La Preciosa	KVVN Vietnamese Radio San Jose
El Observador	KFTV Univision	KXTS Exitos 98.7 FM
El Popular	KGBR Radio	La Opinion
El Sol	KGTE Telemundo 17.3	La Opinion de la Bahia
El Sol Azteca	KIDI La Buena 105.1 FM & KTAP	La Opinion Los Angeles
	1600 AM	La Voz
El Sol Oaxaqueno	KION Telemundo	Latino Times
ETTV	KJOR La Mejor 104.1FM	New Tang Dynasty TV
FilAm Star	KLBN Lotus Fresno	News for Chinese
Fronteras	KLIB Radio TNT	News for Chinese Radio
Fuji News Network	KMJE/KVMX Radio	Nha Magazine
Fusion Latina	KMSG Azteca TV	NHK Japan Broadcast
Goldenlink Radio	KMTP 32	Nichi Bei Weekly
Hispano Times	Korean Broadcast System	Nikkei West
Hmong Community Radio	·	Philippine News Today
Hmong TV Network	Korean-American Radio AM 1420	Phoenix TV
Hmong TV USA	KPMR Univision	

Phu Nu Cali Magazine
Pinoi TV
Que Huong Media Radio AM
1200
Radio Bilingue
Radio Jose 97.1 FM
Radio Jose KSES 107.1 FM
Radio Jose KXSE 104.3 FM
Radio KIQI 1010 y 990 AM
Radio Latino KLMG 97.9
Radio Merced (Radio Lobo KLOQ
98.7 FM & Magia 106.3 FM)
Russian America Media
Sacramento Observer
San Francisco Bay View
San Francisco World TV
Santa Maria Times en Espanol
(online)
Sing Tao Chinese Radio
Sing Tao Daily

South Korean Public TV
Sun Reporter
Te lo Cuento News
Telemundo - Dallas
Thang Mo Weekly Magazine
The Asian Journal
The China Press
The Epoch Times
The HUB Magazine
The Korea Daily
The Korea Times
The Post
The San Bernardino American News
The Viet Tribune
The Viet Tribune
Thoi Bao Daily News
Tokyo Broadcasting System
Tri County Sentry

-	TVB
ı	Univision Nevada
Į	Univision Radio Fresno
١	V Times
١	Vida en el Valle - Fresno
١	Vida en el Valle - Modesto
١	Vida en el Valle - Sacramento
١	Viet News Weekly
١	Viet Weekly
١	Vietnam Daily News
١	Vietnam Radio AM 1430
١	Vision Hispana
١	Vision Magazine
١	Voz 1010 am
١	Westside Story News
١	Wolfhouse Radio Group
١	World Journal
)	Xinhua News Agency

Appendix 4 – Fully Translated Collateral Examples: CWSP, PSPS & Medical Baseline Fact Sheet

The following fact sheets shown in Figures 4 – 6 are examples of critical documents that PG&E will translate in the 12 languages determined as prevalent in PG&E's territory as described in Section 2.

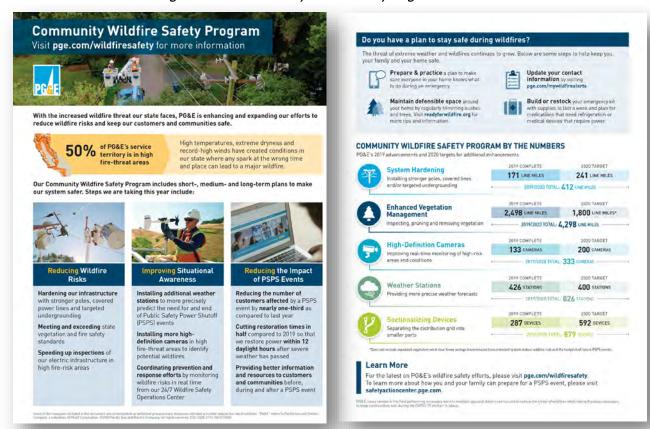


Figure 4. PG&E Community Wildfire Safety Program Overview

Figure 5. PG&E PSPS Program Overview





Medical Baseline Program

Savings and safety for people with special energy needs

Program Overview

PG&E's Medical Baseline Program is an assistance program for residential customers who have special energy needs due to qualifying medical conditions. Eligibility is based on medical conditions or needs of a person in your home, NOT on income. The program includes two different kinds of help:

- A lower rate on your monthly energy bill (additional energy at the lowest rate)
- Extra notifications in advance of a Public Safety Power Shutoff (PSPS)

Examples of Qualifying Medical Conditions and Devices:

- Multiple Sclerosis
- Asthma/Sleep Apnea
- Special Heating/ Cooling Needs
- Respirators
- Motorized Wheelchairs
- IPPR/CPAP Machines
- Hemodialysis Machines

For a complete list of qualifying medical conditions and devices, visit pge.com/medicalbaseline or call 1-800-743-5000.

Extra Notifications During a PSPS Event

If severe weather threatens a portion of the electric system serving a community, it may be necessary for PG&E to turn off electricity in the interest of public safety. This is known as a PSPS.

When possible, PG&E provides extra alerts for households participating in the Medical Baseline Program leading up to and during such an event to help them prepare.

If we are unable to reach you via phone, text or email. PG&E will also attempt to knock on the doors of those customers who rely on electricity for critical life sustaining equipment when possible.



> See reverse for application instructions.



APPLYING FOR PG&E'S MEDICAL BASELINE PROGRAM IT'S AS EASY AS 1,2,3!

CHECK YOUR ELIGIBILITY. Review the complete list of qualifying conditions/ machines available at pge.com/ medicalbaseline and work with a qualified medical practitioner to certify that a full-time resident in your home requires use of qualifying medical devices for has specific heating/ cooling needs) to treat ongoing medical conditions. Note, eligibility for Medical Baseline is based on medical conditions or needs, NOT on income.

VISIT pge.com/medicalbaseline to download and print the Medical Baseline Program application form or call 1-800-743-5000 and ask to have one mailed to you.

COMPLETE AND SIGN Part A of the Medical Baseline Program application form, including your preferred contact method, and make sure Part B is completed and signed by a qualified medical practitioner. Then, mail it in to:

> PG&E Credit and Records Center Medical Baseline P.O. Box 8329 Stockton, CA 95208

Do You Have a Plan to Stay Safe **During Power Outages?**



UPDATE YOUR CONTACT INFORMATION by visiting pge.com/mywildfirealerts or calling 1-800-743-5000.



PREPARE AND PRACTICE A PLAN to keep you and your family safe during an emergency. Visit pge.com/wildfiresafety for more steps you can take to prepare





DURING A PUBLIC SAFETY POWER SHUTOFF please answer calls and/ or reply to text messages from 1-800-743-5002. (Tip: Save this number in your phonel



WILL YOU NEED EXTRA HELP DURING A POWER SHUTOFF?

If you or someone you know has a disability or additional special needs, the California Foundation for Independent Living Centers can help you during a PSPS. For ormation please visit disabilitydisasteraccess.org.

NOTE FOR MEDICAL PROFESSIONALS

A licensed physician, nurse practitioner, physician assistant or person licensed pursuant to the Osteopathic Initiative Act, may certify a patient's eligibility as having a life-threatening condition or illness for the Medical Baseline Program. This program is not connected to any other medical assistance program like Medicare or Medi-Cal and only provides a lower energy rate from PG&E and extra notifications during a PSPS. A full list of qualifying conditions and machines is available at pge.com/medicatbaseline.

PG&E Gas and Electric Advice Submittal List General Order 96-B, Section IV

AT&T

Albion Power Company Alcantar & Kahl LLP

Alta Power Group, LLC Anderson & Poole

Atlas ReFuel BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission
California Public Utilities Commission
California State Association of Counties
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services Don Pickett & Associates, Inc. Douglass & Liddell Downey & Brand
East Bay Community Energy
Ellison Schneider & Harris LLP
Energy Management Service

GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute

Engineers and Scientists of California

Hanna & Morton ICF

IGS Energy

International Power Technology Intestate Gas Services, Inc.

Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.

Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McKenzie & Associates

Modesto Irrigation District NLine Energy, Inc. NRG Solar

Office of Ratepayer Advocates OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy Pioneer Community Energy

Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc. SCD Energy Solutions

SCE SDG&E and SoCalGas

SPURR
San Francisco Water Power and Sewer
Seattle City Light
Sempra Utilities
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Troutman Sanders LLP
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy