

PUBLIC UTILITIES COMMISSION

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July 27, 2020

Advice Letter 4244-G-B/5816-E-B

Erik Jacobson
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SUBJECT: Pacific Gas and Electric Company's Emergency Consumer Protection Plan to Support Customers During the COVID-19 Pandemic Pursuant to Resolution M-4842

Dear Mr. Jacobson:

Advice Letter 4244-G-B/5816-E-B is effective as of March 04, 2020.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

Should any discrepancy or inconsistency be found in the provisions of approved advice letters (AL) 4227-G/5784-E and AL 4244-G/5816-E, please defer to latter for precedence

July 15, 2020

Advice 4244-G-B/5816-E-B

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Second Supplemental: Pacific Gas and Electric Company's
Emergency Consumer Protection Plan to Support Customers During
the COVID-19 Pandemic Pursuant to Resolution M-4842.**

Purpose

PG&E is supplementing Advice 4244-G-A/5816-E-A to clarify prior proposals based on Energy Division guidance. Specifically, this supplemental advice letter includes the following modifications and clarifications:

- Clarifies in Section D that PG&E defines small business customers according to Electric and Gas Rule 1:
 - Small business electric customers are all non-residential metered customers whose annual usage is equal to or less than 40,000 kWh or whose demand is equal to or less than 20kW
 - Small business gas customers are all non-residential metered customers whose usage does not exceed 10,000 therms annually
 - Non-residential customers are also small businesses if they meet the definition of a "micro-business" under California Government Code 14837.
- Clarifies in Section D that PG&E will only record uncollectibles for residential and small business customers to the COVID-19 Pandemic Protections Memorandum Accounts (CPPMA);
- Clarifies in Section D the nature of the financing costs PG&E requests to record to the CPPMA and how they support the required protections for residential and small business customers; and
- Removes language from its preliminary statements related to unpaid advances to Energy Savings Assistance program prime contractors.

This supplemental advice letter replaces the original advice letter in its entirety.

Background

On March 4, 2020, Governor Newsom declared a statewide emergency due to an outbreak of a respiratory illness caused by COVID-19. In response, PG&E suspended disconnections and implemented flexible payment plans for all residential and small business customers.

On March 19, 2020, PG&E submitted a Tier 1 advice letter, Advice 4227-G/5784-E, to implement the emergency consumer protection plan for customers experiencing a financial crisis due to COVID-19. PG&E submitted Advice 4227-G/5784-E pursuant to OP 1 of D.19-07-015 and as informed by the March 17, 2020, letter to the energy utilities from CPUC Executive Director Alice Stebbins. In the advice letter, PG&E proposed the following emergency customer protections for residential and small business customers within our service territory:

1. Suspending service disconnections for non-payment and waiving security deposits;
2. Implementing flexible payment plan options; and
3. Providing additional support for low-income and medical baseline customers.

On April 3, 2020, PG&E submitted a supplemental advice letter, Advice 4227-G-A/5784-E-A, which suspended all customer removals from the medical baseline program and allowed new applicants to enroll without a signed authorization from their medical practitioners due to COVID-19's impact on customers' ability to see their doctors.¹

On April 16, 2020, the Commission adopted Resolution M-4842, *Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic* directing utilities to offer the protections adopted in D.19-07-015 to all residential and small business customers through April 16, 2021, with an option to extend that date.² The Resolution recognizes that not all provisions adopted in D.19-07-015 may apply during a pandemic, and directs the utilities to explain why they believe any provisions do not apply.³

On May 1, 2020, PG&E submitted a Tier 2 Advice Letter, Advice 4244-G/5816-E, to implement an emergency consumer protection plan for customers who are experiencing a financial crisis due to the novel coronavirus (COVID-19) pandemic. PG&E submitted Advice 4244-G/5816-E pursuant to Ordering Paragraph (OP) 2 of Resolution M-4842.

Advice 4244-G/5816-E included the following clarifications and proposals:

¹ Note that PG&E submitted Advice 4227-G-B/5784-E-B on May 21, 2020 at the request of the Energy Division to clarify that customers do not need to self-certify that they are impacted by COVID-19 to receive customer protections.

² Resolution M-4842, p.4.

³ Resolution M-4842, p. 4.

1. PG&E clarified the applicable protections required by D.19-07-015 and explained why certain protections required by D.19-07-015 are not applicable to the COVID-19 pandemic.
2. PG&E established the new CPPMA and requested CPUC authorization to track and recover incremental costs associated with implementing customer protections
3. PG&E and the California Community Choice Association agreed on a proposal for PG&E to allocate partial payments received from residential CCA customers on a *pro rata* basis with CCAs for up to one year, through April 16, 2021, and to track any associated uncollectibles through the CPPMA for future recovery.

On June 2, 2020, PG&E submitted a supplemental advice letter, Advice 4244-G-A/5816-E-A to include two additional proposals and to modify and clarify prior proposals based on Energy Division guidance. Specifically, PG&E proposed:

- To allocate partial payments received from residential customers served by Energy Service Providers (ESPs) and Core Transport Agents (CTAs) on a *pro rata* basis with ESPs and CTAs for up to one year, through April 16, 2021, and track any associated uncollectibles through the CPPMA
- To track financing costs associated with COVID-19-related revenue collection delays in the CPPMA.

Based on Energy Division guidance, Advice 4244-G-A/5816-E-A also included the following modifications and clarifications:

- Removes PG&E's request for clarification from the Commission as to whether PG&E is permitted to track any uncollectibles associated with protections for medium and large commercial customers in the CPPMA for future recovery.
- Removes PG&E's request to record incremental costs that exceed unspent funds in the ESA program as it relates to advance prepayments to ESA Prime Contractors since the Commission addresses this issue in Resolution E-5074, adopted May 28, 2020.
- Adds a footnote to Section D to clarify that PG&E will track expenses associated with implementing COVID-19 customer protections by customer type to the extent possible
- Adds a footnote to Section D to clarify that PG&E will track uncollectibles associated with implementing COVID-19 customer protections by customer type to the extent possible
- Adds a footnote to Section D to clarify that PG&E included accounting procedures in its preliminary statements to allow both expenses and capital revenue requirements associated with capital costs to be recorded in the CPPMA in the event that these costs are incurred in order to implement Resolution M-4842.

Discussion

In this advice letter, PG&E clarifies which protections identified in Resolution M-4842 apply to residential and small business⁴ customers impacted by COVID-19 and explains why certain provisions do not apply. In addition, PG&E proposes to establish two memorandum accounts, one for gas and one for electric, to book costs associated with the required protections. Table 1 summarizes the applicability of the protections in Resolution M-4842 and is followed by further discussion of the implementation or applicability of certain provisions.

Table 1: Summary of Applicable Customer Protections

Customer Protection	PG&E Action
Waive deposit requirements for residential customers seeking to reestablish service for one year and expedite move in and move out service requests	None—N/A to COVID-19; see discussion in Section B below
Stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency	
Identify the premises of affected customers whose utility service has been disrupted or degraded, and discontinue billing these premises without assessing a disconnection charge	
Prorate any monthly access charge or minimum charges	
Implement payment plan options for residential customers	Implemented—see Advice 4227-G/5784-E
Suspend disconnection for nonpayment and associated fees; waive deposit and late fee requirements for residential customers	
Support low-income residential customers by: <ul style="list-style-type: none"> a) Freezing all standard and high-usage reviews for the California Alternative Rates for Energy (CARE) program eligibility for 12 months and potentially longer, as warranted 	
b) Contacting all community outreach contractors, the community-based organizations who assist in enrolling hard-to-reach low-income customers into CARE, to help better inform customers of eligibility changes	
c) Partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months	Implemented—see discussion in Section A below
d) Indicate how the energy savings assistance program can be deployed to assist customers	
Suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections	Implemented—see Advice 4227-G/5784-E
Discontinue generating all recertification and verification requests that require customers to provide their current income information	

⁴ Consistent with D.19-07-015, p. 51, Conclusion of Law 3, fn 146, PG&E has defined “small business” in “accordance with the utilities definition of ‘small business’ in their rules and tariffs.” Small business electric customers are all non-residential metered service customers whose annual usage is equal to or less than 40,000 kWh or whose demand is equal to or less than 20 kW, as further defined in PG&E’s Electric Rule 1. Small business gas customers are all non-residential metered customers whose usage does not exceed 10,000 therms annually, as further defined in PG&E’s Gas Rule 1. Non-residential customers are also identified as small businesses if they meet the definition of a “micro-business” under California Government Code 14837.

Customer Protection	PG&E Action
Offer repair processing and timing assistance and timely access to utility customers pursuant to Section 8386(c)(18)	None—N/A to COVID-19; see discussion in Section B below
Include customer protections as part of IOU community outreach and public awareness plans under Section 8386(c)(16)(b)	Implemented—see further discussion in Section A below
Meet and confer with the Community Choice Aggregators as early as possible to discuss their roles and responsibilities for each emergency customer protection	

A. Protections Applicable to Customers Impacted by the COVID-19 Pandemic

Advice 4227-G/5784-E details PG&E’s implementation of the following protections required by D.19-07-015 and Resolution M-4842:⁵

- Implementation of payment plan options for residential customers;
- Suspension of disconnection for nonpayment and associated fees;⁶
- Waiving deposit requirements for residential and small business customers;
- Providing additional support for low-income customers, which includes:
 - Suspending standard and high usage post-enrollment verification requests and preventing the removal of impacted customers with pending requests. Discontinuing all recertification and verification requests that require customers to provide their current income information.
 - Contacting all community-based organizations who assist in enrolling hard-to-reach low-income customers into CARE informing them of the eligibility changes.
 - Partnering with its Relief for Energy Assistance through Community Help (REACH) administrator to provide up to an additional \$100 in bill payment assistance to all impacted income-eligible customers in PG&E’s service territory who apply for the REACH program for the next 12 months

PG&E Continues to Support Low-Income Customers through the Energy Savings Assistance (ESA) Program

In addition to the protections described in Advice 4227-G/5784-E, PG&E continues to support low-income customers through the ESA program as required by D.19-07-015 and M-4842.⁷ However, in response to local, state, and federal governmental guidance and health directives related to COVID-19, PG&E notified all impacted ESA vendors on March 18, 2020, that it would suspend all customer outreach, enrollment, and installation activities in the ESA program that require face-to-face interactions. PG&E expects the following activities to continue during the suspension:

- Repair and replacement of water heaters and furnaces, which are critical to customer health and safety;

⁵ Resolution M-4842, page 5, Protections 5 through 9 and 11 through 12.

⁶ Please note that PG&E does not charge late fees.

⁷ Resolution M-4842, p. 5

- Mandatory post-installation safety inspections stemming from furnace replacements;
- Warranty issues pertaining to certain appliances (e.g. refrigerators); and
- Follow-up visits to mitigate hazardous inspection fails.

PG&E coordinated closely with its ESA program implementers and contractors, as well as the CPUC Energy Division to institute these program changes. PG&E will continue these coordination efforts to revisit this suspension as the COVID-19 emergency progresses.

To continue momentum of the ESA program and support its income-qualified customers, PG&E is testing a virtual customer enrollment approach for the ESA program that includes customer acquisition and energy education activities. Further, PG&E enhanced its marketing and outreach activities to help its income-qualified customers manage their energy use during these uncertain times. PG&E is also offering select ESA contractor trainings virtually to maintain a robust pipeline of ESA contractors.

In addition, PG&E is engaged with the Commission, other IOUs, and stakeholders in the Low-Income Proceeding (Applications 19-11-003 et al.), pursuant to the March 23, 2020 and April 7, 2020 letters from CPUC Executive Director Alice Stebbins (collectively “ESA Stebbins Letters”), to offer up to 60 days advance payment support for ESA contractors during the program suspension. As of April 21, 2020, PG&E’s ESA Prime Contractors accepted PG&E’s offer for advance payments related to COVID-19 for a subset of their sub-contractors who indicated interest in receiving the advance.

PG&E’s Proposal Regarding CCAs, CTAs, and ESPs

Resolution M-4842 requires the IOUs to “meet and confer with the Community Choice Aggregators (CCAs) as early as possible to discuss their roles and responsibilities for each emergency consumer protection.”⁸ PG&E met and conferred with the CCAs on April 28, 2020 to review and coordinate implementation of the applicable protections. PG&E also met with the CCAs on April 28, 2020 to discuss their protest of PG&E Advice 4227-G/5784-E.

CalCCA’s protest included the following recommendations:

1. All customer payments should be allocated to PG&E and CCAs in proportion to their unpaid charges;
2. Any deposits collected on a bill calculation including CCA charges should be applied to PG&E and CCA charges pro-rata;
3. PG&E should pursue collection actions on both its own and the CCAs’ behalf; and
4. The Commission should clarify that the CCAs will not be responsible for uncollectible PG&E account balances.

⁸ Resolution M-4842, p. 5.

PG&E submitted a reply to CalCCA's protest on April 15, 2020. In its reply, PG&E noted that CalCCA's proposal to allocate all customer payments to PG&E and CCAs in proportion to their unpaid charges may inadvertently impact customers that are unable to meet the terms of their payment plans. In addition, PG&E discussed how its current practice serves the policy goal of protecting customers from disconnection, as acknowledged by the Commission. PG&E stated that further analysis of potential impacts was needed and committed to continuing discussions with the CCAs to identify a potential solution.

As a result of these efforts, PG&E and CalCCA agree on a proposal for PG&E to suspend the allocation method for partial payments relating to past due accounts under Electric Rule 23.R.3 for a limited period due to COVID-19. According to this proposal, PG&E will allocate partial payments received from residential CCA customers on a *pro rata* basis with CCAs for up to one year, through April 16, 2021, and track any associated uncollectibles through the CPPMA for future recovery as described in Section D of this advice letter. PG&E will resume allocation of payments from residential CCA customers in accordance with Electric Rule 23.R.3 starting April 17, 2021. PG&E and CalCCA will monitor and meet to discuss any potential impacts this proposal may have on customers, and PG&E reserves the right to request modifications due to the uncertainty associated with the COVID-19 pandemic.

PG&E and CalCCA have resolved the second basis of CalCCA's protest. Customer deposits are not calculated based on the CCA portion of the bill and there is thus no basis for application of the deposits to CCA charges. PG&E and CalCCA will continue to discuss the third and fourth issues raised in CalCCA's protest to determine whether there are alternatives that would support CCA cost recovery through PG&E collections and uncollectible cost recovery processes.

On May 6, 2020, Just Energy Inc. (Just Energy) submitted a protest to Advice 4244-G/5816-E that recommends the Commission direct PG&E to submit a supplemental advice letter to extend PG&E's partial payments proposal to include ESPs.⁹ In addition, the Direct Access Customer Coalition (DACC) submitted a response to Advice 4244-G/5816-E requesting that PG&E submit a supplemental advice letter to clarify that it will separately track costs associated with uncollectibles for generation and transmission/distribution customers in the CPPMA and stating in their response that the incremental costs created by the agreement with CalCCA should be allocated to CCA customers.¹⁰

PG&E submitted a response to Just Energy and DACC on May 11, 2020 that indicated PG&E would submit a supplemental advice letter to extend its partial payments proposal to include all residential customers served by third-party providers.

⁹ Just Energy Solutions Inc.'s Protest of PG&E's AL 4244-G/5816-E, p. 1.

¹⁰ Response of the Direct Access Customer Coalition to Pacific Gas and Electric Advice Letter 4244-G/5816-E, pp. 1-2.

Accordingly, PG&E proposes to suspend the allocation method for partial payments relating to past due accounts under Electric Rule 22.M.1.c for residential ESP customers and Gas Rule 23.G.1.c.5.c. for Core Transport Agent (CTA) residential customers for a limited period due to COVID-19. Specifically, PG&E proposes to allocate partial payments received from residential customers served by ESPs and CTAs on a *pro rata* basis with ESPs and CTAs for up to one year, through April 16, 2021. PG&E will resume allocation of payments from residential ESP and CTA customers in accordance with Electric Rule 22.M.1.c and Gas Rule 23.G.1.c.5.c starting April 17, 2021. This proposal is consistent with PG&E's proposal to allocate partial payments from residential CCA customers, as described in Advice 4244-G/5816-E.

Furthermore, as a general matter, when PG&E seeks recovery of the costs that are tracked in the CPPMA, PG&E agrees that its cost allocation proposals will follow the principle that costs should be allocated to those customers on whose behalf the costs were incurred.

PG&E's Communication Plan Complies with Resolution M-4842, Ordering Paragraph (OP) 6

PG&E is complying with Resolution M-4842 by conducting community awareness and public outreach to help raise awareness on the customer protections available to customers.

Resolution M-4842, OP 6 requires the electric utilities to conduct community awareness and public outreach consistent with the requirements in D.19-07-015 and D.20-03-004. PG&E describes its communication plan and compliance with the requirements in D.19-07-015 and D.20-03-004 in further detail below.

First, D.19-07-015 requires PG&E to "include these customer protections as part of their larger community outreach and public awareness plans under Section 8386(c)(16)(b)."¹¹ PG&E clarifies that Section 8386(c) refers to PG&E's Wildfire Mitigation Plans and that Section 8386(c)(16)(b) relates specifically to how the awareness and outreach activities discussed in the Wildfire Mitigation Plans align with PG&E's Emergency Consumer Protection Plan. PG&E included this discussion in its 2020 Wildfire Mitigation Plan.¹²

Second, D.19-07-015 provides direction on the IOUs consumer protections awareness and outreach activities, including requirements for in-language engagement. Specifically, D.19-07-015 states that the IOUs have "the ability and flexibility to utilize various means to create a mix of tactics used at strategic times to reach customers and aid them in their understanding of these programs."¹³ It also requires the IOUs to conduct outreach in the three most common languages used in the state other than English or Spanish, which are

¹¹ D.19-07-015, Conclusion of Law 16.

¹² PG&E 2020 Wildfire Mitigation Plan, pp. 2-232 to 2-235.

¹³ D.19-07-015, p. 36.

Chinese (including Cantonese, Mandarin and other Chinese languages), Tagalog, and Vietnamese, as well as in Korean and Russian where those languages are prevalent.¹⁴ In addition, D.20-03-004 requires the IOUs to demonstrate by May 15, 2020 that they conduct community awareness and public outreach before, during, and after a wildfire in any language that is “prevalent” in its service territory, which is defined as a language that is spoken by 1,000 or more people.¹⁵

In compliance with these requirements, PG&E Advice 4227-G/5784-E describes PG&E’s tactics to inform customers of the support available to them due to the COVID-19 epidemic. Our plan includes a variety of tactics, such as providing a dedicated website that describes the available protections and eligibility requirements, issuing a press release to obtain earned media, providing social media communications, sending emails to customers, and ensuring information is made available through PG&E’s call center support.

In addition, PG&E is supporting customers during the COVID-19 pandemic through in-language outreach as described in Advice 4139-G/5630-E. For example, its COVID-19 website can be accessed in the required languages and PG&E’s call centers can provide in-language support as needed. Moreover, PG&E will implement awareness and outreach activities in the languages described in its emergency communications workplan that PG&E submitted in compliance with D.20-03-004.¹⁶

B. Protections Not Applicable to Customers Impacted by the COVID-19 Pandemic

The Resolution recognizes that not all provisions adopted in D.19-07-015 may apply during a pandemic and directs the utilities to explain why they believe any provisions do not apply.¹⁷ PG&E agrees that certain protections required by D.19-07-015 and initially adopted in Resolution M-4833 are not applicable to COVID-19 because they address situations where structural damage and/or evacuations occurred. PG&E identifies and describes the non-applicability of these protections in further detail below.

Waive deposit requirements for residential customers seeking to re-establish service for one year and expedite move in and move out service requests

Resolution M-4833 requires the IOUs to waive deposit requirements for customers impacted by an emergency because deposits can be “a major hurdle for evacuees trying to transition from shelters, other temporary housing arrangements, and uninhabitable homes to more permanent housing.”¹⁸ Although PG&E believes this protection is intended

¹⁴ D.19-07-015, pp. 36-37.

¹⁵ D.20-03-004, OP 1.

¹⁶ See Advice 4249-G/5827-E, submitted May 15, 2020.

¹⁷ Resolution M-4842, p. 4.

¹⁸ Resolution M-4833, p. 5.

to support customers that are displaced due to a natural disaster, PG&E clarifies that it is already waiving deposit requirements as described in Advice 4227-G/5784-E.

Furthermore, Resolution M-4833 states that expediting move in and move out requests supports “customers who are returning to their homes and establishing service in new locations.”¹⁹ Similarly, PG&E believes this protection is not applicable to COVID-19 because it supports customers that were evacuated or lost their homes and require service in a new location. PG&E clarifies that customers will not be disconnected for non-payment as a result of COVID-19.

Stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency

Resolution M-4833 directs the IOUs to “recalibrate their approach for estimating usage to account for reduced consumption during the period of time the home/unit was unoccupied.”²⁰ This protection is applicable during natural disasters because PG&E can identify general areas that were evacuated and recalibrate their approach for any bills in the area requiring estimation. However, PG&E is unable to identify specific areas that may be unoccupied due to the dynamic, widespread nature of COVID-19. As a result, PG&E does not believe this protection is applicable to COVID-19.

Identify the premises of affected customers whose utility service has been disrupted or degraded and discontinue billing these premises without assessing a disconnection charge

During a natural disaster, PG&E can identify customers whose service was disrupted or degraded and discontinue billing these premises. However, PG&E believes that this protection is not applicable to the COVID-19 because the pandemic is not disrupting or degrading utility service.

Prorate any monthly access charge or minimum charges

PG&E believes that this protection is not applicable because it is relevant to time periods in which customers’ homes and/or businesses are rendered unserviceable by a disaster, which PG&E does not believe occurred as a result of the COVID-19 pandemic.

Offer repair processing and timing assistance and timely access to utility customers pursuant to Section 8386(c)(18)

Following a wildfire or other natural disaster, PG&E utilizes its existing repair and rebuild process and works with the impacted community to communicate priorities and timelines for repairs and restoration, prioritizing repairs for customers impacted by the disaster.

¹⁹ Resolution M-4833, p. 5.

²⁰ Resolution M-4833, p. 6.

PG&E believes that this protection is not applicable to the COVID-19 pandemic because this emergency is not causing structural damages that require repair and rebuild efforts.

Due to the fluid nature of the COVID-19 pandemic, PG&E will evaluate requests for the protections listed above on a case-by-case basis and reserves the right to submit an advice letter for the inclusion of such provisions for customer impacted by the pandemic.

C. Additional Protections to Assist Customers Impacted by the COVID-19 Pandemic

D.19-07-015, OP 1 states, “Nothing in this Decision bars or otherwise prohibits utilities from implementing their own disaster assistance programs to supplement these adopted emergency customer protections.” Accordingly, PG&E is offering the additional protections described below in response to the COVID-19 pandemic.

Support for Medical Baseline Customers

Due to COVID-19’s unique impact on customers’ ability to see their medical practitioners, Advice 4227-G-A/5784-E-A and Advice 4227-G-B/5784-E-B describe the following additional protections for customers that are currently enrolled or intend to enroll in the medical baseline program.

- Allowing customers to indicate their eligibility to enroll in the medical baseline program without a signature from a qualified medical professional.
- Suspending all customer removals from the medical baseline program.
- No longer sending forms to customers that require them to re-certify for the medical baseline program through a doctor or other eligible medical professional.

In addition to these protections, PG&E is engaged in other ongoing Commission proceedings to support customers impacted by COVID-19.

Supporting Customers Facing Prolonged Planned Outages

PG&E recognizes the importance of continuous service while customers face potential quarantines and during the Governor’s Stay at Home order. As such, PG&E has temporarily reduced planned customer outages so that our resumption of additional field work does not impose extra burdens upon our customers and neighbors. But the need to ensure customer safety—particularly during the upcoming wildfire season—does necessitate some outages for ongoing maintenance, repairs, and system upgrades. To the extent that PG&E generates at the system-level or provides back up generation to customers impacted by prolonged planned outages during the COVID-19 pandemic emergency, PG&E proposes to track incremental associated costs in the CPPMA.

D. COVID-19 Pandemic Protections Memorandum Accounts (CPPMA)

Pursuant to the Resolution,²¹ PG&E will record costs associated with these customer protections in the CPPMAs.²² Costs beginning March 4, 2020, are eligible to be recorded to these memorandum accounts.²³ Eligible costs previously recorded in the Emergency Customer Protections Memorandum Account (ECPMA) associated with the COVID-19 pandemic will be transferred to the CPPMAs. Pursuant to the Resolution, PG&E will seek recovery of these costs in a future cost recovery proceeding such as a General Rate Case, Cost Allocation Proceeding, the Energy Resource Recovery Account, or another proceeding.²⁴ The costs being recorded in the CPPMA will be limited to residential and small business customers as defined in Electric and Gas Rule 1 (i.e. small business electric customers are all non-residential metered customers whose annual usage is equal to or less than 40,000 kWh or whose demand is equal to or less than 20kW and small business gas customers are all non-residential metered customers whose usage does not exceed 10,000 therms annually).

Incremental COVID-19 Costs Impacting PG&E Related to Uncollectibles Expense for Residential and Small Business Customers

Pursuant to direction from the Energy Division provided to PG&E during a meeting on COVID-19,²⁵ PG&E requests to record uncollectibles expenses for residential and small business customers incremental to the amounts authorized in the General Rate Case (GRC) to the new memorandum accounts, which are related to the COVID-19 pandemic. Currently, uncollectibles expenses authorized to be recovered from customers through the GRC are based on a rolling 10-year average of recorded net write-offs of billing to customers that were not paid. PG&E did not propose changes to the currently adopted derivation of uncollectibles expense in its 2020 GRC. As part of its existing process, PG&E submits an advice letter with the Commission annually detailing its derivation of the following years uncollectibles factor, or amount, to be added to all applicable billings

²¹ See Resolution M-4842, OP4, p. 12.

²² PG&E's accounting policies will be applied to the costs recorded to the CPPMA to determine expense or capitalization treatment. These policies apply to property, plant, and equipment as well as computer software. Lifespan, inclusion in the Retirement Unit Catalog, and exceeding a minimum material cost per unit, are among the main determining factors. However, some situations are very specific and require additional analysis and judgement in determining the cost categorization. PG&E has included in its preliminary statements accounting procedures to allow both expense and capitalized costs to be recorded into the CPPMA in the event that these costs are incurred in order to implement Resolution M-4842. Furthermore, to the extent possible, PG&E will attempt to track the costs associated with these protections by customer type.

²³ Resolution M-4842, OP 1.

²⁴ Resolution M-4842, p. 6.

²⁵ PG&E met with the Energy Division on April 14, 2020.

to customers.²⁶ Additionally, any incremental uncollectibles expenses recovered through the new memorandum accounts would be excluded from the recorded net write-offs used to derive the 10-year rolling average uncollectibles factor and thereby would not subsequently be recovered through the GRC.

As a result of implementing the customer protection measures adopted by Resolution M-4842 and Governor Newsom's March 4 state of emergency declaration, PG&E anticipates that it may incur incremental financing costs beyond the commercial paper rates typically applied to revenue under-collections in memorandum or balancing accounts. For example, PG&E may incur cash flow shortfalls that would require it to borrow against its short-term revolver credit facility. The costs of utilizing this credit facility include the upfront costs to establish it, as well as monthly interest expense on amounts borrowed, estimated to be approximately 1.75 - 2.25% per year on the incremental cash flow shortfalls. Therefore, PG&E proposes to track the costs of utilizing a short-term revolving credit facility for purposes of financing residential and small business cash flow shortfalls resulting from implementation of the customer protection measures adopted by Resolution M-4842 and Governor Newsom's March 4 state of emergency declaration, in the gas and electric CPPMA.

In addition, on June 16, 2020, the Commission issued in Rulemaking (R.) 18-07-005, the *Phase I Decision Adopting Rules and Policy Changes to Reduce Residential Customer Disconnections for the Larger California-Jurisdictional Energy Utilities* (D. 20-06-003). In D. 20-06-003, the Commission requires the IOUs to "establish two-way balancing accounts to create more transparency and accurately reflect the actual costs of uncollectible charges in rates."²⁷ D.20-06-003 also states that the IOUs "may submit Tier 2 Advice Letters to address the issue of transferring the portion of their COVID-19 Pandemic Protections Memorandum Account related to uncollectibles from residential disconnections into the two-way balancing account."²⁸ PG&E acknowledges this proposal as it relates to tracking the actual costs of uncollectibles,²⁹ and requests that the Commission approve its proposals related to the CPPMA in this Supplemental Advice 4244-G-B/5816-E-B so that PG&E can immediately track costs associated with the COVID-19 pandemic.

Support for Energy Savings Assistance Program Prime Contractors

On May 28, 2020, the Commission adopted Resolution E-5074, relating to the Stebbins Letters directing PG&E to offer advance prepayments to ESA Prime Contractors. Resolution E-5074 states, "in the event that the IOUs anticipate incurring costs as a result

²⁶ PG&E's 2019 factor was approved through Advice 4020-G/5389-E. The 2020 uncollectibles factor of 0.003263 is pending approval as part of PG&E's 2020 GRC decision in Application 18-12-009.

²⁷ D. 20-06-003, OP 89.

²⁸ D. 20-06-003, OP 92.

²⁹ PG&E will track uncollectibles by customer type to the extent possible.

of advance payments that the existing ESA balancing account will not have sufficient funds to cover, the IOUs should submit a Tier 2 Advice Letter for tracking those costs associated with complying with this Resolution in the COVID-19 memorandum accounts as set out by Resolution M-4842.”³⁰ PG&E will comply with this Resolution.

Tariff Revisions

PG&E has consolidated all of the tariff revisions from Advice 4244-G/5816-E, 4244-G-A/5816-E-A, and 4244-G-B/5816-E-B in this supplemental advice letter and collectively seeks to make the following modifications to our tariffs.

- **Electric Rule 1, *Definitions*** –
 - Adding new footnote that states that pursuant to Resolution M-4842 the consumer protections associated with the COVID-19 pandemic are extended through April 16, 2021.
 - Adding this advice letter as a reference to existing footnote which states that only applicable measures of the Emergency Consumer Protection Plan are available to customer impacted by the COVID-19 pandemic.
- **Electric Rule 22 – *Direct Access***
 - Add footnote to Section M.1.c of Electric Rule 22 that states “Due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section M.1.c of Electric Rule 21 and will allocate partial payments received from residential ESP customers on a pro rata basis with ESPs for up to one year, through April 16, 2021, as described in Advice 4244-G-A/ 5516-E-A.”
- **Electric Rule 23 – *Community Choice Aggregation Service***
 - Adding new footnote to Section R.3 of Electric Rule 23 that notes that due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section R.3 of Electric Rule 23 and will allocate partial payments received from residential CCA customers on a pro rata basis with CCAs for up to one year, through April 16, 2021, as described in Advice 4244-G/ 5516-E.
- **Electric Preliminary Statement HG - *Emergency Consumer Protections Memorandum Account - Electric (ECPMA-E)***
 - Delete language associated with COVID-19 Pandemic event which has been transferred to the new COVID-19 Pandemic Protections Memorandum Account (CPPMA).
- **Electric Preliminary Statement ID - *COVID-19 Pandemic Protections Memorandum Account – Electric (CPPMA-E)***

³⁰ Resolution E-5074, adopted May 28, 2020, p. 13.

- Establishing a new memorandum account pursuant to Resolution M-4842, to track and record costs associated with the consumer protections offered during COVID-19 pandemic.
- Adding “A debit entry equal to the pro rata cost of the associated credit facilities, including upfront and drawn interest expense on residential and small business incremental COVID-19 related revenue shortfalls” line item to Section 5, Accounting Procedures.
- Removing “A debt entry equal to incremental costs (exceeding PG&E’s unspent funds in the ESA program) related to unpaid advances to program prime contracts” line item in Section 5, Accounting Procedures
- Clarifying in Section 2, Applicability that small business electric customers are defined per Electric Rule 1.
- **Gas Rule 1, *Definitions***
 - Adding new footnote that states that pursuant to Resolution M-4842 the consumer protections associated with the COVID-19 pandemic are extended through April 16, 2021.
 - Adding this advice letter as a reference to existing footnote which states that only applicable measures of the Emergency Consumer Protection Plan are available to customer impacted by the COVID-19 pandemic.
- **Gas Rule 23 – *Gas Aggregation Service for Core Transport Customers***
 - Add footnote to Section G.1.c.5.c of Gas Rule 23 that states “Due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section G.1.c.5.c of Gas Rule 23 and will allocate partial payments received from residential CTA customers on a pro rata basis with CTAs for up to one year, through April 16, 2021, as described in Advice 4244-G-A/ 5516-E-A.”
- **Gas Preliminary Statement EC - Emergency Consumer Protections Memorandum Account - Gas (ECPMA-G)**
 - Delete language associated with COVID-19 Pandemic event which has been transferred to the new COVID-19 Pandemic Protections Memorandum Account (CPPMA).
- **Gas Preliminary Statement FF- COVID-19 Pandemic Protections Memorandum Account – Gas (CPPMA-G)**
 - Establishing a new memorandum account pursuant to Resolution M-4842, to track and record costs associated with the consumer protections offered during COVID-19 pandemic.
 - Adding “A debit entry equal to the pro rata cost of the associated credit facilities, including upfront and drawn interest expense on residential

and small business incremental COVID-19 related revenue shortfalls” line item to Section 5, Accounting Procedures.

- Removing “A debt entry equal to incremental costs (exceeding PG&E’s unspent funds in the ESA program) related to unpaid advances to program prime contracts” line item in Section 5, Accounting Procedures
- Clarifying in Section 2, Applicability that small business gas customers are defined per Gas Rule 1.

The affected tariff sheets are listed on the enclosed Attachment 1. For the convenience of the reader, PG&E has provided redline version of the revised tariffs in Attachment 2.

Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

In order to provide immediate assistance and customer protections, Resolution M-4842 required electric and gas utilities to request a waiver or a shortened protest and reply period of five days,³¹ PG&E is requesting a shortened protest period of five days. Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than July 20, 2020, which is five 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:

³¹ Resolution M-4842, p. 6.

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 and OP 2 of Resolution M-4842, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on March 4, 2020 the date of the Governor's declaration of a State of Emergency. In order to provide immediate assistance and customer protections in Resolution M-4842,³² PG&E requests expedited treatment of this advice letter.

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 R.18-03-011. 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

³² Resolution M-4842, p. 6.

Attachments

cc: Service List R.18-03-011



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 U39 M)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 4244-G-B/5816-E-B

Tier Designation: 2

Subject of AL: Second Supplemental: Pacific Gas and Electric Company's Emergency Consumer Protection Plan to Support Customers During the COVID-19 Pandemic Pursuant to Resolution M-4842.

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 #: M-4842

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: 3/4/20

No. of tariff sheets: 20

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: See Attachment 1

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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
36015-G	GAS PRELIMINARY STATEMENT PART EC EMERGENCY CONSUMER PROTECTIONS MEMORANDUM ACCOUNT - GAS (ECPMA-G) Sheet 2	35739-G
36016-G	GAS PRELIMINARY STATEMENT PART FF COVID-19 PANDEMIC PROCTIONS MEMORANDUM ACCOUNT (CPPMA) Sheet 1	
36017-G	GAS PRELIMINARY STATEMENT PART FF COVID-19 PANDEMIC PROCTIONS MEMORANDUM ACCOUNT (CPPMA) Sheet 2	
36018-G	GAS RULE NO. 1 DEFINITIONS Sheet 9	35740-G
36019-G	GAS RULE NO. 23 GAS AGGREGATION SERVICE FOR CORE TRANSPORT CUSTOMERS Sheet 26	34663-G
36020-G	GAS TABLE OF CONTENTS Sheet 1	35969-G
36021-G	GAS TABLE OF CONTENTS Sheet 6	35936-G
36022-G	GAS TABLE OF CONTENTS Sheet 7	35853-G
36023-G	GAS TABLE OF CONTENTS Sheet 8	35199-G
36024-G	GAS TABLE OF CONTENTS Sheet 9	35017-G

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
46830-E	ELECTRIC PRELIMINARY STATEMENT PART HG EMERGENCY CONSUMER PROTECTIONS MEMORANDUM ACCOUNT - ELECTRIC (ECPMA-E) Sheet 2	46342-E
46831-E	ELECTRIC PRELIMINARY STATEMENT PART ID COVID-19 PANDEMIC PROCTIONS MEMORANDUM ACCOUNT (CPPMA) Sheet 1	
46832-E	ELECTRIC PRELIMINARY STATEMENT PART ID COVID-19 PANDEMIC PROCTIONS MEMORANDUM ACCOUNT (CPPMA) Sheet 2	
46833-E	ELECTRIC RULE NO. 1 DEFINITIONS Sheet 15	46343-E
46834-E	ELECTRIC RULE NO. 22 DIRECT ACCESS Sheet 53	30915-E
46835-E	ELECTRIC RULE NO. 23 COMMUNITY CHOICE AGGREGATION SERVICE Sheet 46	42012-E
46836-E	ELECTRIC TABLE OF CONTENTS Sheet 1	46737-E
46837-E	ELECTRIC TABLE OF CONTENTS Sheet 17	46682-E
46838-E	ELECTRIC TABLE OF CONTENTS Sheet 18	46738-E
46839-E	ELECTRIC TABLE OF CONTENTS Sheet 20	46400-E



GAS PRELIMINARY STATEMENT PART EC Sheet 2
EMERGENCY CONSUMER PROTECTIONS MEMORANDUM ACCOUNT - GAS (ECPMA-G)

EC. Emergency Consumer Protections Memorandum Account - Gas (ECPMA-G)

1. PURPOSE (Continued):

- G. **February 2019 Winter Storms** - State of emergency proclamations were issued on February 21, 2019 and February 28, 2019 due to winter storms for the following counties within PG&E service territory: Amador, Calaveras, El Dorado, Glenn, Humboldt, Lake, Marin, Mendocino, Monterey, San Mateo, Santa Barbara, Santa Clara, Shasta, Sonoma, Tehama, Trinity and Yolo counties. As ordered by D.18-08-004, eligibility for PG&E's Emergency Consumer Protection Plan, as defined in Rule 1, is extended to customers in these counties affected by the 2019 winter storms for a period of one year, or until PG&E service is restored, commencing from the date the proclamation is issued.
- H. **February 2019 Winter Storms** – A state of emergency proclamations was issued on April 12, 2019 due to the winter storms adding the following counties within PG&E service territory: Butte, Colusa, Mariposa, Napa, Santa Cruz, Solano and Tuolumne counties. As ordered by D.18-08-004, eligibility for PG&E's Emergency Consumer Protection Plan, as defined in Rule 1, is extended to customers in these counties affected by the 2019 winter storms for a period of one year, or until PG&E service is restored, commencing from the date the proclamation is issued.
- I. **July 2019 Ridgecrest Earthquake** – A state of emergency proclamation was issued on July 4 and July 5, 2019, for Kern and San Bernardino Counties respectively, due to an earthquake that was centered near the City of Ridgecrest. As ordered by D.18-08-004, eligibility for PG&E's Emergency Consumer Protection Plan, as defined in Rule 1, is extended to customers in these counties affected by the July 2019 Ridgecrest earthquake for a period of one year, or until PG&E service is restored, commencing from the date the proclamation is issued.
- J. **October 2019 Kincadee Wildfire** – A state of emergency proclamation was issued on October 25, 2019 for Sonoma County due to the wildfire. As ordered by D.19-07-015 eligibility for PG&E's Emergency Consumer Protection Plan, as defined in Rule 1, is extended to customers in the county impacted by the disaster for a period of one year, or until PG&E service is restored, commencing from the date the proclamation is issued.

(D)
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(D)

(Continued)

Advice Decision 4244-G-B

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted Effective Resolution

July 15, 2020



GAS PRELIMINARY STATEMENT PART FF
COVID-19 PANDEMIC PROCTIONS MEMORANDUM ACCOUNT (CPPMA)

Sheet 1

FF- COVID-19 Pandemic Protection Memorandum Account – Gas (CPPMA-G)

(N)

1. **PURPOSE:** The purpose of the COVID-19 Pandemic Protection Memorandum Account (CPPMA) is to record and track incremental gas costs associated with implementing the Disaster Relief Rulemaking (R.18-03-011) related to the COVID-19 Pandemic as described in Resolution M-4842. Applicable costs include customer protection costs and any other costs approved to be recorded in this account associated with the COVID-19 Pandemic period, which began on March 4, 2020, as authorized by the Commission. Costs that can be attributed specifically to gas service will be recorded to this account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas.
2. **APPLICABILITY:** The CPPMA applies to residential and small business gas customers. Small business gas customers are defined per Gas Rule No. 1.
3. **REVISION DATE:** Disposition of the balances in this account will be addressed in a future cost recovery proceeding such as a General Rate Case, Cost Allocation Proceeding, or another proceeding, or as otherwise authorized by the Commission.
4. **RATES:** The CPPMA does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the CPPMA by making the following entries (excluding 5c), net of Revenue Fees and Uncollectibles (RF&U), to the account at the end of each month, or as applicable:
 - a. A debit entry equal to the actual incremental expenses associated with the customer protections applicable to PG&E and described in Resolution M-4842 as authorized by the Commission to be recorded to this account;
 - b. A debit entry equal to the waived charges associated with customer protection compliance;
 - c. A debit entry equal to the incremental uncollectible expenses during the COVID-19 Pandemic period;
 - d. A debit or credit entry equal to the capital-related revenue requirement related to the actual capital costs incurred if any. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - e. A debit entry equal to the pro rata cost of the associated credit facilities, including upfront and drawn interest expense on residential and small business incremental COVID-19 related revenue shortfalls;

(N)

(Continued)

Advice 4244-G-B
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

July 15, 2020



GAS PRELIMINARY STATEMENT PART FF Sheet 2
COVID-19 PANDEMIC PROCTIONS MEMORANDUM ACCOUNT (CPPMA)

FF- COVID-19 Pandemic Protection Memorandum Account – Gas (CPPMA-G) (Cont'd)

(N)

5. ACCOUNTING PROCEDURE: (Cont'd)

- f. A debit entry equal to any other costs authorized by the Commission to be recorded to this account;
- g. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and
- h. An entry, as appropriate, each month equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, excluding entry 5.e., at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)



GAS RULE NO. 1
DEFINITIONS

Sheet 9

EMERGENCY CONSUMER PROTECTION PLAN: (Cont'd)

Date of Proclamation	Disaster Name	Affected County
April 12, 2019	February 2019 Winter Storms	Butte, Colusa, Mariposa, Napa, Santa Cruz, Solano and Tuolumne
July 4 & 5, 2019	July 2019 Ridgecrest Earthquake	Kern and San Bernardino
October 25, 2019	Kincadee Wildfire	Sonoma
March 4, 2020	COVID-19 Pandemic ^{3, 4}	All Counties throughout PG&E territory

(T)

³ Pursuant to CPUC Resolution M-4842 the consumer protections associated with the COVID-19 pandemic are extended through April 16, 2021.

(N)
(N)

⁴ Due to the special circumstances of COVID-19 pandemic only applicable measures of the Emergency Consumer Protection Plan were available to impacted customers per Advice 4227-G/ 5784-E and Advice 4244-G-A/5816-E-A.

(T)
|
(T)

(Continued)



GAS RULE NO. 23

Sheet 26

GAS AGGREGATION SERVICE FOR CORE TRANSPORT CUSTOMERS

G. BILLING AND PAYMENT (Cont'd.)

1. BILLING (Cont'd.)

c. OPTIONAL CONSOLIDATED PG&E BILLING (Cont'd.)

5) Late or Partial Payments and Unpaid Bills

- a) PG&E is responsible for collecting the unpaid balance of all charges from Customers, sending notices informing Customers of unpaid balances, and taking the appropriate actions to recover the unpaid amounts owed the CTA.
- b) Except as provided below in Section c), if a Customer makes only a partial payment for a service account, the payment will be allocated proportionally between PG&E's charges and the CTA's charges. A Customer may dispute these charges as provided in Section 4.e), above, but will not otherwise have the right to direct partial payments for a particular service account. (Utility Users Taxes will be treated in accordance with current utility procedures and are not subject to this section.)
- c) In evaluating a delinquent residential service account for service termination and to the extent required by law or CPUC regulations, partial payments will be allocated first to delinquent charges that may result in discontinuance of service as specified in Rule 11.* (T)
- d) Undisputed overdue balances owed PG&E will be considered late and subject to PG&E late payment procedures.
- e) PG&E rules will apply to late or non-payment of PG&E charges by the Customer.

* Due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section G.1.c.5.c of Gas Rule 23 and will allocate partial payments received from residential CTA customers on a pro rata basis with CTAs for up to one year, through April 16, 2021, as described in Advice 4244-G-A/ 5516-E-A. (N)

(N)
|
(N)

(Continued)



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Advice Decision 4244-G-B

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted Effective Resolution July 15, 2020



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Rule 02	Description of Service..... 23062,23063,23064,23065,23066,33824-G	I
Rule 03	Application for Service..... 27248,27249-G	I
Rule 04	Contracts..... 17051-G	I
Rule 05	Special Information Required on Forms..... 30088,32872,32873-G	I
Rule 06	Establishment and Reestablishment of Credit..... 22126,30687,34524-G	I
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Rule 11	Discontinuance and Restoration of Service34867,34868,34052,34053,33494,33878,	I
Rule 12	Rates and Optional Rates 18229,27253,24132,21981,21982,34520-G	I
Rule 13	Temporary Service 22832-G	I
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Rule 19	Medical Baseline Quantities..... 21119,31932,21121-G	I
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Maps, Contracts and Deviations

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Sample Forms

79-1088	Supplemental Agreement For Limited Gas Transmission Capacity	30317-G
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Sample Forms

Rule 2 Description of Service

79-1049	Agreement to Install Applicant Requested Common Special Facilities	30035-G
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Sample Forms

Rule 3 Application for Service

02-2590	Continuous Service Agreement	33170*-G
62-3282	Request for Service	30756-G
62-0683	Application for Service-Residential Single Family Dwelling.....	30308-G
62-0684	Application for Service-Residential Subdivision/Development	29982-G
62-0685	Application for Service-Commercial/Industrial Development.....	29983-G
62-0686	Application for Service-Agricultural Service	29984-G
62-0687	Application for Service – Existing Service Relocate / Change Service	29985-G
79-255	Agreement for Installation or Allocation of Special Facilities	29991-G
79-1099	Property Management Authorization Agreement	30590-G

Sample Forms

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79-875	Rule 13 Temporary Service Agreement.....	30019-G
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(L)

(Continued)



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62-3481	Medical Baseline Allowance Application	35197-G

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01-9077	CARE/FERA Program Application for Residential Single-Family Customers.....	35829-G
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ELECTRIC PRELIMINARY STATEMENT PART HG Sheet 2
EMERGENCY CONSUMER PROTECTIONS MEMORANDUM ACCOUNT - ELECTRIC (ECPMA-E)

HG. Emergency Consumer Protections Memorandum Account - Electric (ECPMA-E)

1. PURPOSE (Continued):

- G. **February 2019 Winter Storms** - State of emergency proclamations were issued on February 21, 2019 and February 28, 2019 due to winter storms for the following counties within PG&E service territory: Amador, Calaveras, El Dorado, Glenn, Humboldt, Lake, Marin, Mendocino, Monterey, San Mateo, Santa Barbara, Santa Clara, Shasta, Sonoma, Tehama, Trinity and Yolo counties. As ordered by D.18-08-004, eligibility for PG&E's Emergency Consumer Protection Plan, as defined in Rule 1, is extended to customers in these counties affected by the 2019 winter storms for a period of one year, or until PG&E service is restored, commencing from the date the proclamation is issued.
- H. **February 2019 Winter Storms** – A state of emergency proclamations was issued on April 12, 2019 due to the winter storms adding the following counties within PG&E service territory: Butte, Colusa, Mariposa, Napa, Santa Cruz, Solano and Tuolumne counties. As ordered by D.18-08-004, eligibility for PG&E's Emergency Consumer Protection Plan, as defined in Rule 1, is extended to customers in these counties affected by the 2019 winter storms for a period of one year, or until PG&E service is restored, commencing from the date the proclamation is issued.
- I. **July 2019 Ridgecrest Earthquake** – A state of emergency proclamation was issued on July 4 and July 5, 2019, for Kern and San Bernardino Counties respectively, due to an earthquake that was centered near the City of Ridgecrest. As ordered by D.18-08-004, eligibility for PG&E's Emergency Consumer Protection Plan, as defined in Rule 1, is extended to customers in these counties affected by the July 2019 Ridgecrest earthquake for a period of one year, or until PG&E service is restored, commencing from the date the proclamation is issued.
- J. **October 2019 Kincadee Wildfire** – A state of emergency proclamation was issued on October 25, 2019 for Sonoma County due to the wildfire. As ordered by D.19-07-015 eligibility for PG&E's Emergency Consumer Protection Plan, as defined in Rule 1, is extended to customers in the county impacted by the disaster for a period of one year, or until PG&E service is restored, commencing from the date the proclamation is issued.

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(D)

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ELECTRIC PRELIMINARY STATEMENT PART ID
COVID-19 PANDEMIC PROCTIONS MEMORANDUM ACCOUNT (CPPMA)

Sheet 1

ID. - COVID-19 Pandemic Protection Memorandum Account – Electric (CPPMA-E)

(N)

1. **PURPOSE:** The purpose of the COVID-19 Pandemic Protection Memorandum Account (CPPMA) is to record and track incremental electric costs associated with implementing the Disaster Relief Rulemaking (R.18-03-011) related to the COVID-19 Pandemic as described in Resolution M-4842. Applicable costs include applicable customer protection costs and any other costs approved to be recorded in this account associated with the COVID-19 Pandemic period, which began on March 4, 2020, as authorized by the Commission. Costs that can be attributed specifically to electric service will be recorded to this account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas.
2. **APPLICABILITY:** The CPPMA applies to residential and small business electric customers. Small business electric customers are defined per Electric Rule No. 1.
3. **REVISION DATE:** Disposition of the balances in this account will be addressed in a future cost recovery proceeding such as a General Rate Case, Cost Allocation Proceeding, the Energy Resource Recovery Account, or another proceeding, or as otherwise authorized by the Commission.
4. **RATES:** The CPPMA does not have a rate component.
5. **ACCOUNTING PROCEDURES:** PG&E will maintain the CPPMA by making the following entries (excluding 5c), net of Revenue Fees and Uncollectibles (RF&U), to the account at the end of each month, or as applicable:
 - a. A debit entry equal to the actual incremental expenses associated with the customer protections applicable to PG&E and described in Resolution M-4842 as authorized by the Commission to be recorded to this account;
 - b. A debit entry equal to the waived charges associated with customer protection compliance;
 - c. A debit entry equal to the incremental uncollectible expenses during the COVID-19 Pandemic period;
 - d. A debit or credit entry equal to the capital-related revenue requirement related to the actual capital costs incurred if any. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - e. A debit entry equal to the pro rata cost of the associated credit facilities, including upfront and drawn interest expense on residential and small business incremental COVID-19 related revenue shortfalls;

(N)

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ELECTRIC PRELIMINARY STATEMENT PART ID Sheet 2
COVID-19 PANDEMIC PROCTIONS MEMORANDUM ACCOUNT (CPPMA)

ID. - COVID-19 Pandemic Protection Memorandum Account – Electric (CPPMA-E) (cont'd)

(N)

1. ACCOUNTING PROCEDURES: (cont'd)

- a. A debit entry equal to any other costs authorized by the Commission to be recorded to this account;
- b. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and
- c. An entry, as appropriate, each month equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, excluding entry 5.e., at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)

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ELECTRIC RULE NO. 1
DEFINITIONS

EMERGENCY CONSUMER PROTECTION PLAN: (Cont'd):

Date of Proclamation	Disaster Name	Affected County
April 12, 2019	February 2019 Winter Storms	Butte, Colusa, Mariposa, Napa, Santa Cruz, Solano and Tuolumne
July 4 & 5, 2019	July 2019 Ridgecrest Earthquake	Kern and San Bernardino
October 25, 2019	Kincadee Wildfire	Sonoma
March 4, 2020	COVID-19 Pandemic ^{9, 10}	All Counties throughout PG&E territory

(T)

ENERGY SUPPLY OR PROCUREMENT SERVICES: Includes, but is not limited to, procurement of electric energy; all scheduling, settlement, and other interactions with Scheduling Coordinators, and the ISO; all ancillary services and congestion management.

ENERGY SERVICE PROVIDER (ESP): An entity who provides electric supply services to Direct Access Customers within PG&E's service territory. An ESP may also provide certain metering and billing services to its DA Customers as provided for within these tariffs.

⁹ Pursuant to CPUC Resolution M-4842 the consumer protections associated with the COVID-19 pandemic are extended through April 16, 2021.

(N)
(N)

¹⁰ Due to the special circumstances of COVID-19 pandemic only applicable measures of the Emergency Consumer Protection Plan are available to impacted customers per Advice 4227-G/5784-E and Advice 4244-G-A/5816-E-A.

(T)
|
(T)

(Continued)



ELECTRIC RULE NO. 22
DIRECT ACCESS

M. LATE OR PARTIAL PAYMENTS AND UNPAID BILLS (Cont'd.)

1. Consolidated PG&E Billing (Cont'd.)

- b. Except as provided below in Section (c), if a customer makes only a partial payment for a Service Account, the payment will be allocated proportionally between PG&E's charges and the ESP's charges. A customer may dispute these charges as provided in Section L, but will not otherwise have the right to direct partial payments for a particular Service Account. (Utility Users Taxes will be treated in accordance with current utility procedures and are not subject to this section.)
- c. In evaluating a delinquent residential Service Account for service termination and to the extent required by law or CPUC regulations, partial payments will be allocated first to delinquent disconnectable charges. Uncollectible delinquent ESP charges will be reflected, as appropriate, in PG&E's account receivable bad debt adjustment procedure. * (T)
- d. Undisputed overdue balances owed PG&E will be considered late and subject to PG&E late payment procedures.
- e. CPUC rules will apply to late or non-payment of PG&E charges by the customer.

2. Under Consolidated ESP Billing

- a. The ESP is responsible for collecting both unpaid ESP and PG&E charges, sending notices informing customers of unpaid ESP and PG&E balances, and taking appropriate actions to recover the amounts owed. PG&E will not assume any collection obligations under this billing option.
- b. PG&E will hold the ESP liable for any late payments or unpaid bills. Unpaid, undisputed overdue balances owed PG&E will be considered late and subject to late payment fees and procedures and the provisions of Section N.
- c. PG&E will apply the same terms applicable to commercial accounts under default PG&E services to service accounts utilizing Consolidated ESP billing services. PG&E will notify the ESP if payment of PG&E charges has not been received within seventeen (17) days of the date delivered to the ESP.

* Due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section M.1.c of Electric Rule 22 and will allocate partial payments received from residential ESP customers on a pro rata basis with ESPs for up to one year, through April 16, 2021, as described in Advice 4244-G-A/ 5516-E-A. (N)
 |
 |
 (N)

(Continued)



ELECTRIC RULE NO. 23
COMMUNITY CHOICE AGGREGATION SERVICE

Sheet 46

Q. PAYMENT AND COLLECTION TERMS (Cont'd.)

- 8. If the customer disputes any PG&E charges, it shall nevertheless pay the amount billed; provided, however, that the customer may, at its election, pay that portion of the charges that the customer disputes to the Commission in accordance with Rule 10. If the customer disputes any CCA charges, the provisions of its agreement with the CCA shall apply. PG&E shall forward to the CCA amounts paid to cover CCA charges. However, no CCA may discontinue CCA Service to a residential customer for a disputed amount if that customer has filed a complaint with the Commission, and that customer has paid the disputed amount into an escrow account.
- 9. For CCA sundry charges, PG&E shall accept cash, check or electronic payments. The CCA must remit payment for any charges, approved by the Commission, for services provided it by the utility. Sundry charges shall be considered past due 30 days after the date the bill to the CCA is rendered.

R. Late or Partial Payments and Unpaid Bills

- 1. PG&E is responsible for collecting the unpaid balance of all charges from customers, sending notices informing customers of unpaid balances, and taking the appropriate actions to recover the unpaid amounts owed the CCA.
- 2. Except as provided below in Section 3, if a customer makes only a partial payment for a service account, the payment shall be allocated proportionally between PG&E's charges and the CCA's charges. A customer may dispute these charges as provided in Section P, but shall not otherwise have the right to direct partial payments for a particular service account. (Utility Users Taxes shall be treated in accordance with current utility procedures and are not subject to this section.)
- 3. In evaluating a delinquent residential Service Account for service termination and to the extent required by law or Commission regulations, partial payments shall be allocated first to delinquent disconnectable charges.* (T)
- 4. Undisputed overdue balances owed PG&E shall be considered late and subject to PG&E late payment procedures.
- 5. Commission-approved rules shall apply to late or non-payment of PG&E charges by the customer.

* Due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section R.3 of Electric Rule 23 and will allocate partial payments received from residential CCA customers on a pro rata basis with CCAs for up to one year, through April 16, 2021, as described in Advice 4244-G-A/ 5516-E-A. (N)
|
(N)

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Advice 4244-G-B/5816-E-B
July 15, 2020

Attachment 2

Redline Tariffs



GAS RULE NO. 1
DEFINITIONS

Sheet 9

EMERGENCY CONSUMER PROTECTION PLAN: (Cont'd)

Date of Proclamation	Disaster Name	Affected County
April 12, 2019	February 2019 Winter Storms	Butte, Colusa, Mariposa, Napa, Santa Cruz, Solano and Tuolumne
July 4 & 5, 2019	July 2019 Ridgecrest Earthquake	Kern and San Bernardino
October 25, 2019	Kincadee Wildfire	Sonoma
March 4, 2020	COVID-19 Pandemic ^{3,4}	All Counties throughout PG&E territory

(T)

³ Pursuant to CPUC Resolution M-4842 the consumer protections associated with the COVID-19 pandemic are extended through April 16, 2021.

(N)
(N)

⁴ Due to the special circumstances of COVID-19 pandemic only applicable measures of the Emergency Consumer Protection Plan were available to impacted customers per Advice 4227-G/ 5784-E and Advice 4244-G-A/5816-E-A.

(T)
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(T)

(Continued)



GAS RULE NO. 23

Sheet 26

GAS AGGREGATION SERVICE FOR CORE TRANSPORT CUSTOMERS

G. BILLING AND PAYMENT (Cont'd.)

1. BILLING (Cont'd.)

c. OPTIONAL CONSOLIDATED PG&E BILLING (Cont'd.)

5) Late or Partial Payments and Unpaid Bills

- a) PG&E is responsible for collecting the unpaid balance of all charges from Customers, sending notices informing Customers of unpaid balances, and taking the appropriate actions to recover the unpaid amounts owed the CTA.
- b) Except as provided below in Section c), if a Customer makes only a partial payment for a service account, the payment will be allocated proportionally between PG&E's charges and the CTA's charges. A Customer may dispute these charges as provided in Section 4.e), above, but will not otherwise have the right to direct partial payments for a particular service account. (Utility Users Taxes will be treated in accordance with current utility procedures and are not subject to this section.)
- c) In evaluating a delinquent residential service account for service termination and to the extent required by law or CPUC regulations, partial payments will be allocated first to delinquent charges that may result in discontinuance of service as specified in Rule 11.* (T)
- d) Undisputed overdue balances owed PG&E will be considered late and subject to PG&E late payment procedures.
- e) PG&E rules will apply to late or non-payment of PG&E charges by the Customer.

* Due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section G.1.c.5.c of Gas Rule 23 and will allocate partial payments received from residential CTA customers on a pro rata basis with CTAs for up to one year, through April 16, 2021, as described in Advice 4244-G-A/ 5516-E-A.

(N)
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(N)

(Continued)



ELECTRIC RULE NO. 1
DEFINITIONS

Sheet 15

EMERGENCY CONSUMER PROTECTION PLAN: (Cont'd):

Date of Proclamation	Disaster Name	Affected County
April 12, 2019	February 2019 Winter Storms	Butte, Colusa, Mariposa, Napa, Santa Cruz, Solano and Tuolumne
July 4 & 5, 2019	July 2019 Ridgecrest Earthquake	Kern and San Bernardino
October 25, 2019	Kincadee Wildfire	Sonoma
March 4, 2020	COVID-19 Pandemic ^{9,10}	All Counties throughout PG&E territory

(T)

ENERGY SUPPLY OR PROCUREMENT SERVICES: Includes, but is not limited to, procurement of electric energy; all scheduling, settlement, and other interactions with Scheduling Coordinators, and the ISO; all ancillary services and congestion management.

ENERGY SERVICE PROVIDER (ESP): An entity who provides electric supply services to Direct Access Customers within PG&E's service territory. An ESP may also provide certain metering and billing services to its DA Customers as provided for within these tariffs.

⁹ Pursuant to CPUC Resolution M-4842 the consumer protections associated with the COVID-19 pandemic are extended through April 16, 2021.

(N)
(N)

¹⁰ Due to the special circumstances of COVID-19 pandemic only applicable measures of the Emergency Consumer Protection Plan are available to impacted customers per Advice 4227-G/5784-E and Advice 4244-G-A/5816-E-A

(T)
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(T)

(Continued)



ELECTRIC RULE NO. 22
DIRECT ACCESS

Sheet 53

M. LATE OR PARTIAL PAYMENTS AND UNPAID BILLS (Cont'd.)

1. Consolidated PG&E Billing (Cont'd.)

- b. Except as provided below in Section (c), if a customer makes only a partial payment for a Service Account, the payment will be allocated proportionally between PG&E's charges and the ESP's charges. A customer may dispute these charges as provided in Section L, but will not otherwise have the right to direct partial payments for a particular Service Account. (Utility Users Taxes will be treated in accordance with current utility procedures and are not subject to this section.)
- c. In evaluating a delinquent residential Service Account for service termination and to the extent required by law or CPUC regulations, partial payments will be allocated first to delinquent disconnectable charges. Uncollectible delinquent ESP charges will be reflected, as appropriate, in PG&E's account receivable bad debt adjustment procedure.* (T)
- d. Undisputed overdue balances owed PG&E will be considered late and subject to PG&E late payment procedures.
- e. CPUC rules will apply to late or non-payment of PG&E charges by the customer.

2. Under Consolidated ESP Billing

- a. The ESP is responsible for collecting both unpaid ESP and PG&E charges, sending notices informing customers of unpaid ESP and PG&E balances, and taking appropriate actions to recover the amounts owed. PG&E will not assume any collection obligations under this billing option.
- b. PG&E will hold the ESP liable for any late payments or unpaid bills. Unpaid, undisputed overdue balances owed PG&E will be considered late and subject to late payment fees and procedures and the provisions of Section N.
- c. PG&E will apply the same terms applicable to commercial accounts under default PG&E services to service accounts utilizing Consolidated ESP billing services. PG&E will notify the ESP if payment of PG&E charges has not been received within seventeen (17) days of the date delivered to the ESP.

* Due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section M.1.c of Electric Rule 22 and will allocate partial payments received from residential ESP customers on a pro rata basis with ESPs for up to one year, through April 16, 2021, as described in Advice 4244-G-A/ 5516-E-A.

(N)
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(N)

(Continued)



ELECTRIC RULE NO. 23
COMMUNITY CHOICE AGGREGATION SERVICE

Sheet 46

Q. PAYMENT AND COLLECTION TERMS (Cont'd.)

- 8. If the customer disputes any PG&E charges, it shall nevertheless pay the amount billed; provided, however, that the customer may, at its election, pay that portion of the charges that the customer disputes to the Commission in accordance with Rule 10. If the customer disputes any CCA charges, the provisions of its agreement with the CCA shall apply. PG&E shall forward to the CCA amounts paid to cover CCA charges. However, no CCA may discontinue CCA Service to a residential customer for a disputed amount if that customer has filed a complaint with the Commission, and that customer has paid the disputed amount into an escrow account.
- 9. For CCA sundry charges, PG&E shall accept cash, check or electronic payments. The CCA must remit payment for any charges, approved by the Commission, for services provided it by the utility. Sundry charges shall be considered past due 30 days after the date the bill to the CCA is rendered.

R. Late or Partial Payments and Unpaid Bills

- 1. PG&E is responsible for collecting the unpaid balance of all charges from customers, sending notices informing customers of unpaid balances, and taking the appropriate actions to recover the unpaid amounts owed the CCA.
- 2. Except as provided below in Section 3, if a customer makes only a partial payment for a service account, the payment shall be allocated proportionally between PG&E's charges and the CCA's charges. A customer may dispute these charges as provided in Section P, but shall not otherwise have the right to direct partial payments for a particular service account. (Utility Users Taxes shall be treated in accordance with current utility procedures and are not subject to this section.)
- 3. In evaluating a delinquent residential Service Account for service termination and to the extent required by law or Commission regulations, partial payments shall be allocated first to delinquent disconnectable charges.* (T)
- 4. Undisputed overdue balances owed PG&E shall be considered late and subject to PG&E late payment procedures.
- 5. Commission-approved rules shall apply to late or non-payment of PG&E charges by the customer.

* Due to the COVID-19 pandemic and pursuant to CPUC Resolution M-4842, PG&E has suspended Section R.3 of Electric Rule 23 and will allocate partial payments received from residential CCA customers on a pro rata basis with CCAs for up to one year, through April 16, 2021, as described in Advice 4244-G-A/ 5516-E-A.

(N)
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(N)

(Continued)

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