October 6, 2015

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA  94177

Subject: Green Tariff Shared Renewables Marketing Implementation  
Advice Letter (MIAL)

Dear Mr. Jacobson:

Advice Letter 4638-E and 4638-E-A are effective October 1, 2015 per Resolution E-4734.

Sincerely,

Edward Randolph  
Director, Energy Division
August 14, 2015

Advice 4638-E-A
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Green Tariff Shared Renewables Marketing Implementation Advice Letter (MIAL)

Pacific Gas and Electric Company (PG&E) files this advice letter to implement the marketing plan for the Green Tariff Shared Renewables (GTSR) Program enacted by Senate Bill ("SB") 431 in September 2013 and implemented by the California Public Utilities Commission (CPUC or Commission) in Decision (D.)15-01-051, effective January 29, 2015. The GTSR Program approved by the Commission includes both a green tariff (GT) option and an enhanced community renewables (ECR) option.

Purpose

The purpose of this supplemental advice letter is to submit PG&E’s revised GTSR Marketing Implementation Plan with a revised budget and projected budget expenses through 2018.

Background

On January 29, 2015, the Commission approved D.15-01-051 implementing the GTSR Program enacted by SB 43. The Decision also approved PG&E’s Green Tariff Shared Renewables Program, filed in Application (A.)12-04-020, with modifications. The overall program cap is set at 600 MW pursuant to the statute, with allocations to the three investor-owned utilities (IOUs), PG&E, Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E) as follows: 271 MW for PG&E, 269 MW for SCE, and 59 MW for SDG&E.2

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1 Codified in California Public Utilities Code §§ 2831 – 2834. All further references to “Code Section” or “Code §” are to the California Public Utilities Code unless otherwise specified.
2 There are no restrictions on how customer participation is to be divided between Green Tariff and ECR components however, the statute does make specific reservations for (1) 100 MW set aside for facilities no larger than 1 MW in impacted and disadvantaged communities; (2) 100 MW is reserved for participation by residential customers; (3) 20 MW is reserved for City of Davis.
The statute intends the GTSR Program to: (1) expand access “to all eligible renewable energy resources to all ratepayers who are currently unable to access the benefits of onsite generation,”\(^3\) and (2) “create a mechanism whereby institutional customers . . . commercial customers and groups of individuals can meet their needs with electric generation from eligible renewable energy resources.”\(^4\) The GTSR Program is also required to “provide support for enhanced community renewables programs to facilitate development of eligible renewable resource projects located close to the source of demand.”\(^5\)

Ordering Paragraph 2 of D.15-01-051 requires each IOU to file a Tier 3 advice letter regarding the marketing implementation plan for the GTSR Programs and Attachment B of Decision lists the GTSR Implementation Advice Letters to be filed, including the Marketing Implementation Advice Letter (MIAL), including a specific outline of the required content. Specifically, the MIAL is to include the following details:

1. The elements of proposed marketing plans;
2. Estimated budget and metrics;
3. Marketing evaluation plans and schedules;
4. Activities that will be performed;
5. Tools, information, and details that will be provided to customers;
6. Use of multi-lingual messaging and non-digital marketing channels in diverse cultural communities, consistent with SB 43;
7. Role of advisory group and/or description of community outreach efforts;
8. Outreach to low-income and vulnerable customers;
9. Description of how the IOUs will avoid selective marketing in areas where CCA exists or where a CCA implementation plan has been adopted by a local authority;
10. Use of both digital and non-digital enrollment, including website, call center, and hardcopy; and,
11. Proposal for annual marketing and budget plans to be approved, via advice letter. Including quantitative assessments of the effectiveness of the prior year’s marketing campaigns.

**Updated Marketing Implementation Plan**

On May 13, 2015, PG&E filed its Marketing Implementation Advice Letter 4638-E. In July 2015, PG&E and Energy Division staff discussed potential budget reductions which included an eight percent reduction ($117,000) for the first year of the budget from the proposed costs and increasing to a ten percent reduction for 2017 and 2018 ($147,700). The proposed budget reductions over the three-year period reduce the budget by a total

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\(^3\) Code § 2831(b)
\(^4\) Code § 2831(f)
\(^5\) Code § 2833(o)
of $412,400. The planned tactics remain the same as initially presented in the advice letter with only the associated budgets adjusted and reduced for the following areas:

- Frequency of emails planned throughout the year for residential and non-residential customers.
- Non-residential customer service support and toolkit budgets.
- Frequency of retention related eNewsletters.
- Adjustments to plans for employee communications templates developed for businesses to promote their participation.
- Revised plans for the development of PG&E’s webpages, tools, and videos.

The marketing plan attached is a revised version that includes the original budget, revised year one, and now provides year two and three budgets in the table on pages 9 and 10.

**Annual Marketing and Budget Approvals**
PG&E has provided proposed budgets through 2018 in Section D of the attached Revised Marketing implementation plan. PG&E is only requesting approval for the first year expenses incurred during the last half of 2015 for preparation of the program launch in 2016 and expenses incurred in 2016 for execution. Per ordering paragraph 6 in D.15-01-015, PG&E will file a Tier 2 advice letter each year to request approval of the next year’s marketing and outreach budgets. This yearly advice letter will include an assessment of the effectiveness of the prior year’s marketing campaigns, optimize the campaign using lessons learned, and request the budget required.

**Protests**

The Energy Division has indicated that per section 7.5.1 of G.O. 96-B, there will be no protest period for this advice letter. Parties had an opportunity to provide comments or file a protest to the original advice letter filed on May 13, 2015. PG&E’s contact information is included below:

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-7226  
E-mail: PGETariffs@pge.com
Effective Date

PG&E requests that this Tier 3 advice filing become effective upon disposition by a Commission resolution.

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 and the parties on the service list for A.12-01-008, et al. 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/.

/S/
Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List A.12-01-008, et al.
Company name/CPUC Utility No. Pacific Gas and Electric Company (ID U39 E)

Utility type: ☑ ELC  ☐ GAS  ☐ PLC  ☐ HEAT  ☐ WATER
Contact Person: Jennifer Wirowek
Phone #: (415) 973-1419
E-mail: J6ws@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE
ELC = Electric
GAS = Gas
PLC = Pipeline
HEAT = Heat
WATER = Water

Advice Letter (AL) #: 4638-E-A
Tier: 3
Subject of AL: Supplemental: Green Tariff Shared Renewables Marketing Implementation Advice Letter (MIAL)
Keywords (choose from CPUC listing): Compliance
AL filing type: ☐ Monthly  ☐ Quarterly  ☐ Annual  ☑ One-Time  ☐ Other
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.15-01-051
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: N/A
Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: N/A
Resolution Required? ☑ Yes  ☐ No
Requested effective date: Upon Commission Resolution
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

The Energy Division has indicated that per section 7.5.1 of G.O. 96-B, there will be no protest period for this advice letter. Parties had an opportunity to provide comments or file a protest to the original advice letter filed on May 13, 2015.

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: Erik Jacobson
Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
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Attachment A
Green Tariff Share Renewables Program (GTSR)
Marketing Implementation Advice Letter

In preparing this outreach plan, PG&E referenced the guidance and requirements provided in the Green Tariff Shared Renewables (GTSR) Decision for the marketing implementation advice letter\(^1\). PG&E has developed the initial outreach plan to promote both the Green Tariff (GT) and Enhanced Community Renewable (ECR) program options to be executed during the first year of the program.

The marketing plan includes:
A. Marketing Objectives
B. Target Markets
C. Outreach and Messaging Strategy
D. Outreach Channels and Tactics
E. Low-Income and Minority Outreach
F. Metrics and Evaluation Plans & Schedules
G. Estimate Budget
H. Advisory Board
I. Outreach in Community Choice Aggregator Territory
J. Customer Enrollment
K. Customer Tools and Information Availability
L. Effectiveness Marketing Campaigns
M. Discussion of Workshop Feedback

Green Tariff Shared Renewables Marketing Plan
A. Marketing Objectives
The GTSR program will provide PG&E bundled electric customers who are interested in renewable energy the option to support new solar photovoltaic projects within PG&E’s service area through the green tariff option or ECR program options.

\* The customer facing names are currently under development. This plan currently refers to the two Green Tariff Shared Renewables program options as Green Tariff and Enhanced Community Renewables.

\(^1\) D.15-01-051. Page 138
The objective of the marketing and outreach is to provide education and awareness focused on driving acquisition of residential and non-residential customers in the program. PG&E will continually monitor the performance of the outreach messages and tactics utilized during the year and make adjustments based on lessons learned in order to maximize enrollment while maintaining a reasonable cost per acquisition.

In addition, PG&E will drive retention in the program through mandated and non-mandated retention activities that provide awareness of the program’s progress to enrolled customers.

B. Target Markets

Both residential and non-residential customers in PG&E’s territory will be targeted for acquisition into the GTSR program and encouraged to enroll in the Green Tariff or ECR options. During the first year of the program, PG&E will target four sectors of residential customers and four sectors of non-residential customers.

Residential Target Markets

Based on PG&E’s initial analysis of PG&E’s residential customers several groups of PG&E customers will be directly targeted as they are more likely to have an interest and participate in the green energy programs. The initial groups that will be directly targeted include:

1. Former ClimateSmart Program participants will be directly targeted since they are green-minded customers who have previously participated in and paid a premium rate for a green program.

2. Current electric vehicle rate participants who have demonstrated their desire and commitment to seek out and utilize alternative energy sources.

3. Low-income and minority customers will be targeted to expand access to renewable energy to all ratepayers. Per the Decision, PG&E will include outreach to this customer segment once the CARE discount methodology has been resolved in A.14-11-007.

Non-Residential Target Markets

Based on an initial analysis of PG&E’s non-residential customers, PG&E identified several customer segments that are more likely to have an interest in participating in green energy programs. A direct targeting approach will be conducted to the initial residential and non-residential customers segments:

1. Former Climate Smart Program participants will be directly targeted for acquisition given they have already demonstrated they are green-minded customers and are willing to pay a premium for a green program.

2. Small and medium sized businesses initial customer survey research indicated a significant level of interest in the opportunity to participate in a green option program. This segment of customers identified they believe this is a good way for them to demonstrate their commitment to clean energy.

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2 D.15-01-051. Page 130-133
3. City, county, and local government outreach will be conducted with an emphasis placed on the cities that are working towards climate action goals as they are more likely to seek participation in green energy programs that can help achieve set goals.

4. Large Commercial & Industrial (LCI) direct targeted outreach will focus on customers who are members of green business organizations and former ClimateSmart participants.

C. Outreach and Messaging Strategy
PG&E will utilize a test and learn approach to continually optimize the creative to ensure the outreach messages resonate with customers and drive acquisition in the program. In PG&E’s initial customer research, it was determined that several areas are of importance when developing the messaging strategy. The research indicated messaging should:

- Utilize customer-friendly language and simplified explanations that eliminate confusion about the program.
- Communicate the costs in an easy to understand manner to ensure customers are clear about the costs associated with the program.
- Leverage messaging that will resonate with local communities such as helping the environment.
- Utilize segmented messaging and tailor the messages to the various customer segments to highlight what matters most to each group.
- Utilize outreach messaging that provides a clear explanation of how the program works to overcome barriers of mistrust of the intent for the program.

The positioning for residential and non-residential customers will focus on the program being a way for customers with program choices to support clean energy. This program is an alternative to rooftop solar for customers who are unable or unwilling to install rooftop solar but allows another way for green-minded customers to help the environment. The GTSR program options are not intended to compete with customers who have installed or are considering the installation of rooftop solar. PG&E’s positioning and outreach messaging is under development and will continue to be refined preparation for the program launch continues. The current positioning that will help inform message development includes:

<table>
<thead>
<tr>
<th>POSITIONING</th>
<th>Residential</th>
<th>Non-residential</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>The GTSR program provides a solar alternative to green-living customers who cannot or do not want to install solar panels but still want to help the environment.</td>
<td>The GTSR program provides a solar alternative to green-minded businesses who want to offset their energy costs and retain and recruit green-minded employees and customers while helping the environment and meeting other green initiatives.</td>
</tr>
</tbody>
</table>

D. Outreach Channels and Tactics
PG&E plans to conduct a multi-touch multi-wave strategy to reach customers through direct outreach and targeted media. PG&E will conduct a 360° integrated campaign targeting residential
and non-residential acquisition. Focus has been placed on selecting cost-effective tactics that are proven to drive enrollments and maximize program participation while minimizing the cost of acquisition that will be borne by participants in the program. During the first year, PG&E will utilize a test and learn approach with outreach tactics to maximize cost effective acquisition. The initial year will include the following proposed outreach to inform customers of the program:

**Residential Acquisition**

- **Bill Inserts**
  Bill Inserts will be included in the customer’s energy bill package to inform them of the launch of the program and the opportunity to participate.

- **Event participation**
  Events will be conducted at the launch of the program, local offices, community-based organizations, and Electric Vehicle ride and drives.

- **Social Media**
  Social Media will include boosted posts that will promote the program launch and will be timed with earned media to add additional impact. Social Media badges will be developed, and customers can promote their green-minded efforts and participate in the program.

- **Residential e-Newsletter**
  Residential e-Newsletter is utilized as a platform for continuous communications with information to help customers understand energy and information on how they can save by participating in PG&E’s programs or making simple changes at home. As the program launches, the e-Newsletter will be utilized to drive awareness and enrollment into the program.

- **Employee Engagement**
  PG&E employee engagement efforts will be conducted to inform employees of the program so they can serve as ambassadors of the program in their professional capacity and with family and friends. Employees will be encouraged to be green-minded customers and enroll in the program.

- **PG&E website**
  PG&E’s website will include webpage content that includes program information and details on how to enroll to drive acquisition efforts. Customers will also be provided the opportunity to enroll in the program online. In addition, the website will provide quarterly updates regarding the projects in PG&E’s territory.

- **Earned Media**
  Earned Media will be utilized, and press releases will be issued around key program milestones as well as include information in other green program related outreach.
• **Email**
  An Email will promote the launch of the program to capture interest in the program and to promote enrollment as the program is launched, and enrollment opens.

360° Integrated Residential Campaign

Non-Residential Acquisition

• **Direct Mail**
  A targeted direct mail campaign will provide drive acquisition of SMB customers through targeted direct mailers, cross promotion in SMB welcome kits and other rate related direct mail outreach efforts.

• **Email**
  Email prior to the launch of the program will be conducted to promote the upcoming launch of the program and capture early interest in the program and development of a list of customers who want to be notified when the program launches and enrollment opens. After the official launch of the program, a second email outreach will be conducted to notify customers of the program and the opportunity to enroll at that time.

• **Event participation**
  Events will be conducted at the launch of the program, and participation in events such as: The Silicon Valley Leadership Forum, and green business and green technology events.
• **Bill Inserts**  
Bill Inserts will be included in the customer’s energy bill package to inform them of the launch of the program and the opportunity to participate.

• **Promotional Tools**  
PG&E will provide window clings, certificates, and other tools to help businesses demonstrate their environmental leadership and promote the program to other businesses.

• **Social Media**  
Social Media will include boosted posts that will promote the program launch and will be timed with earned media to add additional impact. Social Media badges will be developed for customers to promote their green-minded efforts to participate in the program.

• **SMB e-Newsletter**  
The SMB e-Newsletter is utilized as a platform for continuous communications with information to help customers understand energy and information on how they can save by participating in PG&E’s programs or making simple changes. Prior to the official launch, the GTSR program will include an article that will promote the awareness of the program to garner interest in program enrollment. After the launch of the program, the e-Newsletter will be utilized to drive additional awareness and enrollment into the program.

• **PG&E website**  
PG&E’s website will include webpages that include program information and details on how to enroll to drive acquisition efforts. Customers will also be provided the opportunity to enroll in the program online. In addition, the website will provide quarterly updates regarding the projects in PG&E’s territory.

• **Earned Media**  
Earned Media will be utilized and press releases will be issued around key program milestones as well as include information in other green program related outreach.

• **Energy Solutions and Services Support**  
PG&E’s Energy Solutions and Services Customer Service team members will utilize educational materials to drive enrollments with Small Medium Business (SMB) customers and Large Commercial and Industrial customer segments.
Retention Outreach
PG&E will conduct retention outreach related activities to residential and non-residential customers to ensure Green-e certification requirements are met and encourage retention in the program. The retention efforts will include Welcome Kits, Program e-Newsletters, business signage and employee engagement kits. PG&E will provide tools for the business to promote its environmental leadership, such as through certificates and window clings that highlight its participation in the program.
E. Low-Income and Minority Outreach (Preliminary Plan)

Per requirements of the Decision, PG&E will promote the GTSR program to low-income and minority customers to expand access to renewable energy to all ratepayers to the extent possible. PG&E will begin conducting outreach targeting low-income and minority customers once the application of the discount to California Alternate Rates for Energy (CARE) program has been resolved\(^3\) and ensures that costs of participation are not shifted to non-participants\(^4\).

The low-income and minority customer outreach plan will primarily utilize one-on-one in-person communications to ensure customers fully understand the Green Tariff program and the associated costs for participating in the program. These community based outreach activities will include in-language support to ensure non-English speaking customers are also fully informed of the program enrollment opportunities. PG&E will work to reach the low-income and minority customers segments through:

- Partnering with 64 community outreach contractors and 7 community-based organizations throughout the service territory that currently support PG&E’s CARE program to drive awareness of program during the COC/CBO intake process as they drive awareness of CARE and other low-income programs. The community-based organizations offer services as a total network, supporting 32 languages.
- Partnering with community health outreach events, 148 low-income home energy assistance program (LIHEAP) offices, and 170 relief for energy assistance through community help (REACH) offices to drive awareness of the green tariff to Latino population at events and service offices as they conduct CARE outreach at service locations. The Community Health Outreach Worker project focuses on in-language and cultural relevant outreach and enrollment activities.
- Partnering with PG&E's local customer service offices to drive awareness of the green tariff at local offices while educating customers on PG&E’s low-income programs in targeted cities in PG&E’s territory.
- Conduct a targeted email campaign to CARE customers to explain the GTSR program and participation opportunities.

PG&E will include any relevant updates to the low income and minority outreach plans once the low-income decision has issued a final determination for application the CARE discount for customers enrolling in the GTSR program.

F. Metrics and Evaluations plans & Schedules

PG&E will monitor the metrics and key performance indicators throughout the year and conduct a full quantitative analysis of the campaigns performance at the end of the first year of outreach and each year thereafter. Throughout the year the campaign results will be monitored and tracked by

\(^3\) Low Income Proceeding A.14-11-007
\(^4\) D.15-01-051. Page 130-131
channel to help determine which tactics are the most effective in acquiring customers and will provide necessary insight to make adjustments to the outreach of the program. PG&E will track and evaluate the success of the campaign based on the following types of metrics:

![Metrics Diagram]

G. Revised Estimated Budget

The revised proposed budget below includes outreach expenditures expected for the first year three years of the program. Both the tactics and the associated budgets will be adjusted throughout implementation in efforts based on continuous monitoring of the results of acquisition efforts to achieve the most effective cost per acquisition. The proposed budget includes outreach tactics for residential, non-residential, retention, and other costs that are applicable to both residential and non-residential outreach. The budget may be adjusted throughout the year based on learnings and analysis of program outreach.

<table>
<thead>
<tr>
<th>Revised Proposed Budget</th>
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<tbody>
<tr>
<td><strong>Tactics</strong></td>
</tr>
<tr>
<td>Residential Acquisition</td>
</tr>
<tr>
<td>Direct to Consumer Outreach. (direct mail, email, bill inserts, digital newsletter, etc.)</td>
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<tr>
<td>Collateral (events, low-income community outreach, etc.)</td>
</tr>
<tr>
<td>Non-Residential Acquisition</td>
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<tr>
<td>Direct to Consumer Outreach (Direct Mail, Email, bill inserts, digital newsletter, etc.)</td>
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<tr>
<td>Collateral (Events, etc.)</td>
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<tr>
<td>Customer Service Support</td>
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<tr>
<td>--------------------------</td>
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<tr>
<td>Retention Efforts</td>
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<tr>
<td>Mandated Retention Efforts (Welcome kits, Green e-newsletter)</td>
</tr>
<tr>
<td>Non-Mandated Retention Efforts</td>
</tr>
<tr>
<td>Additional Costs (Residential &amp; Non-Residential)</td>
</tr>
<tr>
<td>Digital (PG&amp;E website, tools, videos) &amp; earned media outreach</td>
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<tr>
<td>Labor &amp; overhead (includes low-income outreach staffing)</td>
</tr>
<tr>
<td>Campaign analysis</td>
</tr>
<tr>
<td>Total Marketing Budget</td>
</tr>
<tr>
<td>Amount reduced from original estimate</td>
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<tr>
<td>Budget reduced from original estimate</td>
</tr>
</tbody>
</table>

* Year 1 revised budget includes late 2015 expenses for development of materials and preparation for the early 2016 program launch and 2016 expenditures.

H. Advisory Board

PG&E has held an initial meeting with stakeholders who have committed to being on the advisory board to provide input and feedback to the development of the program. The goal of the advisory board is to bring a diversity of viewpoints to key decisions and receive input on specific issues, specifically regarding procurement, marketing, and program design.

Each year during the outreach planning process, PG&E will present future marketing plans at a regularly scheduled advisory board meeting to obtain feedback that can be taken into consideration prior to finalizing the plan. This review process with the advisory board will include discussion of the outreach conducted the prior year, and outreach plans the upcoming year. PG&E’s current advisory board members were invited to attend the marketing implementation advice letter workshop held on April 23, 2015 to provide feedback on the proposed outreach plans for the first year of the program. Additional conversations were held to obtain input from advisory board members who were unable to attend the workshop. Based on initial discussions with advisory board members it was determined an upcoming advisory board meeting should include an agenda item to discuss additional community, faith, and green organizations that may be cost effective groups to target for promotion of the GTSR program.

I. Outreach in Community Choice Aggregator Territory
In efforts to ensure fair marketing, PG&E will not unfairly target current and potential CCA customers and will adhere to the CCA code of conduct. Outreach efforts will be conducted across the entire territory to all PG&E customers with direct targeting to the customer segments identified in the target markets section above. PG&E does not plan to conduct any selective marketing or lobbying in an active CCA territory or where a CCA implementation plan has been adopted by a local authority.5

PG&E will comply with all directives of the decision to maintain compliance regarding CCA’s. PG&E will send any materials containing mention of CCA’s or CCA green tariffs for review and approval of the public advisors office. In addition, PG&E will provide a summary of any marketing or lobbying efforts that are subject to the CCA code of conduct6 in the yearly annual reports filed.

J. Customer Enrollment

Customers will have the options to enroll in the green tariff program through PG&E’s website, call center and by hardcopy application. Customers selecting the ECR program option will enroll in the program through the Developer of their ECR facility.

K. Customer Tools and Information available

PG&E will provide customers a variety of tools and information to assist customers in understanding the Green Tariff and ECR program options.

Tools and information available on the program website and sent to customer upon enrollment:

- Green-e Product Content Label will provide customers with information regarding the renewable resource type (solar) in their Green-e Energy certified product, as well as information about the location of the generation.
- Green-e Terms and Conditions will assist customers in understanding the details of the pricing and any terms associated with their participation in Green Tariff or ECR.

Tools and information available on the program website:

- Rate and Environmental Calculator will provide customers interested in enrolling in the Green Tariff program their estimated monthly cost of participation (based on their historical electricity usage, if available), as well as their estimated annual avoided carbon emissions and two environmental equivalency values. This information will also be made available to customers through the call center enrollment process.
- Interactive Resource Map will show customers the location, size, developer and other information regarding GTSR and ECR resources.
- Enrollment Tracker will show communities with the highest level of enrollment in the Green Tariff program.
- Ongoing Environmental Impact Tracker will show the total avoided emissions for the GT and ECR programs.

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5 Decision 15-01-051
6 Decision 15.01.051 page 141
• Residential Customers will also be able to see their personal avoided emissions and environmental equivalency values via the My Rate plan page on the My Energy section of PG&E’s website.
• ECR Developer list will show customers a list of developers with active ECR projects.

L. Effectiveness of prior year’s marketing campaign
PG&E will include an assessment of the effectiveness of the marketing campaigns in driving program interest and enrollments in the annual reports filed. Per the decision, PG&E will file an interim report on August 15, 2015 and will provide information and data for January 1, 2015 through June 30, 2015. Thereafter, Annual reports will be filed annually on March 15th beginning in 2016 and will include an assessment of the effectiveness of the outreach efforts conducted the previous year.

M. Discussion of Workshop Feedback
PG&E presented this marketing plan at a workshop held on April 23, 2015 where the Energy Division, parties to the proceeding, and advisory board members were invited to attend in person or via webinar to learn about the outreach plans. Parties attending the workshop along with advisory board feedback provided valuable feedback for the marketing and outreach plans. The table below outlines PG&E’s consideration of the comments, recommendations, and questions received at the workshop.

<table>
<thead>
<tr>
<th>No.</th>
<th>Workshop Comments, Recommendations &amp; Questions</th>
<th>PG&amp;E’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>What are the enrollment targets?</td>
<td>PG&amp;E’s program does not have a customer number target but is based on reaching the megawatt goal.</td>
</tr>
<tr>
<td>2</td>
<td>Several areas of concern based on experience marketing green programs: 1) PG&amp;E’s targeted cost per acquisition of $75 may be unrealistically low. 2) What will PG&amp;E do if enrollment is slower than expected 3) Feels cost is primary barrier not mistrust of the program intent. 4) Recommends a problem solver message as being the most effective</td>
<td>1) PG&amp;E is targeting to a blended cost per acquisition of $75 by utilizing the budget on tactics that are primarily focused on driving acquisition. 2) PG&amp;E plans to adjust marketing through the year to maximize acquisition in the program. However, if customer enrollments are still low, PG&amp;E will curtail program growth and only sign additional contracts beyond the 50MW as demand indicates. 3) The Green Tariff option will offer both a 50% and a 100% green option to provide options with different price points. 4) PG&amp;E is currently developing outreach messages and will consider this recommendation</td>
</tr>
<tr>
<td>3</td>
<td>Will we amortize costs across the program, so initial customers don’t get hit with all the costs?</td>
<td>Yes. PG&amp;E is looking to amortize 3 or more years to distribute the costs.</td>
</tr>
<tr>
<td>4</td>
<td>How do we define potential CCA and which tactics will reach CCA territories?</td>
<td>PG&amp;E defines a potential CCA if a plan has officially been filed with the city with a CCA proposal. Many of PG&amp;E’s outreach efforts will reach customers across the territory, but there will be no specific targeting of CCA territories.</td>
</tr>
<tr>
<td>5</td>
<td>For Green-e certification Is it okay for the messaging is referring to clean, renewable, solar?</td>
<td>The Center for Resource Solutions advised that Green-e Energy certification guidelines allow use of these terms. The guidelines have restrictions about making general statements without qualifying the statement and advises review of Green-e Energy guidelines as the time of message development to ensure</td>
</tr>
<tr>
<td>Number</td>
<td>Question</td>
<td>Answer</td>
</tr>
<tr>
<td>--------</td>
<td>--------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>6</td>
<td>Will customers who opted out of CCA participation be able to take advantage of PG&amp;E’s GTSR program options?</td>
<td>Yes. Customers who have opted out of participation in a CCA will be able to take advantage of PG&amp;E’s GTSR programs.</td>
</tr>
<tr>
<td>7</td>
<td>Will PG&amp;E’s program include broad marketing across the entire territory?</td>
<td>Yes. PG&amp;E will promote the program across the entire territory but plans to engage customers primarily through direct to customer outreach in addition to a limited amount of digital and earned media.</td>
</tr>
<tr>
<td>8</td>
<td>Will the ECR materials utilized by developers be reviewed? Is it appropriate for Green-e to complete the compliance reviews of materials?</td>
<td>PG&amp;E will comply with the decision requirements to ensure ECR materials are submitted by third parties prior to use and are reviewed to ensure compliance with the Green-e standards. The Center for Resource Solutions advised they do not have the staff to review and ensure compliance with the materials but will provide compliance guidance on their website. She further advised developers must comply with the standards whether or not their materials are audited.</td>
</tr>
<tr>
<td>9</td>
<td>Locational value</td>
<td>If and when locational value is adopted by commission it will be incorporated into the rates.</td>
</tr>
<tr>
<td>10</td>
<td>Will this program be integrated with outreach for other programs?</td>
<td>PG&amp;E is currently considering where it may be appropriate to conduct integrated outreach but must approach it thoughtfully to ensure that no costs are borne by non-program participants.</td>
</tr>
</tbody>
</table>

**Enhanced Community Renewables Marketing Plan**

The enhanced community renewables (ECR) option will be marketed by both PG&E as described in the outreach plans above as well as by third party developers and other interested in selling power to PG&E through ECR.

**PG&E Outreach**

As described above, PG&E’s plans to incorporate ECR outreach into the same outreach methods utilized for Green Tariff outreach to inform customers of both program options available to them under the GTSR program. Additional outreach for ECR will include but is not limited to:

- PG&E’s website will inform customer of the ECR option and direct them to a listing of active projects.
- Information on the ECR option will be included as a part of the e-newsletter sent to residential and non-residential customers.
- Outreach conducted at events will include information on the ECR program option as well as the Green Tariff.

**Third Party Materials Review**

As a prerequisite for participating under this Schedule, an ECR Applicant must provide PG&E with a copy of its proposed marketing plan and marketing materials prior to marketing its ECR Project to any potential ECR Customers and prior to submitting a PPR. PG&E will review the marketing plan and marketing materials for the limited purpose of reviewing whether the materials contain specified compliance with all standards. As PG&E progresses to finalized messaging the Green-e standards will be reviewed again for compliance.
information as outlined on PG&E website, and will provide notice to the ECR Applicant regarding whether the information provided satisfies the criteria. If PG&E, in its reasonable discretion, determines that the marketing plan and/or marketing materials do not meet the criteria, the ECR Applicant must update the materials and re-submit the documentation to PG&E prior to submitting a PPR or marketing its ECR Project to any potential ECR Customers. The Customer Developer Agreement (CDA) is not considered part of the ECR Applicant’s marketing plan or marketing materials and should not be included in the marketing package sent to PG&E for review.
AT&T
Albion Power Company
Alcantar & Kahl LLP
Anderson & Poole
BART
Barkovich & Yap, Inc.
Bartle Wells Associates
Braun Blaising McLaughlin, P.C.

CENERGY POWER
CPUC
California Cotton Ginners & Growers Assn
California Energy Commission
California Public Utilities Commission
California State Association of Counties
Calpine
Casner, Steve
Center for Biological Diversity

City of Palo Alto
City of San Jose
Clean Power
Coast Economic Consulting
Commercial Energy
Cool Earth Solar, Inc.
County of Tehama - Department of Public Works
Crossborder Energy
Davis Wright Tremaine LLP
Day Carter Murphy
Defense Energy Support Center

Dept of General Services
Division of Ratepayer Advocates

Don Pickett & Associates, Inc.
Douglass & Liddell
Downey & Brand
Ellison Schneider & Harris LLP
G. A. Krause & Assoc.
GenOn Energy Inc.
GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Power Institute
Hanna & Morton
In House Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Leviton Manufacturing Co., Inc.
Linde
Los Angeles County Integrated Waste Management Task Force
Los Angeles Dept of Water & Power
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenna Long & Aldridge LLP
McKenzie & Associates
Modesto Irrigation District
Morgan Stanley
NLine Energy, Inc.
NRG Solar
Nexant, Inc.
ORA
Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Praxair
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
SCE
SDG&E and SoCalGas
SPURR
San Francisco Water Power and Sewer
Seattle City Light
Sempra Energy (SoCal Gas)
Sempra Utilities
SoCalGas
Southern California Edison Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
Tiger Natural Gas, Inc.
TransCanada
Troutman Sanders LLP
Utility Cost Management
Utility Power Solutions
Utility Specialists
Verizon
Water and Energy Consulting
Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)
YEP Energy