

PUBLIC UTILITIES COMMISSION
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Pacific Gas & Electric Company
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Subject: Pacific Gas and Electric Company's Proposed Percentage of Income Payment Plan Pilot
in Compliance with D.21-10-012

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February 04, 2022

Advice 4569-G/6493-E

(Pacific Gas and Electric Company U 39 M)

Advice 31-E

(Central Coast Community Energy)

Advice 36-E

(East Bay Community Energy)

Advice 59-E

(Marin Clean Energy)

Advice 10-E

(Pioneer Community Energy)

Advice RCEA-014-E

(Redwood Coast Energy Authority)

Advice 12-E

(Valley Clean Energy Alliance)

Public Utilities Commission of the State of California

**Subject: Pacific Gas and Electric Company's Proposed Percentage of Income
Payment Plan Pilot in Compliance with D.21-10-012**

Purpose

In accordance with Ordering Paragraph (OP) 2 of Decision (D.) 21-10-012 (PIPP Decision), Pacific Gas and Electric Company (PG&E) hereby jointly¹ submits to the California Public Utilities Commission (CPUC or Commission) this Tier 3 advice letter proposing a Percentage of Income Payment Plan (PIPP) Pilot. Final proposed tariff sheets for new supporting gas and electric balancing accounts and memorandum accounts are presented in Attachment 1. Pro forma proposed tariff sheets for new supporting PIPP gas and electric rates schedules and rules are presented in Attachment 2.

¹ As required by OP 3, each participating Community Choice Aggregator (CCA) that has served notice to PG&E and the service list must jointly file their Tier 3 advice letter with PG&E.

Background

Rulemaking (R.) 18-07-005 was opened in 2018 to “adopt rules and policies to reduce disconnections and improve reconnection processes and outcomes for disconnected customers.” Within that Rulemaking, D.20-06-003 established a ratesetting phase of the proceeding to consider a PIPP program. The PIPP Decision then adopted a PIPP pilot and concluded the PIPP phase of the proceeding; OP 2 and “Attachment A” of this decision ordered PG&E to submit a Tier 3 advice letter proposing various implementation details for PIPP.

This advice letter is structured around the requirements in the PIPP Decision, which requires discussion of the following topics:

- Eligibility and zip codes with the highest rates of recurring disconnections (Attachment A, Section 3.b);
- Community Choice Aggregation (CCA) participation caps, eligible zip codes, marketing, education, and outreach (ME&O) plans, and proposed budgets (Attachment A, Section 5.d);
- Splits of electric and gas bill caps (Attachment A, Section 8.c);
- An ME&O plan (Attachment A, Section 11);
- A cost recovery plan for CCAs (Attachment A, Section 5.b); and
- Establishment of balancing and memorandum accounts (Attachment A, Section 12).

To support the creation of this Tier 3 advice letter, PG&E, in collaboration with the other investor-owned utilities (IOUs)², has presented aspects of its PIPP pilot design at four PIPP working group meetings³ and two Low-Income Oversight Board meetings.⁴ Each presentation provided insight on PG&E’s proposed approach while soliciting stakeholder feedback. Where possible, PG&E has reflected this feedback in its proposal.⁵

² IOUs included in the collaboration were Pacific Gas & Electric, San Diego Gas & Electric, Southern California Edison and Southern California Gas.

³ The PIPP Working Group met on the 6th and 20th of December in 2021, and 10th and 24th of January in 2022. Each presentation was serviced to the service lists.

⁴ The PIPP pilot was presented and discussed on December 15, 2021 and January 11, 2022.

⁵ For example, PG&E received consensus from The Utility Reform Network (TURN) and MCE that a statewide bill cap split ratio of 75/25 (electric/gas) charges is preferred. This proposal is explained in more detail in Section C below.

Discussion

A. Proposed Eligibility Rules

The PIPP Decision establishes a cap of 5,000 PG&E participants in PIPP; it also specifies that any customers “enrolled in the California Alternate Rates for Energy (CARE) program and who either (i) are located in one of the zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium, or (ii) have been disconnected 2 or more times during the 12 months prior to the disconnections moratorium” are eligible for PIPP.”⁶ Further, the PIPP Decision requires the IOUs to propose “eligible zip codes with the highest rates of recurring disconnections based on utility data, with a sufficient number of CARE-eligible customers for utilities to meet target enrollment levels within 6 months after pilot enrollment begins.”⁷

Based on these provisions in the PIPP Decision, there are several orders of magnitude between the number of PIPP-eligible customers, and the number of spots that PIPP can support. PG&E’s first concern in developing this implementation plan was to assess eligibility rules that can meet target enrollment levels and facilitate a robust evaluation.

i. Core Transportation Agent customers

While the PIPP Decision provides direction around CCA participation, it does not specifically address Core Transportation Agent (CTA) customers. CTA customers are similar to customers of a Direct Access (DA) or a CCA, but for the gas instead of electric commodity. Since CTAs function similarly to CCAs, it would follow that they would have similar requirements as CCAs – namely, in order to participate in the PIPP proceeding, the CTA would need to file an intent to participate in the PIPP pilot – and no CTA did so. This is a reasonable criterion for a small pilot and can be revisited if PIPP scales to a full program.

ii. Budget Billing customers

The PIPP Decision does not specifically address Budget Billing customers.⁸ PG&E proposes to exclude customers enrolled in Budget Billing from PIPP because Budget Billing customers are not the population of customers targeted for assistance from the

⁶ PIPP Decision, Attachment A, Sections 2 and 3.a

⁷ PIPP Decision, Attachment A, Section 3.b

⁸ PG&E’s Budget Billing program is a payment assistance program that helps normalize customer bills by averaging out costs over a rolling 12-month period. Each month, Budget Billing customers are only required to pay the specified Budget Billing amount (instead of their actual energy costs), and the required Budget Billing amount is adjusted up to 3 times a calendar year so that the customer does not ultimately overpay or underpay continuously. More importantly, to remain enrolled in this free program, customers must make timely payments and not have any sustained arrearages.

PIPP program (e.g. those who are struggling to make on-time payments) because only customers with a history of timely payments are eligible for Budget Billing. In other words, Budget Billing customers have a lower risk of being disconnected compared to customers not enrolled in Budget Billing, and thus should not be included in the pilot. In addition, Budget Billing customers already experience a fixed bill (though subject to period adjustment), which would complicate the PIPP evaluation which intends to examine the effect of a fixed bill.

iii. Eligible zip codes

PG&E proposes the following list of eligible zip codes pursuant to Attachment A, Section 3.b. To arrive at this list of eligible zip codes, PG&E first identified the total number of CARE disconnections that occurred between March 2019 and February 2020,⁹ then identified the top twenty zip codes that had the highest number of total disconnections. The total number of CARE customers residing in the proposed zip codes, prior to applying any exclusions as defined in Attachment A or the additional exclusions described above, is approximately 241,533.

To arrive at an estimated¹⁰ number of eligible CARE customers in each zip code, PG&E reviewed 12 months of CARE customer billing data of customers who were billed through September 2021 and then took the following steps per Attachment A, Sections 3.c and 3.e:

1. Removed customers on master-metered rates, direct access customers, customers who do not have a SmartMeter, customers who are currently billed through PG&E's Advanced Billing System, customers who are enrolled in any other pilot, and customers enrolled in net energy metering rates.¹¹
2. Removed customers who were not enrolled in electric rates E-1, E-TOU-C, EV2-A, and gas rate G-1¹²
3. Removed CTA and Budget Billing customers.

PG&E will seek to include in the PIPP Pilot customers in the zip codes in Table 1. The final composition of the PIPP Pilot participants will be subject to eligible customer response, which may be influenced by the Community-Based Organization (CBO) selected to assist with implementation of the pilot.

⁹ PG&E did not complete any disconnections beginning January 1, 2020 so the effective date of analysis is only to December 31, 2019.

¹⁰ PG&E notes that customer data is dynamic and may differ slightly by the time that Marketing, Education, and Outreach for the PIPP pilot begins. At this time, PG&E estimates over 200,000 CARE customers within the top 20 zip codes would be eligible to participate.

¹¹ Attachment A, Section 3.c.

¹² "Utilities may limit pilot participation to customers enrolled in the most commonly enrolled residential rates." (Attachment A, Section 3.e.)

Table 1: PG&E's Proposed Eligible Zip Codes (Top 20)

ZIP Code¹³	City Name	County Name	Estimated Number of Eligible CARE Customers	Served by a CCA
93304	BAKERSFIELD	KERN	10,213	
93305	BAKERSFIELD	KERN	7,214	
93306	BAKERSFIELD	KERN	10,752	
93307	BAKERSFIELD	KERN	15,369	
93308	BAKERSFIELD	KERN	8,991	
93309	BAKERSFIELD	KERN	10,787	MCE
93458	SANTA MARIA	SANTA BARBARA	7,795	CCCE
93702	FRESNO	FRESNO	8,731	
93705	FRESNO	FRESNO	7,212	
93706	FRESNO	FRESNO	6,749	
93722	FRESNO	FRESNO	24,198	
93726	FRESNO	FRESNO	17,266	
93727	FRESNO	FRESNO	11,051	
94509	ANTIOCH	CONTRA COSTA	9,336	
94533	FAIRFIELD	SOLANO	9,126	MCE
94565	PITTSBURG	CONTRA COSTA	12,722	MCE
94590	VALLEJO	SOLANO	6,257	MCE
95205	STOCKTON	SAN JOAQUIN	6,899	
95206	STOCKTON	SAN JOAQUIN	9,827	MCE
95207	STOCKTON	SAN JOAQUIN	8,806	
Total Estimated Eligible CARE Customers			209, 301	

B. CCA Participation & Pilot Participation Targets

As shown in Table 1 above, PG&E's proposed zip codes do not have representation from each participating CCA. Consistent with Attachment A, Section 5, participating CCAs will need to propose their own zip codes. Attachment A, Section 5, requires participating CCAs to propose a target enrollment level, eligible high recurring disconnection zip codes, a marketing, education, and outreach plan, and a proposed budget;¹⁴ it also allows participating CCAs to "propose eligible high recurring disconnection rate zip codes within

¹³ PG&E estimates that 12 of the 20 proposed zip codes include the census tracts that meet the Commission's criteria for electric or gas affordability areas of concern (AAC) as proposed in R.18-07-006. These zip codes are 93304, 93305, 93306, 93307, 93702, 93705, 93706, 93722, 93726, 93727, 95205, 95206. For more information, see "Affordability Metrics Implementation Staff Proposal," November 5, 2021, Appendix A.

¹⁴ Attachment A, Section 5.d.

the CCA's service territory regardless of whether the utility proposes the same high recurring disconnection rate zip codes."¹⁵

PG&E has collaborated with each participating CCA to provide customer-level data within each CCA's top 6 disconnection zip codes and additional disconnection zip code data at the CCA's request to support each CCA's proposal. The resulting proposal from each participating CCA, including each CCA's selected target zip codes, is included in Appendix A of this advice letter. Appendix A includes Central Coast Community Energy, East Bay Community Energy, Marin Clean Energy, Pioneer Community Energy, Redwood Coast Energy Authority, and Valley Clean Energy Alliance.

Additionally, Attachment A, Section 5, sets the CCA pilot participation target as (1) being proportional to the utility's participation cap (based on the CCA's projected share of customers in the utility's service territory) and (2) part of the utility's participation cap.¹⁶ To determine how to allocate PG&E's pilot participation cap of 5,000 customers between bundled PG&E customers and unbundled CCA customers, PG&E took the following steps:

1. Identified the individual CCA participation cap by developing the ratio of total CARE CCA residential customers against total CARE bundled residential customers for that CCA
2. Applied that ratio to the total 5,000 participation cap allotted to PG&E's territory to confirm each CCAs' respective participation target
3. Subtracted the total number of unbundled customers from the total participation cap of 5,000 to confirm the participation cap for bundled customers

The results of this methodology are found in Table 2.

¹⁵ Attachment A, Section 5.f.

¹⁶ Attachment A, Section 5.e.

Table 2: Pilot Participation Targets of Bundled and Unbundled Customers

Customer Group	Total # of CARE Customers ¹⁷	Ratio of CARE CCA to PG&E Bundled CARE Customers	CCA PIPP Participation Cap
Total CARE Bundled	897,458		
Central Coast Community Energy (3CE)	92,373	10%	515
East Bay Community Energy (EBCE)	126,125	14%	703
MCE	105,299	12%	587
Pioneer Community Energy (PIO)	13,477	2%	76
Redwood Coast Energy Authority (RCEA)	16,556	2%	93
Valley Clean Energy (VCE)	13,078	1%	73
PIPP Pilot Summary			
Total CCA (Unbundled) Participation Target	2,047		
Total PG&E Bundled Participation Target	2,953		
Total PIPP Pilot Participation	5,000		

C. Electric and Gas Bill Caps

D.21-10-012 approved the following methodology for developing two standardized bill caps (see Table 3):

1. Utilize the most current reference income from the Federal Poverty Guidelines (FPG) of 50% and 150%
2. Identify the monthly income for a household size of 3 people
3. Cap the resulting amount by 4% and round up to the nearest dollar

Table 3: Result of Methodology Approved in D.21-10-012¹⁸

	Customers with incomes between 0-100% FPG	Customers with incomes between 101-200% FPG
Reference income	50% of FPG	150% of FPG
Monthly income for household of 3	\$905	\$2,745
Cap based on 4% of monthly income	\$37*	\$109*

Attachment A, Section 8 requires the development of separate bill caps for electric and gas service¹⁹, and indirectly requires a further splitting of the electric charges for CCA customers between PG&E charges and CCA charges. In compliance with section 8.d., PG&E first provides the results of its Electric to Gas split analysis in Table 4, followed by its analysis of the split of PG&E charges and CCA charges in Table 5. Moreover, PG&E

¹⁷ Analysis completed as of 11/29/21 and is a snapshot in time.

¹⁸ These resulting bill caps are derived using the 2021 Federal Poverty Guidelines.

¹⁹ Attachment A, Section 8.d.

provides a subsequent discussion on its recommendation that instead of implementation based on Tables 4 and 5, the Commission should adopt a statewide allocation to be utilized by all the investor-owned utilities (IOUs), which is reflected in Table 6. Table 7 presents the proposed CCA generation versus non-generation electric PIPP bill split.²⁰

The following methodology was applied to arrive at the bill caps shown in Table 4:

1. Reviewed the underlying customer data from Table 1 above
2. Averaged the annualized CARE bills in three climate categories (as defined by the baseline territory that the CARE customer lived in)
3. Rounded the commodity caps in favor of customer understanding and experience

Table 4: CARE Electric & Gas Bill Caps

Climate Zones	Moderate ²¹	Hot ²²	Moderate & Hot ²³
Ratio of Bill Charges (Electric/Gas)	55/45	73/27	72/28
0-100% of FPG PIPP Cap	\$37.00	\$37.00	\$37.00
Electric Bill Cap	\$21.00	\$27.00	\$27.00
Gas Bill Cap	\$16.00	\$10.00	\$10.00
101-200% of FPG PIPP Cap	\$109	\$109	\$109
Electric Bill Cap	\$60.00	\$79.00	\$78.00
Gas Bill Cap	\$49.00	\$30.00	\$31.00

Second, the following methodology was applied to arrive at the ratio of bill charges between PG&E and CCAs:

1. Averaged the annualized costs of CARE bills in zip codes serviced by CCAs (as defined by the baseline territory that the CARE customer lived in) from Table 1
2. Proportionally split costs by generation and non-generation costs for electric commodity caps of \$27.00 & \$78.00 (the result of the electric cap for the "Moderate & Hot" climate column in Table 3)
3. Rounded the splits in order to make the percentages more understandable to customers

²⁰ This split is specific to PG&E's territory

²¹ Hot – PG&E defines this as customers living in baseline territories R, S, and W; which generally covers customers living in the Valley and/or Desert/Mountain.

²² Moderate – PG&E defines this as customers living in baseline territory X; which generally covers customers living in the Valley and/or Hills.

