

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6433E
As of April 14, 2022

Subject: Green Tariff (GT) & Enhanced Community Renewables (ECR) 2022 Marketing Plan
Marketing Implementation Advice Letter

Division Assigned: Energy

Date Filed: 12-15-2021

Date to Calendar: 12-17-2021

Authorizing Documents: D1501051

Disposition:	Accepted
Effective Date:	01-14-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

December 15, 2021

Advice 6433-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Green Tariff (GT) & Enhanced Community Renewables (ECR) 2022 Marketing Plan Marketing Implementation Advice Letter

PG&E referenced the guidance and requirements provided in the Green Tariff Shared Renewables (GTSR) Decision¹ when developing the marketing implementation advice letter. PG&E developed the 2022 marketing outreach plan to promote PG&E's Solar Choice (Green Tariff) and Regional Renewable Choice (Enhanced Community Renewables) programs.

The marketing plan includes:

- A. Background
- B. Marketing Objectives
- C. Target Markets
- D. Outreach Channels and Tactics
- E. Metrics and Evaluation Plans and Schedules
- F. Estimated Budget
- G. Customer Tools and Information Availability

2022 Green Tariff ("Solar Choice") Marketing Plan

A. Background

Historically, PG&E files an ME&O plan annually in accordance with the program's requirements that includes an acquisition component. As of Spring 2021, the program had more enrollments than available supply coming from dedicated resources. A petition for modification was approved in a Proposed Decision (PD) on

¹ D.15-01-051. Page 138

Friday, 11/12/21 to use interim resources for the current enrollment but not for future enrollments. Furthermore, the PD prohibits PG&E from enrolling new customers in the program until additional dedicated resources come online. PG&E plans to procure these resources in accordance with the Commission's timeline set forth in the PD but until that is completed (expected to be completed in 2023-2024), there is no need for acquisition marketing. As a result, the below 2022 marketing plan is solely focused on a communication to existing enrolled customers. In addition, PG&E has included metrics on the outreach conducted in early 2021 for reference.

B. Marketing Objectives

- Provide existing customers program updates to help keep customers on the program while meeting regulatory compliance requirements.

C. Target Markets

Existing Enrolled Solar Choice customers

Residential segmentation includes a renter segment in addition to a general/homeowner and low-income segment.

1. Renters: Residential customers with green interests, who tend to be a younger demographic, just starting out in their career, have lower usage bills and lower household incomes.
2. General/Homeowner: Residential customers, who are open to green energy, value the convenience and are unlikely to adopt rooftop solar due to limitations (roof space, shading.) Unlike renters, homeowners tend to be more established in their career and have higher household incomes.
3. Low Income: Customers wanting access to renewable energy.
4. Non-Residential: Businesses who value the environment and meeting clean energy goals.

D. Outreach Channels and Tactics

PG&E plans to issue one retention newsletter in 2022 sharing any relevant project updates and topics of interest to enrolled customers.

E Metrics and Evaluations Plans and Schedules

PG&E has established criteria for tracking and measuring success to maximize enrollments. Below are the planned 2022 metrics as well as PG&E's 2021 email marketing results

2022 Planned Marketing Metrics Targets:

Marketing Tactic	In Market Timing	Marketing Key Performance Indicator Targets*
Email/Direct Mail Retention Newsletter	TBD	-Enrolled Customers Reached - Open rate: ~40% - Click through rate: ~3%

*Based on 2019 Solar Choice Retention email Newsletter performance

2021 Email Marketing Metrics

Marketing Tactic	In Market Timing	Marketing Key Performance Indicator Targets**	Results
Email	3/15	- Open rate: 22-25% - Click through rate: 1.2-1.6% - Enrollment: 0.03-0.05%	Open rate: 25.7% Click through rate: 2.14% Enrollment: 0.035%
Email	4/22	- Open rate: 22-25% - Click through rate: 1.2-1.6% - Enrollment: 0.03-0.05%	Open rate: 23% Click through rate: .80% Enrollment: 0.020%

** Based on historical Solar Choice email acquisition performance

E. GT and ECR Estimated Budget

The budget below includes expected outreach expenditures for 2022.

2022 Estimated Budget		
Tactics	2022	Customer Segment
Retention		
Direct to Consumer Outreach (email/print newsletter)	\$15,000	Residential/ Non-Residential
Additional Costs		
Labor & Overhead	\$ 5,000	N/A
Total Marketing Budget	\$20,000	

G. Customer Tools and Information Available

PG&E provides customers a variety of tools and information to assist in understanding the PG&E Solar Choice and ECR program options.

Tools and information available on the PG&E website and sent to customers post-enrollment:

- The Green-e Product Content Label provides customers with information regarding the renewable resource type (solar) in their Green-e Energy certified product, as well as information about the location of the generation.
- The Green-e Terms and Conditions will assist customers in understanding the details of the pricing and any terms associated with their participation in PG&E Solar Choice or ECR program.

Tools and information available on the PG&E website:

- An Interactive Resource Map will show customers the location, size, developer and other information regarding PG&E Solar Choice resources.
- An ECR Developer list will show customers a list of developers with active ECR projects.

2022 Enhanced Community Renewables (“Regional Renewable Choice”) Marketing Plan

The enhanced community renewables option will be marketed by both PG&E (as described below) and third-party developers, as well as by others interested in selling power to PG&E through ECR. Additionally, PG&E will work towards facilitating customer and developer interaction to help program adoption.

PG&E Outreach

PG&E’s plans to incorporate ECR outreach into the following outreach:

- PG&E’s website will inform customer of the ECR option and direct them to a listing of active projects.
- PG&E will provide customer disclosures, post these on its website as well as send it to customers within 60 days of enrollment (i.e. when the customer will begin to receive a bill credit from the utility) and re-submit annually at re-enrollment. The customer disclosures will include a brief description of the program, cancellation process, pricing information, and default electricity mix.

Third Party Materials Review

Decision 15-01-051 requires PG&E to review all developer marketing materials before they are used to market to customers. All developer marketing materials must comply with the following:

- Green-e Energy Developer and Generator Requirements²
- The California Public Utility Commission's Community Choice Aggregation Code of Conduct³, which includes marketing and outreach requirements relative to Community Choice Aggregation.
- Must be truthful, accurate and not false or misleading.

More information can be found on PG&E's ECR website⁴ under the program-specific requirements for developers which links to both the Green-e guidelines in a document called "The California Enhanced Community Renewables Information for Developers and Generators" and the CCA Code of Conduct. Developers must include PG&E's disclaimer and logo usage guidelines if the PG&E logo is used on the materials.

To follow this prerequisite for participating under this Schedule, developers must submit a marketing review packet to PG&E containing all marketing materials the developer intends to use to market to any potential ECR customers. These materials must align with the requirements of either Marketing Phase One Community Interest or Marketing Phase Two Customer Enrollment as provided in the Green-e Energy Developer Requirements. Green-e also participates in the review of the marketing materials as the bulk of the requirements stem from Green-e compliance. If PG&E and Green-e, in its reasonable discretion, determine that the marketing materials do not meet the criteria, the ECR Applicant must update the materials and re-submit the documentation to PG&E. PG&E must grant final approval for Phase One Community Interest prior to offer submittal and before engaging in an initial 'community interest' phase. PG&E must also grant final approval for Phase Two Customer Enrollment prior to signing a Customer Developer Agreement (CDA) or other binding commitment with the customer. The CDA is not considered part of the ECR Applicant's marketing materials and should not be included in the marketing package sent to PG&E for review.

² <https://www.green-e.org/docs/energy/ecr/ECR%20Developer%20Requirements.pdf>

³ Decision 12-12-036. Decision Adopting A Code Of Conduct And Enforcement Mechanisms Related to Utility Interactions with Community Choice Aggregators, Pursuant to Senate Bill 790. December 20, 2012.

⁴ https://www.pge.com/en_US/for-our-business-partners/energy-supply/electric-rfo/wholesale-electric-power-procurement/regional-solar-choice-program.page

Protests

*****Due to the COVID-19 pandemic, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than January 4, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

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

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

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

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

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 6 of D.15-01-051, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, January 14, 2022, which is 30 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.12-01-008, A.12-04-020, and A.14-01-007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

Attachments

cc: Service List A.12-01-008, A.12-04-020, and A.14-01-007



ADVICE LETTER SUMMARY



ENERGY UTILITY

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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6433-E

Tier Designation: 2

Subject of AL: Green Tariff (GT) & Enhanced Community Renewables (ECR) 2022 Marketing Plan Marketing Implementation Advice Letter

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 #: D.15-01-051.

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 1/14/22

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Sidney Bob Dietz II, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

**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
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