

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



November 20, 2019

Advice Letter 4164-G/5666-E

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 Requests 2009-2016 Unspent Funds
the Energy Saving Assistance (ESA) Program.**

Dear Mr. Jacobson:

Advice Letter 4164-G/5666-E is effective as of November 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

October 21, 2019

Advice 4164-G/5666-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company's Requests 2009-2016 Unspent Funds the Energy Saving Assistance (ESA) Program

Purpose

Pursuant to California Public Utilities Commission (Commission or CPUC) Decision (D.) 16-11-022 and D.17-12-009, Pacific Gas and Electric Company (PG&E) hereby requests approval of this Tier 2 Advice Letter to utilize ESA 2009-2016 unspent funds committed to the 2017-2020 program cycle in support of Department of Community Services and Development (CSD) Low-Income Weatherization Program (LIWP) Leveraging. PG&E requests permission to utilize \$392,550 of unspent funds from 2009-2016 committed to Program Year (PY) 2017-2020 to allow CSD to extend its current LIWP inspection process to include the mandatory inspection of ESA attic insulation measures.

Background

The Commission directed the Investor-Owned Utilities (IOUs) to provide CSD funding for ESA measures installed in CSD's Low-Income Weatherization Program (LIWP) in D.16-11-022 modified by D.17-12-009. Section 41.d states:

Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company (four large Investor-Owned Utilities) shall track and report in their annual reports the funding of only measures currently offered by the Energy Savings Assistance (ESA) Program and approved for multi-family households. Using projected installation rates for these measures, coupled with the four large Investor-Owned Utilities' costs for both labor and the measures, the four large Investor-Owned Utilities' are to work with the Department of Community Services and Development (CSD) to calculate the projected funding level for this effort, with the goal of funding the CSD's Low-Income Weatherization Program efforts for those measures provided by the ESA Program, preserving the remaining CSD's funding for use to

install central systems and common area measures not provided by the ESA Program.

The Statewide Energy Savings Assistance Program 2017-2020 Cycle Policy and Procedures Manual in Section 8.4.6 requires mandatory inspections for projects which include attic installation. Section 8.4.6 states:

Policies on inspection waivers vary between mandatory and non-mandatory inspections, as follows:

- **Mandatory inspections** are required for projects which include attic insulation or furnace replacement. For mandatory inspections, three attempts will be made to arrange for a post-installation inspection within 30 calendar days of the notification of job completion. After three such attempts, the inspection provider will send a certified letter to the participant asking for permission to inspect the home. If the participant does not respond to this certified letter within two weeks, the inspection provider need not conduct the inspection but must notify the utility that the inspection could not be completed.

Discussion

PG&E requests authority to utilize \$392,550 of unspent funds from 2009-2016 committed to PY2017-2020 to allow CSD to extend its current LIWP inspection process for mandatory inspection of ESA attic insulation measures.

D.16-11-022 required PG&E to fund ESA measures currently offered by ESA for multifamily customer households participating in CSD's LIWP for multifamily buildings. In 2017, PG&E worked with CSD to project and calculate a funding level for coordinating with CSD's LIWP multifamily whole building efforts. CSD estimated the number of multifamily buildings to be treated in PG&E's service area, and PG&E determined a budget based on projecting the number of ESA measures anticipated to be installed through this coordinated effort, including costs for both labor and measures. As directed by D.16-11-022, PG&E's LIWP coordination budget will be used to fund measures currently offered by the ESA Program approved for multifamily households. PG&E expects this effort will preserve the remaining CSD funds for use to install central systems and common area measures not provided by the ESA Program. PG&E's budget for this effort was included in its Conforming Advice Letter submitted on April 3, 2017¹, and supplemented on June 20, 2017². The Commission issued Resolution G-3531 on December 21, 2017 authorizing PG&E's request.

¹ PG&E Advice 3830-G/5043-E (April 3, 2017).

² PG&E Advice 3830-G-A/5043-E-A (June 20, 2017).

PG&E signed an ESA funding agreement with CSD in February 2019 and is working through implementation details, including inspection of ESA measures installed via LIWP. Through this effort, PG&E and CSD have identified an opportunity to streamline the customer experience by allowing CSD to use its current inspection team to inspect all ESA attic insulation measures. Since the ESA attic insulation measure requires mandatory inspection per the Statewide ESA policy and procedures per Section 8.4.6, PG&E requests \$392,550 from 2009-2016 unspent funds committed to PY2017-2020 to reimburse CSD for performing these mandatory inspections as it is outside of CSD's LIWP inspection process. This funding amount is based on information provided by CSD between August and October 2019 and included the number of properties and units estimated to receive the ESA attic insulation measure.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than November 11, 2019, which is 21³ days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

³ The 20-day protest period concludes on a weekend; therefore, PG&E is moving this date to the following business day.

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 2 advice submittal become effective on regular notice, November 20, 2019, which is 30 calendar days after the date of submittal.

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.14-11-007 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 submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List A. 14-11-007 et. al.



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 U39M)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@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) #: 4164-G/5666-E

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company's Requests 2009-2016 Unspent Funds the Energy Saving Assistance (ESA) 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. 16-11-022 and D. 17-12-009

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: 11/20/19

No. of tariff sheets: 0

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:

**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		