

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



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 6111G
As of April 24, 2023

Subject: Non-Energy Benefits (NEBs) Study and Stakeholder Process Progress Report Pursuant to Ordering Paragraph (OP) 87 Of Decision (D.) 21-06-015

Division Assigned: Energy

Date Filed: 03-23-2023

Date to Calendar: 03-29-2023

Authorizing Documents: D2106015

Disposition:	Accepted
Effective Date:	03-23-2023

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



Clay Faber – Director
Regulatory Affairs
8330 Century Park Ct
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CFaber@sdge.com

March 23, 2023

**Advice Letter 4184-E
(San Diego Gas & Electric Company ID U 902 E)**

**Advice Letter 4993-E
(Southern California Edison Company ID U 338 E)**

**Advice Letter 6893-E
(Pacific Gas and Electric Company ID U 39 E)**

**Advice Letter 6111-G
(Southern California Gas Company – U 904-G)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: San Diego Gas & Electric Company, Southern California Edison Company, Pacific Gas and Electric Company and Southern California Gas Company Non-Energy Benefits (NEBs) Study and Stakeholder Process Progress Report Pursuant to Ordering Paragraph (OP) 87 Of Decision (D.) 21-06-015

PURPOSE

Pursuant to Ordering Paragraph (OP) 87 of the California Public Utilities Commission (CPUC or Commission) Decision (D.) 21-06-015, Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) (collectively, the Joint IOUs) respectfully submit their joint Advice Letter (AL), upon completion of the Non Energy Benefits (NEBs) study and stakeholder process progress report. This AL informs the Commission of the next steps the Joint IOUs will be taking to begin the NEBs study, and how the recommendations from the Energy Savings Assistance (ESA) Working Group will be taken into consideration.

BACKGROUND

On December 28, 2022, the ESA Working Group's Cost Effectiveness Sub-Working Group (Subgroup)¹ submitted to the service list for proceeding Application (A.) 19-11-003 its progress

¹ D.21-06-015 directed the formation of a cost effectiveness sub-working group of the Energy Savings Assistance (ESA) Program Working Group.

report on Recommendations to Facilitate the Non-Energy Benefits Study Process.² Pursuant to Ordering Paragraph 87 of D.21-06-015, the Joint IOUs are required to provide a description of the next steps they will take to begin the NEBs study along with a description of how the recommendations from the Working Group's progress report will be taken into consideration.³

DISCUSSION

This section provides the Joint IOUs' response to the Subgroup's recommendations. The Joint IOUs were directed in D.21-06-015 to form an ESA CARE⁴ Study Working Group (Study Working Group) composed of representatives from the Joint IOUs, Energy Division (ED), and interested stakeholders to provide feedback on study work scopes, budgets, timelines, and deliverables. The Study Working Group was formed in 2021.⁵ The Joint IOUs shared the Subgroup's Progress Report with the Study Working Group and received their feedback on the recommended study topics and process. The following Joint IOUs' response is consistent with the Study Working Group's feedback.

Next Steps for Study Initiation

The Joint IOUs, with input from the Study Working Group, met during the first quarter of 2023 to start developing a work scope and timeline for the study. The work scope and timeline will include at a minimum the following components:

- Clear study objectives.
- Questions to be answered by the study.
- Suggested tasks and methodology.
- Description of required deliverables; and
- Timing for study milestones and deliverables.

In addition, the Joint IOUs, with input from the Study Working Group, have designated SCE as the lead utility that will conduct the solicitation and provide contracting and co-funding requirements for procuring a consulting firm to conduct the study. Additional tasks to be completed include:

- Identifying potential consulting firms to include in the solicitation.
- Posting a public notice of the solicitation with the appropriate service lists, industry groups, and other appropriate venues; and
- Identifying and collecting supporting materials to be provided with the solicitation.

During the second quarter of 2023, the Joint IOUs expect to release a Request for Proposals (RFP) for the study, review, and score proposals, select a bidder, and execute a contract for

² California Energy Efficiency Energy Contacts, *ESA Cost Effectiveness Sub Working Group Report* (December 2022), available at: <https://pda.energydataweb.com/api/view/2754/ESA%20CE%20SWG%20Progress%20Report%20on%20Task%20%20NEB%20Study%20Process.pdf>.

³ D.21-06-015 at 492 (OP 87).

⁴ California Alternate Rates for Energy.

⁵ D.21-06-015 at 410-412, 480-481 (OP 45)

services. It is anticipated that the study will commence by the third quarter of 2023. This timeline is based on experience with similar evaluations and assumes minimal unanticipated delays. In addition to input from the Study Working Group, the plan follows the recommended approach and timeline in the Subgroup's progress report.

Subgroup's Recommendations

The overall study plan follows the recommended approach and timeline in the Subgroup's progress report.⁶ The progress report included the following recommendations:

Study Work Scope and Use of Results

The Subgroup recommended the primary research topic for the upcoming study should be to estimate California specific values for existing Non-Energy Impacts (NEI) using an ESA customer survey with a primary focus on health, comfort, and safety. The Joint IOUs agree with this primary research topic and plan to include this in the upcoming study. In addition, the Center for Accessible Technology (CforAT) provided additional suggestions to include in the study scope during the stakeholder review period of the progress report. The Joint IOUs, with input from the Study Working Group, plan to review and consider these suggestions during the development of the detailed study work scope.

The Subgroup also recommended the study results be "incorporated into the latest version of the NEBs model and all subsequent ESACET⁷ calculations by the Utilities" as directed by the Commission.⁸ In addition, the Subgroup recommended updated ESACET results be provided at the next regular occurrence of cost effectiveness analysis after the study is finalized. According to the study timeline, this is expected to be for the Program Year (PY) 2025 ESA Annual Report. The Joint IOUs agree with these recommendations and plan to follow them.

Study Team and Stakeholder Involvement

The Subgroup provided the following recommendations for the study team and stakeholder involvement. The Joint IOUs plan to follow all of these recommendations.

- The study team will include representatives from the Joint IOUs. An Energy Division representative may also join the team at their option. In addition, Study Working Group members will be involved at key milestones.
- The Joint IOUs will engage stakeholders for feedback at key points as follows:
 - Notice the low-income service list when the study will commence.
 - Notice and host a public webinar to present the draft detailed study work plan developed by the evaluator.
 - Notice and host a public webinar to present interim study results and collect feedback at the midpoint of the study.

⁶ ESA Cost Effectiveness Sub Working Group Report.

⁷ Energy Savings Assistance Cost Effectiveness Test.

⁸ D.21-06-015 at 517 (OP 172).

- Notice and host a public webinar to present the draft results; and
- Inform the Low-Income Oversight Board of study progress at their quarterly meetings.

Ongoing Process

The Subgroup provided a recommendation for a process to incorporate other new research into the NEBs model on an ongoing basis. The recommendation is directed toward the ESA Working Group and recommends they establish a Non-energy Impacts Research Review Committee to review and assess ongoing research related to ESA non-energy impacts. The Joint IOUs support this recommendation for the ESA Working Group.

Response to Subgroup Recommendations

The Joint IOUs agree with the recommendations noted above regarding (a) overall study scope and use of results; and (b) study team and stakeholder involvement. The Joint IOUs further support the recommendation that the larger ESA Working Group solidify the process to incorporate new research into the NEBs model.

EFFECTIVE DATE

Pursuant to OP 87 of D.21-06-015, this AL is submitted with a Tier 1 designation (effective upon approval). The Joint IOUs respectfully request an approval date of March 23, 2023, the date of submittal.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities 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 submitted electronically and must be received by April 12, 2023, which is 20 days from the date filed. There is no restriction on who may file a protest.

The protest should be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is delivered to the Commission.

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com
SDGETariffs@sdge.com

For SCE: Connor Flannigan
Managing Director, State Regulatory Operations
Southern California Edison Company
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NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list and Service List A.19-11-003, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by e-mail at SDGETariffs@sdge.com.

/s/ Clay Faber

CLAY FABER

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:

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

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AT&T

Regulatory

Barkovich & Yap, Inc.

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Biofuels Energy, LLC

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Braun & Blaising, P.C.

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EQ Research

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Green Charge

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Hanna and Morton LLP

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MRW & Associates LLC

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Pacific Gas & Electric Co.

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Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

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Service List

A.19-11-003