

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4670G/6746E
As of February 24, 2023

Subject: Washington, Hopkins and KNP Complex October 2021 Wildfires Event Emergency
Consumer Protections Summary

Division Assigned: Energy

Date Filed: 10-21-2022

Date to Calendar: 10-28-2022

Authorizing Documents: D1907015

Disposition:	Accepted
Effective Date:	10-21-2022

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

October 21, 2022

Advice 4670-G/6746-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Washington, Hopkins and KNP Complex October 2021 Wildfires Event
Emergency Consumer Protections Summary**

Purpose

Pursuant to Ordering Paragraphs (OP) 6 and 7 of California Public Utilities Commission (Commission or CPUC) Decision (D.) 19-07-015, Pacific Gas and Electric Company (PG&E) submits this advice letter (AL) to conclude the emergency customer protections for residential and small business customers impacted by the Washington, Hopkins and KNP Complex October 2021 Wildfires event. This AL describes the customer impacts from the aforementioned October 2021 Wildfire Events, mandated protections offered to impacted customers, the outreach efforts conducted, and basic metrics, such as the number of customers that received each of the protections and the associated cost.

Background

On October 22, 2021, Governor Newsom issued an Emergency Proclamation for Tuolumne County due to the Washington Wildfire; Mendocino County due to the Hopkins Wildfire; and Tulare County due to the Colony Wildfire and the Paradise Wildfire (collectively referred to as the KNP Complex Wildfire) due to the October 2021 Wildfires event that caused significant damage to critical infrastructure including downed power lines and poles, downed trees, and road closures and damage to roads in Mendocino, Tuolumne and Tulare counties as well as forced the evacuation of thousands of residents.

In compliance with D.19-07-015, OP 2, PG&E submitted Advice 4523-G/6393-E on November 5, 2021 to extend the eligibility of PG&E's Emergency Consumer Protection Plan to include residential and non-residential customers impacted by the Washington, Hopkins and KNP Complex October 2021 Wildfires event. The Commission accepted Advice 4523-G/6393-E effective November 5, 2021.

PG&E offered the following protections to impacted customers for 12 months¹ from the date of Governor Newsom's Emergency Proclamation for the Washington, Hopkins and KNP Complex October 2021 Wildfires event (October 22, 2021 to October 22, 2022):

- Stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency;
- Implement payment plan options for residential customers;
- Support low-income residential customers, in disaster impacted zip codes which may include all zip codes in a county depending on circumstances, by:
 - Freezing all standard and high-usage reviews for California Alternate Rates for Energy (CARE) program eligibility
 - Contacting all community outreach contractors to help better inform customers of these eligibility changes
 - Partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount
 - Indicate how the energy savings assistance program can be deployed to assist impacted customers
 - Suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections
 - Discontinue generating all recertification and verification requests that require customers to provide their current income information

As described below in Section A, there were 5 red-tagged customers² in Mendocino, Tuolumne or Tulare Counties as a result of the Washington, Hopkins and KNP Complex October 2021 Wildfires event. As a result, the following customer protections for red-tagged customers were applicable:

- Waive deposit requirements for residential customers seeking to reestablish service for one year and expedite move in and move out service requests;
- Stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency;
- Identify the premises of affected customers whose utility service has been disrupted or degraded, and discontinue billing these premises without assessing a disconnection charge;
- Prorate any monthly access charges or minimum charges; and
- Suspend disconnections for non-payment and late fee requirements.

PG&E describes the protections offered to impacted customers in further detail below.

¹ D.19-07-015, Conclusions of Law (COL) 10, 14-15.

² Red-tagged customers have homes or businesses that are unserviceable because of the disaster.

Discussion

A. Customer Impacts

PG&E offered protections to affected customers consistent with its addition of the Washington, Hopkins and KNP Complex October 2021 Wildfires event to its Emergency Consumer Protection Plan in Advice 4383-G/6087-E. In total, PG&E identified 8,810 residential and small business³ premises that were impacted by the Washington, Hopkins and KNP Complex October 2021 Wildfires event in Mendocino, Tuolumne and Tulare Counties (7,805 residential 1,005 small business).

