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February 6, 2020

Advice 4212-G/5756-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Statewide ESA Policy and Procedures Manual Waiver for Contractor to Distribute CARB Batteries to Qualifying ESA Customers

Purpose

The purpose of this Tier 1 advice letter is to inform the Commission about clean battery storage units that will be provided to qualifying Energy Savings Assistance (ESA) customers at no cost to either the ESA customers or the ESA Program.

Background

In Quarter 4, 2019, the California Air Resources Board (CARB) approached PG&E about an ESA leveraging opportunity. CARB is leveling a penalty on a manufacturer that shipped diesel generators into CA. This manufacturer, as their fine, must now ship into California \$1.8M worth of clean battery storage units earmarked for vulnerable customers. CARB contacted PG&E to ask if this manufacturer could leverage the ESA Program to provide these units to PG&E vulnerable low income customers at low overhead costs. No costs would be borne by the ESA Program.

PG&E's ESA service provider has agreed to distribute and install these batteries to eligible ESA customers at a low overhead cost, allowing maximum funding to be directed at providing more clean battery storage units to customers.

Battery storage unit installation would occur while the ESA implementers are already in customer homes doing measure assessments for the customer's ESA participation. This battery installation work will be completed at no cost to the ESA Program, and PG&E ESA Program Managers will not manage this work. In the event there are claims of any kind against PG&E related to battery storage unit work performed by the ESA Service Provider for the battery storage units themselves, the Service Provider will indemnify, defend, and hold PGE harmless pursuant to the terms of this agreement.

To leverage installation of these CARB penalty battery storage units, PG&E is providing a limited waiver to its Service Provider overriding the Statewide ESA Policy & Procedures Manual (P&P Manual) prohibitions against performing and billing non-ESA work while providing ESA. The P&P Manual's Section 3.3.3 on "Other Work" reads:

3.3.3 Other Work

Only work directly associated with providing ESA Program authorized services to participating customers may be billed to the ESA Program. The Service Provider is prohibited from selling other services to the customer or charging the customer for any other service.²⁴

²⁴ This provision does not preclude the possibility of requiring a co-payment for the installation of one or more measures, if approved by the utility.

(Statewide ESA 2017-2020 Cycle P&P Manual, Final, revised October 2019, p.26)

On January 22, 2020, PG&E discussed this P&P Manual restriction against performing and billing non-ESA work with Energy Division (ED) staff. PG&E discussed whether it needed to provide a contract waiver to its Service Provider enabling them to perform this non-ESA service. ED agreed with PG&E's assessment that providing the CARB penalty battery storage units at no cost to the customer or the ESA Program does not conflict with P&P Manual Section 3.3.3. PG&E agreed to file a Tier 1 Advice Letter.

PG&E includes a contract waiver allowing its Service Provider to provide the ARB penalty battery storage units while performing ESA in-home assessments since the P&P Manual's Section 3.3.3 prohibits selling additional services to customers or billing them to the ESA Program, and the battery storage units are being provided at no cost to either the customer or the ESA Program. The original intent of this prohibition against performing other (non-ESA) work was to prevent contractors from selling additional services to "captive" low income customers while they were in their homes for the ESA Program. However the leveraging opportunity described herein would not be billed to the ESA Program, and does not involve selling additional services to customers who will receive the batteries at no cost.

PG&E is pleased to help support this effort since it provides emergency preparedness benefits at no cost to vulnerable customers impacted by extended power outage interruptions. Low income customers provided battery storage units will experience

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than February 26, 2020, which is 20 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

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

Pursuant to General Order (GO) 96-B, Rule 5.1, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is February 6, 2020.

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.19-11-003, A.19-11-004, A.19-11-005, A.19-11-006, and A.19-11-



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) #: 4212-G/5756-E

Tier Designation: 1

Subject of AL: Statewide ESA Policy and Procedures Manual Waiver for Contractor to Distribute CARB Batteries to Qualifying ESA Customers

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 #:

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: 2/6/20

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	IGS Energy	San Francisco Water Power and Sewer
California Energy Commission	International Power Technology	Seattle City Light
California Public Utilities Commission	Intestate Gas Services, Inc.	Sempra Utilities
California State Association of Counties	Kelly Group	Southern California Edison Company
Calpine	Ken Bohn Consulting	Southern California Gas Company
	Keyes & Fox LLP	Spark Energy
Cameron-Daniel, P.C.	Leviton Manufacturing Co., Inc. Linde	Sun Light & Power
Casner, Steve	Los Angeles County Integrated	Sunshine Design
Cenergy Power	Waste Management Task Force	Tecogen, Inc.
Center for Biological Diversity	Los Angeles Dept of Water & Power	TerraVerde Renewable Partners
	MRW & Associates	Tiger Natural Gas, Inc.
Chevron Pipeline and Power	Manatt Phelps Phillips	
City of Palo Alto	Marin Energy Authority	TransCanada
	McKenzie & Associates	Troutman Sanders LLP
City of San Jose	Modesto Irrigation District	Utility Cost Management
Clean Power Research	Morgan Stanley	Utility Power Solutions
Coast Economic Consulting	NLine Energy, Inc.	Utility Specialists
Commercial Energy	NRG Solar	
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		