

Customer Service Policy A.6c 2020 August Complex Fires 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.

Emergency Incident:

August Lightning Complex Fires 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.

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".

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

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 until September 30, 2021.
- b. **Pre-Collection Notice for Non-Payment:** SCPA will stop sending Pre-Collection Notices for non-payment of SCPA charges to eligible customers until September 30, 2021.
- c. **Transfer for Non-Payment:** SCPA will not transfer eligible customers to PG&E service for non-payment of SCPA charges until September 30, 2021.
- d. **Collections:** SCPA will halt collection activity for eligible customers until September 30, 2021.

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.

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

- a. **Residential Customer³**: 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 Customer⁴**: 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 Tags⁸**: 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 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.

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.

- 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).