



**Pacific Gas and
Electric Company®**

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February 6, 2020

Advice 4212-G/5756-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Statewide ESA Policy and Procedures Manual Waiver for Contractor
to Distribute CARB Batteries to Qualifying ESA Customers**

Purpose

The purpose of this Tier 1 advice letter is to inform the Commission about clean battery storage units that will be provided to qualifying Energy Savings Assistance (ESA) customers at no cost to either the ESA customers or the ESA Program.

Background

In Quarter 4, 2019, the California Air Resources Board (CARB) approached PG&E about an ESA leveraging opportunity. CARB is leveling a penalty on a manufacturer that shipped diesel generators into CA. This manufacturer, as their fine, must now ship into California \$1.8M worth of clean battery storage units earmarked for vulnerable customers. CARB contacted PG&E to ask if this manufacturer could leverage the ESA Program to provide these units to PG&E vulnerable low income customers at low overhead costs. No costs would be borne by the ESA Program.

PG&E's ESA service provider has agreed to distribute and install these batteries to eligible ESA customers at a low overhead cost, allowing maximum funding to be directed at providing more clean battery storage units to customers.

Battery storage unit installation would occur while the ESA implementers are already in customer homes doing measure assessments for the customer's ESA participation. This battery installation work will be completed at no cost to the ESA Program, and PG&E ESA Program Managers will not manage this work. In the event there are claims of any kind against PG&E related to battery storage unit work performed by the ESA Service Provider for the battery storage units themselves, the Service Provider will indemnify, defend, and hold PGE harmless pursuant to the terms of this agreement.

To leverage installation of these CARB penalty battery storage units, PG&E is providing a limited waiver to its Service Provider overriding the Statewide ESA Policy & Procedures Manual (P&P Manual) prohibitions against performing and billing non-ESA work while providing ESA. The P&P Manual's Section 3.3.3 on "Other Work" reads:

3.3.3 Other Work

Only work directly associated with providing ESA Program authorized services to participating customers may be billed to the ESA Program. The Service Provider is prohibited from selling other services to the customer or charging the customer for any other service.²⁴

²⁴ This provision does not preclude the possibility of requiring a co-payment for the installation of one or more measures, if approved by the utility.

(Statewide ESA 2017-2020 Cycle P&P Manual, Final, revised October 2019, p.26)

On January 22, 2020, PG&E discussed this P&P Manual restriction against performing and billing non-ESA work with Energy Division (ED) staff. PG&E discussed whether it needed to provide a contract waiver to its Service Provider enabling them to perform this non-ESA service. ED agreed with PG&E's assessment that providing the CARB penalty battery storage units at no cost to the customer or the ESA Program does not conflict with P&P Manual Section 3.3.3. PG&E agreed to file a Tier 1 Advice Letter.

PG&E includes a contract waiver allowing its Service Provider to provide the ARB penalty battery storage units while performing ESA in-home assessments since the P&P Manual's Section 3.3.3 prohibits selling additional services to customers or billing them to the ESA Program, and the battery storage units are being provided at no cost to either the customer or the ESA Program. The original intent of this prohibition against performing other (non-ESA) work was to prevent contractors from selling additional services to "captive" low income customers while they were in their homes for the ESA Program. However the leveraging opportunity described herein would not be billed to the ESA Program, and does not involve selling additional services to customers who will receive the batteries at no cost.

PG&E is pleased to help support this effort since it provides emergency preparedness benefits at no cost to vulnerable customers impacted by extended power outage interruptions. Low income customers provided battery storage units will experience

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than February 26, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.1, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is February 6, 2020.

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.19-11-003, A.19-11-004, A.19-11-005, A.19-11-006, and A.19-11-

007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service Lists A.19-11-003, A.19-11-004, A.19-11-005, A.19-11-006, and A.19-11-007



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: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4212-G/5756-E

Tier Designation: 1

Subject of AL: Statewide ESA Policy and Procedures Manual Waiver for Contractor to Distribute CARB Batteries to Qualifying ESA Customers

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

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

Summarize differences between the AL and the prior withdrawn or rejected AL:

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: 2/6/20

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

Protests and 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:

Clear Form

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

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