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Deirdre Walke
ADA Coordinator
Pacific Gas and Electric
Deirdre.walke@pge.com

Tammy Tran
Community Engagement Local Public Affairs
Southern California Edison
Tammy.Tran@sce.com

Bryce Tiernan
Community Outreach & Engagement Supervisor
San Diego Gas and Electric
btiernan@sdge.com

Subject: PSPS and Coordination with Disability Advocates

Dear Public Utilities Community Outreach Liaisons,

We are writing to express our alarm about the public safety power shutoffs (PSPS) and ask that you collaborate and coordinate closely with disability community stakeholders before, during and after future PSPS events.

"The Council advocates, promotes & implements policies and practices that achieve self-determination, independence, productivity & inclusion in all aspects of community life for Californians with developmental disabilities and their families."

On July 18, 2019, disability advocates met with you to discuss your approach to PSPS at the California Office of Emergency Services (CalOES). At that time, advocates stated that the PSPS plan would threaten the safety of people with disabilities. Many advocates there offered to do community in-reach and asked that we be partners in getting out more information about PSPS events. We offered our expertise in thinking through and mitigating the threats to public safety for people with disabilities created by PSPS. The State Council on Developmental Disabilities (SCDD) expressed many of the same concerns at its September 2019 meeting with PG&E.

Since then, we know of some regional follow up and that there is a statewide contract with an advocacy organization that includes one utility company involvement. However, statewide, ongoing communication among multiple disability stakeholders is missing. The community needs more from you. We are ready to help.

Here are some of the concerns we have shared with you and would like to continue to work in collaboration:

- The proposed plan to notify Medical Baseline customers is noble, however utility representatives are unlikely to be equipped to respond to the needs of Medical Baseline customers. The utility agent may be the one person reaching out during a crisis and they must be able to respond to needs beyond what utilities provide. We are interested in helping you develop a plan for how to handle such an event.
- There are many at-risk community members with disabilities who are not Medical Baseline customers. Many likely qualify but do not know about the program or find the requirements to get on the list too burdensome. We can guide you in how state public benefits, such as In-Home Support Services and Regional Centers, have good data about additional people who would benefit from the Medical Baseline program.
- Targeting Medical Baseline customers is not enough. This standard is too low. A PSPS poses risks for people with disabilities beyond the medical baseline criteria. For example, people will be in the dark, with no heat and unable to reach service providers. They will lose refrigerated medications or prepared and critical foods. Also, people will experience disruptions in routines which can be significant for some people with disabilities. These, along with cell phone disruptions that limit critical communication to family and caregivers, can all be a life or death matter to people with disabilities that may not otherwise be on the Medical Baseline program.
- We witnessed many problems in 2019 that can be improved. People desperately need backup power. The few charging stations and generators were not enough to fill the need. Staff did not demonstrate competence in disability culture. Accessible transportation to and from designated resource centers was scant and hard to access.

This is and will continue to be an all-hands-on-deck situation as we reach those who most need to be reached. Our understanding is that PSPS events are here for the foreseeable future, so we ask that each of your utilities commit to the following:


- 1) Directly inform the disability organizations signed below in communication about PSPS events before they happen.

- 2) Directly include the disability advocates signed below in the development of resources your utility is developing.
- 3) Establish direct, regular communication with disability advocates signed below to receive feedback on the impact of PSPS and community need.
- 4) Attend and provide updates at quarterly meetings like the one convened by CalOES in July 2019.
- 5) Develop an action plan to provide systemic backup power and charging stations for individuals who desperately need them during PSPS events.
- 6) Train utility representatives on the needs that arise during PSPS outreach contacts and establish accessible back up support centers in partnership with trusted community resources for agents to contact if they are faced with unfamiliar circumstances.

We are ready to be your reach into the community and advisors in return. We are ready to set up regular communication as we work through this together over the foreseeable future.

Thank you for considering this request. To discuss this further, please contact me at marquezmaria5964@gmail.com or SCDD Executive Director Aaron Carruthers at aaron.carruthers@scdd.ca.gov .

Thank you,



Maria Marquez, Chair
California State Council on Developmental Disabilities, along with:

The Arc California
California Association for Adult Day Services
The Central Coast Children's Foundation
Community Emergency Responses Volunteers of the Monterey Peninsula
Designing Accessible Communities
Disability Action Center
Disability Rights California
FREED Aging and Disability Resource Connection
Independent Living Center of Southern California
Norcal Services for Deaf and Hard of Hearing
Silicon Valley Independent Living Center
Tri-County Independent Living
UCP California
United States Society for Augmented and Alternative Communication

Cc: Vance Taylor, Governor's Office of Emergency Services