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March 27, 2020

Leslie Palmer
Director, Safety and Enforcement
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Mr. Palmer:

PG&E takes seriously the threat of the novel coronavirus (COVID-19) pandemic and is taking measures to protect the health and safety of our customers and our workforce while continuing to provide safe and reliable service. PG&E is monitoring guidance from the Centers for Disease Control (CDC) as conditions change related to COVID-19 and we are continuing to update our protocols and actions in accordance with this guidance and as the situation evolves.

This letter provides information requested in Executive Director Stebbins' letter dated March 20, 2020 on the actions PG&E is taking to protect the health and safety of our customers and workforce and to ensure continuity of service during these challenging times.

Incident Management Team and Emergency Operation Center

PG&E set up an Incident Management Team (IMT) to monitor and respond to the virus on February 27 and formally activated our Emergency Operations Center on March 16 to facilitate and coordinate the company's response to the spread of the virus in accordance with the Company's Emergency Response Plan. Early actions of the IMT included providing information to employees and taking actions including those outlined in the attached employee messages¹ and hiring an infectious disease and pandemic expert to support education and preparedness action development. Early on, the IMT recognized that PG&E's existing Pandemic Plan, developed to address H1N1, needed to be updated, but then pivoted to develop a new Infectious Disease and Pandemic Response Plan (attached).² This Plan is based on

¹ A Message from Dinyar Mistry dated February 28, 2020; A Message from Dinyar Mistry dated March 4, 2020

² The Pandemic Plan differs from PG&E's plans for wildfires and earthquakes in that the threat is not tangible and impact of exposure is delayed. This results in an escalating threat that, once visible, will continue to escalate in complexity for days to weeks after response mitigations are executed. As a result, the Infectious Disease/Pandemic Plan incorporates prevention and mitigation strategies with a focus on limiting exposure and impact and includes contingency planning and alignment with government agencies responsible for response.

guidance from the CDC, WHO, OSHA and Cal-OSHA and will be updated as the situation evolves. At a future time, PG&E will build a Plan Annex based on the action plans being developed during this response.

Safety and Continuity of Service

On March 12, several days before the Bay Area counties' shelter-at-home orders, PG&E asked its office-based workforce to work from home. We took additional measures to promote social distancing, including cancelling all PG&E-hosted conferences, suspending all business travel and transitioning all in-person meetings to calls, including the normal daily huddles, team meetings and updates.³ Before the Governor's statewide shelter-at-home order came out, PG&E asked all employees who are over 65 years old and those with chronic health conditions to stay home and isolate themselves against possible COVID-19 infection.⁴

In response to the counties' shelter-in-home orders, PG&E directed employees to follow the guidelines in these counties and not report to work locations unless their roles directly support the delivery, maintenance and restoration of gas and electric service, as discussed below.⁵ PG&E broadened this guidance to all employees following the statewide shelter-at-home order.⁶ Employees who can work remotely have been directed to continue their work, with guidance on working from home safely and ergonomically.⁷ We are also providing IT support, including laptops and other equipment and other IT resources where possible.⁸ For employees who cannot work from home, we have implemented interim time recording policies that will continue to be evaluated. We have also established a HR helpline to respond to employees' questions.

The employees who must continue to work on-site include those who operate gas and electric dispatch operations, powerplant operators and maintenance staff, and others whose work cannot be performed remotely. Practices at these work stations include social distancing, extensive and regular site cleaning, and other precautions recommended by medical experts.

We have taken several actions to address workplace hygiene, including: ordering additional hand sanitizer stations to install in high population facilities; increasing wipe-downs of highly used door handles and meeting areas (e.g., breakrooms and conference rooms if any are still in use); and ensuring custodial staff are using proper disinfectants. PG&E is working to finalize procedures relating to critical facilities, and will provide that to you when it is finalized.

PG&E has provided guidance to field employees on Personal Protective Equipment (PPE) use; we are updating that guidance based on information from the CDC and feedback from the unions and employees.⁹ We are requiring our contractors, suppliers and sub-contractors who visit or serve a PG&E site or work on our behalf to follow the guidelines set by the CDC, the Governor, and city and county health officials.

³ A Message from Dinyar Mistry dated March 12, 2020; A Message from Dinyar Mistry dated March 13, 2020

⁴ A Message from Dinyar Mistry dated March 15, 2020

⁵ A Message from Dinyar Mistry dated March 16, 2020

⁶ A Message from Andy Vesey dated March 20, 2020

⁷ A Message from Francisco Benavides dated March 20, 2020

⁸ A Message from Kathy Kay dated March 18, 2020

⁹ 5 Minute Meeting and Frequently Asked Questions dated March 26, 2020

Essential Work

As you know, the Governor’s shelter-at-home order exempts essential workers in critical infrastructure sectors, including energy. This includes individuals performing any work necessary to the operation and maintenance of gas and electrical systems and services, including those who support other essential services.

PG&E has developed guidance to identify the essential work that must continue for the benefit of our customers and communities. Emergency response, critical maintenance, work associated with our Wildfire Mitigation Plan and our preparedness for Public Safety Power Shutoff (PSPS), and new customer connections are examples of work that will continue. As PG&E continues with critical and essential safety and maintenance projects, we will minimize customer impacts to the extent possible.

We are delaying some work in order to maintain the reserve workforce and effectiveness that will be necessary to maintain reliable service as the COVID pandemic continues. This includes work that can either be delayed for a short period or does not have an immediate impact on system safety or reliability. It may be necessary to postpone new business customer work scheduled for construction in the next few weeks. We will also try to delay those jobs that require taking planned outages, to avoid increasing customers’ discomfort under shelter-in-place requirements. These efforts may cause delays in meeting some work plan targets and compliance obligations.

The COVID-19 situation is evolving and we will continue to adjust our work as necessary to deliver safe, reliable energy and to keep our customers, communities, and employees safe. Our current definitions and plan for essential and critical work is included below.

PG&E Guiding Principles for Essential and Critical Field Work During the COVID-19 Impacts			
Guiding principles for essential work, that cannot be performed remotely:			
<ol style="list-style-type: none"> Protects the safety of the general public. This work includes emergency response, service restoration and service calls. Provides continuity of service. This work includes operations, maintenance and construction work to ensure the system continues to operate safely, service connections/system extensions to new customers, and critical infrastructure work. This also includes taking customer calls. Protects the safety of our assets. This includes work to inspect the system to identify defects and work that will prevent degradation of the system. Ensures regulatory compliance requirements that cannot be delayed are met. This includes work with compliance dates within the next three months or that is required for full year compliance requirements to be met, except where the regulatory authority allows an exemption. Enables the execution of essential work. This includes materials operations, fleet and aviation services, environmental services, field safety support services, and telecommunication operations. Considers the safety of our employees. Performing essential work will be subject to appropriate measures to protect the safety of our employees and contractors. 			
Essential Work for Electric	Essential Work for Gas	Essential Work for Generation	Essential Work for Customer
<ul style="list-style-type: none"> Emergency repairs and work to make 	<ul style="list-style-type: none"> Emergency response, service restoration and 	<ul style="list-style-type: none"> Critical Generation Work includes the continuing safe and 	<ul style="list-style-type: none"> Contact Center Operations are considered

<p>situations safe, such as in response to house fires, car/pole accidents and storms.</p> <ul style="list-style-type: none"> • Electric transmission projects such as installing new equipment to reduce wire, equipment and connector failures before wildfire season; pre-approved grid work for public safety and compliance requirements; work to make Public Safety Power Shutoff events smarter, smaller and shorter such as sectionalizing by adding switches and islanding work at the Humboldt Bay Generation Station. • Electric distribution projects to complete include wildfire mitigation program work, critical maintenance, and critical new business work. Examples of essential work are: wildfire hardening, PSPS sectionalizing, surge arrester 	<p>pilot-light relight work will continue in support of our commitment to deliver safe and reliable gas.</p> <ul style="list-style-type: none"> • Regulatory compliance work due in 2020 such as inspections to identify defects (leak surveys, cathodic protection reads, patrols); maintenance work on the system to ensure it continues to function safely (valve maintenance, regulator maintenance); and work that prevents system degradation (such as Locate and Mark work in advance of construction and digging projects). • New customer connections with the installation of mains and service pipelines that are consistent with city and county determination that this is critical infrastructure work. 	<p>reliable operation and maintenance of Generation assets and infrastructure.</p> <ul style="list-style-type: none"> • Ongoing work for Power Generation is measured against the following mission-critical goals: Ensure dam safety, employee safety, public safety and all associated compliance requirements; Maintain environmental stewardship; Meet water delivery commitments, especially if needed to support public health and welfare; Contribute to grid stability (reliability); Support hydro license compliance. • Ongoing work for Nuclear Generation is being reviewed week-by-week to remove all non-essential on-site work from the schedule. • On-site essential work includes activities that are required by technical specifications; regulatory required activities; surveillances, tests and maintenance. Nuclear Generation teammates who are able to work offsite are continuing to move their projects ahead as scheduled, but remotely. 	<p>essential, handling emergency, outage and other important customer and field related calls.</p> <ul style="list-style-type: none"> • Customer Service Office staff are deemed essential, since they will be trained to handle customer calls, providing support to our contact center workforce. • Credit Operations and Customer Revenue Processing support changes to customer policies, like the current moratorium on shut-offs, and process incoming payments in West Sacramento. • Billing Operations (Stockton SRO & West Sacramento Bill Printing & Presentment) are essential, ensuring the timely and accurate billing for customer accounts.
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<p>replacement; compelling overhead and underground facility maintenance and pole replacement in support of safety or reliability; new business work to support projects with residents ready to move in; new business projects related to medical, agencies, labs, manufacturers or businesses supporting COVID-19 response; new business projects in support of homeless shelters, elder-care facilities, grocery stores and restaurants providing take-out service.</p> <ul style="list-style-type: none"> • Rebuilding work in Butte County related to the Camp Fire. • System inspections, including climbing transmission towers and aerial inspections in high fire-threat districts. • Routine and enhanced vegetation management, which keeps trees and branches 			
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<p>away from power lines.</p> <ul style="list-style-type: none"> IT telecom projects deemed critical and touch SCADA, RTU and Network devices, as well as critical components for wildfire (i.e., weather stations and reclosers). 			
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The following work types that cannot be performed remotely should be considered for delay during this three-month period:

- Regulatory Compliance Work;** Work due beyond 2020. Work that can currently be delayed for a short period within compliance requirements.
- Internal Compliance Work** (PG&E Standards); work that improves but does not have an immediate impact on system safety or reliability.
- Asset Reliability Work** (including rate case units of work commitments); work that does not have an immediate impact on the ability to deliver service. Examples: Long term asset replacement program work; maintenance of assets where there is an adequate level of redundancy or capacity.
- In Flight Work** which is not compliance work should be considered for delay; an assessment should be made of the amount of work remaining to complete and the amount of work necessary to make the job site safe.

Non-Essential Work for Electric	Non-Essential Work for Gas	Non-Essential Work for Generation	Non-Essential Work for Customer
<p>Examples of electric work that PG&E will defer include:</p> <ul style="list-style-type: none"> lower-priority regulatory compliance work. grid capacity projects. lower-priority electric reliability projects such as animal abatement and removing idle facilities. new business work with occupancy slated for three months 	<p>Examples of gas work that PG&E will defer include:</p> <ul style="list-style-type: none"> regulatory compliance work due in 2021 and beyond. work that improves gas system safety or reliability but does not have an immediate impact on gas system safety. asset reliability work that does not have an immediate 	<p>Examples of deferred work for Nuclear Generation include</p> <ul style="list-style-type: none"> tunnel cleaning; non-critical preventative maintenance and equipment preventive maintenance; etc. Various inspections, assessments and on-site activities. Examples of deferrals for Power Generation include delaying a planned outage at Humboldt Bat Generating Station, and the restructuring/scoping of the outages at 	<ul style="list-style-type: none"> CRC audits in shelter in place communities. Community Wildfire Safety Program community events. Outreach events in CSO. All in-person work related to energy efficiency and the energy savings assistance program.

<p>or more in the future.</p>	<p>impact on gas delivery.</p> <ul style="list-style-type: none"> • and in-flight work that is not compliance-driven and can be successfully halted. 	<p>Colusa and Gateway. Various inspections, assessments and non-critical planned outage activities.</p>	
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Employee Communications

PG&E has communicated about safety and essential work to employees company-wide and through their departments. Examples of communications sent by Electric Operations, Gas Operations and Power Generation are attached.

Contact Center Operations

PG&E’s goal for its Contact Center Operations (CCO) is to provide timely and responsive support to PG&E’s customers for emergencies, payment inquiries, technical questions, and energy related services and programs. In 2019, PG&E’s CCO handled 14.8M calls with automated systems and 6.3M calls with over 750 live agents with centers in Fresno, San Jose, and Sacramento.

In response to the COVID-19 crisis, PG&E is implementing a ‘home agent’ solution, providing IT support so our employees can handle customer calls while sheltering and working at home. We now have over 340 agents working from home, with a goal of another 50 by the end of this week, and a total of 500 by the end of next week. PG&E has closed all local offices for customer and employee safety, and plans to train and provide IT support to over 75 local-office employees to handle customer calls from home. If PG&E experiences high absenteeism due to the COVID-19 crisis, CCO will limit live-agent calls to emergency, outage, and stop-service calls and handle other calls using the existing automated system.

Credit and Collections -- Emergency Consumer Protection Plan

Effective March 12, PG&E suspended disconnections for non-payment for residential and small-business customers. On March 19, PG&E filed AL 4227G/5784E in compliance with D1907015, to present our Emergency Consumer Protection Plan for customers affected by COVID-19. This plan extends PG&E’s moratorium on disconnections and waives deposit and reconnection fees on customers affected by COVID-19 until March 4, 2021, implements flexible pay-plan options for affected customers, and provides additional support to affected low-income and medical-baseline customers. Pay plans for customers affected by COVID-19 will be relaxed to 12 months, and affected customers will be exempt from standard and high-usage post-enrollment verification for CARE eligibility. In addition, PG&E will suspend all customer removals from the medical baseline program, and waive all medical baseline recertification requirements through March 4, 2021. PG&E will communicate these changes to customers through partner community-based organizations and non-profits, targeted messaging, our customer contact centers, social media communications, and a dedicated website.

Customer Communications

PG&E recognizes the important role we have in informing and educating our customers about the steps that the company is taking to ensure consistent and reliable service during the ongoing COVID-19 crisis. PG&E has established a centralized landing page, pge.com/covid19, to promote public awareness of the precautions we are taking to protect our customers and reduce the spread of COVID-19. This material is available in six different languages to ensure our non-English speakers have access to this information. Similarly, we used multi-language signage to notify customers of the closure of PG&E's office closures due to COVID-19. PG&E continues to communicate directly with our customers through traditional and social media, paid advertising, web outreach and more.

Customer communication through Wednesday, March 25 included:

- Thu., Mar. 12 --NEWS RELEASE: PG&E's Pandemic Response Includes Precautionary Health and Safety Actions; Moratorium on Customer Shutoffs for Nonpayment
- Fri. Mar. 13 --CUSTOMER EMAIL: Message from Bill Johnson regarding pandemic response.
- Mon. Mar 16 -- NEWS RELEASE: PG&E is Committed to Providing Safe, Reliable Energy and Ensuring Business Continuity in These Challenging Times
- Wed. Mar. 18 --NEWS RELEASE: For Customers Who May Be Impacted by the COVID-19 Pandemic, PG&E Offers Ways to Reduce Energy Use and Bills
- Wed. Mar. 18 -- CUSTOMER EMAIL: 12 Ways To Save Energy When You are Home
- Thurs., Mar 19 -- NEWS RELEASE: PG&E to Customers: Beware of Scammers Taking Advantage of COVID-19 Fears
- Fri., Mar. 20--NEWS RELEASE: PG&E Donates Nearly One Million N95 and Surgical Masks to Support Hospitals, Health Care Workers and Emergency Responders; PG&E to Contribute \$1 Million to Nonprofits Supporting COVID-19 Response
- Fri, Mar. 20 -- PG&E CURRENTS: N95 and Surgical Mask Donations
- Sat. Mar 21 -- CUSTOMER EMAIL – PG&E's commitment to serve and support our customers
- Mon., Mar. 23 -- CUSTOMER EMAIL: Energy Efficiency Customer Email
- Wed. Mar. 25 -- NEWS RELEASE: Financial assistance/Consumer protection programs available

PG&E continues to maintain its existing Safety Action Center (safetyactioncenter.pge.com) and has established a dedicated education resource regarding the COVID-19 pandemic. (<https://www.safetyactioncenter.pge.com/articles/45-learn-facts-coronavirus>)

We are distributing similar material across PG&E's various social media channels (including Facebook, Twitter, LinkedIn and NextDoor) to reach our customers through multiple avenues. As the COVID-19 situation evolves, PG&E will continue to use earned and paid media, website content, social media and digital mail to engage with our customers how PG&E is working to ensure safe and reliable delivery of energy during this time of crisis.

PG&E is targeting additional outreach to particular customer groups. For example, Customer

Service Representatives are making proactive calls to the approximately 1,600 medical baseline customers who did not acknowledge PG&E notifications during the 2019 Public Safety Power Shutoffs. Our new outreach effort seeks to make these potentially vulnerable customers aware of programs they may qualify for, confirm their contact information and help them understand the importance of acknowledging notifications for their safety. PG&E's Customer Relationship Managers are engaging with business customers to address their questions and changing needs relative to COVID-19 impacts to their businesses.

Future Updates

The COVID-19 situation is evolving, and we will continue to adjust our work as necessary to deliver safe, reliable energy and to keep our customers, communities, and employees safe. We will continue to update the CPUC as our plans and guidance change in response to the changing circumstances.

If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink that reads "Meredith E. Allen". The signature is written in a cursive, flowing style.

Meredith E. Allen
Senior Director, Regulatory Relations