

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 4, 2019

**Advice Letter 3990-G/5329-E and
supplemental Advice Letter Nos.
3990-G-A/5329-E-A and 3990-G-
B/5329-E-B**

To:

Eric Jacobson
Director, Regulatory Relations
c/o Megan Lawson
77 Beale Street, Mail Code B13U
PO Box 770000
San Francisco, CA 94177

Subject: Disposition partially approving Pacific Gas and Electric Company's (PG&E) Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Mid-Cycle Update Advice Letter (AL), 3990-G/5329-E, as supplemented, Pursuant to Decisions (D.)16-11-022 and (D.) 17-12-009.¹

Dear Mr. Jacobson:

Summary

On July 16th, 2018 PG&E filed Advice Letter (AL) 3990-G/5329-E pursuant to Decision (D.) 16-11-022 detailing out the Mid-Cycle update. The AL provides updated budgets, new measures, recalculations of cost-effectiveness and energy savings, leveraging plans and other program elements for the 2018-2020 ESA and CARE program years. On September 14th, 2018 PG&E filed supplemental AL 3990-G-A/5329-E-A to correct errors and submitted a second supplemental AL 3990-G-B/5329-E-B on October 8th, 2018 pursuant to D.18-08-013.

The Energy Division (ED) approves PG&E AL 3990-G/5329-E and supplemental ALs 3990-G-A/5329-E-A and AL 3990-G-B/5329-E-B filed pursuant to authority granted² in D.16-11-022³, in part, with the modifications to home treatment goals, program budgets, program measures, and energy savings targets specified in the Disposition section below, effective today.

Background

On November 21st, 2016, the Commission issued D.16-11-022 which approved PG&E's 2017-2020 ESA and CARE program plans and budgets. On December 14th, 2017, the Commission issued D. 17-12-009 (The Decision), which modified D.16-11-022 and directed the IOUs to file Tier 2 Advice

¹ On December 14, 2017, the Commission issued D.17-12-009 to replace D.16-11-022 in its entirety

² D.16-11-022 p.439, OP 3 and p.441, OP 6.

³ Page number references throughout are to the "Clean Copy" of Decision posted 2/2/2018
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M208/K640/208640753.PDF>

Letters by July 16th, 2018 proposing any Mid-Cycle updates, adjusting budgets, energy savings targets, and other administrative components of the program.⁴

On July 16th, 2018 PG&E filed 3990-G/5329-E in compliance with this directive and subsequently filed supplemental ALs 3990-G/5329-E-A and 3990-G/5329-E-B. On August 6th, 2018 Joint Parties, National Consumer Law Center (NCLC), National Resource Defense Center (NRDC), California Housing Partnership Corporation (CHPC), Association for Energy Affordability (AEA) and Greenlining filed a timely response to the Investor-Owned Utilities' (IOUs)⁵ CARE and ESA Program Mid-Cycle Update Advice Letters. On August 13th, 2018 the IOUs filed replies to the Joint Parties' response.

Response

The Joint Parties' response expressed dissatisfaction with the lack of discussion by the IOUs of deed-restricted multifamily programs and support for Common Area Measures ("CAM"). The Joint Parties acknowledge the decision did not specifically direct the IOUs to include discussion of this activity in the Mid-Cycle Advice Letters but believe the IOUs should have merited some discussion since their budgets in this sector are virtually unspent and, consequently, their savings must be falling far short of target.

PG&E's reply to the Joint Parties' response states "PG&E included all of the required ESA and CARE updates in its Mid-Cycle Advice Letter." PGE's reply also indicates it has been working closely with Multifamily Working Group to obtain stakeholder input on its CAM implementation plan which became effective on March 31st, 2018.

Discussion

Per General Order 96-B section 7.4.1, any person (including individuals, groups, or organizations) may protest or respond to an Advice Letter. Energy Division acknowledges the Joint Parties' response and agrees with both the Joint Parties and PG&E regarding The Decision not specifically directing the IOUs to include discussion of the Multifamily Common Area Initiative in the Mid-Cycle Advice Letter filings. Additionally, the Multifamily Working Group established in the Decision is currently addressing and facilitating this activity. The Multifamily Working Group consists of the Energy Division, IOUs and interested stakeholders who participate in public quarterly and ad-hoc meetings to implement the CAM directives in The Decision.

Disposition

The program updates proposed by PG&E described below are approved, in part, effective today with the below modifications.

A. ESA Energy Savings Targets

The Decision⁶ gave guidance to the IOUs to increase energy savings targets for the ESA Program for 2019 and 2020 by five percent above 2017-2018 targets. PG&E Resolution G-3531⁷ adopted ESA

⁴ D.16-11-022 p.31

⁵ Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas and Electric Company

⁶ D.16-11-022 p.441, OP 6

⁷ Resolution G-3231 p. 18

savings targets in conformance with Decision directives. Subsequently, Energy Division (ED) directed the IOUs to incorporate the preliminary results of the 2015-2016 ESA Impact Evaluation in this Mid-Cycle update.⁸ PG&E requests adjustments to ESA 2019 and 2020 energy savings targets, based on the updated savings values in the preliminary results of the 2015-2016 ESA Impact Evaluation and PG&E’s updated ESA LED workpaper.

These energy savings targets can be adjusted during the 2018 Mid-Cycle update process, and the Energy Division has delegated authority to adjust (either up or down) energy savings targets up to 5% based on information submitted during the Mid-Cycle update.⁹ The Decision directed Energy Division to employ its impact evaluation support to coordinate with its Mid-Cycle update review, so that any changes to the 5% energy savings target increase will be based on impact evaluation data. Impact evaluations are the key source for accurately accounting the impact of the interventions and tracking progress against savings goals.¹⁰ Accordingly, we increase PG&E’s previously adopted annual electric energy savings targets by 5% and decrease the gas savings by 5% as outlined below in Table 1. These targets are considered minimum thresholds, therefore we expect PG&E to achieve the highest energy savings possible.

Table 1
ESA Portfolio-Wide Savings Targets^{11,12}

Program Year	Adopted Resolution G-3531 (GWh)	Proposed AL 3990-G/5329-E (GWh)	Adopted AL 3990-G/5329-E (GWh)	Adopted Resolution G-3531 (MM Therms)	AL 3990-G/5329-E (MM Therms)	Adopted AL 3990-G/5329-E (MM Therms)
2018	47	84	49.35	2	1.8	1.9
2019	49.35	102	51.82	2.1	(.37)	1.9
2020	49.35	104	51.82	2.1	(.37)	1.9

B. New ESA Measures and Refinements to Existing Measures

1. Proposed New ESA Measures

PG&E requests approval to add the measures below to its ESA portfolio.

a) Heat Pump Water Heater and Central Heat Pump Replacement

PG&E proposes to adopt the Heat Pump Water Heater Replacement measure into the ESA Program as adopted by San Diego Gas & Electric (SDG&E) and Central Heat Pump Replacement measure to as

⁸ 2015-2016 ESA Impact Evaluation, Phase 1 Results. DNV-GL (June 6th, 2018)

⁹ D.16-11-022 p.50

¹⁰ D.16-11-022 p. 222

¹¹ The preliminary results of the 2015-2016 ESA impact evaluation show an average of 133 kWh per home, a 63 percent reduction from 2017; and an average of 8 Therms per home, a 68 percent reduction from 2017 for PG&E territory. The preliminary results of the 2015-2016 Impact Evaluation do not include LED lighting savings because LEDs were introduced to the ESA Program in 2017; as a result, PG&E is forecasting savings for LEDs based on its workpaper.

¹² For proposed new measures, PG&E has included additional savings forecasts based on the preliminary results of the 2015-2016 Impact Evaluation. When savings values from the preliminary results of the 2015-2016 Impact Evaluation were not statistically significant, PG&E substituted with approved PG&E workpapers from the CPUC Dispositions and Workpapers archive <http://deeresources.net/workpapers>.

adopted by Southern California Edison (SCE).¹³ Adding these technologies will expand the opportunity for low-income customers to improve the efficiency of their hot water heating and HVAC systems, thereby lowering energy bills and improving health and comfort. Cost effectiveness tests used in ESA programs are ESA Cost Effectiveness Test (ESACET) and Resource Measure Total Resources Cost (Resource TRC). Resource TRC¹⁴ for these measures are 0.53 and 0.83 respectively. We approve addition of these measures in PG&E's service territories consistent with similar measures offerings SDG&E's and SCE's services areas.

b) High Efficiency (HE) Furnace Replacement

PG&E did not originally propose to add this measure in its prior conforming Advice Letter filing.¹⁵ However, PG&E has reconsidered its position regarding this measure and now proposes to adopt it as provided by Southern California Gas Company (SoCalGas) because it is more cost-effective when compared to existing units.

In compliance with D.16-11-022 OP 16¹⁶, PG&E performed the Energy Savings Assistance Cost Effectiveness Test (ESACET) and Resource TRC using the Annual Fuel Utilization Efficiency (AFUE) baseline used by SoCalGas and SCE to determine if the HE Furnace proves more cost effective as compared to the existing Forced Air Unit furnace it currently offers. PG&E used the above-code baseline of 80% AFUE in the existing PG&E work paper for the HE furnace (PGECOHC145 Revision 3, which is also in the Southern California Gas Company work paper for HE furnaces). PG&E was not able to perform the cost-effectiveness tests using 65% AFUE as there are no existing energy savings values in DEER for a baseline 65% AFUE furnace. PG&E's updated HE Furnace measure cost effectiveness is based on the following assumptions: 75% of the furnaces replaced would qualify for HE Furnaces at an installed cost of \$4,600, including cost of unit, labor, and other installation overhead.

The HE Furnace ESACET ranged from 0.13 in 2017 to 0.17 in 2020¹⁷, and Resource TRC ranged from 0.05 in 2017 to 0.07 in 2020. The existing furnace replacement measure achieved a Resource TRC of 0.02 in 2017 and an ESACET of 0.15. Given the HE Furnace Replacement measure is more cost-effective than the existing Furnace Replacement measure, PG&E now proposes to adopt the HE Furnace replacement measure as adopted by SoCalGas. Despite the overall low cost effectiveness results, we approve HE Furnaces due to increased cost effectiveness and to mitigate potential health, comfort and safety issues in PG&E's service area.

In addition, PG&E proposes a change to the gas usage requirement, from high energy gas users defined as gas usage above 400 Therms in the winter season to 200 percent or above gas baseline. PG&E requests this adjustment to the household qualification criteria to ensure a streamlined program design that efficiently targets and enrolls high energy users.¹⁸ PG&E also proposes to distinguish eligibility

¹³ D.16-11-022 OP 21

¹⁴ Resource TRC test includes the avoided cost benefits and the installation costs for the resource measures. The non-energy benefits and administrative costs are not included in the Resource TRC test.

¹⁵ D.16-11-022 p. 104 and PG&E Conforming Advice Letter 38/30-G/5043-E (April 3, 2017) p. 13 and Attachment ESA-9.

¹⁶ If the score is higher than the lower efficiency furnaces that the Energy Savings Assistance (ESA) Program currently provides, PG&E and SDG&E must provide this measure instead of the standard furnaces. If it is determined that the measure is cost effective, PG&E and SDG&E must propose to add this measure mid-cycle, along with cost-effectiveness documentation and a budget proposal, via the mid-cycle update Advice Letter.

¹⁷ PG&E Conforming Advice Letter 3830-G/5043-E (April 3rd, 2017), p.13 and Attachment ESA-9.

¹⁸ PG&E Advice Letter 3990-G-A/5329-E-A

for HE Furnace Replacement based on customer tenancy which would allow customers who are renters to be eligible for the HE Furnace in the early retirement scenario, but not eligible to receive HE Furnace in the instances where the measure needs to be replaced on burnout. PG&E maintains the position that it is the responsibility of the landlord to ensure a safe and operable furnace for their tenants. We agree the landlord should cover replacement on burnout, and not the IOU. Regarding expansion of this measure to renters in instances of early retirement and updating the gas usage requirement (from above 400 Therms in the winter season to 200 percent or above gas baseline) we deny these requests and retain existing requirements for both high energy gas users and renters. These requests may be revisited for during the next program cycle.

c) Smart Thermostat Replacement

PG&E proposes to adopt the Smart Thermostat measure to enable low-income customers to have better control over their energy use, thereby lowering energy bills and improving health and comfort. Furthermore, this measure aligns with the California State Assembly Bill (AB) 793 which directs the IOUs to incorporate energy management technologies into their ESA Program offerings.¹⁹ The Resource TRC for this measure is 1.96. PG&E proposes targeting the measure to climate zones 11, 12, 13 and 14 in accordance with the its coordinated HVAC strategy and a phased release of the measure, first prioritizing installation to customers with broadband internet access who are most likely to have a positive experience with the Smart Thermostat. PG&E also plans to evaluate how to best expand the measure to customers without broadband access.

While we support PG&E's phased release for Smart Thermostat, we approve this measure for all climate zones through program year 2020. PG&E's authorized Smart Thermostat pilot²⁰ is currently running and is intended to determine whether Smart Thermostats are a helpful energy management tool for low-income customers to support their transition to TOU rate plans, as well as evaluate if connected technology can assist low-income customers in lowering high air conditioner-driven electric energy usage. Based on the evaluation results of the pilot, should it be found the measure savings for low income population are not realized, this measure will not be offered post 2020.

d) Blower Motor Retrofit (BPM)

PG&E proposes to adopt the Blower Motor Retrofit measure (also known as the Brushless Permanent Magnet or BPM) in its ESA Program. PG&E currently offers this measure to customers participating in its Residential Energy Efficiency AC Quality Care Program (also known as the Residential HVAC Quality Maintenance Program). Residential central air conditioners and heat pumps typically contain a blower motor that moves conditioned air through the ductwork. PG&E asserts the Blower Motor Retrofit improves the efficiency of the motor,²¹ generating energy savings and subsequently bill savings. Additionally, the measure provides non-energy benefits in the form of increased comfort and reduced noise.²² PG&E will use the Residential HVAC Quality Maintenance work paper PGECOHV139 Revision 6 to support savings claims until an impact evaluation can be conducted to

¹⁹ Disposition approving Pacific Gas and Electric's Advice Letter 3843-G/5075-E and Southern California Edison's Advice Letter 3605-E to comply with Resolution E-4820 to promote Energy Management Technologies for residential and small and medium business customers.

²⁰ Smart Thermostat pilot approved in PGE& filed AL 5242-E

²¹ Energy Savings Potential and Opportunities for High-Efficiency Electric Motors in Residential and Commercial Equipment, U.S. Department of Energy Office of Energy Efficiency and Renewable Energy, December 2013.

<https://www.energy.gov/sites/prod/files/2014/02/f8/Motor%20Energy%20Savings%20Potentia%20Report%202013-12-4.pdf>

²² Noise reduction is not currently included as a non-energy benefit in the Low Income Public Participation Test (LIPPT).

create a specific claim for the ESA Program. To qualify for the measure, a household must have a central AC, central heat pump, central furnace or package unit (a combined central AC and furnace). PG&E proposes targeting the measure to climate zones 11, 12, 13 and 14 in accordance with its Coordinated HVAC Strategy. The TRC for this measure is 0.4. To complement existing HVAC offerings and to mitigate potential health, comfort and safety issues, we approve this request through 2020.

e) Variable Speed Pool Pump and Pool Pump Motor Replacement

PG&E proposes to adopt the Variable Speed Pool Pump replacement measure (Pool Pump) as adopted by SCE, for the early retirement of inefficient pool pumps. PG&E found approximately 10 percent of ESA eligible customers in PG&E territory have a pool based on a survey of available customer data. PG&E seeks to adopt this measure for ESA customers given the high impact: high energy savings of the measure and its potential to reduce customer bills. PG&E proposes to make the measure available in all climate zones to single family dwellings and recommends renter eligibility for this measure. PG&E estimates up to 6,600 customers will be eligible and qualified to receive this measure annually for program years 2019 and 2020.

During our review and analysis, we found a significant cost differential when comparing PG&E’s forecasted expenses to SCE’s prior and current expenses of pool pumps/motors as reflected below in Table 1A.

**Table 1A
Pool Pump Measure Comparison²³**

Variable Speed Pool Pump/Motor Replacement	Quantity Installed	Expenses	Average Cost per Household
SCE PY 17 (Actual)	2,179	\$2,670,367	\$1,225
SCE PY 18 (YTD-Actual)	1,423	\$1,677,987	\$1,196
PG&E PY 19 (Forecasted)	5,704	\$27,720,220	\$4,858
PG&E PY 20 (Forecasted)	5,824	\$28,306,264	\$4,860

PG&E’s budget request for approximately \$56M for pool pumps is not adequately justified and is therefore denied. If PG&E is still interested in pursuing this measure, it shall do so via Tier 2 Advice Letter providing adequate justification and accurate cost analysis within 30 days of this disposition.

2. Proposed Refinements to Existing Measures

a) Room AC Replacements

²³ Sources: SCE 2017 CARE ESA Annual Report, SCE CARE ESA Monthly Report (Through November 2018), and PGE Mid-Cycle Advice Letter ESA Table 2 - Measure Installations and Savings Summary: Total First Touch and Re-Treated Homes

Room AC Replacements, identified in the California Installation Standards Manual as Window and Wall AC Replacements, performed poorly in the preliminary results of the 2015-2016 ESA Impact Evaluation across all electric IOU territories with an average savings of -123 kWh²⁴ across PG&E climate zones. PG&E recommends keeping the measure in the program and extending it to climate zones 11 and 12 to address the LINA Study finding of a customer need for cooling measures as well as to address customer health, comfort and safety in climate zones with high cooling degree days. Energy Division approves retaining room AC replacement and supports expanding the offering to climate zones 11 and 12 through PY 2020 to mitigate potential health comfort and safety issues in these areas. PG&E shall reevaluate this measure as savings information is updated through Phase 2 of the 2015-2016 ESA Impact Evaluation. PG&E may revisit this refinement in preparation for the next program cycle.

b) Efficient Fan Controllers

Efficient Fan Controllers²⁵, performed poorly in the preliminary results of the 2015-2016 ESA Impact Evaluation with an average savings of -51 kWh and 2 Therms across PG&E climate zones and housing types. PG&E requests to expand the measure to include gas customers in all climate zones to address heating needs and restrict this measure to electric customers residing in climate zones 11, 12, 13 and 14 to address cooling needs and improve electric savings to the customer. In addition, these measure changes will provide bill and energy savings for eligible customers. For this measure, PG&E shall retain existing eligible climate zones and not eliminate any climate zones. PG&E may revisit further refinement in preparation for the next program cycle.

c) Central AC Replacement, Evaporative Coolers and Central AC Tune-ups

PG&E recommends expanding customer eligibility for Central AC Replacements to climate zones 11 and 12 and request to focus Evaporative Coolers and Central AC Tune Ups in inland climate zones 11,12,13 and 14 to address the LINA Study finding of a customer need for cooling measures as well as to address customer health, comfort and safety in climate zones with high cooling degree days. In addition, these measures will provide bill and energy savings for eligible customers. We approve expanding Central AC Replacements to climate zones 11 and 12 through PY 2020 to mitigate potential health comfort and safety issues in these areas. Regarding Evaporative Coolers and Central AC Tune Ups, PG&E shall also retain existing eligible climate zones and not restrict or eliminate any climate zones for these measures. PG&E may revisit further refinement in preparation for the next program cycle.

3. Proposed Measure Retirement

PG&E requests the removal of microwaves from the ESA portfolio. Microwaves performed poorly in the preliminary results of the 2015- 2016 ESA Impact Evaluation for both PG&E and SDG&E with an average -81 kWh and -1 Therm across housing types. A negative value for kWh and Therms translates to an increase in energy use to the customer which equates to a higher bill. Since the intent of this measure is to reduce a customer's energy burden, PG&E requests to remove this measure. Furthermore, PG&E finds the high installation rate of microwaves at odds with the known penetration rate of 93

²⁴ A negative savings value denotes an increase in energy usage.

²⁵ This measure misidentified name in the Policies and Procedures Manual as "AC Time Delay". "AC Time Delay" is the colloquial terminology used in the program, but the correct terminology for this measure is the "Efficient Fan Controller" or as it is named in the California Installation Standards Manual "Smart Fan Delay". PG&E requests the change in nomenclature in the Appendix B to eliminate further confusion.

percent for microwaves in its territory from the 2009 Residential Appliance Saturation Study.²⁶ We approve this request.

PG&E shall continue monitor the effectiveness of its entire measure portfolio to determine which measured should continue to be offered and/or retired moving forward.

4. Other requested changes to program policy

PG&E requests that the Minor Home Repair cap be increased from \$750 to \$1,000 per ESA 2020 household.²⁷ This increase to \$1,000 for ESA 2020 customers aligns with two important program trends noted by PG&E. First, the cap has not increased since 2013; PG&E believes that the cap should increase to align with inflation and general increase in labor and material costs. Second, PG&E has recently noted that low income households may have additional barriers to program participation that can include 1) older equipment that requires higher cost minor home repair to enable installation of energy efficiency measures or 2) an increased number of repairs required to ensure the home receives all feasible measures. For example, PG&E and installation contractors have noted that in some cases the minor home repair cap has prevented the installation of window glass replacement, which can be costly. We approve this request and apply it statewide for all eligible treated households including both ESA 2020 and Go-Backs.

C. ESA Penetration Goals

PG&E requests to update its 2020 penetration goals to remaining homes to treat using updated 2018 Athens Research (Athens) estimated eligibility numbers, adding in 2017 ESA and CSD Treated Homes, and applying the Commission-authorized Willing and Feasible to Participate factors. PG&E has updated its estimate of ESA customers remaining to be treated by 2020, using the new 2018 Athens estimate of eligible households, submitted February 9th, 2018. PG&E also subtracted the 51,442 First Touch ESA homes treated by PG&E in 2017 and the 6,328 PG&E homes treated by CSD's LIHEAP in 2017 before applying the approved Commission methodology to determine the number of willing and eligible homes remaining. Using this methodology PG&E estimates there are 95,914 willing and eligible PG&E homes remaining to be treated by ESA in 2018 through 2020 and requests to update its 2020 penetration goals to 95,914.

We find use of the latest Athens data reasonable as we approach the 2020 statutory deadline²⁸ and make additional refinements to PG&E's First-Time treatment for statewide consistency and in alignment with the methodology outlined in The Decision²⁹ as shown below in Table 2. As a result of our adjustment, the number of PG&E's First-Time treatment households increased by approximately 10% to allow eligible and willing low-income households an opportunity to participate in the ESA program.

²⁶ <https://www.energy.ca.gov/2010publications/CEC-200-2010-004/CEC-200-2010-004-ES.PDF>

²⁷ The MCWG has recommended that the Minor Home Repair cap be increased from \$750 to \$1,000 and that the average Minor Home Repair cap be increased from \$300 to \$500 for all households, including ESA 2020 and Go Backs.

²⁸ Public Utilities Code Section 382 (e) The Commission shall by no later than December 31st, 2020 ensure that all eligible low-income electricity and gas customers are given the opportunity to participate in low income energy efficiency programs.

²⁹ D.16-11-022 p.271

**Table 2
PG&E ESA Penetration Goals**

1.	1,689,907	Estimated ESA Program eligible customers for 2018 (filed 2/9/2018)
2.	1,741,112	Estimated eligible customers for 2020 (escalated by 1 percent per year)
3.	1,292,580	Customers served by ESA Program 2002 through 2017
4.	51,442	Customers served by ESA Program in 2017
5.	188,008	Customers served by LIHEAP 2002-2017
6.	35,542	Customers projected to be served by LIHEAP in 2018 – 2020
7.	31,988	Customers projected to be served by LIHEAP in 2018 – 2020 (90% annual achievement)
8.	177,094	Subtract:#2–#3–#4–#5, –#7: Remaining Untreated Customers (or "Adjusted Eligibility") used for calculating the 2018-2020 programmatic initiative
9.	106,257	Remaining Eligible Customers: 60% of Untreated Customers are Willing and Feasible To Participate

PG&E does not intend to decrease the overall number of homes it will treat per year. PG&E will continue to treat the same total number of ESA customers per year, as authorized in the Application Decision. Updating the 2018-2020 First Time treatment goal will shift the ratio of First Touch and Go Back customers that will be treated per year. The number of Go Back customers that may be treated each year will increase as the number of remaining willing and feasible First Touch customers decreases.

PG&E’s total proposed and authorized homes treated projections for 2018-2020 are provided below in Table 3. The authorized total First Time treatments represents an increase of 10,343 households above PG&E’s First Time treatments proposed in its AL. These additional treatments are evenly split, adding 5,172 homes per year in 2019 and 2020. We also modified PG&E’s retreatment projections to offset the increase in First Time treatments.

Table 3
2018-2020 Household Treatment Goals

	Proposed³⁰				Authorized			
	2018	2019	2020	Total	2018	2019	2020	Total
First-time Treatment	31,971	31,971	31,971	95,913	31,971	37,143	37,143	106,257
Retreatment	62,561	67,287	72,250	202,098	62,561	62,115	67,078	191,754
Total Households Treated	94,532	99,258	104,221	298,011	94,532	99,258	104,221	298,011

D. Update ESA cost-effectiveness test results consistent with Cost Effectiveness Working Group recommendations:

PG&E provides updated cost effectiveness tests, incorporating Cost Effectiveness Working Group recommendations, and using the updated savings values in the preliminary results of the 2015-2016 ESA Impact Evaluation. As directed by the Energy Division, PG&E used the phase 1 estimates for cost effectiveness testing for all measures that were also part of the ESA Program portfolio in 2015 to 2016. For new measures added to the program in this current program cycle, PG&E used estimates from utility workpapers. We accept PG&E’s updated ESA Program Cost Effectiveness calculations shown below in Table 4 which continue to be used for information purposes only.

Table 4
PG&E ESA Cost Effectiveness

Program Year	Ratio of Benefits Over Costs	
	ESACET	Resource TRC
2018	1.10	.98
2019	.75	.62
2020	.80	.64

E. Describe expanded water leveraging plans:

The Decision directs the utilities to describe new leveraging plans with identified water wholesalers and retailers operating in their service territories and proposals for additional cold-water measures.³¹ On March 23rd, 2018, PG&E hosted a water-energy forum to discuss water-energy partnership opportunities (i.e. that partnering water agencies could leverage PG&E’s ESA presence in their customer homes to provide minor water services and installations to shared low income customers) and assess interest of water agencies to collaborate with PG&E to enhance water conservation efforts

³⁰ Retreatment values are estimated based on proposed First- Time treatments in PG&E AL 3990-G-A/5329-E-A p.20

³¹ D.16-11-022 at p.460, OP 59

for low-income customers. During the forum, PG&E described its previous 2016-2017 water leveraging initiative with California American Water and Solano County Water Agency, providing services and water conservation resources.

Sixteen agencies participated in the Water-Energy Forum Webinar, and PG&E is working with 15 agencies that expressed interest in partnering with PG&E to provide water conservation services to shared low-income customer households. PG&E proposes to expand leveraging partnerships with water agencies through ESA Water Coordination Partnerships and to offer a menu of five water conservation services and three cold water conservation measures to low income customers it shares with partner water agencies further outlined below in Table 5.

**Table 5
Proposed ESA Water Coordination Measures and Services**

Service / Measure	Assessment	Education	Installation	Referral
Services				
Toilet Dye Tab Test	X			
Outdoor Assessment	X			
Meter Check and Leak Isolation	X			
Water Agency Supplied Education & Distribution of Agency Materials		X		
Referral to Water Agency for Rebate Program or Other Service				X
Measures				
HE Toilet			X	
Dual Flush Converter	X		X	
Shower Timer			X	
Faucet Aerators *	X		X	
Low Flow Showerhead *	X		X	
Thermostatic Shower or Tub Valve *	X		X	

* When water heating fuel is not provided by PG&E, making measure unavailable through ESA.

Each partner agency pre-selects the specific ESA Water Coordination measures and service options they wish to fund. PG&E's updated water leveraging plan is compliant with the Decision and shall continue as directed.

F. Describe tribal penetration and consultation plans:

The Decision³² directs the utilities to conduct a preliminary tribal consultation with all federally recognized tribal communities by 2020 and be prepared to update ESA penetration levels to reflect any issues arising from the tribal consultation, including addressing updates, during its Mid-Cycle update.

PG&E indicates, 49.7 percent of the estimated number of ESA-eligible customers living on tribal lands in PG&E's service area have been treated from ESA Program inception and through November of 2017.

³² D.16-11-022 at p.467, OP 79.

PG&E also describes its prioritization efforts in 2017 and 2018 resulted in PG&E focusing on the following 11 tribes in ranked order of the approximate total of 52 tribes with lands held in trust:

1. Yurok Reservation
2. Laytonville Rancheria
3. Sherwood Valley Rancheria and Trust
4. Hoopa Valley Reservation
5. Pinoleville Rancheria
6. Round Valley Reservation and Trust
7. Grindstone Rancheria
8. Robinson Rancheria and Trust
9. Hopland Rancheria and Trust
10. Chicken Ranch Rancheria and Trust
11. Upper Lake Rancheria

PG&E selected the above eleven tribes due to the natural break in the ranking between these tribes and others, when considering areas with the highest poverty and lowest penetration levels. PG&E is evaluating existing relationships that ESA contractors have with the 11 priority tribes. PG&E is specifically inquiring as to what barriers exist to participate in ESA. As PG&E begins to understand the level of knowledge, historic engagement and needs of the tribal communities, either through existing PG&E contacts or through trusted intermediaries, PG&E will update its approach to serving tribal communities. PG&E's Tribal consultation plan is compliant with the Decision.

G. Describe California State Department of Community Services and Development coordination, including referrals, data sharing, and Low Income Weatherization Program leveraging:

The Decision directed the utilities to file plans outlining the parameters of a data sharing plan in their Mid-Cycle Advice Letters. For this purpose, the IOUs and the Department of Community Services and Development (CSD) shall facilitate data exchange through the Energy Data Request Portal or other procedures deemed mutually appropriate to CSD and each respective IOU.³³ PG&E and the other IOUs continue to meet with CSD to discuss data sharing, leveraging CSD's Low Income Weatherization Program (LIWP) for multifamily properties, and other opportunities. The IOUs and CSD will continue to meet regularly for implementing directives from the Decision to develop standards that clearly define the rules and funding requirements for leveraging ESA Program funds with the LIWP for Multifamily. PG&E updated its penetration goals in its Conforming Advice Letter 3830-G/5043-E (April 3rd, 2017) in compliance with D.16-11- 022, COL 122. They are updated herein using updated 2018 Athens estimated eligibility numbers, 2017 ESA and CSD treated homes, and applying the Commission-authorized Willing and Feasible to Participate factors.

PG&E describes its coordinated CSD Weatherization Assistance Program referral process for customers with high energy burden and non-IOU fuels. PG&E is providing CSD access to customer-specific usage data for CSD-treated households and requests an additional \$500,000 for Information Technology work related to the LIWP leveraging activities. PG&E's data sharing LIWP leveraging efforts with CSD are compliant with the decision and shall continue as directed.

H. Proposed edits to the Statewide ESA Policy and Procedures Manual

³³D.16-11-022 p.488, OP 144 and p.437, Finding of Fact (FOF) 184.

PG&E proposes edits to the ESA Statewide Policy and Procedures Manual consistent with its ESA proposals in its AL. These edits include changes to the Eligible ESA Measures listed in Table 5-1, the Minor Home Repair cost cap for ESA 2020 homes, and Section 8.4.3 (Post Installation Inspection Frequency) to provide the option for inspection from a local jurisdiction (city or county) on attic insulations to qualify as inspection towards the mandatory goal. We approve PG&E's edits to the Statewide ESA Policy and Procedure Manual except where we've denied specific program measure updates herein.

I. Request budget for the Statewide End-Use Load Profile vendor and internal Information Technology (IT) start-up costs:

The electric IOUs were ordered to jointly issue a statewide Request for Proposal (RFP) by March 31st, 2018, to procure a remote disaggregation/non-intrusive load monitoring vendor that will provide the IOUs the ability to generate electric end-use profiles for their CARE and ESA-eligible population. On March 30th, 2018, the IOUs issued the RFP to seek the vendor tasked with creating the individual CARE customer reports that disaggregate household usage by end use.

To implement the requirements in the RFP the Decision directs the IOUs to submit a budget proposal for these efforts which are to be funded out of the CARE Program and ESA Program Regulatory Compliance budgets as follows: PG&E - 43.7%; SCE - 46%; and SDG&E -10.3%.³⁴

PG&E estimates \$1M to fund its share of Statewide End-Use Load Profile Vendor out of the CARE and ESA Programs. To align IOU budgets with the vendor cost split in the Decision and accommodate this work, estimated at \$2.2M, PG&E is authorized a budget not to exceed \$961,400. This amount is to be drawn evenly from ESA and CARE budgets, \$480,700 per program. PG&E may also request modification to the total vendor cost if the estimated total vendor cost of \$2.2M is adjusted by a Tier 2 Advice Letter within 30 days of this disposition.

PG&E also estimates \$2M, \$1M for CARE and \$1M for ESA, will be needed for associated internal IT start-up costs. PG&E does not request additional CARE budget for this work as the current total authorized CARE budget is sufficient. PG&E is able to shift needed funds from the CARE Outreach budget category to CARE Regulatory Compliance budget category. For ESA, PG&E may use remaining 2009 through 2016 unspent funding, allocated to the Regulatory Compliance budget category as specified above to cover these costs. These requests are approved.

J. Data sharing plans with the California LifeLine administrator to Generate Leads Between LifeLine and the CARE and ESA programs

PG&E, in coordination with CPUC Communications Division staff, has agreed to a data sharing plan to generate leads for enrollment purposes between LifeLine and the CARE and ESA programs in compliance with the Application Decision. PG&E will share data with the CPUC Communications Division twice a year or biannually on January 15th and July 15th. The first data sharing occurrence will be on January 15th, 2019.

The data exchange will be facilitated via CPUC Secure File Transfer Protocol (FTP). Communications Division staff will establish a secure folder for the IOUs to upload the data in Excel or .csv format. The file will be marked confidential and will be accompanied by the required confidential affidavit. Each data file shared will include total CARE participants as of December 31st for the January file, and June

³⁴ D.16-11-022 at p.473 OP 97

30th for the July file. Prior to sharing any confidential data, PG&E will perform its own cybersecurity screening if deemed necessary by the company. Any additional leveraging efforts and data information sharing between the LifeLine Administrator and PG&E will be reserved for discussion in future meetings. PG&E's Lifeline data-sharing plan is compliant with the Decision.

K. Address the merit of adding common area meters of deed-restricted multifamily properties to the CARE rate under modifications to the CARE Expansion Program

The Decision³⁵ required the Multifamily Working Group (MFWG) to assess whether the common area meters of deed-restricted properties should be granted access to the CARE rate. PG&E does not recommend adding common area meters for multifamily deed restricted properties to the CARE Expansion Program at this time. We support PG&E's recommendation not to include deed restricted multifamily properties on the CARE expansion program at this time. We agree with the Multifamily Working Group (MFWG) that is premature to propose expanding eligibility for this initiative and understand the MFWG will continue to facilitate discussions regarding this topic to the extent MFWG members or other parties are interested in pursuing further.

L. Address the necessity of changing the CARE Green Tariff Shared Renewables

PG&E does not recommend any changes to the CARE Green Tariff Shared Renewables as PG&E has already met its 30 percent discount threshold goal. We support PG&E's recommendation for no changes at this time as it aligns with Decision directives.

M. Propose modifications to authorized budgets

PG&E's budget, outlined below in Table 6, has been adjusted to align with modifications adopted in this disposition for ESA. PG&E's requests to shift and use unallocated 2009-2016 ESA Unspent Funds to cover a) updated forecasts and assumptions, b) addition of new measures, and c) the refinement of existing measures is approved.

Additionally, as outlined above in section 1e, PG&E may submit a Tier 2 Advice Letter providing adequate justification and accurate cost analysis if it is still interested in pursuing pool pumps as an ESA measure within 30 days of this disposition. PG&E also initially estimated an unspent fund balance of approximately \$1.5M which it requested to refund to rate payers.³⁶ We authorize PG&E to utilize these funds as necessary to accommodate the 10% increase in First Time treatments discussed in section C.

Otherwise pursuant to D.16-11-022³⁷, all current 2009-2016 accumulated ESA carry-over funds, totaling approximately \$56M, shall be utilized to offset collections that would have otherwise been required in this program cycle. These funds shall not be returned to ratepayers, unless directed by the Commission.

³⁵ D.16-11-022 p. 461, OP 62.

³⁶ PG&E Supplemental Advice Letter 3990-G-A/5329-E-A, September 14, 2018

³⁷ D.16-11-022 OP 137

**Table 6
PG&E ESA Authorized 2017-2020 Budget**

	2017	2018	2019	2020	2017-2020
Approved via Resolution G-3531	\$185,083,407	\$195,648,098	\$200,395,633	\$209,612,246	\$790,739,384
Proposed via AL 3990-G/5329-E-A	\$125,150,663	\$161,469,746	\$258,759,947	\$270,648,450	\$816,028,806
Approved via Non Standard Disposition AL3990-G/5329-E-A	\$125,150,663	\$161,469,746	\$231,780,077	\$243,082,536	\$761,483,022

N. Proposed Changes to the ESA electric/gas revenue allocation:

PG&E requests to change its ESA electric/gas revenue allocation split for PYs 2018-2020. For 2018, PG&E’s allocation will change from 52 percent electric/48 percent gas to 58 percent electric/42 percent gas; and for 2019 and 2020, PG&E’s allocation will change from 52 percent electric/48 percent gas to 69.5 percent electric/30.5 percent gas. This request approved however we reserve the right to revisit if issues arise as a result of these modified allocations.

O. Family Electric Rate Assistance (FERA) Program

October 8th, 2018 PG&E filed a second supplemental AL 3990-G-B/5329-E-B pursuant to PG&E’s 2017 General Rate Case Phase 2 Proceeding Decision, D.18-08-013, issued on August 17th, 2018. PG&E’s second supplemental to PG&E’s AL 3990-G/5329-E addresses PG&E’s “Marketing and Outreach (M&O) Plan for Family Electric Rate Assistance (FERA) Program.” The M&O Plan details PG&E’s proposals for using available marketing funds allocated to the CARE program to increase FERA enrollment. PG&E’s supplemental Advice Letter supersedes AL 3390-G-A/5329-E-A in part by adding the M&O Plan for the FERA Program and the remaining revisions contained in AL 3390-G-A/5329-E-A remain unchanged.

In D.18-08-013, the CPUC ordered PG&E to make significant efforts to increase FERA enrollment over the next six years, from 2018 – 2023, with the goal of achieving a 50 percent FERA program subscription level.³⁸ The CPUC also directed PG&E to file an amendment to its July 16th, 2018, ESA/CARE Mid-Cycle Update within 60 days of the effective date of that Decision. In compliance with that Decision, PG&E’s plans to use previously authorized CARE marketing funds on additional marketing and outreach efforts³⁹ in 2018 through 2020 to increase FERA enrollment.

PG&E does not request additional budget authorization in this AL. The proposed budget for incremental CARE/FERA marketing and outreach efforts included in the M&O Plan (Table 8 below) will use funds from the authorized overall CARE marketing budget from 2018 – 2020 (Table 7 below):

³⁸ D. 18-08-013, pp. 74-76, 181 OP 15.

³⁹ D. 18-08-013, pp. 75-76, 181-182 OP 16.

Table 7
CARE PY 2018 – 2020 Overall Marketing Budget⁴⁰

2018	2019	2020
\$9,558,816	\$9,301,337	\$9,628,265

Table 8
Proposed Budget for Incremental CARE/FERA-Targeted Joint M&O Efforts,⁴¹
Using Previously-Approved CARE Marketing Funds

2018	2019	2020	Total
\$129,200	\$1,083,300	\$811,100	\$2,023,600

PG&E will include a longer term FERA specific M&O proposal and budget in its upcoming low-income program application, to be filed June 1st, 2019.⁴² Consistent with D. 18-08-013, PG&E will report to Energy Division on its progress toward increasing FERA enrollment by filing information-only AL a at the end of 2018,2019, 2020, 2021, 2022 and 2023.⁴³

PG&E’s plan to use previously authorized CARE marketing funds on additional marketing and outreach efforts in 2018 through 2020 to increase FERA enrollment is approved.

Please contact Syreeta Gibbs in the Energy Division at (415) 703-1622 or at syreeta.gibbs@cpuc.ca.gov if you have any questions.

Sincerely,

Edward Randolph
 Director, Energy Division
 California Public Utilities Commission

- cc: Charlie Harak, NCLC
 Maria Stamas, NRDC
 Isaac Sevier, NRDC
 Stephanie Wang, CHPC
 Carmelita Miller, Greenlining
 Andrew Brooks, AEA
 Pete Skala, Energy Division
 Alison LaBonte, Energy Division
 Syreeta Gibbs, Energy Division

⁴⁰ The CARE marketing budget was included in Table 10 of Advice 3990-G-A/5329-E-A, Supplemental: ESA/CARE Mid-Cycle Update Advice Letter per Decision (D.) 17-12-009 (September 14th, 2018)

⁴¹ Consistent with D.18-08-013, Ordering Paragraph 16.

⁴² This future request will be made in compliance with D.18-08-013, pp. 181-182, OP 16.

⁴³ D. 18-08-013, pp. 75, 181 OP 15.

October 8, 2018

Advice 3990-G-B/5329-E-B

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Second Supplemental: Energy Saving Assistance (ESA)/California
Alternate Rates for Energy (CARE) Mid-Cycle Update Advice Letter
per Decision (D.) 17-12-009**

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 Phase 2 Proceeding (Decision), PG&E submits this second supplemental to PG&E's Advice Letter (AL) 3990-G/5329-E. This supplemental submits PG&E's "Marketing and Outreach (M&O) Plan for Family Electric Rate Assistance (FERA) Program." The M&O Plan details its proposals for using available and unspent marketing funds allocated to the California Alternate Rates for Energy (CARE) program to increase customer enrollment into the FERA program. The M&O Plan is enclosed in Attachment 1. This supplemental advice letter supersedes AL 3390-G-A/5329-E-A in part by adding the M&O Plan for the FERA Program and the remaining revisions contained in AL 3390-G-A/5329-E-A remain unchanged.

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.¹ The FERA Program was designed to assist larger families that are ineligible for the CARE rate because their income level falls slightly above the CARE program income eligibility limit.

FERA is available for households of three or more people that have a total household income of between 200 percent plus \$1 and 250 percent of the federal poverty guideline

¹ The Commission authorized the FERA program in D. 04-02-057.

level.² The income threshold increases with each additional family member over three people. Eligible FERA participants currently receive a 12 percent bill discount for their electric usage.³

In compliance with D.17-12-009, PG&E submitted Advice 3990-G/5329-E on July 16, 2018, to provide a Mid-Cycle update to various provisions of the the FERA/CARE program to achieve several goals. PG&E submitted the first supplemental to Advice 3990-G-A/5329-E-A on September 14, 2018 to correct some inadvertent errors. Advice 3990-G-A/5329-E-A replaced Advice 3990-G/5329-E in its entirety. This second supplemental to Advice 3990-G/5329-E is being submitted pursuant to Ordering Paragraph (OP) 16 of D.18-08-013.

In D.18-08-013, the CPUC ordered PG&E to make significant efforts to increase FERA enrollment over the next six years, from 2018 – 2023, with the goal of achieving a 50 percent FERA program subscription level.⁴ The CPUC also directed PG&E to file an amendment to its July 16, 2018 ESA/CARE Mid-Cycle Update within 60 days of the effective date of that Decision. In compliance with that Decision, PG&E files this Tier 2 AL to inform the Commission of PG&E's plans to use unspent, previously authorized CARE marketing funds on additional marketing and outreach efforts in 2018 through 2020 to increase FERA enrollment. The components of the newly ordered FERA marketing and outreach plans, as required by the Decision, are:

1. "Enhancing the CARE propensity model to more precisely identify FERA-eligible customers,"
2. "Using the new customer lists to conduct enrollment using direct mail, telemarketing, and/or email outreach, with the understanding that all such enrollment marketing must be co-marketing for both the CARE and FERA programs to remain consistent with the Public Utilities Code and Decision 16-11-022,"
3. "Expanding PG&E's existing community-based organization (CBO) efforts to target and increase CARE and FERA outreach, including a special focus in the Central Valley," and
4. "Any other measures PG&E believes would be useful to increase FERA participation by using co-marketing for the CARE and FERA program."⁵

² In D.05-10-044 (October 27, 2005), the lower income limits of the FERA Program were raised to 200%+\$1 of the Federal Poverty Guideline levels, which corresponds to the upper limits of the CARE Program.

³ In D.15-07-001, dated July 3, 2015, the Commission changed PG&E's FERA discount to a 12 percent effective discount as a single line-item on PG&E's bills. This year, through Senate Bill (SB) 1135, approved on September 14, 2018, the legislature added Section 739.12 to the Public Utilities Code and increased the FERA discount to 18 percent, effective January 1, 2019.

⁴ D. 18-08-013, pp. 74-76, 181 (Ordering Paragraph (OP) 15).

⁵ D. 18-08-013, pp. 75-76, 181-182 (OP 16).

PG&E does not request additional budget authorization in this AL. The proposed budget for incremental CARE/FERA marketing and outreach efforts included in the M&O Plan (Table 2, below) will use unspent funds from the authorized overall CARE marketing budget from 2018 – 2020 (Table 1, below):

Table 1: CARE PY 2018 – 2020 Overall Marketing Budget⁶

	2018	2019	2020
Outreach Revised Budget	\$9,558,816	\$9,301,337	\$9,628,265

PG&E will use the unspent funds from these previously-approved CARE marketing funds for incremental CARE/FERA M&O efforts described in the Plan. Below is the proposed budget for these efforts:

Table 2: Proposed Budget for Incremental CARE/FERA-Targeted Joint M&O Efforts,⁷ Using Previously-Approved but Unspent CARE Marketing Funds

	2018	2019	2020	Total
CARE/FERA M&O proposed budget	\$129,200	\$1,083,300	\$811,100	\$2,023,600

PG&E will include a longer-term FERA- specific M&O proposal and budget in its upcoming 2021-2025 low-income program application, to be filed June 1, 2019.⁸

Consistent with D. 18-08-013, PG&E will report to Energy Division on its progress toward increasing FERA enrollment by filing information-only AL a at the end of 2018, 2019, 2020, 2021, 2022 and 2023.⁹

Protests

Pursuant to CPUC General Order 96-B, Section 7.5.1, PG&E hereby requests the protest period be waived.

⁶ The CARE marketing budget was included in Table 10 of Advice 3990-G-A/5329-E-A, Supplemental: Energy Saving Assistance (ESA)/California Alternate Rates for Energy (CARE) Mid-Cycle Update Advice Letter per Decision (D.) 17-12-009 (September 14, 2018)

⁷ Consistent with D.18-08-013, Ordering Paragraph 16.

⁸ This future request will be made in compliance with D.18-08-013, pp. 181-182, OP 16.

⁹ D. 18-08-013, pp. 75, 181 (OP 15)

Effective Date

PG&E is submitting this advice letter with a Tier 2 designation, which is the same tier designation as the original advice letter, Advice 3990-G-A/5329-E-A. Pursuant to GO 96-B, General Rule 7.5.1, the filing of a supplement, or of additional information at the request of the reviewing Industry Division, does not automatically delay the effective date of the advice letter. Therefore, PG&E respectfully requests that this supplemental advice filing become effective concurrent with original Advice 3990-G-A/5329-E-A, which is effective October 14, 2018.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.14-11-007 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 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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

Attachment 1 – FERA Marketing and Outreach Plan

cc: Service Lists in A.14-11-007, A.14-11-009, A.14-11-101, and A.14-11-011



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 U39M)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: OXY1@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) #: 3990-G-B/5329-E-B

Tier Designation: 2

Subject of AL: Second Supplemental: Energy Saving Assistance (ESA)/California Alternate Rates for Energy (CARE)
Mid-Cycle Update Advice Letter per Decision (D.) 17-12-009

Keywords (choose from CPUC listing): Compliance, Self Generation, Solar

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.17-12-009 and 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: 10/14/18

No. of tariff sheets: N/A

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Advice 3990-G-B/5329-E-B
October 8, 2018

Attachment 1

FERA Marketing and Outreach Plan



Pacific Gas and Electric Company

Marketing and Outreach Plan for Family Electric Rate Assistance (FERA) Program Per D.18-08-013

October 8, 2018

MARKETING AND OUTREACH PLAN FOR FERA PROGRAM

TABLE OF CONTENTS

1. Introduction	3
2. Situation Analysis	6
2.1 Program Background	6
2.1.1 FERA Customer Population, Participation and Goals.....	6
2.2 Customer Insights & Analysis.....	8
2.2.1 Demographic overview	8
2.2.2 Audience overview	9
2.3 Propensity model	9
2.3.1 Leveraging the CARE propensity model to target outreach efforts.....	9
2.3.2 Audience analysis/marketable universe	10
2.3.3 Opportunities in the Central Valley	11
2.4 Keys to Success.....	12
2.5 Risks and Challenges.....	12
3. Marketing Objectives	13
4. Marketing Strategies.....	13
4.1 Messaging.....	14
4.2 Test, Learn and Optimize	15
4.3 Recertification Tactics	17
4.4 Post-Enrollment Verification	18
5. Community Outreach.....	18
5.1 Community Based Organizations	18
5.2 Current CARE/FERA Enrollment Strategy	19
5.3 FERA Outreach Expansion and Workshop	20
6. Other support channels.....	22

Pacific Gas and Electric Company FERA Program Marketing and Outreach Plan
MARKETING AND OUTREACH PLAN FOR FERA PROGRAM

TABLE OF CONTENTS
(continued)

6.1	Website	22
6.2	Increase Reach through Media Relations (Public Relations)	24
6.3	Develop Broader Awareness of FERA Among PG&E Employees	24
6.4	Community Events / Local Offices.....	25
6.5	Contact Center Support.....	25
6.6	Cooling Centers	26
7.	Implementation	26
8.	Measurement and Metrics	26
9.	Budget	27
10.	Reporting	28

FERA PROGRAM MARKETING AND OUTREACH PLAN

1. Introduction

Through a sustained effort over many years, PG&E has successfully achieved high awareness and participation rates for both the California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) programs. PG&E has achieved these results through ongoing targeted marketing and outreach campaigns, which have continued to evolve through data-based decision making and lessons learned. These lessons can now be used to inform marketing and outreach efforts designed to increase customer participation in the Family Electric Rate Assistance (FERA) program.

PG&E supports the Commission's direction, in Decision (D.)18-08-013, that additional marketing and outreach efforts, designed to increase FERA enrollment, be undertaken from late 2018 through the end of 2020, using previously-approved underspent CARE marketing and outreach funding.¹ Because the estimated FERA-eligible customer population in PG&E's territory is significantly smaller than the CARE-eligible population (about 3 percent versus 30 percent), PG&E expects that it will be considerably more difficult to target customers for FERA enrollment than for CARE-program enrollment. PG&E will use a test and learn approach, with initial efforts focused on exploratory testing to help identify effective methods for targeted marketing.

PG&E developed this Marketing and Outreach (M&O) Plan for the FERA program, as part of the Amendment to its July 16, 2018 Mid-Cycle Update filing required by D.18-08-013, to address four key points set forth in that CPUC decision:

- 1) enhancing the CARE propensity model to more precisely identify Family Electric Rate Assistance (FERA)-eligible customers, 2) using the new customer lists to conduct enrollment using direct mail, telemarketing, and/or email outreach, with the understanding that all such enrollment marketing must be co-marketing for both the CARE and FERA programs to remain consistent with the Public Utilities Code and Decision 16-11-022, 3) expanding PG&E's existing community-based organization (CBO)

¹ D.18-08-013, p. 76.

efforts to target and increase CARE and FERA outreach, including a special focus in the Central Valley, and 4) any other measures PG&E believes would be useful to increase FERA participation by using co-marketing for the CARE and FERA program.²

The strategies and tactics outlined in this Plan are designed to cost-effectively grow FERA awareness and participation, using previously-approved underspent CARE M&O funding, while generating new lessons about targeting, channels and messaging that will be used to evolve the FERA M&O plan over time. The following marketing strategies outlined in the Plan are designed to achieve the four points as noted above.

- Build FERA awareness through continued marketing and outreach efforts over a period of years
- Test, learn and optimize, evolving outreach strategies and tactics based on results, and application of lessons learned
- Focus initial efforts on channels that have proven successful for CARE acquisition efforts to learn how to effectively reach FERA customers
- Leverage customer insights and results from CARE research to inform FERA messaging development and testing for FERA outreach

Sections 4 through 6 discuss the messaging approach, as well as providing examples of the types of direct marketing and awareness tactics that can be employed to drive FERA participation. Additionally, these sections suggest potential FERA integration or enhancements to include FERA in current CARE post-enrollment tactics.

Section 5 of the Plan provides information about CBO outreach, with section 5.3 outlining expansion opportunities to include:

- Partnering directly with CBOs in high FERA enrollment opportunity areas, funding them to conduct FERA outreach, in addition to other assistance programs and energy management tools, through various outreach channels
- Leveraging existing community events to include a FERA focus
- Conducting at least one FERA focused workshop in the Central Valley via participation in a Community Resource Fair

² D. 18-08-013, pp. 75-76, 181-182 (OP 16).

As ordered in D.18-08-013, PG&E will annually report to Energy Division the progress under this plan to increase FERA enrollment to Energy Division, with reports served at end of 2018, 2019, 2020, 2021, 2022 and 2023.³ Also consistent with direction in D.18-08-013, PG&E will include a comprehensive FERA program proposal in the 2021-2025 low-income program application to be filed June 1, 2019. This program proposal may reflect updates to this Plan.

³ D. 18-08-013, pp. 75, 181 (OP 15).

2. Situation Analysis

2.1 Program Background

The FERA program, also known as the Lower Middle Income Large Household Program, was authorized by the Commission in Decision (D.) 04-02-057. PG&E has administered the program since 2004.

The FERA program currently provides a monthly 12 percent single line-item discount on electric bills⁴ for lower to middle income large households of three or more persons, with household income between 200 percent + \$1 and 250 percent of the Federal Poverty Guideline levels. Customers or sub-metered tenants enrolling in the CARE program cannot concurrently enroll in the FERA program.

The FERA program serves two eligible customer segments: 1) single-family residential households with their own PG&E electric accounts; 2) sub-metered tenants of master-metered facilities, such as mobile home parks and sub-metered apartment complexes. Qualifying Direct Access, Community Choice Aggregation, and Transitional Bundled Services customers, are also eligible for the FERA program.

The CARE and FERA programs use a joint enrollment application. When a customer provides information that demonstrates they are not eligible for CARE but the household income and household size meet FERA eligibility requirements, they are enrolled in the FERA program.

PG&E currently estimates that approximately 169,000 customers within PG&E's territory could be eligible for the FERA discount, whereas about 24,731 customers were enrolled in the FERA program at the end of August 2018. This equates to a FERA enrollment penetration rate of about 15% of PG&E's qualified customers. Under the FERA program, since its inception in 2004, nearly \$63.68 million in cumulative subsidies have been provided to PG&E's enrolled FERA customers.

2.1.1 FERA Customer Population, Participation and Goals

D. 18-08-013, Ordering Paragraph 15, ordered PG&E to make significant efforts to increase FERA program enrollment over the next six years, with the aim of achieving a 50% penetration goal by the end of 2023. PG&E is committed to working towards

⁴ Senate Bill (SB) No. 1135, approved on September 14, 2018, added Section 739.12 to the Public Utilities Code and increased the FERA discount to 18 percent, effective January 1, 2019.

achieving this goal, though additional testing and data analysis is needed to determine how the 50% penetration goal can be cost-effectively achieved.

Table 1 below presents the estimated total number of PG&E households that would need to be enrolled in FERA by the end of 2023 to achieve 50% penetration:

Table 1: Forecast of 2018 – 2023 FERA Enrollment Activity

Program Activity	2018 – 2023
New Enrollments	139,000
Recertification	95,000
Attrition	81,000
Net Increase	58,000
Enrollment by Year-End 2023	85,000
Penetration Rate by Year-End 2023	50%

To achieve a 50% penetration rate, PG&E must enroll 85,000 households in FERA by year-end 2023, a net enrollment increase of 58,000 households from 2018-2023.

This net enrollment increase takes into account the projected 95,000 recertification and 139,000 new enrollments that will compensate for 81,000 in attrition from 2018 - 2023.

The projected attrition is based on the historical average and projected recertification rates. Twenty-eight percent of enrolled households are expected to drop off the program annually due to several reasons including: customers choosing to close their accounts, do not recertify their eligibility before their FERA discount expires, or informing PG&E of their ineligibility. The projected recertification includes both customers scheduled to recertify as well as duplicate applications customers submitted before their scheduled recertification period. The projected recertification rate is based on planned enhancements to the recertification process mentioned below in Section 4.3.

2.2 Customer Insights & Analysis

Low-income customers represent a large portion of PG&E's market, and is estimated at over 1.5 million customers.⁵ While the low-income population has very distinct and diverse customer segments, a look across this low income customer base reveals some commonalities that are important to consider as messages and tactics are evaluated to acquire customers into the FERA program.

2.2.1 Demographic Overview

In the Low-Income M&O plan⁶, PG&E outlined demographics for its low-income customer population. Examination of the CARE and FERA customer profiles⁷ showed that the largest racial/ethnic groups for FERA mirror CARE, with the highest distribution among the Latino/Hispanic, Caucasian and East/Southeast Asian populations.

According to Acxiom modeling⁸, the language preference among PG&E's FERA-enrolled customers is English (57 percent), followed by Spanish (29 percent). PG&E offers in-language services across many customer touch points, including marketing outreach, CBO efforts, the Contact Center and the PG&E website.

In comparing FERA and CARE age distribution, FERA appears to skew more towards those in the middle age ranges (25-64 years), whereas CARE has more customers in the younger (18-24 years) and older (65+ years) age ranges. This is likely due to the FERA household size requirement, and the fact that younger customers and seniors are more likely to be living in smaller households.

FERA customers are more likely to be homeowners (69 percent) compared to both CARE (52 percent) and PG&E's overall residential population (67 percent). As would be expected, based on the FERA household size requirement, FERA customers are more likely than average customers to have larger household sizes.

⁵ Based on eligible estimates provided by Joint Utilities' consultant, Athens Research.

⁶ Pacific Gas and Electric Company's (U 39 M) Marketing and Outreach Plan for Low Income Per Decision 16-11-022. A.14-11-007, et al. (July 21, 2017).

⁷ PG&E Residential profiles for CARE and FERA enrolled and non-enrolled customers, Customer Analytics and Segmentation Database, May 31, 2018.

⁸ Acxiom is a third-party data provider that provides modeled data that PG&E uses to supplement customer data in the Customer Analytics and Segmentation Database (CAS) for targeting and personalization of marketing campaigns.

2.2.2 Audience Overview

The target audience for FERA is residential customers in PG&E's service territory with three or more people in the household, and household income 200 percent plus \$1 to 250 percent of the federal poverty level. While CARE awareness is high in PG&E's service territory⁹, FERA has not been promoted in a manner that would drive a similar level of awareness.

PG&E believes that FERA-eligible customers are likely to share common barriers to enrollment that have been observed in CARE customer enrollment efforts. Enrollment barriers, and how PG&E seeks to address them, were explored in detail in the Low-Income M&O plan. These barriers include:

- Overwhelming stress and financial troubles that leave little time and energy to seek assistance;
- Being unaware of full program benefits, including the magnitude of the discount, leading customers to believe that it's not worth their effort to apply;
- Confusion about program eligibility and recertification criteria;
- Lack of understanding about how to fill out the income qualification portion of the application, and fear of repercussions for incorrectly filling out forms;
- General distrust or fear of disclosing personal information; and
- Reluctance to take "charity" or a "hand-out."

2.3 Propensity Model

2.3.1 Leveraging the CARE Propensity Model to Target Outreach Efforts

PG&E plans to leverage its CARE propensity model as the foundation for targeting FERA-eligible, non-enrolled, income-qualified customers. The CARE propensity model was developed in 2013, and further enhanced in 2016. The model was constructed using data collected from the CARE post enrollment verification process, looking at variables that were deemed to be positive or negative indicators of a customer's qualification for CARE. The current model uses 21 variables to create an algorithm to score customers based on their predicted CARE qualification. PG&E's residential customer database (CARE and non-CARE) is scored quarterly and grouped into ten

⁹ CARE awareness for CARE-eligible, unenrolled customers is 61 percent based on the PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

deciles. The customers most likely to be eligible for CARE are those in the lower deciles.

Analysis of the current FERA customer base revealed that the profiles for CARE and FERA customers are very similar. PG&E will use its CARE eligibility propensity model as a starting point for identifying customers that are likely to be eligible for the FERA program. Specifically, to identify FERA-eligible customers PG&E plans to overlay filters onto its current CARE propensity model for household size as well as household income within the required income range for FERA eligibility. PG&E believes that this methodology will enable the creation of campaign lists that can be more discretely targeted to customers that are likely to be FERA eligible. The nature of modeled data can mean that some unqualified customers may be contacted; however, the benefits of using the model outweigh this risk.

2.3.2 Audience Analysis/Marketable Universe

PG&E performed an initial analysis of PG&E residential customers not enrolled in either the CARE or FERA program. PG&E currently believes that an estimated 145,000 PG&E residential customers are likely to be FERA-eligible but not yet FERA-enrolled. Of these, approximately 62 percent can be identified using household income and household size filters on top of PG&E’s CARE propensity model, as shown below:

Table 2: Estimated CARE and FERA Targetable Universe^(a)

Decile	Total Customers	CARE / FERA		CARE ELIGIBLE AND NOT ENROLLED IN CARE/FERA	FERA ELIGIBLE AND NOT ENROLLED IN CARE/FERA	NOT ELIGIBLE / UNKNOWN	
		Total CARE/FERA Enrolled	Total CARE/FERA Non-Enrolled			Not Eligible	Unknown
		1	520,704			388,654	132,050
2	520,693	293,346	227,347	71,834	8,628	78,795	68,090
3	520,716	209,323	311,393	70,896	11,703	130,565	98,229
4	520,761	148,563	372,198	57,919	14,440	178,605	121,234
5	520,648	105,394	415,254	41,998	14,432	223,480	135,344
6	520,703	74,612	446,091	28,656	12,895	263,777	140,763
7	520,705	53,271	467,434	18,749	10,339	311,428	126,918
8	520,705	37,870	482,835	11,597	7,843	382,904	80,491
9	520,704	24,698	496,006	5,704	4,462	452,385	33,455
10	520,704	11,697	509,007	1,615	1,490	498,218	7,684
	5,207,043	1,347,428	3,859,615	368,414	89,633	2,548,174	853,394
			100.0%	9.5%	2.3%	66.0%	22.1%

(a) PG&E Residential profiles for CARE and FERA enrolled and non-enrolled customers, Customer Analytics and Segmentation Database, August 27, 2018.

A large portion (22 percent) of unenrolled customers are categorized as “unknown,” meaning that the data attributes are not available to segment them within the FERA or CARE-eligible universe. PG&E will consider test plans that include selections within the “unknown” audience segment to provide learning about how these customers respond to marketing outreach.

2.3.3 Opportunities in the Central Valley

A geographical cut of the data demonstrates that 42 percent of the customers identified as FERA-eligible reside in the Central Valley. This data supports D. 18-08-013’s guidance that additional attention be placed on the Central Valley in outreach plans.

Table 3: Estimated FERA Targetable Universe in the Central Valley ^(b)

Decile	Total Customers	CARE / FERA		FERA ELIGIBLE AND NOT ENROLLED IN CARE/FERA	CENTRAL VALLEY(c)	NOT ELIGIBLE / UNKNOWN	
		Total CARE/FERA Enrolled	Total CARE/FERA Non-Enrolled		FERA ELIGIBLE AND NOT ENROLLED IN CARE/FERA	Not Eligible	Unknown
1	138,278	100,615	37,663	3,401	904	7,660	10,702
2	180,900	101,912	78,988	8,628	3,096	24,940	23,163
3	190,763	78,757	112,006	11,703	4,801	43,862	35,026
4	190,908	57,808	133,100	14,440	6,356	61,096	42,323
5	175,925	38,713	137,212	14,432	6,516	75,105	39,250
6	161,559	26,067	135,492	12,895	5,694	84,883	34,076
7	146,562	17,406	129,156	10,339	4,407	94,549	23,396
8	140,319	11,548	128,771	7,843	3,194	107,099	14,441
9	131,050	6,697	124,353	4,462	1,718	113,424	7,413
10	104,831	2,622	102,209	1,490	500	99,590	1,679
Total	1,561,095	442,145	1,118,950	89,633	37,186	712,208	231,469

(b) PG&E Residential profiles for CARE and FERA enrolled and non-enrolled customers, Customer Analytics and Segmentation Database, August 27, 2018.

(c) Approved by the CPUC, PG&E service-area sections that have similar geographic and weather characteristics are known as climate zones P, Q, R, S, T, V, W, X, Y and Z. Central Valley is defined PG&E climate zones P and S.

2.4 Keys to Success

PG&E plans to make progress in 2018 – 2020 toward the overall 2023 goal of achieving 50% FERA penetration through successful execution of several key initial initiatives.

First, taking lessons from the effort required to grow the penetration rate for the CARE program, PG&E believes that considerable focus should be placed on increasing awareness of the FERA program, including creating more visibility for FERA in marketing campaigns, outreach, advertising and on the website. Working towards the goal will require ongoing testing, monitoring and adjustments to the marketing plan.

Second, development of cost-effective methods for identifying and targeting the right customers to enroll in FERA can be achieved with implementation of a thorough test and learn strategy. Currently, PG&E plans to use the CARE propensity model as the foundation for targeting FERA-eligible customers, as discussed in Section 2.3.1. Based on lessons learned, PG&E will be able to build on initial efforts and will continue to optimize outreach and grow the penetration rate, while remaining focused on cost-efficiency.

Finally, a dedicated FERA M&O budget will be proposed in PG&E's June 2019 Low-Income application for the 2021 – 2025 period, building from initial exploration of program initiatives, process improvements and customer experience initiatives in 2018 – 2020, designed to be the initial driver for increased FERA enrollment and retention consistent with the CPUC's guidance in D.18-08-013.

2.5 Risks and Challenges

There are several risks and challenges to this plan being successful in driving increased FERA participation:

- With the minor difference in household income requirements between the CARE and FERA programs, there is a risk that customers who are FERA eligible may instead enroll in the CARE program. PG&E expects that its CARE post-enrollment verification process should help to identify these customers and move them into FERA if they are eligible.
- The small estimated eligible population for FERA (approximately 3 percent of total residential customer population) makes it more difficult to identify and target these customers. PG&E plans to cast a wider net to ensure that as many potentially FERA- eligible customers as possible are receiving program

marketing. This requires a marketing budget beyond just the cost of targeting the estimated FERA-eligible population.

- Co-promotion of CARE and FERA necessitates that the program requirements be presented clearly so customers understand the difference in the two programs, including the differences in household income and household size requirements. The test and learn strategy will include message testing designed to identify effective positioning for and descriptions of these two different programs.
- Customers who look to be FERA-eligible, may actually be CARE-eligible due to a categorical qualification for CARE. As an example, if a household of three people has total household income that falls outside the CARE limits, but also has one household member who participates in a qualified assistance program, that whole household would be eligible to enroll in CARE through this categorical qualification. It appears that about 4 percent of those with a CARE categorical enrollment showed an income within the FERA guidelines, which further reduces the pool of FERA-eligible customers.

3. Marketing Objectives

PG&E has defined the following marketing objectives: 1) increase awareness of the FERA program, and the program eligibility requirements; and 2) drive enrollment in the FERA program to support the goal of achieving 50 percent penetration in the program by the end of 2023. To accomplish these objectives, PG&E plans to design, develop and implement test campaigns that will establish marketing performance benchmarks, and enable progress measurement. Regular review of these objectives will provide feedback and possible corrective actions on a timely basis.

4. Marketing Strategies

Marketing strategies will focus on increasing FERA awareness, as well as testing communication channels to drive customer acquisition.

There are four central strategies that will help PG&E reach FERA customers:

- **Build FERA awareness.** With sustained effort over many years, PG&E successfully achieved high awareness and participation rates for both the CARE and ESA programs, with 89 percent CARE penetration rate for all eligible and willing low-income customers and 2,052,510 homes treated by

the ESA program¹⁰. PG&E hypothesizes that one of the reasons that FERA penetration remains lower than the CARE and ESA programs is due to a lack of awareness. PG&E anticipates that building similar awareness levels for FERA will require continued marketing and outreach effort over a period of years.

- **Test, learn and optimize.** PG&E achieved positive results in driving penetration for the CARE through significant investment in ongoing targeted M&O campaigns. These campaigns continue to evolve based on ongoing testing, and application of lessons learned. PG&E plans to continually measure marketing effectiveness and key marketing performance indicators, and frequently tests marketing strategies, tactics and messages through a combination of research and in-market data achieved through A/B testing. Testing and measurement will be critical to understanding how different marketing approaches impact FERA enrollment and ensuring that outreach is as cost-effective as possible.
- **Use successful channels from CARE acquisition efforts.** The profile similarities between CARE and FERA customers indicate that marketing efforts for FERA should start with use of the same channels that were successful for CARE. PG&E will begin testing a combination of paid media campaigns and direct marketing efforts that will have more specific, targeted messages intended to place greater focus on the FERA program.
- **Leverage customer insights from CARE to inform FERA messaging.** PG&E has significant data on low-income customers pertaining to how and when they respond to financial assistance programs, their connections to specific messages and their response to tactical elements. PG&E plans to use these insights to inform messaging development and testing for FERA outreach.

4.1 Messaging

As part of the marketing and outreach efforts to increase CARE enrollment, PG&E conducted research and tested messaging approaches to engage customers. Because

¹⁰ PG&E ESA/CARE 2017 Annual Report filed with CPUC on May 1, 2018.

the customer profiles for CARE and FERA are very similar, FERA outreach will draft heavily off the lessons learned from CARE message testing. Messages should be developed to: demonstrate empathy and understanding of what the customer encounters when working to manage and maintain their household; explicitly address specific enrollment barriers such as the amount of time it takes to enroll, or concerns about privacy; and leverage social norming messages such as highlighting the number of people who benefit from participation in the program.

While PG&E expects that the lessons from CARE marketing will help to develop messages to promote FERA, there are some unknowns about the best methods for driving response to the FERA program. PG&E posits that there is a potential for customer confusion about the difference in eligibility requirements for CARE and FERA. Because the mandate is to co-market CARE and FERA¹¹, PG&E will look to test different ways to clearly differentiate the circumstances in which a customer would apply for FERA.

Another unknown factor is what offer will be most effective at driving response for FERA. Current CARE campaigns and materials prioritize the offer of an “at least 20% discount” off the monthly energy bill. The FERA customer-facing messages do not include the percentage discount amount, so PG&E will want to test different ways to present the FERA offer to determine the impact on customer response.

4.2 Test, Learn and Optimize

Media and outreach activities to promote FERA will be conducted with the understanding that “marketing must be co-marketing for both the CARE and FERA programs to remain consistent with the Public Utilities Code and Decision 16-11-022.”¹²

In addition to bill inserts, newsletter articles, Home Energy Reports and pge.com content, PG&E will assess additional tactics to more heavily promote FERA moving forward, leveraging the channels that have proven successful in driving CARE enrollment. PG&E will develop test plans to establish baseline metrics against which ongoing results can be evaluated, and campaigns can be optimized.

¹¹ D.18-08-013, OP 16.

¹² D.18-08-013, OP 16.

PG&E plans to conduct an initial direct mail and email test in mid-2019 to understand the overall positioning and response rates. Analysis of results from this test will look at how different customer segments respond to positioning CARE and FERA together. Based on the data collected, PG&E will revisit its plans to determine a cost-effective approach, including introducing multi-touch direct mail and email campaigns.

Digital and paid media campaigns have been successful in driving acquisition for CARE. Media plans leverage customer mapping to identify and target low-income customers in areas with lower participation and/or with a significant population of hard-to-reach groups. Pending initial FERA test results, PG&E plans to leverage digital advertising to support acquisition in FERA.

Although PG&E media plans will target the entire territory footprint, additional weight may be applied in the Central Valley to focus on this important area.

FERA terms are already included as part of paid search engine marketing tactics for CARE always-on digital strategy. These campaigns can drive customers to a combined CARE/FERA landing page on pge.com¹³ where the guidelines for both programs are presented, and the customer is encouraged to enroll.

The low-income marketing strategy currently includes TV and radio media in both English and Spanish to drive awareness and support CARE and ESA acquisition campaigns. PG&E plans to examine how targeted broadcast media channels may be utilized in the future to promote increased FERA awareness and enrollment. Both creative development and media cost are an important consideration, but data shows that television and radio are highly utilized by low-income households so may act as strong awareness drivers¹⁴. Using broadcast media also allows for additional focus to be placed in areas deemed to be high-priority, such as the Central Valley.

PG&E's media plans will also consider ethnic media opportunities to support awareness and engage low-income customers. Paid media plans include Spanish language stations and web sites to increase overall awareness and to reach eligible customers in their preferred language. These media buys often garner earned media (or

¹³ pge.com/CARE and pge.com/FERA.

¹⁴ Nielson. The Total Audience Report <http://www.nielson.com/us/en/insights/reports/2015/the-total-audience-report-q3-2015.html>.

value-added opportunities) such as pre-recorded or live interview segments where PG&E can provide information about a suite of programs and tools.

4.3 Recertification Tactics

FERA enrolled customers are required to self-recertify their eligibility every two years. Currently, customers will receive a renewal application 90 days prior to the date on which their FERA discount is set to expire.

Under the CARE program, as participants approach the recertification period, there are two campaigns currently in place to promote retention in the CARE program: (1) auto-reenrollment, and (2) recertification reminders.

Auto-reenrollment occurs approximately 180 days prior to the expiration date for customers in deciles 1 and 2 of the propensity model. PG&E sends these customers notification via direct mail and email to alert them that they've been automatically reenrolled in the CARE Program and no further action is required by the customer to continue to receive the CARE discount. The email includes messaging that the customer should contact PG&E if they no longer qualify for CARE due to changes in income or other household needs. The auto-reenrollment email offers a touchpoint to incorporate a FERA qualification message in case the customer no longer qualifies for CARE, but would qualify for FERA.

The CARE recertification reminder campaign offers an opportunity to promote FERA. For customers required to recertify, PG&E notifies the customer at 150 days out from the recertification date by automated voicemail. Starting at 120 days out, a recertification reminder campaign is initiated, and customers are notified by direct mail, email and automated voicemail. Reminders are continued via email at 90, 60 and 30 days prior to the recertification deadline. Messaging could be added to the campaign content to encourage customers to check the requirements for FERA and apply for the discount if they believe they no longer qualify for CARE.

PG&E plans to consider development of a similar FERA recertification reminder campaign. Integration of FERA customers into the existing process would require additional data file creation and programming, as well as A/B testing. For example, a test may be constructed that looks at whether a general reminder message versus a program specific reminder is more effective at driving customers to recertify.

4.4 Post-Enrollment Verification

During the CARE program enrollment period, customers may be selected to participate in the post-enrollment verification (PEV) process to verify household eligibility. Customers are selected for PEV based on the following:

- Customers with a decile score of 9-10
- Customers with high usage (+400 percent of baseline)
- Approximately 1 percent annual random selection

Customers selected for PEV receive different letters depending on whether they are required to go through the standard PEV or the High Usage PEV process. The letter details the requirements, instructions for completion and required forms. To continue receiving the monthly CARE program discount, the customer must provide requested documentation within 45 days. If a customer provides PEV documentation that does not meet the stated requirements for continued enrollment in CARE, they will be removed from the CARE program and are prohibited from re-enrolling for 24 months or until they demonstrate compliance with the stated requirements. However, if the customer provides PEV documents that show they meet the stated requirements for FERA, they will be removed from CARE and enrolled in FERA if they are otherwise FERA-eligible based on household size.

PG&E plans to propose a PEV process specific to the FERA program in its 2021-2025 low-income program application, to be filed in June 2019.

5. Community Outreach

Complementing PG&E's multi-touch approach, PG&E's community engagement efforts are critical to providing awareness of our assistance programs and energy education to hard-to-reach customers.

5.1 Community Based Organizations

PG&E's community engagement and outreach strategy focuses on building trusted community relationships and strategic partnerships with the goal of informing PG&E's customers on assistance programs, resources, tips and tools. Community outreach efforts via community based organizations (CBOs) can be a highly effective means to engage and gain the trust of customers who might otherwise not engage with PG&E.

Community partners complement traditional marketing tactics with one-on-one direct interaction with hard-to-reach customers and utilize the following channels including, but not limited to:

- 1) Face-to-face awareness at a CBO or other trusted location and education efforts with impacted customers through Community Outreach Contractors and Health Outreach Workers.
- 2) Community workshops through Community Outreach Contractors, Health Outreach Workers and Energenius® family engagement activities.
- 3) Door-to-door campaigns within a respective community, reaching a customer at their home, through Community Outreach Contractors and Health Outreach Workers.
- 4) Outreach through churches and other faith-based groups through Community Outreach Contractors.

The communities served by these CBOs include, but are not limited to African American, Asian-Pacific American, Cambodian, Chinese, Hmong, Japanese, Korean, Hispanic, Lao, Native American, Russian, Vietnamese, Disabled, Seniors and Veterans. The primary in-language support for customers is in Spanish, Chinese, Vietnamese, Tagalog and Hmong. However, many CBOs also provide support in: Burmese, Cambodian, Hmong, Japanese, Korean, Lao, Tagalog, Taiwanese, Thai and Russian.

5.2 Current CARE/FERA Enrollment Strategy

PG&E currently works with CBOs to promote assistance programs through multiple channels. These channels include the Community Outreach Contractor (COC) Program, Health Outreach Workers Program and the Energenius® Program. These outreach channels focus on CARE, FERA, ESA, Medical Baseline, REACH, LIHEAP and energy management tools such as Bill Forecast Alerts, Budget Billing, Rate Options (including Time-of-Use rate plans) and Home Energy Checkup.

A summary of each of these current community outreach efforts is as follows:

- Community Outreach Contractors (COC) Program: Performance-based contracts with 48 organizations, which receive a \$20 capitation fee per CARE new enrollment. If customers are not eligible for CARE, COCs enroll eligible customers into the FERA Program.

- Health Outreach Workers (HOW) Program: Known as promotoras, these health outreach workers go door-to-door as well as conduct outreach at community gathering places delivering a culturally and linguistically specific outreach to the Spanish-speaking community on PG&E's energy management tools and assistance programs, including FERA.
- Energenius® Out-of-School Time (OST): Partnership with the California School-Age Consortium (CalSAC) to train out of school time professionals on Energenius® curriculum and conduct family engagement activities promoting PG&E's energy management tools and assistance programs, including FERA.

5.3 FERA Outreach Expansion and Workshop

In D.18-08-013, the Commission directed that “PG&E should particularly focus its efforts in the Central Valley,... [and] should work with CBOs in the Central Valley to increase rates of FERA participation.”¹⁵ In addition, PG&E must “expand PG&E's existing CBO efforts to target and increase CARE and FERA outreach, including a special focus in the Central Valley.... PG&E shall specify the expanded efforts that it will undertake with CBOs, including any contracting that is planned, along with the budget for expanded CBO efforts.”¹⁶ PG&E presents here its initial concepts for expanded CBO outreach targeting FERA enrollement, with special focus in the Central Valley.

As part of PG&E's increased outreach seeking higher levels of FERA enrollment, PG&E plans to complement its multi-touch marketing approach with CBO outreach. Specifically, PG&E is exploring a couple of expansion opportunities building off of the existing outreach listed above. These efforts include the following:

- Partnering directly with CBOs in high FERA enrollment opportunity areas, funding them to conduct FERA outreach, in addition to other assistance programs and energy management tools, through various outreach channels
- Leveraging existing community events to include a FERA focus

PG&E has already begun supporting community partners to engage the low-income customers they serve on opportunities for energy literacy, awareness, and education.

¹⁵ D.18-08-013, pp. 181, OP 15.

¹⁶ D.18-08-013, pp. 182, OP 16.

Community partners also recognize that energy costs are changing and they, too, want to help prepare their low-income clients as much as they can. Therefore, PG&E has deepened its relationships with community partners across sectors like community health, education, and housing to bring energy management closer to their communities. Through targeted training modules and curriculum on CARE, FERA, ESA, Medical Baseline, REACH, LIHEAP and energy management tools, these community partners are knowledgeable and better equipped to hold conversations with their clients and share tips and tools about savings and energy assistance.

As PG&E explores specific outreach for the FERA program, the utility is identifying key strategic partners in geographic areas where there is a high FERA enrollment opportunity, including especially the Central Valley. This will be a data-driven approach identifying both geographic and demographic information on FERA eligibility.

Once FERA eligibility is determined in geographic areas of high FERA enrollment opportunity, PG&E will seek community based organizations to deliver a culturally and linguistically specific outreach and awareness effort that will provide relevant training and support to increase awareness around available resources, tools and programs for hard-to-reach communities. The primary goal of this outreach will be to increase CARE and FERA enrollment and awareness on energy management tools, including Time-of-Use rate plans.

Outreach channels may include the following:

- Community Workshop / Presentations: gathering specifically to discuss services (approx. 5-20 individuals)
- Community Events: tabling (including tabling at PG&E local offices and/or cooling centers); Fair / Festival, Open House, Organizational Base (ex. Housing Association)
- Client Services: working with new and existing clients of CBO in one-on-one conversation
- Door-to-Door outreach campaigns: targeted areas where representative(s) approaches domicile or business

Interaction types with customers may include the following:

- Customer Education: customer actively completes a form and returns to organization and / or customer gives their information for follow-up services with organization
- Customer Touch: a brief interaction with a customer where they receive a brochure or application to take with them

PG&E will look at the following criteria overall in determining CBO partners for FERA outreach:

- Counties with high number of FERA eligible customers
- Target populations
- Languages served
- Geographic / service area
- Programs and services
- Outreach plan
- Frequency of outreach activities

In addition to identifying CBOs to conduct outreach on the utility's behalf, PG&E is leveraging at least one Community Resource Fair in the Central Valley by including a FERA focused workshop. Community Resource Fairs include outreach on health services, immigration, education and financial literacy. Including a FERA focus in at least one of these fairs will be beneficial to attendees who will already be in attendance seeking assistance on a number of issues.

6. Other support channels

PG&E leverages a variety of channels to support its overall marketing strategies.

These opportunities serve to:

- Drive further awareness by amplifying messages through the website, employees and the media.
- Assist customers with low-income program enrollment and provide personalized information to help customers understand and manage their energy use, via CSRs, events and local office staff.
- Allow PG&E to deliver geographically targeted messages through community engagement efforts.
- Support hard-to-reach customers in their language of choice through PG&E's media relations, community engagement efforts, contact center, and website.

6.1 Website

PG&E's website provides low-income customers with easy ways to view and pay their bill, set up recurring payments, review their rate plan options, sign-up for paperless

bills, report outages and start, stop, or transfer service. Many low-income customers, including over 630,000 CARE and FERA-enrolled customers, have online accounts.¹⁷

Between 67 percent and 82 percent of low-income customers own a smartphone, and many depend on their mobile device to access online content.¹⁸ In 2016, PG&E comprehensively redesigned its website and strives to meet the Web Content Accessibility Guidelines (WCAG) AA Standards.¹⁹ As part of the accessibility improvements, PG&E updated its website to include a refined web design with larger fonts, a higher color contrast, easy click buttons for key actions, and updated videos with closed captioning and written transcripts. This website redesign makes it easier for PG&E customers with disabilities to find assistance programs and other tools to better manage their energy use.

The PG&E website serves as an important channel for CARE acquisition, with marketing campaigns including a call-to-action that directs customers to the CARE landing page, which receives approximately 39,000 visits per month. In 2018, PG&E initiated the consolidation of the existing CARE and FERA landing pages, and intends to launch the combined landing page before the end of 2018 to increase FERA visibility. PG&E plans to conduct A/B testing on the combined landing page, such as different calls-to-action, button placement, and page layout to provide insight for future FERA enrollment optimization.

Customers who arrive on the CARE/FERA combined landing page can apply via the online application, or easily find links to printable versions of the CARE/FERA application. The online application is available in English, Spanish and Chinese, while printable versions are available in English, large print English, Spanish, Tagalog, Chinese, Vietnamese, Korean, Hmong and Russian. In addition to the application, most forms and fact sheets are available in multiple languages and large print.

¹⁷ PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Targetbase May 2018. The overall frequency for Residential customers with an online account is approximately 55 percent.

¹⁸ PEW Research Center. Mobile Fact Sheet. February 5, 2018. Survey data for U.S. adults with household income less than \$50,000. <http://www.pewinternet.org/fact-sheet/mobile>.

¹⁹ What is in WCAG 2.0, Web Accessibility Initiative <https://www.w3.org/WAI/intro/wcag>. October 19, 2016.

In 2017, PG&E implemented a CARE interstitial message (also known as a “pop-up” window) that appears when a customer who is flagged as CARE-eligible, unenrolled, logs into their online account. The customer is presented with a message promoting CARE and is encouraged to click a link to learn more. PG&E will evaluate the potential to edit the content of the existing interstitial to include FERA information. PG&E may also investigate a longer-term option of creating a FERA-eligibility flag in the system so that the interstitials generated can be specific to either CARE or FERA depending on the customer’s data attributes.

6.2 Increase Reach through Media Relations (Public Relations)

Media education and outreach is an integral component to increase the overall reach of PG&E marketing. Media relations tactics are a cost-effective way to drive additional reach and awareness of financial assistance programs and can be targeted to regions with low enrollment.

It is important to develop and distribute messages across a wide variety of channels to inform, educate, and generate awareness to the target audience. Media relations tactics may include:

- Incorporating FERA program information in media outreach campaigns to inform the media about financial assistance programs available to customers, particularly around months with higher usage in the summer and winter. Again, targeting counties in the Central Valley or zip codes with lower estimated FERA penetration rates.
- Partner with key in-language ethnic media partners to inform customers in their language, via vehicles that they trust.
- Training subject matter experts as spokespeople who can inform and engage customers, working in conjunction with local media.

6.3 Develop Broader Awareness of FERA Among PG&E Employees

PG&E has over 22,000 employees throughout our service area. These employees are well-positioned to act as the bridge between the company and its customers, and are often the best advocates. PG&E plans to include additional communications and training to ensure that employees and retirees understand the financial assistance programs and have the tools they need to discuss them with customers, family and friends. Employee education outreach may include the following:

- Expanded FAQs for employees
- Leveraging internal channels like the Daily Digest email to all employees or the intranet channel (PG&E@Work) to educate employees about FERA

6.4 Community Events / Local Offices

PG&E continues to support community events via CARE community outreach contractors and other requests made through PG&E's local offices and other channels. The criteria to support an event are as follows: free and open to the public, targets a high poverty/urban and/or hard-to-reach community, at least four hours, expects up to 200 attendees or more.

PG&E staff members Customer Service Office (CSO) outreach events throughout PG&E's territory to create awareness and provide education about the CARE, FERA, ESA and other assistance programs. These outreach events are staffed by Customer Service Representatives (CSRs) helping customers with questions and understanding their accounts and educating customers. CSRs provide information on Medical Baseline, Balanced Payment Plan, Large Print Bills, In-Language Bills, SmartRate and SmartAC to give customers comprehensive solutions to help manage their energy bills.

6.5 Contact Center Support

The Contact Center is one of PG&E's primary channels for providing one-to-one direct customer support. In order to leverage the opportunity to educate customers about FERA, as well as other assistance programs and rate plan options, PG&E continues to enhance training and resources. CSRs receive regular training updates about residential rate changes and assistance programs for low-income customers so that they can answer questions and offer support for managing bills and energy use. In addition to live agent support, an interactive voice response phone system uses numeric prompts to provide information about assistance programs and walks customers through the enrollment process using a series of questions.

The contact center supports hard-to-reach customers in their language of choice either by on-staff CSRs who speak Spanish or by leveraging the third-party language line to allow for customers to communicate in 200 languages. PG&E uses a tool called General Reference (GenRef) for up-to-date information about marketing campaigns so CSRs can answer questions if there are customer calls about communications.

6.6 Cooling Centers

PG&E's Cooling Centers program provides financial and informational support to select local government-operated cooling centers for the purposes of increasing participation among low-and fixed-income residents. PG&E's efforts include educating targeted customers on heat preparedness and publicizing the center locations and accessibility as well as providing cooling centers with information on assistance programs like CARE, FERA and ESA, in addition to energy management tools.

7. Implementation

The marketing and outreach team began additional data and insights review based on the directives in D. 18-08-013. Additions to media plans, revisions to campaign test architecture and new creative development are expected to begin in Q4 2018, with implementation of testing and media tactics to launch in the first half of 2019. PG&E plans to optimize the CARE/FERA campaigns on an ongoing basis as results from these tests become available.

Additionally, PG&E will propose FERA-specific outreach in its June 2019 budget request application for the 2021-2025 Low-Income programs. To the best of its ability, PG&E will incorporate results and lessons learned from its early marketing tests to increase FERA participation. However, PG&E is uncertain to what degree results of such early stage efforts might be available during spring 2019 when that budget application must be filed.

Furthermore, as noted in Community Outreach section above, PG&E will identify community based organizations in high FERA eligibility geographic areas in order to increase FERA enrollment in these areas. Outreach channels that may be used by community based organizations include, but are not limited to, community events, workshops, one-on-one client services and/or door-to-door campaigns. Outreach goals, including CARE/FERA enrollment, will be critical to this outreach.

8. Measurement and Metrics

One of the key components to success in meeting the 50 percent penetration rate goal by the end of 2023 will be ongoing testing. The initial direct mail and email test in 2019 will be structured so that key performance indicators (KPIs) such as email open rate, click-through rate, and enrollment rate can be analyzed. Measurement and

evaluation of the test will inform adjustments to tactical plans, creative production and budget allocations.

With a focus on affordability, PG&E also plans to track the marketing cost-per-acquisition to measure the cost-efficiency of the overall marketing plan. CARE marketing activity has been in place for many years, so programs have been refined and cost-efficiency gained. Because CARE and FERA will continue to be co-promoted, PG&E plans to evaluate marketing cost-per-acquisition based on total marketing spend, and total CARE and FERA marketing-driven enrollments, monitoring year-over-year changes.

PG&E's Low-Income M&O plan includes tracking of overall CARE awareness among the income eligible non-enrolled audience, and ESA program awareness among the target CARE-enrolled audience. CARE and ESA program awareness baselines are already established among these audiences, and updates are planned to occur biannually. PG&E plans to incorporate FERA in these customer tracking surveys to establish a baseline against which progress can be measured.

PG&E will explore tracking the number of new FERA and CARE enrollments as well as the number of customers interaction on FERA, other assistance programs, and energy management tools to measure the success of the community-based outreach.

9. Budget

This section includes a budget estimate for the incremental marketing and outreach activities PG&E expects to execute in 2018 – 2020 to support the goal of increasing FERA participation. Throughout the period ending in December 2020, PG&E will continue to evaluate and optimize marketing tactics to deliver the most effective and cost-efficient plan possible, and will revisit its budgets annually to ensure that projections manage both cost-effectiveness and overall program requirements.

PG&E's proposed budget for these incremental CARE/FERA M&O efforts will utilize unspent funds from the CARE marketing budget, with the expectation that overall budgets will not exceed the previously-authorized CARE budget.

PG&E is providing preliminary cost estimates for currently anticipated 2018 through 2020 activities to market to eligible customers in the FERA program. In the section below, PG&E has included estimates of PG&E's third-party contracts, and other costs relating to marketing activities that are to be recovered through the CARE program balancing accounts. The estimates include:

Table 4: Proposed Budget for Incremental CARE/FERA-Targeted Joint M&O Efforts,²⁰ Using Previously-Approved but Unspent CARE Marketing Funds

	2018	2019	2020	Total
CARE/FERA M&O proposed budget	\$129,200	\$1,083,300	\$811,100	\$2,023,600

PG&E will include FERA marketing and outreach budget for the period beyond 2020 in its upcoming 2021-2025 low-income program application, to be filed June 1, 2019.

10. Reporting

As required in D. 04-02-057, PG&E will continue to file an Annual Progress Report with the Commission on May 1st each year.

Additionally, in compliance with D. 18-08-013, PG&E will file information-only advice letters on PG&E’s progress to increase FERA enrollment with the CPUC’s Energy Division at the end of 2018, 2019, 2020, 2021, 2022 and 2023.

²⁰ Consistent with D.18-08-013, Ordering Paragraph 16.

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	Ellison Schneider & Harris LLP	Praxair
Alcantar & Kahl LLP	Energy Management Service	Regulatory & Cogeneration Service, Inc.
Anderson & Poole	Evaluation + Strategy for Social Innovation	SCD Energy Solutions
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Green Charge Networks	SPURR
Braun Blaising Smith Wynne P.C.	Green Power Institute	San Francisco Water Power and Sewer
CalCom Solar	Hanna & Morton	Seattle City Light
California Cotton Ginners & Growers Assn	ICF	Sempra Utilities
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Gas Company
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Keyes & Fox LLP	Sunshine Design
Cenergy Power	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Center for Biological Diversity	Linde	TerraVerde Renewable Partners
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Tiger Natural Gas, Inc.
City of San Jose	Los Angeles Dept of Water & Power	TransCanada
Clean Power Research	MRW & Associates	Troutman Sanders LLP
Coast Economic Consulting	Manatt Phelps Phillips	Utility Cost Management
Commercial Energy	Marin Energy Authority	Utility Power Solutions
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Specialists
Crossborder Energy	Modesto Irrigation District	Verizon
Crown Road Energy, LLC	Morgan Stanley	Water and Energy Consulting
Davis Wright Tremaine LLP	NLine Energy, Inc.	Wellhead Electric Company
Day Carter Murphy	NRG Solar	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	Office of Ratepayer Advocates	Yep Energy
Don Pickett & Associates, Inc.	OnGrid Solar	
Douglass & Liddell	Pacific Gas and Electric Company	