

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



July 27, 2020

Advice Letter 4227-G/5784-E
4227-G-A/5784-E-A
4227-G-B/5784-E-B

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: Implementation of Emergency Consumer Protection Plan in Pacific Gas and Electric Company's Service Territory in Response to COVID-19 Pandemic Pursuant to Decision 19-07-015

Dear Mr. Jacobson:

Advice Letter 4227-G/5784-E, Advice Letter 4227-G-A/5784-E-A and Advice Letter 4227-G-B/5784-E-B is effective as of March 19, 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

Should any discrepancy or inconsistency be found in the provisions of approved advice letters (AL) 4227-G/5784-E and AL 4244-G/5816-E, please defer to latter for precedence

April 3, 2020

Advice 4227-G-A/5784-E-A

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Supplemental: Implementation of Emergency Consumer Protection Plan in Pacific Gas and Electric Company's Service Territory in Response to COVID-19 Pandemic Pursuant to Decision 19-07-015.

Purpose

Due to COVID-19's unique impact on customers' ability to see their doctors, PG&E is supplementing Advice 4227-G/5784-E by expanding its Emergency Consumer Protection plan to allow customers to self-certify their eligibility to enroll in the medical baseline program for up to one year from March 4, 2020, unless otherwise specified or extended by order of the Commission and/or the legislature. This Supplemental Advice Letter supplements the original Advice Letter but does not replace it in its entirety.

Background

On March 19, 2020, Pacific Gas and Electric Company (PG&E) submitted a Tier 1 Advice Letter, Advice 4227-G/5784-E, to implement an emergency consumer protection plan for customers who are experiencing a financial crisis due to the novel coronavirus (COVID-19) pandemic. PG&E submitted Advice 4227-G/5784-E pursuant to Ordering Paragraph (OP) 1 of Decision (D.) 19-07-015 and as informed by the March 17, 2020 letter to the energy utilities from California Public Utilities (Commission or CPUC) Executive Director Alice Stebbins.

In Advice 4227-G/5784-E, PG&E proposed the following emergency customer protections for our residential and small business customers within our service territory:

1. Suspending service disconnections for non-payment and waiving security deposits;
2. Implementing flexible payment plan options; and
3. Providing additional support for low-income and medical baseline customers.

Due to COVID-19 shelter-in-place requirements and changing medical practitioner priorities, many vulnerable customers are unable to consult with their medical providers and receive the medical certification. In this supplemental Advice Letter, PG&E seeks to

expand PG&E's Emergency Consumer Protection Plan due to the COVID-19 pandemic to allow customers to self-certify their eligibility to enroll in the medical baseline program. PG&E plans to extend this additional measure to customers affected by COVID-19 for up to one year from the March 4, 2020 emergency declaration, recognizing that the appropriate timeline will be further informed by subsequent direction from the Commission and/or the legislature.

Other than this addition, no other modifications to Advice 4227-G/5784-E are requested in this supplemental.

PG&E will utilize the Emergency Consumer Protections Memorandum Account (ECPMA) to record costs related to the emergency customer protections related to COVID-19. The protections will be in effect for up to one year, until March 4, 2021, unless otherwise specified or extended by order of the Commission.

Furthermore, PG&E continues to consider additional measures to support its customers and communities during this crisis and will seek Commission approval in other appropriate venues.

PG&E Will Provide Additional Support to Medical Baseline Customers.

Due to COVID-19's unique impact on customers' ability to see their doctors, PG&E is voluntarily implementing protections to support medical baseline customers as a result of this emergency. Specifically, PG&E will immediately provide the following protections applicable only to the COVID-19 emergency, for up to twelve months from March 4, 2020:

1. NEW with this Supplemental - Allowing customers to self-certify their eligibility to enroll in the medical baseline program;
2. Suspending all customer removals from the medical baseline program; and
3. No longer sending forms to customers that require them to re-certify for the medical baseline program through a doctor or other eligible medical professional.

During this time, PG&E will continue to send forms allowing customers currently enrolled in the medical baseline program to self-certify that they are still eligible to participate in the program and provide updated contact information for Public Safety Power Shutoff (PSPS) events. However, no customers will be removed from the program if they are unable to provide these forms to PG&E. PG&E will also modify its internal procedures and will accept Medical Baseline Allowances Applications and enroll customers (Sample Form 62-3481) where Part B, Section 3 of the form has not been completed by a medical practitioner. PG&E is also exploring an online option that blocks out the medical professional signature section. Otherwise, the online version of the form will be consistent with Section A.5 of Gas and Electric Preliminary Statement A.

Emergency Customer Protections Memorandum Account

PG&E will record costs associated with these customer protections in the ECPMA.¹ The costs recorded to this memorandum account will be incurred beginning March 4, 2020, which is the date of the Governor's state of emergency declaration. Pursuant to the Decision, PG&E will seek recovery of these costs in its General Rate Case.

No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, withdraw service, or conflict with any other schedule, or rule.

Tariff Revisions

In addition to the tariff revisions proposed in Advice 4227-G/5784-E, PG&E proposes the following additional revisions to its gas and electric tariffs:

- **Electric Rule 19, *Medical Baseline Quantities* –**
 - Add footnote to *Section B – Eligibility*, that states that Medical Baseline customers who are unable to see their qualified medical practitioner, may self-certify their eligibility to enroll in the medical baseline program for up to one year, until March 4, 2021.
 - Revise description of medical practitioners who can certify a customer for medical baseline to be consistent with PG&E's Sample Form 62-6481 – *Medical Baseline Allowance Application* as approved in Advice 3998-G/5342-E effective August 30, 2018.
- **Gas Rule 19, *Medical Baseline Quantities* –**
 - Add footnote to *Section B – Eligibility*, that states that Medical Baseline customers who are unable to see their qualified medical practitioner, may self-certify their eligibility to enroll in the medical baseline program for up to one year, until March 4, 2021
 - Revise description of medical practitioners who can certify a customer for medical baseline to be consistent with PG&E 's Sample Form 62-6481 – *Medical Baseline Allowance Application* as approved in Advice 3998-G/5342-E effective August 30, 2018.

The affected tariff sheets are listed on the enclosed Attachment 1. For the convenience of the reader, PG&E has provided redline version of the revised tariffs in Attachment 2.

¹ See D.19-07-015, OP 4, p. 66.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than April 23, 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 OP 8 of D.19-07-015, this advice letter is submitted with a Tier 1 designation.

Pursuant to General Order (GO) 96-B, Rule 5.1 and OP 8 of D.19-07-015, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice

submittal become effective concurrent with original Advice Letter 4227-G/5784-E, which is March 19, 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 R. 18-03-011. 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

Attachments

cc: Service List R.18-03-011



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 U39 M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 4227-G-A/5784-E-A

Tier Designation: 1

Subject of AL: Supplemental: Implementation of Emergency Consumer Protection Plan in Pacific Gas and Electric Company's Service Territory in Response to COVID-19 Pandemic Pursuant to Decision 19-07-015.

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.19-07-015.

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: 3/19/20

No. of tariff sheets: 6

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: See Attachment 1

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:

Clear Form

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
46395-E	ELECTRIC RULE NO. 19 MEDICAL BASELINE QUANTITIES Sheet 2	43303-E
46396-E	ELECTRIC TABLE OF CONTENTS Sheet 1	46333-E
46397-E	ELECTRIC TABLE OF CONTENTS Sheet 19	46290-E

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
35792-G	GAS RULE NO. 19 MEDICAL BASELINE QUANTITIES Sheet 2	34635-G
35793-G	GAS TABLE OF CONTENTS Sheet 1	35789-G
35794-G	GAS TABLE OF CONTENTS Sheet 7	35395-G



ELECTRIC RULE NO. 19
MEDICAL BASELINE QUANTITIES

Sheet 2

B. ELIGIBILITY (Cont'd.)

If you believe that you qualify, please contact your local PG&E office and request a copy of "Medical Baseline Allowance Application," Form No. 62-3481.

PG&E may also require you to have a licensed physician, a person licensed in accordance with the Osteopathic Initiative Act, nurse practitioner or physician assistant fill out the last page of the form to certify that you qualify for a Medical Baseline Quantity*.

(T)
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(T)

C. RECERTIFICATION

Customers certified by their qualified medical practitioner as having a permanent disability will need to self-certify their eligibility every two years using the "Medical Baseline Allowance Self-Certification," Form No. 61-0502, to ensure their continued residence at the service address, but will not need a doctor's signature.

(T)

Customers not having a permanent disability will need to self-certify each year, and will need a qualified medical practitioner's certification every two years using the "Medical Baseline Allowance Application," Form No. 62-3481.

(T)

D. LIFE-SUPPORT DEVICES

A life-support device is any medical device necessary to sustain life or relied upon for mobility. To qualify under this rule, the device must be used in the home and must run on electricity delivered by PG&E. (For devices that run on gas, see Rule 19 in the gas tariff schedule.)

The term "life-support device" includes, but is not limited to, respirators, iron lungs, hemodialysis machines, suction machines, electric nerve stimulators, pressure pads and pumps, aerosol tents, electrostatic and ultrasonic nebulizers, compressors, IPPB machines, and motorized wheelchairs.

E. HEATING AND AIR CONDITIONING

Special heating and/or air-conditioning needs will qualify you for a Standard Medical Baseline Quantity under this rule only if your main source of energy for heating or air conditioning is electricity delivered by PG&E. (If your main source of energy for heating or air conditioning is gas, please see Rule 19 in the gas tariff schedule.)

* Medical Baseline customers who are unable to see their qualified medical practitioner may self-certify their eligibility to enroll in the medical baseline program for up to one year, until March 4, 2021.

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(Continued)



ELECTRIC TABLE OF CONTENTS

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Advice 5784-E-A
Decision D.19-07-015

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted April 3, 2020
Effective March 19, 2020
Resolution _____



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GAS RULE NO. 19
MEDICAL BASELINE QUANTITIES

Sheet 2

B. ELIGIBILITY (Cont'd.)

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* Medical Baseline customers who are unable to see their qualified medical practitioner may self-certify their eligibility to enroll in the medical baseline program for up to one year, until March 4, 2021.

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(Continued)

Advice 4227-G-A
Decision D.19-07-015

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted April 3, 2020
Effective March 19, 2020
Resolution _____



GAS TABLE OF CONTENTS

Sheet 7

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Rule 18	Supply to Separate Premises and Submetering of Gas	22790,17796,13401-G
Rule 19	Medical Baseline Quantities	21119, 35794 ,21121-G (T)
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Rule 19.2	California Alternate Rates for Energy for Nonprofit Group-Living Facilities	32051,34221,17035,31217,34522-G
Rule 19.3	California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities	32053,34222,31219,34523-G
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(Continued)

Advice	4227-G-A	Issued by	Submitted	April 3, 2020
Decision	D.19-07-015	Robert S. Kenney	Effective	March 19, 2020
		Vice President, Regulatory Affairs	Resolution	

Attachment 2

Redline Tariffs



ELECTRIC RULE NO. 19
MEDICAL BASELINE QUANTITIES

Sheet 2

B. ELIGIBILITY (Cont'd.)

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GAS RULE NO. 19
MEDICAL BASELINE QUANTITIES

Sheet 2

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**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	Redwood Coast Energy Authority
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
	Energy Management Service	SCD Energy Solutions
Alta Power Group, LLC	Engineers and Scientists of California	
Anderson & Poole		
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Water Power and Sewer
California Energy Commission	ICF	Seattle City Light
California Public Utilities Commission	IGS Energy	Sempra Utilities
California State Association of Counties	International Power Technology	Southern California Edison Company
Calpine	Intestate Gas Services, Inc.	Southern California Gas Company
	Kelly Group	Spark Energy
Cameron-Daniel, P.C.	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Keyes & Fox LLP	Sunshine Design
Cenergy Power	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Center for Biological Diversity		TerraVerde Renewable Partners
		Tiger Natural Gas, Inc.
Chevron Pipeline and Power	Los Angeles County Integrated	TransCanada
City of Palo Alto	Waste Management Task Force	Troutman Sanders LLP
	MRW & Associates	Utility Cost Management
City of San Jose	Manatt Phelps Phillips	Utility Power Solutions
Clean Power Research	Marin Energy Authority	Utility Specialists
Coast Economic Consulting	McKenzie & Associates	Water and Energy Consulting Wellhead
Commercial Energy		Electric Company
Crossborder Energy	Modesto Irrigation District	Western Manufactured Housing
Crown Road Energy, LLC	NLine Energy, Inc.	Communities Association (WMA)
Davis Wright Tremaine LLP	NRG Solar	Yep Energy
Day Carter Murphy		
Dept of General Services	Office of Ratepayer Advocates	
Don Pickett & Associates, Inc.	OnGrid Solar	
Douglass & Liddell	Pacific Gas and Electric Company	
	Peninsula Clean Energy	