

Customer Service Policy A.6 Emergency Consumer Protection Policy

Purpose:

Pursuant to the California Public Utilities Commission (CPUC) directives and advice letters, residential and non-residential customers in areas where a state of emergency proclamation is issued by the California Governor's Office or the President of the United States due to a disaster that affects utility service are eligible for consumer protection measure(s) under PG&E's Emergency Consumer Protection Plan¹. Sonoma Clean Power Authority (SCPA) provides additional emergency consumer protections to its customers as described below.

Background:

Background on SCPA's history of response to natural disasters is located in Attachment A of this Policy.

Applicability:

This Policy applies to SCPA Residential Customers and Non-Residential Customers when a state of emergency proclamation is issued by the California Governor's Office or the President of the United States due to a disaster in SCPA's Service Territory that:

- a. Results in the loss or disruption of the delivery or receipt of electric utility service; and/or
- b. Results in the degradation of the quality of electric utility service.

Eligibility for Emergency Consumer Protection Plan:

A customer will be eligible for SCPA's Emergency Consumer Protection Policy if the following criteria have been met:

- a. A state of emergency proclamation has been issued by the California Governor's Office or the President of the United States due to a disaster in SCPA's Service Territory;
- b. The customer is a Residential Customer or Non-Residential Customer of SCPA; and
- c. The customer's premise was or is Red Tagged and/or coded by PG&E as DSNT/DSST/DSBR/DSOV, as defined at the end of this Policy.

Emergency Consumer Protection Plan:

SCPA's Emergency Consumer Protection Plan goes into effect the day a state of emergency proclamation has been issued by the California Governor's Office or the President of the United States due to a disaster in SCPA's Service Territory and includes the measures and parameters outlined below:

- a. **Late Payment Notice:** SCPA will stop sending Late Payment Notices to eligible customers for a period of 12 months.

¹ PG&E Advice Letter 4014-G/5378-E. Dated Sept. 7, 2018. www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5378-E.pdf.

- b. **Pre-Collection Notice for Non-Payment:** SCPA will stop sending Pre-Collection Notices for non-payment of SCPA charges to eligible customers for a period of 12 months.
- c. **Transfer for Non-Payment:** SCPA will not transfer eligible customers to PG&E service for non-payment of SCPA charges for period of 12 months.
- d. **Collections:** SCPA will halt collection activity for eligible customers for a period of 12 months.

SCPA's Board of Directors may change or extend these measures at its sole discretion.

Definitions:

For purposes of this Policy, the following definitions apply. Customers may also wish to review PG&E's Emergency Consumer Protection Plan² for additional information.

- a. **Residential Customer**³: Class of customers whose dwellings are single-family units, multi-family units, mobile homes or other similar living establishments. A customer who meets the definition of a Residential Customer will be served under a residential rate schedule if 50% or more of the annual energy use on the meter is for residential end-uses. PG&E's tariff eligibility requirements will determine customer eligibility for this rate class.
- b. **Non-Residential Customer**⁴: Small and medium business customers that take service on a commercial, industrial, or agricultural rate. This definition does not include Non-Residential Customers who are on a fixed usage or unmetered usage rate schedule⁵.
- c. **SCPA Service Area:** As defined by SCPA's Joint Powers Agreement⁶.
- d. **Impacted Customers:** Customers that live within 2 miles of the disaster-impacted perimeter as designated by CAL FIRE or another governmental agency. General areas, including by zip code may be used until a disaster-impacted perimeter is established at SCPA's sole discretion⁷ and/ or coded DSIR by PG&E.
- e. **Inspection Tags**⁸: The three colored tags (green, red and yellow) match placards posted on inspected structures⁹. Each type of placard is used by inspectors under the following circumstances:
 - i. **Green (Inspected)** - Buildings can be damaged, yet remain safe - the safety of the building was not significantly changed by the disaster.
 - ii. **Red (Unsafe)** - Buildings are damaged and pose an imminent threat to life or safety under expected loads or other unsafe conditions.
 - iii. **Yellow (Restricted Use)** - There is some risk from damage in all or part of the building that does not warrant red-tagging. The extent of damage

² PG&E Advice Letter 4014-G/5378-E. Dated Sept. 7, 2018. www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5378-E.pdf.

³ PG&E Electric Rule No. 1: Definitions, Sheet 30

⁴ PG&E Advice Letter 4014-G/5378-E. Dated Sept. 7, 2018.

⁵ PG&E Electric Rule No. 1: Definitions, Sheet 31

⁶ Sonoma Clean Power Authority Joint Powers Authority. <https://sonomacleanpower.org/uploads/documents/Third-Amended-JPA-FinalApproved-10-13-16-with-updated-Ex-C.pdf>

⁷ PG&E Advice Letter 4014-G/5378-E. Dated Sept. 7, 2018. www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5378-E.pdf.

⁸ County of Sonoma. "Permit Sonoma" <http://sonomacounty.ca.gov/PRMD/Eng-and-Constr/Building/RESA-2019-Flooding/>

⁹ Important Note: Although a building may be placarded "Inspected" or "Restricted Use", specific areas in and around the building could be further identified as unsafe.

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may be uncertain or cannot be ascertained within the time and resources available.

- iv. **Orange (No Access)** - Parcels may be labeled as orange, which is not a tag color, but is used only to indicate that an inspection was performed on the property however the inspector was not able to access the structure(s). This could be due to a number of issues including downed power lines, locked gates, and debris blocking the roadway, damaged bridges, or other similar items.
- f. **PG&E REF|TD Codes** - PG&E will use the EDI billing codes outlined below to identify impacted SCPA customers per CalFire and/or County assessment(s). The codes allow for near real-time status of impacted customers.
 - i. **Disaster Event Review (DSIR)** - location with close proximity of disaster, but not confirmed if property is damaged/destroyed/Red Tagged.
 - ii. **Disaster Event Cleared (DSCL)** - After review, the location is not deemed damaged/destroyed/Red Tagged.
 - iii. **Disaster Red Tag Notice (DSNT)** - pending bill relief decision. Stops SA and final/closing bill but will not complete bill - temporary status.
 - iv. **Disaster Red Tag Standard (DSST)** - bill relief not applied. Stops SA, final/closing bill, and completes bill (final status).
 - v. **Disaster Red Tag Bill Relief (DSBR)** - bill relief applied. Stops SA, final/closing bill, completes bill and applies debt reversal adjustment for SA balance (final status).
 - vi. **Disaster Red Tag Override (DSOV)** - manual override. Process manually if needed (final status).

Attachment A

Background:

October 2017 Northern California Wildfire:

After the 2017 Northern California Wildfires, pursuant to CPUC Resolution M-4833, E-4899 and Advice Letter 3914-G-A/5186-E-A, PG&E adopted their Emergency Consumer Protection Plan to support customers who were affected by the October 2017 Northern California Wildfires. Residential and Non-Residential customers in Butte, Lake, Mendocino, Napa, Nevada, Plumas, Santa Cruz, Solano, Sonoma, and Yuba counties affected by the 2017 Northern California Wildfires were eligible for the Emergency Consumer Protection Plan until December 31, 2018. Measures related to expedited service, rate selection and temporary service for red-tagged customers are available to affected customers until December 31, 2018 and until PG&E service is restored (once permanent electric or gas meter is installed/set).

SCPA adopted its own internal policy, "October 2017 California Wildfires Customer Protections Internal Policy I.8", which established a series of billing and service modifications and credit relief to support customers recovering from the immediate aftermath of the October 2017 Northern California Wildfires. The customer protections were aimed to help SCPA customers who experienced housing or financial crises due to the 2017 wildfires.

Mendocino Complex Fire 2018:

SCPA began the process of writing its own internal policy, "Emergency Consumer Protection Plan and Emergency and Disaster Response Internal Procedures & Policy I.12". Although the Policy and Procedures were not approved until after the Mendocino Complex Fire, the protections were put in place for SCPA Residential Customers and Non-Residential Customers. SCPA modeled its policy after the protections granted during the Northern California Wildfires.

West County Floods 2019:

SCPA finished its "Emergency Consumer Protection Plan and Emergency and Disaster Response Internal Procedures & Policy I.12" and implemented it during this natural disaster. This Policy was written based on the internal policy.

Investor Owned Utilities:

On July 11, 2019, the CPUC issued D.19-07-015, which adopted an emergency disaster relief program for Investor Owned Utility customers. The emergency disaster relief program is designed to ensure that California utility customers who experience a housing or financial crisis due to a disaster, keep vital utility services and receive financial support in the wake of a disaster.

Adopted: October 1, 2020

Kincade Fire 2019:

SCPA implemented its "Emergency Consumer Protection Plan and Emergency and Disaster Response Internal Procedures & Policy I.12".

LNU Lightning Complex Fires 2020:

Ratified by SCPA's Board of Directors: 10/01/2020

In the early morning hours of Sunday, August 16, and again on Monday, August 17, a series of uncommon thunderstorms rolled through most of northern California as an offshoot of the diminishing Tropical Storm Fausto. With these thunderstorms came a reported 10,849 lightning strikes that - within a 72 hour period - had then presumably sparked 376 known fires across much of California.

On August 18, Governor Gavin Newsom declared a statewide emergency to help ensure the availability of vital resources to combat fires burning across the state, which have been exacerbated by the effects of the historic West Coast heat wave and sustained high winds.

SCPA implemented its "Emergency Consumer Protection Plan and Emergency and Disaster Response Internal Procedures & Policy I.12".

August Lightning Complex Fires 2020:

Ratified by the SCPA's Board of Directors: 10/01/2020

The August Complex is a massive wildfire burning in the Coast Range of Northern California, in Glenn, Lake, Mendocino, Tehama, and Trinity Counties. The complex originated as 38 separate fires started by lightning strikes on August 16-17, 2020. Four of the largest fires, the Doe, Tatham, Glade, and Hull fires, had burned together by August 30. On September 9, the Doe Fire, the main fire of the August Complex, surpassed the 2018 Mendocino Complex to become both the single-largest wildfire and the largest fire complex in recorded California history.

As of September 21, the August Complex fire has burned a total of 846,732 acres, or 1,323 square miles. Due to the immense size of the affected area, the fire is being managed as three separate incidents within a larger complex. The Doe Fire is defined as the August Complex South Zone and the Elkhorn Fire is defined as the August Complex North Zone. The August Complex West Zone was split off from the western portion of the Elkhorn Fire.

The fires have largely burned in the Mendocino National Forest, with portions spilling over to the Shasta-Trinity National Forest and Six Rivers National Forest in the north, as well as private land surrounding the forests. Large areas of the Yolla Bolly-Middle Eel Wilderness and Yuki Wilderness have been burned. Rugged terrain combined with consistent high winds and record heat have complicated firefighting efforts.

Adopted: October 1, 2020

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