²³ Moderate & Hot – This population is a result of combining the customers in the Moderate and Hot climates.

Table 5: Generation and Non-Generation Costs for Electric Bill Caps

Climate Zones²⁴	Moderate	Hot	Moderate & Hot
Ratio of Electric Charges (Generation/Non-Generation)	35/65	39/61	38/62
Electric Bill Cap	\$27.00	\$27.00	\$27.00
Electric Generation Cap (CCA Charges)	\$9.00	\$11.00	\$10.00
Electric Non-Generation Cap (PG&E Charges)	\$18.00	\$16.00	\$17.00
Electric Bill Cap	\$78.00	\$78.00	\$78.00
Electric Generation Cap (CCA Charges)	\$27.00	\$30.00	\$30.00
Electric Non-Generation Cap (PG&E Charges)	\$51.00	\$48.00	\$48.00

Discussion

PG&E's initial proposal for the PIPP pilot was to utilize the bill caps that were produced as a result of combining the Moderate & Hot climates. This would have resulted in:

- a bill (electric/gas) split of \$27/\$10 and \$78/\$31 (for the \$37 and \$109 caps, respectively), and
- a Generation/Non-Generation (CCA/PG&E) split of \$10/\$17 and \$29/\$49 (for the \$37 and \$109 overall caps, and \$27 and \$78 electric caps, respectively)

However, after further discussions with the IOUs and the PIPP Working Group,²⁵ PG&E recommends that the Commission instead adopt a statewide bill cap ratio of 75/25 (electric/gas) as shown in Table 6 for three reasons. First, when reviewing the analysis of CARE customers within each IOU's territory, it became apparent that the electric/gas commodity split was fairly similar, where 2-3% difference does not have meaningful or material impact on the overall subsidy.²⁶ Second, it is possible for a CARE customer to be served by two separate IOUs (one for gas and for electric), which would result in a confusing customer experience if there were differing bill caps for different customers

²⁴ PG&E completed additional analyses for Cool, Cool & Moderate (combined), and Cool & Moderate & Hot (combined) climates and presented the findings in the third PIPP Working Group on January 10, 2022. With the exception of the Cool climate, the Generation/Non-Generation split had minor differences of only 1%.

²⁵ This idea was first presented in the third PIPP Working Group meeting on January 10, 2022.

²⁶ PG&E's analysis for Hot & Moderate climate has a ratio of 72/28, resulting in caps of \$27/\$10 (electric/gas). If PG&E were to utilize the 75/25 ratio instead (with rounding), it would result in a cap of \$28/\$9, which is a change of only \$1, and \$82/\$27, which is a change of only \$4.

based on whether they were a single or dual commodity customer. Third, adopting the 75/25 ratio approach would mirror the existing process of the CARE guidelines, which are set statewide rather than specific to each IOU. Thus, for the purposes of the PIPP pilot, a single statewide bill cap ratio of 75/25 is sufficient until further customer data can inform an alternative approach (if applicable).

Table 6: Statewide IOU CARE Electric & Gas Bill Splits

Ratio of Bill Charges (Electric/Gas)	75/25	Recommended (75.68/24.32)
0-100% of FPG PIPP Cap	\$37.00	\$37.00
Electric Bill Cap	\$27.75	\$28.00
Gas Bill Cap	\$9.25	\$9.00
101-200% of FPG PIPP Cap	\$109.00	\$109.00
Electric Bill Cap	\$81.75	\$82.00
Gas Bill Cap	\$27.25	\$27.00

Furthermore, in Table 7 below, PG&E revises Table 5 to utilize the proposed 38/62 ratio (generation/non-generation) with the statewide electric capped charges of \$28 and \$82.

Table 7: PG&E's Generation and Non-Generation Costs for Electric Bill Cap

Climate Zones	Moderate & Hot
Ratio of Electric Charges (Generation/Non-Generation)	38/62
0-100% of FPG Electric Bill Cap	\$28.00
Electric Generation Cap (CCA Charges)	\$11.00
Electric Non-Generation Cap (PG&E Charges)	\$17.00
101-200% of FPG Electric Bill Cap	\$82.00
Electric Generation Cap (CCA Charges)	\$31.00
Electric Non-Generation Cap (PG&E Charges)	\$51.00

Updating Bill Caps to align with CARE Program Guidelines

Attachment A, Section 8, also requires that the bill caps be updated annually “to reflect current income guidelines, concurrently with CARE program income guideline updates, provided that bill caps will not be adjusted during the first six months after the pilots are

launched.²⁷ The PIPP pilot may launch before the new CARE guidelines are updated for 2022-2023 on June 1. However, if the PIPP pilot starts after June 1, 2022, PG&E plans to develop the corresponding bill caps that (1) utilize the June 1, 2022 CARE program guidelines and (2) round the bill caps in a manner consistent with customer experience and understanding.

PG&E notes that the bill caps provided in this filing (including Schedule E-PIPP and G-PIPP) are illustrative based on the June 2021 currently effective CARE program income guidelines. Upon approval of this advice letter, PG&E will file a subsequent Tier 1 advice letter to reflect the appropriate bill caps based on the updated June 2022 CARE income guidelines.

D. Marketing, Education, and Outreach, and CBO Participation

PG&E's Marketing, Education, and Outreach (ME&O) goal is to achieve at least the target enrollment of 2,500 participants without exceeding the maximum of 5,000 participants, and at the same time minimize the number of PIPP-eligible customers that might undergo the negative experience of expressing interest in the pilot only to be turned away because the maximum participation limit has been reached. As discussed previously, there are significantly more eligible customers than the pilot can support – only 2-3% of eligible customers can be enrolled in PIPP.²⁸ To most effectively deliver at or on the acquisition goal while also minimizing a potentially negative customer experience of turning away interested customers, PG&E plans to conduct targeted marketing in waves while closely monitoring the response rates to reduce risk of over-enrollment. PG&E plans to remain flexible as to which marketing channels to ramp up, ramp down, or halt based on customer response and resulting PIPP enrollment.

Separately, it is important to note that in order to achieve robust and statistically valid evaluation results in the required timeline, close collaboration between the IOU implementation teams and the Independent Evaluator will be required. Each IOU is implementing its own ME&O strategies to recruit and maintain a minimum number of participants enrolled while maintaining a balance between different groups of customers (e.g., bundled and CCA customer participants). Evaluation of the PIPP pilot will require a quasi-experimental design whereby comparison groups will be identified as enrollment targets are approached based on various customer attributes. The Independent Evaluator, to be contracted by PG&E by April 7, 2022, will provide guidance to the IOUs on ME&O activity, as stratification of the PIPP participants will optimize the analyses resulting from the work of the Independent Evaluator.

²⁷ Attachment A, Section 8.a.

²⁸ PG&E estimates that even fewer than 2-3% of eligible customers will be enrolled, as this estimation is based on the 209,301 customers listed in Table 1 and neither includes any additional zip codes that are selected by the participating CCA population outside of the 20 zip codes (see CCA appendices), nor does it include existing CARE customers who were disconnected two or more times prior to the Disconnection Moratorium.

As required by Attachment A, Section 11,²⁹ PG&E provides its ME&O plan below, which addresses each requirement over the course of the three main phases of the customer experience: outreach/awareness, pilot enrollment, and ongoing customer maintenance. This section also addresses a waitlist process in the event the enrollment cap is reached.

Targeted Marketing and CBO Support

This section describes outreach and awareness activities, which include the requirements a), c), and h) in Section 11.

PG&E plans to target eligible customers with direct mail and email. The direct mail notification, which would be co-branded with any relevant and participating CCA, would explain the parameters of the PIPP pilot, offer enrollment options, provide a link to a PG&E web page that hosts frequently asked questions, and direct them to a designated CBO for more information on the application process. The CBO would also have an opportunity to educate eligible customers about other assistance programs such as Energy Savings Assistance Programs (ESAP) and the Arrearage Management Program (AMP).

PG&E plans to send enrollment information to eligible customers in each zip code in “waves”³⁰ and provide them with a timeframe by which to complete their application to secure their spot in the PIPP pilot. After the expiration of the timeframe and assuming there are still available slots in the PIPP pilot, PG&E would initiate the next outreach wave with its corresponding timeframe expiration. This process would continue until all available PIPP slots are filled, and any application that PG&E receives from an eligible customer after the enrollment period ends would be placed on a wait list.

Other Forms of Outreach

Section 11, items d), f), and g) state that the ME&O plan include components to “...maintain a frequently asked questions section on the utility's website about participation in the PIPP; offer to enroll eligible customers in the PIPP before disconnecting a customer; and allow eligible customers the opportunity to enroll in PIPP when checking their account online or when communicating with a customer service representative.” PG&E affirms that these components are included in the ME&O plan.

²⁹ Attachment A, Section 11 states that each utility will “include in its PIPP Advice Letter a marketing, education and outreach plan with the following components,” listed as items a) through h).

³⁰ Waves will be determined in collaboration with the independent evaluator once the evaluation contract is awarded.

However, as stated earlier, since the number of eligible customers far exceeds the PIPP participation cap, PG&E will scale down or halt these marketing channels as appropriate.

Pilot Enrollment

As described in the Outreach/Awareness section, eligible customers will receive a direct mail notification from PG&E that will include information on the PIPP application process. The eligible customer would then be provided the option of either applying by contacting PG&E directly or by applying via the designated CBO(s). After the customer application is received by PG&E (either directly or indirectly via the applicable CBO(s)) and deemed to be complete, the eligible customer would receive a follow-up communication notifying them of their enrollment into the Pilot, along with reminders about the Pilot requirements to remain enrolled (e.g., remaining enrolled in the CARE program). Additionally, if the eligible customer requested the lower cap amount, the communication would provide them with steps on how to submit their income documentation within the required 90 days.³¹ Collaborating CCAs will either align with PG&E's approach for bundled customers or develop an alternative pilot enrollment process to be implemented with PG&E's collaboration.

Ongoing Maintenance, CCA Coordination, CBO Support

This section describes ongoing maintenance activities, which include the requirements b) continued cooperation with participating CCAs and e) continued customer support throughout the pilot in Section 11.

Section 11.b. requires PG&E to cooperate with participating CCAs. PG&E currently coordinates regularly with CCAs and plans to continue doing so through the course of implementing PIPP.

Section 11.e requires PG&E to provide PIPP customers with ongoing support. To effectuate this and support the Commission's intent to involve CBOs to support the PIPP pilot, PG&E intends to designate the applicable CBO(s) as the main point of contact for the duration of the pilot. PG&E will provide training materials and talking points to ensure that the CBO(s) can manage the majority of customer inquiries. If the PIPP participant needs assistance beyond what the CBO can address (or otherwise prefers to talk with PG&E), PG&E will also be available via its contact center operations to address customer inquiries.

³¹ Attachment A, Section 4 (iii): "Participants who request a bill cap for 0-100% of Federal Poverty Guidelines must prove their income within 90 days or they will be moved to a bill cap for participants at 101-200% of Federal Poverty Guidelines."

Waitlist Process

Given the limited number of PIPP pilot customer slots and the natural attrition³² that may occur over the duration of the PIPP pilot, PG&E recognizes that a waitlist process is appropriate. Despite any attempts to reduce customer dissatisfaction by adopting a phased approach for outreach, there will likely be eligible customers who will be unable to secure their spot in the PIPP pilot after the enrollment period ends. Therefore, PG&E will develop a process to fill any available pilot slots in PG&E's territory. At this time, PG&E plans to fill any slots that may become available roughly every 2 months but may do so sooner or later to match both customer need and operational feasibility. This would allow PG&E to address any potential issue of a PIPP customer – for example, those who move³³ without notifying PG&E and subsequently lose their spot, or any other situation that may arise over the course of the PIPP pilot. Collaborating CCAs will either align with PG&E's approach for bundled customers or develop an alternative pilot waitlist process.

E. Billing Implementation

In its opening comments on the Straw Proposal³⁴, PG&E provided high-level³⁵ estimates on the cost of implementing PIPP, including a range of costs that were dependent both on the final design of the PIPP pilot and what could be automated within PG&E's billing system. In particular, PG&E described that it would upgrading its billing system during the same period in which the PIPP pilot would likely be established, resulting in a potential need to manually bill PIPP participants.³⁶ PG&E will continue to update the Commission and interested parties on the work to modernize the billing system, which is currently underway and will likely extend into 2026³⁷. At this time, PG&E

³² Pilot participants may no longer be eligible for the PIPP pilot due to a number of reasons such as no longer being eligible for CARE (e.g., change in financial status or removal from CARE due to maintained high usage) or moving out of the state.

³³ Section 3.d provides direction on what should be done when a PIPP participant moves from their residence. Generally speaking, PG&E believes that its existing process for transferring service to a new premise will be able to accommodate the transfer of PIPP from one residence to another. However, if the customer closes service entirely and subsequently starts service elsewhere, PG&E would need additional time to verify the customer information to apply PIPP to the new CARE account (assuming the customer remains eligible otherwise).

³⁴ "Pacific Gas and Electric Company's (U 39 M) Opening Comments on the Percentage of Income Payment Straw Proposal", filed July 9, 2021.

³⁵ PG&E notes that its estimates ranged from \$16.79 to \$26.89 million and did not include other key pilot costs such as payment to CBOs for pilot support, the costs of hiring an independent evaluator, or any costs associated with CCA participation.

³⁶ PG&E's Opening Comments, p. 2

³⁷ Because of the complexity and duration of this billing system modernization project, only limited and high priority changes to the billing system will be possible while the upgrade is underway. Modifications to the billing system to enable manual PIPP billing, and eventually more automated PIPP billing, are included in the pipeline of limited high priority changes that will

estimates that it will need to manually bill all PIPP participants through at least Q1 of 2024. PG&E will coordinate with the CCAs over the course of the pilot for billing implementation.

F. Cost Recovery for CCAs

D.21-10-012 states that if a CCA in a utility's service territory opts to participate in PIPP, then the utility will propose a CCA cost recovery proposal consistent with the Arrearage Management Plan (AMP) Resolution (R.), E-5114.³⁸ PG&E's cost recovery proposal is consistent with the cost recovery methodology of AMP, specifically that the electric portion of the bill discount for both bundled and unbundled customers will be recorded in a two-way balancing account and recovered from all customers through electric Public Purpose Program (PPP) rates³⁹ on an equal percent of total revenues basis through the Public Policy Charge Balancing Account (PPCBA)⁴⁰. Electric rates will be true-up on an annual basis through PG&E's Annual Electric True-up (AET) Advice Letter⁴¹.

Additionally, D.21-10-012 states that PG&E will remit the generation portion of the electric bill discount to the CCAs on a monthly basis.⁴² In terms of timing, PG&E will follow the AMP cost recovery methodology, specifically that remittances to CCAs will occur "on a monthly basis once the PPP charge has been adjusted to recover these costs from customers."⁴³

In accordance with D.21-10-012, the participating CCAs have included in Appendix A of this advice letter, or will separately file, a proposed budget⁴⁴. PG&E would like to clarify that any CCA incurred costs that are not attributed to the bill subsidy, as described in Section G below, will not be recorded in PG&E's PIPP balancing or memorandum accounts and that PG&E is not responsible for seeking recovery of those costs.

Finally, D.21-10-012 clarifies how PG&E's CCA cost recovery proposal should be designed to be consistent with the AMP Resolution E-5114, specifically the allocation of a CCA customer's capped electric PIPP bill between generation and non-generation.⁴⁵ This is discussed in Section C above.

be scheduled for implementation while the billing system modernization initiative is being completed.

³⁸ D.21-10-012, p. 31.

³⁹ Res. E-5114, OP 2.

⁴⁰ AL 4334-G-A/6001-E-A, p. 3.

⁴¹ R.E-5114, OP 2.

⁴² D.21-10-012, p. 31.

⁴³ R.E-5114, Findings 7 and OP 4.

⁴⁴ D.21-10-012, p.31.

⁴⁵ D.21.-10-012, p. 32.

G. Establishment of Balancing and Memorandum Accounts

Balancing Account

D.21-10-012, OP 10, authorizes PG&E to establish new two-way balancing accounts, the Percentage of Income Payment Plan Balancing Accounts (PIPPBAs), to record the pilot bill subsidies, or discounts, for both bundled and unbundled customers, (see Tariff Revisions section below and attached preliminary statements). The PIPP bill discounts should be either (a) the difference between the bill cap and the actual bill, or b) zero, if the bill is lower than the bill cap⁴⁶. Additionally, since only California Alternate Rates for Energy (CARE) eligible customers may be enrolled in the PIPP pilot, the PIPP discount will be determined net of the CARE discount, that is the PIPP discount will be considered to be the discounted amount in excess of the CARE discount. Allocation of the PIPP bill cap between electric and gas, which will impact the amount of bill discount recorded to the electric and gas PIPPBAs, is discussed in Section C above.

For the electric portion, PG&E will recover the bill discount from all customer classes in PPP rates on an equal percent of total revenue basis through the PPCBA⁴⁷. For the gas portion, PG&E will recover the bill discount from all customer classes in transportation rates on an equal-cents-per-therm basis through the Core Subaccount of the Core Fixed Cost Account (CFCA) and the Noncore Subaccount of the Noncore Customer Class Charge Account (NCA)^{48, 49}. Electric and gas rates will be trued-up on an annual basis through PG&E's AET and Annual Gas True-up (AGT) Advice Letters, respectively.

Memorandum Account

D.21-10-012, OP 11 authorizes PG&E to establish new memorandum accounts, the Percentage of Income Payment Plan Memorandum Accounts (PIPPMAs), to track incremental administrative costs for the PIPP pilot (see Tariff Revisions section below and attached preliminary statements). These costs are defined as those "that are incurred solely for the purpose of implementing the PIPP pilots and do not include costs that would have been incurred in the course of administering the CARE program or other existing responsibilities of the utilities or CCAs"⁵⁰.

⁴⁶ D.21-10-012, Attachment A, Section 8.b.

⁴⁷ This is in accordance with D.21-10-012, Attachment A, Section 12, and is the same methodology PG&E uses to recover Arrearage Management Plan debt forgiveness, see AL 4334-G-A/6001-E-A, p. 3.

⁴⁸ Refer to Gas Preliminary Statement Part C, Section C.3.a., Distribution Base Revenue Requirements cost category for the cost allocation factors used to determine the core and noncore portions of amounts recorded in the CFCA and NCA, respectively.

⁴⁹ This is in accordance with D.21-10-012, Attachment A, Section 12, and is the same methodology PG&E uses to recover Arrearage Management Plan debt forgiveness, see AL 4334-G-A/6001-E-A, p. 3.

⁵⁰ D.21-10-012, p. 66.

PG&E expects to incur incremental administrative expenses and may incur incremental capital expenditures to implement the PIPP pilot.⁵¹ PG&E's accounting policies will be applied to the incremental costs recorded to the PIPPMAs to determine expense or capitalization treatment⁵². PG&E has included in the preliminary statements attached to this advice letter accounting procedures to allow both expense and capitalized costs to be recorded to the PIPPMAs in the event that these costs are incurred in order to implement the PIPP Pilot.

Costs attributed specifically to electric service will be recorded to the electric account and costs attributed specifically to gas service will be recorded to the gas account. Costs that cannot be specifically attributed either to providing electric service or gas service will be allocated according to the currently adopted electric/gas split for CARE Program administrative costs⁵³. Using the same allocation for PIPP administrative costs as CARE administrative costs is a reasonable approach, since only CARE eligible customers may be enrolled in PIPP.

The disposition of the balances in these memorandum accounts will be addressed in a future proceeding or other application. Upon review and approval by the CPUC, PG&E will transfer the electric PIPPMA balance to the PPCBA for recovery in PPP rates and the gas PIPPMA balance to the NCA and CFCA for recovery in transportation rates on an equal cents per therm basis in accordance with D.21-10-012⁵⁴. PG&E proposes herein that the electric PPP recovery occur on an equal percent of total revenues basis, consistent with the existing PPCBA methods.

On December 1, 2021 PG&E filed AL 4534-G/6418-E⁵⁵ requesting approval from the CPUC to temporarily record PIPP pilot administrative costs to the Disconnection Memorandum Account (DMA) during the period between the issuance of D.21-10-012 and the approval of the PIPP AL. Upon approval of the PIPP AL, PG&E will transfer the PIPP pilot administrative costs from the DMAs to the PIPPMAs.

⁵¹ These expenses include shared costs amongst the IOUs, such as working group facilitation costs or evaluation costs. PG&E currently expects that shared costs will be split as a proportion of each IOU's PIPP participation cap.

⁵² These policies apply to property, plant, and equipment as well as computer software. Lifespan, inclusion in the Retirement Unit Catalog, and exceeding a minimum material cost per unit, are among the main determining factors. However, some situations are very specific and require additional analysis and judgement in determining the cost categorization.

⁵³ D.21-06-015, p. 430, adopts an allocation of 80 percent of the CARE Program administrative expenses to electric customers and 20 percent to gas customers for program years 2021-2026.

⁵⁴ D.21-10-012, p. 66.

⁵⁵ AL 4534-G/6418-E, Temporary Tracking of Percentage of Income Payment Plan pilot administrative costs in the Disconnection Memorandum Account, was filed on December 1, 2021 and is pending CPUC approval as of the date of this filing.

H. Estimated PIPP Pilot Timeline

PG&E recommends the Commission consider that the PIPP pilot launch at the same time statewide⁵⁶ and that the launch date should be no earlier than July 1, 2022. Consequently, launching the PIPP pilot no sooner than July 1 will give the Independent Evaluator, to be contracted by April 7, 2022, time to complete the experimental design that will guide the ME&O effort and recruitment of customers into the PIPP pilot. This timeline also provides PG&E and the other IOUs time to coordinate with CBOs, prepare marketing materials, finalize billing system implementation, and standup any other supporting functions. In addition, this timeline takes into account the uncertainty of the timing of the Commission's final resolution approving the various Tier 3 advice letters.

I. Tariff Creations and Revisions

PG&E is including the following tariffs:

- Establish Electric Preliminary Statement Part JL, Percentage of Income Payment Plan Balancing Account – Electric (PIPPBA-E), to record and track the electric portion of the revenue shortfall, or discount, from the PIPP bill cap pursuant to D.21-10-012.
- Establish Gas Preliminary Statement Part FT, Percentage of Income Payment Plan Balancing Account – Gas (PIPPBA-G), to record and track the gas portion of the revenue shortfall, or discount, from the PIPP bill cap pursuant to D.21-10-012.
- Establish Electric Preliminary Statement Part JM, Percentage of Income Payment Plan Memorandum Account – Electric (PIPPMA-E), to track the incremental administrative costs of the PIPP pilots pursuant to D.21-10-012.
- Establish Gas Preliminary Statement Part FU, Percentage of Income Payment Plan Memorandum Account – Gas (PIPPMA-G), to track the incremental administrative costs of the PIPP pilots pursuant to D.21-10-012.
- Modify Electric Preliminary Statement Part HM, Public Policy Charge Balancing Account (PPCBA), to add accounting procedures to (1) transfer the balances of the PIPPBA-E for true-up in rates, and (2) transfer the balances from other accounts upon approval by the CPUC for true-up in rates.

While the above are submitted as final tariffs, the four tariffs below are submitted on a pro forma illustrative basis, and will be updated later through a subsequent Tier 1 advice letter based on the June 1, 2022 updated CARE income guidelines upon approval of this advice letter:

- Establish Electric Schedule E-PIPP, Percentage of Income Payment Plan (PIPP) Pilot, to set forth PIPP applicability criteria and PIPP bill caps for electric, gas, electric generation, and electric non-generation PIPP service.

⁵⁶ PG&E notes that SDG&E has been granted the authorization to start ME&O on the later of July 1, 2022 or 45 days after the approval of its PIPP implementation advice letter (Attachment A, Section 7.d.).

- Establish Gas Schedule G-PIPP, Percentage of Income Payment Plan (PIPP) Pilot, to set forth PIPP applicability criteria and PIPP bill caps for electric and gas service.
- Establish Electric Rule 19.5, Percentage of Income Payment Plan (PIPP) Pilot Eligibility and Certification Rules for Individually Metered Electric Customers.
- Establish Gas Rule 19.5, Percentage of Income Payment Plan (PIPP) Pilot Eligibility and Certification Rules for Individually Metered Gas Customers.

J. CCA ME&O Appendices

As described previously, PG&E is including the appendices provided by each participating CCA, unaltered.

Conclusion

PG&E respectfully requests the Commission approve this Tier 3 advice letter as submitted with an effective date of October 7, 2021 in accordance with the final decision date of D.21-10-012.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than February 24, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E and CCAs via E-mail at the addresses shown below on the same date it is electronically delivered to the Commission:

For PG&E: Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

For 3CE: Hilary Staver
Director of Regulatory and Legislative Affairs
E-mail: hstaver@3ce.org

For EBCE: Feby Boediarto
Regulatory Analyst
E-mail: fboediarto@ebce.org

For MCE: Stephanie Chen
Senior Policy Counsel
E-mail: schen@mcecleanenergy.org

For PIO: Alexia Retallack
Program Specialist II
E-mails: alexiar@pioneercommunityenergy.ca.gov; and
regulatory@pioneercommunityenergy.ca.gov

For RCEA: Aisha Cissna
Manager, Regulatory and Legislative Policy
E-mail: ACissna@redwoodenergy.org
www.RedwoodEnergy.org

For VCE: Edward Burnham
Director of Finance & Internal Operations
E-mails: info@valleycleanenergy.org; and
edward.burnham@valleycleanenergy.org

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 and 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

Upon Commission approval, PG&E requests that this Tier 3 advice submittal become effective as of the final PIPP decision (D.21-10-012) date of October 7, 2021. As described above, PG&E plans to submit a subsequent Tier 1 advice letter upon approval of this advice letter, to reflect the appropriate bill caps based on updated June 1, 2022 CARE income guidelines prior to the launch of the PIPP pilot.

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 R.18-07-005. 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:

Appendix A: Participating CCAs
Attachment 1: Final Tariffs
Attachment 2: Pro Forma Tariffs
Attachment 3: Redline Tariff Revisions

cc: Service List R.18-07-005



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 M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@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) #: 4569-G/6493-E

Tier Designation: 3

Subject of AL: Pacific Gas and Electric Company's Proposed Percentage of Income Payment Plan Pilot in Compliance with D.21-10-012

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.21-10-012

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: 10/7/21

No. of tariff sheets: 12

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: See Attachment 1

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

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

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

Clear Form

Appendix A

Participating CCAs

CCA	Advice Letter Number
Central Coast Community Energy	Advice 31-E
East Bay Community Energy	Advice 36-E
Marin Clean Energy	Advice 59-E
Pioneer Community Energy	Advice 10-E
Redwood Coast Energy Authority	Advice RCEA-014-E
Valley Clean Energy Alliance	Advice 12-E

February 04, 2022

Advice 31-E
Central Coast Community Energy Appendix

Public Utilities Commission of the State of California

Subject: **Central Coast Community Energy Proposed Percentage of Income Payment Plan Pilot in Compliance with D.21-10-012**

Background

Central Coast Community Energy (“CCCE”), formerly known as Monterey Bay Community Power Authority, is a joint powers authority serving as the Community Choice Aggregator (“CCA”) for Monterey, San Benito and Santa Cruz Counties, and parts of San Luis Obispo and Santa Barbara Counties. CCCE serves more than 400,000 customers throughout the Central Coast.

Rulemaking (R.) 18-07-005 was opened in 2018 to “adopt rules and policies to reduce disconnections and improve reconnection processes and outcomes for disconnected customers.” Within that Rulemaking, D.20-06-003 established a ratesetting phase of the proceeding to consider a Percentage of Income Payment Plan (PIPP) program. D.21-10-012 then adopted a PIPP pilot and concluded the PIPP phase of the proceeding; OP 2 of this decision ordered the IOUs and participating CCAs to submit a Tier 3 advice letter proposing various implementation details for PIPP.

Discussion

A. Proposed Eligible Zip Codes

93458 – Santa Maria
93906 – Salinas

CCCE selected the proposed zip codes based on their high percentage of qualified customers in both CARE and disconnections categories.

B. Marketing, Education & Outreach

CCCE agrees to PG&E’s proposed ME&O plan.

C. Community Based Organization Engagement

CCCE agrees to PG&E's Community-Based Organization Engagement plan.

D. Proposed Budget

CCCE foresees a proposed budget commensurate with the estimates presented by PG&E for administrative costs. An estimated budget will be delivered after the approval of this Advice Letter and prior to the commencement of the pilot.

February 04, 2022

Advice 36-E
East Bay Community Energy Appendix

Public Utilities Commission of the State of California

**Subject: East Bay Community Energy (EBCE) Proposed Percentage of Income
Payment Plan Pilot in Compliance with D.21-10-012**

Background

EBCE is a Joint Powers Authority formed on December 1, 2016, pursuant to California Government Code §§ 6500 et. seq. by the County of Alameda and each of the following cities incorporated therein: Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Oakland, Piedmont, San Leandro, and Union City. The Commission certified EBCE's Implementation Plan on November 8, 2017. EBCE started serving Alameda County businesses and municipalities in June 2018 and began serving residential customers in November 2018. On March 9, 2020, the Commission certified Addendum #1 to EBCE's Implementation Plan and Statement of Intent, adding the cities of Newark and Pleasanton, as well as the city of Tracy in San Joaquin County, to EBCE's service territory beginning in 2021. EBCE is currently one of the largest CCAs in the state.

Pursuant to Decision 21-10-012 (D.21-10-012) issued on October 11, 2021, authorizing the Percentage of Income Payment Plan (PIPP) pilot programs, CCAs notified their participation 30 days post-decision to establish program access for CCA customers. EBCE filed a notice of intent to participate on November 5, 2021. CCAs were allotted a participation target proportional to the utilities participation, based on the CCAs projected share of customers in the utility service territory as established in the D.21-10-012, Attachment A. PG&E applied the ratio of total care CCA residential customers against the total care bundled residential customers for the CCA. This methodology granted EBCE 703 spots for eligible customers.

According to D. 21-10-012, Ordering Paragraph 2, the Commission ordered PG&E to coordinate with the CCAs to file a Tier 3 joint advice letter. The Commission directed participating CCAs to present a plan with the following details:

- proposed eligible ZIP codes;
- marketing education and outreach plan;
- community-based organization engagements; and
- proposed budget.

EBCE has included these details below. Additionally, EBCE has included information describing a proposed lottery-based enrollment approach intended to meet customers fairly and equitably.

EBCE introduced and reviewed the enrollment details with PG&E on January 21 and January 26, 2022 to ensure proper coordination when enrolling our customers.

Discussion

A. Proposed Eligible Zip Codes

EBCE proposes that customers living in one of the Top 20 zip codes with the highest total number of disconnections should be eligible to participate in PIPP. These zip codes are shown in the table below.

Table I: Proposed Eligible Zip Codes

ZIP Code	City/County
94605	Oakland
94541	Hayward
94601	Oakland
94544	Hayward
94621	Oakland
94603	Oakland
94606	Oakland
94578	San Leandro
94608	Emeryville
94607	Oakland
94577	San Leandro
94538	Fremont
94536	Fremont
94587	Union city
94546	Castro Valley
94560	Newark
95377	Tracy

94568	Dublin
94619	Oakland
94609	Oakland

EBCE recognizes that program space is limited and that granting eligibility to 20 zip codes results in a large number of eligible customers. However, as described in more detail below, EBCE intends to utilize a randomized lottery to select participants for PIPP, to mitigate concerns about over-marketing, and will conduct targeted marketing to customers who can likely benefit most from this program: those with 2+ prior disconnections who live in the zip codes above and meet other program eligibility requirements.

