

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine
Electric Utility De Energization of Power
Lines in Dangerous Conditions.

R.18-12-005
(Filed December 13, 2018)

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
2022 PUBLIC SAFETY POWER SHUTOFF POST-SEASON REPORT**

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March 1, 2023

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In compliance with California Public Utilities Commission Public Safety Power Shutoff (PSPS) Order Instituting Rulemaking Phase 3 Decision (D.) 21-06-034 and PSPS Order Instituting Investigation D.21-06-014, San Diego Gas & Electric Company (SDG&E) hereby submits this Post-season Report (Attachment A hereto) regarding the Public Safety Power Shutoff (PSPS) events that occurred in SDG&E's service territory between January 1, 2022 and December 31, 2022. As noted herein, there were no such PSPS events in 2022. This report follows the template provided by the Commission's Safety and Enforcement Division (SED).

SDG&E hereby provides the following link to access and download the attachments (Excel workbooks) to its 2022 PSPS Post-season Report: <https://www.sdge.com/PSPS>. Please note that POSTSRs 2A, 2B and 4 are not included given that SDG&E did not have any PSPS events in 2022.

Respectfully submitted,

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Attachment A

**San Diego Gas & Electric Company
2022 Public Safety Power Shutoff Post-Season Report**

Section I – Background: Overarching Regulation

1. Each electric investor-owned utility must file a comprehensive [prior year] Post-Season Report, no later than March 1 of each year, in R.18-12-005 or its successor proceeding. The report must follow a template provided by SED no later than 60 days after SED posts a [prior year] Post-Season Report template on the Commission’s website. Parties may file comments on these reports within 20 days after they are filed and reply comments within 10 days after the final date to file comments.
2. The [prior year] Post-Season Report must include, but will not be limited to: f. Annual report, as applicable, required by Ordering Paragraph 66 of D.21-06-014.
3. To the extent a required item of information is also required to be included in the electric investor-owned utility’s Wildfire Mitigation Plan, the [prior year] Post-Season Report may refer to the electric investor-owned utility’s Wildfire Mitigation Plan rather than repeat the same information; such reference must specify, at minimum, the page and line number(s) for where the required information is contained within the electric investor-owned utility’s Wildfire Mitigation Plan. In cases where this reference is to data, a summary table of the data shall be provided in the report.

Section II – Amendments to Post-Event Reports

A. Regulatory Requirements

1. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must provide aggregate data, as identified above [D.21-06-014, Ordering Paragraph (OP) 65], in an annual report, including aggregate data that may not have been available at the time the utility filed the 10-day post-event report and must contact the Commission’s Safety and Enforcement Division if the utility requires additional guidance to ensure adequate reporting on the requirement to provide information on affected customers in the 10-day post-event reports.
2. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) must address, among other things, each element of Resolution ESRB-8 reporting requirements, as clarified herein, in the 10-day post-event reports, including the below [OP 65] and, if no information is available, PG&E, SCE, and SDG&E must respond to these Resolution ESRB-8 reporting requirements by indicating the reason this information is not available.

B. Direction

- 1. Provide any information missing [including, but not limited to the specific topics listed below] from any Post-Event Report for Public Safety Power Shutoffs (PSPS) in 2022 by:**
 - a. Identify the date name of the PSPS.**
 - b. Identify the Section of the Post-Event Report template for which the missing information will be added.**
 - c. Provide the missing information under that heading.**

N/A. SDG&E did not have any PSPS events in 2022.

- 2. Community Resource Centers: Provide aggregate data, including aggregate data that may not have been available at the time the utility filed the 10-day post-event report:**
 - a. Address and describe each Community Resource Center during a de-energization event.**

N/A. SDG&E did not have any PSPS events in 2022.

- 3. Notification: Provide aggregate data that may not have been available at the time the utility filed the 10-day post-event report:**
 - a. Identify who the utility contacted in the community prior to de-energization and whether the affected areas are classified as High Fire Threat District Tier 1, Tier 2, or Tier 3 (as defined in General Order 95, Rule 21.2-D22);**
 - b. Explain why notice could not be provided at least two hours prior to a de-energization, if such notice was not provided.**

N/A. SDG&E did not have any PSPS events in 2022.

- 4. Restoration: Provide aggregate data, as identified in OP 65, in an annual report, including aggregate data that may not have been available at the time the utility filed the 10-day post-event report:**
 - a. Provide a detailed description of the steps the utility used to restore power.**

N/A. SDG&E did not have any PSPS events in 2022.

Section III – Decision-Specified

A. Education and Outreach

- 1. Include the results of the most recent education and outreach surveys not yet previously reported on, as an attachment to the Post-Season Report. See D.21-06-034, Sections E-1.1. – E.1.4. for specific requirements on the surveys.**

See Appendix E of SDG&E's 2023 AFN plan for its most recent education and outreach survey results.¹

B. Medical Baseline and Access and Functional Needs

- 1. Describe in detail all programs and/or types of assistance, including:**
 - a. Free and/or subsidized backup batteries**
 - b. Self-Generation Incentive Program Equity Resiliency Budget**
 - c. Community Microgrid Incentive Program [sic] ["Microgrid Incentive Program" per D.21-01-018]**
 - d. Hotel vouchers**
 - e. Accessible Transportation to CRCs**
 - f. Any other applicable programs or pilots to support resiliency for persons with access and functional needs and vulnerable populations.**

Mobile Home Park Resilience Program

The Mobile Home Park Resilience Program (MHPR), a sub-program within the Standby Power Program umbrella, offers potential backup resiliency benefits to individuals with access and functional needs. This program provides a clean backup power solution to enhance community resilience within their respective mobile home park with no out-of-pocket expenses for the residents. More specifically, solar panels coupled with a battery system help keep the mobile home park clubhouse powered during a power outage. The clubhouse tends to be a central location where residents can charge phones or laptops, keep medical devices powered, seek air conditioning, or refrigerate medicine in the community refrigerator.

The Generator Grant Program (GGP)

The GGP offers portable battery units with solar charging capacity, leveraging cleaner, renewable generator options to give vulnerable customers a means to keep small devices and appliances charged and powered during PSPS events. The program focuses on customers residing in the HFTD who have experienced one or more PSPS de-energizations and are enrolled in our Medical Baseline Program or flagged in our customer database as having a self-reported disability.

The Generator Assistance Program (GAP)

The GAP offers a \$300 rebate to customers who meet the basic eligibility criteria of residing in Tiers 2 or 3 of the HFTD and having experienced one or more PSPS outage(s). CARE customers meeting these criteria receive an enhanced rebate of \$450. This enhanced rebate is equivalent to a 70 to 90 percent discount on the average portable generator models for lower-income customers. The program also includes portable power stations and offers rebates of \$100, with an additional \$50 for CARE customers. The program provides the option for customers to receive one rebate for a fuel generator and one rebate for a portable power station per household to accommodate various backup power needs

¹ <https://www.sdge.com/sites/default/files/R.18-12-005%20SDGE%202023%20AFN%20Plan%201%2031%202023.pdf>

Microgrid Incentive Program (MIP)

The MIP is a \$200 million program, with additional matching funds for certain islanding-related distribution upgrades, as well as funding clean energy community microgrids targeting disadvantaged and vulnerable populations impacted by grid outages. The MIP seeks to advance microgrid resiliency technology, advance system benefits of microgrids equitably across DVCs, and inform future regulatory resiliency action to the benefit of all ratepayer customers. Please refer to the Joint IOU Proposed MIP Implementation Plan filed with the CPUC on December 3, 2021 for further details.² A proposed decision (PD) on was issued on February 9, 2023³ adopting implementation rules for the MIP and finding that the Joint IOU Proposed Implementation Plan satisfies the requirements of D.21-01-018. The PD also requires that that each investor-owned utility submit a final MIP Handbook via a Tier 1 Advice Letter to the CPUC’s Energy Division. Generally, the MIP Handbooks will be a resource to inform community members and leaders in greater detail about the MIP and community microgrids.

Hotel Stays

SDG&E continues to partner and enhance initiatives with Salvation Army to provide no-cost hotel stays to individuals with AFN, as referred by 211 San Diego and 211 Orange County. These hotel stays are available for the duration of a PSPS, and locations are selected based on accessibility and proximity to a customers’ home or other requested location.

Accessible Transportation

SDG&E continues to enhance its partnership with Facilitating Access to Coordinated Transportation (FACT), a local paratransit partner which provides accessible transportation to individuals with AFN across the entire HFTD during a PSPS. Individuals can utilize this for transportation to CRCs, hotels or other safe locations. FACT is available 7 days a week from 5:30 am-11:00 pm during PSPS.

Other Applicable Programs

211

211 serves as resource hub to connect AFN individuals with services directly provided by partners contracted with SDG&E, as well as more than 1,000 regional CBOs who provide services. 211 provides several unique advantages in that it is available statewide 24/7 and connects individuals with local partners who have “on the ground experience” across the disability and broader AFN community. Additionally, 211 has the ability to conduct Needs Assessments through its trained social workers and escalate needs accordingly to higher tiers of support. In advance of PSPS, 211 will focus on outreach to at-risk customers, including those living in each IOU’s high-fire-risk areas who are eligible for income-qualified assistance programs and rely on life-sustaining medical equipment. The focus during these periods will be to evaluate these customers' resiliency plans, connect them with existing programs that can help them prepare for outages and to assist them in

² <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M428/K469/428469637.PDF>

³ <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M502/K200/502200817.PDF>

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completing applications for these programs including exploring Care Coordination screening outreach efforts conducted by 211.

Food Support

SDG&E has strengthened the pipeline of local food resources for seniors, individuals, and families with AFN by partnering with the San Diego Food Bank, Feeding America, Meals on Wheels and other local food partners to support vulnerable, rural, and tribal communities year-round and during PSPS activations. Food support and gift cards were available for 2022. Additionally in 2022, the San Diego Food Bank and Feeding America had mobile food pantries readily available to support communities impacted by PSPS both with a rural and tribal focus. This is an area of continuous improvement, and SDG&E will explore additional vendors to include for food support in 2023.

- 2. Identify and describe the costs and associated funding source(s) for all partnerships, each unique program and form of assistance (e.g., backup batteries as distinct from hotel vouchers), and any other efforts aimed at mitigating the impacts of public safety partners events on persons with access and functional needs and vulnerable populations.**

Table 1: 2022 Program Costs⁴

Program	Total Cost	Funding Source
Generator Grant Program	\$3,200,022	WMP
Generator Assistance Program	\$407,372	WMP
Mobile Home Park Resilience Program	\$83,569	WMP
Hotel Stays	\$0	Salvation Army, WMP
Accessible Transportation	\$0	WMP
211 San Diego & Orange County	\$511,818	WMP
Food Support	\$0	WMP

- 3. Funding source(s) shall specify applicable utility balancing accounts or other accounting mechanisms, and non-utility funding sources, if applicable.**

For the programs listed above as WMP funded, the applicable memorandum account is WMPMA – Electric.

- 4. Identify any communities or areas not served by utility partnerships with CBOs that provide assistance to persons with access and functional needs or vulnerable populations in preparation for or during a public safety partners event.**

All communities in SDG&E’s service territory are served by utility partnerships that provide assistance for individuals with access and functional needs or vulnerable populations in preparation for or during a public safety power shutoff.

⁴ Since SDG&E did not have any PSPS events in 2022, the incremental costs associated with Hotel Stays, Accessible Transportation and Food Support are \$0.

C. Mitigation

1. **For each proactive de-energization event that occurred during the prior calendar year:**
 - a. **Circuit-by-circuit analysis of mitigation provided from backup power and microgrid pilots.**

N/A. SDG&E did not have any PSPS events in 2022.

D. Public Safety Partners

1. **Identification of all requests for selective re-energization made by public safety partners during a de-energization event, whether each such request was granted or denied, and the reason for granting or denying each such request.**

N/A. SDG&E did not have any PSPS events in 2022.

E. Transmission

1. **Description of the impact of de-energization on transmission.**

N/A. SDG&E did not have any PSPS events in 2022.

2. **Evaluation of how to mitigate and prepare for those impacts in future potential de-energization events.**

Currently SDG&E prepares for transmission impacts by studying the impact of all de-energization of forecasted impacted lines 72 hours in advance. In addition, there are specific lines that are studied and documented that have no impact on the Bulk Electric System (BES). All transmission lines with forecasted impacts are patrolled, cleared of close vegetation, checked for compliance issues, and assessed for structural usage/ pole loading.

3. **Identify and describe all studies that are part of such analysis and evaluation.**

Studies can be broken down into two areas for transmission: Bulk Electric System (BES) reliability and transmission line integrity. BES Reliability studies make sure that if forecasted potential de-energized lines are de-energized, there are no issues for the other transmission lines on the system. Transmission line integrity studies determine the health of components of the transmission line to decide what wind speeds or loading is acceptable for that line to safely handle such that a proactive de-energization can be accomplished.

4. Identify all efforts to work with publicly owned utilities and cooperatives to evaluate the impacts of de-energization on transmission.

SDG&E works with neighboring publicly owned utilities ahead of the event to coordinate which lines have the potential to be de-energized. Upon determining which lines may be de-energized, SDG&E then determines if the neighboring utility will have an impact on SDG&E's Bulk Electric System (BES) reliability or if SDG&E will have an impact on the neighboring utility. Since there were no potential PSPS events in 2022 SDG&E did not need to coordinate with any neighboring utilities.

Section IV – Safety and Enforcement Division-Specified

1. Discuss how your meteorology and fire science predictive models performed over the year. What changes will you make to improve performance?

SDG&E's meteorology and fire science predictive models performed well overall last year, though SDG&E continues to strive for improvement as technology and science evolves. This year SDG&E has two new supercomputers that will be operationalized with an upgraded numerical weather prediction model that has higher resolution and improved parameterized physics packages. In addition, SDG&E will be running a larger number of ensemble weather forecast simulations that will help it better quantify the uncertainty inherent in predictive models.

2. What were the challenges in quantifying risks and benefits in terms of determining the scope (size and duration) of the PSPS you conducted?

N/A. SDG&E did not have any PSPS events in 2022.

3. Explain your communication to customers about the cost/benefit analysis you perform to determine whether to utilize protective equipment and device settings or PSPS during a weather event.

N/A. SDG&E did not have any PSPS events in 2022.

SDG&E automatically opts-in all customers into outage notifications and does not provide additional notifications for specific instances when an unplanned outage is related to the use of Sensitive Relay Profiles. Outside of overnight hours, customers receive a confirmation communication when they are impacted by an unplanned outage. They also receive communications each time the associated outage Estimated Restoration Time (ERT) is updated. Customers receive a final communication once their power is restored. Additionally, while SDG&E does not conduct outreach to customers regarding the specific technical or operational use of sensitive relay settings, SDG&E encourages customers through various methods of outreach to sign up for outage notifications to receive outage information regardless of the outage type or operational method employed.

4. Explain how you fully incorporated public safety partners in your exercise planning. How many were invited to, and attended each planning meeting? Describe your communication efforts-dates and methods-to solicit participation.

To best incorporate our public safety partners, SDG&E used the CPUC’s guidance on who qualifies as a Public Safety Partner. Working with our liaison, SDG&E used the company-compiled list of our Public Safety Partners (over 1000 partners) and reached out to them with invitations to complete a survey requesting partners to share their interest in planning, playing, observing, or supporting the exercises in any other way. There were responses from 72 representatives to the surveys. SDG&E tracked responses and followed-up with each partner based on their indicated levels of participation. SDG&E encouraged all partners to let us know if there were additional parties who should be included, and the company also sent staff to engage in direct ways with known stakeholders at local events such as tribal networking and partner exercises. We then included these partners in our Initial Planning Meeting/Concepts and Objectives Meeting (attendance: 27 TTX, 29 FE), our Midterm Planning and MSEL Review Meeting (attendance: 23 TTX, 28 FE), and our Final Planning Meeting (attendance: 21 TTX, 26 FE). For each meeting, SDG&E communicated the meeting invitation ahead of time, shared a read-ahead one pager for most meetings, and followed up with the slides and customized notes after each session. When stakeholders requested more information, SDG&E followed up with additional small-group personalized meetings to answer any questions and provide additional exercise support. SDG&E ultimately had 118 participants in our tabletop exercise and 121 participants in our functional exercise.

5. Recap the lessons learned from all of your de-energization exercises, the resulting action items, their implementation, and observed consequences.

Table 2: 2022 Lessons Learned from De-energization Exercises

De-energization Exercise	Action Items	Implementation	Consequences
PSPS TTX	With an annual EOC responder attrition rate of 40%, achieving high confidence and competency levels in each notifications response role continues to be an area of focus. Limited Training and Exercise Division resources consistently adapt to substantial challenges to provide responders with the requisite knowledge of response plans, process, and resources to respond	Complete and continued	Training and Exercise now provides new responder training specific to SDG&E in addition to required ICS courses.

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De-energization Exercise	Action Items	Implementation	Consequences
	to incidents safely and effectively. Training & Exercise to offer targeted training for new responders based on frequently asked questions and prior new responder experiences which will facilitate a stronger onboarding.		
PSPS TTX	Develop an IT project scope to include a notifications workflow management and information dashboard, Proposed support solutions should simplify notification processes and enhance abilities to meet compliance requirements.	Planning	Additional IT PSPS support continues to be part of 2023 project queues.
PSPS TTX	SDG&E's AFN program observed opportunities to improve communications with community-based organizations within the High Fire Threat District.	Complete	Communication with community-based organizations based in the High Fire Threat Districts (HFTD) exemplified the need for the utility to continue maintaining consistent communication with these partners and to preemptively mitigate these risks that could impact that communication. K2 and other notification programs were reviewed for efficacy.
PSPS TTX	Limited sandbox environments create challenges in replicating the realism of systems in a simulated environment. Multiple	Planning	SDG&E's IT department is developing a training mode for the PSPS dashboard in 2023 Q1-2. Ongoing discussions are

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De-energization Exercise	Action Items	Implementation	Consequences
	<p>systems and dashboards utilized during the exercise connect to real-world, live data points such as weather or time stamps. Given the limited simulation functionality of our systems in a “training” or “sandbox” environment, participants had to navigate real-world data that did not match the exercise scenario.</p>		<p>being held for future sandboxes.</p>
<p>PSPS FE</p>	<p>Some EOC responders expressed a lack of familiarity with the MS Teams—the organization’s current Incident Management System (IMS)—interface and functionality for certain tasks.</p>	<p>Complete</p>	<p>Training and Exercise now provides new responder training specific to SDG&E in addition to required ICS courses. This course covers navigation and use of MS Teams during activations.</p>
<p>PSPS FE</p>	<p>Opportunities to integrate community collaboration resources were not fully absorbed into the exercise. The SD-LECC is a situational awareness platform that external partners use for information sharing which can be leveraged in exercises. Critical facilities (CFs) are affected by the utility’s shut-offs; our stakeholders in law enforcement and critical infrastructure have more visibility on what to expect.</p>	<p>Planning</p>	<p>SDG&E is having ongoing internal discussions about how to best use InfraGard with future exercises.</p>

De-energization Exercise	Action Items	Implementation	Consequences
PSPS FE	Develop training environments to better test systems during exercises. As identified during past exercises, certain systems such as the PSPS Dashboard and Public Safety Partner Portal had to be simulated with pre-developed data because live systems are tied to actual de-energizations. Additionally, during this exercise only planned PSPS GIS data was able to be shared due to the same issue.	Planning	There continues to be a need for a GIS training environment.

6. Discuss how you fully implemented the whole community approach into your de-energization exercises.

In addition to upholding regulatory requirements, industry standards, and internal goals of excellence, SDG&E strives to involve and keep in mind our whole community in the development of our preparedness plans and procedures. The company works hard to ensure that the roles and responsibilities of our public safety partners and consumers are reflected in our guidance and response materials. To do this, SDG&E plans and executes exercises:

- SDG&E works closely with both our internal and external AFN partners and departments. AFN plans and staff are consulted at every step of exercise and response development. Regular discussions are held throughout the year with our AFN department to ensure full compliance with and support of our AFN requirements and best practices.
- Through invitations to our designated public safety partners to be part of the planning, observing, and playing in our exercises.
- Through outreach to additional public safety partner groups and organizations to be part of the planning, observing, and playing in our exercises.
- Through targeted and meaningful injects that directly addressed partners’ concerns and wants for their goals for our exercise, (for example, including a specific clinic within a PSPS exercise scenario territory so that the partner could fully practice their response procedures as well).
- Through careful review of After-Action Reports, lessons learned, and feedback from our partners in formal and informal data collection.

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Attendance at our PSPS exercises included representatives from local jurisdictions, police and fire agencies, tribal representatives, non-profit organizations, and telecommunications companies.

7. Discuss the complaints you received (as documented in POSTSR4) and any lessons learned and implementation of changed business practices.

N/A. SDG&E did not have any PSPS events in 2022 and therefore did not receive any complaints.

8. How did your PSPS notifications, to both customers and public safety partners/local governments, perform over the year? What changes will you make to improve performance?

N/A. SDG&E did not have any PSPS events in 2022.

Regarding improvements, several enhancements were made in 2022 to SDG&E's Enterprise Notification System (ENS) to improve data consistency across reporting and dashboards specific to PSPS events. By Q1 2023, the enhancements will be tested and evaluated for further improvements in line with the Business Improvement Opportunity. The enhanced ENS data capabilities will support improved accuracy and consistency of data reporting in the post- event reports. Enhancements include:

- Direct sync between the PSPS Dashboard and the ENS Dashboard to ensure customer counts and device lists match
- ENS data directly syncs with mobile platforms such as the Public Safety Partner Portal and mobile app to indicate customers who are de-energized and re-energized
- Enhanced notification reporting section of the ENS dashboard that allows for data on pre-incident, end of day, post incident, and ad hoc reporting to be readily available. Access opened to other key EOC positions to encourage more self-service and wider ability to cross reference and QA/QC data for post event and post season reporting

9. How did your Public Safety Specialists and Public Affairs Representatives deconflict and synchronize operational direction given to local governments' Office of Emergency Services? What lessons did they learn in 2022 and what corrective actions are planned?

SDG&E did not have any PSPS events in 2022 and has not been made aware of any conflicts with local governments Office of Emergency Services in 2022. SDG&E works closely with our local government partners by providing three 24/7 contacts directly into the EOC should any potential conflicts arise. Additionally, local governments are given an opportunity to provide feedback in a post event survey distributed the day after the EOC demobilizes. This survey gauges their level of engagement, level of satisfaction, any complaints, and a comments section. Should any areas of improvement be determined, SDG&E Emergency Management staff would work with the local government to address the issues.

10. What process did your Public Safety Specialists follow to provide situational awareness and ground truth to your EOC? How did the EOC incorporate their input?

SDG&E equivalent of a Public Safety Specialist is the EOC Liaison Officer. The EOC Liaison Officer is responsible for overseeing the external affairs team and conducting appropriate notifications. Additionally, the Liaison Officer provides staff to jurisdictional partners EOCs upon request to provide situational awareness and provides a primary point of contact for all incoming agency representatives assigned to the EOC.

Attachment 1

POSTSR 3: Education and Outreach Costs (Excel File CD Rom)