

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6434E
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Subject: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013

Division Assigned: Energy

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From: Energy Division PAL Coordinator

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December 15, 2021

Advice 6434-E

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

Subject: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013.

Purpose

In compliance with Decision (D.) 18-08-013, issued on August 17, 2018 in Pacific Gas and Electric Company's (PG&E) 2017 General Rate Case (GRC) Phase 2 Proceeding, PG&E submits this information-only Advice Letter (AL) to report on its progress to increase Family Electric Rate Assistance (FERA) program enrollment.¹

Background

The FERA program (also known as the Lower-Middle Income Large Household Program) provides rate assistance to large households of lower-to-middle-income customers.² The FERA program was designed to assist larger families that are ineligible for the California Alternate Rates for Energy Program (CARE) rate because their income level falls slightly above the CARE program income eligibility limit.

FERA is available for households of three or more individuals that have a total household income of between 200% plus \$1 and 250% of the Federal Poverty Level (FPL) guideline.³ The income threshold increases with each additional family member over three people. Eligible FERA participants currently receive an 18% bill discount for their electric usage.⁴

¹ D.18-08-013, Ordering Paragraph (OP) 15, states, "PG&E shall report to Energy Division by the end of 2018, 2019, 2020, 2021, 2022, and 2023 on its progress to increase FERA subscription by filing information-only advice letters that are served on the service list of this proceeding."

² The Commission authorized the FERA program in D.04-02-057.

³ D.05-10-044 increased the lower income limits of the FERA Program were raised to 200%+\$1 of the Federal Poverty Guideline levels.

⁴ In D.15-07-001, the Commission changed PG&E's FERA discount to a 12% effective discount as a single line-item on PG&E's bills. In 2018, Senate Bill (SB) 1135 amended Public Utilities Code Section 739.12 to increase the FERA discount to 18% effective January 1, 2019.

In PG&E's 2017 GRC Phase II proceeding, the California Public Utilities Commission (CPUC or Commission) expressed concern that the FERA program is not highly customer subscribed.⁵ Noting that PG&E's CARE customer participation rate is much higher than its FERA participation rate, the Commission ruled:

It is appropriate and necessary for PG&E to significantly increase its rate of FERA participation. Ultimately, PG&E should achieve a similar subscription level for FERA as for CARE. At this time, we require PG&E to make significant efforts to increase its FERA subscription level over the next six years, with the aim of achieving a 50% subscription level.⁶

The 2017 GRC Phase II decision prescribed several actions for PG&E to increase FERA participation, including: focusing efforts on the Central Valley (CV), conducting one or more workshops in the CV, and submission of an updated AL to inform the Commission of PG&E's plan to use unspent CARE marketing funds to increase FERA enrollment.⁷ Included in these requirements is an order to submit an information-only AL to report on FERA participation progress. The AL is to be filed at the end of each year through 2023.⁸

Progress Report Toward Increasing FERA Enrollment

In compliance with D.18-08-013, PG&E hereby reports on its progress toward increasing FERA enrollment from December 1, 2020 until November 30, 2021. FERA statistics for the month of December 2021 are not available at the time of this AL submittal.

⁵ D.18-08-013, p. 74.

⁶ *Id.*, p. 75.

⁷ *Id.* PG&E filed Advice Letter 3990-G-B/5329-E-B on October 8, 2018 to detail its marketing plans to increase FERA enrollment.

⁸ *Id.*, OP 15.

I. Participant Information

Table 1: FERA Program Enrollment from December 1, 2020 - November 30, 2021

Month/Year	FERA Estimated Eligible Customers	FERA Enrolled Customers	FERA Penetration Rate	Discount Provided to FERA- Enrolled Customers
December 2020	166,357	34,692	21%	\$1,120,893.49
January 2021	152,625	35,592	23%	\$1,106,214.92
February 2021	152,625	36,692	24%	\$ 946,611.36
March 2021	152,625	37,269	24%	\$1,073,832.76
April 2021	152,625	37,701	25%	\$1,012,122.66
May 2021	152,625	38,136	25%	\$ 975,415.87
June 2021	152,625	38,371	25%	\$1,305,589.36
July 2021	152,625	39,107	26%	\$1,638,025.82
August 2021	152,625	39,795	26%	\$1,731,015.87
September 2021	152,625	40,117	26%	\$1,572,829.60
October 2021	152,625	40,940	27%	\$1,181,413.77
November 2021*	152,625	38,758	25%	\$907,498.98
Total	152,625	40,940	27%	\$14,571,464.46

(a) Final annual data for 2021 will be reported in the FERA Annual Report, to be filed on May 2022.

II. Marketing

Key Findings:

- o Despite executing FERA specific marketing campaigns to FERA expected eligible target audience, 84% of responders enroll in CARE.
- o A Q3 targeted marketing campaign with FERA-specific messaging drove more than six CARE enrolments to every one FERA enrollment.
- o The presentment of FERA and CARE on the same application negatively impacts the ability to grow FERA penetration rates at the pace needed to achieve 50% enrollment goal.
- o PG&E tested a new FERA Propensity model in the Q3 2021 acquisition campaign and achieved a 10% lift in response rates in the top decile compared to the previous model.
- o Online enrollments continue to be the top channel of choice for new FERA enrollments delivering 74% of total new enrollments
- o 2.2M bill inserts delivered 297 new FERA enrollments.

Based on the directives in D.18-08-013, PG&E developed and submitted the Marketing and Outreach (M&O) Plan for the FERA program via PG&E's AL 3990-G-B/5329-E-B on October 8, 2018. The M&O Plan detailed PG&E's proposals for using 2018 through 2020 available and unspent marketing funds allocated to the CARE program to increase customer enrollment into the FERA program. Also as directed in D.18-08-013, PG&E proposed a longer-term FERA specific M&O proposal and budget in its Testimony for 2021-2026 Low-Income programs and budgets application, filed on November 4, 2019.⁹ The proposed FERA M&O strategies and budgets for 2021-2026 program years were generally approved in D.21-06-015, issued on June 7, 2021.¹⁰

In 2021, PG&E continued to execute and evolve the strategies outlined in the M&O plan to grow FERA awareness and enrollment:

- Build FERA awareness through continued marketing and outreach efforts.
- Test, learn and optimize, evolving outreach strategies and tactics based on results, and application of lessons learned.
- Use of channels that were successful in driving CARE acquisition to effectively reach FERA customers.
- Leverage customer insights and research to inform FERA messaging development and testing for FERA outreach.

PG&E continues to leverage best practices and optimize outreach efforts. Marketing efforts in 2021 focused on evolving targeting capabilities and improving message effectiveness. Test plans were designed and implemented throughout the year to improve FERA enrollment.

Another key driver for the increase was the continued pause of post-enrollment verification and recertification processes, as part of the Commission's direction to PG&E in Resolution M-4842 [EMERGENCY AUTHORIZATION AND ORDER DIRECTING UTILITIES TO IMPLEMENT EMERGENCY CUSTOMER PROTECTIONS TO SUPPORT CALIFORNIA CUSTOMERS DURING THE COVID-19 PANDEMIC] to offer emergency customer protections.¹¹ The lack of normal program attrition plus the new enrollment driven by marketing drove a 17% year over year increase in enrollment penetration (23% in January 2021 vs 27% in December 2021).

Despite increases in marketing and concentrated effort towards continuous improvement, had recertification and post-enrollment verification been active in 2021, the final penetration rate would have been lower based on historical attrition rates. Results from 2021 emphasize the challenge to effectively target and enroll customers in the FERA program.

⁹ PG&E Testimony, Chapter II, Section H.

¹⁰ D.21-06-015, Section 5, p. 102.

¹¹ Resolution M-4842, p. 5 (April 16, 2020).

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M333/K482/333482381.PDF>

PG&E believes that the obstacles to success outlined in previous reports will persist despite active and aggressive pursuit of the penetration rate goal established by D. 21-06-015.¹² Noted obstacles include:

- The small number of estimated eligible customers which makes effective targeting to the intended audience very difficult.
 - The CARE and FERA program mandate to include a shared application.
 - The small difference in income requirements between the two programs which make it likely that customers may inadvertently (or purposefully) estimate income within the range eligible for CARE discount.
- **Direct Mail and Email Marketing**

PG&E continued to execute quarterly, multi-touch targeted marketing campaigns using direct mail and email. The audience for the campaigns used a FERA-specific targeting model, which identifies customers likely eligible to enroll in the FERA program. Using the model, residential customers receive a score, with a score of one being the most likely to be to participate and a score of ten being less likely.

The campaigns used FERA focused messaging to the FERA audience segments. This approach was based on consistent results from message testing in 2019 and 2020 that showed enrollment rates for program-specific messaging were consistently higher for each audience segment than the combined CARE/FERA message.

PG&E also leveraged the results of messaging and direct mail package research conducted in late 2020 to develop test plans for 2021. The new “winning” creative message from the 2020 research was produced and used in acquisition campaigns over two consecutive quarters, with a 50/50 split between the FERA Control message and the FERA Test message (Figure 1).

Based on the research conducted in 2020, the winning creative version was designed to address a possible confusion point that the program name - Family Electric Rate Assistance – might imply that only families are eligible to participate. The creative used illustrations and content to highlight that different household types may be eligible for FERA, with specific language that roommates, families and blended family households are eligible to apply.

To demonstrate the ease of the process, the email headline and bullet points in the body copy highlight the expected time it takes to fill out the online application, and that applying does not require proof of income.

¹² D.21-06-015, OP 24.

Figure 1 – Sample of FERA Control and Test creative versions

CONTROL

No proof of income needed to apply to save 18% on electricity. [View this email as a web page »](#)

[Ver en español »](#)

Save 18% on your electricity bill. No proof of income needed to apply. [Apply now »](#)



It just takes 5 minutes to apply for the PG&E Family Electric Rate Assistance (FERA) program

It's so easy to save 18% on electricity by enrolling in the PG&E Family Electric Rate Assistance (FERA) program. Just check the simple chart below, and see if your household qualifies. No proof of income is required to apply, and it only takes 5 minutes online.

[Learn more »](#)

Check to see if your household income qualifies you to save with FERA

Qualifying Income Levels	
Household size	FERA
1-2	Not Eligible
3	\$43,441 - \$54,300
4	\$52,401 - \$65,500
5	\$61,361 - \$76,700
6	\$70,321 - \$87,900
7	\$79,281 - \$99,100
8	\$88,241 - \$110,300
9	\$97,201 - \$121,500
10	\$106,161 - \$132,700
For each additional person, add	\$8,960 - \$11,200

[Apply now »](#)



Financial assistance and support

If you are facing hardships, we offer additional support and relief for qualified customers to help you save money on bills.

[Get details »](#)



Difficulty paying your energy bill?

Apply now for up to \$1,000 in assistance through the Low-Income Home Energy Assistance Program (LIHEAP).

[Learn more »](#)

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TEST

Roommates and families. Learn how you can save 18% on electricity. [View this email as a web page »](#)

[Ver en español »](#)

Claim your 18% monthly electricity discount today [Apply now »](#)



Families, roommates, and blended households are eligible to apply

Qualifying Income Levels	
Household size	FERA
1-2	Not Eligible
3	\$43,441 - \$54,300
4	\$52,401 - \$65,500
5	\$61,361 - \$76,700
6	\$70,321 - \$87,900
7	\$79,281 - \$99,100
8	\$88,241 - \$110,300
9	\$97,201 - \$121,500
10	\$106,161 - \$132,700
For each additional person, add	\$8,960 - \$11,200

Your household may qualify to save 18% on electricity with the Family Electric Rate Assistance (FERA) program.

- Households of 3 or more people
- No proof of income is required to apply
- Applying online just takes 5 minutes

Check the income chart at left to see if your household qualifies. Your eligibility is based on current earnings of everyone living in your household as of the date you apply.

[Apply now »](#)

Questions? Email us at CAREandFERA@pge.com.



Financial assistance and support

If you are facing hardships, we offer additional support and relief for qualified customers to help you save money on bills.

[Get details »](#)



Difficulty paying your energy bill?

Apply now for up to \$1,000 in assistance through the Low-Income Home Energy Assistance program (LIHEAP).

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The Q2 Campaign results showed that the FERA Control message generated a statistically higher CARE enrollment rate across both the FERA Newly Eligible and Non-Responder audience segments (noted in Table 2 below).

Table 2 - CARE Enrollment by Audience and Creative Version

Audience Segment	Creative Version	# contacted	# enroll	% enroll
FERA Newly Eligible	FERA Only Control Message	101,483	1,518	1.50%
FERA Newly Eligible	FERA Only Test Message	101,489	1,377	1.36%
FERA Non-Responder	FERA Only Control Message	72,840	1,334	1.83%
FERA Non-Responder	FERA Only Test Message	72,844	1,197	1.64%

However, FERA enrollment rates were similar for both the Control and Test creative versions (Table 3 below).

Table 3 - FERA Enrollment by Audience and Creative Version

Audience Segment	Creative Version	# contacted	# enroll	% enroll
FERA Newly Eligible	FERA Only Control Message	101,483	298	0.29%
FERA Newly Eligible	FERA Only Test Message	101,489	284	0.28%
FERA Non-Responder	FERA Only Control Message	72,840	206	0.28%
FERA Non-Responder	FERA Only Test Message	72,844	187	0.26%

Results from early Q3 campaign analysis conducted in late October 2021 were consistent with the findings from Q2. Because the FERA Control message had a better CARE enrollment rate, the FERA Only Control Message is considered more efficient in terms of overall enrollments generated. Although the Test version did not outperform the Control version, PG&E believes there is merit to making the program guidelines clear and specific. PG&E plans to continue using the original Control message for acquisition campaigns in 2022, and will consider further message testing and creative optimization to address potential enrollment barriers.

For PG&E's territory, the CARE estimated eligible population is 90% of the total CARE and FERA estimated eligible population.¹³ In 2021, an average of 84% of the total enrollments from the FERA targeted campaigns were CARE enrollments. Even with audience selection via the model and FERA-specific messaging, campaign enrollments are expected to remain heavily weighted to CARE based on the target population size, since we are constrained to present both programs on a single application.

Although PG&E continues to see significantly more CARE enrollments resulting from the FERA direct marketing, campaign analysis shows that the FERA acquisition campaigns have a positive impact on driving enrollment, though at a much slower rate than needed to achieve the 50% penetration rate

¹³ Athens CARE and FERA eligibility estimates for 2021: FERA - 152,625 and CARE - 1,447,571.

by 2023. When comparing the enrollment rates for customers who received the FERA acquisition communications versus the No Mail Control customers who do not receive the communications, there is an increase in enrollment rates (or “lift”) for those who receive marketing (the lift is discussed further in the section below).

There were no FERA Failed to Recertify (FTR) acquisition campaigns executed in 2021 since the recertification requirement remained on hold until July 2021 as part of the emergency customer protections. The first customers who fail to recertify began at the end of October 2021, so PG&E plans to resume marketing to the FTR segment in 2022 with the first outreach campaign expected to launch during Q1.

- **Targeting optimization - New FERA Model Development and Launch**

PG&E has used three targeting approaches for FERA Acquisition outreach from 2019 to 2021.

- 1) PG&E began FERA targeted outreach in 2019 using the CARE model with third party data variables (Household Size and Income) overlaid to attempt to select for FERA eligible customers. The resulting audience size was very small (only about 16K customers for targeted marketing). PG&E determined that to meet the substantial enrollment increase required to meet the directed penetration rate goal, it was necessary to refine the model and identify more potential FERA customers.
- 2) PG&E worked with a vendor to develop an initial FERA propensity model in November of 2019. The model was used in Q1 2020 to select a target audience of customers likely to be eligible for FERA for use in for direct marketing. However, the onset of the COVID-19 pandemic necessitated adjustments to the targeting strategy because more customers were now presumed to be eligible. Use of the propensity model was put on hold while targeting parameters were broadened to reach more non-enrolled customers across PG&E’s territory.
- 3) In March 2021, PG&E began to rebuild both the CARE and FERA propensity models to identify PG&E customers with higher likelihood to be eligible and enroll in each program. Several factors drove the decision to begin rebuilding the models, including economic changes from the COVID-19 pandemic and subsequent enrollment increases, indicators of model degradation and the desire to include additional predictive variables. PG&E leveraged the customer database, website activity on pge.com, and other external sources (such as unemployment data) to create a modeling universe with data from 2020 and 2021.

After creating the model universe, the initial set of approximately 300 variables was reduced to 30 variables that were included in the model building

process. Several different model candidates were created, with each model version using the same set of customer data but different modeling techniques. The performance of each model candidate was compared to the current model, looking at the predictive accuracy and a 'Champion' model was selected for FERA. Variables such as tenure, payment types, eligibility rates from Athens, and ethnicity were among those with the highest predictive power for enrollments.

Compared to the previous model, the new model showed a significant improvement for FERA enrollments occurring in the top deciles. The overall enrollment rate seen in Decile one was twice as high for the new model versus the previous version.

As discussed in the section above, FERA marketing campaigns successfully drive incremental enrollments. The acquisition models are an important tool for more effective targeting and efficiency of the campaigns, especially when seeking to find the small number of FERA eligible customers within the much larger CARE-eligible population.

When PG&E compares increased FERA enrollment rates for campaigns executed using the 2019-developed FERA propensity model in Q1 and Q2 to the version developed in 2021 and tested in Q3, there is a significant increase in the lift with the new model. The Q1 and Q2 campaign enrollment rate lift for marketing recipients versus non-recipients was about 200%. When the new model was applied for the Q3 campaign, the lift of a FERA recipient versus non-recipient for FERA enrollments was about 333%.

PG&E plans to complete analysis to compare the FERA direct marketing campaign enrollment rates across 2019, 2020 and 2021 and submit a Tier 2 Advice Letter that complies with D.21-06-015.¹⁴ As indicated above, the early results for the Q3 2021 campaign highlight that the 2021 model produces higher enrollment rates than either the CARE model appended with additional date or the 2019 iteration of the PG&E FERA propensity model.

- **Digital Advertising**

In 2021, PG&E deployed a digital media campaign for FERA with multiple layers of paid digital media efforts including search, Gmail ads, video, display and native (contextual) advertising that is always-on throughout the year. Creative is developed in both Spanish and English.

The FERA digital campaign spend was increased as a total portion of the overall CARE FERA media spend, from approximately 20% of total media plan to 35%. The base media buy was territory-wide but PG&E continued to include a layer of increased spending in select zip codes as part of the

¹⁴ D.21-06-015, p. 103.

strategy to increase awareness with Hard-to-Reach customers. Zip codes were identified as Hard-to-Reach based on lower CARE and FERA penetration rates, and those that were in designated rural and/or high poverty areas.¹⁵

Based on strong performance in 2020, PG&E continued advertisements on the Fresh EBT mobile application (in English and Spanish language) which allows customers to instantly check their EBT balance, clip online coupons, and explore job posts and other money-making activities making it the ideal environment to promote CARE and FERA.

In Q3, the Fresh EBT ad creative was updated, and PG&E tested a new ad format, called an Explainer page (Figure 2 below). A sub-link on the FERA display ad opens an in-app page which provides additional information about the FERA program eligibility and benefit to the customer. Fresh EBT display and the new Explainer page showed strong performance with a click-through rate (CTR) of 1.13% for the display ad. Although the impressions delivered for the new Explainer page was relatively small (515 views), the Explainer page CTR was over 59%.

¹⁵ A High Poverty household has income at or below 100% of the Federal Poverty Level Guidelines. Rural areas are generally defined as those isolated from larger metropolitan areas, by distance or other physical features. PG&E has identified specific zip codes and counties within PG&E's territory that fall within these definitions for targeting purposes. The 2021 Hard-to-Reach zip code targeting list included 227 (out of 1,001) prioritized zip codes which capture most of the CARE eligible, non-enrolled, FERA eligible, non-enrolled, Rural and High Poverty customers.

Figure 2 – Fresh EBT Display Ad and Explainer Page example

Display Ad

Save 18% on electricity bills

Save on electricity
Three or more in your household? Save with FERA.

PG&E

LEARN MORE

Explainer Page

PG&E

Save 18% on electricity

Save with FERA

You can save on your electricity bill every month by enrolling in the Family Electric Rate Assistance (FERA) program. This is a great time to join the 1.6 million Californians saving money right now with programs like FERA.

How to qualify: total household income

You qualify for the discount by meeting income guidelines. Add up the current total income of everyone in your household.

Many kinds of households are eligible for FERA

- Must be a household of three or more people
- Members of the household don't need to be related
- Family members, non-related roommates, and blended households qualify

Applying is easy

It only takes about five minutes to fill out an application online. Find your account and meter ID numbers on your bill to apply.

APPLY NOW

PG&E also continued Google Discovery Ads, a tactic to help reach newly eligible FERA customers because it uses past behavior to serve up relevant content and ads. For example, if customers are searching for things like “unemployment claims”, “government checks”, “can’t pay my bills”, they could be served with a CARE/FERA ad.

Through the first nine months of 2021, the digital campaign is pacing to achieve established annual goals and surpass 2020’s click-through rate. The digital campaign delivered over 99 million impressions through September, and although overall CARE/FERA landing page visits were down versus 2020, the cost per landing page visit was on par with 2020 results.

- **Multicultural Media Campaign**

In 2021, insights from the updates to the 2020 PG&E CARE and FERA customer profiles led to refinements in the multicultural campaign strategy.

PG&E expanded multicultural marketing efforts to drive awareness with additional multilingual tactics, prioritizing prevalent Asian languages in PG&E's territory.

PG&E continued to promote rate assistance programs to income qualified customers via display ads, paid search and Google discovery ads in Spanish, Korean, Chinese, Vietnamese and Russian. The display ads ran throughout 2021, with search and Google ads running January through September.

Print advertising was added to the campaign in 2021, placed in publications with an estimated circulation of over 1.5 million. The print ads targeted audiences in Chinese, Korean, Vietnamese and Russian. PG&E also included TV interviews on stations with programming in Chinese, Korean, Tagalog, and Vietnamese. Finally, digital video ads in Chinese, Korean and Vietnamese were added to the campaign and ran over a period of approximately 12 weeks.

The full year results will be reviewed in early 2022, but through September the digital portion of the multicultural campaign generated almost 120 million impressions, with over 82,000 clicks and 103,000 landing page visits.

- **Hard-to-Reach Customer Media Campaign**

A coordinated awareness media campaign focused on hard-to-reach audiences continued through 2021. The campaign included digital radio and video, TV interviews and home-delivered print. As described above for the digital ad campaign, zip code targeting was used to identify key areas of opportunity for increased program enrollment looking at areas of sizeable numbers of estimated unenrolled CARE and FERA customers, high poverty and rural zips.

The zip-targeted digital media tactics delivered a total of approximately 52 million paid impressions and more than 350,000 clicks through September. Print tactics were distributed to a total of 2.9 million households. Digital radio enabled targeting in the Hard-to-Reach zip codes.

- **CARE/FERA Landing Page**

Throughout 2021, PG&E leveraged www.pge.com/carefera to engage with customers; highlighting information about respective program tips and tools to support their energy management journey. This page presents program requirements, key program differences and prominently links to the dual application form for CARE and FERA. Online enrollments accounted for 72% of the total 2021 FERA new enrollments through November.

The CARE/FERA landing page also highlights important alerts and updates to Customer Protections information and links customers to pages where they can find additional information about other programs, financial assistance and support.

- **Bill Inserts**

Enrollments attributed to bill inserts shows some decline as the number of customers who receive electronic bills increases. PG&E continues to use combined program messaging for bill inserts where targeting capabilities are limited.

The CARE/FERA application was inserted in the bill package five times throughout the year to all non-CARE/FERA enrolled residential customers who receive a paper bill. The June insert including the updated income guidelines for CARE and FERA was sent to approximately 2.2 million non-CARE/FERA customers. Bill inserts delivered 315 FERA enrollments through November.

- **PG&E Earned Media and Owned Assets**

PG&E continued to deploy an income qualified targeted email newsletter to approximately 1.6 million residential customers. CARE and FERA were featured in the June issue and the November issue specifically promoted FERA.

PG&E promoted CARE and FERA in the Home Energy Reports throughout the year. CARE and FERA were promoted in July and FERA in October for the electronic version of the Home Energy Reports (eHERs). The print version promoted FERA in March-April and CARE and FERA July-August. Customers receiving the quarterly Home Energy Report saw a CARE/FERA promotion during April-May.

PG&E participates in media interviews throughout the territory and distributes press releases throughout the year to promote CARE and FERA. Between February and November several release topics reminded customers of the ongoing support available to help with the COVID-19 Pandemic impact and support through the transition as some Customer Protections ended in 2021. Interviews and articles highlight CARE and FERA programs as part of the COVID-19 customer support, including how CARE and FERA participants may be eligible for past due bill payment plans, and a way to help customers lower future bills.

III. Outreach

- **Outbound Financial Assistance**

In May 2020, PG&E stood up a new outbound calling campaign in order to reach customers with past due amounts. The outbound calls provided customers with flexible pay plans as well as information about CARE, FERA, Medical Baseline, and other agency assistance programs. Customers who were deemed to be eligible for a specific program were enrolled. Final annual data for 2021 will be reported in the FERA Annual Report, to be filed in May 2022.

The campaign information is only through November 2021 and it consisted of customers, Customer Service Representatives (CSRs) were able to make contact with directly. The customers who could not be reached received a voicemail with information regarding financial assistance programs.

The campaign was also successful in identifying over \$12M in potential savings from better rate options. Customers with a past due balance were directed to Low Income Home Energy Assistance Program (LIHEAP) where they received pledges totaling \$238,572 or enrolled in Arrearage Management Plan (AMP) where eligible.

Table 4: Outbound Campaigns for Financial Challenged Customers from January, 2021 - November 30, 2021

	Totals
Number of Customers Reviewed	249,479
Number of Customers Called	60,666
Enrolled in CARE	4,058
Enrolled in FERA	119
LIHEAP Pledge Amounts	\$238,572
Savings from Completed Rate Changes	\$12,069,442

- **Community-Based Organization (CBO)**

PG&E utilizes its broad network of Community-based organization (CBO) partners to conduct outreach for FERA and other assistance programs available to customers. These organizations play an important role in helping PG&E communicate about the availability of various assistance programs like FERA to our customers. While PG&E's current CBO network has broad geographic coverage, PG&E continues to focus on increasing its partnerships with CBOs based in the Central Valley region. While the pandemic continues to impact some CBO operations, most have resumed in-person activities. PG&E created a toolkit, including a fact sheet, social media guides, and newsletter content for the CBOs to use in their outreach efforts.

CBOs utilized social media, newsletters, direct mail, one-on-one meetings in offices, in-person events, and food box distributions to distribute information about FERA and other available program to customers.

In Q3, PG&E added a capitation fee for FERA enrollments to its Community Outreach Contractor (COC) program and for ESA contractors.

Furthermore, in Q2, Q3 and Q4, PG&E entered into new paid agreements with CBOs. These paid agreements were made with sixteen CBOs (including 4 additional affiliate office locations, and 9 CBOs based in the Central Valley region) for marketing, education, and outreach work related to the phase out of COVID-19 emergency protections. In Q4, PG&E extended its agreements in a “Phase 2” of the project with fourteen CBOs (including 5 CBOs based in the Central Valley) to ensure our partners continue to amplify these important messages throughout Q1 2022. Each of these CBOs attended multiple onboarding trainings and workshops, hosted remotely due to COVID-19 restrictions.

PG&E continued to engage with existing CBOs as well as new ones and encourage them to participate in a Request for Proposal (RFP)¹⁶ opportunity to continue providing marketing, education, and outreach on FERA and other programs. The ME&O efforts will be targeting “hard-to-reach” populations across the utility’s service territory, including rural, tribal, indigenous, language-isolated, geographically-isolated, disadvantaged communities (DACs), environmental and social justice communities, and populations which face barriers to access. Via this RFP process, PG&E aims to increase its CBO partnerships with health-based organizations, organizations serving tribal members, as well as continue to focus on broad geographic coverage and ensuring diverse CBOs are active partners throughout the Central Valley region.

IV. FERA Retention Campaigns

Retention campaigns were paused as Emergency Customer Protections were put in place to support customers during the COVID-19 pandemic.¹⁷ PG&E started retention campaigns in July 2021, when certain customer protections were discontinued and recertifications resumed.

PG&E’s FERA retention outreach focuses on reducing attrition through failure to recertify for the program. FERA-enrolled customers are required to recertify their eligibility every two years (every four years for those on a fixed income). PG&E

¹⁶ RFP 127674, “Community-Based Organization (CBO) Marketing, Education, and Outreach (ME&O) Services for Income-Qualified, Electric Vehicle, Workforce Education & Training, and/or Microgrid Initiatives,” is expected to be executed in Q1 2022.

¹⁷ Resolution M-4842, Emergency Authorization and Order Directing Utilities to Implement Emergency COVID-19 Protections.

restarted the monthly auto-recertification campaign in Q3 2021, automatically recertifying customers in Deciles 1 and 2.¹⁸ PG&E sent these customers email notification to alert them that they were automatically re-enrolled in the FERA Program and no further action was required to continue to receive the FERA discount. The email indicated that the customer could opt-out of the program if they are no longer qualified.

As part of the campaign, PG&E deployed the FERA recertification reminders to customers in deciles 3-10. The campaign mirrors the approach that has been in place for CARE since 2015. Customers with a valid email received email reminders at 120-days, 90-days, 60-days and 30-days prior to the recertification date with a call-to-action to re-enroll before their program end date. Additionally, a direct mail letter and application were sent at the 90-day mark to all customers due to recertify.

Conclusion

In conclusion, this letter contains the 2021 FERA results as is required by D.18-08-013, issued on August 17, 2018

Protests

This is an information-only AL submittal. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this AL and is not subject to protest. Instead, PG&E is reporting progress to increase FERA program enrollment.

Effective Date

PG&E requests that this information-only advice letter become effective upon date of submittal, which is **December 15, 2021**.

Notice

In accordance with General Order 96-B, Section IV, a copy of this AL is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for **A.16-06-013**, **A.14-11-007 et al.**, and **A.19-11-003 et al.** 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. AL submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

¹⁸ The FERA propensity model assigns customers a Decile score from 1 to 10, with 1 being the most-likely to be FERA-eligible and 10 being the least likely to be FERA-eligible. CARE and FERA auto-recertification is executed for Deciles 1-2.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

cc: Service Lists in A.16-06-013, A.14-11-007 et al., and A.19-11-003 et al.



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 (U 39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 6434-E

Tier Designation:

Subject of AL: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013

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.18-08-013

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: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date: 12/15/21

No. of tariff sheets: 0

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