

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4349G/6030E
As of February 1, 2021

Subject: Pacific Gas and Electric Company's and Southern California Gas Company's Request to Shift Funds in the Energy Saving Assistance Program

Division Assigned: Energy

Date Filed: 12-22-2020

Date to Calendar: 12-25-2020

Authorizing Documents: D0811031

Disposition:	Accepted
Effective Date:	01-21-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

PGETariffs@pge.com

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:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

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.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

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



December 22, 2020

Advice 4349-G/6030-E

(Pacific Gas and Electric Company ID U 39 M)

Advice 5744

(Southern California Gas Company)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company's and Southern California Gas Company's Request to Shift Funds in the Energy Saving Assistance Program

Purpose

Pursuant to California Public Utilities Commission (Commission or CPUC) Decision (D.) 08-11-031, as modified by D.10-10-008, D.16-11-022, and D.17-12-009, Pacific Gas and Electric Company (PG&E) and Southern California Gas Company (SoCalGas; together the Joint Utilities) hereby request approval of this Tier 2 Advice Letter¹ (AL) to shift Energy Saving Assistance (ESA) Program funds between ESA program categories. PG&E requests permission to shift \$90,000 and SoCalGas requests permission to shift \$75,000, from their 2020 Multifamily Common Area Measure (MF CAM) Initiative Administrative budget category into their 2020 ESA Program Study budget category respectively.

The Joint Utilities are not requesting any increase in authorized funds as approved in D.16-11-022, D.17-12-009, Resolution G-3531 (PG&E), Resolution G-3532 (SoCalGas), PG&E AL 3990-G-G/5329-E-A Non-Standard Disposition Letter, and SoCalGas Supplemental AL 5501-G-A Disposition. The fund shifts being requested result in less than 1% of each Joint Utilities' total authorized budget.

PG&E does not request to shift funds between gas and electric programs.

¹ D.17-12-009, Attachment 1 (Modified D16-11-022), p.354, directs a Tier 2 Advice Letter to request fund shifting for the ESA Program.

Fund Shifting Background

Current fund shifting and carry-over rules are discussed in D.17-12-009, which revised earlier fund shifting rules by allowing fund shifting requests to be filed by Advice Letter.²

The Commission adopted fund shifting provisions for the ESA and California Alternate Rates for Energy (CARE) Programs in D.08-11-031, as modified by D.10-10-008. The fund shifting provisions were extended in D.12-08-044,³ D.14-08-030,⁴ D.15-12-024,⁵ and D.16-06-018⁶ whereby the Commission extended the fund shifting provisions to the ESA Program cycle 2012 through 2014 and to program years 2015 and 2016. D.10-10-008 modified Ordering Paragraph (OP) 85 of D.08-11-031 and set forth the fund shifting provisions applicable to the ESA and CARE Programs. Section b.(3) and (4) of Ordering Paragraph 85 states:

(3) Administrative Law Judge's Prior Approval: For any shifting of funds, within or out of cycle, except for "carry forward" funding considered by the Commission through budget applications, the Administrative Law Judge's prior written approval is required if any of the following applies:

- i. Shifting of funds into or out of different program categories including, but not limited to: (a) administrative overhead costs, (b) regulatory compliance costs, (c) measurement and evaluation, and (d) the costs of pilots and studies;
- ii. Shifting of funds into or out of Education subcategory;
- iii. Shifting of funds between gas/electric programs; and/or
- iv. Shifting of funds totaling 15% or more of the total current annual LIEE program budget.

(4) The IOUs shall secure prior written approval of the fund shift from the Administrative Law Judge when required by subsection b.(3) above, of this ordering paragraph, by filing a motion pursuant to Article 11 of the Commission's Rules of Practice and Procedure. Upon showing of good cause, the Administrative Law Judge may issue a ruling approving the requested fund shift. IOUs, in the motion, must show good cause by setting forth the following:

- i. The reason(s) why such fund shifting is necessary;

² D.17-12-009, Attachment 1 (Modified D16-11-022), Section 5.1.3, pp.352-355 and Section 5.1.5, pp.356.

³ The Commission extended the fund shifting rules for program cycle 2012-2014.

⁴ The Commission extended the fund shifting rules for program cycle 2015 bridge program year.

⁵ The Commission extended the fund shifting rules for January 1, 2016 – June 30, 2016.

⁶ The Commission extended the fund shifting rules for July 1, 2016 – December 31, 2016.

- ii. The reason(s) why such motion could not have been brought sooner; and
- iii. Justification supporting why the proposed shifting of funds would promote efficient, cost effective and effective implementation of the LIEE⁷ program.

