November 20, 2013

Advice Letters:
3410-G/4279-E
3410-G-A/4279-E-A

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: PG&E's Proposed Long Term Probability Model Framework for the CARE program

Dear Mr. Cherry,


Sincerely,

Edward F. Randolph, Director
Energy Division
October 21, 2013

Advice 3410-G-A/4279-E-A
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Supplemental: Additional Data for Pacific Gas and Electric Company’s (PG&E) Proposed California Alternate Rates for Energy (CARE) Long-Term Probability Model

This Supplemental Advice Letter (AL) is being submitted to provide additional data requested by the Energy Division (ED) for Advice 3410-G/4279-E, which PG&E submitted on September 3, 2013, in compliance with Ordering Paragraph (OP) 95 in Decision (D.) 12-08-044. The additional data pertains to PG&E’s CARE proposed long-term probability model framework. See Attachment 1 for PG&E’s completed spreadsheet with the requested additional data.

Purpose

PG&E hereby submits this Tier 2 Advice Letter in response to ED’s request of September 24, 2013, for additional information on PG&E’s customers randomly selected for Post-Enrollment Verification (PEV), and data on CARE customers selected for PEV by PG&E’s probability model.

Protests

Pursuant to General Order 96-B, Section 7.5.1, due to the limited nature of this supplemental advice letter, PG&E is requesting the protest period not be reopened by the filing of this supplement.

Effective Date

PG&E requests that this Supplemental Advice Letter 3410-G-A/4279-E-A be approved concurrent with approval of the original Advice Letter 3410-G/4279-E, as supplemented herein, and that the effective date be the same as requested in the original AL: the first day of the month following 30 days from the date of approval.
Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list for A.11-05-017, A.11-05-018, A.11-05-019 and A.11-05-020. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission’s Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: http://www.pge.com/tariffs

Brian Cherry
Vice President, Regulatory Relations

Attachment

Tory N. Francisco – Energy Division
Enrique Gallardo – The Greenlining Institute
**CALIFORNIA PUBLIC UTILITIES COMMISSION**

**ADVICE LETTER FILING SUMMARY**

**ENERGY UTILITY**

---

**COMPANY NAME/CPUC UTILITY NO.**

**Pacific Gas and Electric Company (ID U39 M)**

---

<table>
<thead>
<tr>
<th>Utility Type</th>
<th>Contact Person</th>
<th>Phone #</th>
<th>E-mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ ELC ☑ GAS</td>
<td>Kingsley Cheng</td>
<td>(415) 973-5265</td>
<td><a href="mailto:k2c0@pge.com">k2c0@pge.com</a> and <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
</tr>
<tr>
<td>☐ PLC ☐ HEAT ☐ WATER</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

**EXPLANATION OF UTILITY TYPE**

- ELC = Electric
- GAS = Gas
- PLC = Pipeline
- HEAT = Heat
- WATER = Water

---

**ADVICE LETTER (AL) #: 3410-G-A/4279-E-A**

**TIER: 2**

**SUBJECT OF AL:**

**Supplemental: Additional Data for Pacific Gas and Electric Company's (PG&E) Proposed California Alternate Rates for Energy (CARE) Long-Term Probability Model**

---

**KEYWORDS (CHOOSE FROM CPUC LISTING):**

- Compliance, CARE

---

**AL FILING TYPE:**

- ☑ Monthly
- □ Quarterly
- □ Annual
- ☑ One-Time
- □ Other

---

**IF AL FILED IN COMPLIANCE WITH A COMMISSION ORDER, INDICATE RELEVANT DECISION/RESOLUTION #:**

---

**DOES AL REPLACE A WITHDRAWN OR REJECTED AL? IF SO, IDENTIFY THE PRIOR AL:**

- No

---

**SUMMARIZE DIFFERENCES BETWEEN THE AL AND THE PRIOR WITHDRAWN OR REJECTED AL:**

---

**IS AL REQUESTING CONFIDENTIAL TREATMENT? IF SO, WHAT INFORMATION IS THE UTILITY SEEKING CONFIDENTIAL TREATMENT FOR:**

- No

---

**CONFIDENTIAL INFORMATION WILL BE MADE AVAILABLE TO THOSE WHO HAVE EXECUTED A NONDISCLOSURE AGREEMENT:**

- □ Yes
- ☑ No

---

**NAME(S) AND CONTACT INFORMATION OF THE PERSON(S) WHO WILL PROVIDE THE NONDISCLOSURE AGREEMENT AND ACCESS TO THE CONFIDENTIAL INFORMATION:**

---

**RESOLUTION REQUIRED?**

- ☑ Yes
- □ No

---

**REQUESTED EFFECTIVE DATE:**

- First day of the month following 30 days from the date of approval (Concurrent with Advice 3410-G/4279-E)

---

**NO. OF TARIFF SHEETS:**

- N/A

---

**ESTIMATED SYSTEM ANNUAL REVENUE EFFECT (%):**

- N/A

---

**ESTIMATED SYSTEM AVERAGE RATE EFFECT (%):**

- N/A

---

**WHEN RATES ARE AFFECTED BY AL, INCLUDE ATTACHMENT IN AL SHOWING AVERAGE RATE EFFECTS ON CUSTOMER CLASSES (RESIDENTIAL, SMALL COMMERCIAL, LARGE C/I, AGRICULTURAL, LIGHTING).**

---

**TARIFF SCHEDULES AFFECTED:**

- N/A

---

**SERVICE AFFECTED AND CHANGES PROPOSED:**

- N/A

---

**PENDING ADVICE LETTERS THAT REVISE THE SAME TARIFF SHEETS:**

- N/A

---

**PROTESTS, DISPOSITIONS, AND ALL OTHER CORRESPONDENCE REGARDING THIS AL ARE DUE NO LATER THAN 20 DAYS AFTER THE DATE OF THIS FILING, UNLESS OTHERWISE AUTHORIZED BY THE COMMISSION, AND SHALL BE SENT TO:**

**California Public Utilities Commission**

**Energy Division**

**EDTariffUnit**

**505 Van Ness Ave., 4th Flr.**

**San Francisco, CA 94102**

**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**

**Attn: Brian K. Cherry**

**Vice President, Regulatory Relations**

**77 Beale Street, Mail Code B10C**

**P.O. Box 770000**

**San Francisco, CA 94177**

**E-mail: PGETariffs@pge.com**
### Probability Model Selected CARE PEV Data

<table>
<thead>
<tr>
<th>Program Year</th>
<th>Total CARE Population as of December (or latest date)</th>
<th>Number of CARE Participants Requested to Verify</th>
<th>% of CARE Population Total</th>
<th>Participants Approved (Income Verified as Eligible)</th>
<th>Participants Requested to Verify</th>
<th>% of CARE Population Total</th>
<th>Participants Approved (Income Verified as Eligible)</th>
<th>Participants Requested to Verify</th>
<th>% of CARE Population Total</th>
<th>Participants Approved (Income Verified as Eligible)</th>
<th>Participants Dropped (Due to non-response)</th>
<th>Participants Dropped (Verified as ineligible)</th>
<th>Total Dropped</th>
<th>% Dropped via PEV Process</th>
<th>% of Total CARE Population Dropped</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
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<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
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<tr>
<td>2008</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
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<td>n/a</td>
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<td>n/a</td>
</tr>
<tr>
<td>2009</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
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<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2010</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
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<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2011</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
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<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2012</td>
<td>1,536,237</td>
<td>53,549</td>
<td>3.49%</td>
<td>20,594</td>
<td>20,280</td>
<td>12,675</td>
<td>32,955</td>
<td>61.54%</td>
<td>2.15%</td>
<td>1.66%</td>
<td>2.15%</td>
<td>2.15%</td>
<td>73.05%</td>
<td>1.66%</td>
<td>2.15%</td>
</tr>
<tr>
<td>2013</td>
<td>1,416,398</td>
<td>32,130</td>
<td>2.27%</td>
<td>8,659</td>
<td>18,735</td>
<td>4,736</td>
<td>23,471</td>
<td>73.05%</td>
<td>1.66%</td>
<td>1.66%</td>
<td>3.49%</td>
<td>1.66%</td>
<td>73.05%</td>
<td>1.66%</td>
<td>3.49%</td>
</tr>
</tbody>
</table>

For Year 2010 (as of December)

<table>
<thead>
<tr>
<th>Customer Count (N)</th>
<th>PEV - Returned</th>
<th>PEV - Denied</th>
<th>CARE Participants Dropped (Due to non-response)</th>
<th>Customers not Selected for PEV</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Enrollment by Eligibility Type:

- a) Income Documentation Provided
- b) Self Certified as Categorically Eligible
- c) Self Certified as Income Eligible
- d) Automatic Enrollment (via data sharing, ESA participation, etc.)
- e) Categorical Program Documentation Provided

For Year 2011 (as of December)

<table>
<thead>
<tr>
<th>Customer Count (N)</th>
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<td>N/A</td>
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For Year 2012 (as of December)

<table>
<thead>
<tr>
<th>Customer Count (N)</th>
<th>PEV - Returned</th>
<th>PEV - Denied</th>
<th>CARE Participants Dropped (Due to non-response)</th>
<th>Customers not Selected for PEV</th>
</tr>
</thead>
<tbody>
<tr>
<td>20,594</td>
<td>4,833</td>
<td>7,842</td>
<td>20,280</td>
<td>1,361,737</td>
</tr>
</tbody>
</table>

Enrollment by Eligibility Type:

- a) Income Documentation Provided
- b) Self Certified as Categorically Eligible
- c) Self Certified as Income Eligible
- d) Automatic Enrollment (via data sharing, ESA participation, etc.)
- e) Categorical Program Documentation Provided

Note: PG&E began using the CARE Probability Model for PEV selection in May 2012.

Note: Results are as of September 30, 2013. Requests are through June 30, 2013.
<table>
<thead>
<tr>
<th>Program Year</th>
<th>Total CARE Population as of December (or latest date)</th>
<th>Number of CARE Participants Requested to Verify</th>
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<th>Participants Dropped (Due to non-response)</th>
<th>Total Dropped</th>
<th>% Dropped via PEV Process</th>
<th>% of Total CARE Population Dropped</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>1,107,733</td>
<td>5,643</td>
<td>3,203</td>
<td>2,346</td>
<td>96</td>
<td>2,442</td>
<td>43.27%</td>
</tr>
<tr>
<td>2008</td>
<td>1,136,237</td>
<td>4,408</td>
<td>2,607</td>
<td>1,532</td>
<td>259</td>
<td>1,801</td>
<td>40.86%</td>
</tr>
<tr>
<td>2009</td>
<td>1,351,415</td>
<td>3,760</td>
<td>2,289</td>
<td>1,184</td>
<td>287</td>
<td>1,471</td>
<td>39.13%</td>
</tr>
<tr>
<td>2010</td>
<td>1,499,942</td>
<td>6,294</td>
<td>3,335</td>
<td>2,149</td>
<td>610</td>
<td>2,759</td>
<td>43.84%</td>
</tr>
<tr>
<td>2011</td>
<td>1,532,692</td>
<td>5,261</td>
<td>3,136</td>
<td>1,115</td>
<td>177</td>
<td>2,045</td>
<td>38.87%</td>
</tr>
<tr>
<td>2012</td>
<td>1,536,237</td>
<td>11,392</td>
<td>5,694</td>
<td>4,676</td>
<td>1,022</td>
<td>5,698</td>
<td>30.02%</td>
</tr>
<tr>
<td>2013</td>
<td>1,416,398</td>
<td>9,848</td>
<td>4,155</td>
<td>4,876</td>
<td>817</td>
<td>5,693</td>
<td>57.81%</td>
</tr>
</tbody>
</table>

For Year 2010 (as of December)

<table>
<thead>
<tr>
<th>Customer Count (N)</th>
<th>PEV - Returned Approved (Income Verified as Eligible)</th>
<th>PEV - Customer Terminated</th>
<th>PEV - Denied (Verified as ineligible)</th>
<th>CARE Participants Dropped (Due to non-response)</th>
<th>Customers not Selected for PEV</th>
</tr>
</thead>
<tbody>
<tr>
<td>3,535</td>
<td>389</td>
<td>221</td>
<td>2,149</td>
<td>1,439,599</td>
<td></td>
</tr>
</tbody>
</table>

Enrollment by Eligibility Type:

a) Income Documentation Provided 0.0% 0.0% 0.0% 0.0% 0.0%
b) Self Certified as Categorically Eligible 10.5% 16.5% 5.4% 13.5% 9.8%
c) Self Certified as Income Eligible 80.5% 83.3% 93.7% 86.2% 87.8%
d) Automatic Enrollment (via data sharing, ESA participation, etc.) 9.0% 0.3% 0.9% 0.3% 2.4%
e) Categorical Program Documentation Provided 0.0% 0.0% 0.0% 0.0% 0.0%

Total 100% 100% 100% 100% 100%

For Year 2011 (as of December)

<table>
<thead>
<tr>
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<th>PEV - Returned Approved (Income Verified as Eligible)</th>
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<th>PEV - Denied (Verified as ineligible)</th>
<th>CARE Participants Dropped (Due to non-response)</th>
<th>Customers not Selected for PEV</th>
</tr>
</thead>
<tbody>
<tr>
<td>3,216</td>
<td>132</td>
<td>17%</td>
<td>1,718</td>
<td>1,370,953</td>
<td></td>
</tr>
</tbody>
</table>

Enrollment by Eligibility Type:

a) Income Documentation Provided 0.0% 0.0% 0.0% 0.0% 0.0%
b) Self Certified as Categorically Eligible 15.5% 20.4% 12.0% 24.9% 20.4%
c) Self Certified as Income Eligible 78.9% 78.9% 86.9% 74.5% 74.0%
d) Automatic Enrollment (via data sharing, ESA participation, etc.) 5.6% 0.7% 1.1% 0.6% 5.6%
e) Categorical Program Documentation Provided 0.0% 0.0% 0.0% 0.0% 0.0%

Total 100% 100% 100% 100% 100%

For Year 2012 (as of December)

<table>
<thead>
<tr>
<th>Customer Count (N)</th>
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<th>PEV - Customer Terminated</th>
<th>PEV - Denied (Verified as ineligible)</th>
<th>CARE Participants Dropped (Due to non-response)</th>
<th>Customers not Selected for PEV</th>
</tr>
</thead>
<tbody>
<tr>
<td>5,694</td>
<td>238</td>
<td>724</td>
<td>4,676</td>
<td>1,361,737</td>
<td></td>
</tr>
</tbody>
</table>

Enrollment by Eligibility Type:

a) Income Documentation Provided 0.0% 0.0% 0.0% 0.0% 0.0%
b) Self Certified as Categorically Eligible 16.4% 16.1% 11.6% 21.8% 17.7%
c) Self Certified as Income Eligible 82.4% 82.6% 87.4% 76.3% 77.7%
d) Automatic Enrollment (via data sharing, ESA participation, etc.) 1.2% 1.3% 1.0% 1.9% 4.6%
e) Categorical Program Documentation Provided 0.0% 0.0% 0.0% 0.0% 0.0%

Total 100% 100% 100% 100% 100%

Note: Results are as of September 30, 2013. Requests are through June 30, 2013.
<table>
<thead>
<tr>
<th>Company/Group</th>
<th>Company/Group</th>
<th>Company/Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Light Energy</td>
<td>AT&amp;T</td>
<td>OnGrid Solar</td>
</tr>
<tr>
<td>Alcantar &amp; Kahl LLP</td>
<td>Downey &amp; Brand</td>
<td>Pacific Gas and Electric Company</td>
</tr>
<tr>
<td>Anderson &amp; Poole</td>
<td>Ellison Schneider &amp; Harris LLP</td>
<td>Praxair</td>
</tr>
<tr>
<td>Barkovich &amp; Yap, Inc.</td>
<td>GenOn Energy Inc.</td>
<td>SCD Energy Solutions</td>
</tr>
<tr>
<td>Bartle Wells Associates</td>
<td>GenOn Energy, Inc.</td>
<td>SCE</td>
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<tr>
<td>Braun Blaising McLaughlin, P.C.</td>
<td>Goodin, MacBride, Squeri, Schlotz &amp; Ritchie</td>
<td>SDG&amp;E and SoCalGas</td>
</tr>
<tr>
<td>California Cotton Ginners &amp; Growers Assn</td>
<td>Green Power Institute</td>
<td>SPURR</td>
</tr>
<tr>
<td>California Energy Commission</td>
<td>Hanna &amp; Morton</td>
<td>San Francisco Public Utilities Commission</td>
</tr>
<tr>
<td>California Public Utilities Commission</td>
<td>International Power Technology</td>
<td>Seattle City Light</td>
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<tr>
<td>California State Association of Counties</td>
<td>Intestate Gas Services, Inc.</td>
<td>Sempra Utilities</td>
</tr>
<tr>
<td>Calpine</td>
<td>Kelly Group</td>
<td>SoCalGas</td>
</tr>
<tr>
<td>Casner, Steve</td>
<td>Linde</td>
<td>Southern California Edison Company</td>
</tr>
<tr>
<td>Cenergy Power</td>
<td>Los Angeles Dept of Water &amp; Power</td>
<td>Spark Energy</td>
</tr>
<tr>
<td>Center for Biological Diversity</td>
<td>MAC Lighting Consulting</td>
<td>Sun Light &amp; Power</td>
</tr>
<tr>
<td>City of Palo Alto</td>
<td>MRW &amp; Associates</td>
<td>Sunshine Design</td>
</tr>
<tr>
<td>City of San Jose</td>
<td>Manatt Phelps Phillips</td>
<td>Tecogen, Inc.</td>
</tr>
<tr>
<td>Clean Power</td>
<td>Marin Energy Authority</td>
<td>Tiger Natural Gas, Inc.</td>
</tr>
<tr>
<td>Coast Economic Consulting</td>
<td>McKenna Long &amp; Aldridge LLP</td>
<td>TransCanada</td>
</tr>
<tr>
<td>County of Tehama - Department of Public Works</td>
<td>Modesto Irrigation District</td>
<td>Utility Power Solutions</td>
</tr>
<tr>
<td>Crossborder Energy</td>
<td>Morgan Stanley</td>
<td>Utility Specialists</td>
</tr>
<tr>
<td>Davis Wright Tremaine LLP</td>
<td>NLine Energy, Inc.</td>
<td>Verizon</td>
</tr>
<tr>
<td>Day Carter Murphy</td>
<td>NRG Solar</td>
<td>Water and Energy Consulting</td>
</tr>
<tr>
<td>Defense Energy Support Center</td>
<td>Nexant, Inc.</td>
<td>Wellhead Electric Company</td>
</tr>
<tr>
<td>Dept of General Services</td>
<td>North America Power Partners</td>
<td>Western Manufactured Housing</td>
</tr>
<tr>
<td>Division of Ratepayer Advocates</td>
<td>Occidental Energy Marketing, Inc.</td>
<td>Communities Association (WMA)</td>
</tr>
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</table>