

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4416G/6149E
As of July 16, 2021

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

Division Assigned: Energy

Date Filed: 04-02-2021

Date to Calendar: 04-09-2021

Authorizing Documents: D0811031

Authorizing Documents: D1010008

Authorizing Documents: D1611022

Authorizing Documents: D1712009

Disposition:	Withdrawn
Effective Date:	None

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



Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

(415) 973-8794

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



Sidney Bob Dietz II
Director
Regulatory Relations

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

Fax: 415-973-3582

June 22, 2021

ED Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Subject: *Withdrawal of Advice Letter 4416-G/6149-E, Pacific Gas and Electric Company's Request to Shift Funds in the Energy Saving Assistance Program*

Dear Energy Division Tariff Unit:

In accordance with General Order 96-B, Section 5.3, Pacific Gas and Electric Company (PG&E) hereby withdraws the above-referenced advice letter without prejudice.

On April 2, 2021, PG&E submitted Advice Letter (AL) 6111-E, which is currently under review. PG&E had specified in its Bridge Funding Advice Letter 4351-G-B/6035-E-B, that the 2021 ESA bridge funding sources would be unspent funds first, and then new revenue collections if needed.¹ PG&E included enough gas funding in its Annual Gas True-up (AGT) to cover the ESA shortfall, thus fund shifting is not required.

In accordance with General Order 96-B, Section 5.3, this withdrawal letter is being submitted in the same manner and served on the same persons as the advice letter.

Sincerely,

/S/
Sidney Bob Dietz II
Director, Regulatory Relations

cc: Service List A.19-11-003

¹ PG&E Advice Letter 4351-G-B/6035-E-B, p.8.

April 2, 2021

Advice 4416-G/6149-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric 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) hereby requests approval of this Tier 2 Advice Letter¹ to shift Energy Savings Assistance (ESA) Program funds. PG&E requests permission to shift funds from the electric to gas commodity.

Fund Shifting Background

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.12-08-044,² D.14-08-030,³ and D.15-12-024,⁴ whereby the Commission extended the fund shifting provisions to the ESA Program cycle 2012 through 2014 and to program years 2015 and 2016. Ordering Paragraph (OP) 85 of D.10-10-008 sets forth the fund shifting provisions applicable to the ESA and CARE Programs. Section b.(3) and (4) of Ordering Paragraph 85 stated that IOUs file a motion to obtain the Administrative Law Judge's prior approval for "shifting of funds between gas/electric programs," and that this request include:

- i. The reason(s) why such fund shifting is necessary;
- ii. The reason(s) why such motion could not have been brought sooner; and

¹ D.17-12-009, p.363 (redline version), directs a Tier 2 Advice Letter to request fund shifting for the ESA Program.

² The Commission extended the fund shifting rules for program cycle 2012-2014.

³ The Commission extended the fund shifting rules for program cycle 2015 bridge program year.

⁴ The Commission extended the fund shifting rules for program cycle 2016 bridge program year.

- iii. Justification supporting why the proposed shifting of funds would promote efficient, cost effective and effective implementation of the LIEE⁵ program.⁶

Section 5.1.3. of D.17-12-009 directed the IOUs to file an Advice Letter to shift funds in lieu of filing the motion previously directed by OP 85, Section b.(4) of D.10-10-008.⁷ In addition to granting Energy Division the authority to approve shifting of up to 25% of underspent funds, D.17-12-009 specified that shifting funds between gas and electric programs must be requested and approved by the Advice Letter process.⁸

By December 31, 2020, PG&E's ESA program had \$197.9 million in unspent funds of which \$163.6 million is electric funds and \$34.2 million is gas funds. The authorized January 1, 2021-June 30, 2021 ESA Bridge Funding budget is \$127.3 million which includes \$77.7 million in electric funds and \$49.7 million in gas funds. The gas unspent fund is less than authorized gas budget therefore PG&E requests to shift \$15.4 million from Electric unspent fund to Gas unspent fund. This fund shift request does not increase the amount authorized in Energy Division's Disposition Letter of PG&E Advice Letter 4351-G-B/6035-E-B.

⁵ ESA was formerly known as the Low Income Energy Efficiency (LIEE) Program.

⁶ D.10-10-008, OP.84, Section b.(3) and (4).

⁷ D.17-12-009 at p.366 (redline version) 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."

⁸ D.17-12-009, Attachment 1 (Modified D16-11-022), p.368 (redline): "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."

Table 1: ESA Request for Electric to Gas Fund Shift (\$ in million)

Authorized 2021 Budget	Electric	Gas	Total
ESA Program (Bridge Funded) (a)	\$50.7	\$38.7	\$89.5
PPRS (b)	\$5.2	\$2.3	\$7.4
Multi-family/CAM (c)	\$21.8	\$8.7	\$30.4
Total Authorized Budget (d)	\$77.7	\$49.7	\$127.3
Unspent Fund Balance (as of 12/31/2020)	\$163.6	\$34.2	\$197.9
Request Fund Shift from Electric to Gas	\$(15.4)	\$15.4	\$0
Unspent Fund Balance After Fund Shift	\$148.2	\$49.7	\$197.9

(a) Authorized in Energy Division's Disposition Letter of PG&E Advice Letter 4351-G-B_/6035-E-B.

(b) Authorized in Resolution E-5074.

(c) Committed 2017-2020 ESA funding was authorized to be carried over in D.19-06-022.

(d) Total Authorized 2021 budget as reported in the ESA and CARE February monthly report, filed on March 22, 2021

The justification for this request is explained below.

Discussion

A. PG&E requests authority to shift funds from electric to gas commodity of ESA unspent funds.

PG&E currently has less unspent funds available in gas than electric. PG&E anticipated the possibility that it would need to shift funds between electric and gas to complete 2021 Bridge Funding activities. PG&E informed Energy Division of this possibility in Advice 4351-G-B/6035-E-B, its revised Bridge Funding Request.⁹

Energy Division's Disposition Letter regarding PG&E AL 4131-G-A/5614-E-A authorized PG&E's proposal that the 2021 ESA bridge funding be sourced from a mix of Unspent Funds from PYs 2017-2020, including PY2009-2016 unspent funds allocated to PY2017-2020, along with new revenue collection in the following order of priority:

⁹ PG&E Advice 4351-G-B/6035-E-B was approved by Energy Division in its January 27, 2021 Disposition Letter, effective December 24, 2020.

1. Unspent PY2017-2020 funds (including PY2009-2016 unspent funds that were allocated to PG&E's PY2017-2020 ESA Program through Advice Letter requests).¹⁰
2. New revenue collection.

Following the priority list above, PG&E is first spending its remaining unspent PY2017-2020 funds, including PY2009-2016 unspent funds that were allocated to PG&E's PY2017-2020 ESA Program. Approximately \$197.9 million gas and electric funds were unspent by December 31, 2020 as shown in Table 1 above, and new revenue collection for the January 1 – June 30, 2021 bridge period will not be required.

B. The proposed fund shift promotes efficient, cost effective, and effective ESA implementation.

Shifting funds from electric to gas ensures that sufficient gas funds are available for the remainder of the six-month bridge period. The proposed fund shift allows all PG&E income qualified customers to participate in ESA and receive measures for which they qualify, regardless of whether they are gas or electric customers. Without the gas funding, PG&E will need to turn away customers requiring gas measures.

C. Timeliness of PG&E's fund shift request.

PG&E has completed the full accounting of its 2020 year-end activities by closing out the program year and allowing all participating program contractors until the end of February 2021 to provide final invoices for work conducted in 2020. This reconciliation is the standard process followed every year for the ESA Program to close our year-end activity and this Advice Letter is filed as timely as possible, following the annual ESA close out.

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 April 22, 2021, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division

¹⁰ Conforming Advice Letter Final Resolution PGE G-3531 (December 14, 2017) or Mid-Cycle Advice Letter Non-Standard Disposition Letter PGE 3990-G_5329-E_3990-G-A_5329-EA_3990-G-B_5329-E-B (January 4, 2019).

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 General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, May 3, 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 A.19-11-003. 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

cc: Service List A.19-11-003



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) #: 4416-G/6149-E

Tier Designation: 2

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

Keywords (choose from CPUC listing):

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, as modified by D.10-10-008, D.16-11-022, and D.17-12-009

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: 5/3/21

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:

**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