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

Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4520G/6388E
As of December 1, 2021

Subject: Joint Investor-Owned Utilities Advice Letter Pursuant to Decision 21-06-015 for the Clean Energy Programs Workshop

Division Assigned: Energy

Date Filed: 11-01-2021

Date to Calendar: 11-03-2021

Authorizing Documents: D2106015

Disposition:	**Accepted**
Effective Date:	**11-01-2021**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Sidney Bob Dietz

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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL® Company

Shinjini C. Menon
Managing Director, State Regulatory Operations

November 1, 2021

ADVICE 4624-E
(Southern California Edison - U 338-E)

ADVICE 3882-E/3030-G
(San Diego Gas & Electric - U 902-M)

ADVICE 5894-G
(Southern California Gas Company – U 904 G)

ADVICE 4520-G/6388-E
(Pacific Gas and Electric Company – U39 M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Joint Investor-Owned Utilities Advice Letter Pursuant to Decision 21-06-015 for the Clean Energy Programs Workshop

PURPOSE

In accordance with Decision (D.) 21-06-015, Ordering Paragraph (OP) 44, Southern California Edison Company (SCE),[1] San Diego Gas & Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), and Southern California Gas Company (SoCalGas), (collectively, the Joint investor-owned utilities (IOUs)) hereby jointly submit to the California Public Utilities Commission (Commission or CPUC) this Tier 1 Advice Letter (AL) summarizing the Clean Energy Programs Workshop discussion and plan including schedule, metrics and reporting, and future considerations. The workshop summary is enclosed in Attachment A. The plan detailing how the Joint IOUs will increase and improve referral, leveraging, and coordination efforts across low income and clean energy programs among other details is enclosed in Attachment B. The

[1] Pursuant to Rule 1.8(d) of the Commission's Rules of Practice and Procedure, SCE is authorized to submit this joint advice letter on behalf of the IOUs.

P.O. Box 800 8631 Rush Street Rosemead, California 91770 (626) 302-3377 Fax (626) 302-6396

stakeholder comments that were received on October 7, 2021 are enclosed in Attachment C herein.

BACKGROUND

On June 7, 2021, the Commission issued D.21-06-015 (Decision) approving the IOUs' California Alternate Rates for Energy (CARE), Energy Savings Assistance (ESA), and Family Electric Rate Assistance (FERA) program applications for program years 2021-2026.

Per OP 44 of the Decision, the IOUs are to provide a summary of the workshop's discussion, including a plan for how the IOUs will increase and improve referral, leveraging, and coordination efforts, a proposed schedule across the program cycle, new metrics and reporting templates to be used in the monthly and annual reports, and other future considerations to be incorporated into the mid-cycle process.[2]

WORKSHOP SUMMARY

The workshop summary includes detailed discussion regarding the workshop that was attended by approximately 160 participants that included panelists of various program and community professionals, regulators and contractors, along with program administration and implementation staff. Four discussion groups were organized to address specific areas of feedback interests.

TIER DESIGNATION

Pursuant to OP 44 of D.21-06-015, this AL is submitted with a Tier 1 designation.

EFFECTIVE DATE

This AL will become effective on November 1, 2021, the same date as submitted.

PROTEST

Anyone wishing to protest this AL may do so electronically, and protests 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

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

[2] D.21-06-015, p.480.

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
Rosemead, California 91770
Telephone (626) 302-3377
Facsimile: (626) 302-9645
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For SDG&E:

Attn: Greg Anderson
Regulatory Tariff Manager
E-Mail: GAnderson@sdge.com & SDGETariffs@sdge.com

For PG&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, California 94177
Facsimile: (415) 973-3582
E-mail: 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
E-mail: Tariffs@socalgas.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.

NOTICE

In accordance with General Rule 4 of General Order (GO) 96-B, SCE is serving copies of this AL to the interested parties shown on the attached GO 96-B, A.14-11-007 et al, and A.19-11-003 et al 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) 302-3719. 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 AL 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 Joni Key or by electronic mail at joni.key@sce.com.

Southern California Edison Company

/s/ Shinjini C. Menon
Shinjini C. Menon

SCM:jk:cm
Enclosures

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) #: 4624-E et al.

Tier Designation: 1

Subject of AL: Joint Investor-Owned Utilities Advice Letter Pursuant to Decision 21-06-015 for the Clean Energy Programs Workshop

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 21-06-015

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: 11/1/21

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[1]:

Pending advice letters that revise the same tariff sheets: None

[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: 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

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
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Facsimile (xxx) xxx-xxxx: (415) 929-5544
Email: karyn.gansecki@sce.com

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
Curtailable 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	

Clear Form

ATTACHMENT A

ATTACHMENT A
Workshop Summary Report
ESA, Clean Energy and Low-Income Workshop
September 30, 2021
9am – 12:15pm

I. Executive Summary

The Energy Savings Assistance (ESA), Clean Energy, and Low-Income program administration workshop was held on September 30, 2021. The purpose of the workshop was for the low income and/or clean energy program administrators (PAs) for ESA, California Alternative Rates for Energy (CARE), Family Electric Rate Assistance (FERA), Self-Generation Incentive Program (SGIP), Solar on Multifamily Affordable Housing (SOMAH), Arrearage Management Plan (AMP), Percentage of Income Payment Plan (PIPP), Community Services & Development (CSD) Low income assistance programs, and disadvantaged community (DAC) programs to discuss better alignment for customer eligibility, increased referrals, and enrollment across programs, and increased coordination efforts. The workshop enabled participants from a variety of backgrounds to discuss a wide range of issues that included data sharing, cost sharing, joint enrollment and/or other joint agreements and/or Memorandums of Understanding (MOUs) between PAs. The peak attendance was 160 participants representing a diverse group of stakeholders, many with decades of experience in interacting with low-income programs and communities.

A range of points emerged from the discussion groups, which are described below under each key topic.

Additionally, the joint IOUs discussed several practical proposals which can be implemented over time to build on the work started in the workshop and to maintain progress toward a more customer-centric collaboration across programs. The proposals are grouped under short-, mid-, and longer-term actions which the IOUs believe will begin to improve alignment for customer eligibility, increased referrals and enrollment across programs, and increased coordination efforts across programs. The detailed discussion of each is included in Attachment B.

	Proposed Joint-IOU Collaration Activity Schedule									
	Short-Term				Mid-Term			Long-Term		
Activity	Q1-2022	Q2-2022	Q3-2022	Q4-2022	Q1-2023	Q2-2023	Q3-2023	PY2024	PY2025	PY2026
Low-Income Cross-Program Referral Process Template										
Cross Program Data Application/Form Sharing Clause										
Joint PA Collaboration/Leveraging Workshops										
Evaluate &/or Adopt Categorical Eligibility Study Results										
Evaluate &/or Adopt SJV Pilot Best Practices										
Future Consideration Policy Resolutions										

Note: This schedule is estimated and subject to adjustment.

II. Summary of Workshop Discussion

A. Opening Statements

The meeting started promptly, and stakeholders received a welcome, overview of the meeting mechanics, a safety moment, and an overview of the agenda. Commissioner Shiroma, the Lead Commissioner for the CARE, FERA, and ESA proceeding, focused on the importance of an integrated approach to meet low-income needs. She emphasized the need to coordinate with other low income and clean energy programs. Additionally, the Commissioner reiterated and encouraged workshop participants to "think outside the box" about how to build synergies in support of Californians with the greatest need of saving money and reducing a carbon footprint. The Commissioner shared that the Commission recently authorized $11 billion statewide for 2021-2026 for the IOUs low-income programs and as part of that Decision (D.) 21-06-015 (Decision or Low-Income Decision) identified the need for increased coordination with other programs such as the SGIP, SOMAH, AMP, PIPP, Affordable Broadband, CSD programs, and other energy and community programs. She also highlighted the need to ensure customers particularly in hard-to-reach, rural, and tribal communities be able to participate through design and to support bill reduction. The Commissioner then identified the Energy Division (ED) pilot in the Low-Income Decision as receiving $104 million to develop deeper energy savings and a hassle-free, easier pilot to navigate. She stated that it is important that the programs simplify the process to help customers understand how to apply, explain the fine print, provide access to the programs and to remove barriers whether it be program administration, data sharing, cost sharing, etc., and thanked stakeholders for participating.

B. Importance, Objectives & Outcomes

The meeting host kicked off the first half of the workshop with sharing the importance of the workshop to the IOUs and conveying that cross-program coordination is the key to success in providing the most benefit to address those customers in need, and emphasizing it is only through coordination and partnerships with stakeholders that the IOUs will be successful. The workshop allowed PAs and stakeholders to identify and discuss continuous improvement efforts that directly benefit all customers. The objectives of the workshop were identified as:

- Strong stakeholder participation with solutions-focused discussions. Recognizing barriers exist between programs, the primary focus should be on new efforts to increase program collaboration and prioritize solutions; and
- Inclusive discussion with all low-income and clean energy programs at a minimum: ESA, CARE, FERA, SGIP, SOMAH, AMP, PIPP, CSD Low Income assistance programs, and DAC programs.

The goal of the meeting was to leave with a better understanding of how various low-income, affordable broadband, lifeline and clean energy programs can better align, including at a minimum: data sharing, cost sharing, joint enrollment, and/or other joint agreements or MOUs between PAs.

C. Panelist Perspectives

Panelists shared different perspectives of current low-income and clean energy programs including a succinct overview of various programs and/or functions, areas of potential barriers, and potential solutions,

- **DAC-SASH/SOMAH**

Chris Walker representing Grid Alternatives (GRID) for the Disadvantaged Community Solar on Affordable Single Housing (DAC-SASH) program and as Co-Implementer of the SOMAH program started by explaining GRID's openness to forging partnerships with the CPUC, utilities, and others. Chris shared the important mission of GRID, which is transitioning to a clean energy future for all and the importance of supporting community-powered solutions through environmental justice.

For DAC-SASH, good alignment exists with CARE participation, especially in DACs that the program is focused on serving. However, increased alignment between DAC-SASH and ESA is needed. Leads from the IOUs are helpful, and the IOUs have provided GRID with 25,000 leads. Nevertheless, improving the referral process between the administrators could lead to more ESA participation. Mr. Walker's recommendation was to add a new metric with the number of clients referred between DAC-SASH and ESA with enrollment percentages between program referrals. Co-branding of marketing materials through emails and other opportunities is important between administrators to ensure the customer becomes comfortable with program administrator recognition and that the program is real and will benefit the participant. For DAC-SASH, the year 2022 will be a timeframe of opportunity for cross-program planning with GRID, especially in marketing and outreach (M&O), demonstrating that programs are real despite their low cost or no cost nature, an explanation of how the programs work, and an explanation of how the programs lead to improved utility rates for participants. In terms of eligibility alignment and coordination, the Access Clean California model is a good example of an eligibility engine and benefits finder for customers. Currently, the model is primarily for Electric Vehicle (EV) rates but is being built-out to include more offerings in support of "Energy for All." A statewide database is a real opportunity that would be helpful and is supported but would be a heavy lift. With regard to data that is accessible to GRID, GRID explained that useful data can be difficult to obtain because the data is not shared real-time and may be only provided a couple times a year. A further exploration of the challenges to enabling data exchange between the IOUs and third parties should be considered.

For SOMAH, GRID is one of several partners running the program. The program is focused on five (5) tenant units or more and must meet certain deed restriction requirements for affordable housing and/or income qualifications or location in a DAC. The SOMAH program uses 60 percent of Area Median Income (AMI) for its income eligibility. The program contains an Energy Efficiency (EE) Compliance Milestone for appropriate system sizing that includes either: (1) a whole building walkthrough equivalent to an American Society of Heating Refrigeration and Air conditioning Engineers (ASHRAE) level 1 or (2) a recent active participant in the building upgrade program. He explained that the program aligns best with the Low-Income Weatherization Program (LIWP) administered by CSD and the Energy Upgrade California program run by Bay Area Regional Energy Network (REN) and SoCal REN programs. The SOMAH program uses a system sizing tool that determines the maximum incentive a participant can receive. Educational materials, especially in how utility bill changes occur from participation in the program and including IOU contact information is important. Data sharing is offered or provided but only annually. CARE/FERA are great drivers in making the bill go further, but it is not an explicit requirement for SOMAH. Because SOMAH results in up to a $36 monthly savings, when coupled with CARE/FERA, the savings can be monumental. Pairing challenges between SOMAH and the SGIP were identified especially resulting from the CPUC D.21-06-03 and further clarity is needed to ensure SGIP storage could be more readily incorporated in conjunction with SOMAH projects. Those wanting more information about the program specifics, were referred to the monthly reports.

- **SGIP**

Brian Bishop of PG&E provided the presentation on the SGIP. There are three tenets of the program: (1) environmental goals, (2) grid support in reducing peak demand, and (3) market transformation for new technologies. For the details of the Equity Budget in SGIP please see CPUC D.17-10-004 and D.20-01-021. The Equity Budget offers incentives at $.085/Wh while the SGIP Equity Resiliency Budget offers $1/Wh. These incentive levels were set intentionally high to offset most or all project costs to generally reduce fossil fuel generation in Disadvantaged Communities (DACs). The dynamic nature of the SGIP budget is a potential barrier to program coordination. In particular, the SGIP budget can change rapidly from having funds available to being fully subscribed and then back to funds being available after dropouts occur, making it unclear whether funding is available. This can also be challenging for program alignment. Offering a program to customers that may not have funding available could lead to customer dissatisfaction. The complexity of the SGIP is often criticized as the rules have changed many times over the years, making the program hard to explain and understand which in turns creates a participant barrier. To some extent the complexity of the program and its relationship to other programs necessitates deeper levels of coordination and dialogue to overcome the programs dynamic budget and complex rule-driven process. One area of potential future exploration is to develop a more detailed break out of how the Equity Budget and Equity Budget and Equity Resiliency Budgets are reaching the low-income community. Nevertheless, SGIP's eligibility criteria seeks to assure the appropriate customers are receiving the funds. The SGIP program is a “first come, first serve” program that also uses a waitlist for backlogged customers that will be placed in line for incentives.

- **ESA**

Irma DePratti from SDG&E described the IOUs current data sharing efforts with CSD and water agencies through Memorandums of Understanding (MOUs). ESA also shares data bi-directionally with DAC-SASH and SOMAH. The numbers of leads from DAC-SASH and SOMAH to the IOUs has varied among utilities and results of the leads provided to DAC-SASH need to be better understood. Some of the challenges with data sharing efforts have included differences in the alignment of program qualifications. For example, the SASH program previously used AMI, making it difficult to align with ESA household income criteria at 200% of Federal Poverty Level (FPL). More recently, DAC-SASH is aligned with CARE and FERA guidelines, potentially improving the success rate of program leveraging. New legislation was passed into law that will increase the ESA eligibility to 250% of FPL which will create greater alignment with FERA and will become effective July 1, 2022. Additional challenges and barriers have included conflicting priorities, lack of knowledge transfer which comes from new employees onboarding without enough information on data sharing efforts, low enrollment rates for data sharing, and funding levels. These challenges and barriers impact the success of data sharing efforts because less priority is given to efforts that are not seen as successful. Developing strong policies and procedures helps ensure the smooth and timely transfer of data, as well as more successful outcomes from data sharing efforts. Potential solutions include more frequent communications and collaboration. Developing a meeting cadence between PAs can help identify challenges earlier in the process and establish timely solutions. Additionally, a collaborative single point of contact (SPOC) process is needed to facilitate a more complete list of programs and offerings provided to participants. The PAs can learn a lot from each other just by meeting together more often. Additionally, the implementation of Universal Application System (UAS) and the Multifamily (MF) Central Portal will allow for more collaboration between programs and will support additional solutions in removing inter-program barriers.

- **Cross Program Application and Coordination Process**

Austin Myatt from Robert Health & Associates (RHA) presented a broader view of coordination across programs and applications. The application process for some programs has had challenges, but when done right it can be a success and lead to increased customer trust and engagement. Low-income customers can often be overwhelmed and do not have the time to read and fill out multiple applications for individual programs. The primary challenges appear to be around data requirements, home requirements, and data sharing and security. For many programs one of the challenges can also be coordination and scheduling different types of workers needed to complete a job. For example, one program may require an electrical contractor, while another requires a water or plumbing contractors, realistically making it difficult to reduce customer visits. While the UAS is a great start, it needs to be done in a way that allows for similar requirements and data to be captured and tracked across programs. The information needs to be collected in a way that customer needs are identified prior to the first visit so that the PAs or implementers can ascertain how to best serve customers. Additionally, it may make more sense to serve customers beginning with the least costly program options and stepping up to more costly program options. Moreover, the UAS should include a simple comparison tool that shows all the programs a customer is eligible for, compares benefits, and allows for real time application submittal. Ideally, customers could sign up for all public assistance programs at the same time and collect the same information once. With a centralized database, all programs can be communicated to the customer at one time. Ideally, there would be one program application across programs, resulting in a huge benefit for applicants and contractors. Further steps need to be explored and accomplished to reduce barriers. For example, perhaps IOU-hosted databases are not the solution, and the new, external system is needed to be more effective. However, questions need to be identified and explored (which the IOUs are currently doing) regarding all options for a UAS as well as assessment of the opportunities to understand if any systems exist that can be leveraged, especially if the IOUs are going to have to eventually validate customer information.

- **CARE & FERA**

Anthony Abeyta from SCE discussed the CARE/FERA programs which are basic rate programs offering between an 18-30% discount for eligible customers and both tariffs use federal poverty guidelines for income eligibility combined with the number of people in the household. The programs do not verify customers upfront and rely on customer-furnished data. Some sample verification is done after-the-fact to verify whether the participants are on the right rate over time. There are many ways to sign up and apply for an immediate bill discount. About 1 in every 3 households in the California IOU's service territories are eligible and the great majority are enrolled today. CARE/FERA are a prime example of a "front door" for communications and awareness for many customers and can also lead customers to subscribe toother programs being marketed to them. For some IOUs, there is currently over 100% participation for CARE, and it serves as a great awareness platform for all similar low-income programs. The simplicity of CARE results in successful enrollments as many of the barriers to signing up are removed compared to other programs. Information from CARE is often used as source data that is shared with external IOUs and approved agencies, and it is an easy way to promote other programs with similar eligibility criteria. Categorical eligibility is also part of the tariff/program design, which enables the IOUs to align CARE with other programs in California. Due to the passage of Senate Bill (SB) 756 (Hueso) the ESA eligibility guidelines will expand from 200 to 250% of FPL effective July 2022, increasing opportunities for joint participation across programs. Any other programs that are equivalent to ESA/CARE/FERA and the stated FPL may be automatically enrolled. The IOU data security process is rigorous in order to protect the customer. Also, the IOUs' data sharing requirements may be difficult for some entities to achieve because they may have less rigorous standards for customer data protection. Adhering to customer data confidentiality can be legally and technically challenging for some entities and it is acknowledged that access can be a lot of work for non-IOU entities. Mr. Abeyta explained that roughly 70 to 90 percent of customers will fail verification during the post verification process, not because the majority are ineligible, but because the customer fails to provide updated information to verify their eligibility. This is particularly true in the high energy user category of customers but is also prevalent in customers identified via predictive modeling.

- **<u>Community Based Organization (CBO) Perspective on Cross-Program Coordination</u>**

Reverend Frank Jackson from Village Solutions Foundation provided a CBO perspective on program coordination and integration efforts. Reverend Jackson shared the background of his CBO participation and identified several challenges and opportunities for improvement across all programs that are meant to support low-income customers, especially those in Black, Latino, and Asian communities. Right now, it is an exceptionally challenging time due to COVID-19. In poor households there may be only one income provider; and if that person loses their job, the entire household is impacted. There are large bases of Black and Latino communities that are often difficult to reach in sharing program information. People may receive the information in the mail, but it could have been discarded without understanding the benefits. CBOs, especially faith-based support that is often embedded in the community, is a great resource for low-income customers and financially challenged individuals who may have lost a job and want to hear about the resources available to them. Village Solutions Foundation created a resource guide for churches to use to provide customers with links to the various programs such as CSD, the IOU's programs, and school programs. Providing customers with a simple website to use is exceptionally important in hard-to-reach communities. After rent is paid, the next most important expense may be the utility bills. Helping customers to simply access a "source" for where to find support is necessary. Village Solutions Foundation encouraged all the PAs in its service location to provide information such as GRID's programs so they can be shared. Energy education and climate change should be considered "vital information," and even after 20 years of sharing, especially in Black communities, people may still not know about the current programs available to them. Simply put – who is going to tell everybody what you can get at home? Reverend Jackson recommended accessing a central location and providing an interactive solution to categories of customers. For example, if a person lost a job, certain basic programs should be considered or even illuminated. It is important for people to know where to go to find resources, which may come from different types of entities and they may need training. Village Solutions Foundation uses a "Triangle of Success" model that is based on the 1980's Drug Abuse Resistance Education (DARE) program in terms of getting programs to those in need. Essentially, if the "Home", "School" and "Community" get the information in the right hands, awareness will spread. It must be done at a grass roots level and focus on resources, workforce development, and be something simple for people to take advantage of. This often takes time, but it is important to understand that clean energy objectives, such as SCE's Pathway 2045, need to be communicated to youth now, if we want the information to be used by that generation in the future. One of the current barriers right now to program access is communication. Right now, if you go to one site, it may refer you to another site, that refers to another site, creating a circle that often leaves the customer frustrated. Then to ask them to fill out a document on top of it can be discouraging.

D. <u>Discussion 1: Customer Eligibility & Alignment</u>

Participants provided the following summarized thoughts, comments, questions, and solutions.

1. There should be a way for eligibility alignment in categories, so if you sign up for one program you can automatically be considered for another program without having to sign up separately. Perhaps all the programs cannot be done at the same time, but you could certainly reduce the number of separate applications for programs. The major goal set for the UAS should be to help as many customers as possible in as few of steps as possible. For example, one could leverage provision of a Social Security Number (SSN) to access customer information such as age and income. Or program outreach could be done by the program administrator based on eligibility, which would be determined from known or accessible data.
2. The UAS should ask for a couple of criteria and then be able to evaluate which offerings the person or property is eligible for. It would help to provide carve outs that can meet all eligibility guidelines. When the customer looks, all eligible information is passed on to them. This includes creating a centralized database where property owners can also access and enroll for all programs without having to provide documentation each time for each program based on various program rules and timelines.
3. It might be ideal to require the IOU systems to do all the work, but the billing system of the IOUs are in a constant state of flux. How real is it for the IOUs and what is the priority for the IOUs if this mandate would occur? If the Commission comes up with voluntary ideas – would the IOUs push it to the end of the line when compared to billing system issues?
4. The UAS team is looking at all options, including those outside the respective IOUs. It is possible that a UAS could lie outside the IOUs and the UAS would feed the IOU's systems instead of the reverse, but there is still a long way to go in these discussions.
5. Need to better understand where UAS validation occurs, if it is with IOUs, where does it fall within the priority order for the IOUs and what are costs, implementation requirements, upkeep and maintenance, etc.? ESA has healthy administrative budgets, but other programs may not because they are small programs. It perhaps is a question for IOU executive management, but there are silos within the IOUs and all need to be on the same page.
6. Yes, multi-program collaboration sounds like a logistical complexity, but certainly coordinating across incentive programs is a great idea. Seems like all you really need to know for program eligibility is address and income. Instead of putting the administrative burden on the customer to know and sign up for all the programs, perhaps it can be simplified where the address will tell you things like whether it is a DAC or not and income without a complex form. May not need more information. Income documentation can be a big barrier to a simple process. The State of California knows incomes and could coordinate, why put that requirement on participants at all, realizing that data security and privacy are real concerns?
7. Will the UAS also be shared with contractors? Contractors are in the home already and are in the best position to sign customers up for another program

right on the spot. If boots are already on the ground, they should also provide access to the UAS tool to support customer sign ups.

8. The utilities are already working on a UAS and it will be great to get away from 6 different programs having 6 different applications, timelines, and forms – but what do we do in the meantime? How can we go to simultaneous enrollment now until the database is up and running? Contractors could start immediately until the UAS comes through. ESA already qualifies for CARE/FERA DAC-SASH and most AMI programs, so while waiting for UAS, why not allow joint enrollment now? Maybe ESA could pay for it while everyone is waiting for the UAS.
9. UAS may not be available for a while – even a year from now, so having a simplified point until the UAS is available makes sense. Perhaps one website where everything is located.
10. Until there is a master form for all programs, we should employ a centralized home page that asks for name, address and minimum income information, which leads to a simple webpage that indicates what programs a customer is eligible for. This should take place now because "one form" is going to take a while. The customer should be able to put their name in and have the system generate what they are eligible for until the UAS is functional.
11. The Commission is committed to solving the problem.

E. <u>Discussion 2: Coordination, Referrals and Enrollment</u>

1. The San Joaquin (SJV) Pilot leverages various programs. The administrators agreed and developed an application that allowed customers to give consent on one form to share data across several programs. This was beneficial. Additionally, while assessment was occurring onsite at the home, contractors had the additional information needed that allowed for sign-up for other programs such as DAC-SASH. One challenge is in promoting across programs. Whomever is doing the promotion needs to speak to the details of multiple programs if offered and not a lot of folks are educated on offering all programs with so many different rules.
2. The language included in the SJV application speaks to providing customer information, such as name, and address, and the customer agrees to providing information to other programs without sharing things like usage data. The IOUs only need to communicate whether the customer is eligible or not for other programs and it is not necessary for all the personal data to be shared.
3. Difficulty in project coordination and timing. Different programs with different timing of when measures can be installed and may be impossible to do all projects at once. Ideal world we would have everyone come together and have one visit with everything being installed, but it is very difficult to accomplish. Battery storage, solar, etc. have different crews than say water heating or Heating, Ventilation, and Air Conditioning (HVAC). Programs are also always changing.

4. The ESA Program as a one-stop idea is challenging. There may need to for multiple visits and appointments by the nature of the offerings – refrigerator versus HVAC installation.
5. Some things cannot be resolved, but we can still inform customers upfront. For example, if it is going to take multiple visits to educate customers on the process and expectations up front. Most customers will understand that it cannot all be done at once and customers are willing to participate because there is something in it for them. Important to make sure customer experience and education are considered and done upfront to help the customer make an informed decision on what they want to participate in.
6. A warm lead is better than data sharing which is done only on a periodic basis today; may be equivalent to a cold call. Coordination of services can be challenging such as permitting of measures for things like batteries or storage that require separate permits. Presenting all programs at once to customers would be a huge undertaking; but in any event, it is important to ensure we do not shortchange the educational aspects of the programs themselves.
7. There are two distinct buckets of eligibility. Some are in-unit and some are MF building units. Customer may be defined the same but could be treated differently. Who is the point of contact? How can we incentivize contractors to motivate them to sign up for multiple programs and share the cross-program information? Perhaps, the starting point is ESA: first enrolled in ESA then ESA could direct the customer to the other programs based on needs.
8. IOUs and ED are looking at other programs and how they might fit into "need states" as a whole. How do we get need states information to customers? The importance of need states should be further explored.

F. <u>Discussion 3 - Data Information/Sharing Opportunities</u>

1. Approximately 1 in 4 enrollments came from data sharing. Ideally, everyone could get signed up for all programs, if enrolled for one.
2. Periodic cross-program coordination summit is great. It's an opportunity to share what programs are available so CBO's can add to their program list. CBO's also need information not only for programs started but programs ended. Once Covid is over, it is not clear how many programs will also end. There should be a comparison tool that also show what changes are coming. Some customers get information and do not pay attention to it.
3. In terms of data privacy, contractors already go into the customers' homes and need to provide approval for every single measure. How about they just check a box or initial to indicate they approve at the time information is shared? Like the IOUs, contractors also need permission to go in the home. Instead of creating an expensive database, the information could be obtained upfront. When a contractor is with the customer, they tell customers things such as they can get a $15,000 solar system; then if the customer says yes, the contractor can just access the system and refer them to DAC-SASH. Current contractors are not paid to discuss other programs. Paying contractors may be a good interim

solution in the short term that could start in the next month; there's no need to wait.
4. Question – when a contractor signs to share data with an IOU, can the contractor share data with other programs, or does it require each program to provide individual approval?
5. Important to understand the rules of CCPA which is a large barrier because even a name or address triggers private and personally identifiable information. We need to be legally compliant.
6. Data transfer into program design. UAS can spearhead and a be leader for other programs such as for MF property owners. It is important to know that customers can be different than owners. It is important to know that it may not be the customer signing up; rather, the contractor could be signing up on-behalf of customers, tenants, or property owners, each having their own needs that the UAS must address at some level.
7. Customer signing off on sharing data upfront for other programs is an easy fix.
8. Starting off with more discussion on these topics is good. There should be additional coordination summits quarterly or every six months.

G. <u>Discussion 4 – Cost Sharing/Joint Enrollment</u>

1. One idea is to provide funding across programs (joint pot of cash) or perhaps allowing contractors to install multiple program offerings and to charge to each program as appropriate.
2. Question – IOU call centers. Some IOUs have rolled out these programs. Commissioner Shiroma recalled being a Director at SMUD and shared that customers would call worried about being disconnected. Could the IOUs consider having call center representatives determine if a customer is eligible for programs and then help the customer with coordination and customer support. There is no one stop shop framework because you have CBO's, contractors, and IOUs all working together. However, are call center representatives performing this function as well?
3. Call center representatives do discuss bill payment options. In the case of referrals, it is really about time. PG&E is starting a "Next Best Action" approach that will drive toward customer need states for the call center. This is a more customized approach to the customer. Also, PG&E was approved and will be testing the "Virtual Energy Coach". PG&E will be working with contractors to sign customers up for the Virtual Energy Coach and it will allow call service representatives to see all the programs that are available to customers.
4. Question: How do you separate Single Point of Contact (SPOC) model costs among the programs? How do you allocate costs if one person is doing all the program? Today, contractors are already doing this as a SPOC. IOUs should share SPOC procedures. We don't need to reinvent the wheel; we have been offering SPOC for years.

5. SJV pilot program, did the California Public Utilities Commission (CPUC) require a technical paper on lessons learned or are they doing a technical paper that describes best practices?
6. No requirement of SJV to do a technical paper, but the PAs are currently providing lessons-learned through reporting. There will also be a program evaluation.
7. CPUC had to provide a lot of direction to allow cross-funding capabilities for the SJV pilot. It will be important to understand what type of direction was needed and provided to use here. For example, a fixed budget and one vendor across all pilot administrators. The SJV Navigator was provided one budget, so there was no worry about cross-charging programs and the SJV Navigator was included in the scope. The SJV Navigator can also be used to work with the customer without having to worry about the backend reporting, program attribution, and savings or having the participant worry about it.
8. Hueso - sponsored bill was signed by Governor last week, which changed the ESA federal poverty guidelines from 200% to 250%. It takes effect July 1, 2022 and the ESA team is working on it.

H. <u>Closing</u>

1. We appreciate all the experience represented at the meeting and decades of knowledge and coordination. We need to remember that if a customer is qualified, they then should receive all things that they are eligible for and this needs to be incorporated into the customer experience. Roll up your sleeves.
2. Thank you to all the presenters. We need to see ideas become actions and continue to help shape opportunities going forward.

I. <u>Next Steps</u>

1. Informal comments will be allowed until next week and will be considered in the post workshop report. The program eligibility guidelines of various programs are now posted on energyweb. Keep the ball rolling and identify good solutions. There are plans to improve upon what we discussed and build better leveraging/coordination opportunities.
2. Participants were asked if they had any additional questions or comments. This was followed by a review of next steps that included 1) informal comments would be accepted until October 7, 2021, and 2) the upcoming submittal of a Tier 1 advice letter that would include a workshop report and other requirements will take place within 30 days of the workshop. The comments that were received are found in Attachment C.

ATTACHMENT B

ATTACHMENT B

Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company Clean Energy Programs Workshop Plan

Background

D. 21-06-015, OP 44, directs the joint IOUs to submit a Plan which details how the Joint IOUs will increase and improve referral, leveraging, and coordination efforts across low income and clean energy programs along with the workshop summary. The Joint IOUs have discussed the workshop, informal comments received during the workshop and after the workshop by October 7, 2021. Significant policy issues were raised that may require further CPUC and/or other State agency consideration or potential legislative changes, which are outside the scope of this Tier 1 advice letter and the IOUs authority.

The Joint IOUs recognize the significant number of changes that are currently being implemented as a result of the CPUC Decision on the Low-Income programs,[1] specifically, the overall new design of the core ESA program and the introduction of new pilots, which move toward a more customer-centric model, are requiring considerable attention. The Joint IOUs remain strongly supportive of cross-program coordination and leveraging that streamlines access and availability for customers; however, we do not recommend further significant changes until after the transition of the ESA, CARE, and FERA changes are stabilized.

The Clean Energy Program Workshop laid out stakeholder ideas and challenges to leveraging and coordination of many different types of low-income programs, such as different eligibility requirements, program purposes, varying levels of funding as well as the important roles of contractors, community-based organizations (CBOs), program implementers, and PAs. This Tier 1 AL provides coordination and leveraging plans that the IOUs will implement. Given the extensive amount of change occurring, the Joint IOUs anticipate the plans to be an initial step in additional coordination and leveraging activities which will progress as new practices and innovation are adopted.

Based on this background and the joint IOU discussions, the following plan is submitted:

Increase And Improve Referral Process

A. The cross-functional leveraging and data exchange between PAs that facilitates referrals needs further exploration to understand the similarities and differences in program processes and procedures. The results of this exploration are anticipated to result in an improved, more standardized approach to referrals across low-income programs.

The Joint IOUs recommend that the ESA Working Group be tasked with developing a template that can be distributed to other relevant low-income programs that would help with identifying the timing and frequency of each PAs' program or pilot referral processes. Each program and/or PA may be sharing referrals and lead generation at different times, different levels of frequency, and through different channels. While PAs report recent improvements in data sharing activities, the ESA Working Group may serve as a valuable arena for recommending improvements to current data sharing

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[1] D.21-06-015.

activities and identifying potential for future leveraging in the program. The template will support the ESA Working Group in identifying best referral practices and procedures that can be used to maximize coordination activities and ensuring program alignment.

Universal Application System (UAS)

The IOUs acknowledge that the UAS was brought up throughout the workshop as a potential solution for referrals, data sharing, and/or centralization. The IOUs and ED Staff are looking forward to the formation of the UAS sub-working group (from the ESA WG) per D.21-06-015[2], to allow the issues raised within the Clean Energy workshop to be examined, and will provide its relevant findings in the report submitted on July 1, 2022.[3].

B. Evaluate Opportunity to Add Data-Sharing Language to the ESA Enrollment Application

Several workshop participants identified the challenges in data sharing between programs and administrators based on legal barriers, information system challenges, and customer confidentiality or privacy concerns, among others. The Commission should consider establishing policy for all the programs in its' jurisdiction that enables the PAs to share discrete and necessary data amongst each of the programs. The policy should essentially provide for customer acknowledgement that by signing up for CPUC-authorized ratepayer funded programs, the customer agrees to share their information with other PAs with CPUC-authorized programs. While this policy may not be retroactive to referrals that were previously shared under program administrator non-disclosure agreements, it may facilitate an easier method of data-sharing going forward.

Leveraging And Coordination Efforts

The Joint IOUs discussed methods of leveraging and coordination efforts among the various programs. While there was a desire to coordinate and leverage at a statewide level for all programs, the Joint PA's expressed potential concerns with trying to effectuate frequent coordination among the numerous State- and Federally authorized low-income programs that may exist. The IOU's expressed that ESA, CARE, and FERA programs in conjunction with the LIWP, Low Income Home Energy Assistance Program (LIHEAP), Lifeline, AMP, PIPP, Critical Care Battery Backup, Medical Baseline, SOMAH, DAC-SASH, and other eligible programs or pilots is already a significant leveraging and collaboration effort. Additionally, coordinating with the San Joaquin Valley Pilot, SGIP, demand response programs, water, and broadband, all at one time, can be very difficult for either a tenant or a property owner to fully comprehend because of information overload. Leveraging and coordination requires a delicate balance of supporting all eligible low-income programs and ensuring the customer is not confused.

The IOUs believe that opportunities for leveraging and coordination are vital elements for these programs in reducing the energy burden for all eligible customers including (1) bill reduction, (2) energy conservation to support the grid, and (3) cleaner energy offerings that reduce greenhouse gas (GHG) emissions but may be overwhelming from the customers' perspective due to the sheer volume of offerings and various requirements. The Joint IOUs believe that coordination and leveraging works best at the local IOU level in partnering with other program contractors, community-based organizations (CBOs), and implementers for a diversified

[2] D.21-06-015, OP 45 and 46.
[3] *Id.*, OP 46.

customer base of tenants, property owners, and managers to identify the programs and services that meet their community's needs.

At the same time, the statewide ESA Working Group directed by D.21-06-015 will continue to provide consistency and decision-making on statewide program rules as the program continues to evolve.[4] . Additionally, the IOUs realize that occasional input and communications from all interested stakeholders has collaborative value and allows for new and innovative changes. For this reason, the Joint IOUs propose an annual stakeholder meeting with all low income, equity, and interested stakeholders to identify barriers and solutions as new programs are adopted and old programs retire. The focus of the annual meetings would be to discuss near-term mechanisms to continuously improve referrals, coordination activities, and to address goal attainment with a special emphasis on collaboration and leveraging best practices and activities. Establishing these inclusive statewide meetings and ensuring proper levels of participation and diversified discussions is a significant undertaking and therefore are only recommended annually with shared hosting responsibilities alternating between Energy Division and the joint IOUs. Additionally, the IOUs should establish communication at both a statewide and local levels based on needs with their agencies and community partners.

Additionally, the Joint IOUs will use the learnings, best practices, and partnering relationships established from the San Joaquin Valley pilot and the Categorical Eligibility Study Results to support coordination and leveraging opportunities. While no formal technical paper was required for the pilot, there are many lessons applicable to leveraging and coordination that go beyond the experience of ESA, CARE, or FERA alone. These learnings will be particularly important in understanding disadvantaged and hard-to-reach communities in making sure the proper method of communications, access to programs with greater levels of trust, and varying community engagement strategies are properly incorporated into program design and outreach plans.

Proposed Schedule Across the Program Cycle

Activity	Timing	Justification
Hold Ongoing Joint PA Collaboration Workshops	Annually 2022-2026	Program stakeholder alignment across various programs (new or ending) requires close coordination and communications with all low-income stakeholders to maximize cross-program customer delivery, continuous improvement in what is being delivered, and ongoing customer support to make the process easy and efficient.
Explore Adding Cross-Program Customer Data Sharing Approval Clause into Enrollment Application	2022	Explore LIWP and other programs internal or external to the utility business that provide customer approval of data sharing. After ESA Working Group review,

[4] D.21-06-015, OP 177.

		determine and file, if necessary, for approval to add customer data sharing approval to some or all low-income applications that utilize ratepayer funds and/or provide a relevant benefit.
Ongoing Consideration and Design of a UAS	TBD pending UAS Report	The UAS, if designed and funded properly, is potentially one way to provide a cross-functional scheduling system and program information tool to improve cross-functional customer offerings that goes beyond existing data sharing capabilities. The UAS may be an opportunity to provide for real time "warm referrals" and installation scheduling opportunities that do not exist today and may be a solution to improve cross-functional customer participation.
Explore Results & Adopt Best Practices from the SJV Pilot	2023	The SJV pilot was a significant cross-functional program and tariff effort that demonstrated cross-coordination and leveraging. Best practices from the pilot should be explored and leveraged in low-income programs moving forward.
Explore Results & Adopt Best Practices from the Categorical Eligibility Study	2023	Additional learning opportunities exist from the use of categorical enrollment – especially as program requirements and alignment continue to change. Best practices should be adopted.

New Metrics

The Joint IOUs propose the following tracking and reporting-only metrics for inclusion in the annual reports beginning with the Program Year 2022 Annual Report that will be filed in 2023.

"The administrators or implementors of the programs and tariffs identified D.21-06-015 shall report annually the number of referrals provided to other PAs for participation and the number of leads they successfully acted on by program type."

The purpose of the metrics is to provide a transparent showing of leveraging and coordination efforts between program referrals and their effectiveness in being acted upon. This will support transparency of the referral process and effectiveness by program type.

Reporting Templates to be used in the monthly and annual reports

The Joint IOUs shall work with the Energy Division (ED) Staff to determine the proper template to be used for capturing referral generation and referral success, plus comparison metrics for reporting purposes of the metric data above.

Other future considerations to be incorporated into the mid-cycle process

The Joint IOUs are not aware of a formal date for a mid-cycle review process; nevertheless, the Joint IOUs recommend that the Commission consider the following significant policy issues as part of any formal mid-cycle program review:

- Are cross-program capitation fees appropriate given that the Commission has approved such fees for CARE program referrals?
- What is the appropriate mechanism to ensure across-proceeding and state agency decision-making provides for consistent programmatic changes across multiple jurisdictional and/or budgetary authorities? Should a single definition of low income be defined across all state programs along with standardized policies and procedures that allow for easier collaboration, leveraging, and customer access to various programs that are not consistent today? Is it feasible and/or appropriate?
- What are the appropriate funding allocations for joint program activities if each program has various budgets and timeframes? Is it feasible to establish one pool of cross-functional program funds and how would it work to increase leveraging and coordination efforts?

ATTACHMENT C

AMERECOS Comments

Please see below:

Universal Application Comments
ESA Contractor Customer Representatives are making 80 -120 calls per day individually. The calls collectively vary per location. A lot of the customers we call are screened to see if they qualify for ESA and then moved forward or disqualified from the program. The ones that are moved forward are put on the schedule where on average 30% of the customers we visit do not qualify for the program once documents or income is presented as proof. For these reasons using ESA contractors or any contractors to administer the universal application either via phone or app in person would prove successful.

Right now, it is as if we are trying to find a needle in the hay stack and telling customers that “yay you qualify” or “sorry you do not qualify”. With the universal app it would be nice to say “hey here is a ton of programs offered by the utility programs, let me collect some information from you to see which you qualify for…” I have provided an example flow chart:

Contact is made with customer: either through canvassing or phone

Customer Service Agent (CSA) or Field Staff (FS) pulls up the UA (Universal app website)

Explains to customer “ ______ (Utility Program) has several programs that you may qualify for, by asking you these next group of questions we will better be able to find out which programs you qualify for!”

CSA or FS fill in the qualifying questions (These questions should be a sum of the questions that would qualify them for the programs available)

After pressing submit the UA website will show the CSA/FS what programs the customer pre-qualifies for (pre-qual since some may require proof/supporting documents) “Awesome, customer looks like you may qualify for ______ (number of programs), I am an ESA contractor so what I will do next is take care of the information I need in order to get your participation secured in ESA and then I will connect you to one of my partners from _______”

CSA or FS complete ESA process and then complete a warm transfer to the next contractor or program.

Above is a short term proposed solution that can be easily created and implemented. The long-term solution will be more complicated and must navigate a lot of obstacles, but I hope that this will help. Of course, since we are ESA contractors the flow chart is from that perspective, but I am sure you could swap it out to work with whomever.

Another thing that could be useful especially as it relates to cold calling and canvassing is educating contractors on all the programs available, so that we can maximize the help we provide to the customers.

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INFORMAL COMMENTS CONCERNING
"Energy Savings Assistance (ESA) Program Coordination with Clean Energy Program and Low-Income Programs"
Prepared by
Free Energy Savings Company LLC, dba
Quality Conservation Services
October 7, 2021

Quality Conservation Services (QCS) strongly supports the IOUs plans to develop a universal application for all low-income related utility programs and believe it is the ideal outcome. However, based upon reports from the IOUs and past experience, we expect this will take a minimum of an additional year to develop and seek approval,

Allowing for potential delays and approval and implementation time, we might expect an actual coordination effort through this mechanism that might not be available until early 2023. This is, we believe, the long-term solution. But we need short term solutions to carry us through the interim period, however long that may be.

Our comments are to recommend a short-term solution to this short-term problem. Specifically, our recommendations are:

1. Allow, not mandate, ESA Providers to refer and enroll low-income families in other CPUC-authorized programs supplying services to the low income at no cost.

2. The costs of these referrals can be paid for by the programs' providers in the same manner as Capitation fees are paid for referrals to CARE/FERA; costs should not be charged to the ESA program.

3. The concerns about this process should not be over blown; the procedures have to some extent already been demonstrated within in ESA and/or other comparable efforts.

The following discussion seeks to answer some of the questions which have been posed concerning this type of practical short-term solution:

Q. What is the preferred process for coordination?

The ideal situation is that all of the programs have the same enrollment form and database, what we have heard spoken of as a Universal application. And we strongly support that effort. It would also important that all programs had the same income qualifications and verification procedures so that once qualified for one program, all other programs can be qualified. This “universal” application has been a goal of low-income advocates for many years and it appears that there is now a significant effort to make that a reality. The issue is what is the solution to deal with the coordination problem now in the interim while we await the ideal universal application process to be approved and implemented.

Q. What programs are important to be coordinated?

Ideally, all of the state’s low-income and equity programs should be coordinated under the Universal Application. However, the legal, federal, and departmental requirements make this extremely difficult. A more reasonable alternative is to allow the CPUC approved low-income and equity programs would be the first step to be coordinated. Those which could be coordinated include the following: Energy Savings Assistance (ESA), CARE, FERA, SGIP Equity and Equity Resiliency, DAC-SASH, AMP, PIPP, DAC Green Tariffs, CAP Water Programs, Lifeline, Affordable Broadband, as well as the related multifamily programs of SOMAH and MF-CAM. There could also be some coordination and referrals with the CSD programs.

Q. What should be done while the Universal Application is being developed?

Allow and encourage the various individual CPUC-approved ESA, low income, and Clean Energy programs to provide sign-ups and referrals for each other’s programs as they stand. In particular, since ESA is already providing 300,000+ energy education visits to certified low-income residences each year, allow ESA to enroll and refer eligible customers to the other low-income programs. Similarly, the other programs should provide referrals to the ESA Providers.

Q. How important is having ESA Providers involved in the referral and cooperation effort?

Essential. ESA is by far the largest and most extensive energy education program in California, reaching 25-30,000 low-income families each and every month. It reaches into virtually every community and type of low-income customer in the state. Moreover, at an income qualification of 200% of FPL, ESA participants meet the income requirements of all other equity and low-income programs. Thus, if a household has qualified for ESA, they are extremely likely to meet the income qualifications of all the other programs. Moreover, since we have already visited and enrolled the family, they know that there is no cost to our program. That gives the ESA Provider much stronger credibility to recommend other no-cost programs to help that low-income family. (While CARE is larger, there is much less direct contact with the enrollees and less effort to undertake a comprehensive energy education.)

Q. How do we pay for each of these referral programs?

The individual programs should not be asked to cover the extra costs of providing referrals or enrollments for other programs. Each of the programs has its own marketing and outreach budget. A referral from another program is just one other type of marketing that needs to be covered. A program that receives a qualified referral could pay a stipend to the other which reflects, at first evaluation, the “avoided costs” of securing that qualified participant on its own. This could be adjusted for various factors.

Q. How do we deal with participant privacy issues?

Any referral should have the participant’s prior approval to have their data shared. This could be done with a simple approval paragraph giving such permission in each application or as a separate form to be signed off by the customer. Alternatives to this would be a form with a checklist of the specific program(s) for which the participant would allow referrals or have the customer sign a separate form or referral for each program of interest.

Q. What if IOUs are not ready to distribute referrals to other programs?

Considering the demands placed upon utility IT departments, this should not hold up this cooperative effort. Simply allow the individual ESA providers conduct the pre-qualification and referrals directly with the other programs. If they wish to be helpful, the IOUs need only provide a list of the ESA Providers to the other programs and provide a listing of the other program administrators to their ESA Provides. However, even this is not necessary as any Provider or Administrator can go the internet and secure the contact information needed. Nor do the referrals need to go through the IOUs, since each ESA Provider (as well as other program Providers) can forward the referrals and/or enrollments to the respective programs.

Q. How would the Referral Providers be paid if the IOUs are not ready?

We need not rely upon a processing of the payments by the IOUs if they are not ready to do so. Payments can be made directly by the Programs to which a referral is made to the entity securing the referral. The IOUs are already doing this for CARE/FERA referrals in the form of Capitation Fees. Also, several of the other programs (e.g., DAC-SASH) ae offering the public certain referral fees; these could be extended to those securing referrals, or extra may be suggested since these will be pre-qualified referrals and some of the data collection would be already completed.

Q. Would the referral cooperation be mandatory or optional?

We recommend the participation by ESA (and other) Providers be optional until such time as the IOUs are prepared to undertake the universal application and its coordination with other programs. Among other aspects, this is similar to a test opening where we can learn what the negotiated cost sharing might be and some of the potential problems before going system wide. It is reasonable to make such work mandatory once the IOUs are willing to undertake parts of the referral programs. For example, the current ongoing referrals between CARE and ESA is a valuable part of both programs. Also, there are mandatory referrals to ESA by SOMAH and MF-CAM and DAC-SASH programs, processed through the IOUs. However, until the IOUs are ready to undertake this procedure and make it mandatory, we recommend it be kept optional.

Q. Won't the cross training of so many different programs be too cumbersome?

No. We do not seek to train the Outreachers in the nuances of every other program. Only to prequalify against the program requirements and assuring the interest and willingness of the low-income household. For example, an ESA Outreacher already doing energy education can readily determine if the family is a single-family owner-occupied home within a DAC that would be interested in having the home evaluated for a rooftop solar system and secure a written request to be evaluated by the solar program. Similarly, we can do the same for a low-income home in a high fire threat district about an SGIP Equity Resiliency battery back-up. Or price reductions through a CAP water program, or Lifeline, or Affordable Broadband, or any other no cost program for which they might qualify.

Q. What about referrals to EE programs that are not offered at no cost?

Sorry, but absolutely not. By far the biggest problem we have is skepticism about the no cost nature of the ESA services. Every home sales effort begins with a "no cost" or "free offer". Whether that is a free furnace evaluation, a free energy audit, a free cosmetics make-over, a free home decorating offer, everyone understands that before that salesperson leaves the home, they will try to sell you a new furnace, new windows, a set of cosmetics and a new set of furniture. If it were to get out that the ESA Outreacher guided them to a program where they had to buy something or to make some type of financial commitment, our outreach efforts would be massively set back and what little good will we have developed would be put at serious risk. We ask that we continue to forbid any ESA referrals to any program that requires a customer co-pay.

Q, Will offering different programs cause customer confusion?

No. All of the programs are no-cost income qualified programs generally related to energy. Also, the Outreacher will only be speaking about a subset of programs. For example, only the 25% of the population in DACs would be considered for DAC-SASH or DAC Green Tariffs; an even smaller group would qualify for SGIP Equity Resiliency program.

Q. Won't the Outreachers become confused about the different programs being offered?

No. The Outreachers are already used to many different "packages" within ESA. For example, the allowed measures for any given low-income home differ between renters and owners, between single-family and multifamily, between each of the climate zones, the fuel source and age of appliances, the ownership of the appliance, and many more. The differences among the programs to be included are far more distinct and understandable and justifiable.

Q. Are there real-world examples of one entity referring or enrolling low-income families for different programs.

Definitely. Almost all major Community Based Organizations (CBOs), including those who are not already ESA Providers help refer and enroll low-income customers almost every day to various programs, each which may have different requirements and/or forms. Any questions we may have about the need for excessive training or confusion have been answered by the daily experience of these CBOs working with these same low-income families. It is already being done. All we're recommending is that it be done a much larger scale to as to reach those low-income families who are not being reached by other programs.

Q. Won't the customer get confused or frustrated with many different installer visits from the different programs?

Doubtful. Within ESA, the customer is already exposed to multiple installer visits. ESA Providers often have different specialized crews dealing with general weatherization, HVAC work, appliance repair and replacement, in-house inspections, followed by a utility inspection. In some cases, the IOUs themselves use different contractors for different parts of the program. The same or more visits would be required whether the programs referred low-income customers to each other or not. ESA participation, which usually has the shortest timeline, would be a major benefit to other major Clean Energy programs which take a much longer time for processing and permitting and installations. By matching them up with ESA, the low-income family receives some of the benefits right away, while they are awaiting the larger programs.

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If any participant or anyone interested in this issue would like to discuss it further with us, we are happy to help examine the process further and to adapt and include other ideas. The key is to provide improved and more extensive services to the hundreds of thousands of low-income families ESA will treat while we develop and implement the universal application system.

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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
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