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Regulatory Relations

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Fax: 415-973-3582

June 29, 2020

**Advice 4269-G/5865-E**

(Pacific Gas and Electric Company U 39 M)

**Advice 2879-G/3564-E**

(San Diego Gas & Electric Company U 902 M)

**Advice 5655**

(Southern California Gas Company U 904 G)

**Advice 4238-E**

(Southern California Edison Company U 338 E)

**Advice 1137-G**

(Southwest Gas Corporation U 905 G)

**Advice 56-G**

(Alpine Natural Gas Operating Company U 909 G)

**Advice 395-E**

(Bear Valley Electric Service U 913 E)

**Advice 148-E**

(Liberty Utilities LLC U 993 E)

**Advice 620-E**

(PacifiCorp d/b/a Pacific Power U 901 E)

Public Utilities Commission of the State of California

**Subject: Joint Tier 1 Advice Letter Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074**

**Purpose**

Pursuant to California Public Utilities Commission (Commission or CPUC) Resolution E-5074, Pacific Gas and Electric Co. (PG&E) files this Tier 1 Advice Letter (AL) in

compliance with Ordering Paragraph (OP) 10, which directed PG&E, Southern California Edison (SCE), San Diego Gas & Electric Company (SDG&E), the Southern California Gas Company (SCG), Alpine Natural Gas Operating Company, Bear Valley Electric Service (BVES), a division of Golden State Water Company, Liberty Utilities (CalPeco Electric) LLC (Liberty CalPeco), PacifiCorp d/b/a Pacific Power, and Southwest Gas Corporation (joint investor-owned utilities (IOUs)) to submit a joint Tier 1 AL proposing a reporting template for Prime Contractors to use in their reporting to IOUs to monitor the proper use and track the balance of the advance payment funds made to Energy Savings Assistance (ESA) Prime Contractors and eligible entities.<sup>1</sup>

## **Background**

On March 4, 2020, Governor Gavin Newsom (Governor) declared a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.<sup>2</sup> On March 13, 2020, President Trump signed an Emergency Declaration to facilitate a federal response to the emerging COVID-19 pandemic.<sup>3</sup> On March 19, 2020, to protect public health, Governor Newsom ordered all individuals living in the State of California to stay at home or at their place of residence to slow the spread of COVID-19. In order to comply with this order, the IOUs temporarily suspended all face-to-face ESA Program activities.

On March 23, 2020, Executive Director, Alice Stebbins of the CPUC sent a letter requesting all IOUs offer a 30-day advance payment to ESA Prime Contractors to help maintain the economic stability of the ESA Program's workforce.

On April 7, 2020, Executive Director Stebbins sent a second letter to the IOUs clarifying guidance of the March 23, 2020 letter, and requesting all four large IOUs offer a second 30-day advance payment (total of 60-days) to ESA Prime Contractors to continue efforts to help maintain the economic stability of the ESA Program's workforce.

On April 24, 2020, the Commission issued Draft Resolution E-5074 to affirm and clarify the March 23, 2020 and April 7, 2020 letters sent by Executive Director Stebbins and provided further direction in response to additional elements proposed by the ESA contractors.

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<sup>1</sup> BVES, Liberty CalPeco, PacifiCorp, and Alpine Natural Gas Company will not be making advance payments pursuant to Resolution E-5074 and, therefore, are not included in this joint Advice Letter related to the Prime Contractor Reporting Template. Pursuant to Ordering Paragraph No. 3, BVES and Liberty CalPeco, did not offer the 60-day advance payment to their ESA contractors due the current contracts expiring before the end of 2020.

<sup>2</sup> Available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>

<sup>3</sup> Available at <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-nationalemergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>

On May 28, 2020, the Commission adopted Res. E-5074 ratifying elements of the Executive Director Stebbins's March 23, 2020 and April 7, 2020 letters. Specifically, Res. E-5074: 1) ratifies the 60-day advance payment to ESA Prime Contractors, 2) approves with modification a pay-for-performance mechanism for repayment known as the PPRS credit, 3) approves expedited IOU invoice payments, and 4) requires all IOUs (including Small and Multi-Jurisdictional Utilities (SMJUs)) to offer the advance payment to their ESA Prime Contractors.

