

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE



March 24, 2020

**Advice Letter 4201-G/5729-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: Informational Only Submittal PG&E, SCE's and SoCalGas' Bulk  
Purchasing Plan for San Joaquin Disadvantaged Communities Pilots.**

Dear Mr. Jacobson:

Advice Letter 4201-G/5729-E is effective as of March 13, 2020

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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P.O. Box 770000  
San Francisco, CA 94177

Fax: 415-973-3582

December 30, 2019

**Advice 4201-G/5729-E**

(Pacific Gas and Electric Company ID U 39 M)

**Advice 4138-E**

(Southern California Edison Company ID U 338 E)

**Advice 5563-G**

(Southern California Gas Company ID U 904 G)

Public Utilities Commission of the State of California

**Subject: Information-Only Submittal - PG&E's, SCE's, and SoCalGas' Bulk Purchasing Plan for San Joaquin Disadvantaged Communities Pilots**

**Purpose**

Pursuant to Ordering Paragraphs (OPs) 15.f and 16 of California Public Utilities Commission (CPUC or Commission) Decision (D.) 18-12-015, issued on December 19, 2018, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE) and Southern California Gas Company (SoCalGas) (collectively, Joint IOUs) submit this Joint Tier 1 Information Only Advice Letter providing their Bulk Purchasing Plan for approved San Joaquin Valley Disadvantaged Communities (SJV DAC) Pilots, as shown in Attachment A.

**Background**

In 2015, the Commission initiated a rulemaking to (1) identify disadvantaged communities in the San Joaquin Valley, and (2) evaluate the feasibility of options to improve access to affordable energy in these communities.<sup>1</sup> To assist in addressing these goals, D.18-12-015 approved pilots in eleven (11) SJVDACs.

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<sup>1</sup> Order Instituting Rulemaking to Identify Disadvantaged Communities in the San Joaquin Valley and Provide Economically Feasible Options for Affordable Energy, R. 15-10-030, p. 2 (April 3, 2015).

D.18-12-015, OPs 15.f and 16, directed the Joint IOUs to submit a Joint Tier 1 Bulk Purchasing Information Only Advice Letter within 60 days after the approval of their Tier 2 Program Implementation Plan filings containing:

- a) Bulk purchasing pricing arrangements for approved pilot projects; and
- b) Co-funding arrangements providing for measures available through the Energy Savings Assistance Program, the Middle-Income Direct Install Program, the Mobile Home Direct Install Program and/or the California Solar Initiative Solar Thermal Program at the current measure and installation costs established in those programs.

### **Information-Only Bulk Purchasing Plan**

The Joint IOUs provide their Bulk Purchasing Plan for approved SJVDAC Pilots in Attachment A as information-only pursuant to OPs 15.f and 16 of D.18-12-015.

### **Protests**

This is an information-only advice letter submittal. Pursuant to General Order 96-B Section 6.2, Joint IOUs are not seeking relief through this advice letter and thus this advice letter is not subject to protest.

### **Effective Date**

Pursuant to OPs 15.f and 16 of D.18-12-015, the Joint IOUs request that this Tier 1 information-only advice letter become effective upon the date of submittal, which is December 30, 2019.

### **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 the parties shown on the attached list and the parties on the service list for R.15-03-010. 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/>.

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Erik Jacobson  
Director, Regulatory Relations

Attachments

cc: Service List R.15-03-010



# 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) #: 4201-G/5729-E

Tier Designation: Information Only

Subject of AL: Information-Only Submittal - PG&E's, SCE's, and SoCalGas' Bulk Purchasing Plan for San Joaquin Disadvantaged Communities Pilots

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.18-12-015

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: 12/30/19

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 proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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](mailto: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**  
**Bulk Purchasing Joint Tier 1 Information Only**  
**Advice Letter**

## Overview

The investor-owned utilities (IOU) collaborated on their respective appliance purchasing strategies and are generally aligned, with minor variations in approach. These strategies are below. Where there are notable differences among the IOUs, those differences are described for clarification. Richard Heath and Associates, Inc. (RHA), functioning as the third-party Pilot Administrator/Pilot Implementer (PA/PI), also participated in and contributed to the IOU discussions during development of this Advice Letter (AL).

Table 1 below provides an overview of the IOUs' approach to the appliance topics raised by the California Public Utilities Commission in Decision (D.) 18-12-015 related to bulk purchasing: measure pricing strategy,<sup>1</sup> co-funding (leveraged-funding)<sup>2</sup> arrangements,<sup>3</sup> uniformity of measure specifications,<sup>4</sup> and supply chain sufficiency.<sup>5</sup> The IOUs' strategies on each of these topics is dependent in part on whether the measures are (1) currently offered through an existing program; or (2) new and unique to the San Joaquin Valley Disadvantaged Communities Pilot (Pilot). As a result, the strategies outlined within this AL are distinguished between existing measure and new measures.

