



June 28, 2024

Advice 7306-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Pacific Gas and Electric Company's Updated EPIC 4 Investment Plan
– Response to CPUC Disposition of Advice Letter 7145-E**

Purpose

Pursuant to Ordering Paragraph 6 of Decision (D.) 23-11-086 of the California Public Utilities Commission (Commission) and Article 2 of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) hereby files this Tier 2 Advice Letter "2021- 2025 Updated Electric Program Investment Charge (EPIC) 4 Investment Plan – Response to CPUC Disposition of Advice Letter 7145-E."

Background

On October 3, 2022, PG&E filed Application (A.) 22-10-003 requesting approval of our Proposed EPIC 2021- 2025 Investment Plan. On December 4, 2023, the Commission issued D.23-11-086 approving PG&E's EPIC Plan with modifications. On January 16, 2024, PG&E filed Advice Letter 7145-E pursuant to Ordering Paragraph 6 of D.23-11-086, updating our EPIC Plan.

On June 3, 2024, the Commission issued Disposition of Advice Letter 7145-E approving PG&E's Advice Letter 7145-E as of May 21, 2024, with one additional modification. Specifically, the June 3 Disposition Letter states:

PG&E's advice letter demonstrated compliance with the Commission's order in all identified areas except one. Specifically, based on the criterion of D.23-11-086, Energy Division does not approve PG&E's modification on how it will demonstrate improved disadvantaged vulnerable California community (DVC) and community-based organization (CBO) participation in its EPIC workshops. Energy Division's analysis has determined that PG&E has not provided supporting metrics or methodologies for demonstrating improved DVC/CBO participation in its EPIC workshops.¹

¹ CPUC Disposition of Advice Letter 7145-E, June 3, 2024, p. 41.

The Disposition Letter continues:

While PG&E provides additional information on its C-PAC [Community Perspectives Advisory Council], it fails to explain how it will demonstrate improved DVC [disadvantaged community] and CBO [community-based organization] participation in its workshops ... PG&E must explain how to measure an increase in the number and diversity of DVC and CBO participation in its workshops.²

EPIC 4 INVESTMENT PLAN AMENDMENT

Accordingly, PG&E's "Updated 2021- 2025 Electric Program Investment Charge (EPIC) Investment Plan – Response to CPUC Disposition of Advice Letter 7145-E" includes a new Appendix G "Demonstrating Improvement of Disadvantaged Vulnerable California Communities / Community-Based Organization Participation in EPIC Workshops." In this letter, we are only submitting the new Appendix G. The complete updated EPIC 4 Investment Plan, with the new appendix, will be uploaded to the www.pge.com/epic public webpage.

Through this Appendix G:

1. PG&E seeks to continue to improve our engagement with DVCs and CBOs.
2. PG&E updates its Workshop Registration Process to establish a baseline, and measure improvement in, DVC and CBO engagement. This data will help PG&E determine its current audience at EPIC Workshops and changes in audience composition over time.
3. PG&E will undertake corrective action if PG&E data collection and analysis finds instances of low engagement with certain communities, geographies or sectors.

PG&E appreciates the opportunity to provide this new Appendix G to the EPIC 4 Investment Plan.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **July 18, 2024**, 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

² CPUC Disposition of Advice Letter 7145-E, June 3, 2024, p. 4.

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 11 of D.23-11-086, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, **July 28, 2024**, 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.22-10-001 and R.19-10-005. 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

Appendix G - Demonstrating Improvement of Disadvantaged Vulnerable California Communities / Community-Based Organization Participation in EPIC Workshops

cc: Service Lists A.22-10-001 et. al., R.19-10-005



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 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Michael Finnerty
 Phone #: (279) 789-6216
 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) #: 7306-E

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company's Updated EPIC 4 Investment Plan – Response to CPUC Disposition of Advice Letter 7145-E

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.23-11-086

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: 7/28/24

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

APPENDIX G: Demonstrating Improvement of Disadvantaged Vulnerable California Communities/Community-Based Organization Participation in EPIC Workshops

At PG&E, we share the CPUC's commitment to environmental and social justice.

Environmental and social justice means making better business decisions by understanding the impacts of our activities and investments on environmental and social justice communities, while providing more sustainable, inclusive, and equitable customer solutions.¹ Environmental and social justice communities consist of disadvantaged communities, low-income communities, and historically marginalized racial and ethnic communities who have been disproportionately impacted by environmental hazards.

PG&E's Updated EPIC 4 2021-2025 Investment Plan demonstrates PG&E's commitment to environmental and social justice, as well as its alignment in advancing the goals of the CPUC Environmental and Social Justice Action Plan, the Commission's DER Action Plan, and the federal Justice40 Initiative in Appendix D-F.

PG&E seeks to continue to improve our engagement with DVCs and CBOs. Our R&D Operations team regularly partners with PG&E's Community Perspectives Advisory Council (C-PAC). For example, the R&D Operations connected directly with the C-PAC members ahead of PG&E's EPIC 4 Public Workshop and launch of the EPIC 4 Portfolio. Through this engagement, we sought to facilitate two-way learning about EPIC and the perspectives of C-PAC members by:

1. Introducing the EPIC Program and provide space for discussion and questions
2. Explaining PG&E's TD&D projects and soliciting feedback
3. Learning from members' experiences with certain problems these TD&D projects are trying to address
4. Offering further engagement with members about specific projects, where interest, experience, or geography align

¹ PG&E Environmental and Social Justice Policy, 2023, [PG&E Environmental and Social Justice Policy \(pgecorp.com\)](https://www.pgecorp.com)

5. Providing preview of the public workshop and explanation of how to engage in the regulatory process or directly with our team

As PG&E implements the EPIC 4 Investment plan, we shall measure improvement in DVC and CBO engagement in EPIC Workshops in an effort to improve project-specific engagement.

For EPIC Workshops, PG&E will continue to work with C-PAC, Supplier Diversity team, and Income Qualified Programs team, and Community Relations to facilitate outreach and invitations, as these organizations regularly serve or work with DVCs and CBOs in PG&E’s Service area. To establish a baseline and measure improvement in DVC and CBO engagement, we will include additional fields in the Workshop Registration Process. Fields will request the following data:

Data Field	Rationale
Zip Code	To determine if an organization is located in a DVC or low-income census track
Organization Name	To determine if PG&E has an existing relationship with this organization or if there is an opportunity for new engagement
Organization Type (Utility, Government, CBO, etc.)	To determine the breakdown by organization type and to identify where outreach to additional types of organizations is needed
Description of the membership or community an organization serves	To determine what communities the organization represents and/or serves

Together, this data collection will help PG&E determine its current audience at EPIC Workshops and changes in audience composition over time. Additionally, PG&E intends to use this data to identify potential EPIC 4 project-specific engagement opportunities, which could inform a project’s scope, implementation, location, design of its feedback process, or other elements.

Through this data collection and analysis, PG&E may find instances of low engagement with certain communities, geographies, or sectors. If so, PG&E’s EPIC Program will collaborate with its Supplier Diversity, Income Qualified Programs, and Community Relations teams, as well as its Regional Service Model Program Management Office to develop engagement opportunities that are valuable and culturally relevant to the communities we are seeking to reach. At this point, it is premature to prescribe a specific response or corrective action. Rather, we will use the following principles to guide our response:

- Advance the DACAG equity principles through the implementation of the EPIC Portfolio;
- Understand customers values, concerns, and priorities;
- Respect if and how DVCs or CBOs would like to be engaged, or not;
- Compensate individuals or organizations fairly;

- Avoid duplicative engagement across PG&E or other proceedings; and
- Leverage existing customer and community insights and avoid over-burdening communities with engagement efforts.

* * * * *

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	East Bay Community Energy	Pacific Gas and Electric Company
Albion Power Company	Ellison Schneider & Harris LLP	Peninsula Clean Energy
Alta Power Group, LLC	Electrical Power Systems, Inc. Fresno	Pioneer Community Energy
Anderson & Poole	Engineers and Scientists of California	Public Advocates Office
Atlas ReFuel BART		Redwood Coast Energy Authority
	GenOn Energy, Inc.	Regulatory & Cogeneration Service, Inc.
BART	Green Power Institute	Resource Innovations
Buchalter		Rockpoint Gas Storage
Barkovich & Yap, Inc.	Hanna & Morton LLP	SCD Energy Solutions
Braun Blaising Smith Wynne, P.C.		San Diego Gas & Electric Company
	ICF consulting	SPURR
California Community Choice Association	iCommLaw	San Francisco Water Power and Sewer
California Cotton Ginners & Growers Association	International Power Technology	Sempra Utilities
California Energy Commission	Intertie	Sierra Telephone Company, Inc.
California Hub for Energy Efficiency	Intestate Gas Services, Inc.	Southern California Edison Company
California Alternative Energy and Advanced Transportation Financing Authority		Southern California Gas Company
California Public Utilities Commission	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Cameron-Daniel, P.C.	Keyes & Fox LLP	Sunshine Design
Casner, Steve		Stoel Rives LLP
Center for Biological Diversity	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Chevron Pipeline and Power City of Palo Alto	Los Angeles County Integrated	TerraVerde Renewable Partners
City of San Jose	Waste Management Task Force	Tiger Natural Gas, Inc.
Clean Power Research		TransCanada
Coast Economic Consulting	MRW & Associates	Utility Cost Management
Commercial Energy	Manatt Phelps Phillips	Utility Power Solutions
Crossborder Energy	Marin Energy Authority	
Crown Road Energy, LLC	McClintock IP	
Communities Association (WMA)	McKenzie & Associates	Water and Energy Consulting
	Modesto Irrigation District	Wellhead Electric Company
Davis Wright Tremaine LLP		Western Manufactured Housing Communities Association (WMA)
	NOSSAMAN LLP	
Day Carter Murphy	NRG Solar	Yep Energy
Dept of General Services		
Douglass & Liddell		
Downey Brand LLP	OnGrid Solar	
Dish Wireless L.L.C.		