

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



February 9, 2021

Advice Letter 6028-E-A

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: Supplemental: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013.

Dear Mr. Jacobson:

Advice Letter 6028-E-A is effective as of December 21, 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

January 29, 2021

Advice 6028-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013.

Purpose

In compliance with Decision (D.) 18-08-013, issued on August 17, 2018 in Pacific Gas and Electric Company's (PG&E) 2017 General Rate Case (GRC) Phase 2 Proceeding, PG&E submits this information-only Advice Letter (AL) to report on its progress to increase Family Electric Rate Assistance (FERA) program enrollment.¹ On January 21, 2021 Energy Division requested PG&E clarify or remove language in its Advice 6028-E regarding FERA enrollment compensation for ESA contractors. PG&E has removed this language.

This Supplemental Advice Letter replaces Advice 6028-E in its entirety.

Background

The FERA program (also known as the Lower-Middle Income Large Household Program) provides rate assistance to large households of lower-to-middle-income customers.² The FERA program was designed to assist larger families that are ineligible for the California Alternate Rates for Energy Program (CARE) rate because their income level falls slightly above the CARE program income eligibility limit.

FERA is available for households of three or more individuals that have a total household income of between 200% plus \$1 and 250% of the Federal Poverty Level (FPL) guideline.³ The income threshold increases with each additional family member over three

¹ D.18-08-013, Ordering Paragraph 15, states, "PG&E shall report to Energy Division by the end of 2018, 2019, 2020, 2021, 2022, and 2023 on its progress to increase FERA subscription by submitting information-only advice letters that are served on the service list of this proceeding."

² The Commission authorized the FERA program in D. 04-02-057.

³ D.05-10-044 increased the lower income limits of the FERA Program were raised to 200%+\$1 of the Federal Poverty Guideline levels.

people. Eligible FERA participants currently receive an 18% bill discount for their electric usage.⁴

In PG&E's GRC Phase II proceeding, the California Public Utilities Commission (CPUC or Commission) expressed concern that the FERA program is not highly customer subscribed.⁵ Noting that PG&E's CARE customer participation rate is much higher than its FERA participation rate, the Commission ruled:

It is appropriate and necessary for PG&E to significantly increase its rate of FERA participation. Ultimately, PG&E should achieve a similar subscription level for FERA as for CARE. At this time, we require PG&E to make significant efforts to increase its FERA subscription level over the next six years, with the aim of achieving a 50% subscription level.⁶

The GRC Phase II decision prescribed several actions for PG&E to increase FERA participation, including: focusing efforts in the Central Valley (CV), conducting one or more workshops in the CV, and submission of an updated AL to inform the Commission of PG&E's plan to use unspent CARE marketing funds to increase FERA enrollment.⁷ Included in these requirements is an order to submit an information-only AL to report on FERA participation progress. The AL is to be submitted at the end of each year through 2023.⁸

Progress Report Toward Increasing FERA Enrollment

In compliance with D. 18-08-013, PG&E hereby reports on its progress toward increasing FERA enrollment from December 1, 2019 until November 30, 2020. FERA statistics for the month of December are not available at the time of submittal this AL.

⁴ In D.15-07-001, the Commission changed PG&E's FERA discount to a 12 percent effective discount as a single line-item on PG&E's bills. In 2018, Senate Bill (SB) 1135 amended Public Utilities Code Section 739.12 to increase the FERA discount to 18 percent effective January 1, 2019.

⁵ D.18-08-013, p. 74.

⁶ *Id.*, p. 75.

⁷ *Id.* PG&E submitted Advice Letter 3990-G-B/5329-E-B on October 8, 2018 to detail its marketing plans to increase FERA enrollment.

⁸ *Id.*, OP 15.

