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

Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6282E
As of June 7, 2022

Subject: Empower EV Pilot Program Implementation Plan

Division Assigned: Energy

Date Filed: 08-03-2021

Date to Calendar: 08-06-2021

Authorizing Documents: D1909006

Disposition:	**Withdrawn**
Effective Date:	**None**

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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

May 26, 2022

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

Subject: **Withdrawal of Advice Letter 6282-E, *Empower EV Pilot Program Implementation Plan***

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 August 3, 2021, PG&E submitted Advice Letter 6282-E, which is currently being reviewed by Commission staff. Per the request of CPUC, PG&E has elected to withdraw Advice Letter 6282-E and plans to submit a new advice letter to address minor updates to the Empower EV Pilot Program Implementation Plan.

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

Pacific Gas and Electric Company

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

August 3, 2021

Advice 6282-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: **Empower EV Pilot Program Implementation Plan**

Purpose

Pursuant to Ordering Paragraph 2 of Decision 19-09-006, Pacific Gas and Electric Company (PG&E) hereby submits its proposal to address the following Empower EV pilot program implementation details:

(1) The income verification process, including a comparison of the process to other electric vehicle programs;
(2) The guidelines for participation by tenants of rental properties for the Empower program;
(3) The program evaluation process, including a data collection plan and a preliminary format of the final program report;
(4) How the program will offer each participating customer assistance in determining the optimal rate for their home load profile; and
(5) How the data collection metrics, adopted in Ordering Paragraph 10, may be reported separately for a California Air Resources Board's Community Air Protection Program community, if such a community is selected.

Background

Empower EV was approved for implementation by the California Public Utilities Commission (CPUC) in September 2019 in Decision 19-09-006.[1] Empower EV focuses on supporting EV adoption with low-to-moderate income eligible customers by reducing three key barriers:

- Total cost of ownership;
- Lack of knowledge about EVs and their benefits; and

[1] California Public Utility Commission. (2019). Decision 19-09-006: DECISION APPROVING THE APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR THE EMPOWER ELECTRIC VEHICLE CHARGER INCENTIVE AND EDUCATION PROGRAM https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M314/K145/314145047.PDF

- Access to charging infrastructure.

Empower EV benefits include providing Eligible Customers up to $2,000 for charger installation and/or electric panel upgrades, completed by licensed electricians, and point-of-sale Level 1 or 2 charger cost coverage at no more than $500 per unit.

Income Verification Process

On May 5, 2021, GRID Alternatives (GRID) was selected as the third-party implementer for Empower EV. GRID will utilize the California Air Resources Board's (CARB) Access Clean California income verification process, detailed below, to ensure compliance with Empower EV's eligibility criterion that customers have incomes at or below 400% of the Federal Poverty Level (FPL), and to reduce application barriers to the maximum extent possible, including through categorical eligibility determinations. GRID will collect and assess the following documents to verify income for Empower EV:

- Applicants must submit a signed affidavit attesting to their household income AND must provide one of the following:
  - Applicants who file taxes will have their income confirmed by the tax transcript via IRS Form 4506-C, the Income Verification Express Service (IVES) Request for Transcript of Tax Return.
  - Applicants who do not file taxes must verify their income with either the most recent available IRS Form W-2, Wage and Tax Statement; or pay stubs or bank statements.
  - Categorial eligibility: Applicants who have provided validated income verification documentation for another program for the previous tax year showing income levels at or below 400% FPL are automatically deemed eligible until the next tax filing deadline. If income verification documentation is not for the previous tax year or the new tax filing deadline has passed, the applicant must provide updated documentation per the guidelines above. Otherwise applicants may provide additional categorical eligibility as provided on Page 2 of Required Income Document Guide[2] for the California Alternative Rates for Energy (CARE) Program.

Some of the specific details regarding how household size and income are calculated, and proven via processes described above, may change over time as CARB (and/or other agencies) update their policies and create an aligned income verification standard. The desired outcome is to ensure applicants do not have to follow different processes across these programs, so any updates will be in the spirit of standardization and coordination

[2] https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/EN_income_guide.pdf

with CARB's Access Clean California income verification process. Any such changes will be documented so that Applicants are aware of the most up-to-date process.

Guidelines for Renters

PG&E will use the following guidelines for participation by tenants of rental properties in the Empower EV program.

Renter Pathway 1: Applicants who are renters will be required to get formal, written pre-approval from the property owner to install a Level 2 charger. GRID will work with PG&E to create a pre-approval template document for renters to use with property owners.

Renter Pathway 2: For low-income renters who physically can't install a Level 2 charger or whose landlord has not provided permission, GRID will offer an alternative charging package that includes both a portable Level 1/Level 2 combination charger for those tenants who have access to a 240v outlet. This combination charger will remain with the tenant in the event they move to another residence.

Program Evaluation Process

Salesforce Customer Relationship Management (CRM)

GRID Alternatives plans to build on its existing Salesforce CRM infrastructure in coordination with its Operations and Clean Mobility teams (including the Access Clean California program) to collect applicant and project data. The Access Clean California CRM environment (also known as a Saleforce "instance") will be used to accept and process applications while GRID's project instance will be used to manage subcontractors and track installations. GRID will work with its Operations team, Clean Mobility team, and Salesforce developer to ensure proper communication between the platforms for efficiency and a cohesive project flow.

GRID will ensure that CRM fields are sufficient to develop reports for required reporting to PG&E. The data fields and reports will follow the requirements PG&E has set out for monthly and quarterly reporting. The fields shall include, or be functionally equivalent to, but not limited to:

- Customer name
- Customer PG&E Account Number and Service Account ID/Premise ID
- Project address (must match PG&E account address)
- EV make, model, year, purchased or leased, new or pre-owned
- EV Purchase Date
- Home owned or rented
- Race/Ethnicity

- Age
- Gender
- Nationality
- Languages Spoken
- Lead Source
- Household size
- Total Annual Income
- Income Verified Method
- Equipment Installed
- Equipment Cost
- Labor Cost
- Application Submission Date
- Application Approval Date
- (Last electrical upgrade- if requested)
- Customer Out of Pocket Cost
- Client survey fields as needed
- Sub-contractor
- Virtual Site Assessment Date
- Design Complete Date
- Building Permit Application date
- Building Permit Pulled date
- Building Permit Inspection Date
- Installation Date
- Application Submittal to Express Connections/Service Planning Date
- Service Planning Response Date
- Project Completion Date

Monthly and Quarterly Reporting
GRID will develop monthly and quarterly reporting templates to be agreed upon by PG&E in advance of the first report.

Scope of monthly reporting: GRID Alternatives will provide monthly reporting including:

- Monthly budget spend
- Total number of customers served
- Number of renters versus homeowners broken down by charger type

- Demographic information of participants (age, race/ethnicity, gender, nationality, language). Note: Demographic information will be provided at the discretion of the applicant.
- How customers learned about Empower EV
- At what point customers decided to enroll (before/after EV purchase)
- Vehicle purchase date
- Total amount of charger incentives issued
- Total amount of panel upgrade incentives issued
- Number of customers participating in EnelX financing
- Total number of chargers installed
- Average total out-of-pocket cost paid by customer on top of program incentive
- Average total cost for panel upgrades
- Average total cost for chargers
- Was electrical work outside/near the home needed prior to charger installation? What work (if known)?
- Type of electrical work performed at each household (installation and/or panel upgrade)
- Charger utilization, and data- aggregated customer load curves pending charger model, connectivity, and EVSE supplier data sharing
- Programmatic challenges and solutions, when applicable
- Why customers dropped from program participation, if known
- Additional information and metrics, to be mutually agreed upon by GRID and PG&E

Scope of quarterly reporting. GRID Alternatives will provide quarterly reporting including:

- Customer feedback received via email, phone, or through case managers
- Rate choice (collected during intake and again during Driver Behavior Survey)
- CBO participation and customer feedback
- Map of charger locations aggregated by census tract
- Outreach and/or translation services
- Customer participation in other CARB/ EV incentive programs
- Additional information and metrics, to be mutually agreed upon by GRID and PG&E

Final Evaluation Report

GRID will work in collaboration with PG&E to provide a final program evaluation report to be shared online and with other California investor- owned utilities for educational purposes. The preliminary format for the report is as follows:

- Executive Summary with key program metrics and top learnings
- Overview of program structure, goals, and implementation work
- Quantitative breakdown and analysis of core program metrics, including:
  - Geographical distribution of program funding
  - Distribution of utility rate schedule selection among participants
  - Selection of EV charging equipment, both in general and across participant types
  - Estimated charger utilization data and load profiles to be assessed in coordination with PG&E
  - Overall customer satisfaction data
  - Data on vehicle distribution: make/model/year, new vs. used, purchased vs. leased
  - Data on incentive stacking with CARB's EV incentive programs
- Qualitative Analysis of Implementation Strategy
  - Programmatic and operational challenges that were encountered and analysis of strategies used to address these challenges
  - Review of each CBO's involvement in the program, including customer feedback
  - Analysis of outreach strategies used to address and overcome barriers to equitable participation, such as linguistic barriers
- Key takeaways and learnings from quantitative and qualitative analysis to inform future efforts.

<u>Rate Guidance</u>

Both PG&E and GRID Alternatives will advise Applicants to use PG&E's EV Savings Calculator[3] to determine which rate will best fit their anticipated charging habits and choice of electric vehicle. PG&E's EV Savings Calculator is easy to use, accessible for all internet-based applicants, gives results quickly, and provides insights into optimal rates for EV drivers.. Rate selection will be tracked at both the beginning and the end of the program to determine which rate a customer is on and whether it has changed during their participation in the program.

[3] https://ev.pge.com/

Community Air Protection Program Reporting

Empower EV is open to all income qualified customers throughout PG&E's service area. Since there is no geographic limitation for program reporting, including for CARB's Community Air Protection Program communities, PG&E will not report its data collection metrics separately for these communities. PG&E's metrics will instead highlight significant program findings from throughout the service area, both in monthly data reports and in the final evaluation.

The 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, 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 August 23, 2021, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Sidney Bob Dietz II
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

PG&E requests that this Tier 2 advice submittal become effective on regular notice, September 2, 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. 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/

Sidney Bob Dietz II
Director, Regulatory Relations

California Public Utilities Commission

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:
- [x] 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) #: 6282-E

Tier Designation: 2

Subject of AL: Empower EV Pilot Program Implementation Plan

Keywords (choose from CPUC listing): Compilance

AL Type: [ ] Monthly [ ] Quarterly [ ] Annual [x] One-Time [ ] Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
D.19-09-006

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 [x] 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 [x] No

Requested effective date: 9/2/21

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 proposed[1]: N/A

Pending advice letters that revise the same tariff sheets: N/A

[1]Discuss in AL if more space is needed.

Clear Form

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: Sidney Bob Dietz II, 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
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