

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



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 6177G
As of October 24, 2023

Subject: Joint Submittal to Update Number of Eligible Pilot Participants and Modify Pilot Timeline and Evaluation Method for the Small Business Customer Outreach Pilot for Disadvantaged Communities

Division Assigned: Energy

Date Filed: 08-11-2023

Date to Calendar: 08-18-2023

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	09-10-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Michael Finnerty

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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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 11, 2023

Advice Letter 4783-G/7002-E

(Pacific Gas and Electric Company - U 39-M)

Advice Letter 5087-E

(Southern California Edison Company - U 338-E)

Advice Letter 4271-E/3220-G

(San Diego Gas & Electric Company ID U 902-E)

Advice Letter 6177-G

(Southern California Gas Company ID U 904-G)

Public Utilities Commission of the State of California

Subject: Joint Submittal to Update Number of Eligible Pilot Participants and Modify Pilot Timeline and Evaluation Method for the Small Business Customer Outreach Pilot for Disadvantaged Communities

Purpose

Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) (collectively, the “Utilities”) hereby submit this Tier 2 Advice Letter (AL) to modify specific implementation and evaluation parameters for the Small Business Customer Outreach Pilot targeted at Small Business Customers in Disadvantaged Communities (DAC) (Pilot). Specifically, this AL updates the (1) approximate number of customers eligible for participation, (2) evaluation methodology for the Pilot, and (3) proposed pilot schedule.

Background

On October 28, 2021, pursuant to Ordering Paragraph (OP) 9 of Decision (D.) 21-06-036, the Utilities jointly submitted Advice Letter 4620-E et al. seeking Commission approval of its proposal for a Small Business Customer Outreach Pilot for DACs, which provided the implementation parameters, cost recovery, and timeline for the Pilot.

On November 17, 2021, the California Community Choice Association (CalCCA) submitted a protest to Advice Letter 4620-E et al., claiming that the Advice Letter did not explicitly allow for participation of Small Business Customers that are served by CCAs in

the Pilot and requested that the Utilities be required to explicitly allow participation in the Pilot of CCA Small Business Customers in DACs.

On November 24, 2021, the Utilities responded to CalCCA's protest in which the Utilities refuted CalCCA's claims and referenced several sections of the Advice Letter that included proposals for CCA participation in the Pilot.¹

After further review and consideration, on September 9, 2022, the Utilities jointly filed Advice Letter 4620-E-A et al. to clarify that Small Business Customers served by CCAs are eligible to participate in this pilot. In this partial supplemental filing, the Utilities also proposed revising the timeline initially proposed to extend the amount of time required to complete the pre-Pilot activities from two months to three months as this additional time was needed to adequately prepare for the Pilot implementation.²

On October 18, 2022, Advice Letter 4620-E/E-A, et al., was approved with an effective date of December 1, 2021.³

Discussion

The Utilities seek to modify only the following information in the Utilities' proposal for the Small Business Customer Outreach Pilot targeted at Small Business Customers in DACs. All other information submitted in Advice Letter 4620-E/E-A et al. remains unchanged.

1. Updated Estimates of Small Business Customers Eligible for Pilot.

Table 1 in Advice Letter 4620-E, et al., provides estimates of Small Business Customers in DACs by each Utility that were automatically enrolled in the COVID-19 Small Business Relief Payment Plans as defined in, and required, by D.21-06-036⁴ as calculated in October 2021, or 28,800. Of those eligible to participate in the Pilot, the Utilities recommended a maximum of 9,550 be included in the outreach for the Pilot. Subsequent preparations for the launch of the Pilot, which began after Advice Letter 4620-E/E-A was approved in October 2022, demonstrated that revisions to these estimates have become necessary as the number of Small Business Customers that are enrolled in the COVID-19 Small Business Relief Payment Plans has decreased. Revised estimates by Utility are provided below. For SCE, due to the significant decrease in the total number of Small Business Customers in DACs that are enrolled in COVID-19 Small Business Relief

¹ See The Joint Utilities' Reply to Protest of CalCCA's Protest of Joint Submittal regarding Small Business Customer Outreach Pilot for Disadvantaged Communities, at 2.

² See https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS_4517-G-A.pdf, Table 5.

³ See https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS_4517-G-A.pdf, at 1.

⁴ D.21-06-036 Appendix C.

Payment Plans, SCE is also including in the outreach for the Pilot Small Business Customers in DACs that are enrolled in any payment plan. This change is appropriate as it provides customers in DACs the same opportunity to benefit from this pilot.

Table 1: Revised Total Customers Proposed for Small Business Customer Outreach Pilot

Utility	Approximate Number of Small Business Customers in DACs Automatically Enrolled in Payment Plans		Proposed Maximum Number of Small Business Customers for Outreach Pilot	
	As Reported in Advice Letter 4620-E et al.	Revised	As Reported in Advice Letter 4620-E et al.	Revised
PG&E	7,000	6,500	3,500	3,500
SCE	16,000 ⁵	750	4,000	750
SoCalGas	5,000	5,001	1,250	1,250
SDG&E	800	720	800	720
Total for Utilities	28,800	12,971	9,550	6,220

2. Change to Proposed Evaluation Methodology for the Pilot.

In Advice Letter 4620-E, et al., the Utilities proposed using a Randomized Control Trial (RCT)⁶ methodology to evaluate the success of the Pilot in helping customers located in DACs in lowering energy bills.⁷ The Utilities serve notice to the Commission that they plan

⁵ SCE was granted an extension by the CPUC until October 29, 2021 to automatically enroll residential and Small Business Customers in their respective payment plans, this represented the number of Small Business Customers that were eligible for automatic enrollment rather than the number enrolled.

⁶ An RCT is an experimental form of impact evaluation design whereby customers are assigned randomly to a treatment group (in this case participate in the pilot by being contacted by Energy Ambassadors), or to a control group. A key strength of an RCT design is that it provides a convincing case for causality: to aid in knowing that what has been achieved is the direct result of the pilot intervention.

⁷ RCT was not proposed for SDG&E due to its small number of eligible customers in DAC.

to change the evaluation methodology to use a quasi-experimental design (QED)⁸ to evaluate the Pilot. The use of the QED methodology will enable the Utilities to enroll all eligible Small Business Customers in DACs into the Pilot since the QED methodology does not require customers to be withheld from participation to serve as controls to assess the success of the Pilot, unlike the RCT methodology. This proposed change to the evaluation methodology is appropriate given the number of customers eligible to participate in the pilot. This change should not impact the quality of the evaluation outcome in a substantive manner and will allow the Pilot to serve the number of customers contemplated in the implementation plan approved in Advice Letter 4620-E, et al. For these reasons, the Utilities request approval to proceed evaluating the Pilot based in QED methodology.

3. Revision to Pilot Timeline

In Advice Letter 4620-E-A et al., Partial Supplement to Joint Submittal regarding Small Business Customer Outreach Pilot for Disadvantaged Communities, submitted on September 9, 2022, the Utilities presented a revised timeline that extended the time to complete pre-pilot activities, from two months to three months from the approval date of the Advice Letter. Since that submittal, the Utilities have determined that more time is needed to adequately prepare for the Pilot launch. Specifically, the implementer required more time than anticipated to complete pre-launch Pilot setup activities, including the vetting, hiring and training of its subcontractors, and the development and testing of its data processing systems. Moreover, the IT security reviews that the Utilities are required to conduct could not commence until after the implementer's data processing systems were completed. Table 2 below provides the proposed revised timeline for the Pilot. The Utilities respectfully request approval of the proposed schedule below.

⁸ A QED is a form of impact evaluation design whereby customers in the control group are selected among customers who were eligible for the Pilot but chose not to participate. Selection is made using the propensity score matching process that accounts for energy consumption, industry, customer arrearage (such as account balance and length), and participation in other utility programs. If there are not sufficient non-participants who are similar to participants within the pilot-eligible, non-participant population, customers who would have been eligible for the pilot except for their location outside a DAC will be included). The matched non-participant control group will go through a series of validation or attribute comparison steps to ensure the quality of the matching process.

Table 2: Second Revision to Timeline Proposed in Table 5, AL 4620-E-A et al. for Small Business Customer Outreach Pilot

Approved Dates	Revised Dates	Activity
October 28, 2021	N/A	Tier 2 Advice Letter is Filed
October 18, 2022	N/A	AL is approved
October 18, 2022 - January 18, 2023 ⁹	January 18, 2023 – May 31, 2023	Utilities complete pre-pilot activities to: <ol style="list-style-type: none"> 1. Hire third-party implementer (Completed in January 2023) 2. Engage third-party evaluator (Completed in January 2023) 3. Create customer outreach materials (Completed in March 2023) 4. Analyze customer energy usage to identify beneficial rates (Completed in May 2023)
January 19, 2023 – January 19, 2024 ¹⁰	June 1, 2023 – May 31, 2024	Pilot Implementation
January 20, 2024 – January 20, 2025 ¹¹	June 1, 2024 – May 31, 2025	Post Pilot Assessment
January 21, 2025 – October 21, 2025 ¹²	June 1, 2025 – March 1, 2026	Pilot Evaluation and Final Report

⁹ In AL 4620-E-A et al., the Utilities proposed completing pre-pilot activities within three months from the AL approval date.

¹⁰ In AL 4620-E-A et al., the Utilities proposed the pilot implementation to occur within 12 months after completion of pre-pilot activities.

¹¹ In AL 4620-E-A et al., the Utilities proposed the post pilot assessment to occur within 12 months after completion of pilot implementation.

¹² In AL 4620-E-A et al., the Utilities proposed the pilot evaluation and final report to occur within nine months after completion of the post pilot assessment.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **August 31, 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 the IOUs via E-mail at the addresses shown below on the same date it is electronically delivered to the Commission:

For PG&E:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

For SCE:

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
E-mail: Karyn.Gansecki@sce.com

For SoCalGas:

Gary Lenart
Tariff Manager
Southern California Gas Company
E-mail: Glenart@socalgas.com
E-mail: Tariffs@socalgas.com

SDG&E:

Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com
Email: SDGETariffs@sdge.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, this Advice Letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 Advice Letter become effective on regular notice, **September 10, 2023**, which is 30 calendar days from 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 GO 96-B service list and the service list for R.21-02-014. 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](mailto:ProcessOffice@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/>.

FOR PG&E:

_____/S/
Sidney Bob Dietz II
Director, Regulatory Relations

FOR SCE:

_____/S/
Connor Flanagan
Managing Director, State Regulatory Operations

FOR SoCalGas:

_____/S/
Gary Lenart
Tariff Manager

FOR SDG&E:

_____/S/
Greg Anderson
Regulatory Tariff Manager

cc: R.21-02-014 – Order Instituting Rulemaking to Address Energy Utility Customer
Bill Debt Accumulated During the COVID-19 Pandemic



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 (U 39 M)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Michael Finnerty
 Phone #: 279-789-6210
 E-mail: PGETariffs@pge.com
 E-mail Disposition Notice to: michael.finnerty@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) #: 4783-G/7002-E et al.

Tier Designation: 2

Subject of AL: Joint Submittal to Update Number of Eligible Pilot Participants and Modify Pilot Timeline and Evaluation Method for the Small Business Customer Outreach Pilot for Disadvantaged Communities

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 #:

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: N/A

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: 9/10/23

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: (415)973-2093
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 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