

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



October 6, 2021

**Advice Letter 4293-G/5916-E, 4293-G-A/5916-E-A**

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**SUBJECT: Implementing Improvements to Medical Baseline Programs and Affirming Compliance with SB 1338.**

Dear Mr. Jacobson:

Advice Letters 4293-G/5916-E, 4293-G-A/5916-E-A are effective as of September 23, 2021, per resolution E-5169 ordering paragraphs.

Sincerely,

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

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

August 17, 2020

**Advice 4293-G/5916-E**

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Pacific Gas and Electric Company's Plan to Implement Senate Bill 1338's Requirements in Support of the Medical Baseline Program, Pursuant to D.20-06-003, Ordering Paragraphs 39-41**

**Purpose**

Pursuant to Ordering Paragraphs (OP) 39-41 of Decision (D.) 20-06-003 and informed by Senate Bill (SB) 1338, Pacific Gas and Electric Company (PG&E) submits this advice letter (AL) to provide the following information in support of the medical baseline program (MBL):

- Section A: Confirming that a physician assistant or nurse practitioner can authorize customer eligibility for MBL, and that PG&E will enable qualified medical professionals to authorize eligibility electronically;
- Section B.1: Describing existing outreach to increase awareness of MBL that will continue, including providing financial support to Community Based Organizations (CBOs) for marketing, outreach and other services to MBL customers;
- Section B.2: Detailing engagement with the medical community and county public health offices to increase outreach to customers eligible for MBL;
- Section C: Proposing enrollment goals and other metrics; and
- Section D: Describing PG&E's plans to track incremental costs associated with implementing required activities.

On August 10, 2020, the investor-owned utilities (IOUs) met with the California Public Utilities Commission's (CPUC or Commission) Energy Division Staff to discuss this AL. During this discussion, Energy Division Staff provided guidance and recommendations covering a number of areas regarding the MBL program. PG&E plans to work with the Energy Division staff on these items and submit a supplemental AL to address these recommendations as needed.

## **Background**

On September 18, 2018, Governor Brown approved Senate Bill (SB) 1338.<sup>1</sup> SB 1338 enacted the following policies:

- Authorizing a physician assistant to certify customer eligibility to enroll in MBL;
- Directing the Commission to develop rules requiring the IOUs to show that they are working with the medical community to increase marketing and outreach to customers eligible for MBL; and
- Requiring the IOUs to increase marketing and outreach programs to customers eligible for MBL in coordination with county public health offices.

On June 16, 2020, the Commission issued the *Phase I Decision Adopting Rules and Policy Changes to Reduce Residential Customers Disconnections for the Larger California-Jurisdictional Energy Utilities* (D.20-06-003). D.20-06-003 adopts the following requirements in support of SB 1338 and requires the IOUs to describe their efforts to implement these requirements in a Tier 3 AL:<sup>2</sup>

- Authorizing a physician assistant or nurse practitioner to certify customer eligibility for MBL;
- Requiring the IOUs to allow qualified medical professionals to electronically certify customer eligibility for MBL;
- Requiring the IOUs to detail existing MBL outreach that will continue, including funding small grants to CBOs;
- Requiring the IOUs to work with county public health offices to increase MBL outreach, including:
  - Hosting an annual training for workers that do home visits before the second quarter of each year; and
  - Supplying outreach and educational materials in multiple languages for workers to take into the field; and
- Requiring the IOUs to set enrollment goals and other metrics.

## **Discussion**

### **A. Modifications to MBL Authorization Requirements**

D.20-06-003 authorizes a physician assistant<sup>3</sup> or nurse practitioner<sup>4</sup> to certify customer eligibility for MBL. It also requires the IOUs to implement a system that allows qualified

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<sup>1</sup> SB 1338 amended Sections 739 and 779.3 and added Section 779.4 to the Public Utilities Code.

<sup>2</sup> The Commission adopted these requirements in D.20-06-003, OPs 34-41.

<sup>3</sup> D.20-06-003, OP 34.

<sup>4</sup> D.20-06-003, p. 76.

medical professionals to electronically certify customer eligibility.<sup>5</sup> PG&E describes its plans to implement these requirements below.

### **1. Physician Assistant and Nurse Practitioner Authorization**

On August 30, 2018, the Commission approved PG&E Advice 3998-G/5342-E and 3998-G-A/5342-E-A. In these advice letters, PG&E proposed to change the definition of “qualified medical practitioner” on its MBL application (Form 62-3481) to include a physician assistant and nurse practitioner. The modified definition states:

Qualified medical practitioners include; licensed physicians, surgeons and persons licensed pursuant to the Osteopathic Initiative Act per California Public Utilities Code §739 and nurse practitioners consistent with PG&E’s current practice and as now provided in California Public Utilities Codes & §799.3. In addition, per PG&E’s current practice, a licensed physician assistant working as a part of the customer’s physician team may certify a patient eligibility as having a life-threatening condition or illness.<sup>6</sup>

PG&E updated its MBL application to reflect these changes following Commission approval of its advice letters. PG&E continues to allow a physician assistant or nurse practitioner to certify customer eligibility for MBL.

### **2. Electronic Authorization**

In PG&E Advice 3998-G/5342-E and 3998-G-A/5342-E-A, PG&E stated that it was “preparing the Medical Baseline Allowance Application (Form 62-6481) for online presentment that will enable both the customer and their qualified medical practitioner to sign off on the form using an online automated procedure.”<sup>7</sup>

On June 19, 2020, PG&E launched an online MBL application form. Due to the COVID-19 pandemic, PG&E is not requiring a qualified medical practitioner to certify customer eligibility for MBL for up to twelve months from March 4, 2020.<sup>8</sup> PG&E is currently developing an online process to allow qualified medical practitioners to authorize customer eligibility. PG&E plans to coordinate the launch of the online process with the expiration of the COVID-19 MBL protections to minimize customer impacts.

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<sup>5</sup> D.20-06-003, OPs 35 and 36.

<sup>6</sup> PG&E Advice 3998-G/5342-E, p. 2, FN 1. Emphasis added.

<sup>7</sup> PG&E Advice 3998-G/5342-E, p. 2.

<sup>8</sup> For more information, see PG&E Advice 4227-G-A/5784-E-A and 4227-G-B/5784-E-B, approved by the Commission effective March 19, 2020.

## **B. MBL Marketing and Outreach**

D.20-06-003 requires the IOUs' Tier 3 ALs to detail existing outreach that will continue as well as describe its plans to implement new requirements.<sup>9</sup> PG&E discusses these topics in greater detail below.

### **1. Existing Outreach That Will Continue**

PG&E will continue multi-channel outreach campaigns to increase MBL awareness and enrollment. This includes promoting the program through direct mail, digital newsletters, bill inserts, webinars, paid media, and its website. For instance, on June 1, 2020, PG&E included a MBL bill insert in all customers' bill packages as well as a MBL promotional message in its residential digital newsletter.

In addition, PG&E will continue to cross-promote MBL through its low-income programs, such as the California Affordable Rates for Energy (CARE), Family Electric Rate Assistance (FERA) and Energy Savings Assistance (ESA) programs. For example, PG&E hosted three webinars in April 2020 to encourage CARE outreach contractors to raise awareness of MBL.<sup>10</sup>

Furthermore, the Commission directs the IOUs in D.20-06-003 to "continue funding small grants to CBOs relating to medical baseline outreach."<sup>11</sup> The Commission states, "PG&E has given out small grants to increase Medical Baseline outreach to CBOs like Central Coast Energy Services and has established a large contract with the Center for Independent Living."<sup>12</sup>

PG&E clarifies that it has not provided, and does not anticipate providing, charitable grants to CBOs to increase awareness of MBL. Instead, PG&E has provided and plans to continue to provide some charitable funding under sponsorship agreements to CBOs, such as Central Coast Energy Services, to provide groups of utility customers, including existing low-income MBL customers, with emergency preparedness information that provides general, non-utility related safety information regarding, for example, how to safely evacuate during a wildfire. PG&E does not use charitable funding to support or promote programs related to PG&E operations and related obligations.

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<sup>9</sup> D.20-06-003, OPs 39-41.

<sup>10</sup> PG&E has 39 CARE outreach contractors that support outreach and education. Each year, PG&E trains its CARE Outreach Contractors on all customer assistance programs available through PG&E, including MBL. PG&E encourages these CBOs to use a holistic approach when educating their clients in their offices and at local community events.

<sup>11</sup> D.20-06-003, OP 41.

<sup>12</sup> D.20-06-003, p. 78, FN 172. PG&E clarifies that the contract cited in D.20-06-003 is with the California Foundation for Independent Living Centers.

However, PG&E does have a non-charitable contract with the California Foundation for Independent Living Centers (CFILC)<sup>13</sup> to launch the Disability Disaster Access and Resources Program. The program allows community-based independent living centers (ILCs) to provide qualified customers who use electrical medical devices with access to backup portable batteries through a grant, lease-to-own, or the FreedomTech low-interest financial loan program. ILCs will also share information on MBL with customers as part of its in-person and virtual accessible engagements.

Additionally, PG&E is contracting with Low Income Home Energy Assessment Program (LIHEAP) CBOs and ESA providers to support its new Portable Battery Pilot (PBP) Program for low-income, medically vulnerable customers in High Fire Threat Districts (HFTDs) throughout PG&E's service area. PG&E created its PBP Program in response to feedback received from stakeholders in the access and functional needs (AFN) community and MBL customers impacted by Public Safety Power Shutoff (PSPS) events. The program leverages the LIHEAP and ESA networks to assess customers' energy needs for critical medical equipment and the overall preparedness for a PSPS event, and provides customers a fully subsidized portable backup battery solution with sufficient power to charge critical electronic devices (i.e., cell phones or tablet computers) and operate the customer's medical devices in the event of a PSPS.

In addition to these contracts, PG&E is developing informational partnerships with CBOs to support outreach to customers who may be eligible for MBL. Currently, 168 CBOs have agreed to share information about the program.

## **2. New and Modified MBL Outreach**

PG&E is also implementing new and modified approaches to increase awareness of MBL, such as soliciting feedback for improvements from customers and groups such as the People with Disabilities and Aging Advisory Council (PWDAAC), developing a propensity model, and coordinating with the medical community and county public health offices.

### **i. MBL Customer Research and Partner Feedback**

PG&E refined its existing outreach based on conversations with customers and healthcare practitioners in late 2019. This includes surveying nearly 1,000 current, former, and prospective MBL customers, conducting in-depth interviews with 16 eligible

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<sup>13</sup> CFILC is a registered 501(c)(3) non-profit corporation that increases access and equal opportunity for people with disabilities by building the capacity of Independent Living Centers throughout California. In addition to operating as a membership organization, CFILC has several statewide programs and campaigns that focus on different areas of disability advocacy and provide avenues of success for both their members, the independent living network and, more importantly, people with disabilities of all ages who chose to live independently in their community of choice.

customers, and meeting with twelve healthcare practitioners.<sup>14</sup> PG&E concluded that although MBL satisfaction is high (75% are very satisfied), the program is likely undersubscribed. For example, two out of three prospective MBL customers<sup>15</sup> did not know about the program and many current MBL customers were not aware of the recertification process. PG&E also received feedback that it should improve its coordination with health care practitioners to increase program awareness.

In addition, PG&E seeks feedback on opportunities to increase awareness of the MBL program from a diverse group of partners as part of its broader engagement for the Public Safety Power Shutoff (PSPS) program. PG&E will continue to engage with these partners, which include:

- **People with Disabilities and Aging Advisory Council (PWDAAC):** PG&E launched the PWDAAC in April 2020 to gather insight on the needs of AFN populations. The PWDAAC currently meets on a monthly basis and provided recommendations to improve the accessibility of PG&E's MBL outreach, such as ensuring that its mobile website is ADA tested and screen reader friendly for the visually impaired and developing informational videos that can be viewed in closed captioning.
- **Regional Working Groups:** PG&E launched regional working groups to solicit feedback from local organizations and agencies.<sup>16</sup> PG&E hosted its first regional working group sessions between July 27-29, 2020 across five regions.<sup>17</sup> During the sessions, PG&E requested input on assistance for current and potentially-eligible MBL customers and received feedback on the need for trainings with healthcare leads who assist current and potentially-eligible MBL customers.

## ii. MBL Propensity Model and Acquisition Campaign

PG&E created a propensity model in 2020 to identify customers with the highest likelihood to qualify for and enroll in MBL. PG&E developed the model by testing more than 300 independent variables to determine a shortlist of qualified predictors for enrollment. The model enables PG&E to classify customers into ten propensity deciles for targeted marketing. The top decile (1) has 10% of the population most likely to be eligible and the bottom decile (10) has 10% of the population least likely to be eligible,

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<sup>14</sup> For more information, see "Pacific Gas and Electric Company's Access and Functional Needs Plan for Public Safety Power Shutoff Support," June, 1, 2020. PG&E filed this report with the Commission pursuant to D.20-05-051, Conclusion of Law 36.

<sup>15</sup> Those with qualifying medical issues not currently enrolled in the program.

<sup>16</sup> This includes small multi-jurisdictional electric utilities, community choice aggregators, publicly-owned electric utilities, communications and water service providers, Commission Staff, tribal and local government entities, public safety partners, and representatives of people and communities with access and functional needs

<sup>17</sup> North Coast, North East, Bay Area, Central Valley, and Central Coast.

based on the model's scores. PG&E estimates that the model currently has a 72% accuracy.

PG&E used its propensity model to launch a targeted MBL customer acquisition campaign in Q2 2020. PG&E summarizes key highlights from the campaign below:

- **Search Engine Marketing:** Beginning in April 2020, PG&E launched search engine marketing, which delivered over 5.2 million impressions and over 705,000 clicks. This paid search campaign includes both English and Spanish advertisements and is planned to continue through September 2020. Two approaches were used: (1) traditional search targeted, branded keywords, and (2) Gmail Ads, which are delivered to Gmail inboxes.
- **Display Advertising:** Beginning in early May 2020, PG&E added digital media display as another tactic in the MBL customer acquisition campaign. To-date, display has delivered over 19.6 million impressions and over 19,000 clicks. Display is also serving ads in both English and Spanish and is planned to continue through September 2020.
- **Direct to Customer Letters:** On June 19, 2020, PG&E sent 840,000 letters with a program application and pre-paid return envelope to prospective MBL customers that were determined to be the top 40% most likely to be eligible (propensity model deciles 1–4). The letter also included program information translated into 12 languages.<sup>18</sup>
- **Direct to Customer Emails:** On June 20, 2020 PG&E sent nearly 1.4 million emails to prospective customers to the top 70% of customers forecasted to be eligible (propensity model deciles 1–7). PG&E re-sent the email one week later to 940,000 customers that did not open the first email. On June 25, 2020, PG&E sent a second email to 3.3 million residential customers that also included a promotional message about the MBL program.
- **Customer Bill Inserts:** On June 1, 2020, PG&E included an MBL bill insert in all customers' bill packages and included an MBL promotional message in its residential email newsletter sent to 3.3 million customers.

### iii. Coordination with the Medical Community and County Public Health Offices

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<sup>18</sup> These languages are Spanish, Chinese (Mandarin & Cantonese), Vietnamese, Tagalog, Russian, Korean, Arabic, Punjabi, Farsi, Japanese, Khmer, and Hmong. For more information, see PG&E Advice 4249-G/5827-E, filed May 15, 2020.

D.20-06-003, OP 39 requires the IOUs to describe how they are working with the medical community and county public health offices to increase outreach to customers eligible for MBL. PG&E recognizes that engagement with health care practitioners, medical associations, and medical device suppliers is a key opportunity to encourage enrollment in MBL. To this end, PG&E is developing a health care outreach strategy to identify and engage the right contacts in the industry. This includes major health care providers, county health and human services departments and public health departments, in-home support services, social workers, medical device suppliers, and medical associations.<sup>19</sup>

Due to the range of stakeholders in the healthcare industry, PG&E is reviewing and refining existing outreach resources to meet the targeted audiences' needs. This includes hosting an annual training for county health workers that do in home visits before the second quarter of each year and supplying these workers with translated outreach materials in 12 languages.<sup>20</sup>

For example, PG&E hosted webinars on July 8 and 13, 2020 that were attended by more than 460 key CBO and county public health office contacts representing AFN communities. During the webinars, PG&E provided information on its 2020 PSPS program and an in-depth MBL training, including a walkthrough of how to complete the MBL application followed by a robust question and answer session. After the webinars, PG&E sent attendees a copy of the presentation as well as a recording of the webinars.

Following the webinars, PG&E's Americans with Disabilities Act (ADA) Coordinator e-mailed contacts at all county health offices to coordinate on future outreach opportunities. PG&E will continue to engage with industry contacts as part of its health care outreach strategy. For example, PG&E will meet with the California Hospital Council in August 2020 to discuss partnership opportunities, including promotion of MBL. Furthermore, PG&E is coordinating with the California Association of Medical Product Providers and the California Association of Nursing Facilities to discuss opportunities to promote the MBL program.

In addition to direct outreach to county public health offices, PG&E and the other IOUs are partnering with the California Department of Public Health (CDPH) to promote MBL. For example, the IOUs helped CDPH draft a letter to its certified health care partners in July 2020 to increase awareness of MBL.

### **C. MBL Enrollment Goals and Other Metrics**

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<sup>19</sup> PG&E's existing contacts with these organizations are either operational in nature for PSPS, or billing-related contacts. PG&E will leverage these contacts to develop additional contacts to assist in outreach to increase awareness and enrollment.

<sup>20</sup> These languages are Spanish, Chinese (Mandarin & Cantonese), Vietnamese, Tagalog, Russian, Korean, Arabic, Punjabi, Farsi, Japanese, Khmer, and Hmong. For more information, see PG&E Advice 4249-G/5827-E, filed May 15, 2020.

D.20-06-003 requires the IOUs to include enrollment goals and other metrics in their Tier 3 ALs, including the number of customers reached and ultimately enrolled in MBL.<sup>21</sup> Furthermore, the Commission encourages the IOUs to “strive to increase enrollment in the medical baseline program above 2018 levels.”<sup>22</sup> PG&E discusses its MBL metrics in further detail below.

### 1. MBL Enrollment Goals and Metrics

As of July 29, 2020, total enrollments and new enrollments in the MBL program have increased significantly relative to 2018 (see Table 1 for more information).

**Table 1: MBL Enrollments (2018-2020 YTD)**

Year	Total Start of Year MBL Customers	New MBL Customers	MBL Customers Removed*	Total End of Year MBL Customers
2018	193,218	30,041	(30,748)	192,511
2019	192,511	39,159	(38,240)	193,430
2020 (YTD)*	193,430	43,904	(12,714)	224,620

\*PG&E suspended program removals in March 2020 in response to the COVID-19 pandemic. However, customers may still be counted as removed from the program if they stop service and do not start re-start service with PG&E.  
\*\*July 2020 YTD is as of July 29, 2020.

Moreover, Table 2 shows that enrollments increased significantly since March 2020, which coincides with the introduction of PG&E’s COVID-19 customer protections for the MBL program.

**Table 2: MBL Enrollments (January-July 2020 YTD)**

	January	February	March	April	May	June	July YTD*
Total Start of Month MBL Customers	193,430	193,779	192,626	194,143	194,527	198,532	206,423
New MBL Customers	2,186	2,223	3,529	1,597	5,454	8,989	19,926
MBL Customers Removed**	(1,837)	(3,376)	(2,012)	(1,213)	(1,449)	(1,098)	(1,729)
Total End of Month MBL Customers	193,779	192,626	194,143	194,527	198,532	206,423	224,620

\*July 2020 YTD is as of July 29, 2020.  
\*\*PG&E suspended program removals in March 2020 in response to the COVID-19 pandemic. However, customers may still be counted as removed from the program if they stop service and do not start re-start service with PG&E.

In response to the COVID-19 pandemic, PG&E filed Advice 4227-G-A/5784-E-A and 4227-G-B/5784-E-B. The Commission approved these ALs effective March 19, 2020. In

<sup>21</sup> D.20-06-003, OP 40.

<sup>22</sup> D.20-06-003, p. 78.

these ALs, PG&E proposed to implement the following protections for up to twelve months from March 4, 2020:

- Suspending all customer removals from the MBL program; and
- Allowing customers to enroll or re-certify eligibility for the MBL program without authorization from a qualified medical practitioner.

In implementing these protections, PG&E will allow customers that enroll or re-certify their eligibility without authorization from a qualified medical practitioner to remain in the program for up to twelve months. For example, a customer that enrolls in the MBL program in August 2020 will not be required to provide authorization from a qualified medical practitioner of their eligibility until at least August 2021.

Within this context, PG&E's enrollment goals are to achieve and sustain an increase in MBL enrollments relative to 2018 levels. PG&E proposes to measure progress towards this goal through metrics that track the total end of year enrollments and new enrollments in the MBL program.

## **2. MBL Outreach Goal and Metrics**

In addition, PG&E proposes an outreach goal to increase engagement with prospective MBL customers through multi-channel outreach and awareness campaigns. PG&E intends to measure progress towards this goal by tracking metrics that include the total number of outreach channels used as well as the reach of each channel (e.g. number of touches, number of customers reached, etc.). See Table 3 for an overview of PG&E's proposed MBL outreach goal and metrics.

**Table 3: Overview of PG&E's MBL Outreach Goal and Metrics**

<b>Goal: increase engagement with prospective MBL customers through multi-channel outreach and awareness campaigns</b>										
<b>Year</b>	<b>Total Channel Count</b>	<b>Direct Mail</b>		<b>Email</b>			<b>Bill Insert</b>		<b>Digital Media</b>	
		<b>Customers Reached</b>	<b># Touches</b>	<b>Customers Reached</b>	<b># Touches</b>	<b>Avg. Click Rate</b>	<b>Customers Reached</b>	<b># Touches</b>	<b>Total Impressions</b>	<b>Total Conversions (Clicks)</b>
2019	2	N/A		2,242,989	2	3.06%	N/A		57,990,787	84,134
2020 (YTD)*	4	840,000	1	5,640,000	3	TBD**	3,300,000	1	24,800,000	724,000
<b>Notes:</b>										
*2020 YTD data is as of July 22, 2020.										
** 2020 average click rate data is not available because direct to customer emails are scheduled through September 2020. Average click rates are calculated as an average over the lifespan of the full campaign and can be reported once 2020 campaign is concluded.										

#### **D. Cost Tracking and Recovery**

D.20-06-003, OP 95 allows the IOUs to establish a memorandum account to track costs associated with implementing the requirements of the decision. PG&E plans to submit a Tier 2 AL to establish a memorandum account to track these costs. To the extent that PG&E incurs incremental costs associated with implementing the activities described in this AL, PG&E intends to track those costs in the memorandum account for future cost recovery.

#### **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 September 7, 2020, which is 21 days<sup>23</sup> after the date of this submittal. Protests must be submitted to:

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

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

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

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

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

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<sup>23</sup> The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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 5.3, and OP 39 of D.20-06-003, this advice letter is submitted with a Tier 3 designation. PG&E requests that this Tier 3 advice submittal become effective upon Commission approval.

### **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.18-07-005. 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/>.

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/S/

Erik Jacobson  
Director, Regulatory Relations

Attachments

cc: Service List R.18-07-005



# 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) #: 4293-G/5916-E

Tier Designation: 3

Subject of AL: Pacific Gas and Electric Company's Plan to Implement Senate Bill 1338's Requirements in Support of the Medical Baseline Program, Pursuant to D.20-06-003, Ordering Paragraphs 39-41

Keywords (choose from CPUC listing): Compliance,

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.20-06-003

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:

No. of tariff sheets: N/A

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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](mailto:PGETariffs@pge.com)

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

**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	