PUBLIC UTILITIES COMMISSION 505 Van Ness Avenue San Francisco CA 94102-3298



Pacific Gas & Electric Company GAS (Corp ID 39) Status of Advice Letter 4219G/5765E As of August 19, 2020

Subject: Self-Generation Incentive Plan (SGIP) Residential Equity Resiliency Marketing Plan and

Implementation Strategy

Division Assigned: Energy

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PUBLIC UTILITIES COMMISSION 505 Van Ness Avenue San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

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The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

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Energy Division's Tariff Unit by e-mail to edtariffunit@cpuc.ca.gov



Erik JacobsonDirector
Regulatory Relations

Pacific Gas and Electric Company 77 Beale St., Mail Code B13U P.O. Box 770000 San Francisco, CA 94177

Fax: 415-973-3582

February 20, 2020

Advice 4219-G/5765-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Self-Generation Incentive Plan (SGIP) Residential Equity Resiliency

Marketing Plan and Implementation Strategy

<u>Purpose</u>

The purpose of this letter is to provide a marketing plan and implementation strategy for the Marketing Education and Outreach plan.

Background

On Tuesday, January 14th, PAs conducted a Marketing Education and Outreach (ME&O) workshop with key stakeholders to discuss the preliminary Self-Generation Incentive Plan (SGIP) Residential Equity Resiliency Marketing Plan and requested feedback to incorporate into the comprehensive plan. There was extensive discussion and input provided from various stakeholders that has informed the following comprehensive plan. In addition, PAs are continuing to have follow up discussions with stakeholders to listen to recommendations on what will enhance program success. To capitalize on timing available, the following representatives have been engaged post workshop to incorporate additional feedback into the plan before submittal:

- East Bay Community Energy
- Medical Disability Rights Advocacy Group
- Rebuild NorthBay
- Rebuild Paradise

Workshop feedback, PA response and recommendations (provided in Appendix A of this document) include the following overarching categories:

- working with Community-Based Organizations (CBOs) as a primary channel for communication
- removal of barriers to adoption
- integration opportunities with key partner programs

 key messages to educate customers with medical disabilities helping to guide them through the process to program adoption.

In addition to the Marketing workshop, a decision was issued on January 16th, that expands the eligible customer size for the program to include customers who have experienced 2+ Public Safety Power Shutoff (PSPS) events. The target audience focus remains with the equity resiliency customer.

Lastly, as outlined in the preliminary plan filed, the following is inclusive of the outreach to non-residential audience segment with focus on critical infrastructure in high impact wildfire/PSPS regions of the service area.

Although this is considered a comprehensive plan, it is not considered final. PG&E is taking a learn-in-market approach for speed to market and will be flexible based on performance. PG&E is planning on being iterative to marketing education and outreach planning/execution.

Marketing Plan

A. Marketing Objectives:

- Drive SGIP program enrollments focusing on the equity resiliency customer.
- Educate on the benefits, limitations and considerations of battery storage.

B. Target Market:

- Primary Residential: Customers on Medical Baseline rate or have notified PG&E of a serious illness or condition that could be life-threatening if electricity is disconnected and have experienced 2+ PSPS shut off events. Estimated audience size for PG&E's service territory = ~27,100
- Secondary Residential: Eligible Medical Baseline customers that have already adopted rooftop solar but not batteries. Estimated audience size for PG&E's service territory = ~2,500
- *Non-Residential:* Local Government and state agencies, education institutions, non-profits and small businesses in Disadvantaged or low-income communities as defined in Decision 20-01-021.

C. Outreach and Messaging Strategy:

Positioning:

 Storage makes your home or business more flexible to your energy needs, extending power during outages and PSPS events. You may be eligible for incentives to help cover the costs.

Barriers to Adoption:

- 1. Upfront costs:
- PG&E acknowledges funding upfront battery costs presents a challenge to residential equity resiliency customers. To help ease this barrier, PG&E plans to seek approval from the CPUC for financial assistance to mitigate upfront costs for critical resiliency customers. For residential customers, PG&E is proposing an assistance program that shall be equally shared between the storage contactor and PG&E. The proposal will be to offer 50% of the eligible incentive as an advance incentive payment to the contractor in exchange for no upfront cost to the customer. The remaining 50% of the incentive will be paid upon completion.
- For the non-residential segment, PG&E is requesting to make the on-bill financing program available to enable eligible equity resiliency customers the option to finance their system with 0% interest.
- In addition, PAs see opportunity to integrate SGIP messaging within relevant upcoming CCA resiliency programs. Within these CCA programs, there are preselected installers and financing options to cover the upfront costs.
- 2. Trust in program legitimacy:
- To increase the trust in program legitimacy, PG&E plans to offer program
 information and resources within owned channels (i.e. email, website, print
 collateral with PA logo displayed, and PSPS/Wildfire education efforts.) Further,
 PG&E acknowledges the importance of in-person communication and plan to tap
 into trusted affinity groups and available CBO networks including an enrollment
 fee for CBOs (as recommended within the workshop.)

In addition, outreach channels will include community partners detailed in the integration partner section of this presentation. PG&E is continuing stakeholder discussions and actively seeking to add relevant partner recommendations to the CBO effort. Key stakeholder outreach will be beneficial in the initial program education phase of the customer journey. This combination of touches will help validate the program. Use of affinity group outreach will also ensure program education will reach customers in more rural geographies that may have limited access to internet.

3. Case Managers:

 PG&E understands navigating the challenging and complicated adoption process. With the focus on CBO/trusted affinity group outreach, the intent is to have a point person that can help customers through the process to enhance program success.

- 4. Installer inventory and rural geography focus:
- To alleviate concerns of available inventory statewide as well as attention geographically hard to reach communities, PG&E plans to maintain ongoing communication with installers, including invitations and access to planned community events (i.e. PSPS town halls.) Doing so should help prevent inventory issues and encourages rural community inclusion.

Outreach Strategy:

- Channel: Use trusted local voices to educate customers (i.e. affinity groups, CBOs) and IOU/PA Non-Residential Relationship Managers as a primary outreach channel to reach hard to reach customers and tap in to existing relationships.
- Stakeholder program integration: Continue to engage partners and collaborate on embedding SGIP within relevant programs and messages.
- Key Messages: Highlight benefits of increased power during a PSPS as well as removing adoption barriers offering clarity and solutions to issues including: financing upfront fees, navigating the process, tax implications to healthcare status, immigration status impacts, and language preference.

Customer Journey

- 1. Educate
 - What is battery storage?
 - Benefits/Limitations
 - Reliability
 - Equipment lifespan/maintenance
 - If solar is needed

2. Explore

- Affordability
- Eligibility for SGIP
- Determine financing options (exploring financial assistance program to cover upfront costs)
- Impacts to immigration/tax status if incentive is received
- Equipment warranty
- Select a Contractor Resources/Roles and Responsibilities
- Describing the process

3. Install

- How battery works with medical equipment
- How and when you apply for the rebate
- When you receive the incentive money back
- How to turn on the system

4. Interconnect

- How long before can start using
- Knowing when approved to turn on

5. Use

- Who to call if it doesn't work
- Knowing when to charge/discharge

D. Outreach Channels and Tactics:

PG&Es will use a test and learn approach within the recommended tactics below to educate and drive adoption.

Residential Tactics:

 CBO/Affinity Group outreach: Use a collection of affinity groups as the primary outreach channel, to engage the equity resiliency customer. CBOs offer opportunity for in-depth conversations to effectively educate customers and guide them through a complicated process. CBO focus will help address key concerns of trust in program authenticity and add a knowledgeable point person to help achieve program success.

PG&E plans to tap into their existing CBO network as well as expand it to additional relevant organizations provided via key stakeholders. Support key stakeholders (e.g. CCAs, low income solar PAs) with program content for their CBO network, as relevant. In addition, to receive CBO resources, PG&E plans to offer an enrollment fee (capitation) as an incentive. Within PG&E's service area, outreach consists of:

- Partnering with 38 community outreach contractors (already treating low income homes to be more energy efficient and identifying potential/existing medical baseline customers) and 39 CBOs (i.e. Faith-based organizations, Independent Living Centers) throughout the service area that currently support PG&E's Access and Functional Needs customers, California Alternative Rates Energy (CARE), and other low-income programs. PG&E will provide educational program information to community outreach contractors and CBOs that can be shared with customers as their energy options are discussed. The CBOs offer services as a total network, supporting multiple languages.
- 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 SGIP program with the Latino population at events and service offices as they

conduct CARE outreach at service locations.^[1] The Community Health Outreach Worker project focuses on in-language and cultural relevant outreach and enrollment activities.

- In addition to CBO counts above, PG&E plans to engage over 200 organizations focused on Access and Functional needs customers, Voluntary Organizations Active in Disaster and American Disabilities Act (ADA.) A sample of the organizations to be included in our program education include:
 - o California Foundation of Independent Living Centers
 - Meals on Wheels
 - CA ADA Coordinators Network
 - Enterprise Accessibility
 - Strategic Implementations and Disability Advocate
 - American Red Cross
 - Butte County Community Action Center
- Message integration: Low-Income Solar (SASH, DAC-SASH and SOMAH)
 programs, relevant CCA resiliency programs and PSPS Education Campaign
 (PG&E service area offering 45+ PSPS open house events, notifications, and
 website communications in 2020) provides opportunities to promote SGIP in a
 contextually relevant way and cost-effectively. In addition, PG&E will explore
 incorporating messaging within relevant county/local/tribal government materials.
 This could include the following:
 - One-on-one or group meetings
 - Informational webinars
 - Workshops and exercises with agency stakeholders
 - o Collateral materials to share, including facts sheets/flyers/brochures
- Program toolkit: Develop materials to be used for partner outreach as well as key stakeholder message integration opportunities. Materials to include an insert/collateral, fact sheet, and social media messaging.
- *Direct Mail/Email:* Highly targeted tactic providing flexibility to educate customers.
- *Telephone outreach:* High touch direct channel that can follow a direct mail/email effort to have a more productive conversation.

^[1] Quantity of program offices to be determined.

- Local Media: Consider development of a news release and target specific media outlets where our targeted customers reside.
- Social Media: Explore opportunities to target within social channels (i.e. Nextdoor and local Twitter handles) through both paid and organic posts.
- Targeted Print: Consider local news publications as another education method, depending on if/how much press is picked up from earned media effort.
- *Installer Education*: Marketing education will be included within the installer education webinars PAs will conduct with regularity.

Non-Residential Tactics:

- Business Energy Solutions Relationship Managers: PG&E plans to offer educational materials to relationship managers that can advise their customers on the benefits of SGIP.
- Message Integration: Working with key stakeholders discussed in residential section to educate eligible businesses on SGIP.
- Program Toolkit: Develop materials for this audience segment to be used by Business Energy Solutions and within Message Integration opportunities.
 Materials to include a fact sheet, presentation, and social media messaging.
- *Installer Education*: Marketing education will be included within the installer education webinars PAs will conduct with regularity.

1. Metrics and Timeline:

Criteria for tracking and measuring success as shown below.

Marketing Tactic	In Market Timing	Marketing Key Performance Indicator
Internal and 3 rd Party Stakeholder Message Integration	April/May	N/A
CBO/Affinity Groups	Ongoing starting May	Number of Conversations, Leads generated
Direct Mail/Email	May-June	Open rate, Click rate, Website visits, enrollments
Telemarketing	June-August	Number of Conversations, Leads generated, enrollments
Local Media	April/May	Number of press hits
Paid Social	April	Impressions, Clicks
Targeted Print	June	Impressions, website visits

Timing considerations: On average, it takes 3 months starting with the initial installer visit to complete installation. Outreach in-market timing is contingent upon timely approval of this ME&O plan.

2. Marketing Budget:

Tactic	Budget (PG&E)
Program Toolkit and	\$100,000
Collateral	
CBO enrollment fee	\$150,000
Direct Mail/Email	\$125,000
Telemarketing	\$30,000
Paid Social	\$10,000
Targeted Print	\$50,000
PG&E Marketing	\$150,000
Labor	
Total	\$615,000

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 11, 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

PG&E requests that this Tier 2 advice submittal become effective on regular notice, March 21, 2020 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 R-12-11-005. 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

Appendix

cc: Service List - R-12-11-005

APPENDIX A

On Tuesday, January 14th, the SGIP Marketing Education and Outreach Workshop was held. PAs presented preliminary plan content requesting stakeholder feedback. Below are key topics discussed, followed by a separate section that provides responses and recommendations to those key topics.

Key Discussion topics were included with the following stakeholder feedback:

- Additions to the customer journey:
 - Adding in basic battery storage education to front of journey
 - Including questions about eligibility, authenticity of the incentive, and implications to immigration/tax status
 - Detailing the steps for applying for and receiving the incentive
 - Understanding the roles and responsibilities of all involved in the process
- Determining customer eligibility
 - Developing an IT solution for contractors and potential customers to type in information to confirm eligibility
- Removing barriers to adoption
 - SGIP requires customers to fund the upfront costs of the battery. Incentive to reimburse is received after system approval
 - Trust that the incentive is legitimate and/or trust in who is providing the message
 - Navigating a complicated process and time to dedicate. Stakeholders felt an assigned case manager is necessary to help customers from beginning to end.
 - Limited access to internet/attention from installers due to rural geography
 - o Battery Inventory. Ensuring installers have capacity to meet demand.
 - Timing to install before Wildfire Season
- Target audience
 - Concern solar was not a focus of the target
 - Concern CARE was being used as an indicator within targeting
 - Disagreement preference for digital communications based on having a valid email address
- Outreach channels
 - Majority of channel focus should be on CBO outreach
 - Use of trusted affinity groups (i.e. independent living groups)
- Key Messages
 - o Differentiate messages for renters vs. homeowners
 - Separating educational and acquisition messaging
 - Recommend materials be offered in multiple languages

- Providing resources where medical manufacturer equipment information can be found
- Highlighting the environmental impact based on adoption/use of battery
- Stakeholder/Partner Integration
 - EBCA shared a series of Distributed Energy Resource programs (DER) currently in RFP that pre-selects installers and helps low income customers adopt solar + storage. There is a good integration opportunity within these programs
 - Electricity=Life offered an additional disability rights advocate group CHANGES that has been successful reaching low income customers. In addition, recommended ongoing conversations to ensure reaching customers effectively.
 - Rebuild NorthBay offered to integrate SGIP into their communications that is committed to rebuilding efforts within Napa, Sonoma, Lake and Mendocino counties

Responses and Recommendations:

Following the Marketing Workshop, the PAs have reviewed stakeholder feedback and had follow up discussions with various groups representative from the workshop to address stakeholder feedback. Below you will find the PA plans to address workshop comments.

Revised Customer Journey (as stated in Section D of the ME&O plan.)

- 1. Educate (added upfront step):
 - Describing what is battery storage
 - Benefits/Limitations
 - Reliability
 - Equipment lifespan
 - If solar is needed

2. Explore

- Affordability
- Eligibility for SGIP
- Determine financing options (exploring financial assistance program to cover upfront costs)
- Impacts to immigration/tax status if incentive is received
- Equipment warranty
- Select a Contractor Resources/Roles and Responsibilities
- Describing the process

3. Install

- a. How battery works with medical equipment
- b. How and when you apply for the rebate
- c. When you receive the incentive money back
- d. How to turn on the system

4. Interconnect

- a. How long before can start using
- b. Knowing when approved to turn on

5. Use

- Who to call if it doesn't work
- Knowing when to charge/discharge

SGIP Steps:

- 1. Learn about program/determine eligibility (Utility/Partner/CBO outreach)
- 2. Select a contractor
- 3. Contractor/CBO completes SGIP application and awaits approval
- 4. Customer financial assistance provided to cover upfront costs, if applicable.
- 5. Contractor Installs Equipment
- 6. Approved SGIP funds provided by utility to the entity designated as the
- 7. Contractor provides incentive amount to customer, if applicable
- 8. Customer applies rebate amount to financing to finalize upfront cost coverage, if applicable

Customer Eligibility tool:

PAs can help pre-determine customer eligibility using available customer data. Although PAs agree an IT solution to enable customers and partners to determine eligibility would be of value, it's not feasible within the timeframe allowed to increase customer adoption to impact the 2020 Wildfire season. PAs recognize how this could constrain growing adoption and feel greater emphasis on targeted outreach to eligible customers is going to be key to program adoption success. With recent decision to expand eligibility to customers with 2+ PSPS events called, there should be an easier path to determining eligibility as well. In addition, PAs will investigate the potential of verifying eligible customer information to key stakeholder groups (i.e. Disability Right Advocates) to aid in adoption.

Remove Barriers to Adoption: (as provided in section D of ME&O plan)

Upfront costs:

PAs acknowledge funding upfront battery costs presents a challenge to equity resiliency customers. To help ease this barrier, PAs are investigating updates to financial assistance offerings to cover these customers. In addition, PAs see opportunity to integrate SGIP messaging within relevant upcoming CCA programs community resilience initiatives. Within these CCA programs, there are pre-selected installers and financing options to cover the upfront costs.

Trust in program legitimacy:

To increase the trust in program legitimacy, PAs plan to offer program information and resources within PA owned channels (i.e. email, website, print collateral with PA logo displayed, and PSPS/Wildfire education efforts.) Further, PAs acknowledge the importance of in-person communication and plan to tap into available CBO networks and include a referral fee (as recommended within the workshop.)

In addition, outreach channels will include Community partners detailed in the integration partner section of this presentation. In addition, PAs are continuing stakeholder discussions and actively seeking to add relevant partner recommendations to the CBO effort. Key stakeholder outreach will be highly effective in the initial program education phase of the customer journey. This combination of solutions will help validate the program. Use of on-the-ground outreach will also ensure program education will reach customers in more rural geographies that may have limited access to internet.

Case Managers:

PAs understand the challenges of navigating the complicated adoption process. With the focus on CBO outreach, the intent is to have a point person for each major customer segment (Medical Baseline and Equity) that can help customers through the process to enhance program success.

Installer inventory and rural geography focus:

To alleviate concerns of available inventory statewide as well as attention within rural communities, PAs plan to maintain ongoing communication within the installer community (as outlined in the program portion of the Advice Letter.) Included in ongoing communication will be invitation and access to planned community events (i.e. PSPS monthly town halls.) Doing so should help prevent inventory issues and encourages rural community inclusion.

Target Audience:

PAs recognize rooftop solar adds value to SGIP adoption and fully intends to include solar education messaging within outreach as well as collaborate with stakeholder to incorporate solar outreach with relevant SGIP messaging. Further, segmenting SGIP eligible customers that already have rooftop solar is to receive applicable messaging. However, PAs are also taking the decision's direction to expand outreach scope to not just focus on homeowners for customers that have a higher barrier to adopting rooftop solar. In addition, the disability rights advocates have expressed concerns of adding a barrier to adoption by focusing on having both solar and battery storage adopted. Adhering to the goal of gaining SGIP adoption as quickly as possible to impact wildfire season, and offer fair and equal territory coverage, PAs are choosing to incorporate rooftop solar in targeting but are not solely focusing on rooftop solar + battery storage.

PAs will consider CARE enrollment as an indicator to eligibility for SGIP among non-Medical Baseline customers. The primary target is eligible Medical Baseline Customers where CARE enrollment will be used as an indicator of customer financial situation.

Lastly, to address stakeholder concerns over customer preference to digital communications by having a valid email address, PAs plan a layered channel approach with CBO outreach being the primary channel. If a valid email address is available, customers may receive an email on the program but that is not planned to be the only method of communicating the program. As previously stated, PAs agree opportunity for deeper conversations is necessary and have those included in the channels (i.e. CBO outreach) section of this plan.

Outreach Channels:

PAs agree CBO outreach and partner integration is an important part of the overall channel mix. For example, PG&E has an established CBO infrastructure to support the low-income audience supporting enrollments for both the CARE and ESA programs. In addition, this network has visibility in related programs that can coordinate efforts and avoid overlap, to be effective and impactful to the territory. For example, recently the Clean Air Resource Board (CARB) has initiated a non-utility \$1,800,000 pilot in PG&E service territory to gain solar powered battery adoption to low income customers.

Key Messages:

PAs plan to account for customer types that are renters vs. homeowners within messaging. Examples of ways this could be accomplished are highlighting SGIP is available to eligible customers that are renters and including rooftop solar as a support message available to homeowners.

To address concerns in separation of education and acquisition messaging, PAs feel there is opportunity to integrate both within a given communication. To avoid a lengthy and potentially confusing communication, there are multiple communications planned to work together to achieve success. One communication may primarily focus on education with a mention of the SGIP incentive, while another could focus more on acquisition, secondarily reiterating basics of battery storage. The most compelling message that should be inclusive in all communications is the benefit of extending customer's power needs with money to help cover costs. PAs recommend keeping SGIP acquisition messaging consistent throughout communications to achieve results. But weighting of education vs. acquisition messaging may vary to help customers through to adoption.