B. Marketing, Education & Outreach

This section describes outreach and awareness activities that differ from the approach PG&E describes in Appendix D of this Advice Letter. EBCE's Marketing, Education, and Outreach (ME&O) goal is to achieve the target enrollment of participants using a lottery-based application process, allowing all applicants an equal chance of being enrolled.

EBCE's enrollment campaign for the PIPP program will concentrate efforts on CARE customers residing in the zip codes provided in Section A above, a total of 86,280 leads. The total population of customers is also referred to as "Group 2" in this advice letter.

Further, we believe that this program was designed for customers showing the largest need – active CARE customers in the 'Top 20' zip codes *and* with 2+ disconnections. The following ME&O plan was designed to provide these 6,850 leads – "Group 1" leads – with an enrollment advantage.

EBCE will take an application-based approach to PIPP enrollment. Since program space is limited, to ensure an equitable selection process, at the end of the application period, all applicants who meet eligibility criteria will be placed into a randomized lottery to select the final PIPP participants. Pursuant to PG&E's advice letter, EBCE's anticipated program size is 703 residents.

Benefits of this approach:

- **Level Playing Field.** Allows all applicants to have the same chance of being enrolled, not just those with the best access to information.
- **Allows flexibility in marketing.** We can advertise the program widely, without the fear of creating a negative customer experience we'd have under a "first come, first enrolled" enrollment approach.
- **Potential to leverage other programs.** We can use the application process to identify customers who may qualify for other low-income programs we offer now or may offer in the future.
- **Removes the administrative burden of creating a waitlist.** Assuming we receive more qualified applicants than we have space for, we will generate a program waitlist automatically.

EBCE's ME&O plan includes a PIPP landing page with application portal and business reply card ("BRC") mailers, co-branding with PG&E will explain the parameters of the PIPP pilot and provide ways to participate in the PIPP lottery (i.e. online, business reply card, or Call Center). Below specifies marketing strategies for two different customer populations as referred to as Group 1 and Group 2.

Pre-Launch Campaign | Group 1 Customers – active CARE customers in the 'Top 20' zip codes *and* with 2+ disconnections (6,851)

The pre-launch campaign is designed exclusively for Group 1 Customers.

- Direct Mail: Targeted, personalized and pre-filled BRC mailers will be sent to Group 1 customers only. The direct mail notification, which will be co-branded with PG&E, will explain the parameters of the PIPP pilot lottery and offer enrollment options. BRC recipients will be directed to EBCE's Frequently Asked Questions website or to call an EBCE customer service representative if there are enrollment questions.

The BRC mailer is designed to provide advance notice to the active CARE customers with 2+ service disconnections – those who could benefit most from this program. EBCE intends to send out the BRC mailers prior to the lottery application launch date. The Group 1 population will be given at least a week prior to the Application Period to properly coordinate and market the pilot. As a way to meet our customers equitably, we understand that the Group 1 population of customers may need a longer lead time to know about the PIPP program and to sign up for the lottery due to various factors, including inflexibility of schedules and possible mistrust of information.

Email: After the BRC mailers are sent, EBCE intends to follow-up with an email correspondence days before the start of the lottery launch date to all customers with an email address on file.

Application Period | Group 2 - All Active Care Customers (86,280)

Geo-targeted, mass marketing campaign to launch at the start of the Application Period. The go-to media plan includes heavy local coverage across paid social, digital and print media for 30 days of the Application Period. Marketing materials will be available in English, Spanish and Simple Chinese.

- Landing page on EBCE.org. To contain complete information on the PIPP Program, including FAQs and lottery application.
- Email: Emails will deploy to every lead with an email address on file.
- Social, Digital & Print. Heavy, local geo-targeted marketing across the following channels:
 - Print & digital newspapers (BANG, Next Door, etc.)
 - Paid and EBCE-owned social media channels (Facebook, Instagram, Twitter)
- Out of Home Media: bus signs, bus shelters and billboards

- Community Based Organizations: EBCE to leverage established relationships with local CBOs to distribute and share PIPP program materials (posters, handbills), to answer questions on the PIPP program, and to assist clients with online applications.

B.1. Pilot Enrollment

As described in the section above, EBCE will conduct targeted and broad marketing to customers prior to the date the application opens.

Once the application opens, EBCE proposes the following lottery-based enrollment process.

1. Residents complete the application by the application date.
 - Residents can apply via an online form hosted on EBCE's website or via a Business Reply Card.
2. EBCE conducts eligibility pre-screening.
 - EBCE verifies that the applicant is enrolled in CARE, lives in an eligible zip code or has been disconnected 2+ times, and is an EBCE customer.
 - Customers that pass the pre-screen are submitted for the lottery. Customers that do not pass are notified.
3. Lottery
 - EBCE places all eligible applicants into a randomized lottery at the same time, and selects the number of households equal to EBCE's PIPP program allocation. As noted above, EBCE anticipates selecting 703 participants.
4. Verification and enrollment by PG&E
 - EBCE submits selected applicants to PG&E for income verification and enrollment.
5. Waitlisting
 - Eligible applicants who are not selected in the initial lottery process will remain on a program waitlist. If program space becomes available, waitlisted customers will be placed into a subsequent randomized lottery.

EBCE will structure the application and lottery time period such that it is able to meet the requirement of D. 21-10-012 to enroll half of its allotted participation level within 6 months after the pilot begins.

C. Community Based Organization (CBO) Engagement

EBCE will defer to PG&E's CBO engagement plan described in Section D. Additionally, EBCE recently launched an outreach grant for CBOs to assist EBCE with outreach and enrollment into programs that serve low-income customers such as the Arrearage Management Program (AMP). EBCE hopes to leverage its established and new partnerships. Also, EBCE has included a budget line item for CBO compensation in its proposed budget in the next section.

D. Proposed Budget

In conformance with D.21-10-012 EBCE submits the following budget proposal. EBCE expects to begin implementation of the PIPP program in 2022 and includes proposed budget requests for billing, ME&O, CBO engagement, and administrative costs below.

EBCE provides the following details about the budget summary:

- Billing costs reflect the cost of expected system upgrades to support program implementation and implement semi-manual processes. The estimates provided are preliminary. Actual costs will be dependent upon billing mechanics and additional coordination with PG&E.
- ME&O costs include the direct costs of all outreach materials to be used by EBCE or CBOs
- CBO Engagement costs include compensation for organizations to provide customers with 1:1 assistance as well as funds EBCE proposes to provide to CBOs for outreach work
- Administrative costs include the cost of staff time associated with program management, regulatory compliance, marketing, and billing operations. EBCE anticipates five employees will be involved with PIPP program administration across these areas.

Table II: Proposed Budget

EBCE submits this budget pursuant to Decision 21-10-012.¹ It includes all program costs, including ME&O and administrative costs. EBCE is not seeking to recover administrative costs in this filing. EBCE will track administrative costs and may seek recovery in the future.

Budget Category	Details	Estimate
Billing	System upgrades to support program implementation and implement semi-manual processes	\$ 60,000.00
ME&O	Email	\$ -
	Direct Mail Postcards with prepaid BRC	\$ 7,500.00
	Outdoor Media	\$ 10,000.00
	Paid Social & Digital Media	\$ 1,500.00
	Local Newspaper Groups (print and digital)	\$ 6,000.00
	Collateral for CBOs	\$ 2,500.00
	Website and online application development	\$ 25,000.00
CBO Engagement	Compensation for up to 5 organizations to provide customers with 1:1 assistance with applications	\$ 30,000.00
	Honorarium for up to 10 organizations for hanging posters and distributing flyers that announce the PIPP application period	\$ 5,000.00
Administrative Costs	Labor (program management, marketing, compliance, billing)	\$ 227,366.10
TOTAL		\$ 374,866.10

¹ D. 21-10-012, Conclusions of Law 11(d) and Ordering Paragraph 3.

February 04, 2022

Advice 59-E
MCE Appendix

Public Utilities Commission of the State of California

Subject: **MCE Proposed Percentage of Income Payment Plan Pilot in Compliance with D.21-10-012**

Background

MCE is a not-for-profit, public agency that provides electricity service and innovative programs to more than 540,000 customer accounts and more than one million residents and businesses in 37 member communities across four Bay Area counties: Contra Costa, Marin, Napa, and Solano.

In July 2018, the California Public Utilities Commission (Commission) opened Rulemaking (R.) 18-07-005 to address SB 598 which addressed residential disconnections across all of California's electric and gas investor-owned utilities. Decision (D.) 20-06-003 within that proceeding established a ratesetting phase to consider a Percentage of Income Payment Plan (PIPP) program. In October 2021, the Commission issued D. 21-10-012 adopting a PIPP pilot.

Ordering Paragraph (O.P.) 3 of D. 21-10-012 stated that CCAs could opt to participate in a utility's PIPP pilot program. Accordingly, MCE provided notice to PG&E and, per O.P. 3, is jointly submitting this Tier 3 advice letter.

Discussion

A. Proposed Eligible Zip Codes and Target Enrollment Level

As noted above, MCE's target enrollment cap is 587 customers. MCE has selected the following zip codes to target for the PIPP program: 94590 (Vallejo) and 94806 (Richmond/San Pablo). The proposed zip codes have both the highest number of disconnections and the highest number of accounts with two or more disconnections in MCE's service area, as reported by PG&E.

B. Marketing, Education & Outreach

MCE supports the Marketing, Education & Outreach (ME&O) approach presented by PG&E in Section D, above. In addition, MCE will engage directly with, and provide support to, the PG&E-appointed Community Based Organization(s) (CBOs) that serve the above zip codes. MCE will also conduct focused outreach to targeted eligible customers, to provide customer status

communications and to identify other assistance programs for which targeted customers may be eligible. MCE will coordinate these communications with additional CBOs and with local government partners as appropriate. ME&O will be conducted through direct mail, email, flyers and other digital outreach as appropriate to successfully reach eligible customers.

C. Community Based Organization Engagement

MCE supports the CBO engagement approach presented by PG&E in Section D, above. In addition, MCE will engage directly with, and provide additional support to, the PG&E-appointed CBO(s) that serve MCE's eligible zip codes. This engagement will be done in coordination with PG&E and will, among other things, help to ensure that PIPP-eligible customers who receive assistance from the identified CBO(s) are properly assisted to be able to identify and enroll in MCE programs from which they may benefit.

D. Proposed Budget

MCE foresees a proposed budget commensurate with the lower-level estimates presented by PG&E for billing, marketing, education and outreach, community-based organization engagement and administrative costs. An itemized budget will be deliverable prior to the commencement of the pilot.



January 31, 2022

**Advice Letter 10-E
Pioneer Community Energy Appendix**

Public Utilities Commission of the State of California

**Subject: Pioneer Community Energy Proposed Percentage of Income
Payment Plan Pilot in Compliance with D.21-10-012**

Background

Pioneer Community Energy (Pioneer) is a community choice aggregation (CCA) program situated in the Sierra Nevada. It is the most easterly of the established CCAs. Pioneer began serving load to unincorporated Placer County, and the cities of Auburn, Colfax, Lincoln, Rocklin, and the Town of Loomis in February 2018. El Dorado County and Placerville joined Pioneer in 2021. By the completion of the enrollment in 2022, Pioneer will serve nearly 160,000 accounts.

In July 2018, the California Public Utilities Commission (Commission) opened Rulemaking (R.) 18-07-005 to address SB 598 which addressed residential disconnections across all of California's electric and gas investor-owned utilities.¹ Decision (D) 20-06-003 within that proceeding established a ratesetting phase to consider a Percentage of Income Payment Plan (PIPP) program. In October 2021, the Commission issued Decision (D) 21-10-012 adopting a PIPP pilot. OP 3 of this decision directs eligible CCAs opting to participate to jointly file a Tier 3 advice letter with the applicable utility.²

To support the creation of this Tier 3 advice letter, Pioneer Community Energy has participated in the working group meetings with the investor-owned utilities together and coordination meetings separately with PG&E.³

Discussion

A. Proposed Eligible Zip Codes

As part of the coordination effort, PG&E provided Pioneer Community Energy with a list of eligible high disconnection zip codes and a participation target of 76, based upon the Commission's CCA participation cap of less than 1% of the CCA's residential customers⁴. Following discussion with PG&E regarding concerns for possible overreach of marketing

¹ Decision 21-10-012, p. 4.

² Ibid, p. 90.

³ Ibid, p. 28.

⁴ “ “

creating an over enrollment issue, Pioneer selected two zip codes 95603 and 95713, and notified PG&E accordingly. These zip codes had some of the highest disconnection rates in Placer County as presented by PG&E.

B. Marketing, Education & Outreach

During discussions with PG&E regarding marketing, education and outreach (ME&O), Pioneer offered a supporting position to PG&E's marketing effort to reduce possible customer confusion, maintain program integrity, and ensure proper processing of enrollment. Pioneer offers digital and electronic communication support to the PG&E ME&O efforts through Pioneer's e-mail platform. Pioneer will coordinate messaging and outreach with PG&E for this effort as needed for initial enrollment and maintenance. Pioneer estimates that costs for this support will be minimal and mostly staff hours to prepare digital messages and email distribution.

C. Community Based Organization Engagement

PG&E has pre-existing relationships with Community Based Organizations (CBO) in the Pioneer service area. Moreover, the CBOs PG&E has identified have already established the necessary customer data privacy policies, processes, and procedures needed for operating a PIPP program. Pioneer will not be engaging additional CBOs as part of this initial pilot.

D. Proposed Budget

Under D.21-10-012, the Commission directs the investor-owned utilities to perform CCA cost recovery consistent with the Arrearage Management Plan⁵. D.21-10-012 directs the Investor-Owned-Utilities to record incremental administrative costs. As PIPP is a newly established pilot program, Pioneer does not possess a clear understanding of what administrative or implementation costs it may incur for participating in the PIPP pilot program at this time. Pioneer intends to return to the Commission at a later date with a budget for its participation when these costs are more discernable.

⁵ D.21-10-012, p. 31.

February 04, 2022

Advice RCEA-014-E
Redwood Coast Energy Authority Appendix

Public Utilities Commission of the State of California

Subject: **Redwood Coast Energy Authority (RCEA) Proposed Percentage of Income Payment Plan Pilot in Compliance with D.21-10-012**

Background

The Redwood Coast Energy Authority is a local government Joint Powers Agency whose members include the County of Humboldt; the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad; and the Humboldt Bay Municipal Water District.

The purpose of RCEA is to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient and renewable resources available in the region for the benefit of the Member agencies and their constituents. RCEA is a Community Choice Aggregator that launched in 2017.

Rulemaking (R.) 18-07-005 was opened in 2018 to “adopt rules and policies to reduce disconnections and improve reconnection processes and outcomes for disconnected customers.” Within that Rulemaking, D.20-06-003 established a ratesetting phase of the proceeding to consider a Percentage of Income Payment Plan (PIPP) program. D.21-10-012 then adopted a PIPP pilot and concluded the PIPP phase of the proceeding; OP 2 of this decision ordered PG&E to submit a Tier 3 advice letter proposing various implementation details for PIPP.

Ordering Paragraph 3 of D. 21-10-012 stated that CCAs could opt to participate in a utility’s PIPP pilot program. Accordingly, RCEA provided notice to PG&E and, per OP3, is jointly submitting this Tier 3 advice letter.

Discussion

A. Proposed Eligible Zip Codes

RCEA selected target zip codes are 95501 and 95546. These two zip codes were chosen based on data provided by PG&E that identified RCEA customer data for the top 6 zip codes with the highest number of disconnections and RCEA customer data for customers with 2 or more disconnections in the top 6 zip codes with the highest number

of disconnections & eligibility rules applied. The zip codes are based on the disconnection percentage, community economic status, and consideration for the Market and Outreach plan opportunities for the 93 allocations given RCEA.

B. Marketing, Education & Outreach

RCEA is partnering with PG&E as referenced and as described by PG&E in section D of the Advice Letter.

C. Community Based Organization Engagement

RCEA is partnering with PG&E as referenced and as described by PG&E in section D of the Advice Letter.

D. Proposed Budget

Cost Category	Description	Estimates (4 yr. costs)		
Shortfall (i.e., bill subsidy)	All billed costs that exceed the collected amount from a PIPP participant. Recovered through current decision consistent with Decision 21-10-012 dated October 7, 2021 (Section 12.2 Cost Recovery).	Electric: TBD		
Information Technology (IT) 3rd Party Billing contract	All costs associated with support of monthly manual bill calculations or interventions related to PIPP participants (e.g. billing exception processing) 1/	TBD		
RCEA Customer Support	1. Program maintenance labor 2/ 2. Employee training and ongoing Call Center support 3. Customer Service and notifications (e.g. calls, letters, emails, webpage updates)	\$8,080		
PIPP Pilot Planning and Implementation	Collaboration, reporting, project management	\$20,800		
Total Costs		\$28,880 +TBD costs		

1/ This estimate assumes the cost of manually calculating 93 participants, which includes reviewing the account monthly, ensuring that the participant does not pay more than the monthly capped amount by manual adjustments, and tracking the adjustments for reporting. Depending on account complexity this estimate may vary substantially (\$36,000-\$180,000).

2/ This estimate includes, but is not limited to, participation in ongoing working group meetings, providing data for regulatory filings, monitoring pilot participant enrollment and coordinating additional outreach as needed.



REDWOOD COAST
Energy Authority

February 04, 2022

Advice 12-E
Valley Clean Energy Alliance Appendix

Public Utilities Commission of the State of California

Subject: **Valley Clean Energy Alliance Proposed Percentage of Income
Payment Plan Pilot in Compliance with D.21-10-012**

Background

VCE was formed as a Joint Powers Authority (“JPA”) of the City of Davis and County of Yolo in 2016. The City of Woodland joined the JPA in June 2017, and the City of Winters joined in 2021. The members formed VCE for the purposes of implementing a community choice aggregation (“CCA”)/Community Choice Energy (“CCE”) program to allow VCE to provide electric generation service within their respective jurisdictions. VCE initiated customer service on June 1, 2018. As of June 15, 2021, VCE is serving approximately 62,000 customer accounts, which are expected to have a retail load of 719,098 megawatt-hours (“MWh”) in 2021.

Discussion

A. Proposed Eligible Zip Codes

VCE’s selected zip codes are 95695 and 95776.

B. Marketing, Education & Outreach

Approach is as described by PG&E in section D of the Advice Letter.

C. Community Based Organization Engagement

Approach is as described by PG&E in section D of the Advice Letter.

D. Proposed Budget

Cost Category	Description	Estimates (4 Year)
Shortfall (i.e., bill subsidy)	All Billing costs that exceed the collected amount from a PIPP participant. Recovered through current decision consistent with Decision 21-10-012 dated October 7th, 2021 (Section 12.2 Cost Recovery)	TBD
Information Technology (IT) Including 3rd Party Billing Support	*All Costs associated with support of monthly manual bill calculations or interventions related to PIPP participants (e.g.; Billing exception processing)	240,000
VCE Customer Support	1) Program maintenance labor 2) **Employee training and ongoing call center support 3) **Customer Service and notifications (e.g. calls, letters, emails, webpage updates)	45,000
PIPP Pilot Planning and Implementation	**Collaboration, Reporting, Project Management	20,000

* This estimate assumes the costs associated with calculating 73 participants, which includes reviewing the account monthly, ensuring, that the participant does not pay more than the monthly capped amount by manual adjustments, and the tracking the adjustments for reporting. Depending on the account complexity this estimate may vary significantly in either direction. Estimated \$60,000 per year.

** This estimate includes, but is not limited to, participating on ongoing workgroup meetings, providing data for regulatory filing, monitoring pilot participant enrollment and coordinating additional outreach as needed.

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
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GAS PRELIMINARY STATEMENT PART FT

Sheet 1

(N)

PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT - GAS (PIPPBA-G)

(N)

FT. PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT - GAS (PIPPBA-G)

(N)

1. **PURPOSE:** The purpose of the Percentage of Income Payment Plan Balancing Account – Gas (PIPPBA-G), a two-way balancing account, is to record and track the gas portion of the revenue shortfall, or discount, from the PIPP bill cap pursuant to Decision (D.) 21-10-012. The PIPP bill discounts should be either (a) the difference between the bill cap and the actual bill, or (b) zero, if the actual bill is lower than the bill cap, and are net of California Alternate Rates for Energy (CARE) discounts, i.e. the discounted amount in excess of the CARE discount.
2. **APPLICABILITY:** The PIPPBA-G shall apply to all eligible gas residential customers.
3. **REVISION DATE:** Distribution of the balances of the PIPPBA-G will be in gas transportation rates on an equal cents per therm basis through the Core Subaccount of the Core Fixed Cost Account (CFCA) and the Noncore Subaccount of the Noncore Customer Class Charge Account (NCA) on an annual basis as part of PG&E's Annual Gas True-up (AGT) advice letter filing. Refer to Gas Preliminary Statement Part C.3.a., Cost Category Other-Equal Distribution Based on All Transportation Volumes for the cost allocation factors used to determine the core and noncore portions of amounts recorded in the CFCA and NCA, respectively.
4. **RATES:** The PIPPBA does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the PIPPBA by making the following entries, net of Revenue Fees and Uncollectibles (RF&U), to the account at the end of each month, or as applicable:
 - a. A debit entry equal to the revenue shortfall that would have been collected had the customer(s) not been eligible for the PIPP bill cap;
 - b. A credit entry to transfer the balance or amounts to the CFCA and NCA for true-up in rates;
 - c. A debit or credit entry to transfer amounts in this account to other accounts, or amounts from other accounts to this account upon approval by the Commission; and
 - d. A debit or credit entry, as appropriate, equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(N)

(Continued)

Advice 4569-G
Decision D.21-10-012

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 4, 2022



GAS PRELIMINARY STATEMENT PART FU

Sheet 1

(N)

PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT - GAS (PIPPMA-G)

(N)

FU. PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT - GAS (PIPPMA-G)

(N)

1. **PURPOSE:** The purpose of the Percentage of Income Payment Plan Memorandum Account – Gas (PIPPMA-G) is to track the incremental administrative costs of the PIPP pilots pursuant to Decision (D.) 21-10-012. These costs are incurred solely for the purpose of implementing the PIPP pilots and do not include costs that would have been incurred in the course of administering the CARE program or other existing responsibilities of the utilities or CCAs. General costs that cannot be attributed specifically to either providing electric or gas service will be allocated according to the currently adopted electric/gas split used for administrative costs for the California Alternate Rates for Energy (CARE) Program.
2. **APPLICABILITY:** The PIPPMA-G shall apply to all gas customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balance in this account will be in gas transportation rates on an equal cents per therm basis through the Core Subaccount of the Core Fixed Cost Account (CFCA) and the Noncore Subaccount of the Noncore Customer Class Charge Account (NCA) and addressed in a future cost recovery proceeding, separate application, or as otherwise authorized by the Commission.
4. **RATES:** The PIPPMA does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the PIPPMA by making the following entries, net of Revenue Fees and Uncollectibles (RF&U), to the account at the end of each month, or as applicable:
 - a. A debit entry equal to the actual incremental administrative costs to implement the PIPP Pilot.
 - b. A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred if any. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment.
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission.
 - d. A debit or credit entry, as appropriate, equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(N)

(Continued)

Advice 4569-G
Decision D.21-10-012

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 4, 2022



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Advice 4569-G
Decision D.21-10-012

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 4, 2022



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ELECTRIC PRELIMINARY STATEMENT PART HM
PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)

Sheet 1

HM. Public Policy Charge Balancing Account (PPCBA)

1. **PURPOSE:** The purpose of the Public Policy Charge Balancing Account (PPCBA) is to track revenues and actual costs incurred to implement adopted programs that may be funded through public policy funds.
2. **APPLICABILITY:** The subaccounts will apply to all bundled customer electric rate schedules, except for those schedules or contracts specifically excluded by the Commission.
3. **REVISION DATES:** The disposition of the balances in the respective subaccounts will be determined through the advice letter process or an Application.
4. **RATES:** The rate applicable to PPCBA is set forth in Electric Preliminary Statement Part I.
5. **ACCOUNTING PROCEDURE:** The following entries will be made each month, as applicable, excluding amounts for Revenue Fees and Uncollectible.

The PPCBA has the following subaccounts:

(T)

Disadvantaged Communities Green Tariff (DAC-GT) Subaccount is a two-way balancing account that tracks the annual funding of the program through greenhouse gas (GHG) auction proceeds and public policy revenues compared to costs incurred to implement, operate, maintain, and administer the program. Funding through GHG and public policy revenues is consistent with California Public Utility Commission (CPUC) and California Air Resources Board (CARB) rules, including any prohibition on the use of GHG revenue to fund or administer volumetric discounts.

Community Solar Green Tariff (CS-GT) Subaccount is a two-way balancing account that tracks the annual funding of the program through GHG auction proceeds and public policy revenues compared to costs incurred to implement, operate, maintain, and administer the program. Funding through GHG and public policy revenues is consistent with CPUC and CARB rules, including any prohibition on the use of GHG revenue to fund or administer volumetric discounts.

Disadvantaged Communities Single-Family Solar Homes (DAC-SASH) Subaccount is a balancing account that tracks the authorized funding through Greenhouse Gas (GHG) and public policy revenue against the remittance to Program Administrator to cover the cost of the program.

Public Policy Charge Programs Subaccount is a two-way balancing account that tracks the adopted revenue requirement for (1) San Joaquin Valley Disadvantaged Communities Data Gathering Plan where the program costs are tracked in San Joaquin Valley Disadvantaged Communities Data Gathering Plan Memorandum Account (SJVDAC DGPMA), (2) Net Energy Metering measurement and evaluation costs where the program costs are tracked in Net Energy Metering Balancing Account (NEMBA), (3) San Joaquin Valley Disadvantaged Communities Pilot costs which are tracked in San Joaquin Valley Disadvantaged Communities Pilot Balancing Account (SJVDAC PBA), (4) the program costs for the Behind-the-Meter (BTM) Thermal Storage Program, (5) the incremental administrative and information technology costs implementing the bill protection and transition community solar discount and the resulting discounts authorized for SJVDAC per D.20-04-006, and (6) the electric portion of the revenue shortfall from the Percentage of Income Payment Plan (PIPP) bill cap as recorded in the Percentage of Income Payment Plan Balancing Account – Electric (PIPPBA-E).

(T)

(N)

(N)

(Continued)

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ELECTRIC PRELIMINARY STATEMENT PART HM
PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)

Sheet 5

HM. Public Policy Charge Balancing Account (PPCBA) (Cont'd)

5. ACCOUNTING PROCEDURE (Cont'd):

C. DAC-SASH Subaccount (Cont'd):

- e. A entry equal to interest on the average balance in the account at the beginning of the month and the ending balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

D. Public Policy Charge Programs Subaccount:

- a. A debit entry, as appropriate, to record the transfer of amounts from the SJVDAC DGPMA as approved by the CPUC to record the adopted cost recovery.
- b. A debit entry, as appropriate, to record the transfer of amounts from the NEMBA as approved by the CPUC to record the adopted cost recovery.
- c. A debit entry equal to one-twelfth of the annual authorized revenue requirement (including Revenue Fees and Uncollectible (RF&U) accounts expense) for the San Joaquin Valley Disadvantaged Communities Pilot Projects one-way subaccount.
- d. A debit entry equal to the program costs for the BTM Thermal Storage Program that shall not exceed the authorized budget.
- e. A debit entry to record the transfer of the incremental administrative and information technology costs implementing the bill protection discount and transitional community solar discount and the resulting discounts provided to San Joaquin Valley Disadvantage Communities (including RF&U) from the two-way sub-account of San Joaquin Valley Disadvantaged Communities Pilot Projects.
- f. An annual debit entry equal to the balance transferred from the PIPPBA-E for recovery in rates. (N)
- g. A debit or credit entry, as appropriate, to record the transfer of amounts from other accounts to the PPCBA for recovery in rates, upon approval by the CPUC. (N)
- h. A credit entry equal to public policy revenues to recover the adopted costs associated with the programs tracked in this subaccount. (T)
- i. A debit or credit entry equal to interest on the average balance in the account at the beginning of the month and the ending balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. (T)

E. RUBA Subaccount:

- a. An annual debit or credit entry, as appropriate, equal to the balance transferred from the Non-Generation Subaccount of the RUBA-E for recovery in rates.
- b. An annual debit entry equal to the AMP debt forgiveness transferred from the AMP Subaccount of the RUBA-E for recovery in rates.

(Continued)



ELECTRIC PRELIMINARY STATEMENT PART JL

Sheet 1

(N)

PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT - ELECTRIC (PIPPBA-E)

(N)

JL. PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT - ELECTRIC
(PIPPBA-E)

(N)

1. PURPOSE: The purpose of the Percentage of Income Payment Plan Balancing Account – Electric (PIPPBA-E), a two-way balancing account, is to record and track the electric portion of the revenue shortfall, or discount, from the PIPP bill cap pursuant to Decision (D.) 21-10-012. The PIPP bill discounts should be either (a) the difference between the bill cap and the actual bill, or b) zero if the actual bill is lower than the bill cap, and are net of California Alternate Rates for Energy (CARE) discounts, i.e. the discounted amount in excess of the CARE discount.
2. APPLICABILITY: The PIPPBA-E shall apply to all eligible electric residential customers.
3. REVISION DATE: Distribution of the balances of the PIPPBA-E will be in Electric Public Purpose Program rates on an equal percent of total revenues basis through the Public Policy Charge Balancing Account on an annual basis as part of PG&E's Annual Electric True-up (AET) advice letter filing.
4. RATES: The PIPPBA does not have a rate component.
5. ACCOUNTING PROCEDURE: PG&E shall maintain the PIPPBA by making the following entries, net of Revenue Fees and Uncollectibles (RF&U), to the account at the end of each month, or as applicable:
 - a. A debit entry equal to the revenue shortfall that would have been collected had the customer(s) not been eligible for the PIPP bill cap;
 - b. A credit entry to transfer the balance or amounts to the PPCBA for true-up in rates;
 - c. A debit or credit entry to transfer amounts in this account to other accounts, or amounts from other accounts to this account upon approval by the Commission; and
 - d. A debit or credit entry, as appropriate, equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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ELECTRIC PRELIMINARY STATEMENT PART JM

Sheet 1

(N)

PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT - ELECTRIC (PIPPMA-E)

(N)

JM. PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT - ELECTRIC
(PIPPMA-E)

(N)

1. **PURPOSE:** The purpose of the Percentage of Income Payment Plan Memorandum Account – Electric (PIPPMA-E) is to track the incremental administrative costs of the PIPP pilots pursuant to Decision (D.) 21-10-012. These costs are incurred solely for the purpose of implementing the PIPP pilots and do not include costs that would have been incurred in the course of administering the CARE program or other existing responsibilities of the utilities or CCAs. General costs that cannot be attributed specifically to either providing electric or gas service will be allocated according to the currently adopted electric/gas split used for administrative costs for the California Alternate Rates for Energy (CARE) Program.
2. **APPLICABILITY:** The PIPPMA-E shall apply to all electric customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balance in this account will be in Electric Public Purpose Program rates on an equal percent of total revenues basis through the Public Policy Charge Balancing Account and addressed in a future cost recovery proceeding, separate application, or as otherwise authorized by the Commission.
4. **RATES:** The PIPPMA does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the PIPPMA by making the following entries, net of Revenue Fees and Uncollectibles (RF&U), to the account at the end of each month, or as applicable:
 - a. A debit entry equal to the actual incremental administrative costs to implement the PIPP Pilot.
 - b. A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred if any. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment.
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission.
 - d. A debit or credit entry, as appropriate, equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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Attachment 2

Pro Forma Tariffs

ELECTRIC SCHEDULE E-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 1

APPLICABILITY: The Percentage of Income Payment Plan (PIPP) pilot program is a four-year pilot program subject to a maximum participation cap of 5,000 PG&E residential gas or electric customers, as set forth in California Public Utilities Commission (CPUC or Commission) Decision (D.) 21-10-012. The purpose of the PIPP pilot is to test whether a PIPP program can (i) reduce the number of low-income households at risk of disconnection, (ii) encourage participation in energy saving and energy management programs, (iii) increase access to essential levels of energy service, and (iv) control PIPP program costs.