B. Overview of Protections Offered to Customers

PG&E's Emergency Consumer Protection Plan offers the protections described in D.19-07-015, Conclusion of Law 14 to customers affected by the Washington, Hopkins and KNP Complex October 2021 Wildfires event in Mendocino, Tuolumne and Tulare counties. PG&E details each protection in further detail below, including the number of customers that received the protections.⁴

1. Stop estimated usage for billing attributed to the period when a home/unit was unoccupied due to a disaster

Resolution M-4833 directs the IOUs to "recalibrate their approach for estimating usage to account for reduced consumption during the period of time the home/unit was unoccupied."⁵ During natural disasters, PG&E identifies general areas that were evacuated and recalibrates its approach for any bills in the area requiring estimation. As a result of the Washington, Hopkins and KNP Complex October 2021 Wildfires event, 91 of the impacted customers in Mendocino, Tuolumne or Tulare counties required adjustments to their estimated bills.

2. Implement payment plan options for residential customers, including customers with employment impacted by a disaster

D.19-07-015 directs PG&E to provide payment plans to customers impacted by a disaster accordingly:⁶

Affected customers who have prior arrearages and have lost their homes or have been displaced and are seeking to establish service in a new residence, shall be offered a payment plan with an initial payment of no greater than 20 percent of the

³ Pursuant to D.19-07-015, PG&E defines small businesses consistent with Electric and Gas Rule 1.

⁴ D.19-07-015, OP 6.

⁵ Resolution M-4833, p. 6.

⁶ D.19-07-015, p. 22. Emphasis added.

amount due, and with equal installments for the remainder of not less than twelve billing cycles. For affected customers who currently have service but go into arrearage, the utilities shall offer a payment plan with an initial payment of no greater than 20 percent of the amount due, and with equal installments for the remainder of not less than eight billing cycles. A customer who is offered a payment plan shall not be precluded from paying off an arrearage more quickly. Interest on a balance shall not accrue.

In accordance with D.19-07-015, PG&E enrolled 1,781 impacted customers (1,673 residential and 108 small business) into favorable payment plans. Note that this total reflects the number of impacted customers enrolled in payment plans at any point since the Washington, Hopkins and KNP Complex October 2021 Wildfires event. As a result, the enrollments may or may not be directly related to the Washington, Hopkins and KNP Complex October 2021 Wildfires event. For example, PG&E auto-enrolled all eligible residential and small business customers into the COVID-19 Relief Payment Plans required by D.21-06-036 in September and October 2021.⁷

Furthermore, PG&E clarifies that it does not charge interest on customer balances.

3. Provide additional support to income-qualified customers

D.19-07-015 requires PG&E to implement the following measures to support income-qualified customers:⁸

- Freezing all standard and high-usage reviews for California Alternate Rates for Energy (CARE) program eligibility
- Contacting all community outreach contractors to help better inform customers of these eligibility changes
- ⊖ Partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount
- Indicate how the energy savings assistance program can be deployed to assist impacted customers
- Suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections
- Discontinue generating all recertification and verification requests that require customers to provide their current income information

The Commission also clarifies in D.19-07-015 that the protections for CARE/FERA customers apply to customers in disaster impacted zip codes, which may include all zip

⁷ D.21-06-036, OPs 2 and 3.

⁸ D.19-05-037, p. 23 and Conclusion of Law 14.

codes in a county depending on circumstances.⁹ PG&E extended the applicable low-income provisions to eligible customers in Mendocino, Tuolumne, and Tulare County. Note that due to the COVID-19 pandemic and pursuant to Resolution M-4849, PG&E extended protections to income-qualified customers through June 30, 2021.

As of May 31, 2022, approximately 3,531 recertifications were paused as a result of the protections in disaster-impacted zip codes. Following the Emergency Proclamation, PG&E suspended all CARE/FERA program removals, froze all standard and high-usage reviews for the CARE program, and discontinued generating all requests for customers to verify their current income information. As a result, PG&E has not removed any CARE/FERA customers in these counties from these programs since the Emergency Proclamation and has frozen all reviews and income verification requests.

In addition, PG&E sent an e-mail to its CARE community outreach contractors to inform them of the protections available to customers impacted by the Washington, Hopkins and KNP Complex October 2021 Wildfires event.

Furthermore, PG&E coordinated with the program administrator of the Relief for Energy Assistance through Community Help (REACH), a PG&E and customer-funded emergency assistance program, to request increasing the assistance cap amount for red-tagged customers from \$300 to \$600. This assistance allows customers who lost their homes to receive additional financial assistance to pay their current utility bill or to set up new service. PG&E informed all REACH agencies of this financial support for customers.

Lastly, income-qualified customers were eligible to qualify for participation in the Energy Savings Assistance (ESA) program under PG&E's modified qualification requirements for a period of one year from the date that the Governor issued a state of emergency proclamation, if the customer lives in these counties and meets one of the following:

- The customer states that they lost documentation necessary for income verification because of the disaster; or
- The customer states that individuals displaced by the disaster reside in the household.

As of May 31, 2022, zero customers in the disaster-impacted zip codes enrolled in the ESA program under these modified qualification requirements.

PG&E communicated the assistance available to income-qualified customers through a variety of channels, including its website (see Section C for more information on customer communications).

⁹ D.19-07-015, p. 23.

C. Customer Communications

D.19-07-015 requires PG&E to conduct outreach to customers about the protections using a mix of tactics to reach customers.¹⁰ This includes community outreach, outbound emails, media advisories, outbound dialing, contact centers, community outreach centers, local governments, targeted outreach to highly impacted customers, city/county assistance centers, trained staff at local assistance centers, partnering with community-based organizations, and communicating protections in accessible formats.¹¹

1. Customer Protections Webpage

Prior to the Washington, Hopkins and KNP Complex October 2021 Wildfires event, PG&E established a dedicated webpage as an on-going resource to help raise awareness about the protections available to customers.¹² Pursuant to OP 8 of D.19-07-015, PG&E made information available on this webpage in Spanish, Chinese, Tagalog, Vietnamese, Korean and Russian.

D.19-07-015 also states that if the Commission adopts language outreach requirements in other proceedings, including adding less prevalent languages, those too shall be adopted as part of PG&E's Emergency Consumer Protection Plan.¹³ In March 2020, the Commission adopted D.20-03-004, which requires PG&E to demonstrate that it conducts community awareness and public outreach before, during, and after a wildfire in any language that is "prevalent" in its service territory, which is defined as a language that is spoken by 1,000 or more people.¹⁴ PG&E Advice 4249-G/5827-E identifies six additional languages that meet this criteria: Arabic, Punjabi, Farsi, Japanese, Khmer, Hmong.¹⁵ PG&E added three more: Thai, Hindi, and Portuguese, for a total of 15 non-English languages.¹⁶ PG&E's customer protections website includes information in these additional languages.

2. Contact Centers

In addition, PG&E's customer service representatives were available to answer any customer questions or concerns regarding the customer protections. PG&E uses a leading translation service provider in the industry, Language Line Services, to provide translation services in over 250 languages (including 10 indigenous languages) in its Contact Centers.

¹⁰ D.19-07-015, COL 23.

¹¹ D.19-07-015, pp. 35-36.

¹² pge.com/consumer-protections

¹³ D.19-07-015, OP 14.

¹⁴ D.20-03-004, OP 1.

¹⁵ Advice 4249-G/5827-E, p. 7.

¹⁶ Pacific Gas and Electric Company's (U 39 E) Compliance Filing Regarding In-Language Outreach In Response to Administrative Law Judge Filing; December 29, 2020.

3. Coordination with Local Government Staff and Elected Officials

PG&E coordinated with local governments on a regular basis by email and phone to provide updates on outage impacts and estimated time of restoration. In addition to these regular updates, PG&E provided additional updates in response to requests from county and city leaders, including elected officials.

D. Coordination with Community Choice Aggregators

D.19-07-015 directs PG&E to coordinate with community choice aggregators (CCAs) during disasters to share information on affected customers.¹⁷ There were 25 CCA customers impacted by the Washington, Hopkins and KNP Complex October 2021 Wildfires event.

E. Collaboration with Cal OES and Cal FIRE

D.19-07-015, OP 7 directs PG&E to “file a Tier 1 Advice Letter twelve months from a qualifying event, detailing the collaborative engagement they had with the Governor’s Office of Emergency Services [CalOES] and the California Department of Forestry and Fire Protection [CAL FIRE] demonstrating information sharing that aided these entities in carrying out their statutory mission.” PG&E did not coordinate with Cal FIRE in response to the Washington, Hopkins and KNP Complex October 2021 Wildfires event. PG&E describes its coordination with CalOES in further detail below.

During the Washington, Hopkins and KNP Complex October 2021 Wildfires event response, PG&E followed its established emergency response approach, during which every activated PG&E emergency center and field facility was organized and operated according to principles embodied in the Incident Command System (ICS). ICS is a standard emergency incident management system used by governmental, private and non-profit emergency response entities across the globe. Both the National Incident Management System, developed by the Federal Emergency Management Agency (FEMA), and the Standardized Emergency Management System, developed by CalOES, align to include ICS as the incident response framework of both systems.

Because the Command structures of PG&E’s Emergency Operations Center,¹⁸ Electric Operations Emergency Centers (OECs),¹⁹ base camps, and other emergency facilities

¹⁷ D.19-07-015, Conclusion of Law 18.

¹⁸ PG&E Emergency Operations Center previously operated from PG&E’s General Office in San Francisco. The Vacaville Emergency Response Center (VERC) is now PG&E’s primary physical Emergency Operations Center (EOC).

¹⁹ PG&E activated all 19 OECs. OECs are strategically located to cover each division of PG&E’s service territory. The OECs provided emergency response support at the local level, directing and coordinating resources needed to assess damage, secure hazardous situations, restore service safely, and communicate the status of recovery efforts internally.

are similar to those of other agencies' emergency response facilities, PG&E officials can work directly with their counterparts at other agencies.

The ICS Organization for the Washington, Hopkins and KNP Complex October 2021 Wildfires event was staffed with an EOC Commander and a Command Staff, which included:

- A safety officer, who disseminated safety information, conducted daily safety briefings and tracked safety incidents in the base camp;
- A public information officer, who handled public information requests from the EOC and from external media outlets;
- A customer strategy officer, who served as an advocate for customers impacted by the fire and communicates with customers;
- A legal officer, who monitored compliance with regulatory and reporting processes and assisted in incident investigations;
- A human resources officer, who managed human resource and workforce needs;
- A liaison officer, who facilitated communication among PG&E, the CPUC, CalOES, and other municipal and county emergency responders. CPUC and CalOES personnel were present in the EOC; and
- Operations, planning, logistics, and finance and administrative staff.

F. Emergency Customer Protections Memorandum Account

Pursuant to D.19-07-015, OP 4, PG&E recorded incremental costs associated with offering the required protections in the ECPMA. As of May 31, 2022, PG&E has recorded approximately \$15,428 to the ECPMA to identify customers impacted by the Washington, Hopkins and KNP Complex October 2021 Wildfires event.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than November 10, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
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 and 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, and OPs 6 and 7 of D.19-07-015, this 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 October 21, 2022.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically shown on the attached list and the parties on the service list for R.18-03-011. 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 of R. 18-03-011



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: 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) #: 4670-G/6746-E

Tier Designation: 1

Subject of AL: Washington, Hopkins and KNP Complex October 2021 Wildfires Event Emergency Consumer Protections Summary

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.19-07-015

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: 10/21/22

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

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.
Braun Blaising Smith Wynne, P.C.
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
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
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

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
McClintock IP
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.

Resource Innovations

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
Stoel Rives LLP

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