

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4397G/6110E
As of March 25, 2021

Subject: Modifications to the Pacific Gas and Electric Company's On-Bill Financing (OBF) Loan Program Pursuant to D.19-03-001.

Division Assigned: Energy

Date Filed: 03-05-2021

Date to Calendar: 03-10-2021

Authorizing Documents: D1903001

Disposition:	Accepted
Effective Date:	04-04-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

March 5, 2021

Advice 4397-G/6110-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Modifications to the Pacific Gas and Electric Company's On-Bill Financing (OBF) Loan Program Pursuant to D.19-03-001.

Purpose

Pacific Gas and Electric Company (PG&E) submits this Tier 2 Advice Letter, pursuant to Decision (D.) 19-03-001,¹ to extend the provisions of PG&E Advice 4236-G/5805-E through December 2021. This would allow customers to temporarily defer On-Bill Financing (OBF) loan repayments to mitigate the economic impacts of the novel coronavirus (COVID-19) pandemic. PG&E understands that its customers may be experiencing financial hardship and have difficulty paying bills at this time. PG&E seeks authority to continue deferring customer payments on OBF loans through the end of 2021 for those customers experiencing economic hardship.

Background

D. 09-09-047 adopted statewide terms for OBF loans to be offered by PG&E and the investor-owned utilities (IOUs). Energy Division approved PG&E's Advice Letter 3118-G-A regarding PG&E's OBF program.² The OBF loan programs provide zero-percent (0%) interest financing to qualified customers towards the purchase and installation of new energy efficient measures or equipment at the customer's premises. Qualified customers are those customers who meet specified credit criteria and comply with OBF Loan Program requirements.

On March 14, 2019, the Commission issued D.19-03-001, approving changes to PG&E's OBF program and allowing the IOUs to seek modifications to their OBF programs going forward through Tier 2 advice letters. On April 9, 2020, in response to the COVID-19 pandemic, PG&E filed Advice 4236-G/5805-E, requesting the ability to temporarily defer OBF loan repayments for customers experiencing financial hardship. Due to the ongoing

¹ D.19-03-001, Findings of Fact (FoF) 7 and D.09-09-047, Ordering Paragraph (OP) 61.

² Energy Division Disposition Approving PG&E's Advice Letter 3118-G-A regarding *Supplement: Advice Letter Implementing PG&E's On-Bill Financing Program and Updating Emerging Technologies Program Budget*.

nature of the COVID-19 pandemic and the likelihood that customers may still be experiencing economic impacts, PG&E submits this Tier 2 Advice Letter to extend the offer of OBF loan repayment deferral, as approved in Advice 4236-G/5805-E on May 4, 2020, through December 2021.

Summary of Request

PG&E requests authorization to defer OBF loan repayments through December 2021 at the request of customers to help manage financial hardship due to the coronavirus pandemic. PG&E plans to extend this deferral option through the end of 2021 or as otherwise directed by the Commission.

OBF loans repayments are made monthly by participating customers. The charges are integrated into the customer's PG&E bill and carry equal priority to the energy charge. When issued, OBF loans are calculated to be "bill neutral," where the projected monthly energy savings offset the fixed monthly loan installment. The coronavirus pandemic and associated State actions to mitigate the spread of the virus have resulted in many OBF customers experiencing economic hardships due to temporary business closures or reduced operations. Both the impacted revenue of those customers, and the fact that the OBF charge is a fixed charge that does not reduce as operations are curtailed, create a potential financial hardship for customers in repaying their OBF loans.

PG&E seeks authorization to offer customers the ability to continue requesting a loan repayment deferral of 6 months. PG&E would only defer loan payments for those customers who so request. Due to billing system constraints, PG&E would manage the deferrals by: 1) reducing the customer's OBF loan repayment to \$0.01 for the 6-month deferral period; and 2) extending the loan repayment schedule by 6 months so that the full amount of the loan is repaid. For example, if the customer had 12 months remaining on its loan and is currently paying \$100/month, the customer would pay \$0.01 for 6 months following the deferment, \$100 for the next 11 months, and would pay \$99.94 in the final month to complete the repayment of the loan principal.

PG&E is projecting minimal ratepayer impact costs to implement this proposal, as the deferral offering that became effective in April 2020 has resulted in manageable impacts to cashflow so far. The table below shows the impact to date and takes into consideration that available OBF funds in the OBF Revolving Loan Fund (RLF) currently earn interest of approximately 2% per annum.³ The table also calculates the cashflow impact to the RLF and costs to ratepayers of the deferment in consideration of this lost interest.

³ Per (EEFBA-G/EEFBA-E) Energy Efficiency Financing Balancing Account Preliminary Statement 5.b.7; funds in the OBF balancing account earn interest on the average of the balance in the account at the beginning of the month and the balance in the account after above entries are made, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. On April 1, 2020, the annual rate for the three-month Commercial Paper was 2.04 percent.

Table 1. Participation and Financial Impact to Date

Number of participating customers	229
Monthly value of payments deferred to date	\$498,880.49
Total cashflow impact to the RLF to date	\$2,993,282.94
Lost Interest in the RLF resulting from deferments	\$29,932.83

Conclusion

PG&E understands that many customers are still facing economic hardship as a result of the coronavirus pandemic. PG&E seeks to minimize that financial hardship by continuing to authorize OBF repayment deferrals through December 2021, using the criteria and methodology described above.

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 filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 25, 2021, which is 20 days after the date of this filing. 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 via both E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

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

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

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

Effective Date

Pursuant to D.19-03-001 and General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, April 4, 2021 which is 30 calendar days after the date of submittal.

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-13-11-005. 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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List R.13-11-005



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 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) #: 4397-G/6110-E

Tier Designation: 2

Subject of AL: Modifications to the Pacific Gas and Electric Company's On-Bill Financing (OBF) Loan Program Pursuant to D.19-03-001.

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.19-03-001

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: 4/4/21

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

Clear Form

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Semptra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy