

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 4643G/6679E**  
**As of September 7, 2022**

Subject: Joint Submittal Community-Based Organization Arrears Case Management Pilot Proposal  
in Compliance with D.22-04-037

Division Assigned: Energy

Date Filed: 08-16-2022

Date to Calendar: 08-24-2022

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<b>Disposition:</b>	<b>Withdrawn</b>
<b>Effective Date:</b>	<b>None</b>

Resolution Required: Yes

Resolution Number: None

Commission Meeting Date: None

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**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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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.)

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

August 16, 2022

**Advice 4643-G/6679-E**

(Pacific Gas and Electric Company U 39 M)

**Advice 4051-E/3111-G**

(San Diego Gas & Electric Company - U 902-M)

**Advice 6019-G**

(Southern California Gas Company - U 904 G)

**Advice 4846-E**

(Southern California Edison – U 338-E)

Public Utilities Commission of the State of California

**Subject: Joint Submittal Community-Based Organization Arrears Case Management Pilot Proposal in Compliance with D.22-04-037**

**Purpose**

In accordance with Ordering Paragraph (OP) 5 of Decision (D.) 22-04-037, Pacific Gas and Electric Company (PG&E), on behalf of the Community Based Organization Arrears Case Management Pilot Working Group (CBO Pilot Working Group) and in coordination with San Diego Gas & Electric Company (SDG&E), Southern California Gas Company (SoCalGas), and Southern California Edison Company (SCE), submits this Tier 3 advice letter (AL) proposing a Community-Based Organization Arrears Case Management Pilot (CBO Pilot).

**Background**

On April 18, 2022, the California Public Utilities Commission (CPUC or Commission) issued D.22-04-037 (*Decision Requiring Development of Community Based Organization Case Management Pilot Program to Reduce Arrearages Associated with the COVID-19 Pandemic*), which provided a framework to establish and operate a CBO Case Management Pilot Program.<sup>1</sup> The “CBO Pilot is intended to serve customers who would otherwise continue to face difficulty in resolving their utility bill debt once the statewide relief distributed to utilities [from the California Arrearage Payment Program] is applied to

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<sup>1</sup> D.22-04-037 at 2.

customer accounts.”<sup>2</sup> The Commission explained that a case management pilot is needed because it is currently missing from the investor-owned utility (IOU) partnerships with CBOs stating, “[t]he cost for case management is relatively high, and the need to nurture and build CBO capacity takes time.”<sup>3</sup>

D.22-04-037 established a CBO Pilot Working Group co-led by PG&E and a CBO, and tasks the CBO Pilot Working Group with finalizing a proposal for the pilot budget, contract administration plan, payment structure, targeted communities, and evaluation plan.<sup>4</sup> D.22-04-037, issued on April 18, 2022, directs PG&E, on behalf of the CBO Pilot Working Group, to submit a proposal for the CBO Pilot in the docket or Rulemaking (R.) 18-05-007 within 120 days of the issuance of the decision.

The structure of this AL aligns with the requirements in D.22-04-037, which requires the CBO Pilot proposal to include the following topics:

- Scope
- Pilot Size, Sample Allocation, and Eligibility
- Pilot Design
- Payment Structure and Contract Administration
- Metrics and Reporting
- Pilot Evaluation
- Budget and Cost Tracking
- Timeline

## **Discussion**

### **A. Working Group Formation**

Pursuant to OP 1 of D.22-04-037, PG&E convened an initial meeting of stakeholders on May 31, 2022, to form the CBO Pilot Working Group. During this meeting, Valley Clean Air Now (Valley CAN) was nominated by CBO members and voted on by all Working Group members to co-lead the Working Group with PG&E. Valley CAN is a 501c3 public charity founded in 2001 that is dedicated to delivering needed assistance to low-income residents of San Joaquin Valley disadvantaged communities. To address the interrelated issues of air quality, community health and access to transportation, Valley CAN developed award-winning programs to give support for families to get to work and school cleanly and affordably. Valley CAN has built a network of hundreds of community organizations throughout the region, from churches to farmworker groups to food distribution efforts, who trust Valley CAN to help connect their members to available

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<sup>2</sup> D.22-04-037 at 2.

<sup>3</sup> *Id* at 4.

<sup>4</sup> *Id* at 4.

benefits while respecting their privacy and shielding them from unwanted exposure to government agencies.

The Working Group met six times between May 31, 2022, and July 5, 2022<sup>5</sup> to develop its proposal for the CBO Pilot based on the parameters outlined in D.22-04-037.<sup>6</sup> All meetings were made public and notified via the Disconnections OIR and Low Income proceedings service lists. Meeting materials were made available to attendees in advance of each meeting to ensure the sessions were productive and advanced the pilot design.

In addition, OP 1 of D.22-04-037 requires the CBO Pilot Working Group to include a diverse group of stakeholders, including the IOUs, Community Choice Aggregators (CCAs), CBOs, tribal communities, advocacy groups, Self-Help Enterprises, and the CPUC.<sup>7</sup> Table 1 below provides an overview of these organizations and their roles in the Working Group.

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<sup>5</sup> The Working Group met on May 31, June 9, June 14, June 21, June 28, and July 5, 2022.

<sup>6</sup> D.22-04-037 at OP 4.

<sup>7</sup> *Id* at OP 1. See also Attachment A to D.22-04-037 for the list of required participants.

**Table 1: CBO Working Group Participants**

<b>Organization</b>	<b>Working Group Role</b>
Valley CAN	Co-Lead
PG&E	Co-Lead
SCE	Member
SoCalGas	Member
SDG&E	Member
Redwood Coast Energy Authority	Member
Clean Power Alliance	Member
San Diego Community Power	Member
Project GO, Inc	Member
Lived Experiences	Member
Self-Help Enterprises	Member
North Fork Rancheria of Mono Indians of California	Member
Association of California Community and Energy Services	Member
CPUC, Cal Advocates	Member
The Utility Reform Network	Member
Center for Accessible Technology	Member
California Department of Community Services and Development <sup>8</sup>	Member
CPUC, Energy Division	Member
CPUC, Executive Division	Member

**B. Pilot Scope**

The CBO Pilot will include graduated levels of support, i.e. multi-tiered case management services to assist customers in managing their arrears inclusive of providing funding options, as described further in the intake process section below (i.e. appropriate grants customers might be eligible for), energy pricing and/or utility bill education and follow-up until their arrearage is eliminated and they can manage current bills going forward. Once a customer is enrolled, pilot program services are anticipated to last for twelve months, with a CBO-customer follow up interaction of approximately once per quarter. The pilot program will offer support to customers as follows:

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<sup>8</sup> Attachment A to D.22-04-037 requires a representative from the Low-Income Oversight Board (LIOB). The LIOB identified the California Department of Community Services and Development (CSD) as its representative.

- In-language support: English, Spanish, and other languages identified as prevalent in the community.
- Enrollment support into the pilot as well as other programs to help manage bills and energy use: phone support, online and text enrollment as CBOs' capabilities allow.
- Local presence support: selected CBOs are expected to have physical proximity to the geographic area or zip codes selected for the pilot to allow for in-person services as necessary.

Additional details on the pilot program design, including details on case management services, are included in Section D below.

### **C. Pilot Size, Sample Allocation, and Eligibility**

The CBO Pilot Working Group proposes for the CBO Arrearage Case Management Pilot size not to exceed 12,000 customers statewide, as expected by D.22-04-037<sup>9</sup>. For the pilot program sample allocation, the CBO Pilot Working Group recommends modifying the standard IOUs' cost-sharing allocation by leading with the electric utility accounts. This approach will result in a reweighting of the cost allocation percentages. For the Central region with SCE and SoCalGas, the CBO Pilot Working Group recommends SoCalGas match its accounts to SCE's sample accounts to facilitate a joint pilot effort for SCE and SoCalGas. The CBO Working Group recommends the following approximate allocation maximum of participating customers per IOU:

- PG&E: 4,800
- SCE & SoCalGas: 4,800
- SDG&E: 2,400

In addition, the CBO Pilot Working Group agrees that customers should meet the following eligibility criteria:

- Customers must be residential customers who reside in a zip code that meets the CPUC's definition of an "affordability area of concern." These communities score the highest on the CPUC's affordability ratio metric for a representative gas or electric utility customer at the 20<sup>th</sup> percentile of household income. Table 2 below lists the CBO Working Group's proposed eligible CBO Pilot zip codes;
- Customers must have arrears that are at least 90 days old and may be at a risk for disconnection (defined as a customer being in active collection and/or severance process); and
- Not be required to meet certain income qualification requirements to receive case management support from a CBO.

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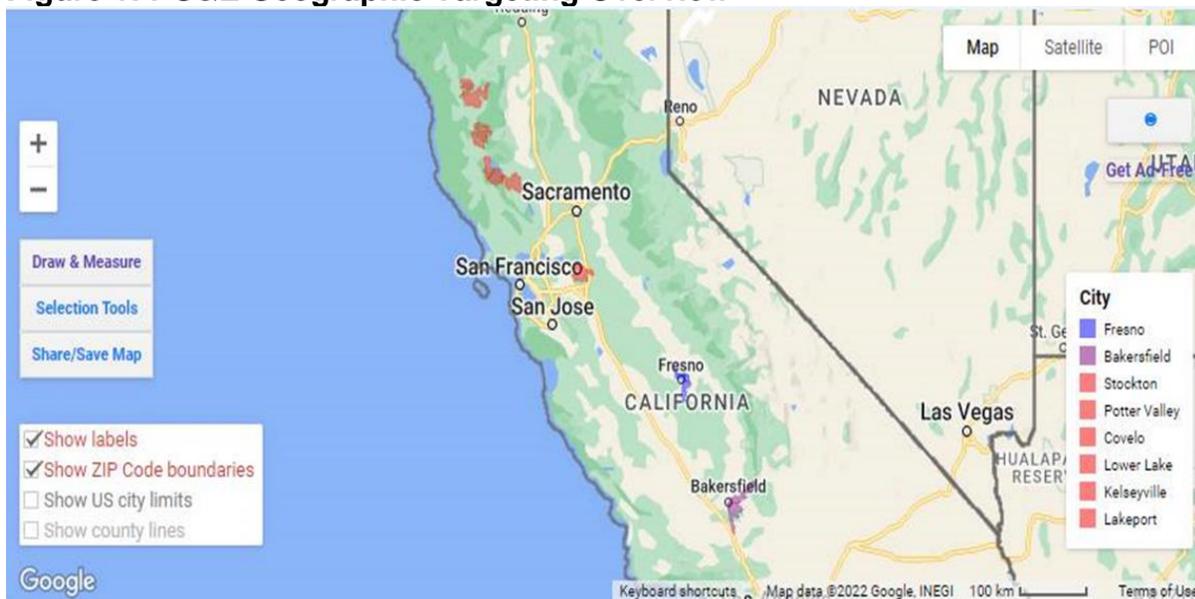
<sup>9</sup> D.22-04-037, p. 2.

**Table 2: Zip Codes Proposed for CBO Pilot Eligibility**

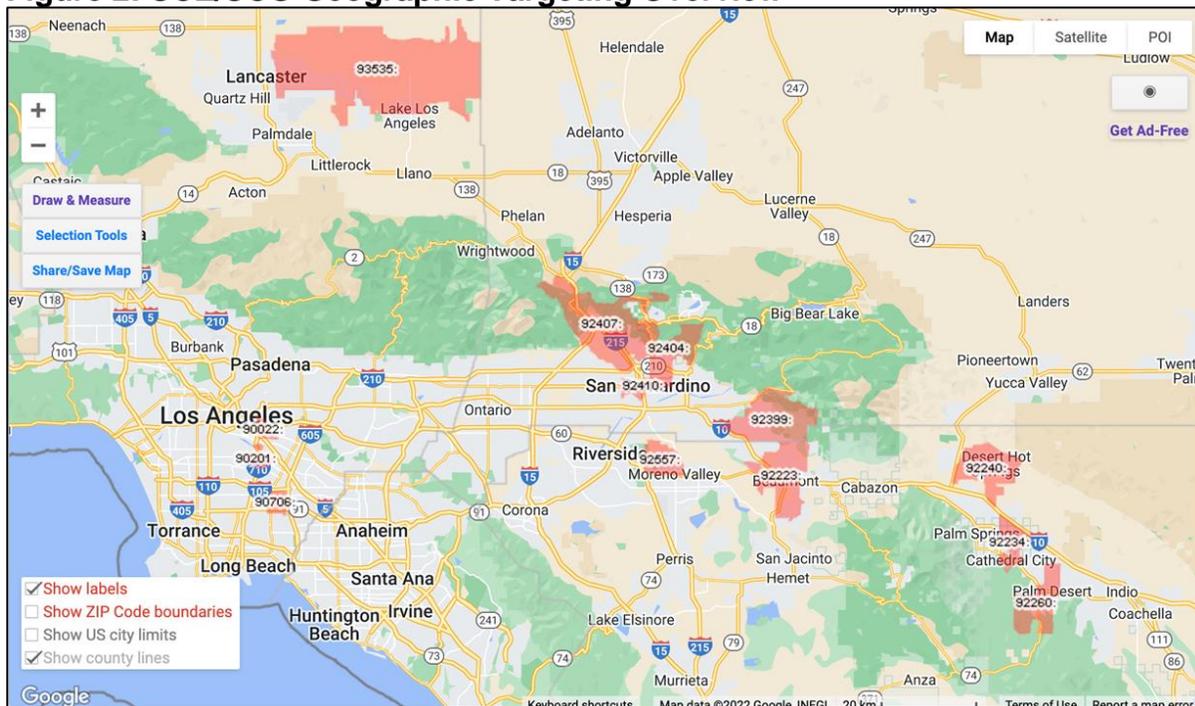
<b>IOU</b>	<b>Zip Code</b>	<b>DAC<sup>10</sup> Designation</b>	<b>City</b>
PG&E	93304	Yes	Bakersfield
	93305	Yes	Bakersfield
	93306	Yes	Bakersfield
	93307	Yes	Bakersfield
	93702	Yes	Fresno
	93703	Yes	Fresno
	93705	Yes	Fresno
	93722	Yes	Fresno
	93725	Yes	Fresno
	93726	Yes	Fresno
	93727	Yes	Fresno
	93728	Yes	Fresno
	95451	No	Kelseyville
	95453*	No	Lakeport
	95457	No	Lower Lake
	95206	Yes	Stockton
SDG&E	92102	No	San Diego
	92104	No	San Diego
	92105	Yes	San Diego
	92115	No	San Diego
	92116	No	San Diego
SCE/SoCalGas	92223*	No	Beaumont
	90706	Yes	Bellflower
	90201	Yes	Bell Gardens
	92234*	No	Cathedral City
	92240	No	Desert Hot Springs
	93535	No	Lancaster
	90022	Yes	Los Angeles
	92557	Yes	Moreno Valley
	92404*	Yes	San Bernardino
	92407	Yes	San Bernardino
	92410	No	San Bernardino
	92260	No	Palm Desert
	93292	No	Visalia
	92399	No	Yucaipa

\* Zip code overlaps with Tribal Lands

**Figure 1: PG&E Geographic Targeting Overview**

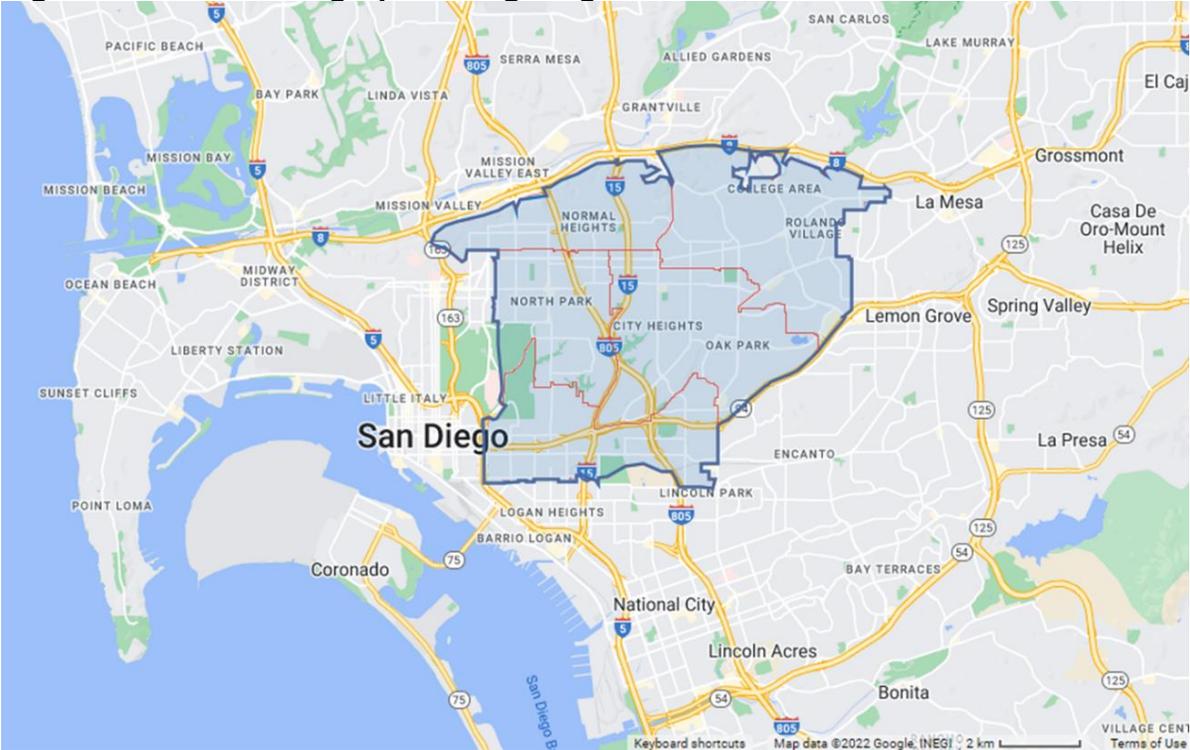


**Figure 2: SCE/SCG Geographic Targeting Overview**



<sup>10</sup> DAC refers to the CalEnviroScreen 4.0 designation as a Disadvantaged Community, available at <https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf>

**Figure 3: SDG&E Geographic Targeting Overview**



#### **D. Pilot Design**

The proposed pilot design will include customer support in managing arrears through CBOs managing the customer outreach and enrollment process, followed by a thorough intake assessment that determines multi-tiered case management services based on customer need.

Within sixty days of a decision being issued, the IOUs will commence a competitive solicitation process to identify interested CBOs who meet the criteria for providing effective case management services, from their list of eligible CBOs in their databases or located within the local proximity of the pilot communities. Successful CBOs will have key capabilities and attributes, including:

- Close geographic proximity to the targeted locations to be able to provide in person support (although CBOs are not required to be physically located within the zip codes of the areas being served)
- Ability to provide in-language support for customers
- Familiarity with IOUs and non-IOU energy programs and services
- Access to a case management tracking system with reporting capabilities
- Successfully completing IOU data privacy and security requirements to ensure compliance with California state laws and regulations as well as CPUC decisions to securely share and receive customer information
- Demonstrating ability to form partnerships with local organizations to efficiently deliver wrap-around services to ensure that the holistic needs that are within the scope of the pilot services, are being supported through a network of locally available resources
- Being able to work effectively with IOUs to form a strong partnership to support problem resolution, effective interactions, and access data in a secure and compliant manner (including confidential customer data and customer data accessible through the Agency Portal)

Additional details about the CBO contracting process are included in Section E, below.

**Initial Intake Process:** Once the successful CBOs are selected and onboarded with training in the customer programs to be included in this pilot provided by the IOUs, the customer intake process will make available the first opportunity for customer evaluation and support. IOUs will provide selected CBOs customer contact information for eligible customers; data sharing will be possible because all selected CBOs will have successfully completed the IOU data sharing requirements to ensure that customer personal information and customer “do not contact” preferences will be protected. During the customer intake process, the CBOs will conduct a deep-dive case analysis to assess the customer’s financial situation and family needs to develop an action plan. Specifically, CBOs will assess customer eligibility and status (i.e. geographic location, account arrearage and at-risk status), identify immediate and long-term needs; initiate billing dispute and resolution actions, develop and discuss an initial action plan for the customer; and have the customer sign a Case Management Agreement demonstrating their consent to participate in the pilot. The Case Management Agreement is the customer’s consent to participate in various aspects of the case management such as:

- Financial support to help resolve past due debt
- Financial and energy education on utility and locally available programs helping to provide short- and long-term stability
- Participation in quarterly status check-ins (based on the level of support needed and stated in the action plan)
- Participating customers must also agree to at least one follow-up session in the twelve months after their debt has been successfully resolved

Once the customer has gone through the initial intake process and signed the Case Management Agreement, they can begin to receive multi-tiered arrearage case management services based on their specific action plan. Services are divided into three tiers to support participating customers throughout the year. It should be noted that not all customers will need the support of all tiers of service. The severity of the debt and the unique customer circumstances will guide the level of support services to be included in their action plan.

- Tier 1 Services provide immediate relief and assistance to remove the risk of disconnection in months 1-3, including:
  - Basic energy education, financial education, training, and best practices (Tier-1 Education)
  - Immediate program relief: IOUs and Non-IOUs Program, including the Low-Income Home Energy Assistance Program (LIHEAP), the Arrearage Management Payment (AMP) plan, the California Alternative Rates for Energy (CARE) program, the Family Electric Rate Assistance (FERA) program, payment arrangement and other locally available program options
  - Negotiation of payment plans, as appropriate

- Refine and continue customer assessment and action plan
- Tier 2 Services continue supporting customer relief in months 4-6 by offering:
  - Tier-2 continued energy and financial education, and best practices
  - Enrollment in additional IOUs and non-IOUs programs to make the customer's home more energy efficient as well as the most beneficial rate plan options
  - Renegotiation of payment plans and disconnection status, as necessary
- Tier 3 Services provide ongoing monitoring and support in months 7-12 through:
  - Evaluation of the customer's progress out of debt
  - Consideration of any changes in circumstances, impacts on the action plan, and necessary revisions
  - Reinforced energy education, sound financial practices, and appropriate energy usage behavior at home
  - Monitoring at an agreed-to frequency based on customer-specific situation

After 12 months from the date of enrollment, each customer will be evaluated to determine if the pilot was successful in eliminating their arrears. For customers whose debts have been successfully resolved, a follow up session will be held at least once in the twelve-month period following the resolution of the debt, with the CBOs reporting on whether the customer remained current in their utility account or based on their case management lessons and financial education, was better able to address any newly acquired debt.

Customers who did not complete their action plan or successfully resolve their debt, will exit from the Case Management Pilot and transfer to normal customer care provided by the IOUs.

### **E. Payment Structure and Contract Administration**

Each IOU will be responsible for their own contract award process and administration utilizing a consistent scope of work for CBO case management services. Once CBOs are selected and ready to launch the pilot, the IOUs will provide marketing and outreach assistance in the first six months to raise awareness and help increase enrollment. In addition, the IOUs will have administrative duties such as contract management, CBO training, onboarding, formal program evaluation and regulatory reporting.

To ensure that CBOs are adequately resourced to support upfront planning and preparation necessary for the CBO pilot, as well as case management services, the following payment structure outlined below will be used by the IOUs.

Upon selection of the CBOs through a competitive solicitation process, CBOs selected for participation will be:

- Paid an upfront grant payment to cover pilot pre-planning and set-up costs, not to exceed 30% of the two-year contract amount. CBOs will be given an opportunity to request upfront payment, in their response to a streamlined competitive solicitation process.
- Thereafter, on a monthly basis, CBOs will receive additional payments for each customer enrolled at the end of the preceding month in the case management pilot (enrolled is defined as a customer with a signed agreement to participate in case management). There will be a monthly case management fee established in the contract between IOU and CBO for each customer enrolled.
- The monthly case management per enrolled customer fee will be calculated as follows: [the total awarded amount of the contract minus upfront payment]/ 12 monthly payments /estimated number of customers to be served (not to exceed contract maximum).

## **F. Metrics and Reporting**

The pilot will have metrics and reporting requirements for both the selected CBOs and the IOUs.

The proposed reporting metrics for CBOs include monthly operational reporting as specified by the IOUs (potentially including program activities, budget, invoice, etc.), and monthly program metrics reporting. The proposed program metrics include the following:

- Number of customers in the sample group
- Number of pilot customers contacted through outreach by each CBO
- Number of signed customer participation agreements
- Number of customers enrolled in each service level tier
- Number of completed case management action plans
- Number of customers who have completed the first six months of the case management program
- Number of customers who have completed the twelve months of the case management program
- Number of customers that unenrolled (or withdrew) from the case management program
- Number of disconnections from pilot program enrolled and unenrolled customers
- Total and average number of programs recommended per customer
- Total and average number of programs enrolled in per customer (based on customer self-report)
- Number of customers enrolled/confirmed enrolled in each program
- Average LIHEAP Cash Relief per customer
- Participating customers' arrearage status:
  - Arrearage at the time of the signed participation agreement compared to subsequent arrearage by each month-end
  - Calculate pilot program aggregate and per account difference:
    - Increased arrearages, by dollar and percentage of accounts
    - Same/reduced arrearages, by dollar and percentage of accounts

The IOUs proposed metrics include monthly and annual metrics to be submitted to the CPUC. Annual metric reporting will take place 18 months after the pilot initiates to allow for a 6 month\* enrollment period and full 12 months of case management services. The proposed metrics and frequency are included below:

**Table 5: Proposed Metrics\***

Metric	Frequency
For pilot program accounts, report using Disconnection OIR (R.18-07-005) Report <b>Section-3 format</b> , <sup>11</sup> <b>by number of accounts, day, and amount owed</b> . First report to be filed the month following the close of the enrollment period – enrollment period lasts 6 months. This locks in the list of pilot participants for consistency of reporting*	Monthly
Number and dollar amount of <b>ALL customers facing arrears 12 months</b> after pilot initiation, per CBO geographic location, exclude pilot accounts	Annual
Number and dollar amount of <b>targeted customers facing arrears 12 months</b> after pilot initiation, per CBO geographic location, exclude pilot accounts	Annual
Number and dollar amount of <b>pilot accounts (i.e., signed participation agreements) facing arrears 12 months</b> after pilot initiation, per CBO geographic location (Pilot accounts only)	Annual
Number and percentage of pilot accounts successfully <b>complete</b> the Case Management Service and eliminate all arrearage, within <b>12 months</b> of case management services	Annual
Number of pilot accounts successfully remain current on energy bills, after 24 months	Annual
Number and dollar amount of pilot accounts that are part of the arrearage again, after 24 months	Annual
Number and percentage of pilot customers who successfully <b>reduced arrearage</b> but did not eliminate all debt, after <b>12 months</b> of case management services	Annual
Number and percentage of pilot customers with <b>no change, withdrew from the pilot or increased arrearage</b> , after <b>12 months</b> of case management services	Annual

\*All reporting details will be finalized during the pre-pilot face post Decision and an advice letter will be filed with the final Working Group’s proposal for reporting templates, timing and frequency.

### **G. Pilot Evaluation**

Pilot evaluation is anticipated to be conducted by an independent third-party, with the following preliminary high-level evaluation scope:

1. Assess if case management is effective in reducing arrearage and level of disconnection, as well as quantify the pilot’s impacts on these objectives.
2. Determine if quantitative and qualitative benefits sufficiently outweigh costs to warrant program expansion.

<sup>11</sup> Monthly Disconnections reports are filed by all IOUs with the Commission on docket 18-07-005 on the 20<sup>th</sup> of each month.

3. Determine which interventions or combination of interventions are effective in arrearage and disconnection reductions.
4. Based on overall evaluation findings, recommend if case management pilot should expand in scale beyond the pilot phase.
5. Conduct data assessment:
  - a) Identify data needs and recommend data collection and management processes for both IOUs and CBOs.
6. Perform Impact Evaluation
  - a) Conduct Baseline Assessment
  - b) Conduct quasi-experimental design comparing participants and matched non-participants to measure pilot impacts for different customer segments, geographic factors, program enrollment status, and case management approaches.
  - c) Conduct evaluability assessments given the recruitment and data collection efforts
7. Perform process evaluation:
  - a) Design and launch surveys with customers, CBOs, and other stakeholders.
    - Survey and/or interview subject matter experts, stakeholders, and randomly selected customers to identify root causes and solutions for arrearages and disconnections
  - b) Identify opportunities for process and customer journey improvements.
  - c) To the extent possible, compare case management effectiveness across different CBOs, and identify factors contributing to efficiency and effectiveness.
8. Additional Scope:
  - a) Review past examples of arrearage and disconnection reduction efforts in other states, and recommend lessons learned and best practices for pilot and potential future expansion.

D. 22-04-037 directs the CBO Pilot Working Group to prepare an informal evaluation after the CBO Pilot has been in effect for one year, as well as a process for conducting a formal evaluation.<sup>12</sup> The IOUs propose this informal report be filed 12 months after the opening of the enrollment period to ensure a sufficient basis for the report.

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<sup>12</sup> D. 22-04-037, p. 30.

## H. Budget and Cost Tracking

The proposed pilot case management budget was developed in collaboration with the CBO Pilot Working Group, with additional details on the marketing, evaluation and administration developed by the IOUs. The administration portion of the budget includes costs for IOU staff to manage the pilot contracts, provide single point of contact requested by CBOs, payment processing, reporting requirements, as well as targeted marketing support to eligible customers, executed in the first 6 months of the pilot to help build awareness and drive enrollments. Costs are anticipated to be tracked and funded through the COVID-19 Pandemic Protections Memorandum Account (CPPMA). The proposed budget is shown below.

**Table 3: Proposed Pilot Budget**

<b>Category</b>	<b>PG&amp;E</b>	<b>SDG&amp;E</b>	<b>SCG</b>	<b>SCE</b>	<b>Total</b>
Case Management Planning/Overhead	\$80,000	\$40,000	\$40,000	\$40,000	<b>\$200,000</b>
CBO Outreach, Customer Enrollment and Reporting	\$1,100,000	\$550,000	\$550,000	\$550,000	<b>\$2,750,000</b>
Case Management Services and Reporting	\$2,220,000	\$1,110,000	\$1,110,000	\$1,110,000	<b>\$5,550,000</b>
<b>Total Arrearage Case Management CBO Services</b>	<b>\$3,400,000</b>	<b>\$1,700,000</b>	<b>\$1,700,000</b>	<b>\$1,700,000</b>	<b>\$8,500,000</b>
EM&V	\$400,000	\$200,000	\$200,000	\$200,000	<b>\$1,000,000</b>
ME&O	\$185,000	\$50,000	\$60,000	\$60,000	<b>\$355,000</b>
Administration*	\$415,000	\$400,000	\$120,000	\$450,000	<b>\$1,385,000</b>
<b>Total IOU Marketing, Evaluation and Administration</b>	<b>\$1,000,000</b>	<b>\$650,000</b>	<b>\$380,000</b>	<b>\$710,000</b>	<b>\$2,740,000</b>
<b>Grand Total</b>	<b>\$4,400,000</b>	<b>\$2,350,000</b>	<b>\$2,080,000</b>	<b>\$2,410,000</b>	<b>\$11,240,000</b>

\* Administration portion of the budget includes Single Point of Contact costs to support CBOs with specific customer account resolution issues

**I. Timeline**

The timeline for implementing the CBO Pilot is dependent on when the IOUs receive CPUC approval of this AL:

**Table 4: Proposed Timeline**

<b>Date</b>	<b>Activity</b>
8/16/2022	Arrearage CBO Case Management Pilot Program plan AL due, including data tracking requirements from working group meetings
0 day	Decision date of CPUC approval to implement
0 day + 60 days	Competitive solicitation process issued to select CBOs for participation; parallel RFP issued for Third Party Evaluator
0 day + 120 days	Qualified CBO proposals and Third Party Evaluator proposals submitted, reviewed, and selected
0 day + 180 days	Purchase orders and contracts awarded for CBOs and Third Party Evaluator
0 day + 210 days	Provide participating CBOs training, on-boarding, and program ramp-up support
0 day + 240 days	Pilot program kick-off and outreach implementation; solicitation of targeted arrearage customers; CBOs operationalize enrollment support, CBOs support pilot program tracking and reporting; Third Party Evaluator work begins
0 day + 330 days	Case Management 12 month evaluation period begins
0 day + 420 days	Enrollment period ends. CBO Case Management Pilot Program has 6 months days to enroll customers in the pilot program. If full enrollment is not met, pilot metrics will be based on the enrollments within the first 6 month timeframe
0 day + 690 days	Pilot close out. Last customer served and checked on
0 day + 870 days	Third Party Evaluator findings and recommendations provided

**Conclusion**

PG&E respectfully requests the Commission approve this Tier 3 advice letter as submitted with an effective date of April 18, 2022, the date of issuance associated with D.22-04-037.

## **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than September 6, 2022, which is 21 days after the date of this submittal.<sup>13</sup> 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

Greg Anderson  
Regulatory Tariff Manager  
San Diego Gas & Electric Company  
GAnderson@sdge.com  
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Connor Flannigan  
Managing Director, State Regulatory Operations  
Southern California Edison Company  
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Managing Director, Regulatory Relations  
Southern California Edison Company  
c/o Karyn Gansecki  
E-mail: Karyn.Gansecki@sce.com

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<sup>13</sup> The standard 20-day protest period ends on September 5, 2022, which is the Labor Day holiday.

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 April 18, 2022, the date of issuance associated with D.22-04-037.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for R.18-07-005 and R.21-02-014. Address changes to the General Order 96-B service list should be directed to PG&E at email address [PGETariffs@pge.com](mailto: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](mailto:ProcessOffice@cpuc.ca.gov). Send all electronic approvals to [PGETariffs@pge.com](mailto: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:**

Attachment 1: Programs Overview

cc: Service List R.18-07-005, R.21-02-014



# 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) #: 4643-G/6679-E, et al.

Tier Designation: 3

Subject of AL: Joint Submittal Community-Based Organization Arrears Case Management Pilot Proposal in Compliance with D.22-04-037

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.22-04-037

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: 4/18/22

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:  
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

Advice 4643-G/6679-E, et al.  
August 16, 2022

# **Attachment 1**

## **Programs Overview**

Priority Tier	Program Name	Program Description	Non-CARE/FERA Eligible	PG&E Program	SCE Program	SDG&E Program	SoCalGas Program	Non-IOU Program
Tier 1	Calif Alternate Rate for Energy (CARE)	A monthly discount of 20% or more on gas and electricity. Participants qualify through income guidelines or if enrolled in certain public assistance programs.		X	X	X	X	
	Family Electric Rate Assistance (FERA)	A monthly discount on your electric bill if your household has three or more people and qualifies for the income guidelines.		X	X	X		
	Energy Savings Assistance Program (ESAP)	Provides qualified customers with energy-saving improvements at no charge. Measures are offered to customers that can be installed at their homes at no cost.		X	X	X	X	
	Neighbor-to-Neighbor Fund	SDG&E's Neighbor to Neighbor Fund helps pay the energy bills in the amounts of \$150 or \$300 for Medical Baseline Life Support customer who are experiencing a temporary financial hardship . The program is funded and sustained by contributions from shareholders, utility employees, voluntary contributions from ratepayers				X		
	Energy Assistance Fund (EAF)	EAF is a program that has been helping low-income residents pay their electricity bills since 1982. EAF is funded through voluntary donations from SCE employees, shareholders, and customers. Participants may receive a maximum of \$100 once per 12 months. Donations may be one-time contributions or fixed monthly donations made by SCE bill deductions, United Way of Greater Los Angeles, or at sce.com/EAF.			X			
	Gas Assistance Fund (GAF)	The GAF offers a one-time grant to help customers pay their natural gas bills.					X	
	Relief for Energy Assistance through Community Help (REACH)	A one-time energy credit for customers for when a sudden hardship occurs.		X				
	Medical Baseline	Provides additional baseline allowance for customers with special energy needs related to a medical condition	X	X	X	X	X	
	Budget Billing- PG&E Level Pay Plan- SDG&E, SCG, SCE	The Budget Billing program averages your energy costs over the previous 12 months to determine your monthly payment amount. Budget Billing helps offset high winter heating and summer air conditioning peak bills and provides more predictable monthly energy costs to help customers budget expenses.	X	X	X	X	X	
	Payment Arrangements	Customers keep service on by making Payment Arrangements. Customers can schedule payment of the total current balance over several months to help manage temporary financial strains	X	X	X	X	X	
Arrearage Management Program (AMP)	A debt forgiveness plan for eligible residential customers who are enrolled in CARE or FERA, owe at least \$500 or more on their gas and electric bill (or \$250 or more for gas-only customers), and are more than 90 days past due.		X	X	X	X		
Low-Income Home Energy Assistance Program (LIHEAP)	LIHEAP is a federally funded assistance program overseen by the California Department of Community Services and Development (CSD) and administered by 31 Action Agencies throughout California. The program offers help with residential utility bill payment, emergency assistance with residential energy-related crisis (utility shut-off notices and energy-related life-threatening emergency), and home weatherization.						X	
Priority Tier	Program Name	Program Description	Non-CARE/FERA Eligible	PG&E Program	SCE Program	SDG&E Program	SoCalGas Program	Non-IOU Program
Tier 2	Self-Generation Incentive Program (SGIP)	Self-Generation Incentive Program (SGIP) provides incentives to support existing, new, and emerging distributed energy resources. SGIP provides rebates for qualifying distributed energy systems installed on the customer's side of the utility meter.	X	X	X	X	X	
	WaterSaver	WaterSaver automatically shifts some of the customer's energy use to lower priced times so that the water is heated at a lower cost and then kept hot for when needed. Customers are rewarded for participation in this program (\$50 gift card for enrollment, plus an additional \$5 gift card credit for every month of participation).	X	X				
	AC Cycling: Smart AC- PG&E, SDG&E Summer Discount Plan- SCE	The SmartAC Program is an air conditioning direct load control program that offers enrollment to residential customers. PG&E operates the program May 1 through October 31. The program currently offers direct installation of load control receivers (LCR). These devices control air conditioning compressors using sophisticated "cycling" strategies, which perform calculations to reduce energy demand based on different factors including run-time profiles of the customer.	X	X	X	X		
	AC Saver - Smart Programmable Thermostats- SDG&E Smart Energy Program- SCE	The AC Saver Program Includes Smart Thermostats that can be signalled during a system peak load .	X		X	X		
	SDG&E Technology Deployment	Technology Deployment Program Pays an incentive to customers that purchase, install and register their thermostat into SDG&E's AC Saver Program.	X			X		
	Power Saver Rewards (ELRP)	The Power Saver Rewards Program is a program that provides customers with a credit for reducing their energy use on Flex Alert Days between the hours of 4 - 9pm. The program runs from May 1 thru October 31.	X	X		X		
	Pay for Performance - Comfortable Home Rebates	Home maintenance and upgrade program focused on air conditioning efficiency and other home comfort upgrades (ex. Heating, cooling, water heating, insulation, duct work, air sealing, lighting, and pool pumps). Cost varies depending on measures selected, rebates from \$585 to \$3,500 depending on measures selected and CEC Climate Zone. Customer residence must be single family or 2-4 unit structure. Open to all PG&E Territory.	X	X				
	Pay for Performance - Home Intel	In-depth analysis of your home's energy use, customized recommendations and energy coaches to help you. Includes monthly energy efficiency progress report. Open to all PG&E Territory.	X	X				
	Residential Energy Advisor - Home Energy Checkups	Through an easy online audit about our customer's home and lifestyle habits, customers participating in the Home Energy Checkup can receive an estimate of what's using energy in their home and a list of personalized, suggested improvements from PG&E that can help save energy and costs.	X	X		X		
	Continuous Energy Feedback Program- PG&E Behavioral Program: Home Energy Reports- SDG&E	1) Home Energy Reports: a user-friendly print, email and/or video communication with personalized information about energy use. Up to 2.9M customers will be participating in the program. 2) Bill Forecast Alert: use email, text or voice messages to help our customers save energy and money by being notified when they are likely to use more energy than usual for a billing period. Up to 1.4M will be participating in the program. 3) TOU Coach: Email to customers about electric plan & electricity use and make recommendations on how to shift or reduce electric use in order to save money.	X	X		X		
	SW HVAC - Statewide Heating, Ventilation and Air Conditioning	This statewide program focuses on HVAC units for residential customers. Working with distributors to provide a buy-down of efficient HVAC units across the state.	X			X		
	Residential Energy Solutions	This program focuses on direct install measures for the single family homes.	X			X		
	Residential Energy Efficiency	Downstream rebates for customers who purchase qualified products. Rebates currently available for Smart Thermostat and Heat Pump Water Heaters.	X	X		X	X	
	Low-Income Weatherization Program (LIWP)	California's Low-Income Weatherization Program (LIWP) provides low-income households with solar photovoltaic (PV) systems and energy efficiency upgrades at no cost to residents. The program reduces greenhouse gas emissions and household energy costs by saving energy and generating clean renewable power.						X
	DAC-SASH	The California Solar Initiative's DAC Single-family Affordable Solar Homes (SASH) provides solar incentives on qualifying affordable single family housing in disadvantaged communities						X

**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.

Resource Innovations

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