



Clay E. Faber
Director – Regulatory Affairs
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, CA 92123
cfaber@sdge.com

March 27, 2020

VIA EMAIL

Lee Palmer
Director – Safety and Enforcement Division
California Public Utilities Commission
300 Capitol Mall
Sacramento, CA 95814

Re: Business Continuity and COVID-19 (Novel Coronavirus) Response Plans

Dear Mr. Palmer,

San Diego Gas & Electric Company (SDG&E) provides this response to Executive Director Alice Stebbins' March 20, 2020 letter requesting information on SDG&E's business continuity and COVID-19 (novel coronavirus) response plans.

This COVID-19 crisis is an unprecedented situation. SDG&E is responding to the emergency consistent with the attached plans and responses. Throughout the crisis, SDG&E remains aware of its status as a component of Critical Infrastructure and its public obligation to maintain safe, reliable, and reasonable service to customers during the COVID-19 emergency. SDG&E's overall pandemic response objective is to maintain essential services, including utility and natural gas, to support the regional public health response and mitigate further social and economic disruption.

Please note that the crisis is rapidly evolving, as is the government response. SDG&E intends to continuously monitor the situation and evaluate the effectiveness of its plans and policies. Accordingly, SDG&E may amend, update, or change these plans and policies in an effort to best meet its obligations to the public, customers, and employees. Attached are SDG&E's detailed responses to the questions posed and relevant attachments are enclosed.

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We look forward to continuing to work with the Commission through this situation.

Respectfully submitted,

/s/ Clay E. Faber
Clay E. Faber
Director – Regulatory Affairs

cc: April Mulqueen, CPUC Executive Division
Billy Blattner, SDG&E
Kirstie Raagas, SDG&E

Encl. SDGE Attachments.zip
CONFIDENTIAL SDGE_Business_Resumption_Plans.zip
Confidentiality Declaration for SDGE Business Resumption Plans.pdf

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INTRODUCTION

In preparing these responses, San Diego Gas & Electric Company (“SDG&E”) is presenting current facts and information regarding the COVID-19 emergency and the company’s response. This is an unprecedented situation unlike any previous disaster. Unlike a physical disaster such as a wildfire or earthquake, the impact of the COVID-19 emergency on the nation, the state of California, and SDG&E’s service territory is constantly changing and there is no set “end date.” The response of the federal, state, and local governments is also rapidly evolving. During this time, SDG&E recognizes its obligations to work with federal, state, and local governments to fulfill its role as a component of Critical Infrastructure, and make efforts to protect its employees, customers, and the public. As the COVID-19 emergency evolves, SDG&E intends to continuously monitor the situation and evaluate the efficacy of its plans and policies. Accordingly, SDG&E may amend, update, or change these plans and policies in an effort to best meet its obligations as needed, and will update the Commission on such measures as requested.

QUESTION 1:

Provide your company’s policies for responding to and continuing operations through the current spread of COVID-19.

RESPONSE 1:

SDG&E’s overall pandemic response objective is to maintain essential services, including electricity and natural gas, to support the regional public health response and mitigate further social and economic disruption as a result of the pandemic. SDG&E’s plan to meet this objective is based on a multi-tiered planning approach.

SDG&E’s Pandemic Response Plan (“Pandemic Plan”) was developed for the purpose of providing an overview of SDG&E-specific actions to prepare for, respond to, and recover from a pandemic. The objectives of the Pandemic Plan include protection of the health of employees and their families, manage critical work and customer service in light of potential unavailability of resources, and protect for knowledge transfer and succession in the event of the unavailability of SDG&E employees. The Pandemic Plan can be adapted to address any type of pandemic (flu, coronavirus, etc.), and while some specifics may vary based on the pandemic type, the overall response and operations remain the same. The Pandemic Plan is intended to focus on the broad categories of preparedness and communication; surveillance and detection; response and containment; and continuity of operations. Attached is a copy of SDG&E’s Pandemic Plan, which was recently updated to address the current COVID-19 pandemic.

The Pandemic Plan complements the Business Resumption Plans (“BRPs”) of individual SDG&E departments. Based on World Health Organization status and regional response stance, the Pandemic Plan directs when each department should begin to implement their BRPs. The attached BRPs are unique to the business units and are structured to address events within a department when:

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- a department or business unit has lost substantial access to its primary facility;
 - a department or business unit has lost substantial access to a critical information technology system or application that is required to recover critical business processes;
 - a significant percentage of a department's or business unit's employees is not able to safely perform their jobs to maintain critical business processes; or
 - another loss occurring to a department or business unit that, in the prudent judgment of the department supervisor, impacts operations.

The BRP outlines how each business unit assesses the potential impact of disruptive events and mitigates the associated risk through plans on how to recover critical business functions in the event of a business disruption. The individual business unit BRP content is based upon criticality and significance of a disruption to an organization and the resulting impact to safe operations, customer service, regulatory compliance or financial status. Organization/departmental functions are designated within one of the following levels of criticality by responsible management, which will determine the scope of the BRP. BRP descriptions are based on worst case events.

SDG&E's BRPs are confidential and are provided pursuant to P.U. Code Section 583, General Order 66-D Revision 1 and D.17-09-023.

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BRP Level	Type	Description
1	Most-Critical/Essential	<ul style="list-style-type: none">• Functions must resume with little or no down time• Loss could result in immediate impact to safe operations• Function not duplicated at more than one business unit
2	Critical	<ul style="list-style-type: none">• Flexible work locations• Functions can tolerate limited downtime (NMT 2-3 days)• May have limited critical support functions• Function generally duplicated
3	Less Critical	<ul style="list-style-type: none">• Can be deferred without significant disruption to business for first 30 days• Working remotely is acceptable• Staff could be utilized in our organizations as necessary

Level 1 BRPs are required to address:

- Specific and dedicated alternate work location
- Detailed resumption tasks, critical business functions, information technology systems and applications that are required to recover critical business processes, resources required for resumption and related procedures and information using the template provided by BRP Program Manager
- Annual certification of review and tabletop exercise
- Annual test of alternate work location
- Employee emergency contact information and vital records needed by employees to perform their duties

Level 2 BRPs are required to address:

- Detailed resumption tasks, critical business functions, information technology systems and applications that are required to recover critical business processes, resources required for resumption and related procedures and information using the template provided by BRP Program Manager
- Annual certification of review and tabletop exercise
- Employee emergency contact information and vital records needed by employees to perform their duties
- Alternate work location for affected employees is preferred but working remotely from home is acceptable

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Level 3 BRPs are required to address:

- method and instructions for employee communication within the department
- employee emergency contact information and vital records needed by employees to perform their duties

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QUESTION 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.

RESPONSE 2:

- 1) As a component of critical infrastructure, SDG&E is an essential services provider of electric and gas service. While there are some departments whose job functions are able to be performed remotely from home, there are other critical operations and core functions that cannot be performed remotely or transferred between locations,¹ including the following:

Transmission and Distribution

- Electric Grid Operations (Grid Control Center)
- Electric Distribution Operations (Distribution Control Center)
- Electric Transmission & Construction (Transmission Linemen and Patrollers)
- Distribution Construction & Operations (Troublemakers, Linemen, and Fault Finders)
- Substation Construction & Maintenance
- Gas Transmission
- Gas Distributions
- Customer Service Field Crews
- Vegetation Management
- Construction Services

Operational Services

- Facilities (site maintenance – more critical in this scenario)
- Transportation/Fleet (vehicle maintenance, Air Operations)
- Supply Management (material management/logistics)
- Environmental Services (field work for inspection, management and protection of environmental resources)

¹ The critical operations and core functions SDG&E identifies here are specifically exempted from California's statewide "Stay at Home" order, as well as San Diego's local guidance addressing essential services.

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Information Technology

- On-site desktop maintenance, network maintenance, infrastructure repair)

Corporate Security

- Emergency Security Operations Center guards

Revenue Service Organization (RSO)

- Opening mail and processing payments; can be shifted to vendor; can be suspended for 30 days

Emergency Management

- if EOC is activated in a non-virtual manner

- 2) Employees with job functions that can work remotely from home are currently working from home. For those employees with job responsibilities outlined in subpart 1) above, they are still reporting to their work location, with appropriate CDC guidelines in place.
- 3) Although California is under a Stay at Home order, SDG&E is an essential service provider, and identified as a component of critical infrastructure per Department of Homeland Security COVID-19 guidance. As discussed in the responses above, there are certain job functions that cannot be performed remotely. Those employees (or their backups) must still report to their work location. These employees have emergency responder cards and/or their employee identification badges in the event they are questioned by authorities as to why they are not abiding to the Stay at Home orders.
- 4) Yes, there is a difference between continuity planning for pandemic events versus events such as earthquakes or wildfires. Continuity planning for a pandemic is based on local, state, and federal orders and involves unique considerations, such as attrition of personnel, risk of exposure, and defining which essential services need to continue for the safety of the community. Pandemic response also deals with an evolving and dynamic scenario that does not terminate at a known date. The challenges and scope of impacts that might flow from a pandemic are unique as compared to disasters associated with events like wildfires and earthquakes, where the beginning and end of the disaster are more clearly defined.

In a wildfire or earthquake scenario, generally, the response is focused on repairing damage and bringing gas and electric services back online. Typically, the disruption and/or degradation of service is clear, whereas in the current pandemic situation the disaster has not yet caused disruption or degradation of service. With respect to COVID-19, currently there are many unknowns as to the full scope and impact of this pandemic. Given the unprecedented nature of this crisis, SDG&E continues to assess the COVID-19 situation and evaluate the effectiveness of its business continuity plans.

- 5) Yes, SDG&E has activated its Business Resumption Plans in conjunction with its Pandemic Response Plan.

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QUESTION 3:

Please also 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.

RESPONSE 3:

Employee Communications

SDG&E all-employee communications that are relevant to ensuring operations are attached. Employee communications are ongoing as SDG&E adapts its work protocols and continues to provide essential services. SDG&E also established and maintains an intranet site where COVID-19-related information is consolidated and continually updated as the situation evolves, for ease of reference by employees.

Customer Communications

In response to the COVID-19 pandemic, SDG&E has engaged in extensive proactive and reactive communications so customers are informed about the company's plans—and steps taken—to: (1) maintain safe and reliable service; (2) protect the health and well-being of customers; (3) help customers who are struggling financially; (4) change the company's planned outage policy to minimize disruption; and (5) provide community assistance for those unable to pay their utility bill, among other relevant topics. Please see the attached samples of customer communications, which include coronavirus-specific web pages, press releases, letters, email, outbound calls and text messages, and facility signage that highlights operational and programmatic changes.

Among other tactics, SDG&E has strategically leveraged social media and updates to sdge.com to reach its customer base. The company has been very deliberate in evaluating how to use paid media to communicate relevant messaging, eliminating those that may be ill-timed given current circumstances and focusing on those that provide the best solutions for our customers. To date, a variety of no-cost and low-cost communications tactics have been employed:

- **Three press releases (in English and Spanish)**
 - March 13, 2020 – Service Disconnections Moratorium
 - March 17, 2020 – Postponing All Non-Critical Planned Outages
 - March 20, 2020 – Plans to Maintain Service Reliability; Energy Sector Employees Designated Essential Critical Infrastructure Workforce
- **E-mails**
 - Mass e-mail to all customers distributed on March 20, 2020 – “Helping You and Your Family Through the Coronavirus Pandemic”
 - Targeted e-mail to major accounts and customers who use specific programs (such as energy audit services, which are now suspended).

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- **Personal outreach**
 - Personal outreach to nonprofits conducted by SDG&E's Community Relations Team
 - Personal outreach to elected officials conducted SDG&E's regional and state public affairs teams
- **Enhancements and Changes to sdge.com to provide relevant pandemic-related information**
 - Created a landing page highlighting SDG&E's coronavirus response and how we are helping customers through the pandemic – sdge.com/coronavirus.
 - Created a new web page with relevant energy savings tips to help customers who are worried about rising energy bills at a time when many people are working and taking care of children at home. – sdge.com/stayathometips.
 - Posted numerous COVID-19 related articles to the SDG&E NewsCenter – sdgenews.com – which is geared toward the media and the public. The articles highlight what SDG&E is doing to respond to the pandemic and support customers.
 - Revamped the home page of sdge.com to highlight programs and services available to help customers during the pandemic, including information on many of the customer financial protections SDG&E implemented in its Emergency Disaster Relief Plan, addressed below
 - Updated sdge.com/outagemap (one of the company's most frequently visited web pages) to let people know that all non-critical planned outages are postponed in order to minimize disruptions for customers amid the pandemic.
 - Updated sdge.com/APL (web page with interactive map highlighting SDG&E branch office payment locations and third-party authorized payment locations) to let visitors know that our branch office payment locations are closed, but customers can pay at alternative payment locations or through the SDG&E online web portal and mobile app.
 - Updated sdge.com/whenmatters (Time Of Use landing page) to provide relevant info about coronavirus-related customer support/assistance and tips for energy savings.
 - Updated sdge.com/eic to inform the public that the facility is closed until at least May 1, and that Workforce, Education & Training classes have either been moved online or cancelled.
- **Signage** (in English and Spanish) for SDG&E facilities whose operations have been modified due to the pandemic.
 - Signs for created for the Energy Innovation Center to highlight the closure of the facility and the transition of in-person classes to online classes
 - Signs for branch office/payment locations to highlight closures and alternative payment options
- **April Bill Onsert**
 - Modified the April onsert to highlight SDG&E's coronavirus landing page.
- **Tailored outbound dialer messages/text messages** to inform customers about critical, safety-related planned outages that need to continue.

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QUESTION 4:

Has your company implemented the CDC's interim guidance?

RESPONSE 4:

SDG&E has implemented the CDC's Interim Guidance for Businesses and Employers to Plan and Respond to COVID-19. In addition, SDG&E continues to closely monitor the COVID-19 situation in concert with local, state and federal health agencies, as well as monitoring and reinforcing the guidance from the CDC. To date, the following actions to have been taken to protect the health and well-being of SDG&E's customers, employees, and communities served:

- Implement the hygiene protocols recommended by the CDC and WHO, such as:
 - Providing additional hand sanitizers throughout SDG&E's facilities;
 - Cleaning facilities more frequently with hospital-grade disinfectants; and
 - Limiting access to critical operational facilities;
- Enforce employee travel restrictions, limit in-person, onsite group meetings, postpone non-essential meetings or events (if they cannot be conducted remotely);
- Encourage and support social distancing, including implementing telework (if supported by job function). In instances where employees must report to their job site, increasing physical space between employees;
- Suspend customer service orders considered non-essential (e.g., inoperative pool heaters, gas logs, barbeques, fire pits, and appliance checkups with no indication of a leak);
- Close all six of SDG&E's branch offices; and
- Temporarily suspended all non-safety related ESA/EE visits.

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QUESTION 5:

What effects might the spread of COVID-19 have on your call center?

RESPONSE 5:

SDG&E's call center continues to provide essential services to customers. The biggest impact to the call center will be absenteeism due to illness or quarantine situations. SDG&E already utilizes an agent-at-home model during normal business operations. As a precautionary measure, SDG&E is expanding the agent-at-home model to deploy additional agents to work from home. This approach should help to alleviate the absenteeism and facilitate the continuation of the call center's important function. For those employees that are reporting to an SDG&E location to work, SDG&E is performing temperature scans to help monitor employee health and access to facilities.

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QUESTION 6:

What effects might the spread of COVID-19 have on your credit and collections processes?

RESPONSE 6:

As a safety precaution, all six of SDG&E's branch offices are closed until further notice to comply with Governor Newsom's "Stay At Home" order, intended to help slow the spread of COVID-19. The primary function of branch offices is to collect payments (cash or check) from SDG&E customers, and to answer billing or credit inquiries a customer may have concerning their account. All branch office locations have drop boxes for customer payments and SDG&E will continue to monitor and process those payments. SDG&E has placed signs at the branch offices letting customers know of the nearest alternate payment location, what number to call in case of an emergency, and other methods of payment such as online or on the phone. As discussed more fully in the response to Question 7 below, SDG&E has also temporarily suspended all disconnections until further notice.

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QUESTION 7:

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?

RESPONSE 7:

Over the past few weeks, SDG&E has proactively taken numerous actions for customers in light of the COVID-19 pandemic. On March 13, 2020, SDG&E voluntarily suspended all non-pay disconnections. Additionally, SDG&E attempted to contact customers previously disconnected between March 4, 2020 and March 12, 2020,² who had not reestablished service. SDG&E reconnected service for customers it was able to contact and implemented flexible payment options up to a 12-month term. If SDG&E has contact with other disconnected customers, SDG&E will reconnect that customer and extend flexible payment arrangements.

On March 19, 2010, SDG&E submitted Advice Letter 3516-E/2854-G, which notified the Commission of SDG&E's implementation of its Emergency Disaster Relief Program for customers impacted by the current COVID-19 pandemic. In sum, SDG&E has enacted the following emergency customer protections for up to one year:

1. Suspension of service disconnection, waiver of security deposits and late payment fees;
2. Implementation of payment plan options; and
3. Support for low-income and medical baseline customers.

These consumer protections are more fully explained in the attached advice letter and will be offered to all SDG&E residential and small business customers within its service territory affected by the COVID-19 emergency. SDG&E will continuously monitor the impact of COVID-19 on its customers and evaluate the effectiveness of the Disaster Relief Program protections. If additional measures or time limits are merited, SDG&E will implement such protections and inform the Commission. SDG&E believes this monitoring is consistent with the Commission's direction in D.19-07-015 that utilities should implement disaster assurance programs to supplement customer protections in such an evolving and unprecedented situation.

SDG&E continues to process rebates (and incentives) for its Energy Efficiency Programs. However, to protect the safety of contractors and the public, SDG&E has suspended all contractor face-to-face interaction including customer outreach, enrollment, installation and inspection work, effective March 20, 2020, until further notice from SDG&E.

² SDG&E has learned that, after 7 days of disconnection, it is increasingly difficult to contact customers, as they have usually moved out.

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SDG&E also temporarily suspended all non-critical health or safety related face-to-face Energy Savings Assistance (“ESA”) programs, effective March 20 and until further notice. Due to the size of the ESA program workforce and the fact that many of these contractors are small businesses and community based organizations, and pursuant to direction from the Commission’s Executive Director, SDG&E offered these contractors a 30 day advance to cover labor costs during the suspension period. For both the ESA and Energy Efficiency programs, SDG&E will continue to monitor and re-evaluate the situation, and may extend the suspension period if the situation warrants.

With respect to planned outages, as previously reported to the Safety and Enforcement Division, SDG&E has scheduled minimal outages outside of safety, wildfire mitigation, and compliance, in an effort to reduce the impacts to our customers, many of whom are impacted by the Stay-at-Home order. Ongoing outages related to wildfire work in and around the Cleveland National Forest may affect a limited number of customers; SDG&E has offered those customers the use of generators installed and maintained by SDG&E to further mitigate outage impacts.

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QUESTION 8:

How will you communicate to the public about COVID-19 and your operations?

RESPONSE 8:

SDG&E will continue to engage in both proactive and reactive communications in response to the COVID-19 pandemic so customers are informed about the company's plans to maintain safe and reliable service, protect the health and well-being our customers, help available to customers through this crisis, provide community assistance for those who are struggling to pay their utility bill, and make changes in the company's planned outage policy to minimize disruption, among other relevant topics.

Proactive communications will continue to include:

- Media outreach in the form of press releases, when appropriate
- Organic and boosted social media posts on Facebook, Twitter and Instagram
- Customer outreach and communications through partnerships with local nonprofit organizations, as well as collaboration with elected officials at local, regional and state levels
- Mass email and targeted email communications to customers
- Ongoing updates to our website, sdge.com
- Ongoing updates on sdgenews.com, our NewsCenter, so the media is kept apprised of the latest developments and can share them with their viewers
- Outbound automated phone/text messages to customers who are impacted by critical planned outages

Other proactive communications in the future may include paid social media campaigns, videos, and/or advertising efforts. For example, SDG&E is currently exploring a variety of communications opportunities, including using the Nextdoor platform to get information out to customers.

Reactive communications will continue to include:

- Responding to customers' questions and concerns via social media, phone calls and video conferences
- Fielding questions from elected officials at the local, state and federal levels
- Responding to media inquiries related to SDG&E's COVID-19 response efforts

SDG&E is committed to doing everything it reasonably can – through multimedia channels and community partnerships – to help customers stay informed about the protections, programs and services it has in place to help them through the pandemic.