

**PUBLIC UTILITIES COMMISSION**  
505 VAN NESS AVENUE



April 18, 2022

**Advice Letters: PG&E 6496-E  
SCE 4709-E-A, SDG&E 3950-E**

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**Subject: Disposition of PG&E AL 6496-E, SCE AL 4709-E-A, and SDG&E AL 3950-E establishing program parameters and cost of the Emergency Load Reduction Program**

Dear Mr. Anderson, Mr. Dietz, and Ms. Menon,

Pursuant to D.21-12-015 Ordering Paragraph (OP) 38, PG&E, SCE and SDG&E (collectively the IOUs) filed individual Advice Letters on February 4, 2022: PG&E Advice Letter **6496-E**, SCE Advice Letter **4709-E-A**, and SDG&E Advice Letter **3950-E** establishing program parameters and cost of the Residential ELRP pilot program.

Per its review and disposition (see Attachment 1), the Energy Division (ED) has determined that the Advice Letters, as amended by the IOUs, are in compliance with D. 21-12-015 and are approved, effective today.

As part of this approval, ED requests each IOU to submit reports to Energy Division on their plans for marketing, education, outreach, and event notification to comply with the marketing-related directives on Page 9 of Attachment 2 of D. 21-12-015. These plans are requested from each IOU within three weeks of this letter on the service list for Rulemaking 20-11-003. (For more information see Page 7)

Additionally, ED takes this opportunity to report its follow up on the Decision directive to work with CAISO to develop an objective set of criteria that triggers Flex Alerts and provides more predictability for stakeholders regarding the conditions and parameters under which CAISO will

PG&E 6496-E, SCE 4709-E-A, SDG&E 3950-E  
April 15, 2022

issue this notice.<sup>1</sup> CAISO has updated its Emergency Alerts protocol, including the Flex Alert, which will be used as the trigger for the Residential ELRP pilot. The protocol can be found in Section 3.3 at: [System Emergency \(caiso.com\)](http://www.aiso.com)<sup>2</sup>

Sincerely,

 FOR

Pete Skala  
Interim Deputy Executive Director for Energy and Climate Policy/  
Interim Director, Energy Division

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R.20-11-003

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<sup>1</sup> D.21-12-015 at 61.

<sup>2</sup> [http://www.aiso.com/Documents/4420\\_DRAFT.pdf](http://www.aiso.com/Documents/4420_DRAFT.pdf)

## Attachment 1

### Energy Division's Review and Disposition

#### Background

The IOUs submitted ALs PG&E 6496-E, SCE 4709-E and SDG&E 3950-E on February 4, 2022, providing details on the program parameters and cost of the residential ELRP pilot as directed by D.21-12-015 (Decision). PG&E provided substitute sheets for 6496-E on March 29, 2022. SDG&E provided substitute sheets for 3950-E on April 14, 2022, and SCE provided a supplement, 4709-E-A on April 15, 2022.

On February 18, 2022, the California Environmental Justice Alliance (CEJA) timely submitted a protest of this advice letter. On February 24, 2022, TURN, OhmConnect and Sonoma Clean Power Authority also timely submitted protests.

#### Disposition

The four parties protested five issues related to:

1. Customer disenrollment from ELRP
2. Dispatch window
3. Marketing & outreach
4. Baseline
5. CCA opt-out and allocation of program cost

Each protested issue is addressed separately below.

##### *1. Customer disenrollment from ELRP*

Three different issues related to customer disenrollment from ELRP were raised.

##### A. How will the IOUs disenroll customers in compliance with the Decision?

CEJA and OhmConnect assert that none of the three IOUs specify precisely how they will disenroll customers from ELRP. Both parties state that PG&E and SDG&E do not even mention how customers can unenroll, and SCE merely refers to Decision language but provides no additional detail.<sup>3</sup> CEJA says the Decision requires that unenrollment be simple. "Customers can choose to opt-out of ELRP at any time and IOUs shall ensure the process is simple and easy for customers using methods such as a 1-click digital form or an email or text message."<sup>4</sup> CEJA asks that Energy Division require IOUs to submit information on how they will ensure the unenrollment process is easy for customers to use and that customers clearly understand that enrollment in another demand response (DR) program will unenroll them from ELRP.

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<sup>3</sup> OhmConnect protest Page 1-2, CEJA protest Page 4

<sup>4</sup> CEJA protest, Page 4

All three IOUs responded to this protest. PG&E, SDG&E, and SCE in their responses assert that the Decision did not require details on disenrollment procedures.

Additionally, SDG&E and SCE provided brief information on their disenrollment processes in their protest responses:

- SDG&E states that it will provide a web-based request form for customer disenrollment and customers can also call SDG&E to disenroll.<sup>5</sup>
- If a customer decides to disenroll, the customer can notify SCE or SCEs residential ELRP implementer, or request disenrollment online. SCE states: “Depending on the volume of requests SCE receives, this may take a few days, but disenrollment will be prompt.”<sup>6</sup>

Energy Division (ED) agrees with the IOUs that the implementation of the Decision does not require a detailed description of the disenrollment process. ED finds that subject ALs comply with the Decision and the above protest sub-item A related to disenrollment is rejected.

#### B. How Long Does Disenrollment Take?

OhmConnect emphasizes the importance of rapid disenrollment. As stated above, OhmConnect asserts that none of the IOUs specify disenrollment details. Further, OhmConnect says: “To that end, it is essential that the Commission require each IOU to specify precisely when a customer will be disenrolled from the residential ELRP pilot.”<sup>7</sup>

As previously noted, the Decision does not require a detailed description of disenrollment in these advice letters. Therefore, this protest is rejected. Still, per ED’s request, PG&E and SCE amended by substitute sheet their ALs to specify a typical timeframe expected for disenrollment.

#### C. Dual Registration Concern

Separately, OhmConnect expressed concern about confusion and delay in the event that an ELRP customer switches into a DR Provider’s (DRP’s) supply-side DR program. According to OhmConnect: “In theory, it is possible for a DRP to upload the customer [leaving ELRP and enrolling into DRP’s program] into DRRS and receive notice that the customer is enrolled in the residential ELRP and is therefore ‘in a conflicting program’ while the IOU works to disenroll the customer from this program.”<sup>8</sup> OhmConnect goes on to assert: “The implementation of a rapid and frictionless customer disenrollment process is absolutely critical to mitigating the potential harms of this pilot on economic demand response programs.”<sup>9</sup>

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<sup>5</sup> SDG&E protest response, Page 4

<sup>6</sup> SCE protest response, Page 4

<sup>7</sup> OhmConnect protest, Page 2

<sup>8</sup> OhmConnect protest, Page 2

<sup>9</sup> OhmConnect protest, Page 1

OhmConnect argues that IOUs should be required to specify that at no point should a DRP receive notice of a “conflict” with ELRP in the CAISO Demand Response Registration System (DRRS) or otherwise experience any delay in completing the customer’s enrollment in the DRP’s program due to the residential pilot.

In its reply, PG&E states that it would not add an ELRP A.6 (residential ELRP) validation check to its existing Rule 24 DRRS location review process.<sup>10</sup> Therefore, PG&E customer locations would not be found invalid during DRRS review as a result of the customer’s participation in ELRP A.6. Similarly, SDG&E says: “If a DRP enrolls a valid location into the DRRS and the customer is enrolled on ELRP A.6, SDG&E will not send DRPs notices that the customer is enrolled in a conflicting program. SDG&E will approve the location and unenroll the customer from ELRP A.6.”<sup>11</sup>

In addition, two IOUs provided more insight into their disenrollment processes involving dual enrollment in their protest responses:

- PG&E stated that in a nightly data process, its systems will automatically un-enroll a customer from ELRP once the customer is identified as enrolled in another supply-side DR program.<sup>12</sup>
- SCE said that once it becomes aware the customer has joined a supply-side DR program, SCE will disenroll the customer and notify them.<sup>13</sup>

ED notes that, per the Decision, ELRP is excluded from Resource Adequacy and does not have CAISO market obligations. That is, ELRP is not a supply-side DR program, and thus, is not expected to effect customer registrations in CAISO DRRS. Given this expectation, along with the replies from the IOUs, ED concludes that OhmConnect has not demonstrated that the IOUs’ disenrollment processes are not in compliance with the Decision. The protest sub-item C related to disenrollment is rejected.

## 2. *Dispatch window*

CEJA disputes the IOUs’ alignment of the ELRP dispatch window with the Flex Alert period of 4 PM to 9 PM. Instead, CEJA calls for a two-hour minimum duration with the IOUs coordinating the timing of each event with the CAISO Flex Alert hours for that particular event. CEJA states that CAISO varies the length of Flex Alert events and the start and end time of events. “While CEJA agrees that it is important to coordinate the hours of Flex Alerts with the residential ELRP, Flex Alerts are not always called for five hours between the hours of 4 PM and 9 PM. Flex Alerts may be called for shorter periods (e.g., a three-hour event between 6 PM and 9 PM on June 18, 2021), for longer periods (e.g., a seven-hour event between 3 PM and 10 PM on October 15, 2020), or for shifted periods (e.g., a five-hour event between 5 PM and 10 PM on June 17, 2021).”<sup>14</sup>

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<sup>10</sup> PG&E protest response, Page 3

<sup>11</sup> SDG&E protest response, Page 4

<sup>12</sup> PG&E protest response, Page 3

<sup>13</sup> SCE protest response, Page 4

<sup>14</sup> CEJA protest, Page 3

Both PG&E and SDG&E reply that the CAISO has committed for 2022 to the 4 PM to 9 PM timeframe for Flex Alert and that it would be rare for the CAISO to use different hours. SDG&E and SCE point out that the IOUs coordinated the 4 PM to 9 PM ELRP pilot dispatch hours in discussions with CAISO, Energy Division staff and each other. PG&E says the static and aligned dispatch hours make for unified education to customers across the ELRP program and the Flex Alert campaign.

ED notes that customer participation in ELRP is voluntary and there are no minimum performance requirements or penalties. Customers would be compensated for any incremental load reduction during an ELRP event regardless of how long the customer's load reduction is maintained.

Consequently, ED finds that CEJA's protest has not demonstrated that the IOU proposed dispatch window is not in compliance with the Decision. The protest is rejected.

### 3. *Marketing outreach*

CEJA protests that none of the IOU Advice Letters described how the IOUs would implement the marketing elements ordered in the Decision. According to CEJA, the Commission required that “[i]n their marketing, education, outreach and event notification efforts focused on the foregoing auto-enrolled customers and customers in disadvantaged communities, the IOUs shall incorporate elements of CEJA’s Just Flex Rewards proposal including both in-language accessibility, and specific outreach for CARE, ESA, FERA and disadvantaged community customers.”<sup>15</sup>

CEJA states further that the Just Flex Rewards-proposed outreach is particularly important given that many low-income customers, and those in disadvantaged communities, are not on CARE or FERA rates, and therefore will not be automatically opted-into the program.

None of the IOUs described plans for incorporating elements of CEJA’s Just Flex Rewards proposal into their outreach to low-income customers and disadvantaged communities except for one sentence in SCE’s advice letter about collaborating with community-based organizations.<sup>16</sup>

CEJA requests that Energy Division require IOUs to submit information on how they will comply with the low-income and disadvantaged community outreach requirements of the decision to ensure that the outreach and marketing incorporates elements of the Just Flex Rewards program.

ED notes that the Decision did not require the IOUs to provide the above information in the AL. SCE also asserts this: “The additional detail and compliance obligations suggested by

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<sup>15</sup> CEJA protest, Page 3

<sup>16</sup> SCE AL 4709-E, Page 7

CEJA have no basis in the Decision and provide no reason to reject the Advice Letter under Rule 7.4.2.”<sup>17</sup>

PG&E and SDG&E provided brief plan overviews in their protest responses:

- SDG&E described preliminary plans for outreach to low-income households in disadvantaged communities which it said were pending finalization of the statewide Flex Alert marketing plan, which will broadly promote residential ELRP. SDG&E says it will leverage a select list of roughly 15 community-based organizations (CBO) in its Energy Solutions Partner Network that specifically reach low-income customers within disadvantaged communities.<sup>18</sup>
- PG&E plans to promote opt-in enrollment among customers in disadvantaged communities by focusing on six cities where over half of this population resides using digital media. PG&E will train contractors in the low-income energy efficiency direct install program about residential ELRP, and also use CBO partners. PG&E plans to ask the Disadvantaged Communities Advisory Group to review their approach.<sup>19</sup>

In terms of CEJA’s request for more information, ED agrees such information would be useful in determining IOU compliance with the Decision’s outreach requirements and requests the three IOUs to submit reports to Energy Division on their plans for marketing, education, outreach, and event notification to comply with the marketing-related directives on Page 9 of Attachment 2 of D.21-12-015. These plans are requested from each IOU within three weeks of this letter on the service list for Rulemaking 20-11-003.

#### 4. *Baselines*

Three different baseline protests are addressed here:

##### A. One Statewide Baseline Method

CEJA protests the three different baseline methodologies proposed for use across the three IOU territories. CEJA states that the three different baselines will be difficult for customers to understand and will make the program less accessible, especially for customers in disadvantaged communities. It could lead to lower participation, CEJA says. CEJA asks how the statewide Flex Alert marketing can address the different methodologies and suggests that customers receiving marketing information from multiple IOUs will be confused.

SCE and SDG&E in their responses point out that Ordering Paragraph 39 specifically gives the utilities discretion to determine the proper baseline. SDG&E notes that this same paragraph orders each utility to evaluate its baseline methodology and report on it to the CPUC. Further, SDG&E asserts that statewide marketing will not include detailed information about each IOU’s baseline. Both PG&E and SDG&E say it is unlikely that a

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<sup>17</sup> SCE protest response, Page 4

<sup>18</sup> SDG&E protest response, Page 2-3

<sup>19</sup> PG&E protest response, Page 2-3

customer living in one IOU service territory will receive marketing information from a different IOU.

ED agrees with the points made by the three IOUs and rejects CEJA's protest in sub-item A as it fails to show that the subject ALs do not comply with the Decision.

#### B. SDG&E Baseline

TURN protested that SDG&E's selected baseline will not provide the most accurate results, which could lead to customer dissatisfaction, and fail to check overpayments to free riders. TURN cites SDG&E's own consultant report produced by Demand Side Analytics which TURN says concludes that "the adjusted 3 of 5 baseline is the most accurate and least biased, providing both the most accurate estimate of aggregate load reductions and the most fair payment to individual customers."<sup>20</sup>

TURN goes on to say that testimonies and briefs submitted in the rulemaking leading up to the Decision explained at length why a day-of baseline adjustment was vital for temperature-sensitive load. "In brief a system-wide generation shortage is most likely to occur during an extreme heat wave, when air conditioning load greatly increases system demand. The very fact of an extreme temperature condition means that residential customers, whose air conditioning load contributes to peak demand, are very likely to use considerably more electricity on that peak day. Any baseline developed by considering historical load during the previous five to 10 days is very likely to underestimate actual customer demand during the day of the triggered emergency. With a lower baseline than what would have been the actual consumption absent any load shifting or load reduction, the customers' "calculated" load reduction will be less than the actual load reduction. Customers will thus receive lower incentives than warranted, or no incentive at all."<sup>21</sup>

TURN notes that a day-of adjustment could reduce payments to free riders such as customers who depart their home during an event day for unrelated reasons and would otherwise be rewarded for having zero consumption without actually responding to the program. TURN also rejects SDG&E's reasoning that an unadjusted baseline is simpler to explain to customers.<sup>22</sup>

In its response, SDG&E agrees with TURN that adjusted baselines are more accurate than unadjusted baselines. However, SDG&E says that based on its experience with a previous Peak Time Rebate program, it is more difficult to explain an adjusted baseline to customers. SDG&E also asserts that TURN overestimates the extent of customer issues that the use of a complex baseline may cause.<sup>23</sup>

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<sup>20</sup> TURN protest, Page 2

<sup>21</sup> TURN protest, Page 3

<sup>22</sup> TURN protest, Page 3

<sup>23</sup> SDG&E protest response, Page 2

Energy Division staff reviewed the Demand Side Analytics materials attached to TURN's protest and met with representatives of Demand Side Analytics to discuss their findings. Staff considered three factors: the cost to ratepayers of aggregated overpayments, the range of errors at the individual customer level, and the tradeoff between precision and simplicity.

According to the Demand Side Analytics findings, submitted as Appendix 1 to TURN's protest: the cost to ratepayers of total aggregated errors appears to be neutral between the adjusted and unadjusted 3 of 5 baselines; the risk of under-compensation of participating customers appears to be slightly higher under the unadjusted baseline than the adjusted baseline, while non-participating customers are unharmed because the program only offers positive credits; and administrative costs are likely to be lower and customer satisfaction higher under the unadjusted baseline than the adjusted baseline.

Given these findings, in addition to the fact, established in sub-item A above, that the Decision gives the IOUs discretion to select their baseline, ED concludes that TURN has not demonstrated that SDG&E's baseline is not in compliance with the Decision, and protest sub-item B is rejected.

### C. IOU Evaluations

In a related item, TURN notes that the Decision ordered the utilities to evaluate the baselines they use after the first program year. TURN asserts that none of the utilities provide information about these evaluation plans. TURN recommends that Energy Division specifically direct the IOUs to:

- Evaluate the relative accuracy of the different baseline methods used in 2022 to develop a single uniform baseline that is accurate and fair for future program years; and
- Assess the efficacy of ELRP program event duration, and incentive calculation. TURN asserts that data show residential customers can better respond to a two-hour event. In terms of incentive calculation, TURN points out that SCE will calculate incentives for each individual hour of the event, while PG&E and SDG&E may aggregate load over the entire event and compare that to the baseline to calculate an incentive payment. TURN says the IOUs should evaluate which of these methods best balances the need for load reductions during critical times versus the desire to avoid paying free-riders.<sup>24</sup>

As established above, the Decision does not require this level of detail in the Advice Letters and TURN has not demonstrated that the ALs are not in compliance with the decision. We reject TURN's protest.

### 5. CCA opt-out and allocation of program cost

Sonoma Clean Power Authority (Sonoma) protests PG&E's advice letter on two grounds. First, Sonoma asserts that the advice letter contains material omissions because it fails to

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<sup>24</sup> TURN protest, Page 4

address how PG&E will ensure customers of opt-out community choice aggregations (CCA) are not enrolled in ELRP and are not confused by enrollment efforts. Second, Sonoma says the advice letter violates the CPUC's Cost Causation and Competitive Neutrality principle for demand response programs established by the CPUC in D.14-12-024 and D.17-10-017. This principle, according to Sonoma, prohibits IOUs from imposing the cost of a demand response program on CCA customers who are not eligible for the program in question.<sup>25</sup>

In its response, PG&E addresses the first issue by explaining how it has programmed its billing system to preclude opt-out CCA customers from auto-enrollment, or from enrolling into ELRP during the program year. Regarding the second issue on Cost Causation and Competitive Neutrality, PG&E says that as a pilot, the ELRP is not subject to this principle.

ED rejects the first protest argument as D.21-12-015 does not require PG&E's advice letter to detail its process for handling customers of CCAs that opt out of the program. ED rejects the second protest argument as the Competitive Neutrality issue raised by Sonoma is not applicable to pilots.

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<sup>25</sup> Sonoma Clean Power Authority protest, Page 3

February 4, 2022

**Advice 6496-E**  
(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

**Subject: Pacific Gas and Electric Company's Tier 2 Advice Letter for the Emergency Load Reduction Program Residential Pilot A.6 Pursuant to Decision 21-12-015 and 21-12-069**

### **Purpose**

In compliance with Ordering Paragraph (OP) 38 and Attachment 2 of Decision (D.) 21-12-015 (the "Decision"), Pacific Gas and Electric Company (PG&E) hereby submits this advice letter for approval to establish the parameters and proposed cost of its Emergency Load Reduction Program (ELRP) Residential pilot program.<sup>1</sup>

### **Background**

The new sub-group "A.6" participation option will extend the ELRP to bundled and unbundled residential customers who will have an opportunity to be compensated for their contribution to system reliability and load reduction during times of grid stress.<sup>2</sup> OP 38 of D.21-12-015 requires PG&E, Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (together, the "Investor Owned Utilities" (IOUs)) to collaborate to establish common program parameters, the start time of the dispatch, and marketing strategies to limit customer confusion, and to ensure that each IOUs' messaging is consistent with the statewide Flex Alert campaign and statewide unified branding.<sup>3</sup> On December 27, 2021, the Commission issued D.21-12-069 correcting inadvertent typographical and clerical errors in D.21-12-015.

### **Discussion**

Pursuant to OP 38 and Attachment 2 of the Decision, PG&E has been collaborating with SCE, SDG&E, and the California Independent System Operator (CAISO) to establish

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<sup>1</sup> D.21-12-069, OP 3 clarified the filing date to be "within 60 days of issuance" of D.21-12-015. Because D.21-12-015 was issued on December 6, 2021, the due date is by February 4, 2022.

<sup>2</sup> D.21-12-015, page 46.

<sup>3</sup> D.21-12-015, OP 38 page 172.

common program parameters, including a minimum dispatch window and the start time of the dispatch, that aligns with grid need. The IOUs are developing the ELRP Residential pilot program parameters that aim to “reduce load at the net-peak hours during stressed grid conditions, thus lowering the likelihood of an extreme weather-related blackout.”<sup>4</sup> Based upon conversations with the CAISO and between the IOUs, the following program parameters have been considered:

<b>Program Availability</b>	May through October 7 days a week
<b>Maximum Number of Dispatch Hours Per Season</b>	Up to 60 hours annually
<b>Program Trigger(s)</b>	Triggered day-ahead 1) CAISO Flex Alert or 2) CAISO Alert or EEA Watch Notice <sup>5</sup>
<b>Dispatch Window</b>	4:00 pm – 9:00 pm
<b>Start Time of Dispatch</b>	4:00 pm
<b>Baseline Methodology</b>	5-in-10 with Same Day Adjustment <sup>6</sup> (SDA)
<b>Dispatch Channels</b>	1) Flex Alert 2) Emails (when available), 3) Text Messages (when selected by customer) 4) Mobile Application

Pursuant to OP 34 and Attachment 2 of the Decision, PG&E will auto-enroll customers who receive Home Energy Reports (HER) and those who are in CARE and FERA<sup>7</sup>.

<b>Approximate Potential Auto Enrollment Population</b>	<b>Count</b>
CARE	1,298,327
FERA	39,788
HER	1,636,642
Total	2,974,757
Total Unique Customers <sup>8</sup>	1,781,303

<sup>4</sup> D.21-12-015, Finding of Fact paragraph 66, page 143.

<sup>5</sup> When the CAISO completes the transition from the current AWE process to the North American Electric Reliability Corporation (NERC) Energy Emergency Alert (EEA) standards, then the AWE declarations shall be replaced with the equivalent NERC EEA level notice.

<sup>6</sup> The SDA shall not be less than 0.60 or greater than 1.40.

<sup>7</sup> Attachment 2, page 8.

<sup>8</sup> Customer segment data current as of 3/18/22. “Unique” represents the elimination of overlap of customers who fall in more than one category. Values will change on a daily basis due to customers joining and leaving populations and may be subject to change based on CCA opt-outs and ineligible DR programs.

Customer counts represented in the table include total potential auto enrolled populations in the CARE, FERA and HER categories. The “Total Unique Customers” value removes overlap of customers who fall in more than one category.

PG&E provides Home Energy Reports to explain customer energy usage and provide customized tips and ideas to help customers maximize their energy savings. The Home Energy Reports show customers how much energy is used month to month in comparison to similar homes, and some reports may also show energy data seasonally, by fuel type and broken down by heating and cooling.

For 2022, Marin Clean Energy and Sonoma Clean Power have opted-out.

Customers who are not auto enrolled can opt into the program through a sign-up tool and the enrollment process will determine if they are eligible.

PG&E, upon processing a request from a customer to disenroll from ELRP, will make a best effort to complete the disenrollment within five calendar days. Similarly, upon notification of successful enrollment of a customer in an IOU, CCA or third-party supply-side DR program, PG&E will make a best effort to disenroll that customer from ELRP within five calendar days.<sup>9</sup>

### ***ELRP Residential Pilot Program Marketing Coordination***

The IOUs continue to collaborate on ELRP Residential Pilot Program Marketing in an effort to minimize customer confusion and ensure consistent messaging. The IOUs have also been working with Energy Division Staff and the Flex Alert marketing vendor, DDB San Francisco, on aligning messaging and the development of a program name that will be used in the statewide unified branding and marketing of the program. “Power Saver Rewards” has been selected for the customer-facing statewide name for all websites, outreach materials and program communications.

### ***PG&E ELRP Residential Pilot Program Costs***

Table 1 below includes the balancing account caps included in OP 21.<sup>10</sup> PG&E projects that we can successfully implement the ELRP program within these approved balancing account caps and we request no changes to the approved budget at this time.

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<sup>9</sup> D.21-12-015, page 58, last paragraph.

<sup>10</sup> D.21-12-015 OP 21, page 166.

<b>Table I</b>				
<b>PG&amp;E ELRP Residential Pilot Program Estimated Costs</b>				
<i>(in millions)</i>				
<b>Line No.</b>	<b>Cost Type</b>	<b>2022</b>	<b>2023</b>	<b>Total</b>
1	Program Administration	\$ 9.4	\$ 8.7	\$ 18.1
2	Marketing, Education & Outreach	\$ 2.5	\$ 2.0	\$ 4.5
3	<b>Total Estimated Costs</b>	<b>\$ 11.9</b>	<b>\$ 10.7</b>	<b>\$ 22.6</b>

### **Tier Designation**

Pursuant to OP 38 and Attachment 2 of D.21-12-015, this advice letter is submitted with a Tier 2 designation.

### **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 via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name 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).





# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6496-E

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company's Tier 2 Advice Letter for the Emergency Load Reduction Program Residential Pilot A.6 Pursuant to Decision 21-12-015 and 21-12-069

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.21-12-015 and D.21-12-069

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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

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

Resolution required?  Yes  No

Requested effective date: 3/6/22

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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: (415)973-2093  
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

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

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

East Bay Community Energy Ellison  
Schneider & Harris LLP Energy  
Management Service  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie  
Green Power Institute  
Hanna & Morton  
ICF  
International Power Technology

Intertie

Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Semptra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy