

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



**Pacific Gas & Electric Company  
ELC (Corp ID 39)  
Status of Advice Letter 6520E  
As of May 10, 2022**

Subject: Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company's Integrated Demand-Side Management Program Guidance, Pursuant to Decision 21-12-015

Division Assigned: Energy

Date Filed: 03-07-2022

Date to Calendar: 03-09-2022

Authorizing Documents: D2112015

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>04-06-2022</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**

March 7, 2022

**Advice 6520-E**

(Pacific Gas and Electric Company – U 39 E)

**Advice 4742-E**

(Southern California Edison Company – U 338-E)

**Advice 3963-E**

(San Diego Gas and Electric Company – U902-E)

Public Utilities Commission of the State of California

**Subject: Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company's Integrated Demand-Side Management Program Guidance, Pursuant to Decision 21-12-015**

**Purpose**

In compliance with Ordering Paragraph (OP) 49 of Decision (D.) 21-12-015,<sup>1</sup> Pacific Gas and Electric Company (PG&E) hereby submits this advice letter in coordination with Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E) (together, the "Investor Owned Utilities" (IOUs)) to provide the Commission an update on budgetary and implementation details related to the Integrated Demand-Side Management (IDSM) Program.

**Background**

The California Energy Efficiency Strategic Plan<sup>2</sup> ("Strategic Plan") recognized the integration of demand-side management (DSM) options, including energy efficiency (EE), demand response (DR), clean energy transportation (CET), and distributed generation (DG), as fundamental to achieving California's strategic energy goals. An IOU and Energy Division Statewide IDSM Task Force was formed in 2010 and has continued

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<sup>1</sup> Any relevant modifications pertaining to updates made by D.21-12-069 were considered in preparing this filing.

<sup>2</sup> Strategic Plan available here:

<https://www.cpuc.ca.gov/General.aspx?id=4125#:~:text=On%20Sept.,to%20include%20a%20ighting%20chapter.>

coordinating statewide activities consistent with the Strategic Plan as well as supporting integration directions from D. 09-09-074.<sup>3</sup> The Commission repurposed IDSM funds as part of D.18-05-041 to focus on the limited integration of EE-DR by providing requirements and general policy principles for Program Administrators to follow.<sup>4</sup>

More recently, in response to the Governor’s Emergency Proclamation, on August 2, 2021, the assigned Administrative Law Judge (ALJ) sent a ruling to parties in R.20-11-003 setting forth a proposed scope and schedule for Phase 2. The Commission subsequently issued D.21-12-015, Summer Reliability OIR Phase 2 decision, directing the IOUs to take additional actions to prepare for potential extreme weather in the Summer of 2022 and 2023.

D.21-12-015 provides additional guidance on the role of Program Administrators and third-parties—as specified in D. 18-05-041—on the implementation of IDSM programs by clarifying that the “IOUs may conduct the foregoing integration activity themselves, without recourse to a third-party administrator.”<sup>5</sup>

### **Discussion**

The following table summarizes each IOUs remaining IDSM budget to date, which is comprised of the 2018-2021 period.<sup>6</sup>

<b>IOU</b>	<b>2018-2021 Total Budget Remaining</b>
PG&E	\$26,156,823
SCE	\$33,842,493
SDG&E	\$10,307,093

The IDSM budget allocations will continue to be split between the IOUs at 40% for PG&E, 40% for SCE, and 20% for SDG&E. The following sections detail each IOUs plans for their continued implementation of the IDSM program in compliance with D.18-05-041.

<sup>3</sup> D.09-09-047 available here:

<https://www.docs.cpuc.ca.gov/PublishedDocs/PUBLISHED/GRAPHICS/107829.PDF>

<sup>4</sup> D18-05-041 DECISION ADDRESSING ENERGY EFFICIENCY BUSINESS PLANS available at: <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M215/K706/215706139.PDF> (page 36-38)

<sup>5</sup> D. 21-12-015 p.84

<sup>6</sup> The EE Business Plan submitted by each IOU covers the period 2018-2025.

**Pacific Gas & Electric**

To date, PG&E has approximately \$26,156,823 of remaining IDSM budget.

In 2020, the EE and DR teams developed a bonus smart thermostat rebate (in addition to the existing \$50 EE rebate) for customers who move onto the daily time-of-use rate. This new rebate offered customers an additional \$70 off qualifying smart thermostats, for a total incentive of up to \$120. In addition to leveraging our integrated demand side management (IDSM) budget to fund this incentive, the program also integrated time-of-use rate adoption into the application process, eliminating the need for customers to do this manually through a separate rate change. This enhanced rebate allows us to better serve our customers, and to help them manage energy use increases they may be experiencing during shelter in place. This bonus IDSM incentive is expected to last until second quarter of 2022.

In 2021, PG&E engaged Energy Solutions to partner on the IDSM Services Platform which seeks to provide consulting services to existing, non-residential, local EE third-party programs to create customized IDSM program marketing, best practices and processes which promote participation in demand response by creating compelling IDSM value propositions. Core objectives for the IDSM Services Platform are to:

- Identify EE programs in PG&E's Portfolio with high IDSM potential.
- Create compelling IDSM value propositions for EE program implementers and their customers.
- Design and launch four IDSM Programs over two years.
- Incentivize and support EE program implementers to incorporate IDSM marketing and value propositions, program policies and processes, and training for sales and technical services teams.
- Provide implementation support to EE program implementers as needed.

An IDSM Knowledge Center website will be set up as a repository for the lessons learned and best practices for implementing the IDSM value propositions which may serve as a resource for future EE program implementers. The implementation of the IDSM Services Platform is expected to conclude in the third quarter of 2023. In addition, PG&E will explore IDSM programs/pilots that will assist with at least one of the following opportunities: (a) summer reliability capacity shortfalls and any other outages (e.g., Public Safety Power Shutoff), (b) integrated (technology) solutions with the intent of helping residential customers with time-of-use or real-time pricing, or (c) assisting with reduction or elimination of greenhouse gases.

PG&E will continue to work with other IOUs to support IDSM projects that meet the IDSM program requirements.

**San Diego Gas & Electric**

To date, SDG&E has approximately \$10,307,093 of remaining IDSM Budget.

In 2020, SDG&E leveraged the integrated demand side management budget to fund authorized outreach and education appointment, behavioral interventions, smart thermostat incentives, audits (identifying both energy efficient and demand response opportunities), HVAC controls, lighting controls, and battery storage.

In 2021, SDG&E allocated a portion of its budget attributed to the Behavioral Residential program, adding Behavioral DR to its offering in 2021 for residential customers. SDG&E continues to fund the energy efficiency and demand response programs and continues to introduce customers to both energy efficiency and demand response opportunities. SDG&E also completed non-residential projects that focused on HVAC and lighting controls as well as battery storage. SDG&E also engaged its Third-Party Implemented programs to integrate IDSM and EE + DR into their programs. These current programs are incorporating outreach and education efforts along with smart technologies to help incorporate IDSM into their particular markets.

As new Third-Party Implemented programs come on board, SDG&E anticipates that the request for these dollars will continue to increase. Remaining funds will be made available to Third-Party Implementers as more programs are launched and market focused EE + DR activities ramp up. SDG&E is committed to ensuring market sectors have a robust IDSM and EE + DR activities available.

SDG&E will continue to work with other IOUs to support IDSM projects that meet the IDSM program requirements.

**Southern California Edison**

To date, SCE has approximately \$33,842,493 of the remaining unspent IDSM (EE/DR) Budget.

SCE updated the Residential Direct Install Program Implementation Plan to include the EE/DR integration effort described below.

In 2020 and 2021, In accordance with D.18-05-041, SCE developed and implemented a process through the Residential Direct Install (DI) program to enroll customers that receive a Smart Thermostat onto the Demand Response Smart Energy Program (SEP). This effort consisted of four main steps:

- Pre-Screening: DI Implementer identifies potential eligible customers by asking a series of questions when scheduling installation appointments.

- Customer Consent: During the installation appointment, the Res DI Implementer provides an overview of the Smart Energy Program and obtains customer consent to enroll.
- Field Enrollment: Res DI implementer assists the customer with registering the thermostat online via the customer's mobile device.
- Processing Data: The Res DI Implementer gathers and provides all required information to SCE's demand response provider to complete enrollment.

SCE has enrolled around 4,500 customers in the SEP through this effort and plans to continue to use the IDSM budget for future years of the program. Per D.18-05-041, SCE has budgeted \$1M per year for residential activities but may leverage funding from the nonresidential IDSM budget to increase residential activity that delivers demand reduction through demand response program enrollment.

In 2021, SCE engaged third-party program implementers by requesting a preliminary budget forecast for IDSM and EE/DR activities. This preliminary budget forecast information was used for informational purposes only and to assist SCE in understanding future budget obligations. SCE anticipates a significant portion of the EE/DR funds will be allocated to third parties for EE/DR activities that meet the requirements and general policy principles described in D.18-05-041. Accordingly, SCE may provide EE/DR funds to third-party implementors for recently launched third-party programs, programs that are currently in the solicitation phase, and Statewide programs that may request EE/DR funding.

SCE will continue to work with other IOUs to support IDSM projects that meet the IDSM program requirements.

### **Attachments**

The attachments to this filing are as follows:

1. Attachment A: IOU IDSM Workpaper

### **Tier Designation**

Pursuant to OP 49 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 **March 28, 2022**, which is 21<sup>7</sup> 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 the Joint IOUs 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 SCE:

Shinjini C. Menon  
Managing Director, State Regulatory Operations  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Tara S. Kaushik  
Managing Director, Regulatory Relations  
c/o Karyn Gansecki  
E-mail: Karyn.Gansecki@sce.com

For SDG&E:

Attn: Greg Anderson  
Regulatory Tariff Manager  
E-mail: GAnderson@sdge.com  
and SDGETariffs@sdge.com

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<sup>7</sup> The 20-day protest period concludes on a weekend; therefore, PG&E is moving this date to the following business day.





# 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) #: 6520-E et el

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company's Integrated Demand-Side Management Program Guidance, Pursuant to Decision 21-12-015

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

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: N/A

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: N/A

Resolution required?  Yes  No

Requested effective date: 4/6/22

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

# **Attachment A**

**IOU IDSM Workpaper**

		2018	2019	2020	2021	2018-2021 Total Budget Remaining
PG&E	Residential Authorized Annual Budget	n/a	\$ 1,000,000.00	\$ 1,000,000.00	\$ 1,000,000.00	
	Non-Residential Authorized Annual Budget	n/a	\$ 8,000,000.00	\$ 8,001,000.00	\$ 8,000,000.00	
	Total Authorized Annual Budget [1]	\$547,921	\$ 9,000,000.00	\$ 9,001,000.00	\$ 9,000,000.00	
	Total Annual Spent [2]	\$ -	\$ -	\$ 229,000.00	\$ 1,163,098.00	
	Annual Budget Remaining	\$ 547,921.00	\$ 9,000,000.00	\$ 8,772,000.00	\$ 7,836,902.00	\$ 26,156,823.00
SDG&E	Residential Authorized Annual Budget	\$ 1,577,863.00	\$ 6,732,328.00	\$ 7,476,352.00	\$ 6,982,254.00	
	Non-Residential Authorized Annual Budget	\$ 2,926,471.00	\$ 5,516,130.00	\$ 5,713,613.00	\$ 4,593,843.00	
	Total Authorized Annual Budget [3]	\$ 4,504,334.00	\$ 12,248,458.00	\$ 13,189,965.00	\$ 11,576,097.00	
	Total Annual Spent	\$ 3,072,254.00	\$ 9,032,333.00	\$ 9,755,442.00	\$ 9,351,732.00	
	Annual Budget Remaining	\$ 1,432,080.00	\$ 3,216,125.00	\$ 3,434,523.00	\$ 2,224,365.00	\$ 10,307,093.00
SCE	Residential Authorized Annual Budget	\$1,000,000.00	\$1,000,000.00	\$1,000,000.00	\$1,000,000.00	
	Non-Residential Authorized Annual Budget	\$7,780,000.00	\$8,360,000.00	\$8,871,000.00	\$8,678,000.00	
	Total Authorized Annual Budget [4]	\$8,780,000.00	\$9,360,000.00	\$9,871,000.00	\$9,678,000.00	
	Total Annual Spent	\$1,125,747.38	\$1,064,871.32	\$700,980.30	\$954,907.63	
	Annual Budget Remaining	\$7,654,252.62	\$8,295,128.68	\$9,170,019.70	\$8,723,092.37	\$ 33,842,493.37

[1] 2018: Authorized budget for program ID PGE21081 in PG&E's 2018 Annual Report, Attachment Table 3.

D.18-05-041, OP 12 rejects PG&E's 2018 annual budget advice letter and adopts its 2018 business plan funding amount. Requirements for IDSM funding in D.18-05-041, OP 10 were not applied to 2018 retroactively, so PG&E provides the closest possible analogue of funding for its Statewide DSM Coordination and Integration program.

2019: AL 4011-G/5375-E, 2020: AL 4136-G-A/5627-E-A, 2021: AL 4303-G-A/5936-E-A

[2] For PG&E, this figure does not include IDSM spending within Energy Efficiency programs since the EE programs historically did not track IDSM costs separately

[3] 2018: AL 3111-E-A/2607-G-A, 2019: AL 3267-E/2700-G, 2020: AL 3429-E-A/2797-G-A, 2021: AL 3599-E/2897-G

[4] 2018: AL 3654-E, 2019: AL 3859-E, 2020: AL 4068-E, 2021: AL 4285-E

**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.  
Braun Blasing Smith Wynne, P.C.  
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  
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  
McClintock IP  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

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

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