

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4495G/6341E
As of October 19, 2021

Subject: PG&E's Tier 2 Advice Letter Addressing Annual Costs Associated with Development and Deployment of IT & Marketing Strategies for the CHEEF Programs.

Division Assigned: Energy

Date Filed: 09-23-2021

Date to Calendar: 09-29-2021

Authorizing Documents: D2108006

Disposition:	Accepted
Effective Date:	10-23-2021

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

September 23, 2021

Advice 4495-G/6341-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: PG&E's Tier 2 Advice Letter Addressing Annual Costs Associated with Development and Deployment of IT & Marketing Strategies for the CHEEF Programs.

Purpose

Pacific Gas and Electric (PG&E) submits this Tier 2 Advice Letter to the Commission regarding the funding source for annual costs of information technology (IT) development and deployment and of marketing strategies related to the California Hub for Energy Efficiency Financing (CHEEF) programs in 2022-2026, per Ordering Paragraph (OP) 5 of D.21-08-006. PG&E requests Commission authorization to use previously authorized energy efficiency (EE) program funds, to the extent they are unspent and uncommitted to other EE programs, to pay for these costs.

Background

Historically, the California Public Utilities Commission (CPUC) has authorized regulated, investor-owned utilities (IOU's) to offer financial support to customers embracing energy efficiency and clean energy technologies.¹ California's Energy Action Plan² established a hierarchy of energy resources with conservation and EE as preferred.³ Before procuring additional energy production resources, the preferred option for both the environment and ratepayer costs is to use less energy, where feasible. To reach California's energy savings goals, it is necessary to reduce barriers that hinder the adoption of EE and clean energy technologies, particularly in hard-to-reach market segments such as low- and moderate-income customers' homes or rental units, and residential and commercial building retrofits.

¹ A background of the Commission's activities related to clean energy financing was provided as Section 2 of the Order Instituting Rulemaking 20-08-022, as issued by the Commission on September 4, 2020.

² [Final Energy Action Plan \(ca.gov\)](#)

³ See also Cal. Public Utilities (Pub. Util.) Code § 454.5(b)(9)(C), requiring electrical corporations to "first meet its unmet resource needs through all available energy efficiency and demand reduction resources that are cost effective, reliable, and feasible."

Efforts to leverage ratepayer funding to develop innovative programs specifically targeting those hard-to-reach market segments were launched in 2013, when the Commission authorized \$75.2 million in IOU ratepayer funding collected through Public Purpose Program (PPP) surcharges to pilot financing programs to test whether ratepayer-funded incentives could attract private capital to scale investment.⁴ An administrative hub for the pilots, CHEEF, was also established in 2013;⁵ the name “CHEEF” became synonymous with the coordinating body and the programs. D.21-08-006 extended the CHEEF programs through 2026 and granted them additional ratepayer funds.⁶

Pursuant to OP 5 of D.21-08-006, PG&E is submitting this Advice Letter to propose a funding source for its annual costs associated with development and deployment of IT and marketing strategies for the CHEEF programs.

Discussion

OP 5 of D.21-08-006 orders the four IOU’s to submit a Tier 2 Advice Letter covering annual costs associated with development and deployment of information technology and marketing strategies for CHEEF no later than 45 days from the issuance of D.21-08-006:

5. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company shall file a Tier 2 Advice Letter no later than 45 days from the issuance of this decision proposing whether their annual costs associated with development and deployment of information technology and marketing strategies for the California Hub for Energy Efficiency Financing Programs will be paid for with previously-authorized energy efficiency program funds or new, incremental Public Purpose Program funding, with a rationale that explains their funding source(s) for these costs.⁷

PG&E requests Commission authorization to use previously-authorized EE program funds, to the extent they are unspent and uncommitted to other EE programs, to pay for the annual costs associated with the development and deployment of the IT and

⁴ D.13-09-044 authorized \$65.9 million in ratepayer funding, and \$9.3 million in reserved ratepayer funding, for several pilot programs, and authorized the use of ratepayer funds to create credit enhancements intended to incentivize lenders to extend or improve credit terms for IOU ratepayers’ energy efficiency projects. The CHEEF pilot program implementation parameters were modified in D.15-06-008, D.17-03-026, Resolution E-4900, and Resolution E-5072.

⁵ D. 13-09-044, p. 4.

⁶ D. 21-06-008, p. 1; OP 1.

⁷ D.21-06-008, p. 56; OP 1.

marketing strategies for the CHEEF Programs for the five years 2022-2026. The primary justification for using previously authorized EE funds rather than new, incremental funding, is to reduce any unnecessary addition to existing rates.

Based on PG&E's estimate as of July 2021, PG&E expects to have sufficient unspent and uncommitted 2021 EE funds to cover CHEEF-related administration, IT and marketing costs in 2022-2026. PG&E's 2022-23 Budget Advice letter, to be submitted in Q4 2021, will allocate unspent and uncommitted 2021 EE funds to these CHEEF-related IT and marketing costs for 2022-2026.

Protests

*****Due to the COVID-19 pandemic, 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 13, 2021 which is 20 days after the date of this submittal. Protests must be submitted to:

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

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

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

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

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

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

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

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, (and OP 5 of D.21-08-006), this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, October 23, 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.20-08-022. 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/

Sidney Bob Dietz II
Director, Regulatory Relations

cc: Service List R.20-08-022



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) #: 4495-G/6341-E

Tier Designation: 2

Subject of AL: PG&E's Tier 2 Advice Letter Addressing Annual Costs Associated with Development and Deployment of IT & Marketing Strategies for the CHEEF Programs

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.21-08-006

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: 10/23/21

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: Sidney Bob Dietz II, 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

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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