

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 30, 2019

Advice Letter 5686-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: Green Tariff Shared Renewables 2020 Marketing Implementation.

Dear Mr. Jacobson:

Advice Letter 5686-E is effective as of December 13, 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



Meredith Allen
Senior Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code 13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

November 13, 2019

Advice 5686-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Green Tariff Shared Renewables 2020 Marketing Implementation Advice Letter (MIAL)

Pacific Gas and Electric Company (PG&E) hereby submits its proposed 2020 Marketing Implementation Plan for PG&E's 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 advice letter is to request the California Public Utilities Commission (Commission or CPUC) to approve PG&E's 2020 Solar Choice Marketing Plan in accordance with the directives of Ordering Paragraph (OP) 6 of Decision (D.)15-01-051.

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.

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.

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: 272 MW for PG&E, 269 MW for SCE, and 59 MW for SDG&E.²

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 6 of D.15-01-051 requires each IOU to file an annual Tier 2 advice letter regarding the marketing and budget plan for the GTSR Programs.

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.

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.

³ Code § 2831(b)

⁴ Code § 2831(f)

⁵ Code § 2833(o)

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 3, 2019, which is 20 days after the date of this filing. 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

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 filing become effective on a regular notice, December 13, 2019, which is 30 calendar days after the date of filing.

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

Attachment A – Green Tariff Shared Renewables (GTSR) & Enhanced Community Renewables (ECR) 2017 Marketing Implementation Advice Letter

cc: Service List A.12-01-008, 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 U39E)

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) #: 5686-E

Tier Designation: 2

Subject of AL: Green Tariff Shared Renewables 2020 Marketing Implementation Advice Letter (MIAL)

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.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:

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: 12/13/19

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:

Advice 5686-E
November 13, 2019

Attachment A

**Green Tariff Shared Renewables (GTSR) & Enhanced
Community Renewables (ECR) 2017 Marketing
Implementation Advice Letter**

Green Tariff (GT) & Enhanced Community Renewables (ECR) 2020 Marketing Plan Marketing Implementation Advice Letter

PG&E referenced the guidance and requirements provided in the Green Tariff Shared Renewables (GTSR) Decision¹ when developing the marketing implementation advice letter. PG&E developed the 2020 marketing outreach plan to promote PG&E's Solar Choice (Green Tariff) and Regional Renewable Choice (Enhanced Community Renewables) programs.

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 and Schedules
- G. Estimated Budget
- H. Advisory Board
- I. Outreach in Community Choice Aggregator Territory
- J. Customer Enrollment
- K. Customer Tools and Information Availability

¹ D.15-01-051. Page 138

2020 Green Tariff (“Solar Choice”) Marketing Plan

A. Marketing Objectives

The PG&E Green Tariff Shared Renewable (GTSR) programs provide PG&E bundled electric customers the option to support renewable energy within PG&E’s service area through the Green Tariff (GT) or Enhanced Community Renewables (ECR) program option. Below are the marketing objectives for both new customer acquisition as well as the retention of existing customers.

ACQUISITION

- Drive residential and non-residential customer enrollments in PG&E’s GTSR programs.
- Continually monitor outreach effectiveness to maximize enrollment at a reasonable cost per acquisition.

RETENTION

- Keep customers engaged with updates on how their participation is making a difference.

B. Target Markets

Residential

Residential segmentation includes a renter segment in addition to a general/homeowner and low-income segment.

1. Renters: Residential customers with green interests, who tend to be a younger demographic, just starting out in their career, have lower usage bills and lower household incomes.
2. General/Homeowner: Residential customers, who are open to green energy, value the convenience and are unlikely to adopt rooftop solar due to limitations (roof space, shading.) Unlike renters, homeowners tend to be more established in their career and have higher household incomes.
3. Low Income and minority: Customers will be targeted to expand access to renewable energy.

Non-Residential

PG&E will target Non-Residential customers to drive enrollments while maintaining a reasonable cost per acquisition.

1. City, county, and local governments: Focus on cities with climate action goals as they are more likely to be interested in green energy programs that can help achieve set goals.
2. Small and medium sized businesses (SMBs): Focus on customers with willingness to utilize new technologies.
3. Large Commercial & Industrial (LCI): Focus on customers who are members of sustainably-focused businesses or who have developed climate action or other sustainability plans.

C. Outreach and Messaging Strategy

PG&E will optimize the marketing materials using a test and learn approach and update messages to best resonate with customers and drive program enrollment. Below is the proposed 2020 outreach and message strategy, which includes 2019 results and learnings as well as builds in flexibility to adjust as necessary.

Outreach Strategy

- Utilize tactics offering high conversion rates at a low cost per acquisition.
- Target audiences not impacted by CCA conversions.
- Promote acquisition messages at key times of the year proven to have a higher take rate.

Year Four Lessons

- PG&E experienced continued success growing the non-residential segment in part due to using the Business Energy Solutions sales organizations team’s established relationships to enroll commercial customers that value sustainable business practices.
- Rate uncertainty for the first half of the year prevented effective residential outreach to indicate if a “more affordable” message was viable. A message the remaining addressable audience highly values.
- Residential CCA erosion continued to take effect impacting the addressable audience interested in a premium program like Solar Choice.

Positioning

Positioning for residential and non-residential customers will continue to focus on providing customers with an option to support clean energy. This program is an alternative for green-minded customers who are unable to install rooftop solar but still want to help the environment. The PG&E Solar Choice program options are not intended to compete with customers who have installed or are considering the installation of rooftop solar.

Residential	Non-Residential
<p><u>Renter:</u> The PG&E Solar Choice program offers an option for green-minded renters to go solar without the need to install panels.</p> <p><u>Homeowner:</u> The PG&E Solar Choice program offers a convenient option for green-minded customers to go solar without panel installation.</p>	<p>The PG&E Solar Choice program provides an alternative for green-minded businesses, who want to go solar, attract green-minded employees and customers while helping the environment and meeting other green initiatives.</p>

D. Outreach Channels and Tactics

PG&E plans to continue reaching customers through direct outreach and targeted tactics. PG&E will focus on cost-effective tactics, applying 2019 lessons, and utilizing a test-and-learn approach to drive enrollments.

Residential Acquisition Tactics

- **Owned assets/message integration:** Leverage PG&E assets (pge.com website promotional spaces, digital newsletters, etc.) to encourage enrollment.
- **Earned media:** Utilize earned media by issuing press releases around key program milestones as well as incorporate PG&E Solar Choice messaging in other related program materials (i.e. Electric Vehicle rate communications), as appropriate. To help promote the program, PG&E will incorporate customer testimonials.
- **Email outreach:** Continue to promote the benefits of the program to capture interest and drive enrollments cost efficiently. Capitalize on seasonal messaging to be relevant and increase program interest (i.e. Earth Day).
- **Call Center Initiatives:** Explore initiatives to cost-effectively translate existing customer touch points with the call centers to drive enrollments via pay-for-performance.

Non-Residential Acquisition

- **Owned assets/message integration:** Leverage PG&E assets (pge.com website promotional spaces, digital newsletters, etc.) to encourage enrollment.
- **Earned media:** Utilize earned media by issuing press releases around key program milestones as well as incorporate PG&E Solar Choice messaging in other related program materials, as appropriate. To help promote the program PG&E will incorporate customer testimonials and utilize third party endorsements.
- **Email outreach:** Continue to promote the benefits of the program to capture interest and drive enrollments cost efficiently. Capitalize on seasonal messaging to be relevant and increase program interest (i.e. Earth Day).
- **Small, Medium Sized Business/ Large, Commercial, Industrial Customer support:** Provide educational outreach materials to our Business Energy Solutions team to engage customers.
- **Call Center Initiatives:** Explore initiatives to cost-effectively translate existing customer touch points, such as new service starts, to drive enrollments.

Retention Outreach

PG&E will conduct outreach 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 Newsletters, business signage and employee engagement kits. PG&E will provide tools for businesses to promote its environmental leadership through certificates and window clings that highlight its participation in the program.

E. Low-Income and Minority Outreach

PG&E will promote the PG&E Solar Choice program to low-income and minority customers to expand access to renewable energy to all customers to the extent possible. In D.18-06-027 from June 2018, the CPUC created two new Green Tariff programs specifically designed for customers in disadvantaged communities (DACs), the DAC-GT and the Community Solar Green Tariff (CS-GT) programs. These new programs are specifically focused on certain geographies in PG&E's service

territory that are particularly affected by socio-economic, environmental and health impacts², and are directed at low-income as well as non-low-income target audiences. To not duplicate outreach efforts to low-income customers under the new DAC Green Tariff programs and the existing GTSR programs, the low-income outreach under Solar Choice will focus on low-income populations outside of DACs.

The low-income and minority customer outreach plan will primarily utilize community-based outreach activities including in-language support to ensure non-English speaking customers are fully informed of the program. One-on-one in-person communications may help customers fully understand the PG&E Solar Choice program and the associated costs for participating in the program. PG&E will work to reach the low-income and minority customers segments through:

- Partnering with 42 community outreach contractors and 9 community-based organizations throughout the service territory that currently support PG&E's California Alternative Rates Energy (CARE) program. The CARE program offers discounted rates to qualified customers below a certain household income level and may overlap with the intended Solar Choice low income and minority customer target. PG&E will provide educational program information to community outreach contractors and community-based organizations that can be shared with customers as their energy options are discussed.
- Partnering with community health outreach events, low-income home energy assistance program (LIHEAP) offices, and relief for energy assistance through community help (REACH) offices to drive awareness of the PG&E Solar Choice program with the Latino population at events and service offices as they conduct CARE outreach at service locations.³ 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 PG&E Solar Choice program at local offices while educating customers on PG&E's low-income programs in targeted cities in PG&E's territory.

F. Metrics and Evaluations Plans and Schedules

PG&E has established criteria for tracking and measuring success to maximize enrollments. PG&E's 2019 year-to-date email marketing results are listed below. The cost per acquisition for email conversion is \$27.16 per enrollment⁴.

² These "disadvantaged communities" are defined as a community that is identified, by using CalEnviroScreen 3.0, as among the top 25 percent of communities statewide. In addition, 22 census tracts in the highest 5 percent of CalEnviroScreen's Pollution Burden, but that do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data, are also designated as DACs.

³ Quantity of program offices to be determined.

⁴ Labor costs excluded. Metrics cover most current data available YTD Jan-Oct 2019.

Marketing Tactic	In Market Timing	Marketing Key Performance Indicators	Results
Email	-4/22 -9/23	- Open rate: 22-25% - Click through rate: 1.2-1.6% - Enrollment: 0.03-0.05%	Open rate: 25.1% Click through rate: 0.94% Enrollment: 0.05%

G. GT and ECR Estimated Budget

The budget below includes outreach expenditures expected for 2020. PG&E will monitor performance results throughout the year and optimize the plan accordingly to achieve an effective cost per acquisition. The proposed budget includes outreach tactics for residential, non-residential, acquisition and retention, and other costs that are applicable to both residential and non-residential outreach.

2019 Estimated Budget		
Tactics	Year 4 - 2019	Customer Segment
Residential Acquisition		
Direct to Consumer Outreach. (email, message integration, etc.) Collateral low-income community outreach, etc.)	\$ 95,000	Residential
Non-Residential Acquisition		
Direct to Consumer Outreach (Email, message integration, digital newsletter, etc.) Customer Service Support (toolkits and support staff time for efforts)	\$ 50,000	Small and Medium Sized Businesses and Large Commercial Customers
Retention Efforts		
Mandated Retention Efforts (Welcome kits, Green e-newsletter)	\$ 30,000	All
Additional Costs (Residential & Non-Residential)		
Earned Media Outreach Labor & overhead (includes low-income outreach staffing)	\$ 125,000	N/A
Total Marketing Budget	\$300,000	

*Note: Adjustments to the tactics and budgets will be made throughout implementation in efforts to maximize acquisition into the program.

H. Advisory Board

Each year during the outreach planning process, PG&E presents its future marketing plans at a regularly scheduled advisory board meeting to obtain stakeholder feedback so that comments can be taken into consideration prior to finalizing the plan. The advisory board review process includes a discussion of the outreach conducted the prior year and outreach plans for the upcoming year. PG&E shared the Year Five plan to the advisory board via email on September 25, 2019.

I. Outreach in Community Choice Aggregator Territory

PG&E will not unfairly target current and potential CCA customers and will adhere to the CCA Code of Conduct. Hence, outreach efforts will be limited to PG&E bundled 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 authority⁵. Further, when available, PG&E tries to exclude CCA customers from marketing activities.

PG&E will comply with all directives of the decision to maintain compliance regarding CCAs. PG&E will send any materials containing mention of CCAs or CCA green tariffs for review and approval by 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

Solar Choice customers will have the option to enroll in the program through PG&E's website, call center and by hardcopy application. Customers selecting Regional Renewable Choice program option will enroll in the program through the Developer of their ECR facility.

K. Customer Tools and Information Available

PG&E provides customers a variety of tools and information to assist in understanding the PG&E Solar Choice and Regional Renewable Choice program options.

Tools and information available on the PG&E website and sent to customer upon enrollment:

- The Green-e Product Content Label provides 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.
- The Green-e Terms and Conditions will assist customers in understanding the details of the pricing and any terms associated with their participation in PG&E Solar Choice or Regional Renewable Choice program.

Tools and information available on the PG&E website:

- A Rate Calculator will provide customers interested in enrolling in the PG&E Solar Choice program their estimated monthly cost of participation (based on their historical electricity usage, if available). This information will also be made available to customers through the call center enrollment process.
- An Interactive Resource Map will show customers the location, size, developer and other information regarding PG&E Solar Choice resources.
- An ECR Developer list will show customers a list of developers with active ECR projects.

⁵ Decision 15-01-051

⁶ Decision 15.01.051 page 141

2020 Enhanced Community Renewables (“Regional Renewable Choice”)

Marketing Plan

The ECR option will be marketed by both PG&E (as described in the outreach plans above) and third-party developers, as well as by others interested in selling power to PG&E through ECR. Additionally, PG&E will work towards facilitating customer and developer interaction to help program adoption.

PG&E Outreach

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

- PG&E’s website will inform customer of the Regional Renewable Choice option and direct them to a listing of active projects.
- Information on the Regional Renewable Choice option will be included as a part of the newsletter sent to residential and non-residential customers.
- Outreach conducted at events will include information on the Regional Renewable Choice program option as well as Solar Choice.
- PG&E will provide customer disclosures, posted on its website as well as sent to customers, within 60 days of enrollment (i.e. when the customer will begin to receive a bill credit from the utility) and re-submitted annually at re-enrollment. The customer disclosures will include a brief description of the program, cancellation process, pricing information, and default electricity mix.

Third Party Materials Review

Decision 15-01-051 requires PG&E to review all developer marketing materials before they are used to market to customers. All developer marketing materials must comply with the following:

- Green-e Energy Developer and Generator Requirements⁷
- The California Public Utility Commission’s Community Choice Aggregation Code of Conduct⁸, which includes marketing and outreach requirements relative to Community Choice Aggregation.
- Must be truthful, accurate and not false or misleading.

More information can be found on PG&E’s Regional Renewable Choice website⁹ under the program-specific requirements for developers which links to both the Green-e guidelines in a document called “The California Enhanced Community Renewables Information for Developers and Generators” and the CCA Code of Conduct. Developers must include PG&E’s disclaimer and logo usage guidelines if the PG&E logo is used on the materials.

⁷ <https://www.green-e.org/docs/energy/ecr/ECR%20Developer%20Requirements.pdf>

⁸ Decision 12-12-036. Decision Adopting A Code Of Conduct And Enforcement Mechanisms Related to Utility Interactions with Community Choice Aggregators, Pursuant to Senate Bill 790. December 20, 2012.

⁹ https://www.pge.com/en_US/for-our-business-partners/energy-supply/electric-rfo/wholesale-electric-power-procurement/regional-solar-choice-program.page

To follow this prerequisite for participating under this Schedule, developers must submit a marketing review packet to PG&E containing all marketing materials the developer intends to use to market to any potential Regional Renewable Choice customers. These materials must align with the requirements of either Marketing Phase One Community Interest or Marketing Phase Two Customer Enrollment as provided in the Green-e Energy Developer Requirements. Green-e also participates in the review of the marketing materials as the bulk of the requirements stem from Green-e compliance. If PG&E and Green-e, in its reasonable discretion, determine that the marketing materials do not meet the criteria, the Regional Renewable Choice Applicant must update the materials and re-submit the documentation to PG&E. PG&E must grant final approval for Phase One Community Interest prior to offer submittal and before engaging in an initial 'community interest' phase. PG&E must also grant final approval for Phase Two Customer Enrollment prior to signing a Customer Developer Agreement (CDA) or other binding commitment with the customer. The CDA is not considered part of the Regional Renewable Choice Applicant's marketing materials and should not be included in the marketing package sent to PG&E for review.

**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
	Marin Energy Authority	Tiger Natural Gas, Inc.
Chevron Pipeline and Power	McKenzie & Associates	
City of Palo Alto		TransCanada
	Modesto Irrigation District	Troutman Sanders LLP
City of San Jose	Morgan Stanley	Utility Cost Management
Clean Power Research	NLine Energy, Inc.	Utility Power Solutions
Coast Economic Consulting	NRG Solar	Utility Specialists
Commercial Energy		
County of Tehama - Department of Public Works	Office of Ratepayer Advocates	Verizon
Crossborder Energy	OnGrid Solar	Water and Energy Consulting Wellhead Electric Company
Crown Road Energy, LLC	Pacific Gas and Electric Company	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP	Peninsula Clean Energy	Yep Energy
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		