

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 18, 2022

Advice Letter 6381-E/4517-G, 6381-E/4517-G-A

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street
San Francisco, California 94177
E-mail: PGETariffs@pge.com

**SUBJECT: Joint Submittal regarding Small Business Customer Outreach
Pilot for Disadvantaged Communities**

Dear Mr. Dietz:

Advice Letter 6381-E/4517-G, 6381-E/4517-G-A is effective as of December 1, 2021.

Sincerely,

A handwritten signature in black ink that reads "Leuwam Tesfai".

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission

September 9, 2022

ADVICE 4620-E-A
(Southern California Edison Company - U 338-E)

ADVICE 6381-E-A/4517-G-A
(Pacific Gas and Electric Company - U 39-M)

ADVICE 5888-A
(Southern California Gas Company - U 904-G)

ADVICE 3884-E-A/3033-G-A
(San Diego Gas & Electric Company – U 902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Partial Supplement to Joint Submittal regarding Small Business
Customer Outreach Pilot for Disadvantaged Communities

Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCalGas), and San Diego Gas & Electric Company (SDG&E) (collectively, the “Utilities”) hereby submit to the California Public Utilities Commission (Commission or CPUC) this supplement to SCE Advice Letter (AL) 4620-E, PG&E Advice Letter 6381-E/4517-G, SoCalGas Advice Letter 5888, and SDG&E Advice Letter 3884-E/3033-G (collectively referred to as “Advice Letter 4620-E *et al*”).

PURPOSE

The purpose of this advice letter is to supplement the Utilities’ proposed implementation parameters for a Small Business Customer Outreach Pilot targeted at Small Business Customers in Disadvantaged Communities (DACs) (Pilot) by clarifying that Small Business Customers served by Community Choice Aggregators (CCAs) are eligible to participate in the Pilot, as well as proposing additional modifications to the proposed schedule. These updates are made in accordance with General Order (GO) 96-B,

General Rule 7.5.1, which authorizes utilities to make changes to an advice letter through the submittal of a supplemental advice letter. This advice letter supplements Advice Letter 4620-E *et al* in part as further discussed below.

BACKGROUND

On October 28, 2021, pursuant to Ordering Paragraph (OP) 9 of Decision (D.)21-06-036, the Utilities jointly submitted Advice Letter 4620-E *et al* seeking Commission approval of their proposal for a Small Business Customer Outreach Pilot for DACs, which provided the implementation parameters, cost recovery, and timeline for the Pilot.

On November 17, 2021, the California Community Choice Association (CalCCA) submitted a protest to Advice Letter 4620-E *et al*, claiming that the advice letter did not explicitly allow for participation of Small Business Customers that are served by CCAs in the Pilot and requested that the Utilities be required to explicitly allow participation in the Pilot of CCA Small Business Customers in DACs.

On November 24, 2021, the Utilities responded to CalCCA's protest in which the Utilities refuted CalCCA's claims and referenced several sections of the advice letter that included proposals for CCA participation in the Pilot.¹

After further review and consideration, the utilities have decided to supplement Advice Letter 4620-E *et al* to clarify that Small Business Customers served by CCAs are eligible to participate in this pilot.

DISCUSSION

The Utilities hereby supplement Advice 4620-E *et al* to modify *only* the following information in the Utilities' proposal for the Small Business Customer Outreach Pilot targeted at Small Business Customers in DACs. All other information submitted as part of the proposed Small Business Customer Outreach Pilot on October 28, 2021 remains unchanged. The Utilities look forward to continued collaboration with the CCAs on this Pilot.

1. Small Business Customers in DACs that are served by CCAs are eligible to participate in this Pilot

The Utilities propose to target Small Business Customers,² including those served by CCAs in the Utilities' service areas, that are located in a DAC, which the

¹ See The Joint Utilities' Reply to CalCCA's Protest of Joint Submittal regarding Small Business Customer Outreach Pilot for Disadvantaged Communities, at 2.

² Small Business Customers as defined by each utility's respective tariffs:

PG&E:

Electric: https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_RULES_1.pdf

Gas: https://www.pge.com/tariffs/assets/pdf/tariffbook/GAS_RULES_1.pdf

CPUC delineates through the use of the CalEnviroScreen from the California Office of Environmental Health Hazard Assessment.³ As of the filing of this supplemental advice letter, the approved CalEnviroScreen is version 4.0.⁴

2. Revise the proposed timeline for Utilities to begin pre-pilot activities and for the implementation of the Pilot based on the estimated AL approval date

As of September 8, 2022, Advice Letter 4620-E *et al* is pending disposition by Energy Division. As such, the Utilities propose revising the proposed timeline as outlined in Table 5 below. The Utilities also propose to extend the amount of time required for the Utilities to complete the pre-Pilot activities from two months to three months as this additional time is needed to adequately prepare for the Pilot implementation.

Table 5: Revised Proposed Timeline for Small Business Customer Outreach Pilot

Dates	Activity
October 28, 2021	Tier 2 AL is Filed
By December 31, 2021 <u>To be determined</u>	AL is approved
January 3, 2022 <u>Within 3 months from the AL approval date</u>	Utilities begin <u>complete</u> pre-pilot activities to: <ol style="list-style-type: none"> 1. Hire third-party implementer 2. Hire <u>Engage</u> third-party evaluator 3. Create customer outreach materials⁵ 4. Analyze customer energy usage to identify beneficial rates
March 1, 2022 – February 28, 2023 <u>Within 12 months after completion of pre-pilot activities</u>	Pilot Implementation
March 2023 – March 2024 <u>Within 12 months after completion of pilot implementation</u>	Post Pilot Assessment

SCE: https://library.sce.com/content/dam/sce-doclib/public/regulatory/tariff/electric/rules/ELECTRIC_RULES_1.pdf

SoCalGas: <https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/01.pdf>

SDG&E:

Electric: https://www.sdge.com/sites/default/files/elec_elec-rules_erule1.pdf

Gas: https://tariff.sdge.com/tm2/ssi/inc_gas_rules.html

³ Disadvantaged Communities as defined by the CPUC: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/disadvantaged-communities>

⁴ <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

⁵ CCAs that elect to have their programs included in the pilot should also create their own outreach materials.

Dates	Activity
March 2024—December 2024 <u>Within 9 months after completion of post pilot assessment</u>	Pilot Evaluation and Final Report

TIER DESIGNATION

Pursuant to GO 96-B, Energy Industry Rule 5.2, and D.21-06-036, the Utilities submit this advice letter with a Tier 2 designation, which is the same Tier designation as the original Advice Letter 4620-E *et al.*

EFFECTIVE DATE

This advice letter will become effective on December 1, 2021, the same day requested as the original Advice Letter 4620-E *et al.*

PROTESTS

The Utilities request that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest period and comment period designated in Advice Letter 4620-E *et al* and not reopen the protest period. This supplemental advice letter does not make substantive changes that would affect the overall evaluation of the advice letter.

NOTICE

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B, R.18-07-005 and R.21-02-014 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Diana Valle at (626) 302-5666 or by electronic mail at diana.valle@sce.com.

Southern California Edison Company

/s/ Connor Flanigan
Connor Flanigan

CF:dv:jm



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Darrah Morgan
 Phone #: (626) 302-2086
 E-mail: AdviceTariffManager@sce.com
 E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE
 ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4620-E-A et al.

Tier Designation: 2

Subject of AL:

Partial Supplement to Joint Submittal regarding Small Business Customer Outreach Pilot for Disadvantaged Communities

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 #: Decision 21-06-036

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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: 12/1/21

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Connor Flanigan
Title: Managing Director, State Regulatory Operations
Utility/Entity Name: Southern California Edison Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: AdviceTariffManager@sce.com

Contact Name: Tara S. Kaushik c/o Karyn Gansecki
Title: Managing Director, Regulatory Relations
Utility/Entity Name: Southern California Edison Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: karyn.gansecki@sce.com

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

**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.
Braun Blasing Smith Wynne, P.C.
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
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
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

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
McClintock IP
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.

Resource Innovations

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
Stoel Rives LLP

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