As stated in mid-December filing, PAs plan to take language preference into account and provide outreach materials in language as necessary by territory. In addition, PAs agree providing resources for questions on medical equipment is a valuable message and welcome relevant resources within outreach.

PAs agree GHG is an important message overall but don't agree it is a key message for the current program focus (PSPS/Wildfire solution to vulnerable audience.) PAs plan to include GHG Information as a support message as relevant (i.e. website page.)

Stakeholder/Partner integration:

As stated in above sections, PAs are open to integration, have taken workshop follow up steps to achieve and plan to continue dialog with partners as the program proceeds.





California Public Utilities Commission

ADVICE LETTER



LINERGI UIILIII	CAU		
MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)			
Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39M)			
Utility type: LEC LEGAS 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 WATER = Water	(Date Submitted / Received Stamp by CPUC)		
Advice Letter (AL) #: 4219-G/5765-E	Tier Designation: 2		
Subject of AL: Self-Generation Incentive Plan (SGIP) Residential Equity Resiliency Marketing Plan and Implementation Strategy			
Keywords (choose from CPUC listing): Compliance, Self Generation 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: $_{ m No}$			
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	No. of toyiff shoots a		
Requested effective date: 3/21/20 Estimated system annual revenue effect (%): N	No. of tariff sheets: $_{ m 0}$		
Estimated system average rate effect (%): $ m 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: $_{ m N/A}$			
Service affected and changes proposed $^{ ext{l:}}$ $_{ ext{N/A}}$			
Pending advice letters that revise the same tariff sheets: $_{ m N/A}$			

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

Albion Power Company Alcantar & Kahl LLP

Alta Power Group, LLC Anderson & Poole

Atlas ReFuel BART

Barkovich & Yap, Inc. P.C. CalCom Solar

California Cotton Ginners & Growers Assn California Energy Commission California Public Utilities Commission California State Association of Counties

Calpine

Cameron-Daniel, P.C. Casner, Steve Cenergy Power

Center for Biological Diversity

Chevron Pipeline and Power

City of Palo Alto

City of San Jose Clean Power Research Coast Economic Consulting Commercial Energy

County of Tehama - Department of Public

Works

Crossborder Energy Crown Road Energy, LLC Davis Wright Tremaine LLP Day Carter Murphy

Dept of General Services Don Pickett & Associates, Inc.

Douglass & Liddell

Downey & Brand

East Bay Community Energy Ellison Schneider & Harris LLP Energy Management Service

Engineers and Scientists of California

Evaluation + Strategy for Social

Innovation

GenOn Energy, Inc.

Goodin, MacBride, Squeri, Schlotz &

Ritchie

Green Charge Networks Green Power Institute Hanna & Morton

ICF

IGS Energy

International Power Technology Intestate Gas Services, Inc.

Kelly Group Ken Bohn Co

Ken Bohn Consulting Keyes & Fox LLP

Leviton Manufacturing Co., Inc. Linde Los Angeles County Integrated Waste Management Task Force Los Angeles Dept of Water & Power

MRW & Associates Manatt Phelps Phillips Marin Energy Authority McKenzie & Associates

Modesto Irrigation District

Morgan Stanley NLine Energy, Inc. NRG Solar

Office of Ratepayer Advocates

OnGrid Solar

Pacific Gas and Electric Company

Peninsula Clean Energy

Pioneer Community Energy

Praxair

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.

SCD Energy Solutions

SCE

SDG&E and SoCalGas

SPURR

San Francisco Water Power and Sewer

Seattle City Light Sempra Utilities

Southern California Edison Company Southern California Gas Company

Spark Energy Sun Light & Power Sunshine Design Tecogen, Inc.

TerraVerde Renewable Partners

Tiger Natural Gas, Inc.

TransCanada

Troutman Sanders LLP Utility Cost Management Utility Power Solutions Utility Specialists

Verizon

Water and Energy Consulting Wellhead

Electric Company

Western Manufactured Housing Communities Association (WMA)

Yep Energy