There are some cases where a new electric or natural gas appliance provided through the Pilot is already offered through an existing IOU program but only when replacing "like for like" fuel type (i.e., an inefficient *electric* water heater can only be replaced with an efficient *electric* water heater). Because the Pilot specifically targets propane and wood-burning appliances for replacement with electric or natural gas appliances (i.e., switching the fuel type), these appliance replacements would normally not be eligible through the existing programs. For the purposes of describing appliance strategies, appliance replacements falling within these scenarios shall be referred to as "existing measures" because the new appliance being offered through the Pilot is a measure offered in an existing program, which allows for alignment in pricing, purchasing strategy, and appliance specifications. Only new appliance types that are unique to the Pilot shall be considered "new measures."

Each appliance strategy topic identified in D.18-12-015 is addressed in more detail in the sections that follow Table 1 below.

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<sup>1</sup> D.18-12-015, Section 11.2, p. 104.

<sup>2</sup> *Leveraged-funding* in this context refers to leveraging existing program funding to pay for measures available through existing IOU programs. D.18-12-015 refers to this as "co-funding," but it is relabeled as "leveraged-funding" within this advice letter for clarity.

<sup>3</sup> D.18-12-015, Section 14.2, p. 112.

<sup>4</sup> D.18-12-015, Section 11.2, p. 104.

<sup>5</sup> D.18-12-015, Section 11.2, p. 105.

**Table 1: Overview of Appliance Strategies for IOUs and Third-Party Program Administrator/Implementer**

	EXISTING MEASURES	NEW MEASURES			
	Appliances, Weatherization, Energy Efficiency, and Repairs	Cooking Appliances	Clothes Dryer	Heat Pump Appliances <sup>(a)</sup>	Tankless Water Heater <sup>(b)</sup>
<b>Measure Pricing Strategy</b>	Pilot measure pricing will be aligned with ESA measure pricing (or lower) and ESA supplier purchasing channels will be extended to PIs.	Perform due diligence during contract negotiations such as contact with internal and external industry experts, conducting market research on specifications and pricing, securing pricing quotes from manufacturers and distributors, etc. <sup>(c)</sup>			
<b>Leveraged-Funding Arrangements</b>	Eligible measures offered through existing programs will be installed, reported, and funded through those programs.	These measures are unique to the Pilot; therefore, leveraged-funding opportunities are not available.			
<b>Uniform Specifications Across Pilots</b>	Where possible, specifications will be based upon the California Installation Standards Manual, which is applicable across all IOUs.	# of possible features and consumer preferences may lead to variability.	Pilots will seek alignment across specifications.		Unique to SoCalGas.
<b>Supply Chain Sufficiency</b>	Existing measures are available through existing supply chains. There is no indication of supply chain deficiencies.	Avoidance of niche products and technologies, as well as coordination amongst Pilots, should alleviate risk of deficiencies in supply chain and availability of qualified service providers.			

- (a) Within each IOU’s Energy Savings Assistance (ESA) Program there are differences in which heat pump measures are offered. Insofar as heat pump Heating, Ventilation and Air Conditioning (HVAC) systems and heat pump water heaters are currently offered in each IOU’s respective ESA Program, these appliances are considered “existing measures” within Table 1 above; insofar as they are not currently offered, they are considered “new measures.”
- (b) Tankless water heaters are a unique offering in the Southern California Gas Company (SoCalGas) Pilot.
- (c) The IOUs are currently in various stages of contracting with Pilot Implementers. Subsequently these activities related to pricing negotiations may likewise be at various stages from planned to in-progress to completed.

**Measure Pricing Strategy**

*Pricing: Existing Measures*

Most measures to be offered through the Pilot are currently available through the ESA Program. These include some weatherization, Energy Efficiency (EE), repair, and select appliance measures. In support of the ESA Program, each IOU has pre-negotiated discounted material and installation labor pricing for ESA contractors. Where the IOUs have a dedicated ESA materials supplier, the PA/PI and PIs will have access to those suppliers but will not be required to use them. However, all IOUs will require that the PA/PI and PIs must meet or exceed the minimum specifications of materials

provided through the ESA Program and meet or beat the material and installation cost rates as established in the ESA Program, regardless of which supplier the PA/PI and PIs utilize. While this approach does not necessarily establish a single supplier for bulk purchasing of appliances, it does provide the intended outcome of a bulk purchasing approach, which is discounted material pricing extended to the Pilot.

#### *Pricing: New Measures*

Several key Pilot measures are unique to the Pilot and are not offered through existing programs. This includes some of the new appliances that will be replacing propane and wood-burning appliances. Each IOU has completed or is currently conducting competitive solicitations for the PA/PI and PIs, through which pricing for new measures is also negotiated. In addition, each IOU has conducted, or will conduct, research into the reasonable pricing of appliances by contacting internal and external industry experts, securing quotes from manufacturers and distributors both within and outside of established supply chains, and researching publicly available pricing data. The combination of these data points allows for the IOUs to negotiate discounted pricing with the PA/PI and PIs for the appliances unique to the Pilot. As with existing measures, these appliances will be available for purchase by the PA/PI and PI vendors through the dedicated ESA materials suppliers where those supply chains exist, but they may also be purchased through the vendor's own supplier so long as they meet or beat pricing available through the ESA materials suppliers. Alternatively, the IOUs may set up new bulk purchasing agreements with the manufacturers or distributors of new appliances as appropriate.

#### **Leveraged-Funding Arrangements with Existing Programs**

##### *Leveraged-Funding: Existing Measures*

For existing IOU programs, the IOUs will leverage existing programs to fund existing measures that the Pilot participants qualify for. However, the installation contractor representing the existing programs may vary depending on whether the PI is a participating contractor in those programs or not. Due to the variation in technical competencies required to provide installations for some of the programs identified in D.18-12-015—specifically, California Solar Initiative (CSI) Solar Thermal, Self-Generation Incentive Program, and Single-Family Affordable Solar Homes and Disadvantaged Communities Single-Family Affordable Solar Homes Programs—it is not feasible for a single installation contractor to directly perform all installations under every potential existing program. This means that in some cases the PI will act as the installation contractor for both the Pilot and the existing program being leveraged. This scenario is expected to apply to the ESA Program, across all IOU and Pilot communities. The intention is to combine installation visits in such instances in order to minimize burden on participating customers. In other cases, the PI will only perform installations for the Pilot, and installations for other existing programs will need to be performed by a separate contractor. Leveraging these programs and their respective funding will still occur, but the installation may be separate.

When the PI is not the installation contractor for an existing program, there are multiple ways that the Pilots may engage and leverage the existing programs. At a minimum, the IOUs will collaborate with the Community Energy Navigators to educate potential Pilot participants on other available programs and assist with providing referrals. In other instances, the IOUs may pursue an enhanced

referral approach whereby the PIs confirm customer interest and assess potential home feasibility, and then provide a referral to a participating contractor in the applicable existing program(s). The participating contractor shall then contact the customer directly and any resulting completed projects will be reported through and funded by that respective program.

Regardless of who the installation contractor is under the existing programs, Pilot measure installations and existing program measure installations shall be reported as separate projects under the Pilot and the existing programs, respectively, following established procedures for each program. This helps to ensure that each respective program both funds and reports achievements for those measures installed under their respective programs.

The IOUs are actively making decisions on the continuation or discontinuation of current EE programs in order to improve the cost effectiveness of their respective EE portfolios. Subsequently, some of the programs that were initially envisioned to be leveraged by the Pilot may change. The IOUs intend to actively coordinate with new and continuing residential EE programs to ensure Pilot participants can leverage available services and offerings.

#### *Leveraged-Funding: New Measures*

New measures are by their very nature unique to the Pilot. Subsequently, leveraged-funding for these measures is not applicable.

### **Uniformity of Measures Specifications**

#### *Uniformity: Existing Measures*

The California Installation Standards Manual (CISM) is the installation manual used by the ESA Program across IOUs. As such, the CISM will be used as guidance for all Pilot measures contained therein. However, the product specifications for the Pilot may be adjusted to exceed CISM specifications and exceptions to the feasibility requirements may also be necessary. Whereas the CISM may deem a measure ineligible due to feasibility criteria, the Pilot may leverage remediation funding to make minor home repairs that resolve the feasibility issue and allow installation of the measure. It is important to note that these types of repairs are only applicable to Pilot appliance measures and not to ESA Program measures. This will potentially expand uptake of appliance measures that would otherwise be considered not feasible according to the CISM.

#### *Uniformity: New Measures*

The Pilot Administrators with electric appliance offerings (including RHA as PA/PI) have collaborated with each other, as well as with internal and external industry experts, to identify a core set of minimum appliance specifications focused primarily on energy efficiency and annual electricity consumption. SoCalGas has also collaborated with internal and external industry experts to identify a core set of minimum natural gas appliance specifications focused primarily on energy efficiency. Due to the number of potential features available for cooking appliances and the variation among customer preferences for those appliances, it is expected that there may be some variation in cooking appliance selection across Pilots.

Electrification pilot community members have expressed a desire to have an opportunity to provide input on the electric appliances to be offered through the Pilots. Pacific Gas and Electric Company

(PG&E) and Southern California Edison Company (SCE) jointly shared a community engagement plan with the Pilot Team in September 2019 whereby they would provide minimum specifications to the Pilot Team, and the Pilot Team would then solicit feedback from community members on high-priority features desired in the Pilot appliances. The Pilot Team would relay this information back to PG&E and SCE to help inform appliance selection. This plan is currently in progress as of the time of this AL. PG&E and SCE intend to consider timely community member feedback before making final appliance selections and to relay this feedback to the 3P PA/PI for their consideration as well. Timeline and budget cost-effectiveness constraints may limit the extent to which feedback can be incorporated into final appliance selections.

Exhibit 1 contains the list of tentative minimum EE appliance specifications for each of the major appliances to be offered by each IOU and RHA. These specifications were informed by the annual usage targets that were included in the Bill Protection ALs<sup>6</sup> and may be updated based on community member feedback, customer uptake, and/or other market or regulatory factors.

### **Supply Chain Sufficiency**

#### *Supply Chain: Existing Measures*

As the number of potential Pilot participants is minor in comparison to the volume of annual participants in the ESA Program, and because most Pilot measures are available through the ESA Program, the IOUs are confident in the capacity of the existing IOU and vendor supply chains to also provide for the volume required in the Pilot.

#### *Supply Chain: New Measures*

For measures unique to the Pilot, the IOUs have made efforts to avoid niche products and technologies without established supply and repair networks, or products which would otherwise impose new burdens upon participants, which may either limit market availability or deter customer uptake. Examples that may have triggered these negative effects include restricting cooking appliance options to induction technology only; limiting clothes dryers to heat pump technology only; or requiring heat pump HVAC systems that use non-conventional refrigerant.

In addition, PG&E, SCE, and RHA will share planned appliance selections and supply sources to confirm that suppliers are able to provide the combined volume required across Pilots.

### **Conclusion**

The IOUs appreciate the opportunity to share its collective approaches to appliance purchasing and appliance selection. This AL outlines the joint IOUs planned strategies for measure purchasing and pricing, leveraged-funding arrangements, uniformity of measure specifications, and supply chain sufficiency. By taking these approaches the IOUs expect to achieve multiple benefits for Pilot participants and for the success of the Pilot overall. This includes maximizing available program offerings and funding sources for participants, leveraging existing discounted pricing and supply chains,

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<sup>6</sup> PG&E's March 18, 2019 Proposed Bill Protection Approach to Implement in Phase 2 of the San Joaquin Valley Disadvantaged Communities Pilot Proceeding – Advice 5496-E; SCE's 3970-E; SoCalGas' 5439-G.

ensuring consistent quality across Pilots, and providing the IOUs with sufficient flexibility to adapt in order to ensure the success of the Pilot.