The PIPP pilot program is applicable only to residential gas and electric customers of Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, and Southern California Gas Company, as well as the Community Choice Aggregation (CCA) service providers in California who elect to participate in the PIPP pilot program in the service territories of the above investor-owned utilities.

Due to service territory differences across the investor-owned utilities, or the provision of gas versus electric service by each utility company, it is possible for a PIPP customer to be served by two separate utility companies. The overall capped PIPP energy bill will be split into separate gas versus electric bill caps, and separate CCA versus investor-owned utility capped portions of the bill. PIPP bill caps may not be available in local or municipal utility service areas.

Statewide, up to 15,000 customers may participate in the pilots. The following pilot participation caps will apply by utility: Pacific Gas and Electric Company (PG&E) 5,000; Southern California Gas Company (SoCalGas) 5,000; Southern California Edison Company (SCE) 4,000; and San Diego Gas & Electric Company (SDG&E) 1,000. Target enrollment levels for each utility's pilot effective six months after pilot enrollment begins: PG&E 2,500; SoCalGas 2,500; SCE 2,000; and SDG&E 500.

Schedule E-PIPP is applicable to single-phase and polyphase residential service in single-family dwellings and in flats and apartments separately metered by PG&E, and to farm service on the premises operated by the person whose residence is supplied through the same meter, where the applicant qualifies for California Alternate Rates for Energy (CARE) under Schedule D-CARE and the CARE eligibility and certification criteria set forth in Electric Rule 19.1, and the PIPP eligibility and certification criteria set forth in Electric Rule 19.5.

PIPP service is available only on Schedule D-CARE and only on the otherwise applicable Schedules E-1, E-TOU-C, and EV2-A, pursuant to D.21-10-012 directing that utilities may limit PIPP pilot participation to customers enrolled in the most commonly enrolled residential rates. Further, PIPP service is not available to a master metered operator and its sub-metered tenants, Direct Access (DA) service, Net Energy Metering (NEM) service, any customer without a Smart Meter, any customer billed in PG&E's Advanced Billing System (ABS), any customer on PG&E's Budget Billing program, or any customer enrolled in any other pilot. A PIPP customer terminating CARE service will be removed from the PIPP pilot.

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ELECTRIC SCHEDULE E-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 1

PIPP participants may concurrently participate in PG&E's Arrearage Management Program (AMP), which provides specified forgiveness of past due owed bill amounts as set forth in Electric Rule 9, Part G.

PIPP service is available for CCA CARE customers only in those CCA areas which agree to participate in the PIPP pilot. Gas Core Transport Agent (CTA) customers who procure gas service from third party suppliers are categorically ineligible for PIPP. For purposes of the PIPP pilot, PG&E will exclude a customer from eligibility for both gas and electric PIPP service if the customer is ineligible for either gas or electric PIPP service. Please see Schedule G-PIPP and Gas Rule 19.5 for additional details on the terms and conditions of service for eligibility for gas PIPP service.

Schedule E-PIPP is limited to customers who are enrolled in the CARE program and who either (i) are located in one of the top 20 zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium, as shown in Table A below, or (ii) have been disconnected 2 or more times during the 12 months prior to the disconnections moratorium.

TABLE A
PG&E's Top 20 PIPP Eligible Zip Codes

ZIP Code	City Name	County Name
93304	BAKERSFIELD	KERN
93305	BAKERSFIELD	KERN
93306	BAKERSFIELD	KERN
93307	BAKERSFIELD	KERN
93308	BAKERSFIELD	KERN
93309	BAKERSFIELD	KERN
93458	SANTA MARIA	SANTA BARBARA
93702	FRESNO	FRESNO
93705	FRESNO	FRESNO
93706	FRESNO	FRESNO
93722	FRESNO	FRESNO
93726	FRESNO	FRESNO
93727	FRESNO	FRESNO
94509	ANTIOCH	CONTRA COSTA
94533	FAIRFIELD	SOLANO
94565	PITTSBURG	CONTRA COSTA
94590	VALLEJO	SOLANO
95205	STOCKTON	SAN JOAQUIN
95206	STOCKTON	SAN JOAQUIN
95207	STOCKTON	SAN JOAQUIN

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ELECTRIC SCHEDULE E-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 1

Schedule E-PIPP eligibility for customers who have been disconnected 2 or more times during the 12 months prior to the Disconnections Moratorium may take PIPP service in any portion of the PG&E service territory and may occur outside of the top 20 zip codes listed above in Table A but is subject to pilot program limits at 5,000 participants, and PG&E's PIPP recruitment and pilot design objectives.

In addition, D.21-10-012 directed that CCA's receive a proportional share of the 5,000 PIPP participants available to PG&E. Table B sets forth the allocation of PIPP customers to the participating CCA's.

TABLE B
PIPP Pilot Participation Targets of Bundled and Unbundled Customers

Customer Group	Total # of CARE Customers	Ratio of CARE CCA to PG&E Bundled CARE Customers	CCA PIPP Participation Cap
Total CARE Bundled	897,458		
Central Coast Community Energy (3CE)	92,373	10%	515
East Bay Community Energy (EBCE)	126,125	14%	703
MCE	105,299	12%	587
Pioneer Community Energy (PIO)	13,477	2%	76
Redwood Coast Energy Authority (RCEA)	16,556	2%	93
Valley Clean Energy (VCE)	13,078	1%	73
PIPP Pilot Summary			
Total CCA (Unbundled) Participation Target	2,047		
Total PG&E Bundled Participation Target	2,953		
Total PIPP Pilot Participation	5,000		

Table A for the top 20 zip codes and Table B for the CCA allocation of PIPP pilot participation limits were developed in late 2021. Tables A and B may both be adjusted over time during the four-year PIPP pilot as may be required for experimental pilot evaluation or other goals of the PIPP pilot.

TERRITORY: This rate schedule applies everywhere PG&E provides electric service.

RATES: Customers taking service on this rate schedule will receive a maximum monthly PIPP bill cap as set forth in the table below, prior to any applicable taxes and fees. Based on the PIPP participant's household income level, and number of persons in the household, and subject to the PIPP eligibility and certification criteria set forth in Electric Rule 19.5, the PIPP participant will be categorized as falling into either the (a) 0% to 100% of Federal Poverty Guidelines (FPG) group, or (b) the 101% to 200% of FPG group.

Tables C and D below present the PIPP overall bill caps, as well as the breakdown of the overall PIPP bill cap into gas versus electric bill caps, in Table C, and of the

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ELECTRIC SCHEDULE E-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 1

electric bill into generation and non-generation bill caps, in Table D, for participating CCA customers.

The gas and electric PIPP bill splits shown in Table C will be used by all California utilities. Conversely, the electric generation and non-generation PIPP bill splits shown in Table D are specific to PG&E's territory, and other California electric utilities may use a different PIPP bill split for electric generation and non-generation bill caps.

TABLE C
Statewide Electric & Gas PIPP Bill Caps

Ratio of Bill Charges (Electric/Gas)	75/25
0-100% of FPG PIPP Cap	\$37.00
Electric Bill Cap	\$28.00
Gas Bill Cap	\$9.00
101-200% of FPG PIPP Cap	\$109.00
Electric Bill Cap	\$82.00
Gas Bill Cap	\$27.00

TABLE D
PG&E Territory Electric Generation and Non-Generation PIPP Bill Caps

Ratio of Bill Charges (Electric/Gas)	38/62
0-100% of FPG Electric PIPP Bill Cap	\$28.00
Electric Generation Cap	\$11.00
Electric Non-Generation Cap	\$17.00
101-200% of FPG Electric PIPP Bill Cap	\$82.00
Electric Generation Cap	\$31.00
Electric Non-Generation Cap	\$51.00

The above PIPP bill caps will be updated each year as CARE income guidelines set forth in Electric Rule 19.1 are updated. The overall CARE income guidelines for households of three persons are used to set the two PIPP bill caps shown above. The overall PIPP bill cap is \$37 for PIPP participants verifying household income of 0% to 100% of FPG and is \$109 for PIPP participants in the 101-200% of FPG category. All customers otherwise eligible for CARE by being 0% to 200% of FPG will be assumed to be in the 101% to 200% of FPG category unless proof is provided of 0-100% of FPG eligibility.

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ELECTRIC SCHEDULE E-PIPP

PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 1

For the PIPP pilot, the maximum household energy bill is first established, and is then split between gas and electric service. The electric bill is then split into a PG&E portion and a CCA generation portion, where applicable for participating CCA PIPP pilot customers.

The PIPP customer's monthly bill will be the lower of the PIPP electric bill cap, or the customer's otherwise applicable monthly CARE bill.

Two times per year, the otherwise applicable monthly CARE bill will be the bill after the application of the electric California Climate Credit.

The CARE discount will be calculated for CCA customers based on the total charges as if they were subject to bundled service rates.

The bill discount attributable to participation in the PIPP pilot is equal to the CARE bill prior to any utility user taxes or other taxes and fees, and the PIPP bill prior to any utility user taxes or other taxes and fees. The lower of the monthly PIPP bill or the monthly CARE bill will be the basis for the application of utility user taxes or other taxes and fees.

The PIPP discounts will be applied as line-item bill discounts and as a residual reduction to distribution charges, after D-CARE customers are exempted from the Wildfire Fund Charge and the CARE surcharge portion of the public purpose program charge used to fund the CARE discount. PG&E will track PG&E PIPP electric bill discounts, and will remit PIPP bill discounts associated with CCA generation rates after posting to applicable balancing accounts and recovering such PIPP PG&E and PIPP CCA generation bill discounts in Public Purpose Program rates in the following year as set forth in Electric Preliminary Statement Part JL, Percentage of Income Payment Plan Balancing Account – Electric (PIPPBA-E), to record and track the electric portion of the revenue shortfall, or discount, from the PIPP bill cap pursuant to D.21-10-012. Remittances to CCA's of PIPP bill discounts will be conducted in accordance with the practices set forth for the AMP in Commission Resolution E-5114.

In addition, administrative costs incurred to implement the PIPP pilot program will be recorded in the Electric Preliminary Statement Part JM, Percentage of Income Payment Plan Memorandum Account – Electric (PIPPMA-E), to track the incremental administrative costs of the PIPP pilots pursuant to D.21-10-012.

(Continued)

ELECTRIC SCHEDULE E-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 2

**SPECIAL
CONDITIONS:**

1. OTHERWISE APPLICABLE SCHEDULE: The Special Conditions of the Customer's otherwise applicable rate schedule will apply to this schedule.

2. ELIGIBILITY: To be eligible to participate in E-PIPP, customers must meet all the requirements provided in the applicability section above and have received direct outreach by PG&E, a participating CCA, or a community-based organization authorized to act on behalf of PG&E and/or the participating CCA to enroll in the PIPP pilot (or "PIPP Pilot Implementers"). Outreach and enrollment into the PIPP pilot will be in accordance with PG&E's PIPP recruitment and pilot design objectives.

As set forth above, DA customers are not eligible for PIPP. Only bundled, participating electric CCA areas, and Transitional Bundled Service Customers are eligible for PIPP. From among the eligible CARE population, PIPP Pilot Implementers will recruit participants into the PIPP pilot as may be appropriate to meet pilot experimental design and evaluation objectives. PIPP customers seeking the PIPP bill caps associated with 0-100% of FPG status must certify their eligibility for such categorization as set forth in Electric Rule 19.5.

3. MAINTAINING PIPP PILOT STATUS: PIPP pilot participants must maintain all pilot requirements to remain in the PIPP pilot, including all CARE programmatic requirements. Additionally, if a PIPP pilot participant moves within the same utility service territory (and establishes service at the new location within 30 days of terminating service at the previous location), they will remain enrolled in the pilot. Otherwise, the customer will be removed and will receive notice of how to apply to participate in the PIPP pilot in other service territories or their current service territory if service is established at a new location more than 30 days from terminating service at the previous location.

PIPP pilot participants who are removed from the PIPP pilot due to not maintaining all requirements may be subject to the waitlist process described in Special Condition 4.

4. WAITLIST PROCESS: Eligible customers who have received direct outreach from PIPP Pilot Implementers (as defined in the ELIGIBILITY section above) and have completed the applicable enrollment process for the PIPP pilot will be placed on a wait list if PG&E or a participating CCA has reached its allocated participation cap. In addition, PG&E may place PIPP customers facing disconnection, or customers where a new CCA other than those listed above in Table B elects to participate in the PIPP pilot, on the wait list only if slots are available and they are selected.

Eligible customers will be notified if they have been placed on the wait list and may subsequently receive follow-up outreach if slots in the PIPP pilot becomes available and they are selected.

5. INDEPENDENT EVALUATOR. D.21-10-012 directs that an independent consulting firm be contracted to perform an evaluation of the PIPP pilot. Subject to guidance from the Independent Evaluator, the Commission, or agreement by stakeholders, recruitment may or may not use a waitlist process (as described in

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ELECTRIC SCHEDULE E-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 2

Special Condition 4) to backfill any portion of the 5,000 participation slots. In addition, participation may be recruited for both the top 20 zip codes and outside of the top 20 zip codes, or among the participating CCA's, as may be needed for pilot experimental design and analysis of the PIPP pilot using the evaluation criteria specified in D.21-10-012. Further, other such adjustments as may be reasonable may be undertaken. For example, evaluation of a range of variables and alternate PIPP program parameters may require an experimental design that may set goals or limits upon customer recruitment attributes to achieve as robust and statistically valid an analytical result or conclusion as possible.

An analysis report by the independent Evaluator is due within 25 months of the approval of all PIPP implementation advice letters based on the first 18 months of the pilot and may contain recommendations for program revisions that may modify various attributes of the PIPP pilot. Such modifications may occur during the four years of the PIPP pilot, and other PIPP modifications may occur as the Commission considers the overall future of PIPP after the completion of the four-year pilot.

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GAS SCHEDULE G-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 2

APPLICABILITY: The Percentage of Income Payment Plan (PIPP) pilot program is a four-year pilot program subject to a maximum participation cap of 5,000 PG&E residential gas or electric customers, as set forth in California Public Utilities Commission (CPUC or Commission) Decision (D.) 21-10-012. The purpose of the PIPP pilot is to test whether a PIPP program can (i) reduce the number of low-income households at risk of disconnection, (ii) encourage participation in energy saving and energy management programs, (iii) increase access to essential levels of energy service, and (iv) control PIPP program costs.

The PIPP pilot program is applicable only to residential gas and electric customers of Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, and Southern California Gas Company, as well as the Community Choice Aggregation (CCA) electric service providers in California who elect to participate in the PIPP pilot program in the service territories of the above investor-owned utilities.

Due to service territory differences across the investor-owned utilities, or the provision of gas versus electric service by each utility company, it is possible for a PIPP customer to be served by two separate utility companies. The overall capped PIPP energy bill will be split into separate gas versus electric bill caps, and separate CCA versus investor-owned utility capped portions of the electric bill. PIPP bill caps may not be available in local or municipal utility service areas.

Statewide, up to 15,000 customers may participate in the pilots. The following pilot participation caps will apply by utility: Pacific Gas and Electric Company (PG&E) 5,000; Southern California Gas Company (SoCalGas) 5,000; Southern California Edison Company (SCE) 4,000; and San Diego Gas & Electric Company (SDG&E) 1,000. Target enrollment levels for each utility's pilot effective six months after pilot enrollment begins: PG&E 2,500; SoCalGas 2,500; SCE 2,000; and SDG&E 500.

Schedule G-PIPP is applicable to residential gas service in single-family dwellings and in flats and apartments separately metered by PG&E, and to gas premises which meet the applicability criteria set forth in residential gas service Schedule G-1, where the applicant qualifies for California Alternate Rates for Energy (CARE) under gas Schedule GL-1 and the CARE eligibility and certification criteria set forth in Gas Rule 19.1, and the PIPP eligibility and certification criteria set forth in Gas Rule 19.5. CARE gas customers who procure gas supply from a party other than PG&E by taking Schedule GL-1 service in conjunction with Schedule G-CT—Core Gas Aggregation Service, are categorically ineligible for PIPP participation.

PIPP service is available only on Schedule GL-1 pursuant to D.21-10-012 directing that utilities may limit PIPP pilot participation to customers enrolled in the most commonly enrolled residential rates. Further, PIPP service is not available to a master metered operator and its sub-metered tenants, any customer without a Smart Meter, any customer billed in PG&E's Advanced Billing System (ABS), any customer on PG&E's Budget Billing program, or any customer enrolled in any other pilot. A PIPP customer terminating CARE service will be removed from the PIPP pilot.



GAS SCHEDULE G-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 2

PIPP participants may concurrently participate in PG&E's Arrearage Management Program (AMP), which provides specified forgiveness of past due owed bill amounts as set forth in Gas Rule 9, Part G.

PIPP service is available for electric CCA CARE customers only in those CCA areas which agree to participate in the PIPP pilot. Gas Core Transport Agent (CTA) customers who procure gas service from third party suppliers are categorically ineligible for PIPP. For purposes of the PIPP pilot, PG&E will exclude a customer from eligibility for both gas and electric PIPP service if the customer is ineligible for either gas or electric PIPP service. Please see Gas Rule 19.5 for additional details on the terms and conditions of service for eligibility for gas PIPP service.

Schedule G-PIPP is limited to customers who are enrolled in the CARE program and who either (i) are located in one of the top 20 zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium, as shown in Table A below, or (ii) have been disconnected 2 or more times during the 12 months prior to the disconnections moratorium.

TABLE A
PG&E's Top 20 PIPP Eligible Zip Codes

ZIP Code	City Name	County Name
93304	BAKERSFIELD	KERN
93305	BAKERSFIELD	KERN
93306	BAKERSFIELD	KERN
93307	BAKERSFIELD	KERN
93308	BAKERSFIELD	KERN
93309	BAKERSFIELD	KERN
93458	SANTA MARIA	SANTA BARBARA
93702	FRESNO	FRESNO
93705	FRESNO	FRESNO
93706	FRESNO	FRESNO
93722	FRESNO	FRESNO
93726	FRESNO	FRESNO
93727	FRESNO	FRESNO
94509	ANTIOCH	CONTRA COSTA
94533	FAIRFIELD	SOLANO
94565	PITTSBURG	CONTRA COSTA
94590	VALLEJO	SOLANO
95205	STOCKTON	SAN JOAQUIN
95206	STOCKTON	SAN JOAQUIN
95207	STOCKTON	SAN JOAQUIN

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GAS SCHEDULE G-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 2

Schedule G-PIPP eligibility for customers who have been disconnected 2 or more times during the 12 months prior to the Disconnections Moratorium may take PIPP service in any portion of the PG&E service territory and may occur outside of the top 20 zip codes listed above in Table A but is subject to pilot program limits at 5,000 participants, and PG&E's PIPP recruitment and pilot design objectives.

In addition, D.21-10-012 directed that electric CCA's receive a proportional share of the 5,000 PIPP participants available to PG&E. Table B sets forth the allocation of PIPP customers to the participating CCA's.

TABLE B
PIPP Pilot Participation Targets of Bundled and Unbundled Customers

Customer Group	Total # of CARE Customers	Ratio of CARE CCA to PG&E Bundled CARE Customers	CCA PIPP Participation Cap
Total CARE Bundled	897,458		
Central Coast Community Energy (3CE)	92,373	10%	515
East Bay Community Energy (EBCE)	126,125	14%	703
MCE	105,299	12%	587
Pioneer Community Energy (PIO)	13,477	2%	76
Redwood Coast Energy Authority (RCEA)	16,556	2%	93
Valley Clean Energy (VCE)	13,078	1%	73
PIPP Pilot Summary			
Total CCA (Unbundled) Participation Target	2,047		
Total PG&E Bundled Participation Target	2,953		
Total PIPP Pilot Participation	5,000		

Table A for the top 20 zip codes and Table B for the CCA allocation of PIPP pilot participation limits were developed in late 2021. Tables A and B may both be adjusted over time during the four-year PIPP pilot as may be required for experimental pilot evaluation or other goals of the PIPP pilot.

TERRITORY: This rate schedule applies everywhere PG&E provides gas service.

RATES: Customers taking service on this rate schedule will receive a maximum monthly PIPP bill cap as set forth in the table below, prior to any applicable taxes and fees. Based on the PIPP participant's household income level, and number of persons in the household, and subject to the PIPP eligibility and certification criteria set forth in Gas Rule 19.5, the PIPP participant will be categorized as falling into either the (a) 0% to 100% of Federal Poverty Guidelines (FPG) group, or (b) the 101% to 200% of FPG group.

Tables C and D below present the PIPP overall bill caps, as well as the breakdown of the overall PIPP bill cap into gas versus electric bill caps, in Table C, and of the



GAS SCHEDULE G-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 2

electric bill into generation and non-generation bill caps, in Table D, for participating CCA electric customers.

The gas and electric PIPP bill splits shown in Table C will be used by all California utilities. Conversely, the electric generation and non-generation PIPP bill splits shown in Table D are specific to PG&E's territory, and other California electric utilities may use a different PIPP bill split for electric generation and non-generation bill caps.

TABLE C
Statewide Electric & Gas PIPP Bill Caps

Ratio of Bill Charges (Electric/Gas)	75/25
0-100% of FPG PIPP Cap	\$37.00
Electric Bill Cap	\$28.00
Gas Bill Cap	\$9.00
101-200% of FPG PIPP Cap	\$109.00
Electric Bill Cap	\$82.00
Gas Bill Cap	\$27.00

TABLE D
PG&E Territory Electric Generation and Non-Generation PIPP Bill Caps

Ratio of Bill Charges (Electric/Gas)	38/62
0-100% of FPG Electric PIPP Bill Cap	\$28.00
Electric Generation Cap	\$11.00
Electric Non-Generation Cap	\$17.00
101-200% of FPG Electric PIPP Bill Cap	\$82.00
Electric Generation Cap	\$31.00
Electric Non-Generation Cap	\$51.00

The above PIPP bill caps will be updated each year as CARE income guidelines set forth in Gas Rule 19.1 are updated. The overall CARE income guidelines for households of three persons are used to set the two PIPP bill caps shown above. The overall PIPP bill cap is \$37 for PIPP participants verifying household income of 0% to 100% of FPG and is \$109 for PIPP participants in the 101-200% of FPG category. All customers otherwise eligible for CARE by being 0% to 200% of FPG



GAS SCHEDULE G-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 2

will be assumed to be in the 101% to 200% of FPG category unless proof is provided of 0-100% of FPG eligibility.

For the PIPP pilot, the maximum household energy bill is first established, and is then split between gas and electric service. The electric bill is then split into a PG&E portion and a CCA generation portion, where applicable for participating CCA PIPP pilot electric customers.

The PIPP customer's monthly bill will be the lower of the PIPP gas bill cap, or the customer's otherwise applicable monthly gas CARE bill.

Once per year, the otherwise applicable monthly CARE bill will be the bill after the application of the gas California Climate Credit.

The bill discount attributable to participation in the PIPP pilot is equal to the CARE bill prior to any utility user taxes or other taxes and fees, and the PIPP bill prior to any utility user taxes or other taxes and fees. The lower of the monthly PIPP bill or the monthly CARE bill will be the basis for the application of utility user taxes or other taxes and fees.

The PIPP discounts will be applied as line-item bill discounts and as a residual reduction to gas transportation charges. PG&E will recover gas PIPP bill discounts in gas transportation rates in the following year as set forth in Gas Preliminary Statement Part FT, Percentage of Income Payment Plan Balancing Account – Gas (PIPPBA-G), to record and track the gas portion of the revenue shortfall, or discount, from the PIPP bill cap pursuant to D.21-10-012.

In addition, administrative costs incurred to implement the PIPP pilot program will be recorded in the Gas Preliminary Statement Part FU, Percentage of Income Payment Plan Memorandum Account – Gas (PIPPMA-G), to track the incremental administrative costs of the PIPP pilots pursuant to D.21-10-012.

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Vice President, Regulatory Affairs*

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GAS SCHEDULE G-PIPP
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

Sheet 2

**SPECIAL
CONDITIONS:**

1. OTHERWISE APPLICABLE SCHEDULE: The Special Conditions of the Customer's otherwise applicable rate schedule will apply to this schedule.

2. ELIGIBILITY: To be eligible to participate in G-PIPP, customers must meet all the requirements provided in the applicability section above and have received direct outreach by PG&E, a participating electric CCA, or a community-based organization authorized to act on behalf of PG&E and/or the participating CCA to enroll in the PIPP pilot (or "PIPP Pilot Implementers"). Outreach and enrollment into the PIPP pilot will be in accordance with PG&E's PIPP recruitment and pilot design objectives.

As set forth above, CTA gas customers are not eligible for PIPP. Only bundled gas or electric customers, participating electric CCA areas, and electric Transitional Bundled Service Customers are eligible for PIPP. From among the eligible CARE population, PIPP Pilot Implementers will recruit participants into the PIPP pilot as may be appropriate to meet pilot experimental design and evaluation objectives. PIPP customers seeking the PIPP bill caps associated with 0-100% of FPG status must certify their eligibility for such categorization as set forth in Gas Rule 19.5.

3. MAINTAINING PIPP PILOT STATUS: PIPP pilot participants must maintain all pilot requirements to remain in the PIPP pilot, including all CARE programmatic requirements. Additionally, if a PIPP pilot participant moves within the same utility service territory (and establishes service at the new location within 30 days of terminating service at the previous location), they will remain enrolled in the pilot. Otherwise, the customer will be removed and will receive notice of how to apply to participate in the PIPP pilot in other service territories or their current service territory if service is established at a new location more than 30 days from terminating service at the previous location.

PIPP pilot participants who are removed from the PIPP pilot due to not maintaining all requirements may be subject to the waitlist process described in Special Condition 4.

4. WAITLIST PROCESS: Eligible customers who have received direct outreach from PIPP Pilot Implementers (as defined in the ELIGIBILITY section above) and have completed the applicable enrollment process for the PIPP pilot will be placed on a wait list if PG&E or a participating CCA has reached its allocated participation cap. In addition, PG&E may place PIPP customers facing disconnection, or customers where a new CCA other than those listed above in Table B elects to participate in the PIPP pilot, on the wait list only if slots are available and they are selected.

Eligible customers will be notified if they have been placed on the wait list and may subsequently receive follow-up outreach if slots in the PIPP pilot become available and they are selected.

5. INDEPENDENT EVALUATOR. D.21-10-012 directs that an independent consulting firm be contracted to perform an evaluation of the PIPP pilot. Subject to guidance from the Independent Evaluator, the Commission, or agreement by

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PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT

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stakeholders, recruitment may or may not use a waitlist process (as described in Special Condition 4) to backfill any portion of the 5,000 participation slots. In addition, participation may be recruited for both the top 20 zip codes and outside of the top 20 zip codes, or among the participating electric CCA's, as may be needed for pilot experimental design and analysis of the PIPP pilot using the evaluation criteria specified in D.21-10-012. Further, other such adjustments as may be reasonable may be undertaken. For example, evaluation of a range of variables and alternate PIPP program parameters may require an experimental design that may set goals or limits upon customer recruitment attributes to achieve as robust and statistically valid an analytical result or conclusion as possible.

An analysis report by the independent Evaluator is due within 25 months of the approval of all PIPP implementation advice letters based on the first 18 months of the pilot and may contain recommendations for program revisions that may modify various attributes of the PIPP pilot. Such modifications may occur during the four years of the PIPP pilot, and other PIPP modifications may occur as the Commission considers the overall future of PIPP after the completion of the four-year pilot.

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ELECTRIC RULE NO. 19.5 Sheet 1
**PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM ELIGIBILITY AND
 CERTIFICATION RULES FOR INDIVIDUALLY METERED ELECTRIC CUSTOMERS**

A. GENERAL

The Percentage of Income Payment Plan (PIPP) pilot program was established by the Commission in Decision (D.) 21-10-012. The PIPP program is a four-year pilot program available only to a maximum of 5,000 PG&E participants, as set forth in Schedule E-PIPP. To be eligible for the PIPP pilot, customers must be individually metered by PG&E and must participate in the California Alternate Rates for Energy (CARE) program. Please see Schedule E-PIPP for more details.

Qualifying applicants for PIPP shall be placed into the PIPP pilot in accordance with Schedule E-PIPP starting with the first day of the next Billing Cycle after selection for the PIPP pilot program by PG&E, or as otherwise communicated by PG&E.

B. ELIGIBILITY

To be eligible to participate in the PIPP pilot, individually metered applicants/customers must be enrolled in CARE. Additionally, PG&E will have discretion on how to fill the limited 5,000 PIPP slots as set forth in Schedule E-PIPP.

While CARE requires applicants to verify only that household income and number of persons in the household is between 0-200% of the Federal Poverty Guidelines (FPG), PIPP participation has a special category for 0-100% of FPG. While PG&E will randomly verify the eligibility of CARE applicants following enrollment, special separate proof of income and eligibility verification must be provided within 90 days for all PIPP participants seeking to be categorized in the 0-100% of FPG group.

Participants who request a bill cap for 101-200% of FPG will be subject to the CARE post-enrollment verification processes. PIPP participants will not be required to verify their income if they have verified their income for CARE within the past two years. Utilities will contract with community-based organizations to provide upfront income verification services for PIPP pilots during pilot intake and enrollment if such community-based organizations currently provide upfront income verification services for CARE and/or Energy Savings Assistance Program (ESAP). The PIPP pilots will rely on the CARE income reverification processes and will not have separate income reverification requirements.

Applicants on PIPP will also be subject to the CARE criteria that households with electric usage above 400% of baseline allowance must provide proof of qualifying household income, including IRS Tax Return Transcripts, agree to participate in the Energy Savings Assistance program, and keep their usage below 600% of baseline allowance to remain enrolled in CARE¹. Applicants may be removed from the CARE program if their monthly electric usage exceeds 600% of baseline allowance.

¹ All CARE eligibility standard and high-usage Post Enrollment Verification (PEV) requests will be frozen for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Electric Rule 1.

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ELECTRIC RULE NO. 19.5 Sheet 1
**PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM ELIGIBILITY AND
 CERTIFICATION RULES FOR INDIVIDUALLY METERED ELECTRIC CUSTOMERS**

B. ELIGIBILITY (Cont'd.)

Total gross annual income for all persons in the applicant's household may not exceed the following:

Number of Persons in Household	Total Gross Annual Household Income (Effective June 1, 2021 to May 31, 2022)
1-2	\$34,840
3	\$43,920
4	\$53,000
5	\$62,080
6	\$71,160
7	\$80,240
8	\$89,320
Each additional member, add:	\$ 9,080

The above income cutoffs by the number of persons in the household are set at 200% of FPG guidelines. To qualify for the PIPP 0-100% of FPG category, a household must provide proof of income of one-half or less of the income cutoffs shown above.

C. CERTIFICATION

1. Individually metered PG&E customers, and other qualifying applicants in individually metered residential dwelling units:

All applicants for CARE certification must fill out and provide to PG&E Application Form No. 01-9077 (English/Spanish), 62-0972 (English/Chinese), 62-0973 (English/Vietnamese). There is no separate application required for the PIPP pilot program, but all PIPP participation will be as directed under the discretion of PIPP Pilot Implementers, based on the maximum cap of 5,000 PG&E PIPP participants, and other considerations as set forth in Schedule E-PIPP.

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ELECTRIC RULE NO. 19.5 Sheet 1
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM ELIGIBILITY AND
CERTIFICATION RULES FOR INDIVIDUALLY METERED ELECTRIC CUSTOMERS

C. CERTIFICATION (Cont'd.)

2. Self-certification:

Self-certification will be used to determine income eligibility for the CARE program, as set forth in Electric Rule 19.1. Customers must sign a statement upon application indicating that PG&E may verify the Customer's eligibility at any time. If verification establishes that the Customer is ineligible, the Customer will be removed from the CARE program and PG&E may render corrective billings.

Self-certification is also applicable to PIPP pilot participants from 101-200% of the FPG. However, self-certification is not available to PIPP applicants seeking the 0-100% of FPG category. These applicants must instead provide documentation within 90 days to prove the household qualifies as 0-100% of FPG. Customers in PIPP failing to provide 0-100% of FPG proof will be defaulted to the 101-200% of FPG category for the PIPP pilot program. In all cases as may be applicable, Customer's ineligible for the CARE or PIPP service rendered may be removed from the CARE or PIPP program and PG&E may render corrective billings.

D. RECERTIFICATION REQUIREMENTS

Certification of individually metered PG&E CARE Customers is valid for a period of two years, or four years for customers that are determined to have a fixed income, except as provided in Section E.

Applicants either suspected of or proven to have provided incorrect information in their application for CARE and for PIPP pilot selection may be required to recertify at any time. Further, PG&E reserves the right to conduct random audits to determine applicants' eligibility. Failure by any party asked to provide proper proof of eligibility will result in disqualification of applicant's eligibility to receive the CARE and PIPP rate. PG&E may rebill Customers removed from the CARE program and PIPP pilot program for previous discounts received for which the participant did not qualify.

Upon PG&E's request that the CARE or PIPP applicant recertify eligibility following the regular expiration date of applicants' eligibility, the applicant will have 90 days to recertify, after which applicants not recertified may lose their eligibility under the CARE and PIPP program.

It is the responsibility of the applicant to immediately notify PG&E when they are no longer eligible for the CARE program.

ELECTRIC RULE NO. 19.5 Sheet 1
**PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM ELIGIBILITY AND
 CERTIFICATION RULES FOR INDIVIDUALLY METERED ELECTRIC CUSTOMERS**

E. MISAPPLICATION OF PIPP OR CARE

Certification for eligibility for the CARE program or PIPP pilot program that is made based upon incorrect information provided by the applicant shall constitute misapplication of PIPP or CARE for the period under which the applicant received PIPP or CARE. PG&E may rebill the account at the customer's/applicant's otherwise-applicable rate schedule for misapplication of PIPP or CARE. This may include billing PIPP participants incorrectly in the 0-100% FPG category at the PIPP bill caps applicable to the 101-200% of FPG category. Such billing shall be for a period up to the most recent three years in accordance with Rule 17.1. However, nothing in Rule 19.5 shall be interpreted as limiting PG&E's rights under any provisions of any applicable law or tariff.

GAS RULE NO. 19.5 Sheet 1
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM ELIGIBILITY AND
CERTIFICATION RULES FOR INDIVIDUALLY METERED GAS CUSTOMERS

A. GENERAL

The Percentage of Income Payment Plan (PIPP) pilot program was established by the Commission in Decision (D.) 21-10-012. The PIPP program is a four-year pilot program available only to a maximum of 5,000 PG&E participants, as set forth in Schedule G-PIPP. To be eligible for the PIPP pilot, customers must be individually metered by PG&E and must participate in the California Alternate Rates for Energy (CARE) program. Please see Schedule G-PIPP for more details.

Qualifying applicants for PIPP shall be placed into the PIPP pilot in accordance with Schedule G-PIPP starting with the first day of the next Billing Cycle after selection for the PIPP pilot program by PG&E, or as otherwise communicated by PG&E.

B. ELIGIBILITY

To be eligible to participate in the PIPP pilot, individually metered applicants/customers must be enrolled in CARE. Additionally, PG&E will have discretion on how to fill the limited 5,000 PIPP slots as set forth in Schedule G-PIPP.

While CARE requires applicants to verify only that household income and number of persons in the household is between 0-200% of the Federal Poverty Level (FPG) guidelines, PIPP participation has a special category for 0-100% of FPG. While PG&E will randomly verify the eligibility of CARE applicants following enrollment, special separate proof of income and eligibility verification must be provided within 90 days for all PIPP participants seeking to be categorized in the 0-100% of FPG group.

Participants who request a bill cap for 101-200% of Federal Poverty Guidelines will be subject to the CARE post-enrollment verification processes. PIPP participants will not be required to verify their income if they have verified their income for CARE within the past two years. Utilities will contract with community-based organizations to provide upfront income verification services for PIPP pilots during pilot intake and enrollment if such community-based organizations currently provide upfront income verification services for CARE and/or Energy Savings Assistance Program (ESAP). The PIPP pilots will rely on the CARE income reverification processes and will not have separate income reverification requirements.

Applicants on PIPP will also be subject to the CARE criteria that households with electric usage above 400% of baseline allowance must provide proof of qualifying household income, including IRS Tax Return Transcripts, agree to participate in the Energy Savings Assistance program, and keep their usage below 600% of baseline allowance to remain enrolled in CARE¹. Applicants may be removed from the CARE program if their monthly electric usage exceeds 600% of baseline allowance.

¹ All CARE eligibility standard and high-usage Post Enrollment Verification (PEV) requests will be frozen for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Electric Rule 1.

(Continued)

GAS RULE NO. 19.5 Sheet 2
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM ELIGIBILITY AND
CERTIFICATION RULES FOR INDIVIDUALLY METERED GAS CUSTOMERS

B. ELIGIBILITY (Cont'd.)

Total gross annual income for all persons in the applicant's household may not exceed the following:

Number of Persons in Household	Total Gross Annual Household Income (Effective June 1, 2021 to May 31, 2022)
1-2	\$34,840
3	\$43,920
4	\$53,000
5	\$62,080
6	\$71,160
7	\$80,240
8	\$89,320
Each additional member, add:	\$ 9,080

The above income cutoffs by the number of persons in the household are set at 200% of FPG guidelines. To qualify for the PIPP 0-100% of FPG category, a household must provide proof of income of one-half or less of the income cutoffs shown above.

C. CERTIFICATION

1. Individually metered PG&E customers, and other qualifying applicants in individually metered residential dwelling units:

All applicants for CARE certification must fill out and provide to PG&E Application Form No. 01-9077 (English/Spanish), 62-0972 (English/Chinese), 62-0973 (English/Vietnamese). There is no separate application required for the PIPP pilot program, but all PIPP participation will be as directed under the discretion of PIPP Pilot Implementers, based on the maximum cap of 5,000 PG&E PIPP participants, and other considerations as set forth in Schedule G-PIPP.

(Continued)

Advice
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

GAS RULE NO. 19.5 Sheet 4
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM ELIGIBILITY AND
CERTIFICATION RULES FOR INDIVIDUALLY METERED GAS CUSTOMERS

C. CERTIFICATION (Cont'd.)

2. Self-certification:

Self-certification will be used to determine income eligibility for the CARE program, as set forth in Gas Rule 19.1. Customers must sign a statement upon application indicating that PG&E may verify the Customer's eligibility at any time. If verification establishes that the Customer is ineligible, the Customer will be removed from the CARE program and PG&E may render corrective billings.

Self-certification is also applicable to PIPP pilot participants from 101-200% of the FPG. However, self-certification is not available to PIPP applicants seeking the 0-100% of FPG category. These applicants must instead provide documentation within 90 days to prove the household qualifies as 0-100% of FPG. Customers in PIPP failing to provide 0-100% of FPG proof will be defaulted to the 101-200% of FPG category for the PIPP pilot program. In all cases as may be applicable, Customer's ineligible for the CARE or PIPP service rendered may be removed from the CARE or PIPP program and PG&E may render corrective billings.

D. RECERTIFICATION REQUIREMENTS

Certification of individually metered PG&E CARE Customers is valid for a period of two years, or four years for customers that are determined to have a fixed income, except as provided in Section E.

Applicants either suspected of or proven to have provided incorrect information in their application for CARE and for PIPP pilot selection may be required to recertify at any time. Further, PG&E reserves the right to conduct random audits to determine applicants' eligibility. Failure by any party asked to provide proper proof of eligibility will result in disqualification of applicant's eligibility to receive the CARE and PIPP rate. PG&E may rebill Customers removed from the CARE program and PIPP pilot program for previous discounts received for which the participant did not qualify.

Upon PG&E's request that the CARE or PIPP applicant recertify eligibility following the regular expiration date of applicants' eligibility, the applicant will have 90 days to recertify, after which applicants not recertified may lose their eligibility under the CARE and PIPP program.

It is the responsibility of the applicant to immediately notify PG&E when they are no longer eligible for the CARE program.

Advice
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs
Robert S. Kenney

Date Filed
Effective
Resolution

GAS RULE NO. 19.5 Sheet 4
PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM ELIGIBILITY AND
CERTIFICATION RULES FOR INDIVIDUALLY METERED GAS CUSTOMERS

E. MISAPPLICATION OF PIPP OR CARE

Certification for eligibility for the CARE program or PIPP pilot program that is made based upon incorrect information provided by the applicant shall constitute misapplication of PIPP or CARE for the period under which the applicant received PIPP or CARE. PG&E may rebill the account at the customer's/applicant's otherwise-applicable rate schedule for misapplication of PIPP or CARE. This may include billing PIPP participants incorrectly in the 0-100% FPG category at the PIPP bill caps applicable to the 100-200% of FPG category. Such billing shall be for a period up to the most recent three years in accordance with Rule 17.1. However, nothing in Rule 19.5 shall be interpreted as limiting PG&E's rights under any provisions of any applicable law or tariff.

Advice
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs
Robert S. Kenney

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Attachment 3

Redline Tariff Revisions



ELECTRIC PRELIMINARY STATEMENT PART HM
PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)

Sheet 1

HM. Public Policy Charge Balancing Account (PPCBA)

1. **PURPOSE:** The purpose of the Public Policy Charge Balancing Account (PPCBA) is to track revenues and actual costs incurred to implement adopted programs that may be funded through public policy funds.
2. **APPLICABILITY:** The subaccounts will apply to all bundled customer electric rate schedules, except for those schedules or contracts specifically excluded by the Commission.
3. **REVISION DATES:** The disposition of the balances in the respective subaccounts will be determined through the advice letter process or an Application.
4. **RATES:** The rate applicable to PPCBA is set forth in Electric Preliminary Statement Part I.
5. **ACCOUNTING PROCEDURE:** The following entries will be made each month, as applicable, excluding amounts for Revenue Fees and Uncollectible.

The PPCBA has ~~nine~~ the following subaccounts:

Disadvantaged Communities Green Tariff (DAC-GT) Subaccount is a two-way balancing account that tracks the annual funding of the program through greenhouse gas (GHG) auction proceeds and public policy revenues compared to costs incurred to implement, operate, maintain, and administer the program. Funding through GHG and public policy revenues is consistent with California Public Utility Commission (CPUC) and California Air Resources Board (CARB) rules, including any prohibition on the use of GHG revenue to fund or administer volumetric discounts.

Community Solar Green Tariff (CS-GT) Subaccount is a two-way balancing account that tracks the annual funding of the program through GHG auction proceeds and public policy revenues compared to costs incurred to implement, operate, maintain, and administer the program. Funding through GHG and public policy revenues is consistent with CPUC and CARB rules, including any prohibition on the use of GHG revenue to fund or administer volumetric discounts.

Disadvantaged Communities Single-Family Solar Homes (DAC-SASH) Subaccount is a balancing account that tracks the authorized funding through Greenhouse Gas (GHG) and public policy revenue against the remittance to Program Administrator to cover the cost of the program.

Public Policy Charge Programs Subaccount is a two-way balancing account that tracks the adopted revenue requirement for (1) San Joaquin Valley Disadvantaged Communities Data Gathering Plan where the program costs are tracked in San Joaquin Valley Disadvantaged Communities Data Gathering Plan Memorandum Account (SJVDAC DGPM), (2) Net Energy Metering measurement and evaluation costs where the program costs are tracked in Net Energy Metering Balancing Account (NEMBA), (3) San Joaquin Valley Disadvantaged Communities Pilot costs which are tracked in San Joaquin Valley Disadvantaged Communities Pilot Balancing Account (SJVDAC PBA), (4) the program costs for the Behind-the-Meter (BTM) Thermal Storage Program, ~~and~~ (5) the incremental administrative and information technology costs implementing the bill protection and transition community solar discount and the resulting discounts authorized for SJVDAC per D.20-04-006, and (6) the electric portion of the revenue shortfall from the Percentage of Income Payment Plan (PIPP) bill cap as recorded in the Percentage of Income Payment Plan Balancing Account – Electric (PIPPBA-E).

(Continued)

Advice	6308-E	Issued by	Submitted	September 1, 2021
Decision	18-06-027	Robert S. Kenney	Effective	October 1, 2021
		Vice President, Regulatory Affairs	Resolution	



ELECTRIC PRELIMINARY STATEMENT PART HM
PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)

Sheet 5

HM. Public Policy Charge Balancing Account (PPCBA) (Cont'd)

5. ACCOUNTING PROCEDURE (Cont'd):

C. DAC-SASH Subaccount (Cont'd):

- e. A entry equal to interest on the average balance in the account at the beginning of the month and the ending balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

D. Public Policy Charge Programs Subaccount:

- a. A debit entry, as appropriate, to record the transfer of amounts from the SJVDAC DGPMA as approved by the CPUC to record the adopted cost recovery.
- b. A debit entry, as appropriate, to record the transfer of amounts from the NEMBA as approved by the CPUC to record the adopted cost recovery.
- c. A debit entry equal to one-twelfth of the annual authorized revenue requirement (including Revenue Fees and Uncollectible (RF&U) accounts expense) for the San Joaquin Valley Disadvantaged Communities Pilot Projects one-way subaccount.
- d. A debit entry equal to the program costs for the BTM Thermal Storage Program that shall not exceed the authorized budget.
- e. A debit entry to record the transfer of the incremental administrative and information technology costs implementing the bill protection discount and transitional community solar discount and the resulting discounts provided to San Joaquin Valley Disadvantage Communities (including RF&U) from the two-way sub-account of San Joaquin Valley Disadvantaged Communities Pilot Projects.
- f. An annual debit entry equal to the balance transferred from the PIPPBA-E for recovery in rates.
- g. A debit or credit entry, as appropriate, to record the transfer of amounts from other accounts to the PPCBA for recovery in rates, upon approval by the CPUC.
- f.h. A credit entry equal to public policy revenues to recover the adopted costs associated with the programs tracked in this subaccount.
- g-i. A debit or credit entry equal to interest on the average balance in the account at the beginning of the month and the ending balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

E. RUBA Subaccount:

- a. An annual debit or credit entry, as appropriate, equal to the balance transferred from the Non-Generation Subaccount of the RUBA-E for recovery in rates.
- b. An annual debit entry equal to the AMP debt forgiveness transferred from the AMP Subaccount of the RUBA-E for recovery in rates.

(Continued)

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP Energy Management Service Engineers and Scientists of California	Pioneer Community Energy Public Advocates Office
Alta Power Group, LLC Anderson & Poole		Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc. SCD Energy Solutions San Diego Gas & Electric Company
Atlas ReFuel BART	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF International Power Technology	SPURR San Francisco Water Power and Sewer Semptra Utilities
Barkovich & Yap, Inc. Braun Blasing Smith Wynne, P.C. California Cotton Ginners & Growers Assn California Energy Commission		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.
California Hub for Energy Efficiency Financing	Intertie Intestate Gas Services, Inc. Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	Modesto Irrigation District NLine Energy, Inc. NRG Solar	
Chevron Pipeline and Power City of Palo Alto	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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		