

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



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 5726G
As of December 16, 2020

Subject: The Southern California Gas Company's Self-Generation Incentive Program Marketing Education and Outreach Plan

Division Assigned: Energy

Date Filed: 11-10-2020

Date to Calendar: 11-13-2020

Authorizing Documents: None

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Effective Date:	12-10-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

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PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
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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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



Ronald van der Leeden
Director
Regulatory Affairs

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November 10, 2020

Advice No. 5726
(U 904 G)

Subject: The Southern California Gas Company's Self-Generation Incentive Program Marketing Education and Outreach Plan

Southern California Gas Company (SoCalGas) hereby submits this Advice Letter for approval by the California Public Utilities Commission (Commission or CPUC) for a Marketing, Education, and Outreach Plan (ME&O Plan or Plan) for SoCalGas's Self-Generation Incentive Program (SGIP).

Purpose

This Advice Letter is provided pursuant to the recommendations included in the disposition letter for Advice No. 5589-A from Energy Division staff,¹ which recommended each SGIP Program Administrator (PA) to submit their territory-specific SGIP ME&O Plan.

Background

Senate Bill 700 (Wiener, 2018) extended annual collections for the SGIP for five additional years, from December 31, 2019, through December 31, 2024, and extended the administration of the program for five additional years, from January 1, 2021, to January 1, 2026. The Commission also directed that any unallocated funds as of January 1, 2026 be returned to ratepayers.

On September 18, 2019, the Commission issued Decision (D.) 19-09-027 which established an SGIP Equity Resiliency Budget, modified existing Equity Budget incentives, approved carry-over of accumulated unspent funds, and approved \$10 million to support the San

¹Non-standard Disposition Letter issued on April 9, 2020 approving SoCalGas Advice No. 5589-A, et al. (Supplemental Advice Letter of Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), Center for Sustainable Energy (CSE) and Southern California Gas Company (SoCalGas), collectively the Joint Program Administrators (PAs), to address topics raised in protests filed March 9, 2020, to the Joint PA Advice Letter, "Proposed Revisions to the Self-Generation Incentive Program Handbook to Further Incorporate Requirements Pursuant to Decision 19-09-027," submitted by the Joint PAs on February 18, 2020).

Joaquin Valley (SJV) Disadvantaged Communities (DAC) Pilot Projects. This decision included a number of modifications to SGIP for the accumulated unused funds such as the establishment of a \$100 million equity resiliency budget using accumulated unused generation technology funds, directed PAs to develop a customized equity budget ME&O Plan using ten percent of their accumulated unused administrative budgets, and recommended convening a workshop with Commission staff and disability rights advocates to aid in the development of such a plan.

On December 5, 2019, the PAs requested and were approved to submit the implementation of Ordering Paragraph (OP) 7 from D.19-09-027 via two separate Advice Letters. On December 17, 2019, the first of these implementation Advice Letters was submitted with an initial statewide ME&O Plan focusing on the residential market.²

A ME&O Workshop was held on January 14, 2020 with key stakeholders, including Energy Division staff and disability advocates, to discuss ideas and considerations for incorporation of a statewide Equity Resiliency ME&O Plan. Subsequent to the ME&O workshop, D.20-01-021, *Self-Generation Incentive Program Revisions Pursuant to Senate Bill 700 and Other Program Changes*, was issued on January 27, 2020, which expanded the eligibility to customers who have experienced two or more Public Safety Power Shutoff (PSPS) events identifying additional customers that could apply for the equity resiliency budget.

On February 18, 2020, the PAs submitted the second implementation Advice Letter, which included a comprehensive statewide ME&O Plan to help PAs reach target audiences, based on the feedback received by stakeholders at the ME&O Workshop. The PAs' target audience are equity resiliency customers and those most vulnerable to PSPS or other outage events.

Effective April 9, 2020, a non-standard disposition letter was issued by Energy Division staff that approved the SGIP PAs' Advice Letters in compliance with OP 7 of D.19-09-027 and recommended that each PA submit their own ME&O Plan specific to their service territory.³

Marketing Plan

The following marketing plan describes the intended implementation features and strategies of the ME&O efforts within the SoCalGas service territory for SGIP. SoCalGas's plan identifies the avenues and necessary resources for implementing customer outreach to eligible SGIP participants with a focus on equity customers and resiliency technologies, especially in those areas categorized as vulnerable communities.

² SoCalGas Advice No. 5555, et al., Proposed Revisions to the SGIP Handbook to Incorporate a New Equity Resiliency Budget for Residential Customers (Systems = 10 kW) Including Changes to Incentive Structures, Program Requirements, ME&O Plan, and Budget Allocations Pursuant to D.19-09-027, approved in a Disposition Letter issued on February 26, 2020.

³ See Footnote 1.

Objectives

- Encourage SGIP program enrollments focusing on customers eligible for either of the equity or equity resiliency incentive funds.
- Educate on the benefits, limitations, and considerations of all eligible SGIP technologies with a focus on the resiliency expectations of equity customers.
- Educate qualified participants regarding both equity and resiliency eligibility criteria and program verification requirements.
- Complementing SCE's ME&O plan, SoCalGas will target municipal customers (not served by SCE) within SoCalGas service territory, prioritizing the most vulnerable customers.

Target Market Approach

The targeted markets have been identified as the following customer segments within the SoCalGas service territory, with a focus on SoCalGas customers served by a non-electric Investor Owned Utility, further extending SGIP outreach efforts.

- Residential customers on a Medical Baseline rate or other residential customers with a serious illness or condition that could become life threatening if service is disconnected;
- Residential customers participating in low-income programs such as California Alternate Rates for Energy (CARE), Medical Baseline, Energy Savings Assistance (ESA), relying on an electric well pump for water supplies, or eligible and reserved for either Multifamily Affordable Solar Housing (MASH), Single Family Affordable Solar Homes (SASH), SASH for DAC (DAC-SASH) or Solar On Multifamily Affordable Housing (SOMAH) programs;
- Customers located in DACs, which includes Indian Country;⁴
- Residential customers residing in Tier 3 or 2 High Fire Threat Districts (HFTDs) or customers impacted by 2 or more PSPS events;⁵ and
- Nonresidential customers located in Tier 3 or 2 HFTDs qualifying as critical facilities or critical infrastructure⁶ serving DACs or low-income communities or impacted by PSPS events.

Outreach Channels and Methods

SoCalGas has identified the following outreach channels:

- Community Based Organizations (CBOs);
- Company Low-Income Programs: CARE, Medical Baseline, and ESA;

⁴ D.19-09-027 at 11: Indian Country is an area not included by CalEnviroScreen as a DAC because of low levels of industrial pollution and vehicle emissions, however, because of its remoteness often experience poor electric service reliability, hence the Commission included California Indian Country as a DAC for the purposes of SGIP equity budget.

⁵ Focus will be to identify customers in HFTD 3 or 2 as municipal electric provider service territories are not known to have established "PSPS" events.

⁶ SGIP Handbook definition in 4.1.1.3. Host Customer Eligibility for the Equity Resiliency Budget.

- Account representatives for large SoCalGas non-residential customers and chain accounts;
- Outbound email campaigns;
- Digital platforms; and
- Direct mail.

Through the channels identified above, SoCalGas aims to employ the following methods:

- Extend existing CBO⁷ contracts with a nexus to SoCalGas' most vulnerable equity resiliency eligible customers, focusing in the areas outside of SCE's service territory.
- Leveraging existing Company customer messaging channels. Seek to co-promote SGIP incentives with Company programs and groups such as:
 - Low-Income: CARE, Medical Baseline, and ESA;
 - SoCalGas community relations and public affairs staff;
 - Account Representatives for non-residential customers; and
 - Collaboration with customer facing SoCalGas representatives (e.g., Regional Public Affairs, Low-Income Program).
- Enhancing socialgas.com webpage content.
- Employing direct messaging tailored to specific markets via email messaging or direct mail campaigns.
- Utilizing SoCalGas digital media outlets (i.e., Facebook, twitter).

Messaging Strategy

Messaging to include benefits of resilient power during a PSPS event, SGIP incentive values, bill savings potential, discuss operational requirements of systems outside of resiliency backup, and other relevant topics. The Plan will also provide educational content to increase awareness of the SGIP, eligible technologies, and helpful information about program eligibility. SoCalGas believes there are opportunities to co-promote storage and renewable gas resiliency technologies. Messaging to include:

- Definitions of equity and equity resiliency budget categories;
- Eligibility requirements;
- Definitions, benefits and limitations of equity and resiliency;
- Highlight resilient operational expectations for medically reliant customers; and
- Educate on SGIP incentive calculations, operational program requirements, and navigating the application process.

Budget

The statewide budget for an ME&O Plan allows SGIP PAs a budget that should not exceed the following totals for the 2020 through 2024 program years:⁸

⁷ CBOs would conduct marketing activities and distribute tailored collateral at outreach events for targeted cities and communities.

⁸ D.20-01-021 at OP 7.

ME&O Budgets for 2020 – 2024 by PA	
PG&E	\$2,136,694
SCE	\$2,919,681
CSE	\$1,100,000
SoCalGas	\$560,000

Timeline and Metrics

SoCalGas has identified available company resources and strategies to make best use of the ME&O budget. SoCalGas will coordinate cross-functionally to initiate the channels and methods identified in this plan. Additionally, SoCalGas will continue to identify the strategies and tools necessary to further develop and improve the Plan. This will include metrics to measure impacts of the Plan's implementation over the five-year duration of the approved budget. Should budget availability in any given budget category be exhausted prior to the expected five-year duration, ME&O efforts specific to that customer class may be paused until such time that funds within that budget are replenished. Due to the frequent programmatic changes in SGIP, it is important to keep the Plan flexible to adapt to any changing market needs. SoCalGas is aware of the timeliness of this communication and the critical need to provide this outreach and will implement all stages of the outlined Plan as expeditiously as possible.

Protests

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date of this Advice Letter, which is November 30, 2020. The address for mailing or delivering a protest to the Commission is given below.

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

A copy of the protest should also be sent via e-mail to the attention of the Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). Due to the COVID-19 pandemic and the shelter at home orders, SoCalGas 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 via e-mail to the address shown below on the same date it is mailed or e-mailed to the Commission.

Attn: Ray B. Ortiz
 Tariff Manager - GT14D6
 555 West Fifth Street
 Los Angeles, CA 90013-1011
 Facsimile No.: (213) 244-4957
 E-mail: ROrtiz@socalgas.com

Effective Date

SoCalGas believes that this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. Therefore, SoCalGas respectfully requests that this submittal become effective on December 10, 2020, which is 30 days from the date submitted.

Notice

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.20-05-012. Address change requests to the GO 96-B service list should be directed via e-mail to tariffs@socalgas.com or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at process_office@cpuc.ca.gov.

/s/ Ronald van der Leeden
Ronald van der Leeden
Director - Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

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:

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: