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

Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4730G/6901E
As of May 8, 2023

Subject: Post Enrollment Verification Outbound Call Pilot

Division Assigned: Energy

Date Filed: 03-31-2023

Date to Calendar: 04-07-2023

Authorizing Documents: D2106015

Disposition:	**Accepted**
Effective Date:	**04-30-2023**

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

STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

Pacific Gas and Electric Company®

Sidney Bob Dietz II
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
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San Francisco, CA 94177

Fax: 415-973-3582

March 31, 2023

Advice 4730-G/6901-E
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: **Post Enrollment Verification Outbound Call Pilot**

Purpose

In accordance with Ordering Paragraph (OP) 13 of Decision (D.) 21-06-015, Pacific Gas and Electric Company (PG&E) hereby submits to the California Public Utilities Commission's (Commission) this Tier 2 Advice Letter (AL) summarizing the findings of its Post Enrollment Verification (PEV) Outbound Call Pilot (PEV Pilot) to assist participants of the California Alternate Rates for Energy (CARE) program who may need additional support to complete the paperwork needed to verify program eligibility.

Background

In D.21-06-015, the Commission directed PG&E, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company (collectively, the Investor-Owned Utilities, or IOUs) to simultaneously conduct a six to twelve-month outbound call pilot to assess whether such service would minimize the PEV de-enrollments for those households that qualify for CARE.[1] The Commission further specified that the funding for the pilot shall not exceed $80,000 per IOU.[2] Additionally, the Commission required each IOU to submit a Tier 2 Advice Letter within three months of the pilot's conclusion. The Commission also provided the criteria under which the Energy Division will review and dispose of the IOUs' Tier 2 AL to determine whether the pilot was *"cost-effective, had an average monthly success rate of at least 10 percent or provided other benefits to customers participating in the pilot"* to continue on a pilot basis or a permanent basis.[3]

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[1] D.21-06-015 OP 13 and at p.41.
[2] D.21-06-015 at p.41.
[3] D.21-06-015 at p.42.

Discussion

PG&E's PEV Outbound Call Pilot

PG&E's PEV Pilot launched in June 2022 and concluded in December 2022 with a total direct cost of $77,765 over the six-month period. PG&E designed its pilot to lend direct support to customers who submitted incomplete or incorrect CARE PEV documentation required to confirm their program eligibility to remain on the CARE program. Additionally, the customers reached through this pilot were provided with information on other income-qualified energy savings programs that PG&E administers or partners with.

This direct support process is outlined below:

- A PG&E Customer Service Representative (CSR) places direct calls to customers who submitted incomplete or incorrect PEV documentation to PG&E.
- If a customer contact is made, the CSR discusses and provides direction regarding the customer's specific documentation requirements, answers questions, provides additional information regarding the PEV process and offers information on other programs available to the customer.
- If the CSR is not able to reach the customer on the first attempt, the CSR would place a second follow-up call to the customers unreachable during the initial call phase the following week.
- CSRs document customer engagement call results or outcomes.

The results of the pilot are summarized within this AL, in accordance with the criteria established by the Commission in D.21-06-015.[4]

Advice Letter Criteria: Call Summary

- *Number of CARE households that submitted incorrect PEV documentation or "attempted but failed" to verify during the pilot.*
- *Number of these households contacted by the Outbound Call Pilot.*
- *Number of these households successfully ushered through PEV process by the Outbound Call Pilot.*
- *Success rate (households successfully ushered through PEV process after attempting but failing on their own, divided by total households contacted through effort) broken down by month and for the overall pilot.*

Pilot Results: Call Summary

From June to December 2022, the CSRs contacted all 6,476 households that returned incomplete PEV documentations and reached 2,969 or 46% of the households. Of the 2,969 households reached, the CSRs successfully helped 1,387 or 47% of customers reached with completing the PEV process to remain on the CARE program. The overall

[4] D.21-06-015 at pp.41-42

success rate of households that completed the PEV process within 45 days of receiving a call or voice message was 21%. For comparison, the rate of successful PEV completion for PG&E customers before the PEV pilot was 7% in 2019.[5] These early results indicate that the personalized approach of the PEV pilot could be an effective strategy to enable qualified customers to remain on CARE. The monthly results are summarized in Table 1.

Table 1: PEV Pilot Summary Results from June 2022 through December 2022

Month/ Year	Total Number of Households Returned Incomplete PEV Documentation ("Attempted but Failed")	Number of Households Contacted [Note 1]	Number of Households Reached (CSR left voice message or spoke with HH)	Number of Households who Successfully Completed the PEV Process within the 45 days	Success Rate (Number of PEV Completed / Total Number of "Attempted but Failed" or Contacted)
Jun-22	1,413	1,413	573	113	8%
Jul-22	858	858	429	30	3%
Aug-22	1,695	1,695	676	340	20%
Sep-22	813	813	289	28	3%
Oct-22	514	514	252	415	81%
Nov-22	718	718	436	185	26%
Dec-22	465	465	314	276	59%
Total	**6,476**	**6,476**	**2,969**	**1,387**	**21%**

[Note 1]: D.21-06-015 defines Success Rate as households successfully ushered through PEV process after attempting but failing on their own, divided by total households contacted through effort. PG&E's PEV Pilot made attempts to contact every "attempted but failed" household, PG&E believe the success rate is more appropriately captured using the number of PEV completed over the total number of "attempted but failed" households as "contacted" rather than the number of the households "reached". PG&E believes if the "success rate" were to be calculated based on the number of households that were reachable (i.e., households with correct phone numbers on file) it would inflate the overall success rate of the pilot.

Advice Letter Criteria: Costs and Benefits

- *Cost-benefit analysis of pilot, including the incremental cost associated with the expansion of outbound calls and the estimated marketing/ outreach/ admin funds saved from having to avoid recapturing eligible households who failed PEV.*
- *Other benefits customers received by participating in this pilot, if any.*

Pilot Results: Costs and Benefits

The total cost of the pilot is $77,765, or $56 per "attempted but failed" household that successfully submitted the required PEV paperwork to remain eligible in the program.

[5] 2019 is the last full year of complete PEV data available. PEV was paused in 2020-2021 as part of COVID emergency protections.

This cost accounts only for the expenditure associated with the outbound call services provided by CSRs; it does not include other administrative costs associated with the pilot.

PG&E also found that multiple call attempts were often required to establish direct connection with customers.

Table 2: PEV Pilot Cost

Total Pilot Cost	# of Household Successfully Completed the PEV Process	Cost ($) / Household
$77,765	1,387	$56

PG&E does not have a viable way to systematically track customers who have failed PEV over time, therefore PG&E is unable to provide estimated savings or avoided Marketing and Outreach (M&O) costs associated with recapturing eligible households who failed PEV. However, as a point of reference, the average M&O cost for a new CARE enrollment was approximately $29 in 2021.[6]

PG&E further estimates potential savings of $69 per household per month in our Billing Operations Department with the reduction of re-billing accounts to reinstate the CARE discount due to the customer being dropped from the CARE program as a result of the customer not providing PEV documentation within the required 45 days, but then submitting complete PEV information later. These savings are summarized in Table 3.

Table 3: PEV Outbound Calling Campaign Incremental Savings and Benefits

Average M&O Cost per New CARE Enrollment Program Year (PY) 2021	Estimated Billing Operations Re-Bill Savings	Other Non-monetary Benefits
$29 / Household	$69 / Household / Month	Personalized support; enhanced customer experience

Additionally, customers reached through the PEV Pilot received one-on-one customer support from the CSRs which enhanced their customer experience. Through the PEV Pilot, customers were able to interact with live agents who could answer questions that were unique to the customers' circumstances and provide guidance to complete the PEV process. Additionally, the CSRs could explain the financial benefits of submitting the correct paperwork for future PEV requirements in maintaining their CARE program

[6] As reported in PG&E's 2021 CARE Annual Report, PG&E's PY 2021 CARE M&O expenditures totaled $6,007,492 and new CARE enrollments (including automatic enrollments and self-certifications) totaled 207,062 customers, resulting in an average cost of $29.01 per new enrollment. PG&E provides this figure as an illustrative proxy amount, and it does not account for administrative costs, nor count recertified customers into the new enrollments.

eligibility and provide information about other assistance programs (e.g., Energy Savings Assistance (ESA) Program, Relief for Energy Assistance through Community Help (REACH), and Low Income Home Energy Assistance Program (LIHEAP)) that the customers may not have previously been aware of. PG&E is not quantitatively capturing the additional benefits of enrollment into these complementary programs in this analysis.

The CSRs who conducted the outbound calls reported that many of the customers they spoke to expressed appreciation for the extra support received through the PEV process to retain their CARE discount.

Advice Letter Criteria: Recommendation, Lessons Learned, and Best Practices

- *Recommendation on whether the pilot should conclude, be continued, expanded, or turned into a permanent effort, and the reasons why (i.e., low results, not cost effective). If the IOUs propose to continue the outbound call center efforts either on a pilot basis or a permanent basis, the IOUs shall describe the long term plan for the effort including how many households it anticipates targeting, capturing, and re-enrolling back onto CARE each year, and the proposed long-term budget. The recommendation should also include lessons learned and best practices for continuing the pilot.*

Pilot Results: Recommendation, Lessons Learned, and Best Practices

Based on the results of the 6-month pilot, PG&E requests Commission's approval to continue its PEV Pilot from May to December 2023 for a total budget of $100,000.[7] The budget to support the pilot continuation for PY 2023 will be reallocated from PG&E's already-approved M&O funds for 2023 (i.e., PG&E is not requesting additional funds beyond what was approved in D.21-06-015). While PG&E's PEV Pilot has shown relative success with supporting customers who experienced difficulties with the PEV process, PG&E believes there is room for improving its PEV outbound call program model and collecting additional data for PY 2023 before considering a permanent implementation of such a model. Furthermore, in R.22-07-005, the Commission will be evaluating various income graduated fixed charge proposals and the Final Decision in that proceeding will likely impact long term approaches to PEV in this program cycle.

PG&E estimates that an average of 1,100 households will submit incomplete or incorrect PEV documentation each month. Upon the Commission's approval to extend the PEV Pilot through 2023, PG&E projects it would be able to provide one-on-one assistance to

[7] PG&E's authorized CARE Outreach Budget is $7,987,200 for PY 2023. The proposed amount for continuing the pilot is $100,000, which is well below the not-to-exceed limit of $479,232, or six percent of the IOUs' total authorized CARE Outreach budget (as specified in D.21-06-015, at pg. 43). The $100,000 was determined by the estimated number of PEV to be completed in the 8-month pilot extension (1,800) multiplied by the average $56 per household cost from the Pilot. ($100,800).

8,800 “attempted but failed” households, and retain 1,800 on the CARE program (Table 4).

Table 4: PEV Pilot Summary and Proposed Scope of Pilot Extension

	Pilot (6-month) Actual	**Extend Pilot (8-month)** Projected #
# of “Attempted but Failed” Household	6,476	8,800
# of PEV Completed	1,387	1,800
Total Cost	$77,765	$100,000

PG&E believes that extending the pilot for an additional eight months would enable PG&E to continue to provide personalized help to CARE customers who need additional support to complete the PEV process. PG&E would also apply the lessons learned from the initial PEV Pilot to further refine its outbound call program design to improve administrative efficiency and enhance program delivery. For example, the pilot reported 54% of the “attempted but failed households” were not reachable and, of those that were, 21% still submitted incomplete or inaccurate documents. PG&E intends to review its outbound call process to identify touchpoints where customer communication methods and strategies could be improved upon to achieve better outcomes.

PG&E timely submits this AL and provides information consistent with the requirements identified in the Decision.

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than April 20, 2023, 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 5.2, and OP 13 of D.21-06-015, 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 30, 2023, 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 to parties shown on the attached list and the parties on the service list for A.19-11-003, et al. 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: A.19-11-003, et al.

California Public Utilities Commission

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) #: 4730-G/6901-E

Tier Designation: 2

Subject of AL: Post Enrollment Verification Outbound Call Pilot

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.21-06-015

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: 4/30/23

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 proposed[1]: N/A

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

[1]Discuss in AL if more space is needed.

Clear Form

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: Sidney 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
Downey Brand LLP
Dish Wireless L.L.C.

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

GenOn Energy, Inc.
Green Power Institute
Hanna & Morton
ICF
iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
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