On June 12, SDG&E on behalf of the IOUs notified the appropriate service lists and all Prime Contractors of the proposed percentage for the PPRS credit pursuant to OP 8 of Resolution E-5074.<sup>4</sup>

On June 15, the four large IOUs provided 30-day advance notice to Prime Contractors signifying July 15, 2020 as the start of the six-month PPRS credit-earning period in accordance with OP 7 of Resolution E-5074.<sup>5</sup>

### **Discussion**

As required by Resolution E-5074, the IOUs developed a reporting template for Prime Contractors, which will track and report the use of advance funds to ensure that ratepayer funds are used appropriately. <sup>6</sup> Pursuant to Section 1.2.1 of Resolution E-5074, the Prime Contractor monthly reporting template includes:

1. Amount of funds advanced by category;
  - a. Employee salary and wages;
  - b. Employer costs for continuing employee benefits;
  - c. Other employee costs deemed critical to sustaining the workforce;
  - d. Remaining amount of funds advance and associated costs (e.g. overhead)
2. The calendar period for which the advance funds covered costs;
3. The number of workers these funds sustained and for how long, at what salary/hourly rate (including data to show distribution, maximum, and minimum); and
4. A description of employee benefits covered.

The proposed reporting template is included as Attachment A, *ESA Prime Contractor Resolution E-5074 Advance Payment Reporting Template*. The Prime Contractor will provide the reports to the IOUs using this template, corresponding to the months or partial months that the advance covered.

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<sup>4</sup> Pursuant to discussions with counsel for BVES, Liberty CalPeco, PacifiCorp, and Alpine Natural Gas Company, those entities will not be making advance payments pursuant to Res. E-5074 and were therefore not included in the PPRS credit joint notice.

<sup>5</sup> Southwest Gas anticipates the six-month PPRS credit-earning period for its Prime Contractors will begin August 3, 2020.

<sup>6</sup> Resolution E-5074 OP 10 and pp. 13-14

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

### **Protests**

**\*\*\*Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com\*\*\***

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than July 20, 2020, which is 21 days<sup>7</sup> after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> 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.

Please submit protests or comments to this AL via e-mail to the addresses shown below on the same date it is mailed or delivered to the Commission.

### **For PG&E:**

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

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<sup>7</sup> The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

**For SDG&E:**

Attn: Greg Anderson  
Regulatory Tariff Manager  
E-mail: GAnderson@sdge.com

**For SoCalGas:**

Attn: Ray B. Ortiz  
Tariff Manager - GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No.: (213) 244-4957  
E-mail: ROrtiz@socalgas.com

**For SCE:**

Gary A. Stern, Ph.D.  
Managing Director, State Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
Rosemead, California 91770  
Telephone: (626) 302-9645  
Facsimile: (626) 302-6396  
E-mail: AdviceTariffManager@sce.com

Laura Genao  
Managing Director, State Regulatory Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2030  
San Francisco, California 94102  
Facsimile: (415) 929-5544  
E-mail: Karyn.Gansecki@sce.com

**For Southwest Gas:**

Attn: Mr. Justin Lee Brown  
Senior Vice President/General Counsel  
Southwest Gas Corporation  
P.O. Box 98510  
Las Vegas, NV 89193-8510  
Email: justin.brown@swgas.com  
Facsimile: 702-364-3452

**For Alpine Natural Gas Operating Company:**

Mike Lamond  
Administrator  
Alpine Natural Gas  
15 Saint Andrews Road, Suite 7  
Valley Springs, CA 95252  
Telephone: (209) 772-0336  
Email: mike@alpinenaturalgas.com

**For BVES:**

Nguyen Quan  
Manager, Regulatory Affairs Manager  
630 E Foothill Blvd  
San Dimas, CA 91773  
Telephone: (909) 394-3600 x664  
Email: NQUAN@GSWATER.com

**For Liberty:**

Daniel W. Marsh  
Manager of Rates & Regulatory Affairs  
Liberty Utilities (CalPeco Electric) LLC  
9750 Washburn Road  
Downey, CA 90241  
Telephone: (562) 299-5104  
Email: dan.marsh@libertyutilities.com

**For PacifiCorp:**

Pooja Kishore  
Regulatory Affairs Manager  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, Oregon 97232  
Telephone (503) 813-7314  
Facsimile: (503) 813-6060  
Email: californiadockets@pacificorp.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 June 29, 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 et al. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

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Erik Jacobson  
Director, Regulatory Relations

**Attachments:**

Attachment A: ESA Prime Contractor Resolution E-5074 Advance Payment Reporting Template

cc: Service List A.19-11-003 et al.



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID 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) #: 4269-G/5865-E et al.

Tier Designation: 1

Subject of AL: Joint Tier 1 Advice Letter Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074

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 #: Res. E-5074

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: 6/29/20

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 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**

### **ESA Prime Contractor Resolution E-5074 Advance Payment Reporting Template**

| Contractor Instructions:  | IOU Instructions:   |
|---|---|
| <p><i>Please use this workbook to report your usage of advance funds.</i></p>   | <p><i>On the monthly tab, please unlock the sheet, update cells B2 and C6 and change the names of the tabs if necessary, then relock the sheet.</i></p> |
| <p><i>For the reporting tab, please only include expenses related to working with this specific utility company.</i></p>  | <p><i>Insert your IOU's name on "Signature Page", cell B1. It will automatically populate throughout this workbook.</i></p>                             |
| <p><i>Please use the below cost categories to report on eligible costs. If you have any questions on the cost categories please consult the IOU in which this report is for.</i></p> <p><b><u>Labor costs and employee costs critical to sustaining the workforce:</u></b> gross wages and other payments for labor, including vacation, paid time off and sick pay; employer taxes on wages (e.g., social security, Medicare, etc.); workers compensation, unemployment and liability insurance; employer contributions for health care premiums, for retirement plans, and for other employee benefits.</p> <p><b><u>Overhead costs:</u></b> rent, mortgage or lease payments; utilities, including natural gas, electric service, telecommunications (phone and internet), and water &amp; sewage; property taxes.</p> |   |

|                                 |  |
|---------------------------------|--|
| <b>Utility Company Name:</b>    |  |
| <b>Contractor Company Name:</b> |  |

*I am an officer of the Contractor Company herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.*

*I declare under penalty of perjury that the foregoing is true and correct.*

**X**

\_\_\_\_\_

**Signee's Name:** \_\_\_\_\_  
**Signee's Role:** \_\_\_\_\_  
**Date:** \_\_\_\_\_



**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. |
| Alta Power Group, LLC                    | Energy Management Service                   | SCD Energy Solutions                    |
| Anderson & Poole                         | Engineers and Scientists of California      |   |
| 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         |
| Cameron-Daniel, P.C.                     | Kelly Group                                 | Spark Energy                            |
| Casner, Steve                            | Ken Bohn Consulting                         | Sun Light & Power                       |
| Cenergy Power                            | Keyes & Fox LLP                             | Sunshine Design                         |
| Center for Biological Diversity          | Leviton Manufacturing Co., Inc.             | Tecogen, Inc.                           |
| Chevron Pipeline and Power               | Los Angeles County Integrated               | TerraVerde Renewable Partners           |
| City of Palo Alto                        | Waste Management Task Force                 | Tiger Natural Gas, Inc.                 |
| City of San Jose                         | MRW & Associates                            | TransCanada                             |
| Clean Power Research                     | Manatt Phelps Phillips                      | Troutman Sanders LLP                    |
| Coast Economic Consulting                | Marin Energy Authority                      | Utility Cost Management                 |
| Commercial Energy                        | McKenzie & Associates                       | Utility Power Solutions                 |
| Crossborder Energy                       | Modesto Irrigation District                 | Water and Energy Consulting Wellhead    |
| Crown Road Energy, LLC                   | NLine Energy, Inc.                          | Electric Company                        |
| Davis Wright Tremaine LLP                | NRG Solar                                   | Western Manufactured Housing            |
| Day Carter Murphy                        | Office of Ratepayer Advocates               | Communities Association (WMA)           |
| Dept of General Services                 | OnGrid Solar                                | Yep Energy                              |
| Don Pickett & Associates, Inc.           | Pacific Gas and Electric Company            |   |
| Douglass & Liddell                       | Peninsula Clean Energy                      |   |