

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 25, 2019

Advice Letter 5526-E AND 5526-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: Pacific Gas and Electric Company's Revised Implementation Plan for Contribution to the Low Carbon Fuel Standard Statewide Point-of-Purchase Electric Vehicle Incentive Program.

Dear Mr. Jacobson:

Advice Letter 5526-E and 5526-E-A are effective as of May 20, 2019.

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
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Fax: 415-973-3582

October 21, 2019

Advice 5526-E-A
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Pacific Gas and Electric Company's Revised Implementation Plan for Contribution to the Low Carbon Fuel Standard Statewide Point-of Purchase Electric Vehicle Incentive Program

Purpose

Pacific Gas and Electric Company (PG&E) responds to California Public Utilities Commission (CPUC or Commission) request for Supplemental Information for PG&E's Advice Letter 5526-E to provide details on a revised implementation plan to include information on the transition of PG&E's Clean Fuel Rebate to the statewide point-of-purchase program, the Clean Fuel Reward and respond to changes in Resolution E-5015.

Background

On April 18, 2019, PG&E submitted Advice Letter 5526-E to amend its Low Carbon Fuel Standard (LCFS) Implementation plan in response to revisions to the California Air Resources Board (CARB) LCFS regulation which require PG&E and the other California utilities who have opted into the LCFS program to contribute a portion of their LCFS credits to a statewide point-of-purchase electric vehicle reward program, Clean Fuel Reward.

On August 16, 2019 the Commission issued Resolution E-5015 which adopted with modifications Southern California Edison's (SCE) Advice Letter 3982-E, which requested the authorization for SCE to serve as the interim administrator for the statewide utility-run LCFS-funded Clean Fuel Reward point-of-purchase program for electric vehicles.

The launch of the statewide program will trigger the ramp down of PG&E's own rebate program, the Clean Fuel Rebate program, to allow for the transition to the statewide point-of-purchase Clean Fuel Reward program. This supplemental Advice Letter provides more details on how PG&E will sunset its Clean Fuel Rebate program as well as responds to modifications made in E-5015 relevant to PG&E.

Supplemental Information

This document supplements Advice Letter 5526-E by providing more clarity on how PG&E will transition its current Clean Fuel Rebate program to the statewide point-of-purchase program, the Clean Fuel Reward.

PG&E's Clean Fuel Rebate program launched in 2017 as an approved revenue return mechanism of LCFS electric residential credits¹. PG&E electric customers are eligible to receive a one-time rebate for the purchase of a qualified battery electric or plug-in hybrid electric vehicle. There is no limit to how many rebates a customer may receive, however, only one rebate is paid per Vehicle Identification Number (VIN). Customers are able to apply for a rebate for their vehicle at any time after purchase or lease.

In contrast to the Clean Fuel Rebate program which is available only in PG&E's service territory, the Clean Fuel Reward program will be available throughout California. The Clean Fuel Reward program is designed to provide a one-time upfront incentive for the purchase of a new electric or plug-in hybrid electric vehicle.

The Clean Fuel Reward program is currently estimated to begin in Q2 2020. However, a number of details regarding the implementation of the Clean Fuel Reward program remain to be finalized. This includes but is not limited to, the finalization of the Clean Fuel Reward governance agreement and its approval from all involved stakeholders, the issuance of a Request for Proposal (RFP) and selection of third-party implementers, and the implementation schedule throughout the state. Among these, program launch date and program availability throughout PG&E territory, play the most critical role in determining how and when PG&E's Clean Fuel Rebate program will sunset. This is important because PG&E customers will only be eligible for the Clean Fuel Reward or the Clean Fuel Rebate in the case both programs are offered at the same time.

The section below outlines two potential scenarios for how PG&E plans to sunset the Clean Fuel Rebate program and transition to the Clean Fuel Reward program.

Transition Scenarios: PG&E's Clean Fuel Rebate to Statewide Clean Fuel Reward

PG&E presents two likely scenarios for how its Clean Fuel Rebate Program will sunset. The primary goals of both approaches are to encourage participation of electric vehicle customers in either PG&E's rebate program or the statewide reward program, provide customers with clear and easy to understand information regarding program eligibility criteria, and ensure that there are project controls to confirm a customer does not receive incentives from both programs.

PG&E considers Scenario 1 as the most likely to be implemented based on feedback from stakeholders working on the design and implementation of the statewide Clean

¹ As approved in D. 14-12-083

Fuel Reward program. PG&E is also providing Scenario 2 in the event that the timing of program availability throughout the state shifts to begin upon program launch date.

Scenario 1: Clean Fuel Reward program starts Q2 2020 with staggered availability throughout PG&E's territory

In the event that the Clean Fuel Reward program implementer confirms a program start date but the program is not available to all customers throughout PG&E's territory at launch, PG&E will continue to run its Clean Fuel Rebate program in conjunction with the statewide Clean Fuel Reward program to ensure customers have access to either program. During this time of program overlap, vehicles would only be eligible to receive one incentive – either the Clean Fuel Reward or the Clean Fuel Rebate.

Running both programs simultaneously will require coordination with the implementer of the statewide program to ensure that program eligibility is communicated clearly, and that customers only receive either the Clean Fuel Reward incentive or PG&E's Clean Fuel Rebate. PG&E plans to leverage various channels to communicate the transition of the Clean Fuel Rebate program to the statewide Clean Fuel Reward, which will include among other things, updates to PG&E's website and EV pages, and emails to known PG&E EV customers (e.g. past Clean Fuel Rebate applicants and customers on the EV rate).

In addition, PG&E may need to update its rebate program application criteria to better screen applications based on purchase date and location, as well as receive information from the Clean Fuel Reward Program Implementer to screen out customers who have already received a Clean Fuel Reward.²

Scenario 2: Clean Fuel Reward program starts Q2 2020 and is available to all customers throughout PG&E territory at once

In the event that the Clean Fuel Reward Program Implementer confirms that the program will launch and be available throughout all of PG&E's territory, PG&E would then set an application deadline for its Clean Fuel Rebate program to coincide with the start date of the Clean Fuel Reward program. PG&E would also initiate marketing and outreach to electric vehicle customers to inform them of the Clean Fuel Rebate program transition to the Clean Fuel Reward program.

PG&E anticipates providing customers with at least 3 months' notice of the program's sunset to allow customers who have not yet submitted applications for previously purchased vehicles to apply for a rebate. PG&E will work with the Clean Fuel Reward Program Implementer to market program eligibility to customers and PG&E will provide additional information regarding the program sunset through a variety of channels which

² As referenced in the marketing section of PG&E's 2020 Annual Low Carbon Fuel Standard Forecast, page 3 of Advice Letter 5649-E.

may include a combination of the following messaging through digital channels including PG&E website, EV pages, and social media pages, e-mails to known EV customers (e.g. past Clean Fuel Rebate applicants and customers on the EV rate), a press release, and through notification on external digital pages (e.g. the California Air Resources Board CVRP website and CPUC rebate page).³

Rebates will be paid to all eligible customers who apply by the program deadline. If the statewide reward program start date should shift, the application deadline date for PG&E's Clean Fuel Rebate program can be adjusted. Customers that apply after the deadline date will not be eligible for a rebate.

Resolution E-5015 Modifications Relevant to PG&E

On August 16, 2019 the Commission issued Resolution E-5015 which approved with modifications, SCE's Advice Letter 3982-E. PG&E supports these modifications and recognizes specific changes that impact PG&E below.

In Ordering Paragraph 4, the Commission requires SCE submit a Governance Agreement via a Tier 2 Advice Letter. The Governance Agreement covers several areas related to the implementation of the Clean Fuel Reward. One specific area relevant to PG&E is the requirement for rate education in the implementation plan for each investor-owned utility customer receiving the Clean Fuel Reward. PG&E supports the inclusion of this rate education program and will work with SCE to coordinate implementation in PG&E's service territory.

Ordering Paragraph 5 and 8 directs SCE to ensure marketing, education, & outreach efforts are aligned with other state and investor-owned utility efforts around EV rates and residential TOU roll-out. PG&E supports this modification and intends to work with SCE and the Energy Division to align marketing efforts related to the transition from the Clean Fuel Rebate to the Clean Fuel Reward as described in the section above and EV and TOU rate implementation.

Protests

Pursuant to GO 96-B, General Rule 7.5.1, PG&E requests to maintain the original protest and comment period designated in Advice 5526-E and not reopen the protest period.

Effective Date

PG&E requests that this Tier 2 advice submittal be approved concurrent with original advice letter 5526-E with an effective date of May 20, 2019.

³ Ibid.

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.11-03-012 and R.18-12-006. 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 List R.11-03-012 and R.18-12-006



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 U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 5526-E-A

Tier Designation: 2

Subject of AL: Supplemental: Pacific Gas and Electric Company's Revised Implementation Plan for Contribution to the Low Carbon Fuel Standard Statewide Point-of-Purchase Electric Vehicle Incentive Program

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.14-12-083

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:

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:

Resolution required? Yes No

Requested effective date: 5/20/19

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

**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		