

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 10, 2019

Advice Letter 5421-E and 5421-E-A

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: Draft of Automated Notification and Telephone Script per D.18-09-044,
O.P.5.**

Dear Mr. Jacobson:

Advice Letter 5421-E and 5421-E-A are effective as of November 2, 2018.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division



Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

July 31, 2019

Advice 5421-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Automated Notification and Telephone Script per Decision 18-09-044, Ordering Paragraph 5

Purpose

Pursuant to Ordering Paragraph (OP) 5 of Decision (D.)18-09-044 and per direction from Energy Division, Pacific Gas and Electric Company (PG&E) submits this supplemental advice letter to present changes to the notification of availability of the California Public Utility Commission (CPUC)'s Solar Consumer Protection Guide that will be sent to PG&E customers who authorize third party access to their usage data.

Background

On September 27, 2018, the California Public Utilities Commission (CPUC or Commission) approved D.18-09-044, *Adopting Net Energy Metering Consumer Protection Measures Including Solar Information Packet*. OP 5 requires the Investor Owned Utilities (IOUs) to "provide notification of the information packet and potential eligibility for low-income solar programs when customers authorize access to their energy usage data via Green Button Connect." The IOUs are also required to submit a Tier 1 advice letter "to present a draft of the automated notification and telephone script, as applicable, that they would provide to customers who elect to share their energy usage data with an energy service provider via Green Button Connect or telephonically." This supplemental filing responds to direction from the CPUC Energy Division provided on July 16, 2019 which requested changes to the notification script.

Discussion

In the request made by Energy Division for a supplemental advice letter, ED staff asked for the following changes to the attachments originally filed in 5421-E:

- Replace the name “Consumer Solar Information Packet” with the current name adopted by the CPUC, “California Solar Consumer Protection Guide”, and add a hyperlink to the guide.
- Move the Consumer Solar Information Packet content to the beginning of the “Considering Solar” section.
- State that the guide has important information on:
 - False Claims to Watch Out For
 - Your Rights
 - Questions to Ask a Solar Provider Before Signing a Contract
 - Solar Financing Options
- Update the last paragraph to include reference to SOMAH instead of MASH.
- Indicate in the advice filing whether this notification script will be translated into Spanish if Share My Data notifications are sent to certain customers in Spanish.

Share My Data (SMD) is a PG&E platform that is consistent with Green Button Connect, a data sharing standard which allows utility customers to automate the secure transfer of their energy usage data to authorized third parties. The platform is based on affirmative (opt-in) customer consent, and under the existing authorization process, PG&E sends an email notification to the email registered with a customer’s “Your Account” profile to confirm that an authorization request has been completed.

In Attachments A and B to this AL, PG&E presents revised versions-responsive to CPUC ED’s feedback-of the notification script to be sent by email once a third party has been authorized to access customer usage data through Share My Data. Attachment A shows the notification that would be sent for authorizations performed online, and Attachment B shows the notification that would be sent for authorizations made through PG&E’s processing of a paper authorization form.

In response to CPUC ED Staff’s feedback received July 16, 2019, the revised email notification scripts first link the recipient to the CPUC’s California Solar Consumer Protection Guide (formerly called the Consumer Solar Information Packet), the English language version of which was made available by the CPUC on July 15, 2019. The scripts then provide links to PG&E’s online solar resources for homes and businesses, as well as links to incentive programs for low-income customers, the Solar on Single-family Affordable Solar Homes (SASH) and Solar on Multifamily Affordable Housing (SOMAH) programs.

The revised email notification scripts incorporate not only the requests/feedback provided by CPUC ED staff, but also slight revisions based on further feedback from a PG&E customer communications expert. Based on this expert feedback, PG&E revised the text

to be more succinct, which we believe will increase the probability that customers will read the text.

As requested by CPUC ED staff to clarify whether the script will be translated into Spanish, the answer is not at this time. PG&E does not currently provide a Spanish or other non-English version of the Share My Data usage notifications, and the solar-specific language presented in Attachments A and B will not be translated into languages other than English.

PG&E does not present a telephone script version of the notification in this supplemental filing, as PG&E does not allow authorization of third-party access to customer usage data by phone, only through online or paper authorization forms.

As indicated in PG&E Advice Letter 5421-E, PG&E may need to modify other elements of the notification in the future to respond to customer needs or regulatory directives related to the authorization of data sharing. PG&E proposes that changes to the Share My Data notification templates that are not related to the directives from OP 5 of D.18-09-044 be made without an advice submittal unless an advice filing is required by a future regulatory directive.

Protests

Pursuant to CPUC General Order 96-B, Section 7.5.1, PG&E hereby requests the protest period be waived.

Effective Date

In conjunction with original Advice 5421-E, this supplemental Tier 1 advice letter is effective November 2, 2018.

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 R.14-07-002 and R.12-11-005. 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 submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service lists for R.14-07-002 and R.12-11-005



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5421-E-A

Tier Designation: 1

Subject of AL: Supplemental: Automated Notification and Telephone Script per Decision 18-09-044, Ordering Paragraph 5

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-09-044

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:

Confidential treatment requested? Yes No

If yes, specification of confidential information: N/A

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: N/A

Resolution required? Yes No

Requested effective date: 11/2/18

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 proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Attachment A – Supplemental Advice 5421-E-A

AUTHORIZATION CONFIRMATION

This email is to confirm that you have authorized <3rd Party Vendor> access to your data using PG&E's Share My Data platform.

You may make updates to this authorization or cancel it at any time by logging in to [Share My Data](#).

If you do not recognize this authorization, please contact us immediately and reference this authorization using the following Subscription ID: <XXXXXXXX>

CONSIDERING ROOFTOP SOLAR?

Know your rights before getting started. Review the [California Solar Consumer Protection Guide](#) for advice on:

- False Claims to Watch Out For
- Your Rights
- Questions to Ask a Solar Provider *Before* Signing a Contract
- Solar Financing Options

Please Note: The California Public Utilities Commission requires solar contractors to obtain a signed copy of the above guide confirming receipt and understanding prior to solar installation.

Additional solar getting started resources and available low-income solar programs:

- [Home](#)
- [Business](#)
- [Low-Income Home Owner incentives \(SASH\)](#)
- [Low-Income Housing Multifamily Housing Incentives \(SOMAH\)](#)

Thanks,
Share My Data Team,
Pacific Gas and Electric Company
77 Beale St., San Francisco, CA 94105
Contact Us: sharemydata@pge.com

PG&E is committed to protecting our customers' privacy. To learn more, please visit: [Privacy](#)<

You are receiving this email because you have registered to use PG&E's Share My Data platform. Please do not reply to this message as the response will not be delivered to the originator.

SMD-013

Attachment B – Supplemental Advice 5421-E-A

AUTHORIZATION CONFIRMATION

We have processed your data sharing authorization form. This email is to confirm that you have authorized <3rd Party Vendor> access to your data using PG&E's Share My Data platform.

If you do not recognize this authorization, please contact us immediately and reference this authorization using the following Subscription ID: <XXXXXXXX>

CONSIDERING ROOFTOP SOLAR?

Know your rights before getting started. Review the [California Solar Consumer Protection Guide](#) for advice on:

- False Claims to Watch Out For
- Your Rights
- Questions to Ask a Solar Provider *Before* Signing a Contract
- Solar Financing Options

Please Note: The California Public Utilities Commission requires solar contractors to obtain a signed copy of the above guide confirming receipt and understanding prior to solar installation.

Additional solar getting started resources and available low-income solar programs:

- [Home](#)
- [Business](#)
- [Low-Income Home Owner incentives \(SASH\)](#)
- [Low-Income Housing Multifamily Housing Incentives \(SOMAH\)](#)

Thanks,
Share My Data Team,
Pacific Gas and Electric Company
77 Beale St., San Francisco, CA 94105

Contact Us: sharemydata@pge.com

PG&E is committed to protecting our customers' privacy. To learn more, please visit: [Privacy](#)

You are receiving this email because you have registered to use PG&E's Share My Data platform.

Please do not reply to this message as the response will not be delivered to the originator.

We respect your privacy. Please review our privacy policy for more information.

<http://www.pge.com/en/about/company/privacy/customer/index.page>

SMD-016

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole	Evaluation + Strategy for Social Innovation	Regulatory & Cogeneration Service, Inc.
	GenOn Energy, Inc.	SCD Energy Solutions
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz & Ritchie	
BART	Green Charge Networks	SCE
	Green Power Institute	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Hanna & Morton	
P.C. CalCom Solar	ICF	SPURR
California Cotton Ginners & Growers Assn	International Power Technology	San Francisco Water Power and Sewer
California Energy Commission	Intestate Gas Services, Inc.	Seattle City Light
California Public Utilities Commission	Kelly Group	Sempra Utilities
California State Association of Counties	Ken Bohn Consulting	Southern California Edison Company
Calpine	Keyes & Fox LLP	Southern California Gas Company
	Leviton Manufacturing Co., Inc. Linde	Spark Energy
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
Casner, Steve	Los Angeles Dept of Water & Power	Sunshine Design
Cenergy Power	MRW & Associates	Tecogen, Inc.
Center for Biological Diversity	Manatt Phelps Phillips	TerraVerde Renewable Partners
City of Palo Alto	Marin Energy Authority	Tiger Natural Gas, Inc.
	McKenzie & Associates	
City of San Jose	Modesto Irrigation District	TransCanada
Clean Power Research	Morgan Stanley	Troutman Sanders LLP
Coast Economic Consulting	NLine Energy, Inc.	Utility Cost Management
Commercial Energy	NRG Solar	Utility Power Solutions
County of Tehama - Department of Public Works		Utility Specialists
Crossborder Energy	Office of Ratepayer Advocates	
Crown Road Energy, LLC	OnGrid Solar	Verizon
Davis Wright Tremaine LLP	Pacific Gas and Electric Company	Water and Energy Consulting Wellhead Electric Company
Day Carter Murphy	Peninsula Clean Energy	Western Manufactured Housing Communities Association (WMA)
		Yep Energy
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		