Table 1: FERA Program Enrollment from December 1, 2019 to November 30, 2020^(a)

Month/Year	FERA Estimated Eligible Customers	FERA Enrolled Customers	FERA Penetration Rate	Discount Provided to FERA- Enrolled Customers
December 2019	165,223	21,883	13%	\$573,468.50
January 2020	166,357	22,745	14%	\$655,321.87
February 2020	166,357	23,271	14%	\$538,494.98
March 2020	166,357	25,359	15%	\$578,267.60
April 2020	166,357	29,714	18%	\$685,385.95
May 2020	166,357	31,199	19%	\$766,588.05
June 2020	166,357	32,611	20%	\$1,065,771.28
July 2020	166,357	33,371	20%	\$1,309,469.97
August 2020	166,357	34,424	21%	\$1,368,346.73
September 2020	166,357	34,434	21%	\$1,418,867.34
October 2020	166,357	34,316	21%	\$1,196,455.82
November 2020	166,357	34,410	21%	\$819,100.46
Total	166,357	34,410	21%	\$10,975,538.55

(a) Final annual data for 2020 will be reported in the FERA Annual Report, to be submitted on May 1, 2021.

2020 FERA Program Marketing and Outreach Summary

Based on the directives in D. 18-08-013, PG&E developed and submitted the Marketing and Outreach (M&O) Plan for the Family Electric Rate Assistance (FERA) Program via PG&E's AL 3990-G-B/5329-E-B on October 8, 2018. The M&O Plan detailed PG&E's proposals for using available and unspent marketing funds allocated to the CARE program to increase customer enrollment into the FERA program.

In 2020, PG&E implemented and evolved the strategies outlined in the M&O plan to grow FERA awareness and participation:

- Build FERA awareness through continued marketing and outreach efforts over a period of years
- Test, learn and optimize, evolving outreach strategies and tactics based on results, and application of lessons learned
- Focus initial efforts on channels that have proven successful in driving CARE acquisition to learn how to effectively reach FERA customers
- Leverage customer insights and results from CARE research to inform FERA messaging development and testing for FERA outreach

Test plans and new targeting strategies were designed and implemented throughout the year to improve FERA enrollment. With the onset of the COVID-19 pandemic, PG&E quickly pivoted to adjust plans. Additional media, changes to creative and new channels were put in place to ensure that financial assistance support messages reached as many customers as possible. PG&E also conducted messaging research to inform new FERA creative development and further testing that will be used in 2021. Test plans and new targeting strategies were designed and implemented throughout the year to improve FERA enrollment. With the onset of the COVID-19 pandemic, PG&E quickly pivoted to adjust plans. Additional media, changes to creative and new channels were put in place to ensure that financial assistance support messages reached as many customers as possible. PG&E also conducted messaging research to inform new FERA creative development and further testing that will be used moving into 2021.

2020 Direct Mail and Email

The relatively small eligible customer population for FERA continues to present targeting challenges. In November of 2019 PG&E built a new FERA propensity model to identify those customers that are more likely to be eligible for FERA.⁹ The new FERA model follows the same methodology used to build the CARE propensity model, leveraging customer attributes and behaviors, including location, language preference, education, energy usage trends, bill amount, payment patterns and income levels. The model then creates a ranking of customers according to their likelihood or propensity to participate in FERA. The model divides the potentially eligible customer populations into ten groups or deciles – decile 1 is the most likely to participate, decile 10 is least likely. Each decile divides customers into a grouping of 10% of the eligible population (according to their ranking). Residential customers are put through the models and assigned both a FERA decile score and a CARE decile score.

The newly eligible audience segments for the Q1 2020 multi-touch direct mail and email campaign were selected using the lower decile score to assign a customer to either a CARE or a FERA segment. For example, if a customer had a FERA decile score of 2, and a CARE decile score of 3, they would be placed in the FERA eligible segment. If the decile scores were the same, the customer was categorized within the CARE segment based on the rationale that the larger CARE-eligible population would make someone more likely to be eligible for CARE. Other campaign audience segments included CARE and FERA Failed to Recertify (FTR) and CARE non-responders.¹⁰

⁹ PG&E plans to rebuild the CARE and FERA propensity models in 2021 to incorporate updated eligibility estimates from Athens Research that include adjustments to income data through the last quarter of 2020.

¹⁰ Failed to Recertify segments include customers who were previously enrolled on a program but did not re-enroll by the recertification date. These customers generally enroll at a high rate. CARE non-responders are customers who have received a previous marketing message but did not enroll. Because the FERA model was new in 2020 all customers were included in the FERA newly eligible segment.

Additionally, the Q1 campaign continued message testing designed to look at how the CARE and FERA audience segments responded to messages that were either CARE focused, FERA focused or featured CARE and FERA equally. The campaign deployed in January to approximately 390,000 customers, of which approximately 135,000 were designated as part of the FERA audience segments.

The campaign showed an increase in the FERA share of total enrollment volume compared to the Q2 2019 campaign¹¹ without a large impact on overall CARE enrollment. CARE saw a drop in overall share of enrollments from the CARE audience segment.

Assignment of “tied” decile scores to CARE segments favored CARE enrollment. PG&E adjusted the strategy in Q2 for the opportunity to drive increased FERA enrollments by assigning a customer to the FERA audience segment when the two decile scores are equal.

Enrollment rates for program-specific messaging were consistently higher for each audience segment than the combined CARE/FERA message. Repeated testing of these messages in Q2 showed similar results. PG&E plans to target program-specific messaging to the corresponding audience segment (i.e. CARE or FERA) going into 2021, with the combined message used strategically where a program specific message may not be sufficient.

Table 2: Q1 2020 Campaign Enrollments by Audience Segment and Creative Version

		CARE Enrollment Rate				FERA Enrollment Rate			
Creative Versions		FERA-Only	Combined CARE/FERA	CARE-Only	No Mail Control	FERA-Only	Combined CARE/FERA	CARE-Only	No Mail Control
Audience Segment	FERA Newly Eligible	1.23%	1.31%	-	0.35%	0.41%	0.17%	-	0.00%
	CARE Newly Eligible	1.67%	1.94%	2.30%	0.66%	0.32%	0.16%	0.12%	0.02%
	CARE Non-Responders	2.35%	2.59%	2.79%	1.16%	0.41%	0.18%	0.20%	0.04%

PG&E’s CARE and FERA acquisition direct mail and email 2020 campaign plans were set to continue quarterly but as the COVID-19 pandemic and financial impacts hit California, PG&E quickly pivoted and adjusted messaging, frequency and targeting for these campaigns.

¹¹ Q2 2019 was used as a performance benchmark because it was the first quarter FERA was prominently featured in acquisition campaigns. Target audience selection for FERA in 2019 was performed using the old CARE model and third-party data overlays for household income and household size.

Starting in April, PG&E moved the campaign cadence to a monthly drop, and increased distribution so more potentially eligible customers would see the message. Over 3.8 million emails were sent in April and June to all residential customers who were not already enrolled in CARE or FERA to heighten awareness of financial assistance programs for newly eligible, recently unemployed or underemployed customers.

Although the enrollment rates for the all residential email drops were lower than what would be seen with a more defined targeting approach (see Table 3 below for example), the campaigns drove over 40,000 CARE enrollments and 4,500 FERA enrollments, getting customers enrolled during a critical time when support was needed.

Table 3: Enrollment Rate for All Residential Emails vs. Campaigns Targeted with Propensity Models

Campaign	Number Contacted	Total Enrollments	Enrollment Rate
April All Res Email	2,120,360	30,634	1.44%
June All Res Email	1,729,258	16,206	0.94%
May Campaign	316,555	8,509	2.69%
Q2 Campaign (June/July)	470,158	15,050	3.20%

The expanded campaign targeting was assumed to reach newly eligible customers that previously may not have been qualified. PG&E added language about the updated income guidelines, as well as copy points to emphasize that recent job loss or wage reduction may have changed eligibility. Messaging was also added to the website to highlight that the household income calculation should consider the customer’s current situation, taking a forward-looking view of expected income.

In addition to the all residential emails, a Q2 direct mail and email campaign deployed in June and July. The Q2 campaign targeted approximately 300,000 customers and continued testing the new CARE and FERA propensity models. The campaign also tested the impact of marketing targeted to customers in zip codes more heavily impacted by COVID-19. A set of COVID zip codes was established, using data from the American Community Survey and Department of Labor to identify zip codes dominated by industries prone to increased unemployment following the COVID-19 outbreak. Audience segments were set up as “COVID zip codes” or “Non COVID zip codes.” Enrollment rates were higher in COVID zip code segments for both CARE and FERA.

Table 4: Q2 2020 Drop 1 Enrollments by COVID Zip Codes

Audience	Number Contacted	CARE Enrolled	Enrollment Rate	FERA Enrolled	Enrollment Rate
Non-COVID Zip Codes	86,805	1,601	1.84%	124	0.14%
COVID Zip Codes	197,628	5,878	2.97%	341	0.17%

With CARE penetration rates over 100% by mid-year, PG&E shifted the Q3 and Q4 campaigns to more heavily feature FERA messaging to grow FERA enrollment. The Q3 campaign targeting went outside of the models to focus FERA messages in under-penetrated areas. The direct mail list included approximately 302,000 customers in zip codes defined as having lower CARE penetration (below 90% penetration rate). The email list included over 1.4 million customers not enrolled in CARE or FERA, with a valid email address. The email list was split into two distinct groups to track response for customers in under penetrated zip codes (less than 70% penetration rate) and those zip codes with higher penetration (above 70% penetration rate).

Overall enrollment rates for the Q3 campaign were lower than the Q2 campaign (Q3 total campaign enrollment rate of 0.87% versus Q2 total campaign enrollment rate 3.20%). The number of enrollments was also lower despite the much larger number of customers contacted in Q3 (1.7 million versus 470,000 in Q2). The Q3 enrollment rates for email were higher for both CARE and FERA in the segment for zip codes that were over 70% penetration.

The direct mail list strategy for Q4 was adjusted slightly to broaden the target to customers in zip codes with less than 80% penetration. The email strategy was held constant from Q3 to gather more data on enrollment performance in under-penetrated areas. Initial response data for Q4 appears to show similar results, with a higher enrollment rate for email segments targeted to zip codes with higher penetration rates. PG&E plans to conduct further analysis upon completion of the campaign.

FERA Message Research and Testing

In Q3, PG&E conducted FERA messaging research with an online customer panel to gain insight to support ongoing creative development. Over 150 customers responded, having been randomly shown several variations of FERA messages. Customer responses indicate that most customers were able to identify the differences between the CARE and FERA programs based on the program description. Messages that provide clarity around the program requirements and make the process feel easy are more likely to encourage the customer to apply. Messages that refer to the income guidelines chart and include points such as “it only takes five minutes to apply” and “no proof of income required to apply” are most effective in portraying the application process as easy.

Because the name of the program – *Family* Electric Rate Assistance – could be misleading to a customer trying to determine if they qualify, PG&E included messaging versions to describe different household types that may qualify for FERA. The intent was to test customer understanding that a household of three or more people doesn't necessarily mean three people who are members of one family. For example, a message version included language such as "roommates may apply" and "any household with 3 or more people may qualify." Participant responses showed that this message most drastically changes customers impression of who is eligible, breaking the perception that the people in the households must be related.

The insights from the research were used to inform development of new FERA focused direct mail and email messages. In Q4, four new email versions were created based on two key message themes: Ease and Household Composition. The test versions were deployed the first week of November with the existing FERA email message as the "Control." Results showed the new Ease creative with the "no proof of income required to apply" lead message, outperformed all other creative versions in open rate and clicks. However, enrollment rates for all versions were similar based on data through the end of November. PG&E plans to confirm the results by testing the winning Ease version against the Control message for the second wave of the Q4 campaign on January 2, 2021.