Section 5.1.3. of D.17-12-009 allowed the IOUs to file an Tier 2 AL to shift funds in lieu of filing a motion as previously directed by OP 85, Section b.(4) of D.10-10-008.⁸

In addition to granting Energy Division (ED) the authority to approve shifting of up to 25% of underspent funds, D.17-12-009 specifies that funds may not be carried over to different budget line items, or between gas and electric programs unless requested and approved by the AL process.⁹

The Joint Utilities' requested fund shifts amount to less than 1% of the ESA Program budget, and do not increase the amount authorized in D.16-11-022 and Resolution G-3531. In light of the foregoing, the Joint Utilities request Commission approval to:

- Shift funds from one ESA Program category into another within the same program cycle.
 - For PG&E: shift \$90,000—\$62,550 Electric and \$27,450 Gas¹⁰—underspent 2020 MF CAM Administration funds to 2020 Studies).
 - For SoCalGas, shift \$75,000 underspent 2020 MF CAM Administration funds to 2020 Studies).

The justification for this request is explained below.

⁷ The ESA Program was formerly known as the Low Income Energy Efficiency (LIEE) Program.

⁸ D.17-12-009, Attachment 1 (Modified D16-11-022), at p.356 states: "The IOUs may request to Energy Division through the fund shifting Advice Letter to use underspent funds to augment subsequent program year budgets upon a showing that such shifting is necessary to overcome barriers that reasonably led to the underspending. Energy Division may approve such shifting of up to 25% of underspent funds, and the rest will be applied to offset future collections."

⁹ D.17-12-009, Attachment 1 (Modified D16-11-022), p.356: "Carry-over funds must follow the revised fund-shifting rules. For example, funds may not be carried over to a different budget line item or be transferred between electric and gas measures unless requested and approved by the fund shifting Advice Letter process." And pp.353-354: "We delegate to the Commission's Energy Division the discretion to approve fund shifts between gas and electric funds up to 25% of [sic] between each budget category as needed to achieve program goals and objectives as a Tier 2 fund shifting Advice Letter."

¹⁰ In accordance with PG&E's 2020 budget split of 69.5% Electric and 30.5% Gas, as authorized in Energy Division's Non-Standard Disposition Letter of PG&E Advice 3990-G/5329-E, 3990-G-A/5329-E-A, 3990-G-B/5329-B.

MF CAM Process Evaluation

The four Investor Owned Utilities (IOUs)¹¹ in consultation with ED propose to conduct a joint process evaluation of their MF CAM Initiatives. Southern California Edison Company (SCE) and San Diego Gas and Electric Company (SDG&E) will use unallocated and unspent Study Rapid Deployment funding authorized in D.16-11-022 for the Joint Study. PG&E and SoCalGas have each exhausted their Study Rapid Deployment funding for other studies this cycle; therefore, are proposing to use unspent MF CAM Administration funds for their respective share of the Process Evaluation.

PG&E and SoCalGas will commit and carry-over funding authorized for this Joint IOU Statewide MF CAM Process Evaluation from 2020 into the Bridge Period and the MF CAM Process Evaluation will begin during the 2021 Bridge Period. The total statewide study budget for the MF CAM Process Evaluation is \$300,000 and will be funded at the IOUs' current study funding split of 30% each for PG&E and SCE, 25% for SoCalGas, and 15% for SDG&E.

The process evaluation has two primary interrelated objectives: (1) To assess the relative effectiveness of the IOUs' current MF CAM delivery and implementation strategies, and provide recommendations where improvements could be made; (2) to identify what data currently exist and may be needed to assess performance and success as defined by the core objectives of the initiative. Results and recommended data collection that are later incorporated into program implementation processes will facilitate more reliable evaluations of the impacts of common area measures installed in Multifamily (MF) properties. In addition, results of the process evaluation are expected to inform future program designs targeting the low-income MF sector.

Although D.17-12-009 does not explicitly discuss performing an evaluation of the MF CAM initiative or a fund shift from the MF CAM Administrative category to the Study category, PG&E and SoCalGas provide that: 1) the dollars shifted for the Joint Utilities' portion of the study will not taking funding away from MF CAM funding designated to provide customer energy efficiency measures since the Joint Utilities are requesting it to come from the administrative portion of MF CAM, and 2) the results of this process evaluation are anticipated to provide a positive impact on MF customer experience going forward as the IOUs apply the lessons learned to new MF programs.

This AL is filed as timely as possible, following consultation with ED on the Study parameters and budget, and ED's final approval of the ESA MF CAM Process Evaluation Scope of Work on December 11, 2020.

¹¹ The four IOUs are: PG&E, SoCalGas, Southern California Edison Company, and San Diego Gas and Electric Company.

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

Protests

Pursuant to CPUC General Order 96-B, Section 7.5.1, PG&E and SoCalGas hereby request the protest period be waived.

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and D.17-12-009¹², this advice letter is submitted with a Tier 2 designation. PG&E requests that this **Tier 2** advice submittal become effective on regular notice, January 21, 2021 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 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. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service Lists A. 14-11-007 et al. and A.19-11-003 et al.

¹² D.17-12-009, Attachment 1 (Modified D16-11-022), at p.356.



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 U 39 M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 4349-G/6030-E

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company's and Southern California Gas Company's Request to Shift Funds in the Energy Saving Assistance Program

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.08-11-031

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: N/A

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: 1/21/21

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:

Clear Form

**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
Semptra 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