

July 14, 2022

Advice Letter 6606-E-A
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: Implementation Details for Empower EV Pilot
Program**

This supplemental supersedes Advice Letter 6606-E in its entirety. The purpose of this supplement to Advice Letter 6606-E is to edit the Empower EV Pilot program's eligible electric vehicle supply equipment (EVSE) to only offer Level 2 networked chargers. This change applies to all Eligible Customers.

Purpose

Pursuant to Ordering Paragraph 2 of Decision (D.) 19-09-006, Pacific Gas and Electric Company (PG&E) hereby submits its proposal to address the following Empower EV pilot program implementation details:

- (1) The income verification process, including a comparison of the process to other electric vehicle programs;
- (2) The guidelines for participation by tenants of rental properties for the Empower program;
- (3) The program evaluation process, including a data collection plan and a preliminary format of the final program report;
- (4) How the program will offer each participating customer assistance in determining the optimal rate for their home load profile; and,
- (5) How the data collection metrics, adopted in Ordering Paragraph 10, may be reported separately for a California Air Resources Board's Community Air Protection Program community, if such a community is selected.

Background

Empower EV was approved for implementation by the California Public Utilities Commission (CPUC) in September 2019 in D.19-09-0061. Empower EV focuses on supporting EV adoption with low-to-moderate income eligible customers by reducing three key barriers:

- Total cost of ownership;
- Lack of knowledge about EVs and their benefits; and
- Access to charging infrastructure

Empower EV benefits include providing Eligible Customers up to \$2,000 for electric panel upgrades, completed by licensed electricians, and point-of-sale Level 2 networked charger cost coverage at no more than \$500 per unit.

Income Verification Process

On May 5, 2021, GRID Alternatives (GRID) was selected as the third-party implementer for Empower EV. GRID will utilize the California Air Resources Board's (CARB) Access Clean California income verification process, detailed below, to ensure compliance with Empower EV's eligibility criterion that customers have incomes at or below 400% of the Federal Poverty Level (FPL), and to reduce application barriers to the maximum extent possible, including through categorical eligibility determinations. GRID will collect and assess the following documents to verify income for Empower EV:

- Applicants must submit a signed affidavit attesting to their household income AND must provide one of the following:
 - Applicants who file taxes will have their income confirmed by the tax transcript via IRS Form 4506-C, the Income Verification Express Service (IVES) Request for Transcript of Tax Return;
 - Applicants who do not file taxes must verify their income with either the most recent available IRS Form W-2, Wage and Tax Statement; or pay stubs or bank statements; or,
 - Categorical eligibility: Applicants who have provided validated income verification documentation for another program within the past 6 months showing income levels at or below 400% FPL are automatically deemed eligible. If income verification documentation is older than 6 months, the applicant must provide updated documentation per the guidelines above. Otherwise applicants may provide additional categorical eligibility as provided

1 Decision (D.) 19-09-006: DECISION APPROVING THE APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR THE EMPOWER ELECTRIC VEHICLE CHARGER INCENTIVE AND EDUCATION PROGRAM, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M314/K145/314145047.PDF>

on Page 2 of Required Income Document Guide² for the California Alternative Rates for Energy (CARE) Program.

Some of the specific details regarding how household size and income are calculated, and proven via processes described above, may change over time as CARB (and/or other agencies) update their policies and create an aligned income verification standard. The desired outcome is to ensure applicants do not have to follow different processes across these programs, so any updates will be in the spirit of standardization and coordination with CARB's Access Clean California income verification process. Any such changes will be documented so that Applicants are aware of the most up-to-date process.

Guidelines for Renters

PG&E will use the following guidelines for participation by tenants of rental properties in the Empower EV program.

Renter Pathway 1: Applicants who are renters will be required to get formal, written pre-approval from the property owner to install a networked Level 2 charger. GRID will work with PG&E to create a pre-approval template document for renters to use with property owners.

Renter Pathway 2: For low-income renters who physically can't install a Level 2 networked charger or whose landlord has not provided permission, GRID will offer an alternative charging package that includes a portable Level 2 networked charger for those tenants who have access to a 240v outlet. This charger will remain with the tenant in the event they move to another residence.

Program Evaluation Process

Salesforce Customer Relationship Management (CRM)

GRID Alternatives plans to build on its existing Salesforce CRM infrastructure in coordination with its Operations and Clean Mobility teams (including the Access Clean California program) to collect applicant and project data. The Access Clean California CRM environment (also known as an "instance") will be used to accept and process applications while GRID's project instance will be used to manage subcontractors and track installations. GRID will work with its Operations team, Clean Mobility team, and Salesforce developer to ensure proper communication between the platforms for efficiency and a cohesive project flow.

GRID will ensure that CRM fields are sufficient to develop reports for required reporting to PG&E. The data fields and reports will follow the requirements PG&E has set out for

² https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/EN_income_guide.pdf

monthly and quarterly reporting. The fields shall include, or be functionally equivalent to, but not limited to:

- Customer name
- Project address (must match PG&E account address)
- EV make, model, year, purchased or leased, new or pre-owned
- EV Purchase Date
- Home owned or rented
- Race/Ethnicity (optional)
- Age (optional)
- Gender (optional)
- Nationality (optional)
- Languages Spoken (optional)
- Lead Source (optional)
- Household size
- Total Annual Income
- Income Verified Method
- Application Submission Date
- Application Approval Date
- Client survey fields as needed
- Sub-contractor
- Panel upgrade cost
- Charger distribution date
- Application Submittal to Express Connections/Service Planning Date
- Service Planning Response Date
- Project Completion Date
- Customer PG&E Account Number

Monthly and Quarterly Reporting

GRID will develop monthly and quarterly reporting templates to be agreed upon by PG&E in advance of the first report.

Scope of monthly reporting: GRID Alternatives will provide monthly reporting including:

- Monthly budget spend
- Total number of customers served
- Number of renters versus homeowners broken down by charger type
- Demographic information of participants (age, race/ethnicity, gender, nationality, language). Note: Demographic information will be provided at the discretion of the applicant.
- How customers learned about Empower EV
- At what point customers decided to enroll (before/after EV purchase)

- Vehicle purchase date
- Total amount of charger incentives issued
- Total amount of panel upgrade incentives issued
- Total number of chargers distributed
- Average total cost for panel upgrades
- Average total cost for chargers
- Type of electrical work performed at each household (panel upgrade amperage, circuitry, etc.)
- Charger utilization, and data-aggregated customer load curves, for 12 months prior to charger distribution and 12 months post charger distribution, pending charger model, connectivity, and EVSE supplier data sharing
- Programmatic challenges and solutions, when applicable
- Why customers dropped from program participation, if known
- Additional information and metrics, to be mutually agreed upon by GRID and PG&E

Scope of quarterly reporting. GRID Alternatives will provide quarterly reporting including:

- Customer feedback received via email, phone, or through case managers
- Rate choice
- CBO participation and customer feedback
- Map of charger locations with census tract information
- Outreach and/or translation services
- Customer participation in other CARB/ EV incentive programs
- Additional information and metrics, to be mutually agreed upon by GRID and PG&E

Final Evaluation Report

GRID will work in collaboration with PG&E to provide a final program evaluation report to be shared online and with other California investor- owned utilities for educational purposes. The preliminary format for the report is as follows:

- Executive Summary with key program metrics and top learnings
- Overview of program structure, goals, and implementation work
- Quantitative breakdown and analysis of core program metrics, including:
 - Geographical distribution of program funding
 - Distribution of utility rate schedule selection among participants
 - Selection of EV charging equipment, both in general and across participant types
 - Estimated charger utilization data and hourly load profiles to be assessed in coordination with PG&E
 - Overall customer satisfaction data
 - Data on vehicle distribution: make/model/year, new vs. used, purchased vs. leased
 - Data on incentive stacking with CARB's EV incentive programs

- Qualitative Analysis of Implementation Strategy
 - Programmatic and operational challenges that were encountered and analysis of strategies used to address these challenges
 - Review of each CBO's involvement in the program, including customer feedback
 - Analysis of outreach strategies used to address and overcome barriers to equitable participation, such as linguistic barriers
- Key takeaways and learnings from quantitative and qualitative analysis to inform future efforts.

Rate Guidance

Both PG&E and GRID Alternatives will advise Applicants to use PG&E's EV Savings Calculator³ to determine what rate will best fit their anticipated charging habits and choice of electric vehicle. PG&E's EV Savings Calculator is easy to use, accessible for all internet-based applicants, gives results quickly, and provides insights into optimal rates and EV incentive eligibility. Rate selection will be tracked at both the beginning and the end of the program to determine which rate a customer is on and whether it has changed during their participation in the program.

Community Air Protection Program Reporting

Empower EV is open to all income qualified customers throughout PG&E's service area. Since there is no geographic limitation for program reporting, including for CARB's Community Air Protection Program (CAPP) communities, PG&E will not report its data collection metrics separately for these communities. PG&E's metrics will instead highlight significant program findings from throughout the service area, both in monthly data reports and in the final evaluation. After further discussions, PG&E determined it will report out on the distribution of incentives per county, but not by CAPP communities, because of the following items: Empower EV's offerings are not exclusive to those living within CAPP communities and the data collection methods, as presented in this Advice Letter, are not readily mapped to CAPP community boundaries; no CAPP community has specifically been selected for participation in the Empower EV program and Empower EV does not hold to CAPP's geographic limitation for participation; and Empower EV has been designed to serve roughly 2,000 households in PG&E's service area and the pollution sources identified within the seven CAPP communities are highly unlikely to be significantly impacted by CAPP member participation in Empower EV.

Protests

Pursuant to GO 96-B, General Rule 7.51., PG&E request to maintain the original protest and comment period designated in Advice Letter 6606-E and not reopen the protest period.

³ Available at <https://ev.pge.com/>.



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

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

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho
 Phone #: (415) 973-8794
 E-mail: PGETariffs@pge.com
 E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6606-E-A

Tier Designation: 2

Subject of AL: Supplemental: Implementation Details for Empower EV Pilot Program

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.19-09-006

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: 6282-E

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: 6/25/22

No. of tariff sheets: N/A

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

Protests and 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: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
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.
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
Stoel Rives LLP

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