PG&E also developed three new direct mail packages which are being tested in December. Rather than conduct in-market testing of multiple packages, PG&E will leverage a new method of direct mail testing that pairs a survey research approach with online mailbox simulation technology. The experiment creates an animated visual process to mimic the actual behavior of consumers as they go through simulated mail retrieval from the mailbox and gathers insight into decision-making behavior (i.e., will the customer open now, set it aside for later, trash it or shred it), how the customer reviews the content and captures their response to the different element (pieces, formats, visuals, messages, etc.). Participants identify the parts of the mail package that they like or dislike and explain why. PG&E plans to use the test to identify a winning concept. Customers feedback will also be used to refine the concepts to make them stronger prior to production.

Digital Advertising

In 2020, PG&E deployed a digital media campaign for FERA with multiple layers of paid digital media efforts including search, Gmail ads, video, display and native (contextual) advertising that is always-on throughout the year. Creative is developed in both Spanish and English. The digital campaign buy was territory-wide but added a layer of increased spending in select zip codes as part of the strategy to increase awareness with Hard-to-Reach customers. Zip codes were identified as Hard-to-Reach based on lower CARE and

FERA penetration rates, and those that were in designated rural and/or high poverty areas.¹²

As part of the response to COVID-19 and the increased number of eligible customers, PG&E invested more in digital channels and digital display targeting efforts were enhanced to reach new customers on career/employment sites. Social media was added to the plan mid-year with promoted posts placed on Facebook and Instagram.

New channels and tactics were added to the media plan, including advertisements on the Fresh EBT mobile application (in English and Spanish language) which allows customers to instantly check their EBT balance, clip online coupons, and explore job posts and other money-making activities making it the ideal environment to promote CARE and FERA. PG&E also added Google Discovery Ads, a new tactic to help reach newly eligible FERA customers because it uses past behavior to serve up relevant content and ads. For example, if customers are searching for things like “unemployment claims”, “government checks”, “can’t pay my bills”, they could be served with a CARE/FERA ad.

PG&E also developed and launched digital video ads that were added to the media plan to capture increases in digital video viewing as customers cut broadband TV from their budgets.

Through the first nine months of 2020, landing page visits and completed applications from the FERA media campaign surpassed 2019 campaign performance. The campaign included almost 103 million impressions¹³ through September, and CARE/FERA landing page visits were up 185% over full year 2019. The campaign generated more than 19,400 completed applications, 209% higher than 2019, and showed greater efficiency including a cost-per-completed application that was 46% lower than 2019, and a higher click through rate (0.16% in 2020 versus 0.10% in 2019). All digital media channels, plus traditional media activity executed as part of the Hard-to-Reach targeted campaign (discussed in the section below) helped contribute to the total completed applications with a majority 70% share from display, 16% from Gmail ads, 6% from native advertising, 4% from SEM, 3% from Google Discovery ads, and Social placements <1%.

Hard-to-Reach Customer Media Campaign

A coordinated awareness media campaign focused on hard-to-reach audiences launched at the end of April and continued through July. The campaign included radio, digital radio, TV interviews, home-delivered print and laundromat posters. As described for the digital

¹² A High Poverty household has income at or below 100 percent of the Federal Poverty Level Guidelines. Rural areas are generally defined as those isolated from larger metropolitan areas, by distance or other physical features. PG&E has identified specific zip codes and counties within PG&E’s territory that fall within these definitions for targeting purposes. The 2020 Hard-to-Reach zip code targeting list included 367 (out of 1,001) prioritized zip codes which capture most of the CARE eligible, non-enrolled, FERA eligible, non-enrolled, Rural and High Poverty customers.

¹³ An impression measures how many times an advertisement is retrieved from its source and shown on a web page or other online media.

campaign, zip code targeting was used to identify key areas of opportunity for increased program enrollment looking at areas of sizeable numbers of estimated unenrolled CARE and FERA customers, high poverty and rural zips.

