

CPUC Request 1

Please provide the California Public Utilities Commission (CPUC) with your company's policies for responding to and continuing operations through the current spread of COVID-19. This should include policies relating to providing safe working environments for your employees and business continuity plans for continuing all business and service delivery operations in the event of further community transmission. As an example, the Centers for Disease Control and Prevention ("CDC") has published Interim Guidance for Businesses and Employers. <https://www.cdc.gov/corona-virus/2019-ncov/community/guidance-business-response.html>.

PacifiCorp Response 1

PacifiCorp has adopted internal policies to ensure safe working environments in response to COVID-19, including but not limited to:

1. Expectations to follow public health authority precautions, as communicated in numerous company messages.
2. A flowchart for workers who believe they have potential COVID-19 exposure. (See Exhibit A in **Confidential Attachment 1** - COVID-19 Assessment and Disinfection Guideline).
3. A procedure to outline actions that the company will take in the event that a worker has a laboratory confirmed case of the COVID-19 virus. (See Exhibit B in **Confidential Attachment 1** - COVID-19 Assessment and Disinfection Guideline).
4. A process for the cleaning and disinfection of shared equipment, surfaces, workstations, tools, and other touched surfaces. (See Exhibit C in **Confidential Attachment 1** - COVID-19 Assessment and Disinfection Guideline)
5. A policy to provide a unified approach to determine a worker's readiness to return to work following a COVID-19 illness or other respiratory illness, including the possibility of unconfirmed COVID-19, or a quarantine. (See **Confidential Attachment 2** - RTW COVID-19)

In addition, PacifiCorp has documented business recovery plans for all critical business functions which are updated and exercised regularly. Essential functions can be performed remotely or transferred between locations. In limited cases, such as control center operators, the functions can only transfer between a small number of specific locations, however all of these functions have at least one available alternate location.

CPUC Request 2

As part of your business continuity plan, please indicate: (1) which essential functions can and cannot be performed remotely or transferred between locations; (2) how your company responds when employees are unable to work at their assigned job sites; (3) how your company is responding to shelter in place orders, including for employees whose homes or job sites are in locations where such orders are in effect; (4) whether continuity planning differs for pandemics versus events such as earthquakes or wildfires; and (5) whether your company has already activated your business continuity plan in response to COVID-19.

PacifiCorp Response 2

- (1) All functions for PacifiCorp's IT and Security departments can either be done remote or via alternate sites.
Currently PacifiCorp's System Operations, Customer Service Center, some IT functions and the Market team cannot work from remote locations and must be on site for their functions.
- (2) The company instituted a work from home policy for personnel located in California, Idaho, Oregon, and Washington with the capability to function remotely. The company also implemented temporary policies to reimburse employees' use of personal cell phone and internet access. In addition, the company implemented a temporary pandemic travel and paid administrative leave policy specific to COVID-19. Copies of these policies are attached (See **Attachment 3** and **Attachment 4**).
- (3) Employees located in areas with stay-at-home orders (currently employees located in California, Idaho, Oregon, and Washington) are required to work from home if they can, accounting for position duties, availability of teleworking equipment and network adequacy. The stay-at-home orders do allow PacifiCorp employees who must work on site the ability to continue to travel to and from work with no restrictions. Employees working remotely are aware of the order and comply with it as it is written.
- (4) PacifiCorp's business recovery plans and technology recovery plans provide flexibility to address a variety of scenarios including local and regional disruptions caused by hazards such earthquake/fire/pandemic and cyber-attacks, so existing plans would apply to pandemics and can be adjusted as needed based on actual circumstances.
- (5) The company is currently working within its emergency response plans. Although the company's business continuity plans have not yet been activated, the company is actively reviewing them and making adjustments based on the dynamic nature of the event.

CPUC Request 3

Please provide any communications distributed to your employees or customers about potential impacts to operations and service that may occur as a result of your company's COVID-19 response.

PacifiCorp Response 3

Pacific Power's communication outreach to customers and employees since the onset of the COVID-19 outbreak have focused on our commitment to safety and service. Moreover, we have actively been communicating with customers about specific service offerings to help them during this difficult and uncertain time.

CUSTOMER COMMUNICATIONS

We are using all available communications channels to reach customers to reinforce our commitment to reliability, help our customers feel safe and reassured that we have their needs (and the needs of our workforce) at the forefront, and provide a variety of ways to help customers through this difficult time.

Messages in our communications cover billing options, energy assistance, payment plans, energy-saving tips and safety.

As a company, we plan for emergencies such as the pandemic we are now experiencing. We have contingency plans for possible interruptions to supply chains, and we have taken a variety of measures to keep our customers and employees safe. As always, we are dedicated to serving our customers with safe and reliable service during this time and beyond.

Press releases:

March 21

<https://www.pacificpower.net/about/newsroom/news-releases/california-covid-19.html>

March 12

<https://www.pacificpower.net/about/newsroom/news-releases/pacific-power-to-suspend-disconnections-in-response-to-covid-19.html>

Webpages:

English

Published March 13

<https://www.pacificpower.net/about/newsroom/service-safety-covid-19.html>

Published March 19

<https://www.pacificpower.net/my-account/payments/ca-emergency-protections.html>

Spanish

Published March 23

<https://www.pacificpower.net/es/servicio-seguridad-covid-19.html>

Social media:

See **Attachment 5** for samples and dates

Bill messages:

English

March 18 through at least April 15 or longer

We're closely monitoring the COVID-19 situation and taking actions to keep the lights on. We've suspended nonpayment disconnections and are here 24/7 to help with payment options. You can rely on us.

Spanish

March 25 through at least April 22 or longer

Seguimos monitoreando la situación de COVID-19 y hemos tomado medidas para mantener su servicio activo. Se han suspendido desconexiones por falta de pago y estamos aquí 24/7 para ayudar con opciones de pago. Puede confiar en nosotros.

EMPLOYEE COMMUNICATIONS

We are keeping our workforce informed of our company's policies and priorities for serving our customers and protecting our employees during this pandemic. We communicate with our employees and managers on a weekly basis using email outreach, weekly newsletters, webcasts and conference calls (as needed), and online bulletin board updates. All employees have a dedicated place on our intranet to submit COVID-19-related questions, with responses to those questions being fielded by our Incident Command team.

Leadership messages (see **Attachment 6**):

March 24 - COVID-19 Update: Stay-at-home orders

March 20 - Keeping the lights on during COVID-19 emergency

March 13 - COVID-19 Update

March 6 - COVID-19 Coronavirus – Important Updates

Currents newsletter (see **Attachment 7**):

March 23 – COVID-19 updates

CPUC Data Request 4

Please provide the following information, if applicable:

- a) Has your company implemented the CDC's interim guidance?
- b) What effects might the spread of COVID-19 have on your call center?
- c) What effects might the spread of COVID-19 have on your credit and collections processes?
- d) Have you taken any actions or are you planning any actions for customers impacted by COVID-19, such as suspending disconnections or implementing bill payment plans?
- e) How will you communicate to the public about COVID-19 and your operations?

PacifiCorp Response 4

- a) Pacific Power has adopted internal practices that comply with several CDC guidance documents, including but not limited to:
 - CDC, Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19), <https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/guidance-business-response.html>, last reviewed by CDC March 22, 2020.
 - CDC, Coronavirus Disease 2019 (COVID-19) Risk Assessment and Public Health Management Decision Making, <https://www.cdc.gov/coronavirus/2019->

[ncov/downloads/public-health-management-decision-making.pdf](https://www.cdc.gov/coronavirus/2019-ncov/downloads/public-health-management-decision-making.pdf), last reviewed by CDC February 28, 2020.

- CDC, Frequently Asked Questions, <https://www.cdc.gov/coronavirus/2019-ncov/faq.html>, downloaded March 22, 2020, last reviewed by CDC March 21, 2020, noting in particular the following: “Can someone who has had COVID-19 spread the illness to others?” and “Can someone who has been quarantined for COVID-19 spread the illness to others?”
 - CDC, Discontinuation of Home Isolation for Persons with COVID-19 (Interim Guidance), <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html>, last reviewed by CDC March 16, 2020.
 - CDC, “Criteria for Return to Work for Healthcare Personnel with Confirmed or Suspected COVID-19 (Interim Guidance)” <https://www.cdc.gov/coronavirus/2019-ncov/healthcare-facilities/hcp-return-work.html> downloaded March 21, 2020, last reviewed by CDC March 16, 2020.
 - CDC, “Evaluating and Testing Persons for Coronavirus Disease 2019 (COVID-19)” <https://www.cdc.gov/coronavirus/2019-nCoV/hcp/clinical-criteria.html>, last reviewed by CDC March 14, 2020
- b) Pacific Power has implemented plans to reduce possible impacts to staffing within our call center. These plans include implementation of social distancing within our call center, support for employees so that they do not come to work sick, opening our backup call center location and testing technology for the ability for some call center employees to work remotely.
- c) Pacific Power has implemented plans to assist customers through this period. Those include waiving late fees, waiving deposits for residential and business customers covered under consumer protection measures, reconnecting customers who had previously been disconnected and forgoing disconnections for non-payment. These plans will likely increase the outstanding balances of some customers and increase the potential for write-offs. Pacific Power will work with customers to address concerns regarding repayment when these temporary measures are lifted.
- d) Consistent with the commission’s consumer protection measures, Pacific Power has suspended disconnections for non-payment and associated fees for one full year from the effective date of March 4, 2020. Customers may enter into payment plans to help pay off the balance owing on their accounts.
- e) Pacific Power is using a multi-channel approach to communicate with our customers to reinforce our commitment to helping them through this difficult and unsettling time. Recently we announced a stay on service disconnections for late payments during the outbreak and we are bolstering our customer outreach on other helpful programs and services, such as energy assistance programs and billing options.

Our COVID-19 communications outreach efforts span multiple communications channels, to include:

- News releases, bill messages and social media posts with information on how we've paused service disconnections for non-payment and are waiving late fees during the COVID-19 event. Social media posts have been published in English and Spanish.
- Website home page messages about our COVID-19 support in English and Spanish. We are also producing a one-page handout, translated in multiple languages, to address customer questions about our COVID-19 support and billing assistance options.
- A multi-touch email campaign will go out to customers starting the week of March 30 and continuing through the month of April with information on how our residential and small commercial customers can take advantage of our online/mobile features, payment plans, energy-saving tips and energy assistance programs.
- Our customer newsletter delivered with printed bills and electronically will run starting in late-April through May with information on billing assistance, payment plans, energy-saving tips, energy usage alerts and more.