Exhibit 1: Minimum Energy Efficiency Specifications for Pilot Appliances

*Electrification Pilot Appliances*

Appliance	Technology	PG&E	RHA	SCE
<b>Electric Range</b>	Ceramic	Energy efficiency standards are not available for this appliance		
<b>Electric Cooktop</b>	Ceramic	Energy efficiency standards are not available for this appliance		
<b>Electric Range</b>	Induction	Energy efficiency standards are not available for this appliance		
<b>Electric Cooktop</b>	Induction	Energy efficiency standards are not available for this appliance		
<b>Electric Wall Oven</b>	Conventional	Energy efficiency standards are not available for this appliance		
<b>Electric Clothes Dryer</b>	Conventional	<ul style="list-style-type: none"> <li>- Energy Star qualified</li> <li>- Compliance with the Combined Energy Factor (CEF) of a Ventless or Vented Electric, Standard size (4.4 cu. ft. or greater capacity)</li> <li>- Combined Energy Factor <math>\geq 3.93</math></li> </ul>	<ul style="list-style-type: none"> <li>- Energy Star qualified</li> <li>- Compliance with the Combined Energy Factor (CEF) of a Ventless or Vented Electric, Standard size (4.4 cu. ft. or greater capacity)</li> <li>- Combined Energy Factor <math>\geq 3.93</math></li> </ul>	<ul style="list-style-type: none"> <li>- Energy Star qualified</li> <li>- Ventless or Vented Electric, Standard size (4.4 cu. ft. or greater capacity)</li> <li>- Combined Energy Factor <math>\geq 3.93</math></li> </ul>
<b>Heat Pump Water Heater</b>	Heat Pump	<ul style="list-style-type: none"> <li>- Energy Star Qualified</li> <li>- Compliance with NEEA Advanced Water Heater Specification</li> <li>- UL-listed or equivalent</li> <li>- Compliance with UL 174 and UL 1995</li> </ul>	<ul style="list-style-type: none"> <li>- Energy Star Qualified</li> <li>- Compliance with NEEA Advanced Water Heater Specification</li> <li>- UL-listed or equivalent</li> <li>- Compliance with UL 174 and UL 1995</li> <li>- Wi-Fi Enabled</li> </ul>	<ul style="list-style-type: none"> <li>- Energy Star Qualified</li> <li>- Compliance with NEEA Advanced Water Heater Specification</li> <li>- 50 gallons or greater capacity</li> <li>- Energy Factor <math>\geq 2.6</math></li> </ul>
<b>Central Split System Heat Pump HVAC</b>	Heat Pump	<ul style="list-style-type: none"> <li>- Compliance with AHRI Central Split System specifications and Consortium of Energy Efficiency (CEE) Tier 3: 15 <math>\geq</math> SEER; 12 <math>\geq</math> EER; 8.5 <math>\geq</math> HSPF</li> <li>- UL Listed or equivalent</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with AHRI Central Split System specifications and Consortium of Energy Efficiency (CEE) Tier 3: 15 <math>\geq</math> SEER; 12.5 <math>\geq</math> EER; 8.5 <math>\geq</math> HSPF</li> <li>- UL Listed or equivalent</li> </ul>	<ul style="list-style-type: none"> <li>- Title 24 efficiency standards</li> <li>- Energy Star Qualified or Air-Conditioning, Heating, &amp; Refrigeration Institute (AHRI) certified</li> <li>- <math>\geq 15</math> SEER / <math>\geq 12</math> EER / <math>\geq 8.5</math> HSPF</li> </ul>
<b>Central Packaged System Heat Pump HVAC</b>	Heat Pump	<ul style="list-style-type: none"> <li>- Compliance with AHRI Central Split System specifications and Consortium of Energy Efficiency (CEE) Tier 3: 15 <math>\geq</math> SEER; 12 <math>\geq</math> EER; 8.5 <math>\geq</math> HSPF</li> <li>- UL listed or equivalent</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with AHRI Central Split System specifications and Consortium of Energy Efficiency (CEE) Tier 3: 15 <math>\geq</math> SEER; 12 <math>\geq</math> EER; 8.2 <math>\geq</math> HSPF</li> <li>- UL listed or equivalent</li> </ul>	Not offered through SCE
<b>Mini Split Ductless Heat Pump HVAC</b>	Heat Pump	<ul style="list-style-type: none"> <li>- Compliance with AHRI Min Split Ductless System specifications and Consortium of Energy Efficiency (CEE) Tier 3: 15 <math>\geq</math> SEER; 12 <math>\geq</math> EER; 8.5 <math>\geq</math> HSPF</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with AHRI Min Split Ductless System specifications and Consortium of Energy Efficiency (CEE) Tier 3: 15 <math>\geq</math> SEER; 12.5 <math>\geq</math> EER; 8.5 <math>\geq</math> HSPF</li> </ul>	<ul style="list-style-type: none"> <li>- Title 24 efficiency standards</li> <li>- Energy Star Qualified or Air-Conditioning, Heating, &amp; Refrigeration Institute (AHRI) certified</li> </ul>

*Natural Gas Pilot Appliances*

Appliance	SoCalGas
Natural Gas Range	- N/A
Natural Gas Cooktop	- N/A
Natural Gas Wall Oven	- N/A
Natural Gas Clothes Dryer	Energy Star qualified Combined Energy Factor $\geq$ 3.49 $\geq$ 6.5 cu. ft.
Natural Gas Storage Water Heater	Energy Star Qualified $\geq$ 67% Annual Fuel Utilization Efficiency $\geq$ 30 Gallon Storage Tank
Natural Gas Tankless Water Heater	Energy Star Qualified $\geq$ 90% Annual Fuel Utilization Efficiency
Natural Gas Wall Furnace	$\geq$ 65% Annual Fuel Utilization Efficiency
Natural Gas Forced Air Unit Furnace	Energy Star Qualified $\geq$ 95% Annual Fuel Utilization Efficiency

**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		