

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6798E
As of January 30, 2023

Subject: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013

Division Assigned: Energy

Date Filed: 12-21-2022

Date to Calendar: 12-23-2022

Authorizing Documents: D1808013

Disposition:	Accepted
Effective Date:	12-21-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(415)973-4587

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

December 21, 2022

Advice 6798-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013

Purpose

In compliance with Decision (D.) 18-08-013, issued on August 17, 2018, in Pacific Gas and Electric Company's (PG&E) 2017 General Rate Case (GRC) Phase 2 Proceeding, PG&E submits this information-only Advice Letter (AL) to report on its progress to increase Family Electric Rate Assistance (FERA) program enrollment.¹

Background

The FERA program (also known as the Lower-Middle Income Large Household Program) provides rate assistance to large households of lower-to-middle-income customers.² The FERA program was designed to assist larger families that are ineligible for the California Alternate Rates for Energy Program (CARE) rate because their income level falls slightly above the CARE program income eligibility limit.

FERA is available for households of three or more individuals that have a total household income of between 200% plus \$1 and 250% of the Federal Poverty Level (FPL) guideline.³ The income threshold increases with each additional family member over

¹ D.18-08-013, Ordering Paragraph (OP) 15, states, "PG&E shall report to Energy Division by the end of 2018, 2019, 2020, 2021, 2022, and 2023 on its progress to increase FERA subscription by filing information-only advice letters that are served on the service list of this proceeding." Additionally, in accordance with D. 21-06-015 OP 185, PG&E provides updates on FERA in the combined monthly and annual reports with the Energy Savings Assistance and California Alternate Rates for Energy monthly and annual reports, with the first combined annual reporting beginning with the 2022 annual report.

² The Commission authorized the FERA program in D.04-02-057.

³ D.05-10-044 increased the lower income limits of the FERA Program were raised to 200%+\$1 of the Federal Poverty Guideline levels.

three people. Eligible FERA participants currently receive an 18% bill discount for their electric usage.⁴

In PG&E's 2017 GRC Phase II proceeding, the California Public Utilities Commission (CPUC or Commission) expressed concern that the FERA program was not highly customer subscribed and provided direction for PG&E to achieve a similar subscription level for FERA as for CARE.⁵

D.18-08-013 prescribed several actions for PG&E to take to increase FERA penetration including focusing efforts on the Central Valley (CV), conducting one or more workshops in the CV, and submitting an updated AL to inform the Commission of PG&E's plan to apply unspent CARE marketing funds to FERA's marketing and outreach efforts.⁶

Based on these directives, PG&E developed and submitted a Marketing and Outreach (M&O) Plan for the FERA program detailing PG&E's CV-focused proposals, and focusing on activities related to the available and unspent CARE marketing funds from PYs 2018-2020 that were allocated to the FERA program.⁷ Also as directed in D.18-08-013, PG&E proposed a longer-term FERA specific M&O proposal and budget in its Testimony for 2021-2026 Low-Income programs and budgets application, filed on November 4, 2019.⁸

The proposed FERA M&O strategies for the 2021-2026 Program Years (PYs) were approved in June 2021 Decision 21-06-015, which also authorized the FERA program's budget for the PYs 2012-2026.⁹ In addition, D. 21-06-015 directed PG&E to increase FERA enrollment to 50% to be reached in 2023, and 70% attained by 2026.¹⁰

Discussion of Enrollment Challenges

Per D.21-06-015, PG&E's 2022 authorized FERA Program administrative budget is \$2,794,400, and \$12,898,000 for electric rate subsidies.¹¹ Through November 2022, PG&E expended \$17,828,521 in total program costs. Of the total expenditure, \$2,020,916 (or 11%) was spent on outreach and administrative activities and \$15,807,605 (or 89%)

⁴ In D.15-07-001, the Commission changed PG&E's FERA discount to a 12% effective discount as a single line-item on PG&E's bills. In 2018, Senate Bill (SB) 1135 amended Public Utilities Code Section 739.12 to increase the FERA discount to 18% effective January 1, 2019.

⁵ D.18-08-013, p. 74.

⁶ D.18-08-013, p. 75

⁷ PG&E filed Advice Letter 3990-G-B/5329-E-B on October 8, 2018, to detail its marketing plans to increase FERA enrollment.

⁸ D.18-08-013, Ordering Paragraph, PG&E Testimony, Chapter II, Section H

⁹ D.21-06-015, Attachment 1, Table 4

¹⁰ Ibid, at pg. 91.

¹¹ Ibid

in electricity rate discounts were provided to 36,873 households (representing 21% of the estimated FERA-eligible households) in PG&E's service territory.

Despite expending \$2M YTD 2022 and \$2.3M in PY 2021 on FERA outreach and marketing, and implementing multiple new strategies and approaches, including use of Community Based Organizations (CBOs), PG&E has attained only 21% program enrollment as of November 2022. Furthermore, the enrollment rate has declined since the start of 2022 due to households being removed during recertification efforts and is expected to decline further when post-enrollment verification is implemented in Q4 2022.

Therefore, the 40% interim 2022 goal established in D.21-06-015 for PY 2022¹² will not be met in 2022 and reaching the 50% enrollment goal in 2023 will require a substantive increase, beyond what can be anticipated, from current rates of both new enrollments and aggressive retention tactics of existing participants.

There are multiple structural challenges with FERA that PG&E believes contributes to the low enrollment percentages. One structural challenge PG&E has observed relates to the presentment of CARE and FERA as one shared application. Despite ongoing FERA-specific messaging, targeted to customers with a higher likelihood for participation in FERA, year-to-date FERA direct marketing campaigns have generated approximately eight CARE enrollments for every one FERA enrollment. In addition, the small difference in income requirements between the two programs makes it so that customers may inadvertently (or even purposefully) estimate income within the range eligible for CARE discount.

Another ongoing challenge is that, when compared with the population of customers eligible for CARE, the population estimated to be eligible for FERA is small, with only ~174,000 customers currently eligible.¹³ Without verified income data to enroll customers in either CARE or FERA based upon their level of income, broader targeting is necessary to find eligible customers, resulting in higher marketing acquisition costs.

PG&E continues to develop and deploy new strategies to try and meet the 40% FERA enrollment goal; yet efforts have not proven sufficient thus far. For example, in Q1 2022, PG&E identified some potential populations that may be eligible, such as college students, farmworkers, and immigrant populations. PG&E has also explored various data sharing pathways to obtain actual customer income information and expedite auto-enrollments; but outside of the Disadvantaged Communities Single-family Affordable Solar Homes (DAC-SASH) program that implemented data sharing of actual, verified income documentation to facilitate auto-enrollment in CARE and FERA in Q3 2022, PG&E has not been successful in obtaining the data clearances needed to obtain

¹² Ibid

¹³ On February 14, 2022, PG&E, on behalf of the IOUs, filed the Annual Estimates of CARE Eligible Customers and Related Information. This number reflects estimates of PG&E's FERA Eligible Participants for 2022 that was derived from the same data set as CARE.

customer income information from other programs. For example, the CA Franchise Tax Board (CalPA) was contacted but the request was denied because of privacy issues.

Throughout 2022, PG&E has consulted with multiple Community Based Organization (CBO) Advisory Groups to identify new strategies that could be explored. Feedback from the CBO advisory groups underscored the importance of on-the-ground activities and utilizing a trusted community partner to deliver the messaging. In response to CBO input, in July 2022, PG&E launched a FERA CBO Pilot utilizing six newly contracted CBOs to begin supporting ME&O efforts. This 18-month CBO FERA pilot, which is scheduled to run through December 2023, is designed to engage CBOs in driving FERA awareness and enrollments, while also promoting other supporting programs. While outcomes from July-Nov. 2022 have not generated the desired enrollment results, PG&E continues to work with the CBOs to modify their M&O plans to try and increase enrollment. PG&E believes that the CBOs have been unsuccessful due to the many structural challenges of the program, and primarily, the small eligibility pool.

PG&E elevated the challenges of meeting the FERA enrollment goals to the Energy Division (ED) via meetings held on August 3, 2022, and October 13, 2022, with SCE and SDG&E participating in one or both meetings. PG&E plans for follow-up conversations with ED and the other IOUs as it explores various pilot programs and new strategies to increase enrollment and reduce attrition. PG&E plans to continue engaging with a wide array of stakeholders and work collaboratively to identify novel and creative strategies to meet FERA's enrollment goals; however, given the outcomes to date, there will need to be substantive growth to meet the program's enrollment goals.

Progress Report Toward Increasing FERA Enrollment

In compliance with D.18-08-013, PG&E reports on its progress toward increasing FERA enrollment from December 1, 2021, until November 30, 2022.¹⁴

¹⁴ FERA statistics for the month of December 2022 are not available at the time of this AL submittal.

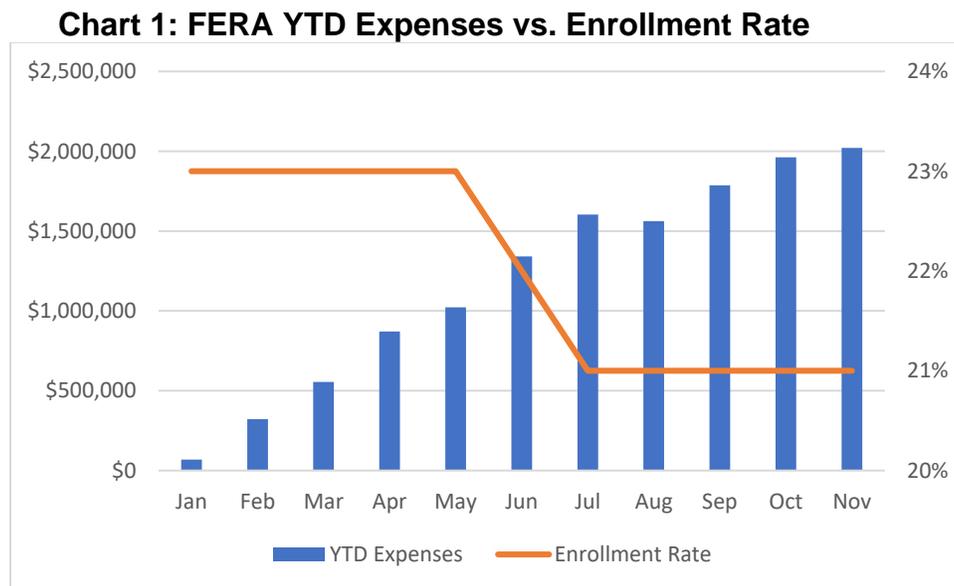
I. Participant Information

Table 1: FERA Program Enrollment from December 1, 2021 - November 30, 2022

Month/Year	Estimated Eligible Customers	Enrolled Customers	Enrollment Rate	Discount Provided to Enrolled Customers
December 2021	152,625	38,862	25%	\$1,230,503.56
January 2022	174,219	39,800	23%	\$1,211,771.79
February 2022	174,219	39,689	23%	\$1,086,722.48
March 2022	174,219	39,907	23%	\$1,296,150.83
April 2022	174,219	39,730	23%	\$1,122,799.98
May 2022	174,219	39,278	23%	\$1,137,838.03
June 2022	174,219	38,948	22%	\$1,560,762.29
July 2022	174,219	36,643	21%	\$1,922,612.82
August 2022	174,219	36,324	21%	\$2,028,079.92
September 2022	174,219	36,961	21%	\$1,963,377.32
October 2022	174,219	36,770	21%	\$1,342,640.69
November 2022*	174,219	36,873	21%	\$1,134,848.38
Total	174,219	36,770	21%	\$17,038,108.09

(a) Final annual data for 2022 will be reported in the FERA Annual Report, to be filed on May 2023.

Chart 1 below shows FERA year-to-date expenses cumulatively (for administration, and marketing and outreach), compared to the FERA enrollment rate.



As shown in Chart 1, at the beginning of 2022, the FERA enrollment rate was 23%. Despite spending approximately \$2M throughout the year, primarily on outreach, the FERA enrollment rate has decreased to 21%. This trend is due to increased removals from FERA from unsuccessful recertifications, and an increased eligible pool from February 2022's eligibility estimates. In addition, PG&E's marketing efforts were successful just not in enrolling FERA but CARE customers.

II. Marketing

Key Findings:

- o FERA specific marketing campaigns to the expected FERA eligible target audience continue to drive CARE enrollment at a ratio of approximately 8:1
- o Remarketing FERA to previously enrolled customers result in a higher CARE enrollment rate
- o FERA marketing non-responders¹⁵ have low awareness of most PG&E programs
- o Digital media campaigns drive strong click-through rates and traffic to the landing page
- o New channel testing shows promise for increasing the recertification rate

PG&E continued to prioritize FERA outreach efforts in 2022. Marketing and outreach plans engaged customers across several channels such as digital media, direct mail, email, and via community-based organizations to increase reach and awareness.

Utilizing multiple communication channels provides customers with options for how they prefer to consume marketing messages and respond to communications.

Ongoing test plans and new campaign strategies were executed throughout the year such as a new monthly direct marketing campaign, an "Always-On" paid media campaign, creative message and format tests, and use of new channels to target FERA messaging to potentially eligible customers. PG&E also conducted messaging research with customers who previously received marketing messages but did not enroll to inform new FERA creative development. Finally, with the impact of the recertification process on FERA enrollment, greater focus was placed on communications to encourage retention of enrolled customers.

However, even with considerable marketing and outreach effort to target FERA eligible customers, PG&E is not realizing the volume of new enrollments needed

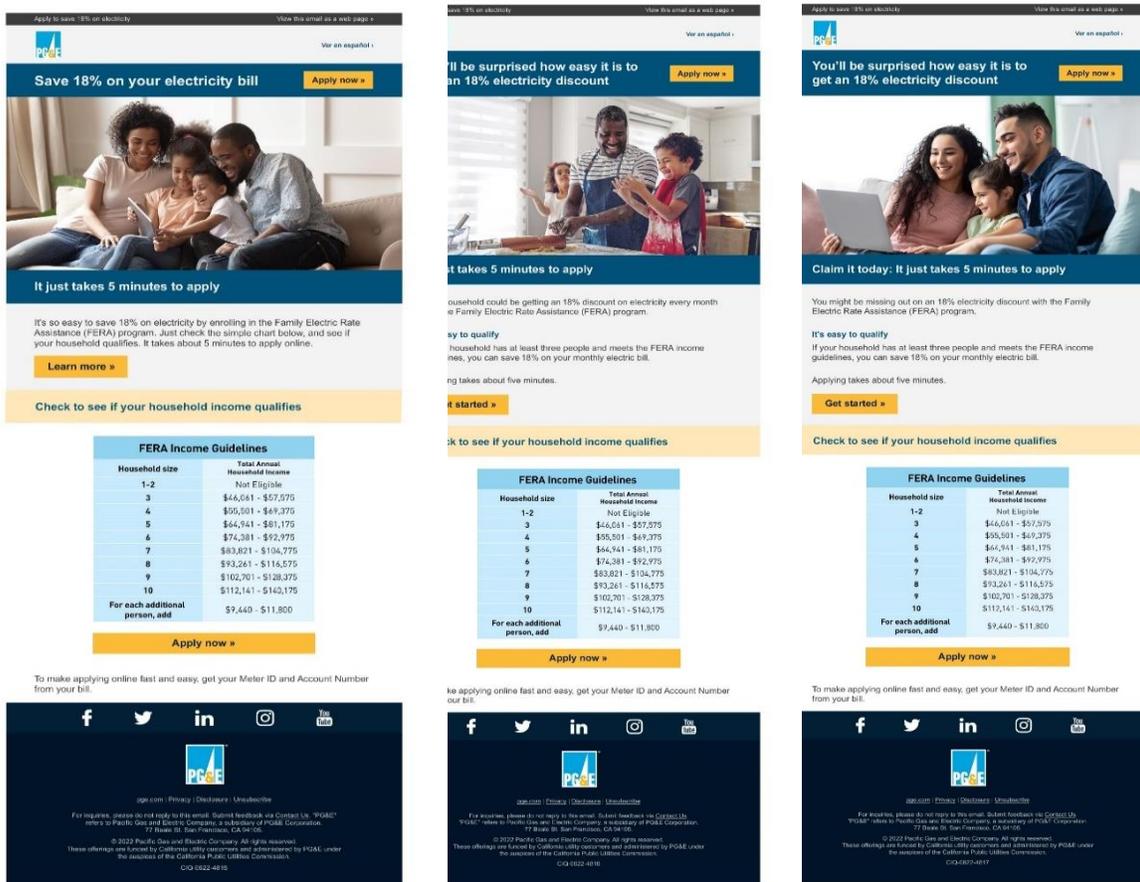
¹⁵ Non-responders are defined as customers who received two or more CARE or FERA direct marketing campaigns within the past 24 months but did not enroll.

to grow the FERA enrollment rate, as detailed in the Discussion of Enrollment Challenges Section.

Direct Mail and Email Campaigns

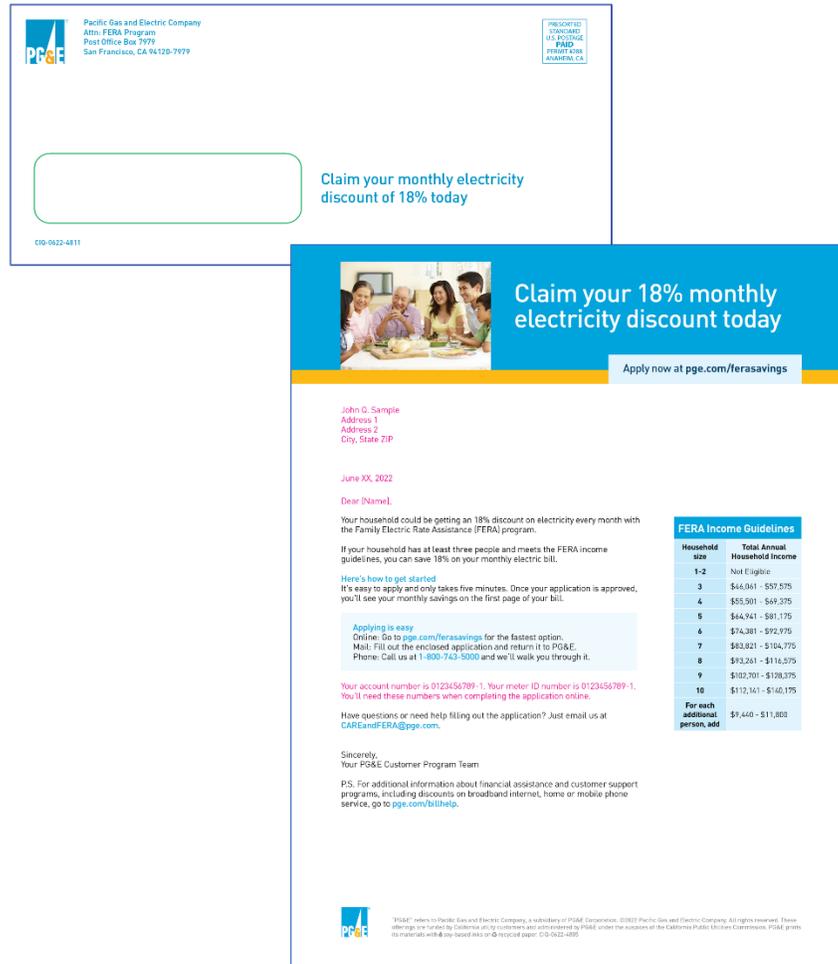
In 2022, PG&E adjusted the acquisition strategy and target segment definitions to allow for more timely communication to potentially eligible customers. An automated monthly campaign launched in June targeting customers in top deciles of the FERA propensity model¹⁶ who have not received previous campaign messages. The goal of the changes to the campaign approach are to deliver the FERA message to customers in a timely manner to increase overall enrollment rates, while maintaining an efficient cost-per-enrollment. Customers receive a series of up to three messages (one per quarter). If they do not enroll, they move into the non-responder segment for future campaigns.

Figure 1 – FERA Email Creative: Touch 1, Touch 2, Touch 3 versions



¹⁶ The FERA propensity model assigns customers a Decile score from 1 to 10, with one being the most likely to enroll in FERA and 10 being the least likely to enroll.

Figure 2 – Example of FERA Direct Mail Creative



Within the new campaign structure (monthly deployment, up to three touches with one touch per quarter), PG&E is conducting channel testing for customers with a valid email address to analyze the enrollment impact of email only communication versus email plus direct mail communication. For customers without a valid email address, a split test is being conducted to determine the enrollment rate difference when the direct mail includes a paper application versus a package without a paper application.

Campaign results for June 2022 (launch month) through October 2022 (latest available campaign data) are shown in Table 2 below. The initial channel test results indicate that customers who receive email plus direct mail have higher enrollment rates in both FERA and CARE (in Table 2, Test A: EM+DM). Early results for the direct mail application test (in Table 2, Test B) are mixed based on FERA and CARE program enrollment rates.

However, overall enrollments to date are higher for the mail package with application. An analysis will be conducted after the first customers to enter the new campaign structure complete the three-touch journey in February 2023 to look at campaign performance and efficiency.

Table 2 – FERA Monthly Acquisition Campaign Results

Monthly Campaign	# Contacted	Enrolled in FERA	FERA Enrollment %	Enrolled in CARE	CARE Enrollment %	Total Enrollment	% FERA	% CARE	Overall Enroll Rate
Test A: EM only	100,664	248	0.25%	2,994	2.97%	3,242	8%	92%	3.22%
Test A: EM+DM	100,587	450	0.45%	3,853	3.83%	4,303	10%	90%	4.28%
Test B: DM w/app	45,758	88	0.19%	1,066	2.33%	1,154	8%	92%	2.52%
Test B: DM w/out app	45,911	108	0.24%	922	2.01%	1,030	10%	90%	2.24%
Total YTD	292,920	894	0.31%	8,835	3.02%	9,729	9%	91%	3.32%

In addition to the monthly acquisition campaign, PG&E resumed quarterly campaigns targeted to customers who failed to recertify for FERA after recertification requirements were paused as part of the COVID-19 emergency customer protections that ended June 2021.

Failed to recertify campaign results highlight the ongoing challenge to increase FERA enrollment. Even when remarketing the program to previously enrolled FERA customers, the campaign generates significantly more CARE enrollments. Of the over 4,000 customers contacted for the Q1 and Q2 campaigns, 69% of the enrollments generated were for CARE.

Table 3 - FERA Failed to Recertify Campaign Results

Campaign	# Contacted	Enrolled in FERA	Enrolled in CARE	Total Enrollment	% FERA	% CARE
Q1 Failed to Recertify	2,373	126	245	371	34%	66%
Q2 Failed to Recertify	1,737	79	215	294	27%	73%
Total YTD	4,110	205	460	665	31%	69%

Non-Responder Message Research and Creative Development

In 2022, PG&E conducted FERA messaging research, sending a brief online survey to approximately 30,000 customers who previously received FERA marketing but did not enroll.

More than 950 customers responded and were randomly shown one of six variations of FERA messages (each message was viewed and rated by approximately 148-179 customers). Customer responses indicate that FERA awareness continues to lag behind CARE (31% of respondents indicated awareness of FERA vs. 40% aware of CARE). Another third of respondents stated they were not aware of any of the programs listed.¹⁷

Of those customers who indicated they were aware of FERA, 91% have never applied for the program, and 81% have never applied for CARE. The primary reason cited for not applying is the belief they do not qualify, with 77% stating they did not meet the qualifications and 23% stating they did not think they would qualify.

About half of respondents indicated intent to open most of the envelopes based on the opportunity to save money, and felt the message was simple and clear. However, customers that viewed the version that led with the message about having three or more people were less likely to indicate that they would open the envelope (59% of respondents indicate less than three people in the household).

When shown the letter versions, customers rated the clarity of the message high, but appeal and intent to visit the website to act was low. Customer interest wanes once they see income guidelines table on the letter and determine they will not qualify for the program.

These results were not altogether surprising given that non-responder audiences may be less aware since they may discard communications without reviewing the message. Additionally, the small eligible population for FERA means that when casting a wide net to reach potential customers, PG&E inevitably reaches customers who are not eligible for the program.

The insights and top-rated message from the research were used to develop a new FERA direct mail and email for testing with the non-responder audience. In November, the new email version was deployed to approximately 180,000 customers who previously received CARE or FERA direct marketing but did not enroll. Additionally, the direct mail version was created in three print formats for split testing. The test includes a traditional letter package versus an oversized

¹⁷ Survey Question: Which of the following PG&E programs, if any, are you aware of? Select all that apply. Options shown: Medical Baseline (44%), CARE (40%), Budget Billing (38%), Energy Savings Assistance Program (35%), FERA (31%), None of the above (30%)

Digital Media Campaign

The “Always-On” digital media campaign remained an important element of the FERA marketing strategy. PG&E deployed multiple layers of paid digital media tactics including search, Google Discovery (Gmail) ads, display and native (contextual) advertising. Native ad creative (for example, ads that appear as sponsored on a site or page with similar/relevant content) was refreshed, and the latest version launched in July.

Figure 4 – FERA Native Ad sample (English and Spanish versions)



The digital campaign buy was territory-wide, with an added layer of increased spending in select zip codes as part of the ongoing strategy to increase awareness with Hard-to-Reach customers. Zip codes were identified as Hard-to-Reach based on lower CARE and FERA penetration rates, and those that were in designated rural and/or high poverty areas.¹⁸ PG&E plans to review the Zip code targeting strategy and results in 2023 and may adjust the media plan approach based on lessons learned.

Through October, the campaign saw ongoing improvement in performance metrics, delivering 86 million impressions (80% of impressions projected through year end). Impression volume increases are led by display and native ads.

The strong impression volume drove clicks and landing page visits beyond the annual media plan goal. Clicks beat projections by over 43% (503,432 clicks) with strong performance in Google tactics and native ads. Resulting landing page visits

¹⁸ A High Poverty household has income at or below 100 percent of the Federal Poverty Level Guidelines. Rural areas are defined as those isolated from larger metropolitan areas, by distance or other physical features. PG&E has identified specific zip codes and counties within PG&E’s territory that fall within these definitions for targeting purposes. The 2020 Hard-to-Reach zip code targeting list included 367 (out of 1,001) prioritized zip codes which capture most of the CARE eligible, non-enrolled, FERA eligible, non-enrolled, Rural and High Poverty customers.

(321,593) exceeded plan projections by more than 84%. The cost per landing page visit (CPLPV) is less than half of the campaign CPLPV projection and 2021 historical (\$1.28 vs. \$2.74).

Owned and Earned Media

PG&E also continued to leverage in-house tools and resources to promote FERA, including bill inserts, Home Energy Report (HER) marketing modules, and articles in the low-income targeted version of the newsletter.

Additionally, workshops, webinars and press releases allowed a regional approach to reaching customers. For example, a press release coordinated with the annual income guidelines update used a regionalized approach to drive FERA awareness by highlighting the estimated eligible populations by county.

Marketing Efforts to Support Retention

In addition to marketing designed to drive new FERA enrollments, efforts continued to support improved program retention.

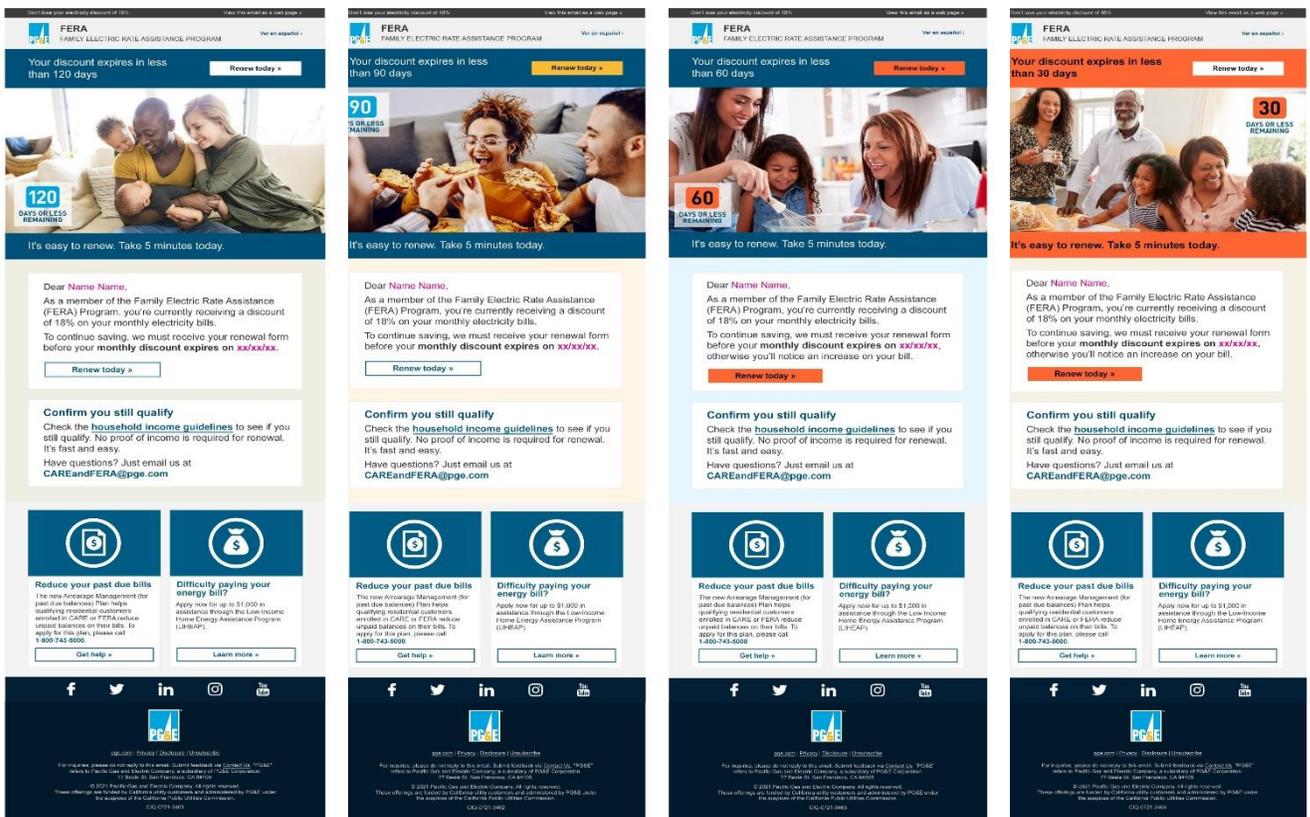
PG&E's FERA retention outreach in 2022 focused on reducing attrition caused by customers' failure to recertify for the program. FERA-enrolled customers are required to recertify their eligibility every two years (every four years for those on a fixed income).

Each month, PG&E sends email notification to customers in Deciles 1 and 2 who were automatically recertified. The communication alerts them that they were automatically re-enrolled, and no further action is required to continue to receive the FERA discount. The email encourages the customer to check the current income guidelines to confirm continued eligibility and indicates that the customer can opt-out of the program if they are no longer qualified. All customers who are not automatically recertified are included in the recertification reminder campaign. Customers without a valid email address are sent direct mail notification at 90-days and 30-days prior to the customer's FERA program end date.

Customers with a valid email address also receive reminders via email notification. Email communication starts at 120-days prior to program expiration date¹⁹ and continues at 90-days, 60-days, and 30-days prior to the recertification date. The emails use visual cues such as color and animation, as well as messaging to create a growing sense of urgency, with a call-to-action to re-enroll before the program end date.

¹⁹ The FERA propensity model assigns customers a Decile score from 1 to 10, with one being the most-likely to be FERA-eligible and 10 being the least likely to be FERA-eligible. CARE and FERA auto-recertification are executed for Deciles 1-2.

Figure 5 – Recertification Reminder Email Creative



PG&E began testing additional communication channels for recertification reminders in 2021, including SMS/text message and outbound automated calls. As part of an ongoing test, some customers that are due to recertify will receive a call or a text message at 120-days and 30-days prior to the program end date.

In Q3 2022, the text portion of the test was expanded to ensure as many customers as possible were receiving text reminders and to allow data levels to achieve statistical significance (i.e., testing a higher volume of customers to analyze results). Analysis is planned in 2023 to evaluate the impact of the addition of a text reminder on recertification rate once enough customers have completed the full recertification communication journey.

Results to date for test cells with an automated call are trending higher than the control cells (customers who do not receive the additional call reminders). As more of the test population completes the recertification communication journey, PG&E expects to see that the additional communication touchpoints have a positive impact on recertification rate. The planned analysis and lessons learned from testing will inform recommendations for campaign optimization in 2023.

To further support FERA program retention and enhance the customer experience to improve overall customer satisfaction, PG&E began development of a new FERA Welcome campaign. The campaign will deploy to newly enrolled and re-enrolling customers, providing timely communication of the program savings benefit, program guidelines and how to monitor savings each month to demonstrate the value of being enrolled. The communications will be personalized with dynamic content including other relevant cost and energy saving programs based on customer data attributes. The new FERA Welcome campaign is planned for launch in Q1 2023.

III. Outreach

Outbound Financial Assistance

In May 2020, PG&E established an outbound calling campaign to reach customers with past due amounts. The outbound calls provided customers with flexible pay plans as well as information about CARE, FERA, Medical Baseline, and other agency assistance programs. Customers who were deemed to be eligible for a specific program were enrolled. Final annual data for 2022 will be reported in the FERA Program Annual Report, to be filed in May 2023.

The campaign information is only through November 2022, and it consisted of customers who Customer Service Representatives (CSRs) were able to contact directly. The customers who could not be reached received a voicemail with information regarding financial assistance programs.

The campaign was also successful in identifying over \$5M in potential savings from customers switching to a different rate option. Customers with a past due balance were directed to Low Income Home Energy Assistance Program (LIHEAP) where they received pledges totaling \$646,018, and/or enrolled in the Arrearage Management Plan (AMP) where eligible.

Table 4: Outbound Campaigns for Financial Challenged Customers from January 2022 - November 30, 2022

	Totals
Number of Customers Reviewed	167,508
Number of Customers Called	161,330
Enrolled in CARE and/or FERA	590
LIHEAP Pledge Amounts	\$646,018
Savings from Completed Rate Changes	\$5,373,914

Community-Based Organizations (CBOs)

PG&E utilizes its broad network of Community-based organization (CBO) partners to conduct outreach for FERA and other assistance programs available to customers. These organizations play an important role in helping PG&E

communicate the availability of various assistance programs including FERA to customers. In March and April of 2022, PG&E entered into paid agreements with eight CBOs resulting from a proactive solicitation PG&E developed (outside of a Commission directive) to engage CBOs in providing marketing, education, and outreach (ME&O) to hard-to-reach and disadvantaged customers. The eight CBOs currently working on this 24-month ME&O Pilot actively promote FERA, CARE, and other supporting programs such as Medical Baseline, Smart AC, Power Saver Rewards, Water Saver, and AMP. Contracted CBOs utilize direct mail, in-office intake, social media, newsletters, online webinars, and partnerships with other community-based organizations to conduct the outreach.

FERA Program CBO Pilots

PG&E launched its CBO FERA Pilot in July 2022 with six CBOs. This is a proactive approach PG&E is taking to maximize the engagement of CBOs in the ME&O activities for FERA and is not a Commission-directed pilot. The FERA Pilot differs from the other ME&O outreach in that there is a heavy focus on FERA. CBOs were tasked with reaching customers who may be eligible for FERA, while also promoting other programs that these customers may be eligible for such as Medical Baseline, Smart AC, Power Saver Rewards, Water Saver, AMP, CARE, and other supporting programs. This effort heavily relies on in-person outreach to help reach more rural and disadvantaged customers who may not be eligible for CARE but may be eligible for FERA. The six CBOs in this 18-month paid pilot include large faith-based organizations, farm worker groups, community development organizations, and environmental justice CBOs. Through October 2022, the six CBOs reported being able to reach ~ 25,000 customers.

FERA Program Studies

Categorical Eligibility Study: D.21-06-015 authorized a Categorical Eligibility Study to be completed by December 2022, and for the IOUs to file a joint Tier 2 advice letter 60 days after study completion, proposing an updated list of categorical programs for enrollment in the ESA, CARE, and/or FERA programs.²⁰ The study will also assess whether any recommended categorical programs would be suitable candidates for CARE or FERA automatic enrollment. The Joint Utilities requested an extension from December 31, 2022, to June 30, 2023, to complete the study to avoid compromising the quality of the results. On October 27, 2022, the extension of time was granted by the Commission. Additionally, compliance with the 60-day Tier 2 advice letter directive in OP 171 of D.21-06-015 will apply to the new completion of the Categorical Eligibility study.

²⁰ D.21-06-015, OP 170

In September 2022, responses to stakeholder comments were posted on the CPUC PDA site²¹, following the public workshop held on August 31, 2022, where the study's draft research plan was shared to collect stakeholder feedback. In October and November 2022, study methodology continued to be finetuned, while efforts to gather eligibility and alignment information from the potential categorical programs continued.

IV. FERA Retention Campaigns

Auto-Recertification

D. 21-06-015 directs PG&E to implement an auto-recertification for customers who have a high probability of being FERA eligible. Eligibility is defined as those households that have at least 80 percent probability of being FERA-eligible as identified by FERA probability model. PG&E already implemented FERA auto-recertification in 2020 in alignment with the eligibility definition in the Decision.

High Usage (HU) PEV

In November 2022, PG&E started developing a process to flag customers for HU PEV after three months of exceeding 400 percent baseline consumption within a 12-month period.

Conclusion

In conclusion, this letter contains the 2022 FERA results as required by D.18-08-013.

Protests

This is an information-only AL submittal. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this AL, and it is not subject to protest. Instead, PG&E is reporting progress to increase FERA program enrollment.

Effective Date

PG&E requests that this information-only advice letter become effective upon date of submittal, which is December 21, 2022.

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 A.16-06-013, A.14-11-007 et al., and A.19-11-003 et al. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other

²¹ ESA/CARE/FERA Categorical Eligibility Study - Draft Work Plan. Evergreen Economics, September 2022. <https://pda.energydataweb.com/#!/documents/2661/view>.



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: 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) #: 6798-E

Tier Designation: Information-Only

Subject of AL: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013

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.18-08-013

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: 12/21/22

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 proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

Contact Name:
Title:
Utility/Entity Name:

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

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

Clear Form

**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 Blaising 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
Dish Wireless L.L.C.

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

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
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