

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94117

January 15, 2021

Advice 4269-G/5865-E
(Pacific Gas and Electric Company U 39 M)

Advice 2879-G/3564-E
(San Diego Gas & Electric Company U 902 M)

Advice 5655
(Southern California Gas Company U 904 G)

Advice 4238-E
(Southern California Edison Company U 338 E)

Advice 1137-G
(Southwest Gas Corporation U 905 G)

Advice 56-G
(Alpine Natural Gas Operating Company U 909 G)

Advice 395-E
(Bear Valley Electric Service U 913 E)

Advice 148-E
(Liberty Utilities LLC U 993 E)

Advice 620-E
(PacifiCorp d/b/a Pacific Power U 901 E)

Dear Mr. Jacobson:

Energy Division approves Pacific Gas and Electric Company's (PG&E) Joint Tier 1 AL supplement 4269-G-A/5865-E-A replacing AL 4269-G/5865-E in full, effective September 25, 2020. The Joint AL 4269-G-A/5865-E-A, filed on behalf of Pacific Gas and Electric Company PG&E, San Diego Gas & Electric Company (SDG&E), Southern California Gas Company (SCG), Southern California Edison Company (SCE), Southwest Gas Corporation (SoCalGas), Alpine Natural Gas Operating Company (ANG), Bear Valley Electric Service (BVES), Liberty Utilities LLC (Liberty CalPeco),

PacifiCorp d/b/a Pacific Power proposed a reporting template for Energy Savings Assistance (ESA) prime contractors in compliance with the ESA Contractor Advance, as authorized in Resolution E-5074. The Tier 1 AL and supplement addressed the reporting template for Prime Contractors to monitor the advance payment funds made to ESA Prime Contractors in response to impacts of the COVID-19 pandemic on the ESA workforce.

1. Background

On March 23, 2020, the California Public Utilities Commission (CPUC) released a letter requesting all four large Investor-owned Utilities (IOUs)¹ to provide specific assurance to help ensure the economic stability of the ESA program's workforce. This letter asked the IOUs to offer a 30-day advance payment to each eligible entity holding the agreement with the IOU (i.e. the Prime Contractor or "Prime") to cover the ESA labor costs plus costs critical to sustaining the ESA workforce.

On May 28, 2020, the CPUC adopted Resolution E-5074. Pursuant to Section 1.2.1 of Resolution E-5074, the IOUs created a reporting template to track the use of advance funds. Resolution E-5047 noted the template should include:

- The amount of funds advanced, by category broken down at least to
 - o employee salary and wages
 - o the employer costs for continuing the employees' benefits
 - o other employee costs deemed critical to sustaining the workforce
 - o remaining amount of funds advanced and associated costs (e.g. overhead);
- The calendar period for which the advance funds covered costs;
- The number of workers these funds sustained and for how long;
- At what salary/hourly rate (include data to show distribution, maximum, and minimum); and
- The description of employee benefits covered.

On July 19, 2020, the Energy Efficiency Council (EEC), filed a protest of Joint Tier 1 Advice Letter Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074. On July 20, 2020, La Cooperativa Campesina de California, MAROMA Energy, Proteus Inc. and FCI Management (Joint Parties) each filed protests of PG&E's Joint Tier 1 AL pursuant to Resolution 5074. On July 27, 2020, PG&E filed its response to the Energy Efficiency Council protest and the Joint Parties Protest to PG&E's Joint Tier 1 AL for Resolution 5074.

On September 2, 2020, at the direction of Energy Division staff, the IOUs held a teleconference with the protesting parties to discuss revisions to the reporting template to address the concerns raised in the EEC and Joint Parties' protest. After this meeting, the IOUs submitted a supplemental AL 4269-G-A/5865-E-A on September 25, 2020, stating that the IOUs believe the new proposed

¹ Pacific Gas and Electric, Southern California Edison, Southern California Gas, and San Diego Gas & Electric

reporting template is reasonable given the potential for future audits.² On September 25, 2020, PG&E filed supplemental 4269-G-A/5865-E-A. There were no additional protests received.

2. Energy Efficiency Council Protest and PG&E Reply Comments

EEC's protest included two items directed at PG&E's Tier 1 AL regarding:

- Flaws in the template format and the data requirements;
- Flaws in the template's basic assumptions.

2.1 Flaws in the AL's Template Format and Data Requirements

The EEC protest relating to the development of the ESA advance payment reporting template proposed by the IOUs in their Tier 1 AL focused on what the EEC contended was too much detail required in the reporting template.

Further, EEC argued that the template, which demands the provision of individual, proprietary data, is discriminatory against ESA contractors and their employees, because the data on payments to individual employees or even to types of employees is both confidential and proprietary. EEC argued that if the CPUC decides that it is necessary to have such employee-specific data at this time (or any later time), it can direct that it be submitted under a confidentiality restriction to the Energy Division and shared on a strict "need-to know" basis. Finally, EEC contended that supplying of confidential and proprietary individual employee data would be a significantly and unnecessarily burdensome.

EEC also stated that the template request for proprietary and confidential individual employee data was not authorized under the Resolution.

In its reply to EEC, the IOUs stated that they need detail in the reporting template for auditing purposes. The IOUs stated that they did not oppose working with EEC to balance competing needs and develop a simpler reporting template so long as it complied with the requirements outlined in Resolution. E-5074.³

On September 2, 2020, at the direction of Energy Division staff, the IOUs held a teleconference with the protesting parties to discuss revisions to the reporting template to address the concerns raised in the EEC's protest. After this meeting, the IOUs submitted a supplemental AL 4269-G-

² PG&E Supplemental: Joint Tier 1 AL Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074
Compliance with Resolution E-5074

³ PG&E AL 4269-G/5865-E: Joint Reply to the Protest from the Energy Efficiency Council and Comments from Joint Parties to AL 4269-G/5865-E et al. Joint Tier 1 ALAL Proposing a reporting template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074.

A/5865-E-A on September 25, 2020, stating that the IOUs believed the new proposed template was reasonable given the potential for future audits.⁴

Discussion

The reporting template submitted through in AL 4269-G-A/5865-E-A incorporated revisions from discussions between the IOUs and protesting parties, based on Energy Division direction to provide “the amount of funds advanced, by category broken down at least to; employee salary and wages. Employer costs for continuing the employees’ benefits, other employee costs deemed critical to sustaining the workforce, and overhead.”⁵ Energy Division believes the proposed, updated template is reasonable given that the potential for future audits ensures that all necessary information will be documented by the contractors. As directed in Resolution E-5074, all ESA prime contractors and sub-contractors shall provide the needed information to the contract-holding IOUs and CPUC to inspect and audit the accounting books for a period of four years.⁶

Additionally, the IOUs noted in their supplemental that to “the extent auditing of the advanced funds requires further details on the intended use of the funds, all ESA Prime Contractors and Sub-Contractors shall provide the needed information to the contract-holding IOUs and CPUC to inspect and audit the accounting books for a period of four years, as directed in Resolution E-5074.”⁷

Consequently, Energy Division agrees with the IOUs’ assessment that the updated reporting template is reasonable and addresses the concerns raised by EEC and the Joint Parties in their protests, and therefore approves the IOUs revisions to the reporting template submitted in supplemental AL # 4269-G-A/5865-E-A filed on September 25, 2020.

2.2 Flaws in the Template’s Basic Assumptions

EEC’s protest raised additional issues related to the reporting template’s basic assumptions. The first protest was the timing of the program suspension period. Also protested was the length of the Post Pandemic Return to Service (PPRS) earning period. As stated in Resolution E-5074, this Tier 1 AL is intended to focus on creating a reporting template for use by the IOUs and contractors to track how the ESA advance payments were spent.

- The IOUs lack Authority to Allow ESA Contractors use of Advance Payment Funds Outside the Suspension Period;

⁴ PG&E Supplemental: Joint Tier 1 AL Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074

⁵ RESOLUTION E-5074 Section Initial Disbursement Tracking

⁶ PG&E Supplemental: Joint Tier 1 AL Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074

⁷ PG&E Supplemental: Joint Tier 1 AL Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074

- The IOUs are bound by the resolution Language regarding the PPRS credit earning period.