The Q2 awareness media tactics delivered a total of approximately 40 million paid impressions. Print tactics were distributed to a total of 5.1 million households. Digital radio enabled targeting in the Hard-to-Reach zip codes, and nearly 100,000 broadcast and traffic radio sponsorship spots were purchased to run in priority markets with significant volume of CARE and FERA eligible, non-enrolled.¹⁴ A total of 31.2 million paid impressions were delivered by broadcast, traffic and digital radio in addition to the always-on digital campaign. Spanish language TV interview segments that ran via Univision in five Designated Market Areas (DMAs) generated approximately 195,000 impressions.¹⁵

CARE/FERA Landing Page

Throughout 2020, PG&E leveraged www.pge.com/carefera to engage with customers; highlighting information about respective program tips and tools to support their energy management journey. In order to make it easier for customers to get enrolled in the right program, PG&E campaigns routinely drove online visitors to a combined CARE and FERA website landing page. This page presents program requirements, key program differences and prominently links to the joint application form for CARE and FERA. Online enrollments accounted for 85% of the 2020 FERA new enrollments (21,114) through November.

At the end of September, PG&E launched a new web tool on the CARE and FERA landing page intended to make it easier for customers to determine whether they qualify for CARE or FERA, and then move them into the application process. PG&E plans to test use of the tool in digital campaigns in 2021, as well as revisions to the landing page to give the tool more prominence.

Bill Inserts

Bill inserts remain an efficient method to reach customers. The CARE/FERA application was inserted in the bill package four times throughout the year. The June insert including the updated income guidelines for CARE and FERA was sent to approximately 2.5 million non-CARE customers. Bill inserts remain an effective enrollment channel, delivering 381 FERA enrollments through November.

¹⁴ Radio markets included Sacramento-Stockton-Modesto, Fresno-Merced, Bakersfield and Salinas-Monterey.

¹⁵ TV interview DMAs: San Francisco, Sacramento, Fresno, Bakersfield and Monterey.

PG&E Earned Media and Owned Assets

PG&E continued to deploy an email newsletter targeted to approximately 1.3 income qualified customers. CARE and FERA were featured in the February, April, May and December issues. Additionally, PG&E promoted FERA specifically in the November issue.

PG&E promoted CARE and FERA in the electronic version of the April and October Home Energy Reports (eHERs), while the May print version promoted CARE and FERA and the September version promoted FERA.

PG&E participates in media interviews throughout the territory and distributes press releases throughout the year to promote CARE and FERA. Several media releases were sent between March and December to remind customers of the Ongoing Support Available to Help with the COVID-19 Pandemic Impacts. Interviews and articles directed customers to PG&E's Safety Action Center, which helps Californians navigate the current public health crisis at home, provides access to resources, and highlights CARE and FERA programs as part of the COVID-19 customer support and how we can help customers lower bills during this emergency.

Outbound Financial Assistance

In May 2020, PG&E stood up a new outbound calling campaign in order to reach customers with past due amounts. The outbound calls provided customers with flexible pay plans as well as information about CARE, FERA, Medical Baseline, and other agency assistance programs. Customers who were deemed to be eligible for a specific program were enrolled.

The campaign attempted to contact 99,072 customers. Customer Service Representatives (CSRs) were able to make contact with 24,241 of them directly. The customers who could not be reached received a voicemail with information regarding financial assistance programs.

The campaign was also successful in identifying \$3.7M in potential savings from rate changes. Customers with a past due balance were directed to LIHEAP where they received pledges totalling 337,658K.

Table 5: Outbound Campaigns to Financial Challenged Customers

	Dynamic Financial Assistance Outcall Campaign (5/1 – 12/8)	Customer Service Office Outcall Campaign (11/1 – 12/14)	Totals
Number of Customers Reviewed	92,832	25,884	118,716
Number of Customers Called	76,604	22,468	99,072
Spoke to Customers	18,893	5,348	24,241
Of Those Spoken With, # accepted an Offer	11,460	2,717	14,177
Enrolled in a Pay Plan	1,983	177	2,160
Enrolled in CARE	3,554	46	3,600
Enrolled in FERA	74	0	74
Enrolled in Medical Baseline	1,452	705	2,157
Enrolled in Budget Billing	302	35	337
Enrolled in Paperless Billing	439	12	451
Number of Customers who received a LIHEAP Pledges after Outcall	343	7	350
LIHEAP Pledge Amounts	\$331,250	\$6,408	\$337,658
Total Customers that Could Benefit from a Rate Change	7,412	628	8,040
Total Rate Change Savings Identified	\$3,467,902	\$202,186	\$3,670,088
Number of customers that Requested Rate Change	774	11	785
Savings from Completed Rate Changes	\$232,944	\$890	\$233,834

FERA Retention Campaigns

Retention campaigns were paused in April as Emergency Customer Protections were put in place to support customers during the COVID-19 pandemic.¹⁶ PG&E plans to restart retention campaigns once the customer protections are discontinued and recertifications begin again.

Prior to the pause of recertification activities, PG&E's FERA retention outreach focused on reducing attrition through failure to recertify for the program. FERA-enrolled customers are required to recertify their eligibility every two years (every four years for those on a fixed income). A monthly auto-recertification campaign launched in 2019, and PG&E continued this effort through Q1 2020, automatically recertifying customers in

¹⁶ Resolution M-4842, *Emergency Authorization and Order Directing Utilities to Implement Emergency COVID-19 Protections*.

Deciles 1, 2 and 3.¹⁷ PG&E sent these customers email notification to alert them that they were automatically re-enrolled in the FERA Program and no further action is required to continue to receive the FERA discount. The email indicated that the customer can opt-out of the program if they are no longer qualified.

As part of the Q1 campaign, PG&E deployed the FERA recertification reminders to customers in deciles 4-10. The campaign mirrors the approach that has been in place for CARE since 2015. Customers with a valid email received email reminders at 120-days, 90-days, 60-days and 30-days prior to the recertification date with a call-to-action to re-enroll before their program end date. Additionally, a direct mail letter and application are sent at the 90-day mark to all customers due to recertify.

Due to COVID-19 and shelter in place orders for non-essential work, most of the CBOs outreach activities were severely impacted in 2020, with most CBOs curtailing or cancelling activities and serving significantly fewer clients. All tabling and event attendance were canceled by cities and counties in Q1, Q2, Q3 and Q4, significantly impacting the CBO channel effectiveness in acquiring new enrollments for FERA eligible customers in this program year. With PG&E's local branch offices closed, the usual tabling events by CBOs in our offices were put on hold until 2021.

In Q2, Q3 and Q4, PG&E held trainings with CBOs to refresh users on use of pge.com to complete online enrollments. In general CBOs are seeing fewer enrollments as PG&E focused on identifying new CBOs whose client based represent FERA eligible population. Many CBOs indicated that the CARE Outreach contractor (COC) model may no longer be a good way to engage CBOs as the majority of clients served are already enrolled and a different type of outreach model may be needed prospectively.

PG&E added two foodbanks and a medical clinic partnership for distributing CARE/FERA applications, as they are directly serving the target populations that may be compatible with the CARE and FERA target audience.

Conclusion

In conclusion, this letter contains the 2020 FERA results as is required by Decision (D.) 18-08-013, issued on August 17, 2018

¹⁷ The FERA propensity model assigns customers a Decile score from 1 to 10, with 1 being the most-likely to be FERA-eligible and 10 being the least likely to be FERA-eligible. CARE auto-recertification is executed for Deciles 1-2, but since FERA has a much smaller eligible population and slightly higher income qualification, PG&E expanded auto-recertification to Deciles 1-3 for FERA.

Protests

This is an information-only AL submittal. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this AL and is not subject to protest. Instead, PG&E is reporting progress to increase FERA program enrollment.

Effective Date

In conjunction with original Advice 6058-E, PG&E requests that this supplemental information-only advice submittal become effective December 21, 2020.

Notice

In accordance with General Order 96-B, Section IV, a copy of this AL is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for A.16-06-013, A.14-11-007 et al., and 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. AL submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service Lists in A.16-06-013, A.14-11-007 et al., and 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 U39 E)

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) #: 6028-E-A

Tier Designation: 1

Subject of AL: Supplemental: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013.

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.18-08-013.

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: 12/21/20

No. of tariff sheets: N/A

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
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
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
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF

IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
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
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy