

## 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

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October 28, 2021

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

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

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

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

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

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

**PURPOSE**

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 Tier 2 Advice Letter (AL) pursuant to Ordering Paragraph (OP) 9 of Decision (D.)21-06-036. The purpose of this AL is to provide the implementation parameters, cost recovery and timeline for a Small Business Customer Outreach Pilot targeted at Small Business Customers in disadvantaged communities (DAC).

**BACKGROUND**

On February 17, 2021, the Commission issued Order Instituting Rulemaking (OIR) (R.) 21-02-014, which was designed to consider the establishment of special relief mechanisms for customers who were unable to pay their energy bills as a result of the COVID-19 pandemic. On June 30, 2021, the Commission issued D.21-06-036,

Decision Addressing Energy Utility Customer Bill Debt Via Automatic Enrollment in Long Term Payment Plans (Decision). OP 9 of the Decision ordered that the Utilities jointly submit a Tier 2 AL within 120 days of the issuance of June 30, 2021 Decision containing a pilot plan proposal for outreach and verbal counseling to Small Business Customers in DACs on appropriate programs, incentives, and rates available to help the customer lower their energy bills.

## **DISCUSSION**

### **A. Problem Statement, Pilot Objective, and Guiding Principles**

The Utilities recognize that there is unmet potential for Small Business Customers to realize energy bill savings by accessing different rates, programs, and incentives. Due to the COVID-19 pandemic, Small Businesses across the state have accumulated debt of over approximately \$140 million as of September 30, 2021.<sup>1</sup> Even prior to the pandemic, many Small Business Customers have traditionally struggled to realize bill savings opportunities due to, among other things, a lack of understanding of the best rate options or utility programs, lack of time and capital to invest, and/or lack of awareness to seek help from their respective energy utility.

The objective of the Small Business Customer Outreach Pilot is to reduce bill arrearages and drive persistent bill savings for Small Business Customers by providing one-on-one energy management coaching on how best to reduce existing bills and help customers navigate the utility's portfolio of rate options and programs. Through personal counseling by "Energy Ambassadors," participating Small Business Customers may identify no- and low-cost ways to save energy by participating in energy audits; be driven to choose the most economical rate plan for their specific needs, and participate in bill management, load shifting, and/or energy savings programs. The goal is to assist customers in achieving results in sustained bill savings after the counseling has concluded.

To meet this objective, the Utilities recommend the following guiding principles be used to frame the development of this pilot:

1. Target Small Business Customers most in need and those in DACs;
2. Complement, not duplicate existing programs;
3. Leverage existing infrastructure and resources where possible to drive cost-efficiencies;
4. Enable easy customer participation and cost-effective IOU administration;
5. Assist customers to identify savings opportunities that do not require significant investment of time or capital for participating customers; and

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<sup>1</sup> Estimated total statewide Small Business Customer arrears based on amounts included in automatically enrolled COVID-19 Small Business Relief Payment Plans and subject to change based on customer payments and/or opt-out of the payment plans.

6. Be designed in a way that enables evaluators and program administrators to glean useful insights, scale if cost-effective, and minimize cost shifts to non-participating customers.

## **B. Pilot Hypothesis**

- The Utilities propose the Small Business Outreach Pilot use a Randomized Control Trial (RCT)<sup>2</sup> to test for the following questions: Does the pilot result in participating customers repaying bill arrearages faster than control customers, both in terms of reducing the average dollars in arrears and the percentage of customers in arrears?
- Does engagement with Energy Ambassadors result in an increase in customer participation in pilot offerings (e.g., rates, demand side management programs) compared to control customers, which may result in longer term bill savings?
- How cost efficient is the use of third-party Energy Ambassadors as a means to engage Small Business Customers?
- Is the use of statewide third-party Energy Ambassadors effective, as measured by customer satisfaction with the experience?
- Can the pilot be scaled?

## **C. Customer Participation Criteria**

In adherence with the Decision, the Utilities propose to target Small Business Customers<sup>3</sup> that are located in a DAC, which the CPUC delineates through the use of the CalEnviroScreen from the California Office of Environmental Health Hazard

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<sup>2</sup> A RCT is an experimental form of impact evaluation design whereby customers will be randomly assigned to a treatment group (in this case participate in the pilot by being contacted by Energy Ambassadors), or to a control group. A key strength of an RCT design is that it provides a strong case for causality: to aid in knowing that what has been achieved is the direct result of the pilot intervention.

<sup>3</sup> 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](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](https://www.pge.com/tariffs/assets/pdf/tariffbook/GAS_RULES_1.pdf)

SCE: [https://library.sce.com/content/dam/sce-doclib/public/regulatory/tariff/electric/rules/ELECTRIC\\_RULES\\_1.pdf](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](https://www.sdge.com/sites/default/files/elec_elec-rules_erule1.pdf)

Gas: [https://tariff.sdge.com/tm2/ssi/inc\\_gas\\_rules.html](https://tariff.sdge.com/tm2/ssi/inc_gas_rules.html)

Assessment.<sup>4</sup> As of the filing of this advice letter, the approved CalEnviroScreen is version 3.0.<sup>5</sup>

Within these DACs, the Utilities propose to target Small Business Customers that have COVID-19 related arrearages and who were eligible for automatic enrollment in COVID-19 Small Business Relief Payment Plans as defined by tD.21-06-036.<sup>6</sup> This allows for targeting of the pilot to customers that have a demonstrated inability to keep current on their energy bills. At a high level, it also provides a preliminary indication that these customers may not be engaged with the utility's available offerings as the customer did not voluntarily enroll in a payment plan.

The Utilities recommend that a maximum of 9,550 Small Business Customers in DACs be included in the outreach for the pilot. As of September 30, 2021, the Utilities collectively had approximately 100,000 Small Business Customers eligible for automatic enrollment in the COVID-19 Small Business Relief Payment Plans. Of those 100,000 Small Business Customers, approximately 28,800 were located in DACs. The Utilities propose to target 9,550 (or 33 percent) of the Small Business Customers located in DAC that were automatically enrolled in payment plans for outreach by Energy Ambassadors. Specifically, PG&E would target 50 percent of its eligible Small Business Customers, whereas SCE and SoCalGas would target 25 percent of their Small Business Customers in DACs. Due to the limited number of Small Business Customers located in DACs, SDG&E would target all 800 of its eligible customers.<sup>7</sup>

**Table 1: Total Customers Proposed for Small Business Customer Outreach Pilot**

Utility	Approximate Number of Small Business Customers Automatically Enrolled in Payment Plans Territory-Wide <sup>8</sup>	Approximate Number of Small Business Customers in DAC Automatically Enrolled in Payment Plans	Proposed Maximum Number of Small Business Customers for Outreach Pilot
PG&E	27,000	7,000	3,500

<sup>4</sup> Disadvantaged Communities as defined by the CPUC: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/disadvantaged-communities>

<sup>5</sup> <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

<sup>6</sup> D.21-06-036, Appendix C

<sup>7</sup> Due to the number of SDG&E small business customers in DAC automatically enrolled in payment plans, SDG&E proposes to contact all as part of this pilot. Energy Ambassador interviews, participant surveys, and DSM program enrollment and arrearage rates pre- and post-pilot participation will be included for the SDG&E portion of the pilot, but the RCT design will not include SDG&E customers as more customers would be required to detect an impact.

<sup>8</sup> Number of Small Business Customers eligible for COVID-19 Small Business Relief Payment Plans as of September 30, 2021.

SCE	52,000 <sup>9</sup>	16,000	4,000
SoCalGas	12,000	5,000	1,250
SDG&E	9,000	800	800
Total for Utilities	100,000	28,800	9,550

#### D. Customer Intervention Strategies

The Utilities have identified four intervention strategies and corresponding tactics to meet the pilot's objective in achieving persistent bill savings for Small Business Customers. These four strategies are (1) data analytics on rate and energy action plans, (2) customized outreach and one-on-one coaching through Energy Ambassadors, (3) energy audits, and (4) post pilot energy assessments.

##### 1. Data Analytics on Rate and Energy Action Plans

Prior to the implementation of the pilot, the Utilities will identify customers with high untapped savings potential and in need of assistance by analyzing the customers enrolled in COVID-19 Small Business Relief Payment Plans. The analysis will also confirm if customers are already enrolled in applicable energy efficiency (EE), demand response (DR), and/or other applicable energy management programs, to eliminate presenting the customer with options in which they are already enrolled, and/or are mutually exclusive from the program(s) in which the customer is participating.

Leveraging insights from the data analysis, the Utilities will aim to determine the optimal rate that may be most beneficial to the customer. This analysis would allow for the potential to categorize customers and to inform them if specific rates are better suited (i.e., restaurants will generally save money by being on Rate A and dry cleaners will generally save money by being on Rate B). In addition, a customized energy action plan for each pilot participant can be created that would include outreach material with actionable information for the Small Business Customer to consider.

##### 2. Customized Outreach and One-on-One Energy Management Coaching through Energy Ambassadors

Energy Ambassadors would perform one-on-one energy management coaching initially through an alignment session to share the customized energy action plan and walk the customer through their utility's respective "MyAccount" platform where customers can

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<sup>9</sup> As SCE was granted an extension by the CPUC until October 29, 2021 to automatically enroll residential and Small Business Customers in their respective payment plans, this represents the number of Small Business Customers that were eligible for automatic enrollment rather than number enrolled.

view their specific usage data. Also included in the initial meeting, the Energy Ambassador would provide assistance in enrolling the customer in applicable EE, DR, energy management, and/or optimal rate offerings.

The coaching would continue for one year through quarterly progress reports and counseling sessions. The progress reports would feature business energy performance and personalized data changes such as bill and energy usage comparisons. In the quarterly sessions, the Energy Ambassador would walk through the progress reports and answer any questions that the customer may have regarding their bill or programs. The sessions will also allow the Energy Ambassadors to potentially identify any trends and make recommendations, address customer concerns, share feedback, and best practices. At the conclusion of the year, a final progress report would be created and provided to the Customer.

### 3. Energy Audits

During the initial meeting with the customer, the Energy Ambassadors would also be tasked with performing an on-site clipboard energy assessment to identify any further opportunities for bill and/or energy savings potential. This can be discussed with the customer to determine what low/no cost opportunities may exist and provide additional support if any applicable programs are identified. Depending on the needs of the customer, the Energy Ambassador can offer additional guidance and support during any equipment installation or project development.

### 4. Post Pilot Assessment

After the final progress report and one year of coaching has concluded, the Utilities intend to monitor the energy usage and arrearages for the pilot participants for an additional year. This would allow for insight into whether any bill savings persist moving forward and whether customers will continue to access Energy Management programs after the coaching has completed.

## **E. Energy Ambassadors and Customer Programs/Rates to be Offered**

The Utilities propose to hire and use a single statewide implementer for the pilot. The use of a statewide implementer would allow for customers across different utility service areas to receive consistent messaging from the Energy Ambassadors.<sup>10</sup> It would also allow for Energy Ambassadors to include any information on programs administered by the applicable Community Choice Aggregator (CCA) of which the Utilities are not aware. Each utility or CCA would be responsible for creating its own outreach materials and messaging, as well as providing that information to the statewide implementer for inclusion in the one-on-one counseling with the Small Business Customers. Each utility

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<sup>10</sup> There will be variations in exact offerings to customers depending on available IOU or CCA programs.

or CCA has the ability to define and provide guidance and training to the statewide implementer on marketing and communications administered with the Small Business Customers. Marketing and communications include all the messages, media, and activities used by each utility or CCA to communicate to the Small Business Customers to help inform them of available programs and encourage their participation in these programs.

Each utility should have oversight on how customer messaging is administered within their respective service territory. The third-party implementer must present relevant utility, CCA, and any applicable third-party offerings equally and not provide a recommendation for why a customer should select one over the other.

SDG&E will be the lead utility in contracting and coordinating with the statewide implementer for the pilot. To allow for flexibility in both pilot size for each utility and potential need to support service area differences between the Utilities (i.e., greater travel distance, additional complexity in programs or outreach, etc.), SDG&E will request that the statewide implementer bill each utility separately, which prevents the need for cofunding agreements between the Utilities for this pilot.

For SCE and SoCalGas, the two utilities plan to further coordinate and compare customers being targeted as there may be instances where a single Small Business Customer is targeted by both utilities. After the preliminary identification of any Small Business Customer that is targeted by both SCE and SoCalGas, the use of a single statewide implementer would allow for the customer to receive information for both SCE and SoCalGas simultaneously.

Consistent with the Utilities' guiding principles to complement existing programs, leverage existing infrastructure, and enable savings opportunities that do not require significant investment of time or capital on the part of participating customers, the Utilities propose that the pilot provide outreach to customers regarding the Utilities' EE, DR, energy programs, and portfolio of rate options as outlined in the table below. This approach is particularly important in light of the fact that about half of small businesses lease rather than own their business properties<sup>11</sup> and when customers do not own their premises they have less financial incentive to make large capital investments in efficiency. The list of programs is subject to change given the dynamic nature of the Utilities' demand-side management portfolios.

## **Table 2: List of Eligible Utility Programs and Rates**

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<sup>11</sup> August 2021 Survey of Small Businesses conducted by the National Federation of Small Businesses. See <https://www.nfib.com/content/press-release/coronavirus/almost-half-of-small-business-owners-surveyed-anticipate-needing-additional-financial-support-over-the-next-six-months/>

Utility	Energy Efficiency	Demand Response	Energy Management	Rates
PG&E	Staples Direct Install and Micro and Small Business Equity Program, On-Bill Financing	Emergency Load Reduction Program (ELRP), Capacity Bidding Program (CBP), Peak Day Pricing (PDP), Auto-Demand Response (Auto-DR)	My Account	B1, B6, B10, B19 with or without PDP, and EDR (If approved)
SCE	Third-Party Direct Install and On-Bill Financing Measures	Critical Peak Pricing (CPP), Summer Discount Plan (SDP), Capacity Bidding Program (CBP), Demand Response Auction Mechanism (DRAM), Automated-Demand Response (Auto-DR)	SCE Energy Manager, My Account	TOU-GS-1, TOU-EV-7, WTR, RTP
SoCalGas <sup>12</sup>	Small Commercial Direct Install Program, Commercial Deemed Rebate Program, Commercial Custom Incentive Program, Midstream Water Heating Program, Point of Sale Foodservice Program, On-Bill Financing Program, Nonresidential Energy Advisor Program	Not Applicable	My Account	G-10

<sup>12</sup> As a natural gas utility, SoCalGas does not have any Demand Response programs nor any TOU rates.

SDG&E	Small Commercial Business Program (SCP) On-Bill Financing	AC Saver, Base Interruptible program (BIP), Capacity Bidding Program (CBP), Technology Deployment (TD)	My Account	TOU-A, TOU-A2 TOU-A3, AL-TOU, AL-TOU2, GN-3, DG-R
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The Utilities are engaged into soliciting for third-party implementers to offer EE measures. These third-party implementers are responsible for both the design and delivery of EE offerings. Due to the varying status of each IOU's EE solicitations, the available offers may be subject to change as the Utilities continue to contract with additional third-party implementers. Consistent with the guiding principle to limit upfront costs for the customer, the intent is to focus on EE measures that are either direct install or measures coupled with on-bill financing.

In addition to the Utilities' programs, any CCA would be welcome to also provide their own respective programs as offerings so that the customer is provided with a full view of all applicable programs. The CCA would be responsible for creating their own outreach materials for their own programs and for training the Energy Ambassadors on any specific nuances.

**F. Proposed Budget and Cost Recovery**

The Utilities provide below the estimated costs for the statewide pilot, with costs ranging over a 2-year period between \$10.7 to \$16.1 million combined for the Utilities. These costs are estimates only and may vary as the pilot is implemented. For example, once the Utilities have contracted with the statewide implementer, there will be a better understanding of the actual implementation, marketing and outreach costs.

Table 5 below shows the high level breakdown of the proposed budget for the pilot. Administrative costs are inclusive of utility program management and third-party vendor support, creation of marketing and outreach materials, reporting, and any costs associated with the solicitation for the third-party implementer or evaluator. This also includes any technical assistance for the third-parties and ongoing training should any new programs be included in the pilot. The Utilities preliminarily estimate that each Small Business Customer will cost \$1,000 for the third-party implementer to provide the coaching, energy action plan, and assistance with the implementation of any customer requested changes. As previously stated, this is subject to change based on the actual solicitation. Because of this potential for changes, the Utilities have estimated the budget using a range of plus-minus 20 percent.

**Table 5: Pilot Budget (in thousands)**

	<b>PG&amp;E</b>	<b>SCE</b>	<b>SoCalGas</b>	<b>SDG&amp;E</b>
Administrative	\$960 to \$1,440	\$960 to \$1,440	\$584 to \$876	\$416 to \$624
Third-Party Implementer	\$2,800 to \$4,200	\$3,200 to \$4,800	\$1,000 to \$1,500	\$640 to \$960
Third-Party Evaluation, Measurement, and Verification	\$160 to \$240 for all Utilities combined			
Estimated Total for Pilot	<b>\$10,720 to \$16,080 for all Utilities</b>			

With this being a first of its kind pilot targeting Small Business Customers, the Utilities are unsure how many customers contacted by the Energy Ambassadors may ultimately agree to participate and continue engaging through the full duration for the pilot. While the Utilities recognize that not all customers targeted may agree to participate, the intent is to be as transparent regarding potential costs associated with the pilot. As the IOUs will track all pilot-related costs in their existing COVID-19 Pandemic Protection Memorandum Accounts (CPPMA)<sup>13</sup> authorized by the Commission in Resolution M-4842. These costs will be subject to Commission review applicable to such memorandum accounts in accordance with Commission Resolution E-3238 and Section 454.9 of the California Public Utilities Code.<sup>14</sup>

### **G. Metrics and Evaluation**

<sup>13</sup> If applicable, the Utilities will submit a subsequent advice letter to modify CPPMA, to record the pilot-related costs approved in this advice letter.

<sup>14</sup> D.21-06-036, OP 7.

The Utilities propose to leverage an experimental design<sup>15</sup> to evaluate the success of the pilot. The Utilities plan to engage a statewide evaluation, measurement and verification (EM&V) consultant to support the process design and evaluation process. PG&E will be the lead utility in contracting and coordinating with the EM&V consultant. The full evaluation plan will be developed following CPUC approval of this Advice Letter.<sup>16</sup> PG&E and the EM&V consultant will share the proposed evaluation plan with CPUC staff and stakeholders for feedback prior to being finalized.

While the metrics will be solidified as part of the final evaluation plan, the Utilities propose the following outcomes and metrics to support the evaluation of the pilot's success. Finally, as the evaluation is expected to be performed by a single third-party evaluator for all, the Utilities propose to split the costs through a cofund for the evaluator based on each utility's respective proposed pilot size as reflected in Table 1.

### 1. Proposed Outcomes/Metrics

Eligible customers will be randomly assigned to either treatment or control conditions, with the number assigned to treatment proposed in the rightmost column in Table 1. For both treatment and control conditions, customers will be representative by IOU, industry, energy usage and arrearage quartiles (ranging from lowest to highest in dollar amount of arrearage). Following one year of participation, pilot effectiveness will be assessed on the following dimensions. Based on these outcomes, the evaluation report will make recommendations with respect to whether the pilot should be scaled and, if so, what changes to the intervention and evaluations design might improve it. The proposed outcomes and metrics are as follows:

- **Reductions in customer arrearages.** Reductions will be assessed by comparing participants to controls as measured by the:
  - average dollar reduction (by arrearage quartile)
  - average percentage reduction (by arrearage quartile)
  - number of customers no longer in arrears after one year of participation
- **Uptake of Pilot Offerings.** Success will be explored by comparing the relative frequency of participation in the various offerings (e.g., Demand Side Management (DSM) programs, rates) between treatment and control conditions. Relative rates of participation between treatment and control conditions in DSM

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<sup>15</sup> Specifically, the Utilities propose the use of a RCT design whereby customers will be randomly assigned to be contacted for outreach (treatment group), or to a control group. The RCT will be designed so that the treatment and control groups will be roughly equivalent in terms of business segments, energy use, and arrearage amounts. SDG&E will be excluded from the RCT due to there being an insufficient number of eligible customers in DAC to facilitate the statistical analysis required for this methodology.

<sup>16</sup> The Utilities anticipate that the evaluation will include Energy Ambassador interviews, participant satisfaction surveys, and analysis of changes in the rates of arrearages, participation in DSM programs and other offerings pre- vs. post-pilot participation.

programs may be indicative of Energy Ambassadors' potential for bringing about longer-term reductions in energy use.

- **Satisfaction with the Pilot.** Participant satisfaction with the pilot offerings and their experiences interacting with the Energy Ambassadors will be assessed by the administration of a survey.

## H. External Stakeholder Feedback

As the Small Business Utility Advocates' (SBUA) originally identified the gap in resources to help Small Business Customers,<sup>17</sup> the Utilities met with SBUA representatives on July 22, 2021 to confirm understanding of what SBUA had envisioned in its comments. The Utilities met again with SBUA on August 20, 2021 to provide a draft proposal based on feedback from the initial meeting. On September 28, 2021, the Utilities hosted a public workshop<sup>18</sup> to solicit feedback from interested stakeholders on the draft pilot proposal. During the workshop, the Utilities received comments from interested stakeholders<sup>19</sup> and also received written comments from the California Community Choice Association (CalCCA) on October 5, 2021. The Utilities have addressed each of the comments in the table below and incorporated the relevant comments into their proposed pilot.

**Table 4: External Stakeholder Comments and Utilities Response**

<b>Stakeholder Recommendation / Question</b>	<b>Utilities Response</b>	<b>Draft Proposal Section (if applicable)</b>
SBUA: include cost / square foot as a metric for the pilot	The Utilities intend to track overall changes to customer bills. Creation of a metric based on square foot may cause for data inconsistencies as Utilities may not always have data regarding square footage of a specific location and may not have equivalent data for the control group customers. In addition, Small Business Customers may combine multiple locations into a single bill, which would create additional	Not Applicable

<sup>17</sup> D.21-06-036, p. 39.

<sup>18</sup> Invitation to the workshop was sent via email to the Service List for R.21-02-014 on September 17, 2021.

<sup>19</sup> The Utilities received feedback from SBUA, Pioneer Community Energy, CalCCA, and the Public Advocates Office (Public Advocates).

<b>Stakeholder Recommendation / Question</b>	<b>Utilities Response</b>	<b>Draft Proposal Section (if applicable)</b>
	difficulties in use of a metric based on square foot.	
SBUA: will timing of COVID-19 impact meeting with customers?	The Utilities intend to comply with all applicable health and safety guidelines and laws in place.	Not Applicable
Pioneer Community Energy and CalCCA: pilot eligibility should expand beyond the CalEnviroScreen definition to include Small Business Customers with the highest rates of arrearages over the past 12-months as designated by the IOUs and CCAs	For simplicity in starting the pilot, the Utilities recommend the use of the CPUC approved definition of DAC and use of the CalEnviroScreen. Given the short time allocated for starting the pilot and need to perform analysis on specific customers prior to implementation of the pilot, redefining which customers should be eligible would delay the start of the pilot.	Not Applicable
CalCCA: CCA programs should be incorporated into the Small Business Outreach Pilot	The statewide third party implementer will provide recommendations on CCA programs as applicable. The CCAs would be responsible for providing the relevant information to the statewide third party implementer.	See Section E.
CalCCA: where will cost recovery for the pilot be?	D.21-06-036 allows the Utilities “track costs in their existing COVID-19 Pandemic Protection Memorandum Accounts.” <sup>20</sup>	See Section F.
CalCCA: provide estimated size and cost information to stakeholders	The Utilities have included this information as part of the pilot scope.	See Section C Table 1, and Section F
CalCCA: pilot outreach should only be conducted by third-party Energy Ambassadors with equal	The Utilities intend to hire a statewide third party implemeter to serve as Energy Ambassadors.	See Section E.

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<sup>20</sup> D.21-06-036, OP 7.

<b>Stakeholder Recommendation / Question</b>	<b>Utilities Response</b>	<b>Draft Proposal Section (if applicable)</b>
knowledge of IOU and CCA programs benefitting Small Business Customers		
Public Advocates: provide a list of applicable bill rates and programs	The Utilities have provided a preliminary list of applicable rates and programs. This list is subject to change due to ongoing solicitations and the evolution of the Utilities' demand-side management portfolios. Additionally, this list does not include CCA programs.	See Section E Table 2

## I. Proposed Timeline

Based on the timeline below, the Utilities recommend the start of the Small Business Customer Outreach Pilot to be 60 days after the approval of this AL, but no sooner than March 1, 2022. The 60 days are necessary for the Utilities to (1) hire a third-party Statewide Implementer to be the utility Energy Ambassadors, (2) hire a third-party evaluator for the pilot, (3) create outreach materials for the Energy Ambassadors, and (4) perform analysis on the energy usage for the targeted Small Business Customers to determine what rates may be most beneficial to the customer.

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

<b>Dates</b>	<b>Activity</b>
October 28, 2021	Tier 2 AL is Filed
By December 31, 2021	AL is approved
January 3, 2022	Utilities begin pre-pilot activities to: 1. Hire third-party implementer 2. Hire third-party evaluator 3. Create customer outreach materials <sup>21</sup> 4. Analyze customer energy usage to identify beneficial rates
March 1, 2022 – February 28, 2023	Pilot Implementation

<sup>21</sup> CCAs that elect to have their programs included in the pilot should also create their own outreach materials.

<b>Dates</b>	<b>Activity</b>
March 2023 – March 2024	Post Pilot Assessment
March 2024 – December 2024	Pilot Evaluation and Final Report

### **TIER DESIGNATION**

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, And D.21-06-036, the Utilities submit this advice letter with a Tier 2 designation.

### **EFFECTIVE DATE**

This advice letter will become effective on December 1, 2021, the 34<sup>th</sup> calendar day after the date submitted.

### **NOTICE**

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice letter. Protests should be submitted to:

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102  
E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

## For SCE:

Shinjini C. Menon  
Managing Director, State Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
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Telephone: (626) 302-3377  
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E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

## For PG&amp;E:

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, CA 94177  
Facsimile No.: (415) 973-3582  
E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

For SoCalGas:

Attn: Ray B. Ortiz  
Tariff Manager – GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No.: (213) 244-4957  
E-mail: [ROrtiz@socalgas.com](mailto:ROrtiz@socalgas.com)  
E-mail: [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

For SDG&E:

Greg Anderson  
Regulatory Tariff Manager  
San Diego Gas & Electric Company  
8330 Century Park Court  
San Diego, CA 92123  
E-mail: [GAnderson@sdge.com](mailto:GAnderson@sdge.com)  
Email: [SDGETariffs@sdge.com](mailto:SDGETariffs@sdge.com)

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

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 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](mailto: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](mailto: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 Eric Lee at (626) 302-0674 or by electronic mail at [eric.lee@sce.com](mailto:eric.lee@sce.com).

**Southern California Edison Company**

/s/ Shinjini C. Menon  
Shinjini C. Menon

SCM:el: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 et al

Tier Designation: 2

Subject of AL:

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 proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets: None

<sup>1</sup>Discuss 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](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Shinjini C. Menon  
Title: Managing Director, State Regulatory Operations  
Utility Name: Southern California Edison Company  
Address: 8631 Rush Street  
City: Rosemead  
State: California Zip: 91770  
Telephone (xxx) xxx-xxxx: (626) 302-3377  
Facsimile (xxx) xxx-xxxx: (626) 302-6396  
Email: [advicetariffmanager@sce.com](mailto:advicetariffmanager@sce.com)

Name: Tara S. Kaushik c/o Karyn Gansecki  
Title: Managing Director, Regulatory Relations  
Utility Name: Southern California Edison Company  
Address: 601 Van Ness Avenue, Suite 2030  
City: San Francisco  
State: California Zip: 94102  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx: (415) 929-5544  
Email: [karyn.gansecki@sce.com](mailto:karyn.gansecki@sce.com)

## 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.  
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

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  
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.  
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