In its reply, the IOUs stated that they lack the authority to allow ESA contractors use of advance payment funds outside the suspension period and that the IOUs are bound by the resolution Language regarding the PPRS credit earning period. Post-Pandemic Return to Service (PPRS) credit will only be available for six months after IOUs authorize a return to face-to-face service in the ESA program, and only used by Primes that accept this advance payment to pay back the eligible balance of the advance per their arrangement with the IOU.⁸

Discussion

Energy Division agrees with the IOUs assessment that they lack the authority to allow ESA contractors use of advance payment funds outside the suspension period and that the IOUs are bound by the resolution language regarding the PPRS credit earning period.

Further these two additional areas of protest from the EEC are not within the scope of the Tier 1 AL. Therefore, the CPUC will not respond on these two topics as requested by EEC in order to dispose of the template in scope of this AL. Resolution E-5074 is specific about the PPRS accrual period “The Prime shall only be able to generate PPRS credits through treatment of ESA-eligible households during the six months after the ESA program suspension of face-to-face activities is lifted by the IOUs.”⁹

3. LA COOPERATIVA CAMPESENA de CALIFORNIA, MAROMA ENERGY, PROTEUS INC. AND FCI MANAGEMENT (JOINT PARTIES)

The Joint Parties’ protest included two items directed at PG&E’s Tier 1 AL regarding:

- Flexibility of the PPRS credit accrual period;
- Template Reporting Details.

3.1 Flexibility of the PPRS Accrual Period

The Joint Parties’ protest took issue with the PPRS timelines, contending that the IOUs interpreted that the funds are available only during the suspension period but not during any ramp-up period.

In its reply, the IOUs stated that they lack the Authority to Allow ESA Contractors use of Advance Payment Funds Outside the Suspension Period and that the IOUs are bound by the resolution Language regarding the PPRS credit earning period.

Discussion

⁸ RESOLUTION E-5074 Section 2.6.4. Advance Payment Payback

⁹ RESOLUTION E-5074 Section 1.1.1

Energy Division agrees with the IOU assessment that they lack the authority to allow ESA contractors use of advance payment funds outside the suspension period and that the IOUs are bound by the resolution Language regarding the PPRS credit earning period.

Energy Division's position is the same as with the EEC protest discussion, this additional area of protest from the Joint Parties is not within the scope of the Tier 1 AL. RESOLUTION E-5074 is specific about the PPRS accrual period "The Prime shall only be able to generate PPRS credits through treatment of ESA-eligible households during the six months after the ESA program suspension of face-to-face activities is lifted by the IOUs."¹⁰

3.2 Template Reporting Details

The Joint Parties protested the practicality of the level of detail for employee reporting that they believe creates an unnecessary burden for contractors. Because the costs to contractors during COVID-19 is unpredictable, the Joint Parties believe that lessening this administrative cost is needed. They recommend creating more general categories of acceptable and eligible costs for the PPRS.¹¹

In its reply, the IOUs stated that they need detail in the reporting template for auditing purposes. Additionally, the IOUs reply to Joint Parties' protest states that they do not oppose working with EEC and Joint Parties to balance competing needs and develop a simpler reporting template so long as it complies with the requirements outlined in Resolution. E-5074.¹²

On September 2, 2020, at the direction of Energy Division staff, the IOUs held a teleconference with the protesting parties to discuss revisions to the reporting template to address the concerns raised in the EEC and Joint Parties' protest. After this meeting, the IOUs submitted a supplemental AL 4269-G-A/5865-E-A on September 25, 2020 stating that the IOUs believe the new proposed template is reasonable given the potential for future audits.¹³

Discussion

The reporting template submitted through the supplemental AL incorporates revisions from discussions between the IOUs and protesting parties, based on Energy Division direction. Energy Division believes the proposed, updated template is reasonable given the potential for future audits. All ESA Prime Contractors and Sub-Contractors shall provide the needed information to the

¹⁰ RESOLUTION E-5074 Section 1.1.1

¹¹ Joint Parties Comments to Resolution E-5074

¹² PG&E AL 4269-G/5865-E: Joint Reply to the Protest from the Energy Efficiency Council and Comments from Joint Parties to AL 4269-G/5865-E et al. Joint Tier 1 ALAL Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074.

¹³ PG&E Supplemental: Joint Tier 1 AL Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074

contract-holding IOUs and CPUC to inspect and audit the accounting books for a period of four years.¹⁴

Additionally, the IOUs note in their supplemental that to “the extent auditing of the advanced funds requires further details on the intended use of the funds, all ESA Prime Contractors and Sub-Contractors shall provide the needed information to the contract-holding IOUs and CPUC to inspect and audit the accounting books for a period of four years, as directed in Resolution E-5074.”¹⁵

Consequently, Energy Division agrees with the IOUs’ assessment that the updated reporting template is reasonable and addresses the concerns raised by EEC and the Joint Parties in their protests, and therefore approves the IOUs revisions to the reporting template submitted in supplemental AL # 4269-G-A/5865-E-A filed on September 25, 2020.

Further Energy Division agrees with the IOU assessment that they lack the authority to allow ESA contractors use of advance payment funds outside the suspension period and that the IOUs are bound by the resolution Language regarding the PPRS credit earning period.

Please direct any questions regarding Energy Division’s findings in this non-standard disposition to Erik Johnson (Erik.Johnson@cpuc.ca.gov).

Sincerely,

Handwritten signature of Edward Randolph in black ink, followed by the text "(for)" in parentheses.

Edward Randolph,

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

Cc: Service List A.14-11-007, et al.

Pete Skala, Energy Division
Jennifer Kalafut, Energy Division
Alison LaBonte, Energy Division
Jason Symonds, Energy Division

¹⁴ PG&E Supplemental: Joint Tier 1 AL Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074

¹⁵ PG&E Supplemental: Joint Tier 1 AL Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074



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September 25, 2020

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(Southern California Edison Company U 338 E)

Advice 1137-G-A

(Southwest Gas Corporation U 905 G)

Advice 56-G-A

(Alpine Natural Gas Operating Company U 909 G)

Advice 395-E-A

(Bear Valley Electric Service U 913 E)

Advice 148-E-A

(Liberty Utilities LLC U 993 E)

Advice 620-E-A

(PacifiCorp d/b/a Pacific Power U 901 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Joint Tier 1 Advice Letter Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074

Purpose

Pursuant to California Public Utilities Commission (Commission or CPUC) Resolution E-5074, Ordering Paragraph (OP) 10, Pacific Gas and Electric Co. (PG&E), Southern California Edison (SCE), San Diego Gas & Electric Company (SDG&E), the Southern California Gas Company (SCG), Alpine Natural Gas Operating Company, Bear Valley Electric Service (BVES), a division of Golden State Water Company, Liberty Utilities (CalPeco Electric) LLC (Liberty CalPeco), PacifiCorp d/b/a Pacific Power, and Southwest Gas Corporation (joint investor-owned utilities (IOUs)) submitted a joint Tier 1 Advice Letter (AL) on June 29, 2020, proposing a reporting template for Prime Contractors to use in their reporting to IOUs to monitor the proper use and track the balance of the advance payment funds made to Energy Savings Assistance (ESA) Prime Contractors and eligible entities.¹

The purpose of this joint supplemental advice letter is to provide an updated reporting template for Prime Contractors to use in their reporting to the IOUs. Additionally, this AL addresses the following:

- If Prime or its Sub-Contractors for ESA work receive monies that are duplicate funding, the Prime shall pass-through to the IOU as soon as possible or no later than thirty (30) days after receipt thereof, all such assistance amounts up to the then current balance of advanced funds, and the balance of advanced funds shall be decremented by the amount passed through to the IOU². Also, the contract-holding IOU and CPUC shall have full access to inspect and audit the accounting books (associated with payroll and benefits) of all ESA Prime Contractors and Sub-Contractors for a period of four years.³

Background

On March 4, 2020, Governor Gavin Newsom (Governor) declared a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.⁴ On March 13, 2020, President Trump signed an Emergency Declaration to facilitate a federal response to the emerging COVID-19 pandemic.⁵ On March 19, 2020, to protect public health, Governor Newsom ordered all individuals living in the State of California to stay at home or at their

¹ BVES, Liberty CalPeco, PacifiCorp, and Alpine Natural Gas Company will not be making advance payments pursuant to Resolution E-5074 and, therefore, are not included in this joint Advice Letter related to the Prime Contractor Reporting Template. Pursuant to Ordering Paragraph No. 3, BVES and Liberty CalPeco, did not offer the 60-day advance payment to their ESA contractors due the current contracts expiring before the end of 2020.

² Resolution E-5074 at 15

³ Id., at 14

⁴ Available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>

⁵ Available at <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-nationalemergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>

place of residence to slow the spread of COVID-19. In order to comply with this order, the IOUs temporarily suspended all face-to-face ESA Program activities.

On March 23, 2020, Executive Director, Alice Stebbins of the CPUC sent a letter requesting all IOUs offer a 30-day advance payment to ESA Prime Contractors to help maintain the economic stability of the ESA Program's workforce.

On April 7, 2020, Executive Director Stebbins sent a second letter to the IOUs clarifying guidance of the March 23, 2020 letter, and requesting all four large IOUs offer a second 30-day advance payment (total of 60-days) to ESA Prime Contractors to continue efforts to help maintain the economic stability of the ESA Program's workforce.

On April 24, 2020, the Commission issued Draft Resolution E-5074 to affirm and clarify the March 23, 2020 and April 7, 2020 letters sent by Executive Director Stebbins and provided further direction in response to additional elements proposed by the ESA contractors.

On May 28, 2020, the Commission adopted Res. E-5074 ratifying elements of the Executive Director Stebbins's March 23, 2020 and April 7, 2020 letters. Specifically, Res. E-5074: 1) ratifies the 60-day advance payment to ESA Prime Contractors, 2) approves with modification a pay-for-performance mechanism for repayment known as the Post Pandemic Return to Service (PPRS) credit, 3) approves expedited IOU invoice payments, and 4) requires all IOUs (including Small and Multi-Jurisdictional Utilities (SMJUs)) to offer the advance payment to their ESA Prime Contractors.

On June 12, 2020 SDG&E on behalf of the IOUs notified the appropriate service lists and all Prime Contractors of the proposed percentage for the PPRS credit pursuant to OP 8 of Resolution E-5074.⁶

Southern California Gas began their PPRS earning period on July 15, 2020. Southwest Gas Corporation began its PPRS earning period on August 7, 2020. PG&E plans to begin its PPRS earning period on Dec 1, 2020. SDG&E and SCE are engaging with their ESA Contractors and assessing the ongoing COVID pandemic in their respective service territories to determine an appropriate start date for the PPRS credit earning period.

Discussion

As required by Resolution E-5074, the IOUs developed a reporting template for Prime Contractors, which will track and report the use of advance funds to ensure that ratepayer

⁶ Pursuant to discussions with counsel for BVES, Liberty CalPeco, PacifiCorp, and Alpine Natural Gas Company, those entities will not be making advance payments pursuant to Res. E-5074 and were therefore not included in the PPRS credit joint notice.

funds are used appropriately.⁷ Pursuant to Section 1.2.1 of Resolution E-5074, the Prime Contractor monthly reporting template includes:

1. Amount of funds advanced by category;
 - a. Employee salary and wages;
 - b. Employer costs for continuing employee benefits;
 - c. Other employee costs deemed critical to sustaining the workforce;
 - d. Remaining amount of funds advanced and associated costs (e.g. overhead)
2. The calendar period for which the advance funds covered costs;
3. The number of workers these funds sustained and for how long, at what salary/hourly rate (including data to show distribution, maximum, and minimum); and
4. A description of employee benefits covered.

On September 2, 2020, the IOUs held a teleconference with the protestants⁸ to discuss revisions to the reporting template that can address the concerns raised in the EEC and Joint Parties' protest.⁹ The proposed reporting template, Attachment A, incorporates the revisions made to the reporting template based on these discussions and the Commission's guidance to provide "the amount of funds advanced, by category broken down at least to..."¹⁰ found in Resolution E-5074. The Resolution was not clear on the level of granularity required for the reporting template; however, the IOUs believe the proposed template is reasonable given the potential for future audits. To the extent auditing of the advanced funds requires further details on the intended use of the funds, all ESA Prime Contractors and Sub-Contractors shall provide the needed information to the contract-holding IOUs and CPUC to inspect and audit the accounting books for a period of four years, as directed in Resolution E-5074.¹¹

The proposed reporting template is included as Attachment A, ESA Prime Contractor Resolution E-5074 Advance Payment Reporting Template. The Prime Contractor will provide the reports to the IOUs using this template, corresponding to the months or partial months that the advance covered.

In the event that Prime Contractors or Sub-Contractors for ESA work receives any assistance monies that are duplicate funding, the Prime shall pass-through to the IOU as soon as possible or no later than thirty (30) days after receipt thereof, all such assistance

⁷ Resolution E-5074 OP 10 at 13-14

⁸ Energy Efficiency Council (EEC) and the La Cooperativa Campesina de California, MAROMA Energy, Proteus Inc. and FCI Management.

⁹ La Coop et al. Protest Comments and EEC Protest PGE AL 4269-G_5865-E F

¹⁰ Resolution E-5074, at 13, Section 1.2.1

¹¹ Resolution E-5074, at 14

amounts up to the then current balance of advanced funds, and the balance of advanced funds shall be decremented by the amount passed through to the IOU.¹²

The mutually agreed upon template should not be considered agreement regarding the other issues put forth in the Joint Parties/EEC protest.¹³

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

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*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than October 5, 2020, which is 10 days¹⁴ after the date of this submittal. In addition, the comment period is limited to 4 days from day of submittal, September 29, 2020. 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:

¹² Resolution E-5074, at 15

¹³ La Coop et al. Protest Comments and EEC Protest PGE AL 4269-G_5865-E F.

¹⁴ The protest period has been shortened to an 8-day period, which concludes on a weekend; therefore, PG&E is moving this date to the following business day.

For PG&E:

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c/o Megan Lawson
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San Francisco, California 94177

Facsimile: (415) 973-3582
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For SDG&E:

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com

For SoCalGas:

Attn: Ray B. Ortiz
Tariff Manager - GT14D6
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Diana S. Gallegos
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For Southwest Gas Corporation:

Attn: Mr. Justin Lee Brown
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For PacifiCorp:

Pooja Kishore
Regulatory Affairs Manager
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232
Telephone (503) 813-7314
Facsimile: (503) 813-6060
Email: californiadockets@pacificorp.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 supplemental advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is September 25, 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 for A.14-11-007 et al. and A.15-02-001 et al. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List A.14-11-007 et al.
Service List A.15-02-001 et al.



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) #: 4269-G-A/5865-E-A, et al.

Tier Designation: 1

Subject of AL: Supplemental: Joint Tier 1 Advice Letter Proposing a Reporting Template for Energy Savings Assistance (ESA) Prime Contractors in Compliance with Resolution E-5074

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 #: Res. E-5074

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: 9/25/20

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:

Advice 4269-G-A/5865-E-A et al.
September 25, 2020

Attachment A

ESA Prime Contractor Resolution E-5074 Advance Payment Reporting Template

Contractor Instructions:

Please use this workbook to report your usage of advance funds.

For the reporting tab, please only include expenses related to working with this specific utility company.

Please use the below cost categories to report on eligible costs. If you have any questions on the cost categories please consult the IOU in which this report is for.

Labor costs and employee costs critical to sustaining the

workforce: gross wages and other payments for labor, including vacation, paid time off and sick pay; employer taxes on wages (e.g., social security, Medicare, etc.); workers compensation; employer contributions for health care premiums, for retirement plans, and for other employee benefits.

Overhead costs: rent, mortgage or lease payments; utilities, including natural gas, electric service, liability insurance, telecommunications (phone and internet), and water & sewage; property taxes.

Utility Company Name:	
Contractor Company Name:	

I am an officer of the Contractor Company herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Signature:	X
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Signee's Name: _____
Signee's Role: _____
Date: _____

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