

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



**Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 7021E
As of November 29, 2023**

Subject: Pacific Gas and Electric Company Adherence to the Approved San Joaquin Valley Disadvantaged Communities Safety Plan

Division Assigned: Energy

Date Filed: 09-11-2023

Date to Calendar: 09-15-2023

Authorizing Documents: D1812015

Disposition:	Accepted
Effective Date:	09-11-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Michael Finnerty

(279) 789-6216

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



September 11, 2023

Advice 7021-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company Adherence to the Approved San Joaquin Valley Disadvantaged Communities Safety Plan

Purpose

In accordance with Ordering Paragraph (OP) 12, Section i. of Decision (D.) 18-12-015 (the Decision), Pacific Gas and Electric Company (PG&E) hereby submits for approval to the California Public Utilities Commission (Commission) this Tier 1 Advice Letter (AL) summarizing its adherence to the approved San Joaquin Valley (SJV) Disadvantaged Communities (DAC) Safety Plan.¹ This informational-only AL describes all health and safety issues encountered, summarizes methods taken to ensure retention of accurate records for purposes of equipment maintenance and warranties, and provides additional information deemed relevant.

Background

In 2015, the Commission initiated a rulemaking order to identify disadvantaged communities in the SJV that were not served by utilities' natural gas lines, and then to evaluate the feasibility of options to improve access to affordable energy in these communities.² In PG&E's service territory, the SJV DAC pilots were designed to replace propane and wood burning appliances with all electric appliances, and ensure that participating customers experience energy cost savings.³

In D.18-12-015, OP 12, Section i. the Commission directed PG&E, Southern California Edison Company, and Southern California Gas Company, and the third-party pilot implementer (PI), to each file a Tier 1 advice letter within 90 days of completion of their

¹ [PG&E Advice Letter 5498-E, PG&E's San Joaquin Valley Disadvantaged Communities Pilot Implementation Plan](#) (At pg. 19, last accessed on August 21, 2023, "Implementation Plan")

² Order Instituting Rulemaking to Identify Disadvantaged Communities in the San Joaquin Valley and Provide Economically Feasible Options for Affordable Energy, R. 15-10-030, p. 2 (April 3, 2015).

³ D.18-12-015, p. 75

authorized pilot project implementation activities to document adherence to their approved Safety Plan.

Of the eight SJV DAC Pilots located within PG&E service territory, PG&E is the program administrator (PA) with a third-party pilot implementer (PI) for three Pilot communities (Allensworth, Cantua Creek, and Seville). A third-party vendor (Richard Heath & Associates, "RHA") is the program administrator/pilot implementer (PA/PI) for the remaining five Pilot communities (Alpaugh, Fairmead, La Vina, Lanare, and Le Grand). Because the third-party PA/PI for those five Pilot communities will be submitting a separate advice letter demonstrating safety plan adherence and results, PG&E does not include any information in this AL on those five communities, as the safety report in this AL is limited to the three communities for which PG&E is the PA. For these three pilot communities, the last SJV appliance installation was completed on June 15, 2023, thus concluding PG&E's pilot project implementation activities. Further details on outreach, installations, and program implementation for these three communities are detailed in PG&E's most recent quarterly report, similar information on the five communities administered by the third-party vendor is also available in their most recent quarterly report.⁴

Discussion

This section details all health and safety issues identified, and documents PG&E's adherence to the SJV DAC Safety Plan.⁵ The safety of the public, employees, and suppliers continues to remain PG&E's highest priority, and safety considerations were made at every point of the customer journey. In PG&E's three pilot communities, there were five instances of health and safety issues identified, which rendered the project infeasible because the identified issues could not be remediated. These instances are detailed in the Health and Safety Issues Identified section below:

Health and Safety Issues Identified

Throughout the assessment and installation phases, there were five homes with health and safety issues that were identified by the third-party PI and were unable to be remediated by the program. These customers were provided with a deferral form from the third-party PA/PI which indicated the respective health and safety issues, along with the required steps that needed to be taken by the customers in order for the program to treat their homes. None of the five customers responded to the third-party PI or attempted to remediate the identified issues to resolution. The following describes the five homes with health and safety issues encountered that were unable to be remediated:

⁴ Richard Heath & Associates, Inc's (U 946 E) San Joaquin Valley Disadvantaged Communities Pilot Quarterly Progress Report, July 31, 2023.

⁵ Implementation Plan, at pg. 19.

- Two Allensworth Residences
 - Issue: Maintenance or housekeeping practices limit access of workers to the dwelling for assessment or installation services.
 - Issue: Evidence of significant infestation of rodents, insects and/or other vermin is present and home has unsafe air quality, and significant animal feces in the home that present a danger to the occupants or workers.

- Two Seville Residences
 - Issue: Home was in significant disrepair, most outlets in home were not working and needed to be rewired. While the customer was applying for the program, there was a fire at the home that caused additional damage, rendering the home unserviceable.
 - Issue: Maintenance or housekeeping practices limit access of workers to the dwelling for assessment or installation services and home has unsafe air quality or other hazards including an unsafe work area, tripping hazards, inaccessible areas for work.

- One Cantua Creek Residence
 - Issue: Maintenance or housekeeping practices limit access of workers to the dwelling for assessment or installation services.

Throughout the outreach, assessment and installations phases, PG&E and the third-party PI developed specific processes to assess homes' condition, identify any safety issues, ensure contractors received training, and provide warranties to customers for installed measures, as detailed below:

Prior to Treatment

Community Energy Navigator (CEN) Outreach and Pre-Installation Inspections

As a result of COVID-19, most customer enrollments were completed over the phone by the CENs, as opposed to the original plan for CENs to complete enrollment paperwork at in-person community events/meetings, or in-person at the customers' homes. The CENs verified customer eligibility, followed by third-party PI on-site assessments for potential safety issues. All of the pre-installation safety inspections were conducted in person.

Lead, Asbestos and Other Hazardous Materials

The third-party PI determined whether the home had any lead, asbestos, or other hazardous materials during the on-site assessment phase. There was no lead, asbestos, and/or other hazardous materials encountered, therefore no homes were remediated or non-feasible due to these reasons.

Treatment

Propane Related Safety

The PI was qualified to work with and around propane appliances. The installation phase concluded with no incidents or safety issues related to propane appliances or equipment.

Contractor Safety and Qualifications

The third-party PI for PG&E's three Pilot communities (Allensworth, Cantua Creek, and Seville), and the PA/PI's contractors and subcontractors, complied with PG&E's Contractor Safety Program.⁶

After Treatment

Inspections

PG&E leveraged its existing Central Inspection Program (CIP) to audit new appliance installations. Any measures that were identified as an issue were resolved by the third-party PI and approved by the CIP representative.

Product Warranty

All installed measures included a 1-year manufacturer's warranty, and an extended 4-year warranty. Upon installation of the measure, warranty information was provided directly to the customer. In addition, the customer received letters detailing how to obtain warranty services and contact information to the PI for any questions or issues related to the appliance warranties. The third-party PI (and/or third-party PI subcontractor/bulk appliance provider) will continue to maintain the customer installation records and warranty information for the duration of the warranty period.

PG&E appreciates the opportunity to document adherence to the SJV DAC Safety Plan pursuant to OP 12, Section i. of D. 18-12-015 after the completion of its installation activities.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **October 2, 2023**, which is 21⁷ days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit

⁶ https://www.pge.com/en_US/for-our-business-partners/purchasing-program/suppliers/suppliers.page (last accessed on August 21, 2023)

⁷ Pursuant to Rule 1.5 of General Order 96-B, PG&E requests to extend the protest period by one additional day because twenty days following submission of this advice letter is Sunday, October 1, 2023.

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

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 5.1, and OP 12 of D.18-12-015, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is **September 11, 2023**.

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. 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 service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to 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
CPUC Communications



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

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

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Michael Finnerty

Phone #: (279) 789-6216

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) #: 7021-E

Tier Designation: 1

Subject of AL: Pacific Gas and Electric Company Adherence to the Approved San Joaquin Valley Disadvantaged Communities Safety Plan

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. 18-12-015

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

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

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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: 9/11/23

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 proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx:
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 Community Choice Association
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
Downey Brand LLP
Dish Wireless L.L.C.

East Bay Community Energy Ellison
Schneider & Harris LLP

Electrical Power Systems, Inc.
Fresno
Engineers and Scientists of California

GenOn Energy, Inc.
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
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