

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4793G/7011E
As of October 5, 2023

Subject: Detailed Santa Nella Utility Conversion Project Evaluation Plan in Compliance with Decision 23-04-057

Division Assigned: Energy

Date Filed: 08-25-2023

Date to Calendar: 09-06-2023

Authorizing Documents: D2304057

Disposition:	Accepted
Effective Date:	09-24-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(279)789-6209

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

August 25, 2023

Advice 4793-G/7011-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Detailed Santa Nella Utility Conversion Project Evaluation Plan in Compliance with Decision 23-04-057

Purpose

Pacific Gas and Electric Company (PG&E) submits this Tier 2 advice letter to detail the Implementation and Outreach Plan for the Santa Nella Utility Conversion (SNUC) Project pursuant to Ordering Paragraph 7 of Decision (D.) 23-04-057.

Background

On September 21, 2022, the California Public Utilities Commission (CPUC or Commission) issued an Order Instituting Investigation (OII) to Address the Potential Loss of Natural Gas Service for a Portion of the Santa Nella Community (I.22-09-011). The Santa Nella Community at issue in this proceeding consists of a subdivision of 280 parcels, on which 270 manufactured homes and 10 vacant lots are located. Originally all of the parcels were part of a mobile home park (MHP). However, over time 233 of the parcels were sold and became independently owned. Currently, 47 manufactured homes remain part of the MHP. Currently SNME, Inc. (SNME), a private corporation, receives natural gas from a PG&E master meter, and SNME serves natural gas to all 270 manufactured homes in the Santa Nella community, including the 233 homes that are not part of the MHP.¹ On May 19, 2022, SNME informed the Commission and PG&E that it was on the verge of filing for bankruptcy and would soon no longer be able to serve natural gas to the community. PG&E offered three options² for replacing the infrastructure impacting the Santa Nella community in its pleadings in this OII. On April 27, 2023, the CPUC issued D.23-04-057, ordering PG&E to replace the gas infrastructure in order to offer direct metered gas service, perform electric upgrades, and offer full electrification to the customers in the Santa Nella community. The CPUC ordered PG&E to file this Letter with details of its Evaluation Plan. The Commission is interested in any data that is

¹ PG&E provides electric service to the Santa Nella Community.

² The options included (1) replacing the gas infrastructure and converting to direct metered service at a forecast cost of \$5.89 million, (2) replacing the gas infrastructure and upgrading the electric infrastructure at a forecast cost of \$11.03 million, or (3) fully electrifying the Santa Nella community at a forecast cost of \$14.2 million.

gathered from this pilot implementation to inform future efforts directed by the Commission. However, it is also noted that the direction adopted in this decision should not be considered precedential for the consideration of other master meter systems in California³.

Santa Nella Utility Conversion Project Evaluation Plan (Plan)

In accordance with Ordering Paragraph 7 of Decision (D.) 23-04-057, PG&E is filing Attachment 1: Santa Nella Evaluation Plan to describe how PG&E plans to evaluate the SNUC project, to inform future electrification efforts. As outlined in Section 2 of the Plan, PG&E shall submit an Electrification Uptake Report and a Pre/Post Electrification Report. The former will report on the adoption of electrification at Santa Nella and reasons for customer choice. The latter will compare pre and post electrification energy usage and cost. In the Plan, PG&E also explains evaluation criteria and timeline of evaluation.

Tariff Revisions

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 September 14, 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 (GO) 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

³ D.23-04-057, Section 10, Page 44-45

which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to GO 96-B, Rule 5.2 and OP 7 of D.23-04-057, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, September 24, 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 I.22-09-011. 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
CPUC Communications

Attachments

Attachment 1: Santa Nella Evaluation Plan

cc: Service List I.22-09-011



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 #: (279)789-6209

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) #: 4793-G/7011-E

Tier Designation: 2

Subject of AL: Detailed Santa Nella Utility Conversion Project Evaluation Plan in Compliance with Decision 23-04-057

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.23-04-057

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: 9/24/23

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 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

Attachment 1

Santa Nella Evaluation Plan

Santa Nella Utility Conversion Project Evaluation Plan

1. Introduction

This Evaluation Plan describes how Pacific Gas and Electric Company (PG&E) plans to evaluate the Santa Nella Utility Conversion Project, in Santa Nella, California, approved and ordered in California Public Utilities Commission's (CPUC's or Commission's) Decision D.23-04-057 (Decision), to inform future electrification efforts. PG&E will first submit an Electrification Uptake Report¹ followed by the Pre/Post Electrification Report². As stated in the Decision, the Commission directs PG&E to convert the Santa Nella community currently served by SNME, Inc. (SNME) to direct utility gas service and simultaneously upgrade the existing PG&E electric infrastructure, as well as offer households an electrification option. Details on how PG&E plans to implement and perform outreach on the project can be found in Advice Letter 4782-G/6998-E.

This Evaluation plan represents PG&E's best available information at the time of filing and is subject to change.

2. Reports

The Decision states in Section 11.1,

"It would also be beneficial to have data about uptake of the electrification option and PG&E feedback about customer responses gathered during the option provision after implementation is complete. Within 120 days after completion of final implementation of the gas and electric work directed by this decision, PG&E shall compile a report containing this information and serve it on the service list of this proceeding as well as R.15-03-010 and R.18-04-018."

Ordering Paragraph 7 of the Decision states the following,

"Pacific Gas and Electric Company shall file two Advice Letters related to implementation: the first shall detail an Implementation and Outreach Plan prior to beginning work, to be filed within 90 days of the adoption of this decision, and the second shall detail an Evaluation plan for collecting at least 12 months of data each on pre-and-post-electrification energy costs and usage, to be filed within 120 days of the adoption of this decision."

In correspondence outside of the Final Decision, the Commission notes that the Decision language is not clear and clarifies that PG&E is to file two evaluation reports: Electrification Uptake Report and a Pre/Post Electrification Report. The former will be filed 120 days after completion of electrification on the last home, to report on the uptake of electrification and PG&E feedback about customer responses gathered during the conversion.

The latter will be filed 16 months after the completion of electrification on the last home to compare pre-and-post-electrification energy costs and usage. The date of submission of this report is not explicitly noted in the Decision. PG&E will require 12 months of energy usage and

¹ D.23-04-057, Section 11.1, Page 49

² D.23-04-057, Ordering Paragraph 7, Page 64

cost data after the completion of electrification of the last home and an additional 4 months to compile the report, for a total time frame of 16 months.

2.1. Electrification Uptake Report

The Electrification Uptake Report will include analysis and information on the following data points, including but not exclusive to:

- Breakdown of population choice (i.e percentage of population that opt in, percentage of population that deny electrification, percentage of population that opt in but property is deemed unfeasible for electrification, percentage of population that opted out after assessment, percentage of population that opt in and successfully electrify).
- Reasons for choosing electrification.
- Reasons for denying electrification.
- Breakdown of characteristics of mobilehomes.

2.2. Pre/Post Electrification Report

The Pre/Post Electrification Report will include analysis and information on the following data points pertaining to mobilehomes at Santa Nella that are deemed feasible and successful complete electrification, including but not exclusive to:

- Average increase/decrease of energy usage per square foot.
- Percentage increase/decrease of energy usage per square foot.
- Average increase/decrease of energy usage per household.
- Average increase/decrease of cost per square foot.
- Percentage increase/decrease of cost per square foot.
- Percentage increase/decrease of cost per household

3. Evaluation Criteria

3.1. Energy Costs

PG&E will request 12 months of pre-electrification energy costs from SNME Inc., from the date of the completion of the last electrification. SNME Inc. has stated to PG&E that records of cost of energy usage by coach, which have been kept by SNME Inc. to accurately distribute bills to residents, can be made available, at the time of request. The pre-electrification costs will then be compared to the costs incurred by residents in the 12 months after the date of completion of electrification of the last home.

PG&E cannot affirm the availability and accuracy of data received from the privately owned SNME Inc. PG&E will put forth its best effort to work with SNME to obtain sub metered gas usage and cost to determine pre electrification data.

3.2. Energy Usage

PG&E will request 12 months of pre-electrification energy usage data from SNME Inc., from the date of the completion of the last electrification. SNME Inc. has stated to PG&E that records of

energy usage by coach, which have been kept by SNME Inc. to accurately distribute bills to residents, can be made available, at the time of request. The pre-electrification energy usage will then be compared to the energy usage of residents in the 12 months after the date of the completion of the last electrification.

PG&E cannot affirm the availability and accuracy of data received from the privately owned SNME Inc. PG&E will put forth its best effort to work with SNME to obtain sub metered gas usage and cost to determine pre electrification data.

3.3. Uptake of Electrification

The Commission is interested in the uptake of electrification at the Santa Nella Community³. PG&E will be able to provide data on the following:

3.3.1. Population that opts in for electrification

Data on the population that opts in for electrification will be readily available immediately after the Outreach phase of the project, as applicants will indicate interest on the Santa Nella Application⁴.

3.3.2. Population that opts in for electrification but deemed unfeasible

The Electrification Implementor, the vendor responsible for performing the BTM Electrification upgrades, will be assessing the mobilehomes that have indicated interest in electrification, for general safety issues that may exist, remediation needs, existing appliances, and installation feasibility of electrification measures⁵. The reason for a home's unsuitability for electrification will be documented and shared with PG&E. Reasons may include, but is not exclusive to, excessive remediation required, customer or landlord refusal, etc.

3.3.3. Population that opts in and successfully converts to all electric

The Electrification Implementor will be able to document and share the number of mobilehomes that have successfully completed the BTM Electrification upgrade, along with the level of remediation and any measures taken.

3.4. Customer Choice

The Commission has also requested PG&E feedback about customer responses gathered during the option provision⁶. PG&E will be able to procure this data when applicants input their choice of Full Electrification and the reason for their chosen response.⁷

³ D.23-04-057, Section 11.1, Page 47.

⁴ PG&E AL 4782-G/6998-E, Santa Nella Utility Conversion Project Application, Page 21.

⁵ PG&E AL 4782-G/6998-E, Section 3, Page 9.

⁶ D.23-04-057, Section 11.1, Page 47.

⁷ PG&E AL 4782-G/6998-E, Page 21.

3.5. General Household Characteristics

Along with energy usage and cost data, the Commission seeks to collect information on general household characteristics in the Santa Nella Community⁸. PG&E will collect a range of household demographic and building characteristics for households from submitted Applications. This will inform the landscape of electrification customers and provide baseline characteristics to aid the energy and bill impact analysis. Characteristics include, but may not be limited to:

- Approximate Footage of Living Space.
- Approximate Age of Home.
- Ownership status.
- Existing Electric Appliances.
- Existing Gas Appliances.
- Existing Propane Appliances.
- Existing Wood Appliances.

4. Timeline of Evaluation

Data used in the Evaluation will be gathered in the following periods on the estimated timeline⁹:

1. Outreach
Data outlined in Section 3.4 (Customer Choice) and 3.5 (General Household Characteristics) will be collected in this period by leveraging the inputs on the Santa Nella Utility Conversion Project Application.
2. Full Electrification Assessments/Home Treatment Plan
Data outlined in Section 3.3 (Uptake of Electrification) will be collected in this period by the Electrification Implementor.
3. Twelve months after the completion of Full Electrification Installations
Data outlined in Section 3.1 and 3.2 will be requested and collected for each home, 12 months after the completion of electrification of the last home.

⁸ D.23-04-057, Section 11.1, Page 47.

⁹ PG&E AL 4782-G/6998-E, Section 2, Page 8.

**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 Community Choice Association
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

Electrical Power Systems, Inc.
Fresno
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
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