

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



**Pacific Gas & Electric Company**  
**GAS (Corp ID 39)**  
**Status of Advice Letter 4783G/7002E**  
**As of October 24, 2023**

Subject: Joint Submittal to Update Number of Eligible Pilot Participants and Modify Pilot Timeline and Evaluation Method for the Small Business Customer Outreach Pilot for Disadvantaged Communities

Division Assigned: Energy

Date Filed: 08-11-2023

Date to Calendar: 08-16-2023

Authorizing Documents: None

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>09-10-2023</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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

AL Certificate Contact Information:

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

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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



August 11, 2023

**Advice Letter 4783-G/7002-E**

(Pacific Gas and Electric Company - U 39-M)

**Advice Letter 5087-E**

(Southern California Edison Company - U 338-E)

**Advice Letter 4271-E/3220-G**

(San Diego Gas & Electric Company ID U 902-E)

**Advice Letter 6177-G**

(Southern California Gas Company ID U 904-G)

Public Utilities Commission of the State of California

**Subject:** Joint Submittal to Update Number of Eligible Pilot Participants and Modify Pilot Timeline and Evaluation Method for the Small Business Customer Outreach Pilot for Disadvantaged Communities

**Purpose**

Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) (collectively, the “Utilities”) hereby submit this Tier 2 Advice Letter (AL) to modify specific implementation and evaluation parameters for the Small Business Customer Outreach Pilot targeted at Small Business Customers in Disadvantaged Communities (DAC) (Pilot). Specifically, this AL updates the (1) approximate number of customers eligible for participation, (2) evaluation methodology for the Pilot, and (3) proposed pilot schedule.

**Background**

On October 28, 2021, pursuant to Ordering Paragraph (OP) 9 of Decision (D.) 21-06-036, the Utilities jointly submitted Advice Letter 4620-E et al. seeking Commission approval of its proposal for a Small Business Customer Outreach Pilot for DACs, which provided the implementation parameters, cost recovery, and timeline for the Pilot.

On November 17, 2021, the California Community Choice Association (CalCCA) submitted a protest to Advice Letter 4620-E et al., claiming that the Advice Letter did not explicitly allow for participation of Small Business Customers that are served by CCAs in

the Pilot and requested that the Utilities be required to explicitly allow participation in the Pilot of CCA Small Business Customers in DACs.

On November 24, 2021, the Utilities responded to CalCCA's protest in which the Utilities refuted CalCCA's claims and referenced several sections of the Advice Letter that included proposals for CCA participation in the Pilot.<sup>1</sup>

After further review and consideration, on September 9, 2022, the Utilities jointly filed Advice Letter 4620-E-A et al. to clarify that Small Business Customers served by CCAs are eligible to participate in this pilot. In this partial supplemental filing, the Utilities also proposed revising the timeline initially proposed to extend the amount of time required to complete the pre-Pilot activities from two months to three months as this additional time was needed to adequately prepare for the Pilot implementation.<sup>2</sup>

On October 18, 2022, Advice Letter 4620-E/E-A, et al., was approved with an effective date of December 1, 2021.<sup>3</sup>

## **Discussion**

The Utilities seek to modify only the following information in the Utilities' proposal for the Small Business Customer Outreach Pilot targeted at Small Business Customers in DACs. All other information submitted in Advice Letter 4620-E/E-A et al. remains unchanged.

### **1. Updated Estimates of Small Business Customers Eligible for Pilot.**

Table 1 in Advice Letter 4620-E, et al., provides estimates of Small Business Customers in DACs by each Utility that were automatically enrolled in the COVID-19 Small Business Relief Payment Plans as defined in, and required, by D.21-06-036<sup>4</sup> as calculated in October 2021, or 28,800. Of those eligible to participate in the Pilot, the Utilities recommended a maximum of 9,550 be included in the outreach for the Pilot. Subsequent preparations for the launch of the Pilot, which began after Advice Letter 4620-E/E-A was approved in October 2022, demonstrated that revisions to these estimates have become necessary as the number of Small Business Customers that are enrolled in the COVID-19 Small Business Relief Payment Plans has decreased. Revised estimates by Utility are provided below. For SCE, due to the significant decrease in the total number of Small Business Customers in DACs that are enrolled in COVID-19 Small Business Relief

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<sup>1</sup> See The Joint Utilities' Reply to Protest of CalCCA's Protest of Joint Submittal regarding Small Business Customer Outreach Pilot for Disadvantaged Communities, at 2.

<sup>2</sup> See [https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS\\_4517-G-A.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS_4517-G-A.pdf), Table 5.

<sup>3</sup> See [https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS\\_4517-G-A.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS_4517-G-A.pdf), at 1.

<sup>4</sup> D.21-06-036 Appendix C.

Payment Plans, SCE is also including in the outreach for the Pilot Small Business Customers in DACs that are enrolled in any payment plan. This change is appropriate as it provides customers in DACs the same opportunity to benefit from this pilot.

**Table 1: Revised Total Customers Proposed for Small Business Customer Outreach Pilot**

Utility	Approximate Number of Small Business Customers in DACs Automatically Enrolled in Payment Plans		Proposed Maximum Number of Small Business Customers for Outreach Pilot	
	As Reported in Advice Letter 4620-E et al.	Revised	As Reported in Advice Letter 4620-E et al.	Revised
PG&E	7,000	6,500	3,500	3,500
SCE	16,000 <sup>5</sup>	750	4,000	750
SoCalGas	5,000	5,001	1,250	1,250
SDG&E	800	720	800	720
Total for Utilities	28,800	12,971	9,550	6,220

## **2. Change to Proposed Evaluation Methodology for the Pilot.**

In Advice Letter 4620-E, et al., the Utilities proposed using a Randomized Control Trial (RCT)<sup>6</sup> methodology to evaluate the success of the Pilot in helping customers located in DACs in lowering energy bills.<sup>7</sup> The Utilities serve notice to the Commission that they plan

<sup>5</sup> SCE was granted an extension by the CPUC until October 29, 2021 to automatically enroll residential and Small Business Customers in their respective payment plans, this represented the number of Small Business Customers that were eligible for automatic enrollment rather than the number enrolled.

<sup>6</sup> An RCT is an experimental form of impact evaluation design whereby customers are assigned randomly to a treatment group (in this case participate in the pilot by being contacted by Energy Ambassadors), or to a control group. A key strength of an RCT design is that it provides a convincing case for causality: to aid in knowing that what has been achieved is the direct result of the pilot intervention.

<sup>7</sup> RCT was not proposed for SDG&E due to its small number of eligible customers in DAC.

to change the evaluation methodology to use a quasi-experimental design (QED)<sup>8</sup> to evaluate the Pilot. The use of the QED methodology will enable the Utilities to enroll all eligible Small Business Customers in DACs into the Pilot since the QED methodology does not require customers to be withheld from participation to serve as controls to assess the success of the Pilot, unlike the RCT methodology. This proposed change to the evaluation methodology is appropriate given the number of customers eligible to participate in the pilot. This change should not impact the quality of the evaluation outcome in a substantive manner and will allow the Pilot to serve the number of customers contemplated in the implementation plan approved in Advice Letter 4620-E, et al. For these reasons, the Utilities request approval to proceed evaluating the Pilot based in QED methodology.

### **3. Revision to Pilot Timeline**

In Advice Letter 4620-E-A et al., Partial Supplement to Joint Submittal regarding Small Business Customer Outreach Pilot for Disadvantaged Communities, submitted on September 9, 2022, the Utilities presented a revised timeline that extended the time to complete pre-pilot activities, from two months to three months from the approval date of the Advice Letter. Since that submittal, the Utilities have determined that more time is needed to adequately prepare for the Pilot launch. Specifically, the implementer required more time than anticipated to complete pre-launch Pilot setup activities, including the vetting, hiring and training of its subcontractors, and the development and testing of its data processing systems. Moreover, the IT security reviews that the Utilities are required to conduct could not commence until after the implementer's data processing systems were completed. Table 2 below provides the proposed revised timeline for the Pilot. The Utilities respectfully request approval of the proposed schedule below.

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<sup>8</sup> A QED is a form of impact evaluation design whereby customers in the control group are selected among customers who were eligible for the Pilot but chose not to participate. Selection is made using the propensity score matching process that accounts for energy consumption, industry, customer arrearage (such as account balance and length), and participation in other utility programs. If there are not sufficient non-participants who are similar to participants within the pilot-eligible, non-participant population, customers who would have been eligible for the pilot except for their location outside a DAC will be included). The matched non-participant control group will go through a series of validation or attribute comparison steps to ensure the quality of the matching process.

**Table 2: Second Revision to Timeline Proposed in Table 5, AL 4620-E-A et al. for Small Business Customer Outreach Pilot**

<b>Approved Dates</b>	<b>Revised Dates</b>	<b>Activity</b>
October 28, 2021	N/A	Tier 2 Advice Letter is Filed
October 18, 2022	N/A	AL is approved
October 18, 2022 - January 18, 2023 <sup>9</sup>	January 18, 2023 – May 31, 2023	Utilities complete pre-pilot activities to: <ol style="list-style-type: none"> <li>1. Hire third-party implementer (Completed in January 2023)</li> <li>2. Engage third-party evaluator (Completed in January 2023)</li> <li>3. Create customer outreach materials (Completed in March 2023)</li> <li>4. Analyze customer energy usage to identify beneficial rates (Completed in May 2023)</li> </ol>
January 19, 2023 – January 19, 2024 <sup>10</sup>	June 1, 2023 – May 31, 2024	Pilot Implementation
January 20, 2024 – January 20, 2025 <sup>11</sup>	June 1, 2024 – May 31, 2025	Post Pilot Assessment
January 21, 2025 – October 21, 2025 <sup>12</sup>	June 1, 2025 – March 1, 2026	Pilot Evaluation and Final Report

<sup>9</sup> In AL 4620-E-A et al., the Utilities proposed completing pre-pilot activities within three months from the AL approval date.

<sup>10</sup> In AL 4620-E-A et al., the Utilities proposed the pilot implementation to occur within 12 months after completion of pre-pilot activities.

<sup>11</sup> In AL 4620-E-A et al., the Utilities proposed the post pilot assessment to occur within 12 months after completion of pilot implementation.

<sup>12</sup> In AL 4620-E-A et al., the Utilities proposed the pilot evaluation and final report to occur within nine months after completion of the post pilot assessment.

## **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **August 31, 2023**, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

The protest shall also be electronically sent to the IOUs via E-mail at the addresses shown below on the same date it is electronically delivered to the Commission:

For PG&E:

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

For SCE:

Tara S. Kaushik  
Managing Director, Regulatory Relations  
c/o Karyn Gansecki  
Southern California Edison Company  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

For SoCalGas:

Gary Lenart  
Tariff Manager  
Southern California Gas Company  
E-mail: [Glenart@socalgas.com](mailto:Glenart@socalgas.com)  
E-mail: [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

SDG&E:

Greg Anderson  
Regulatory Tariff Manager  
E-mail: [GAnderson@sdge.com](mailto:GAnderson@sdge.com)  
Email: [SDGETariffs@sdge.com](mailto:SDGETariffs@sdge.com)

Any person (including individuals, groups, or organizations) may protest or respond to an Advice Letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the Advice Letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on



which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

**Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.2, this Advice Letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 Advice Letter become effective on regular notice, **September 10, 2023**, which is 30 calendar days from the date of submittal.

**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 GO 96-B service list and the service list for 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:Process_Office@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/>.

FOR PG&E:

\_\_\_\_\_/S/  
Sidney Bob Dietz II  
Director, Regulatory Relations

FOR SCE:

\_\_\_\_\_/S/  
Connor Flanagan  
Managing Director, State Regulatory Operations

FOR SoCalGas:

\_\_\_\_\_/S/  
Gary Lenart  
Tariff Manager

FOR SDG&E:

\_\_\_\_\_/S/  
Greg Anderson  
Regulatory Tariff Manager

cc: R.21-02-014 – Order Instituting Rulemaking to Address Energy Utility Customer  
Bill Debt Accumulated During the COVID-19 Pandemic



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

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

Utility type:

☒ ELC ☒ GAS ☐ WATER  
☐ PLC ☐ HEAT

Contact Person: Michael Finnerty

Phone #: 279-789-6210

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: michael.finnerty@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) #: 4783-G/7002-E et al.

Tier Designation: 2

Subject of AL: Joint Submittal to Update Number of Eligible Pilot Participants and Modify Pilot Timeline and Evaluation Method for the Small Business Customer Outreach Pilot for Disadvantaged Communities

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 #:

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

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

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

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

Resolution required? ☐ Yes ☒ No

Requested effective date: 9/10/23

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

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

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

<sup>1</sup>Discuss in AL if more space is needed.

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

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

Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:

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

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

**Clear Form**

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

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP	Pioneer Community Energy
Alta Power Group, LLC Anderson & Poole	Electrical Power Systems, Inc. Fresno Engineers and Scientists of California	Public Advocates Office
Atlas ReFuel BART	GenOn Energy, Inc. Green Power Institute Hanna & Morton ICF	Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc.
Barkovich & Yap, Inc. Braun Blaising Smith Wynne, P.C. California Community Choice Association California Cotton Ginners & Growers Assn California Energy Commission	iCommLaw International Power Technology Intertie	Resource Innovations
California Hub for Energy Efficiency Financing	Intestate Gas Services, Inc.	SCD Energy Solutions San Diego Gas & Electric Company
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Johnston, Kevin Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	SPURR San Francisco Water Power and Sewer Sempra Utilities
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	Sierra Telephone Company, Inc. Southern California Edison Company Southern California Gas Company Spark Energy Sun Light & Power Sunshine Design Stoel Rives LLP
Chevron Pipeline and Power City of Palo Alto	Modesto Irrigation District NRG Solar	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
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	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
Dept of General Services Don Pickett & Associates, Inc. Douglass & Liddell Downey Brand LLP Dish Wireless L.L.C.		