

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



January 14, 2022

Advice Letter 4400-G/6115-E

Erik Jacobson
Pacific Gas and Electric Company
Director, Regulatory Relations
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177
PGETariffs@pge.com

**SUBJECT: Pacific Gas and Electric Company (PG&E) Advice Letter 4400-G/6115-E:
Self-Generation Incentive Program (SGIP) Residential Equity Resiliency
Marketing Plan**

Dear Mr. Jacobson,

The Residential Equity Resiliency Marketing Plan provided in Pacific Gas and Electric Company (PG&E) Advice Letter (AL) 4400-G/6115-E is rejected.

Attachment 1 contains a discussion of Energy Division's disposition of PG&E AL 4400-G/6115-E.

Sincerely,

A handwritten signature in black ink, appearing to read 'SB'.

Simon Baker
Interim Deputy Executive Director for Energy and Climate Policy/
Interim Director, Energy Division

January 14, 2022

Attachment 1

Background

On July 16, 2020, the CPUC issued Resolution E-5086 approving with modifications, Pacific Gas and Electric Company's (PG&E's) Self-Generation Incentive Program (SGIP) Residential Equity Resiliency Marketing Plan.¹ Ordering Paragraph (OP) 5 of Resolution E-5086 directed PG&E to submit an updated SGIP Marketing, Education and Outreach (ME&O) plan for 2021 by March 15, 2021.

Pursuant to Resolution E-5086, OP 5, PG&E submitted a 2021 SGIP ME&O Plan in PG&E AL 4400-G/6115-E on March 15, 2021.

PG&E AL 4400-G/6115-E was not protested.

Disposition

Energy Division appreciates PG&E's efforts and attention in developing its proposed 2021 ME&O plan and finds that PG&E AL 4400-G/6115-E is responsive to Resolution E-5086, OP 5. However, the PG&E Equity Resiliency Budget experienced higher than anticipated application rates and was fully reserved by the end of 2020. When this advice letter was submitted on March 15, 2021, all the nearly \$276 million in Equity Resiliency funds were already reserved. As of the date of this disposition, the PG&E Equity Resiliency Budget waitlist includes 80 projects comprising a total estimated incentive value of \$3.4 million.² Given these circumstances, implementing a marketing, education and outreach effort at this time is unnecessary. Further, it would be imprudent to spend ME&O funds to market a program budget that is ostensibly no longer available. Therefore, PG&E AL 4400-G/6115-E is rejected.

¹ As proposed in PG&E Advice Letter 4219-G/5765-E on February 20, 2020.

² SGIP Weekly Statewide Report, www.selfgenca.com, accessed January 3, 2022.

March 15, 2021

Advice 4400-G/6115-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Self-Generation Incentive Plan (SGIP) Residential Equity Resiliency Marketing Plan and Implementation Strategy**Purpose**

The purpose of this letter is to provide a 2021 marketing plan and implementation strategy for Marketing Education and Outreach Plan

Background

In 2020, PG&E conducted a Marketing Education and Outreach (ME&O) campaign focused on helping Medical Baseline and/or low-income customers increase energy resiliency through the Self-Generation Incentive Program (SGIP). The campaign results were successful in educating and ultimately achieving application completes from this audience as highlighted below:

- 19% lift in applications from target audience when outreach was in market.
- 100% of total target audience reached with 28% directly engaged with measurable outreach channels (email and direct mail.)
- 4.3% email engagements resulted in completed applications
- 245 SGIP customers enrolled in the financial assistance pilot

PG&E's 2020 SGIP marketing campaign success was a key contributor to overall program success of fully subscribing the 5-year equity resiliency budget by September 2020 including over 2,100 Medical Baseline and/or low-income customers. As a result, PG&E is now refocusing our 2021 ME&O efforts to educate Medical Baseline and/or low-income customers, on how to safely use their new batteries to maximize their resiliency. In 2020, we learned through our stakeholder ME&O workshop that there was a low level of overall education on battery storage technology.¹ PG&E is applying this learning to inform the outreach plan in 2021

¹ Advice Letter 4219-G/5765-E Appendix A, page 11.

as an important next step to supporting customer resiliency within the customer journey.

A 2021 ME&O outline has been shared with the following stakeholders and their feedback has been incorporated into this Advice Letter.

- CCAs
- Infinity Installer

Marketing Plan

A. Marketing Objective: Educate existing SGIP customers about how to use their new battery storage system to maximize resiliency and safety as well as rate savings by summer 2021.

B. Target Market: Existing Medical Baseline and low-income customers who have received SGIP incentives (qty ~ 2,200) and now have their battery installed.

C. Outreach and Messaging Strategy:

Messaging Strategy: Complement existing installer materials and offer additional education on their battery storage system.

- **Primary Message:** Know how to safely operate your battery and maximize effectiveness.
 - How to use the battery storage modes within the mobile device app
 - Conserve energy use to only critical needs to maximize stored energy
 - Available resources for additional questions
- **Secondary Messages:**
 - You have an opportunity to use your battery storage system to reduce your electricity costs.
 - Get paid for contributing stored energy to other Californians at times of need. Enroll in a demand response program. Note: inclusion of a demand response program message is pending an available program that has eligibility for Medical Baseline Customers.

Tactics:

- *Research:* Talk with customers to confirm education needs. Message test creative to determine ease of understanding and value it adds.
- *Direct Mail/Email:* Highly targeted tactic providing flexibility to educate customers.

- *Printed Collateral:* Provide digestible checklist to using the system before and during a Public Safety Power Shutoff (PSPS) event.
- *Website updates:* Add resources to help customers in an easy to digest way (i.e. a checklist.)

Metrics and Timeline:

Marketing Tactic	In Market Timing	Marketing Key Performance Indicator
Survey/Information-Gathering	April/May	N/A
Direct Mail/Email	July/August	Customers reached: Open rate, Click rate, Website visits
Research – message testing	May/June	Positive response in communication effectiveness
Website	Summer	Visits

Note: in market timing is subject to change pending approval timing of this Advice Letter.

Marketing Budget:

Tactic	Budget (PG&E)
Research	\$80,000
Printed Collateral	\$25,000
Direct Mail	\$50,000
Email	\$50,000
Website	\$10,000
PG&E Marketing Labor	\$50,000
Total	\$265,000

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 April 5, 2021, which is 21 days² after the date of this submittal. Protests must be submitted to:

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

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

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

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

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

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

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

Effective Date

PG&E requests that this Tier 2 advice submittal become effective on regular notice, April 14, 2021 which is 30 calendar days after the date of submittal.

² The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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.12-11-005 and R.20-05-012. 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 R.12-11-005 and R.20-05-012



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) #: 4400-G/6115-E

Tier Designation: 2

Subject of AL: Self-Generation Incentive Plan (SGIP) Residential Equity Resiliency Marketing Plan and Implementation Strategy

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

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

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

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

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 4/14/21

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 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:

**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
Sempra 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