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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Identify Disadvantaged Communities in the San Joaquin Valley and Analyze Economically Feasible Options to Increase Access to Affordable Energy in those Disadvantaged Communities.	Rulemaking 15-03-010

ASSIGNED COMMISSIONER'S RULING PROPOSING PHASE II PILOT PROJECTS IN TWELVE COMMUNITIES IN THE SAN JOAQUIN VALLEY AND NOTICING ALL-PARTY MEETING

Summary

This Assigned Commissioner's Ruling (ACR) sets out a straw proposal for Pilot Projects in twelve (12) of the disadvantaged communities identified in Phase I of this proceeding consistent with Assembly Bill (AB) 2672, codified as Public Utilities (Pub. Util.) Code Section 788.5. The communities are Allensworth, Alpaugh, Cantua Creek, Ducor, Fairmead, Lanare, Le Grand, La Vina, Monterey Park Tract (MPT), Seville, California City, and West Goshen. Parties are invited to comment on any or all aspects of this proposal, including several specific questions included in this ACR. Comments are due on October 12, 2018; reply comments are due on October 22, 2018.

Program funds addressed in other proceedings will be targeted to cover some costs for the proposal set forth herein. In order to accomplish this there may need to be changes or adjustments to current rules for some of these programs. Therefore, I am directing the California Public Utilities Commission Docket Office to serve this ACR on the service list for the following proceedings:

Rulemaking (R.) 12-11-005, R.12-06-013, Application (A.) 14-11-007, and R.14-07-002.

This ACR also notices an all-party meeting on November **1, 2018 from 4:45p.m. to 6:00 p.m. in Fresno, California** and a public participation hearing on the same date, **November 1, 2018 at 6:15 p.m.** to be held at:

San Joaquin Valley Air Pollution Control District Central Office
Governing Board Room
1990 E. Gettysburg Avenue, Fresno, CA 93726

With remote access at:

San Joaquin Valley Air Pollution Control District Northern Office
4800 Enterprise Way, Modesto, CA 95356

San Joaquin Valley Air Pollution Control District Southern Office
34946 Flyover Court, Bakersfield, CA 93308

This ACR additionally notices a public participation hearing on **November 7, 2018 at 6:00 p.m. in Tulare, California** to be held at:

Tulare Council Chambers
475 North M Street, Tulare, CA 93274

1. Background

This proceeding implements Assembly Bill (AB) 2672, codified as Public Utilities (Pub. Util.) Code Section 783.5.[1] Legislative analysis of the bill found that, where natural gas is unavailable, wood stove, propane or electricity is used for space and water heating. The analysis also found that "for low income households, the use of natural gas or electricity can decrease utility costs, increase overall financial health, and provide a safer means of heating and cooling space and water."

[1] All statutory code sections refer to the Pub. Util. Code unless otherwise stated.

On March 26, 2015, the California Public Utilities Commission (Commission) issued this Order Instituting Rulemaking (OIR) to meet the requirements of and implement Section 783.5. The Commission first needed to identify disadvantaged communities in the San Joaquin Valley meeting specific income, geographic, and population requirements. The Legislature directed the Commission to then analyze the economic feasibility of certain energy options for the identified communities. The three categories of energy options specified by statute are:

(a) extending natural gas pipelines,

(b) increasing existing program subsidies to residential customers; and

(c) other alternatives that would increase access to affordable energy.

The Commission adopted the Phase I Decision (D.)17-05-014 in this proceeding on May 11, 2017. The Phase I decision adopted the methodology for identification of communities meeting the statutory definition of a San Joaquin disadvantaged community under Section 783.5. D.17-05-014 approved a list of 170 San Joaquin Valley disadvantaged communities (SJV DAC list). [2]

On June 9, 2017 during a prehearing conference (PHC) the Public Advocates Office (Cal PA)[3] offered to provide a framework for moving forward

[2] On June 14, 2017, the Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), and Southern California Gas Company (SoCal Gas), (collectively the IOUs) and the Leadership Counsel for Justice and Accountability (Leadership Counsel) filed an "Accountability Report on Additional San Joaquin Valley Counties' Disadvantaged Communities to Consider per D.17-05-014." (Accountability Report) that provided information on sixteen communities potentially eligible for inclusion on the SJV DAC list.

[3] The Office of Ratepayer Advocates (ORA) was renamed the Public Advocates Office of the Public Utilities Commission (Cal PA) pursuant to Senate Bill No. 854, which the Governor

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with the data collection track of the proceeding, and Self-Help Enterprises, Center for Race Poverty and the Environment, and Leadership Council for Justice (the Pilot Team) offered to provide a framework for moving forward with potential pilot projects.[4] Cal PA provided a proposed framework for data collection and the Pilot Team provided a proposed framework for moving forward with the pilot projects. All parties were directed to provide comments on both proposed frameworks.

A second PHC was held on September 6, 2017 in Fresno, California. During the second PHC the parties discussed the Pilot Team's basis for recommending SJV DACs included in the proposed pilot project framework. All parties agreed that for a community to be included for consideration as a potential host, the community would need to trust the process; there would need to be "community buy-in." No party objected to moving forward with assessing the eleven (11) communities identified by the Pilot Team as hosts for pilot projects. An additional community proposed by SoCal Gas, California City, was added to the list of potential host communities. No other party proposed potential pilot project host communities for consideration.

The Phase II Scoping Memo divided this phase of the proceeding into two tracks; A and B.[5] Track A addresses authorization and implementation of

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approved on June 27, 2018. Documents in this proceeding were filed by Cal PA as recently as September 10, 2018 with ORA as the party name and therefore the filings in the record reflect ORA as the party that is now named Cal PA. This decision therefore uses both ORA and Cal PA to reflect the same entity as appropriate.

[4] No party objected to the frameworks being prepared by Cal PA and the Pilot Team.

[5] Track B of Phase II addressed data gathering needs for evaluation of economically feasible potential energy options for all identified communities. The decision for Phase II Track B- Data Gathering, D.18-08-019 was issued on August 31, 2018. D.18-08-019 also addressed sixteen

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pilot projects that are intended to provide cleaner and more affordable energy options to propane and wood burning for a select number of SJV DACs. Parties provided comments on a broad range of issues which has led to extensive documentation on the parties' positions concerning process and substance for moving forward with implementation of the pilot projects. Numerous parties, including Greenlining Institute, Cal PA, the Center for Accessible Technology (CforAT) and The Utility Reform Network (TURN), Grid Alternatives (GRID), the Sierra Club, the City of Fresno, the Pilot Team, Pacific Gas & Electric (PG&E), Southern California Gas Company (SoCal Gas), Southern California Edison (SCE) (collectively the Investor Owned Utilities (Utilities or IOUs) filed comments and reply comments on an extensive list of questions, preliminary scope, categorization, and need for hearings. The IOUs and GRID also submitted detailed pilot project proposals which parties commented on extensively. This created a broad record to draw from in developing the straw proposal presented in this ACR.

2. Pilot Project Objectives and Guiding Principles

Section 783.5(b)(2)(A) directs the Commission to analyze the option of extending natural gas lines, or other alternatives that will provide affordable energy to disadvantaged communities in the San Joaquin Valley. The Commission, pursuant to Section 783.5(b)(2)(B), is directed to consider

identified communities not included on the SJV DAC list. These communities were identified in the June 14, 2017 Accountability Report as probably meeting the statutory criteria of Section 783.5. *See* Comments of Leadership Counsel for Justice and Accountability on Questions in Attachment 3 to Scoping Memorandum, February 2, 2017, Exhibit A. Nine of the 16 communities were formally added to the SJV DAC list by adoption of D.18-08-019. These nine communities are: Alkali Flats, Earlimart Trico Acres, Five Points, Harwick, Hypericum (Dog Town), Madonna, Monterey Park Tract (MPT), Perry Colony (the Grove), and Ripperdan. See OP 8, D.18-08-019.

"increasing subsidies" for electricity for residential customers in the communities on the SJV DAC list. Section 783.5(b)(2)(C) also directs the Commission to consider "other alternatives" that would increase access to affordable energy in SJV DAC listed communities. Consistent with the scoping memo issued in this phase of the proceeding, we are considering pilot projects that will assist with assessing the economic feasibility of programs and tariffs that may be utilized to satisfy the requirements of Assembly Bill (AB) 2672 in Phase III of the proceeding.

Programs that may provide support for meeting the goals of AB 2672 include the:

- Energy Savings Assistance Program (ESA);
- California Solar Initiative Solar Thermal program (CSI-Thermal);
- Multifamily Affordable Solar Housing (MASH);
- Single Family Affordable Solar Housing (SASH);
- Self-Generation Incentive Program (SGIP);
- Solar on Multifamily Affordable Housing (SOMAH) program;
- Net Metering (NEM); and
- Low-income and DAC solar programs (DAC-GT, DAC-SASH, and Green Tariff Community Solar (DAC-CS).

Our examination of "effectiveness" of utilizing existing programs for AB 2672 includes measuring the penetration rate of each program in the host community for the pilot project by quantifying the number of program participants among all eligible customers, as well as where there may be additional overlap for utilization for these programs to fund identified projects in host communities that meet the goals of AB 2672.

The IOUs submitted proposed pilot projects for the twelve (12) identified host communities that include the type of project proposed, estimated cost, and whether program funding from other Commission programs can be utilized to implement the proposed pilot project. At least one all-electric pilot proposal was submitted for all communities, except for MPT. An all-electric proposal was submitted by either the relevant utility or GRID for each of the other eleven (11) communities.

This ACR sets out a proposal for adoption, planning, implementation, and evaluation of twelve (12) pilot projects in SJV DAC host communities. The proposal is guided by the intent and requirements of AB 2672 to find clean affordable energy options to propane and wood burning for disadvantaged communities in the San Joaquin Valley and builds upon the work produced in Phase I of the proceeding. The proposed pilot projects vary in complexity and cost with a goal of providing cleaner, more affordable energy options to the identified communities. It is the intent that the pilot projects will allow for acquiring real time information/data on how best to meet the needs of all the communities on the SJV DAC list. This information will assist in future implementation of SJV DAC projects.

The proposal presented here is not to be deemed precedential and is directed solely at the 12 identified pilot communities. In consideration of the purposes and background described above, the Pilot Project objectives are as follows:

- Gather inputs to assess cost-effectiveness and feasibility during Phase III;
- Provide equitable access to affordable energy options in participating pilot project host communities;

- Reduce household energy burden for participating pilot project host customers;
- Increase health, safety and air quality of participating host pilot project communities;
- Test approaches to efficiently implement programs;
- Assess potential scalability.

In addition, each approved pilot project will test specific questions related to the pilot design.

With the project objectives set forth above in mind, and the extensive information gathered through this phase of the proceeding the following principles have guided the development of this proposal:

- Legislative directive of AB 2672;
- Community-Based Approach – community support for projects;
- Measured Transition to cleaner energy sources considering need to meet community energy needs and potential for electrical outages;
- Customer Choice;
- Comparable Service;
- Pilot Project Tool for Data Gathering;
- Leverage Efficiencies While Maximizing Third Party Implementation.

The following are the Pilot Project Selection Criteria that determined which IOU and GRID proposed pilots were eligible for selection and possible approval. Since many pilots met the following criteria, I ultimately selected proposed pilots based on the Guiding Principles outlined above.

Community Support and Benefits

Each selected pilot project is supported by the host community, includes plans for continuous community engagement (including with hard-to-reach households), and includes a feedback loop to incorporate lessons-learned and qualitative feedback as pilots develop. The proposed pilot project advances community benefits including improvements to health, safety, reliability and air quality, and includes local hire goals and/or a workforce development plan.

Affordability and Reasonableness of Costs

Each of the proposed pilot projects set forth below include bill protection measures for customers in the host communities during and after the pilot implementation. This Assigned Commissioner's Ruling (ACR) proposal also provides for cost savings and affordability for participants;

Pilot Replicability and Value

The questions or assumptions the pilot projects will test are clear, incremental to what is already known and, across pilots, diversified. The pilot projects are scaled appropriately to achieve the objectives set forth above. Each pilot will produce useful data in an appropriate timeframe (*i.e.* pilot can be completed within 1.5-2 years and the pilot and evaluation study can be completed within 3 years). For the pilot projects with longer timeframes, this proposal includes discussion of how a longer time frame will not delay consideration of pilot results and extension of promising approaches to other communities on the SJV DAC list. The proposal provides for assessment of other Commission programs and non-ratepayer funding sources that may be available to support pilot project implementation which could be replicated for future projects in other communities on the SJV DAC list.

Additional Considerations

I also take into consideration how each proposed pilot project may contribute to economic development in the host community and minimizes inconvenience to participating households.

Pilot Project as Data Gathering and Learning Tools Not an Ongoing Program

My proposal reinforces the objective of utilization of the pilot projects as gathering data and learning tools prior to assessing economic feasibility and the potential for extending offerings to other SJV DACs that will be addressed in Phase III of this proceeding. As such, I emphasize the need to approve pilots in all 12 communities. These 12 communities represent less than 1% (7,480) of the overall population of the 179 communities (892,574), and not quite 10% (2,780) of the households without gas in the 179 communities (29,591). Although not all 2,780 households will be 'treated', there is a sufficiently large sample size in the pilots[6] to learn from the various investment strategies that maybe authorized in these communities. The per home average funding levels (up to $27,663) for the pilot projects are not precedential and will not necessarily be approved for the full SJV DAC list.

3. Pilot Project Communities

The twelve proposed pilot project communities are some of the poorest communities in California. As indicated in Table 1, the average household annual income across the communities is $31,214 per year, spanning a low of $20,700 per year in West Goshen and $41,776 per year in Le Grand. Together the

[6] This proposal includes an Advanced Package for 1,842 households as discussed in more detail below.

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communities comprise approximately 7,480 households, with about 2,758, or 36% of these lacking access to natural gas. Approximately eighty-five percent of households across the communities qualify for the California Alternative Rates for Energy program (CARE).[7]

Table 1: Summary of Pilot Project Communities

Community	Average Annual Income	Percent CARE Eligible[8]	Total Households	Unserved Households
Allensworth	$29,091	88%	116	116
Alpaugh	$38,750	86%	225	46
California City	$48,776	90%	5,254	1110
Cantua Creek	$32,368	74%	119	106
Ducor	$29,313	84% GRID 96% SCE	163	163
Fairmead	$31,773	85%	401	253
Lanare	$26,023	85%	150	15
Le Grand	$41,776	86%	502	502
La Vina	$23,000	85%	165	84
Monterey Park Tract (MPT)	$30,000	Est. 25%+[9]	53	53
Seville	$23,000	85%	122	100
West Goshen	$20,700	84% GRID 100% SCE	210	210
Totals			**7480**	**2758**

Renters currently occupy about 37% of homes across the communities. In addition, most (70%) of the dwellings lacking access to natural gas are single-family homes. About 100 mobile homes and 100 multi-family units also lack access to natural gas.

[7] Unless otherwise stated, we derive pilot project summary information from the three IOUs' and GRID's Updated Pilot Projects, filed September 10, 2018.

[8] Unless otherwise indicated, the source for these current estimates of percent CARE-eligible households is GRID Alternatives and Partners, "Revised Proposal as Directed by the ALJ's August 3, 2018 Ruling," September 10, 2018 at A6 8 – A6 11, which indicates PG&E as the source of GRID's data. PG&E did not provide estimates of CARE eligible households in its September 10, 2018 Updated Pilot Proposal, as requested in the August 8, 2018 ALJ Ruling.

[9] D.18-08-019.

Table 2: Housing Types in Pilot Communities[10]

	Owner-occupied	Renter-occupied	Vacant/uninhabitable
Allensworth	56	59	27
Alpaugh	120	106	17
Cantua Creek	48	65	15
Fairmead	205	155	44
Lanare	87	53	7
Le Grand	315	143	45
La Vina	39	24	4
Seville	55	53	7
Total	925	658	166
Percent	52%	37%	9%

4. Summary of Updated IOU and GRID Pilot Project Proposals

GRID and the IOUs provided Updated Pilot Project filings on September 10, 2018. These proposals included many improvements and new ideas, some of which I reflect in my proposal. Table 3 summarizes the September 10, 2018 Updated Pilot Project proposals at a high level.

Table 3: Summary of GRID and IOU Updated Pilot Project Proposals

	GRID	PG&E Electric	SCE	PG&E MPT	SoCalGas
Average cost/hh (excluding leveraged budgets)[11]	$29,855	$14,460	$35,792	$76,546	$47,983.51
Total new budget requested	$69,054,359	$25,710,000	$28,993,120	$6,381,485	$38,338,824
Total Communities served	10	8	3	1	7
Total hh treated	2313	1222	860	53	799

[10] Not all pilot communities are listed, this information was taken from PG&E's September 10, 2018 updated pilot proposal.

[11] Leveraged budgets include existing programs such as the ESA Program, the MIDI Program, for PG&E, the DAC-GT and DAC-CS and others.

Although the estimated average cost per household for PG&E appears significantly lower than that of the others, this is in part due to the inclusion of households receiving education only in some communities. Proposed treatment numbers for electric pilot projects also in some cases include households proposed to receive only ESA or MIDI measures only.

4.1. PG&E Renewable BioGas Microsystem

PG&E proposes developing a localized gas distribution network for the community of MPT that is served by PG&E's portable gas service and/or locally sourced biomethane or renewable natural gas (RNG). PG&E's proposal takes into account MPT's unique situation as a community in electric service territory of the Turlock Irrigation District (TID), a municipal utility district that does not fall under the jurisdiction of the Commission. Originally, PG&E evaluated the cost of extending the nearest natural gas mainlines at a distance of roughly 1.5 miles from MPT and determined that it would be cost prohibitive with total project cost of $6.7 million to serve the 53 households that currently lack natural gas.

On September 10, 2018, PG&E submitted a updated proposal for MPT that leverages the community's proximity to multiple large confined animal facilities. PG&E's biogas microgrid proposal entails a single pilot treatment for all MPT households at an estimated total cost of $4.1 million for all in-front-of-meter (IFM), behind-the-meter (BTM) and administrative costs. PG&E estimates annual bill savings to customers of $1,350.00 per household (77 percent less than estimates of propane bills) and expects negligible impacts on non-participating PG&E customers' bills.

PG&E's proposed MPT Phase 1 consists of building the distribution network and a gas hub and converting eligible homes from propane appliances

to new, high-efficiency natural gas appliances including all necessary home improvements to accomplish the conversion. PG&E would also acquire sufficient land from a nearby dairy during Phase I and design, engineer and size facilities in the hub for the subsequent build out of Phase II utility facilities. PG&E proposes that MPT be supplied with RNG procured by PG&E until Phase 2 is completed. Phase 1 is proposed to take 12-18 months.

In Phase 2, PG&E proposes developing a local source of biomethane from a local dairy by building out the necessary infrastructure within the gas hub and fueling station to utilize excess RNG for vehicles. PG&E proposes that a biomethane digester and related clean up, conditioning and injection facilities be developed as a turn-key project led by the dairy owner and/or a qualified biomethane developer. Costs are assumed to be borne by the dairy biomethane project developer and/or via allowances, subsidies, research and development grants and ratepayer funds allocated in other relevant proceedings or gas utility programs. PG&E would construct, own and operate the interconnection for any excess biomethane not consumed on-site or by local compressed natural gas vehicles. Phase 2 would take 2-3 years to complete depending on permitting and financing. The costs related to Phase 2 are not included in PG&E's proposed budget for the pilot phase of this proceeding.

PG&E proposes a discount or incentive to defray the cost premium for biomethane over natural gas. Several options exist for designing this incentive, including but not limited to: (1) a mechanism similar to those used in the solar program; (2) enabling biomethane to realize the same or similar credits when locally sourced and used to serve DACs; and (3) "cost-sharing," by which PG&E means that in order to make the rate for biomethane more affordable for DAC customers, the above market cost (or premium) for biomethane would be shared

across all customer classes. These incentives do not exist for RNG, today. The gas microgrid pilot represents the opportunity for PG&E to explore these new financing options in a test and learn setting.

PG&E has incorporated an energy burden protection component for eligible participants in the MPT RNG pilot. This is a bill protection transitional incentive through the pilot process. Under PG&E's proposed Energy Burden Protection transitional incentive, CARE-eligible customers would not pay more than they would have under their current propane service agreements. I believe this project has potential to contribute to cleaner energy options for MPR, however additional information is required to fully consider whether to authorize this proposal. My additional questions and proposed changes are discussed further below.

5. Updated Electric Pilot Project Proposals

The Updated Electric Proposals filed by SCE, PG&E and GRID contain both similar and dissimilar approaches. My proposal does not include a detailed narrative of these proposals but rather summarizes them at a high level below.

Table 4: Summary of Updated Electric Pilot Project Proposals

Issue	GRID	PG&E	SCE
Communities	All but CA City and MPT	All 8 in service territory	All 3 in Service territory
Solar	-Yes, would actively facilitate DAC- CS in all communities. -Bill discounts to post-retrofit bills -40% to low-income fuel switchers; 20% all others	Yes, would promote DAC-GT and DAC-CS	Yes, would promote DAC-GT and DAC-CS
In-home storage	-Offered as an optional item -Cost covered to extent of designated subsidy	No	See water heater below

Issue	GRID	PG&E	SCE
On-Bill Financing	Yes	No	No
Bill Protection	Yes, via a DAC-CS post-retrofit discount of 40% for low income-income fuels switchers	-Test "Energy Bill Protection" in La Vina and Seville -up to $500 annually with proof of previous costs	-No. "Can't guarantee bill savings." -Energy education
Grid integrated electric water heater	No, or not detailed	-Yes, probably in Alpaugh, using AB2868 funds	-Yes, in 12 homes in three communities
Co-Pays	-None, but proposes four different levels of subsidy caps per hh	-Yes, for non-low-income only (except in La Vina) -Co-pays of 10-20% of costs of BTM measures only (i.e. subsidizes rewiring and panel upgrades if needed)	-None
Definition of low income	- CARE or FERA – but based on 5 yr average income	-ESA/CARE	-ESA/CARE
Weatherization	-as covered by ESA/MIDI program	-as covered by ESA/MIDI program	-ESA as basic package -Enhanced package of up to $500 in air sealing; eligibility not clear
Households included	-All community hh -But only those using wood or propane for one or more essential functions qualify for subsidy of new appliances	-All community hh -Only low-income receive appliance subsidies. -Those not eligible subsidy directed by Community Energy Navigator to existing programs (ESA)	-All hh lacking natural gas, except in CA City, where target is 500 hh, prioritizing low income -Not clear if add'l effort to direct non-participating hh to existing programs.
Appliances offered	-Offer Cooktop conversion; Heat Pump Space Heating and Cooling; Heat Pump Water Heater; Microwave	-Four types of approaches: Appliance Specific (AS), Total Electrification (TE) with and w/out co-	Replace up to four appliances (water heater, space heater/cooler, cooking, clothes dryer)

Issue	GRID	PG&E	SCE
	Installation; Clothes Dryer - Low-income subsidy up to average of $18,600/home BTM -Non-low-income home subsidized up to $10,500/home average -Can elect optional items up to subsidy cap- home energy storage, tankless water heater, solar hot water heating, water heating with energy storage, smart thermostat)	pay (La Vina), and Community Energy Navigator (CEN) only (Lanare) -AS selects from larger appliance list, but does not receive full electrification (cooking, hot water, heating only). -No-Cost TE is fully electrified, but reduced appliance selection -Co-Pay required for non-low-income (method not specified)	
Workforce Training / Local Hire	-Proposes classroom and hands-on training modules on solar and efficiency retrofits (and provides some details) -Opposes local hire requirements until Phase III	- Work with local WIBs and CRCs to raise awareness of opportunities. -Would engage community and encourage 3P implementer to hire local but would not require. -Offer existing K-12 education programs locally.	- Goal is to work with local CBOs and contractors -Will issue an RFP for a contractor with the appropriate track record, skills and licenses that also values hiring locally.
Tenant Benefits / Landlord Engagement	-Supports use of SOMAH affidavit. -Notes that solar credits may provide add'l leverage with landlords	-Plans to fully engage landlords but objects to any CPUC requirement for IOUs require IOUs to "oversee" a landlord-tenant relationship. If CPUC pursues any strict tenant-benefits requirements it shd have a NGO or 3P oversee work.	-CBOs will help facilitate -Will require landlord and tenant to mutual consent to agree in program. -Will seek to restrict rent increases related to pilot activities. -Will examine tenant impact during pilot

Issue	GRID	PG&E	SCE
Time to completion	21 months (excludes EM&V?)	4.5 years (includes EM&V)	3 years (includes EM&V)

6. Proposed Pilot Project Approach

My proposed pilot project approach has three main components- Basic Community Package, diversified Advanced Packages, and standardized Common Community Elements.

First, I propose to offer ALL eligible households (with or without natural gas) in each of the pilot communities -except MPT[12]-the ability to participate in a Basic Community Package. This Basic Package consists of the following *existing* programs:

- DAC-GT, DAC-SASH, or DAC-CS;
- ESA if on CARE or eligible for CARE;[13] or MIDI;
- Other eligible programs that can be bundled during outreach and enrollment for the above, including but not limited to enrollment in eligible special tariffs (CARE/FERA/Medical Baseline);
- SGIP.

I discuss how these programs will be utilized for this and the Advanced Packages below and in Section 6.8.

Based on party comments, I am proposing examining options that would ensure being able to maximize application of existing programs for the implementation

[12] MPT residents are not *currently* eligible for *existing* referenced ratepayer funded programs in the Basic Package.

[13] SCE has requested a change to the eligibility rules for ESA to facilitate the use of existing funds to post-treatment eligible households. Details of this proposal are on page 26 of their September 10, 2018 filing of updated pilot projects.

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of the proposed packages set forth in this ACR. . These options are discussed below.

Second, pilots will include one of five Advanced Packages to each participating community and the selected package will be available to all households lacking natural gas that earn an annual income within a range to be determined and included in a proposed decision for this phase of the proceeding.[14]. I propose the following diversified Advanced Packages: Advanced Package A: Community Choice: Electrification with Community Solar + Storage[15] or Natural Gas Distribution; Advanced Package B: Household Choice: Gas Extension or Electrification; Advanced Package C: Community Solar and Full/Partial Electrification, as selected by each household; Advanced Package D: Full/Partial Electrification, as selected by each household, and DAC-GT/DAC-CS; and Advanced Package E: Electrification and Household Solar (DAC-SASH). In addition to these packages, the determination of which investments should be piloted in MPT will be further developed in the next Phase of this proceeding. I recommend (F) that PG&E be required to continue to develop the feasibility of three specific options for MPT - exploring an Electric Package in coordination with TID, Renewable Biogas Microsystem Demonstration Project (the current PG&E proposal), and a Renewable Biogas Tank System Demonstration Project. We discuss the details of these Advanced Packages and MPT proposal below.

[14] I am seeking comment from the parties on what the appropriate range for the household annual income should be to participate in the pilot projects.

[15] *See* Section 6.8.4 for description of proposed exemption as to portions of the final decision (D). 18-06-027 in]R.14-07-002.

Third, I propose implementing a set of relatively standardized Common Community Elements across each participating pilot project community. These Common Community Elements will include participant outreach and education, bill protection for all-electric customers, workforce training and/or local hiring elements; landlord/tenant participation agreements to address the "split incentive" challenge; the availability of contingency funding to ensure the inclusion of substandard housing and to provide for electrical panel upgrades and/or rewiring; bulk purchasing requirements; data gathering requirement; and a post-implementation evaluation.[16] A key part of these Common Community Elements will be ensuring a relatively uniform and positive customer education experience for residents as they implement their Advanced Package, arrange for the installation of new appliances or structural improvements to their homes, apply for financing, enroll in new rates, and complete the paperwork necessary for all steps. I propose to provide households that are or become eligible for the all-electric tariff with an additional 20% discount on their post-retrofit bill for 20 years to ensure that they are not paying more for their energy costs than before they converted to electricity. We discuss these issues in Section 6.9.4 below.

6.1 High Level Summary of Pilot Projects by Community

In Tables 1 and 2, I summarize my proposal by the general approach (Table 5) and for each community (Table 6).

[16] This ACR does not describe specific data gathering or post-implementation evaluation proposals. In general, I support the approaches proposed by the IOUs and GRID.

Table 5: High-Level Summary of Pilot Project Proposal

Package	Name	Proposed Communities	Total HH Lacking Nat Gas	Total HH Treated
A	Community Choice: Natural Gas OR Electrification	Allensworth Seville	217	217
B	Household Choice: Gas Extension or Electrification	Alpaugh California City Lanare	1,171	509
C	Community Solar and Full/Partial Electrification	Fairmead Le Grand	755	553
D	Electrification and DAC-CS or DAC GTSR	Cantua Creek Ducor West Goshen	479	479
E	Electrification and DAC-SASH	La Vina	84	84
F	Phase III Exploration: Renewable Biogas Microsystem Demonstration Project or IOU electrification fund	MPT	53	
			2,759	1,842

In determining the budgets for each community, in Table 2 below, I have capped the average estimated expenditure per household at $30,000. These per household average budgets incorporate ALL new itemized costs, including administration costs and contingency costs. I include all new costs into these estimated average budgets, and exclude costs of leveraged programs, including ESA/MIDI and DAC-GT/CS/CS+S. The selected program administrator(s) will indicate its itemized budget to not exceed my proposed total community budget, including all BTM costs and specifically a proposed per household subsidy cap in a Tier 2 Advice Letter if the proposal set forth in this ACR is adopted by the Commission.

Table 6: Summary of Commissioner's Proposal by Community (Part 1)

Community	Allensworth	Alpaugh	CA City	Cantua Creek	Ducor	Fairmead
Package	A	B	B	D	D	C
Short Name	Community Choice: Electrification with Community Solar + Storage or Natural Gas Distribution	Household Choice: Gas Extension or Electrification	Household Choice: Gas Extension or Electrification	Full/Partial Electrification, as selected by each household, and DAC-GT/DAC-CS	Full/Partial Electrification, as selected by each household, and DAC-GT/DAC-CS	Community Solar and Full/Partial Electrification, as selected by each household
Solar Power (and possible IFM storage)	DAC-CS w/ storage	DAC-GT; DAC-SASH	DAC-GT	DAC-GT/DAC-CS	DAC-GT /DAC-CS	DAC CS- standalone or with LeGrand
IFM Storage	Possible	no	no	No	possible	possible
BTM Community Storage	1 or 2	1 or 2	0	1 or 2	1 or 2	1 or 2
BTM HH Storage	0	28	0	64	90	152
Community Selection	Yes	No	No	No	No	No
Program Administration	PG&E/GRID if electric; So Cal gas if gas	PG&E and SCG; OR, they jointly hire 3P	SCE /SCG; OR,they jointly hire 3P	PG&E	SCE	GRID
Electrification Option	Full Electrification, PG&E TE	Partial Electrifi-cation, PG&E AS	Full Electrification, SCE	Full Electrification, PG&E TE	Full Electrification, SCE	Premium Electrification, GRID
Max # of Appliances	4	3	4	4	4	5
Grid-responsive water heaters		4 hh	4 hh		4 hh	
Total HH in community	116	225	5254	119	150	401
Total HH w/out Nat Gas	116	46	1110	106	163	253
HH Treated	116	46	448	106	163	253
Proposed Budget / hh	$29,412	$21,600	$22,396	$30,000	$30,000	$30,000
Proposed Budget	$3,411,792	$993,600	$10,033,408	$3,200,000	$6,085,605	$7,590,000

Table 7: Summary of Commissioner's Proposal by Community (Part 2)

Community	Lanare	Le Grand	La Vina	MPT	Seville	West Goshen	Total
Package	B	C	E	F	A	D	
Short Name	Household Choice: Gas Extension or Electrification	Community Solar and Full/Partial Electrification, as selected by each household	Electrification and Household Solar	Phase III-Renewable Biogas	Community Choice: Electrification with Community Solar + Storage or Natural Gas Distribution	Full/Partial Electrification, as selected by each household, and DAC-GT/DAC-CS	
Solar Power (and possible IFM storage)	DAC-GT	DAC CS-standalone or with Fairmead	DAC SASH	NA	DAC-CS+ Storage	DAC-GT/DAC-CS	
IFM Storage	No	possible	no	no	No	no	
BTM Community Storage	1 or 2	1 or 2	0	0	1 or 2	1 or 2	
BTM HH Storage	90	180	99	0	0	126	
Community Selection	No	No	No	No	Yes	No	
Program Administration	PG&E and SCG; or 3P	GRID	GRID	NA	PG&E/GRID; OR SCG	SCE	
Electrification Option	Partial Electrification, PG&E AS	Premium Electrification, GRID	Premium Electrification, GRID	NA	Full Electrification, PG&E TE	Full Electrification, SCE	
Max # of Appliances	3	5	4	NA	4	4	
Grid-responsive water heaters						4 hh	
Total HH in community	150	502	165		122	210	
Total HH w/out Nat Gas	15	502	84		101	210	

HH Treated	15	300	84		101	210	**1842**
Proposed Budget / hh	$21,75.00	$30,000	$30,000		$29,412	$30,000	**$27,663**
Proposed Budget	$171,800.00	$9,000,000	$2,520,000		$2,970,000	$6,300,000	**$52,276,205**

6.2. Community Choice: Natural Gas or Electrification

I propose that the residents of Allensworth and Seville be extended Advanced Package A: Community Choice: Electrification with Community Solar + Storage or Natural Gas Distribution which allows the community to choose to invest their proposed budget towards a gas distribution system OR electrification. I propose authorizing each community a total budget based on the estimated number of eligible households and a per household average budget of $29,412, yielding a total community budget of $3,411,792 for Allensworth and $2,970,000 for Seville. Each community must vote on which direction to take with Advanced Package A. The proposed $29,412 household average budget was derived from PG&E's updated proposal, as this was the least costly proposal offered for each of these communities (*see* Appendix A).

It is important to note that the natural gas distribution system will require leveraging additional outside funding to cover the costs of the entire project. In particular, for Allensworth, I propose dedicating $3,411,792 to the community for their clean energy selection. However, SoCalGas states that the gas distribution system will cost $6,933,100. This results in a funding gap of $3,521,308 for building a gas distribution system in Allensworth. For Seville, SoCalGas states that the gas distribution system will cost $6,794,924. This results in a funding gap of $3,824,924 for gas distribution in Seville. I acknowledge that financing for these funding gaps is a serious challenge for these communities, but the utility could leverage non-ratepayer funds to meet this gap, including but not limited to IOU shareholder funds, county infrastructure funds and USDA Rural Development funds.

If either community selects electrification, the Administrator will build a DAC-CS project WITH Storage. If the pilot is administered by PG&E, the utility

will conduct an RFP (Request for Proposal) for the solar and storage project; if the pilot is administered by GRID, GRID would bilaterally contract with PG&E to develop the solar and storage project.

I propose the solar and storage option because Allensworth is one of the communities served by PG&E circuit "Alpaugh 1104," which is one of PG&E's worst performing electric circuits. Although the circuit serving Seville performed relatively well, residents in both communities expressed concerns about electric reliability.[17] Providing the solar plus storage option for both Seville and Allensworth (which are of similar size in terms of both total households and total unserved households) will provide insights into how having an electrification option affects community choice and experience in differently situated communities. This is particularly true because these will be the only two communities making an overall community-level choice between gas and electrification. This approach supports my guiding principle of testing ways to most efficiently leverage existing programs.

This ACR proposes a community recommendation process to determine whether the community would like to pursue a natural gas distribution system or electrification. Within 20 days of issuance of this ACR, PG&E in coordination with the Pilot Team and Cal PA shall communicate with community residents, convene a community meeting and provide residents an opportunity to provide their recommendation as to which pilot option should be implemented in the community. The format for providing such recommendation shall be developed in conjunction with the Pilot Team and Cal PA, as well as any other parties and be in written form. The written form shall include the signer's preferred option

[17] Cal PA, "Responses to ALJ Ruling Questions," September 10, 2018, Appendix E.

including preferred administrator, name, address, current phone number, signature and date signed. PG&E shall have until November 7, 2018 to serve and file the resident recommendations. Community residents may also provide their recommendations at the November 1st or November 7, 2018 PPH. The community recommendations will be included as part of the proceeding record and considered along with other comments in preparing the proposed decision. The community recommendations are recommendations that will be fully considered, however the recommendations do not guarantee the community's desired clean energy option will be adopted in the Phase II decision.

Depending on the option provided in the final decision, if the natural gas option is approved, participating households may choose to apply their subsidy to seek gas line extensions from existing gas main lines and necessary home upgrades and gas appliances. Alternatively, if the electrification option is approved households wishing to electrify could receive either a Full or Partial Electrification Advanced Package offering based on GRID or PG&E's no-cost Total Electrification proposal which, depending on their home and preferences, may allow for replacement of up to 4 appliances (water heater, space heater/cooling, cooking range, clothes dryer).

6.3. Household Choice: Gas or Electrification

For California City, Alpaugh and Lanare, I propose an individual household approach and call this Advanced Package B: Household Choice: Gas Extension or Electrification. Again, I propose authorizing each of these communities a total budget based on the estimated number of eligible households and an estimated average household total budget. For California City, I propose an average per household budget of $22,396, yielding a total community budget of $10,033,408. For Alpaugh, I propose an average per

household budget of $21,600, yielding a total community budget of $933,600, and for Lanare, I propose an average per household budget of $21,475 yielding a total community budget of $171,800 (*see* Table 7 above). I derived the average per household budgets of approximate $22,000 for all three of these communities from SCG's updated proposal (*see* Appendix A).

This $22,000 average per household budget includes ALL costs – such as BTM appliance costs, installation costs, any panel upgrade or rewiring costs, contingency costs, administrative costs, ME&O costs, data gathering and evaluation costs, etc., as discussed above. As a result, the total subsidy available to each household to procure and install appliances will be less than $22,000 per home, possibly as little as 60% of this amount, based on analysis of the IOU and GRID's submitted budgets. As described above, the program administrator will indicate its proposed per household subsidy cap in a Tier 2 Advice Letter to be filed within 60 days of the approval of the final decision on this matter. During the pilot, participating households may choose to apply their subsidy to seek gas line extensions from existing gas main lines and necessary home upgrades and gas appliances. Households wishing to electrify could select that option and receive either a Full or Partial Electrification Advanced Package offering depending on their home and preferences.

For California City, I propose offering Advanced Package B to a limited subset of the households without gas. SoCalGas proposed limited gas extensions to 224 households; SCE proposed fully-subsidized partial electrification for 500 households. Particularly because California City is an outlier among the 12 pilot communities in terms of its size, and to take advantage of the learning opportunity provided by the two different options proposed, I propose the following: Authorizing gas extensions to 224 households with an average

household budget of $22,000; authorizing 224 households to be fully/partially electrified with an average household budget of $22,000;[18] and, providing the basic package to all Advanced Package B participants and the remaining residents in these three communities both with and without gas.[19] In addition, I support PG&E and SCE's proposals to offer a small number of hot water heater demand response installations, so I propose including these as well in the Advanced Package B.

SCE will administer the electric component of Package B and SoCalGas will administer the gas component. As such, SCE and SoCalGas will need to establish an information sharing agreement to ensure that the same customer is not participating in both pilots. This agreement may or may not require a shared implementer.

In addition, PG&E's updated San Joaquin Valley pilot project proposal indicated interest in leveraging its residential and small business electric hot water heater program under AB2868, possibly in Alpaugh. AB 2868 requires the IOUs to propose programs and investments for 500 MW of new energy storage. I support that a minimum of 4 such systems be installed in Alpaugh, pending approval in A.18-03-001.

For both Alpaugh and Lanare, I am proposing that electrification consist of up to 3 appliances (cooking, hot water, heating / cooling), and for California City

[18] Authorizing gas extensions to 224 households would include an appliance subsidy cap per home of approximately 60% of $22,000, or $13,200 per home for all BTM costs; authorizing 224 households to be fully/partially electrified would takes the same approach.

[19] Although the Basic Package under this pilot is targeting outreach and implementation to the 1,110 HH in California City without gas, the remaining 4,144 HH with gas are still largely eligible for the basic elements (ESA, DAC-GT, etc.). Therefore, the pilot administrators should attempt to leverage these existing programs for the greater eligible population in California City.

I am proposing up to 4 appliances (cooktop, heat pump space heating /cooling, water heater, clothes dryer). This reflects the Appliance Specific (AS) approach proposed by PG&E for Lanare and Alpaugh and SCE's proposed electrification package for California City.

In contrast to California City, the pilot in Alpaugh and Lanare will treat *all* households without gas with the Advanced Package B - a total of 46 households and 15 households respectively. My proposal does not guarantee either the electric administrator any specific number of participating households, nor does the gas administrator have a guarantee that any specific number of households will elect to connect to the gas system. Unlike California City, there is no greater pool of households to choose from other than the 46 and the 15 that are eligible that currently lack gas. In the case of Alpaugh and Lanare, the electric administrator will be directly competing with the gas administrator for each customer and their accompanying budget. As such, PG&E and SoCalGas will need to establish an information sharing agreement to ensure that the same customer is not participating in both pilots. This agreement may or may not require a shared implementer.

For all three of these communities, the electricity provider will work with the chosen Administrator (which could be the same) to conduct the outreach and enrollment of all community households in the basic package solar element- either the DAC-GT or DAC-CS. My proposal is to default to DAC-GT given the readiness of that offering in PG&E service territory.[20]

[20] In PG&E's Advice letter 5362-E to implement DAC-GT and DAC-CS, they propose to first utilize and assign eight (8) existing GTSR solar facilities that are unallotted and eligible to serve customers under DAC-GT.

6.4. Full Electrification and Community Solar

For the communities of Fairmead and Le Grand, I propose Advanced Package C: Community Solar and Full/Partial Electrification, as selected by each household. These communities are located 11 miles apart. I proposed to limit the average per household budget for these communities to $30,000, yielding a total budget of $7,590,000 for Fairmead and $9 million for Le Grand. In both cases, I derived these average household budgets and total community budgets by reducing budgets as proposed by GRID (*see* Appendix A).

Package C will be administered by GRID utilizing their full electrification package of up to 5 appliances per household. As proposed by the GRID, this "premium" full electrification package would provide for removal of propane and/or wood burning appliances and installation of a full suite of electric options as needed, including stove/range, water heater, space heater /cooling, microwave and clothes dryer.

As elsewhere, pilot offerings in these communities will include subsidized BTM residential storage to provide increased reliability to households. I describe this approach in detail in Section 6.8.4 below.

In selecting GRID as the administrator of Package C, I propose that PG&E provide GRID with a bi-lateral DAC-CS Power Purchase Agreement (PPA) as detailed in the GRID's Updated Pilot Proposal. In addition, I propose that the community solar project(s) authorized in this Package C, the existing geographic limitation of 5 miles be increased to 15 miles. I provide details regarding these elements below.

6.5. Full Electrification + DAC-CS or DAC- GT

For the communities of Cantua Creek, Ducor and West Goshen, I propose Advanced Package D: Full/Partial Electrification, as selected by each household, and DAC-GT/DAC-CS. I again propose to limit the average per household budget for these communities to $30,000, yielding a total budget of $3.2 million for Cantua Creek, $6.086 million for Ducor, and $6.3 million for West Goshen. I derived these average household budgets and total community budgets by reducing budgets as proposed by PG&E and SCE for these communities as these exceeded this cost level (see Appendix A).

This ACR proposes PG&E and SCE will serve as program administrators for Package D in their respective service territories. As such, the communities will receive a slightly different electrification option. PG&E, under my proposal, will offer its Total Electrification package in Cantua Creek and SCE will offer its Full Electrification package in Ducor and West Goshen. Package D will be offered to all households lacking gas in these communities, estimated at 106 for Cantua Creek, 163 in Ducor and 210 in West Goshen. I also note that one of the differences between this package and Package C is that GRID will administer Package C; while the utilities may offer either DAC-CS or DAC-GT, GRID would provide a DAC-CS project only. Testing the differences between these options in the proposed communities will provide useful learnings about both programs and administrative models.

Up to 280 households across the three communities will also be given the opportunity to install in-home storage, leveraged using the SGIP SJV allocation and to take advantage of other Common Community Elements as described below.

6.6. DAC SASH, Full Electrification

For the community of La Vina, I propose a community-specific package to leverage and expand upon the relatively-developed existing level of rooftop solar and all-electric homes in the community, which I call Advanced Package E: Electrification and Household Solar (DAC-SASH). I I propose a per household average budget of $30,000 as proposed by GRID, yielding a total community budget of $2,520,000. With GRID administering, the community would receive targeted support to add rooftop solar to participating households via SASH/DAC-SASH funds; household storage using leveraged SGIP funds; and premium full electrification of appliances as proposed by GRID (*i.e.,* with GRID administering, the community would receive targeted support to add rooftop solar to participating households via SASH/DAC-SASH funds; household storage using leveraged SGIP funds; and premium full electrification of appliances as proposed by GRID (i.e., up to 5 appliances/home). This unique approach will provide valuable learnings that contrast with those explored in the other pilot packages.

6.7. Monterey Park Tract- Feasibility Assessment of Alternatives

For MPT, I propose that in the next Phase of this proceeding we continue to evaluate the feasible options for providing cleaner energy to the community. I recommend that PG&E be required to develop the feasibility of three specific options for MPT:[21] (a) an electric option in coordination with Turlock Irrigation District; (b) a Renewable Biogas Microsystem Demonstration Project (the current PG&E proposal), and (c) a Renewable Biogas Tank System Demonstration

[21] Although PG&E would be required to further develop the three alternatives, other parties are also able to participate in the next phase of this proceeding on developing these or other alternatives.

Project, which would demonstrate a tank refilling system for community use of renewable biogas (instead of building a direct distribution network). PG&E should submit a summary of an assessment of the feasibility of these three alternatives in a Tier 2 Advice Letter in 210 days.

For option (a) it is important to explore innovative partnerships with the local electricity provider, Turlock Irrigation District, on any potential electrification option(s). This potential partnership will also provide valuable lessons for the other SJV communities whose electricity is provided by a public entity. There are at least 15 of these like communities with limited access to gas, who are not served electricity by an IOU but rather by public electricity providers.

As part of (b) and (c) of the three alternatives, PG&E should continue to explore if sourcing from local renewable gas is viable, and if so under what conditions and time frame.

In order to ensure that this work continues, I propose to authorize PG&E to establish a memorandum account for tracking expenses for further developing these options.

6.8. Leveraging Existing Programs for a Community Approach

As mentioned, the summary of my proposal for each community discussed above addresses only the homes proposed for electrification or natural gas, and the household estimates and budgets that I provide reflect this. However, my proposal takes a "community approach" in that, as part of or concurrent with the delivery of other pilot services, each household in the twelve-pilot community will be educated about and offered the chance to participate in existing programs, including existing ESA/MIDI, DAC-CS/DAC-GT and SGIP SJV allocation offerings (*i.e.* BTM storage). Program administrators

would then draw upon existing, already approved budgets for these other programs to enroll pilot project community residents. As a shorthand, I call this approach "leveraging."

6.8.1. Leveraging ESA and PG&E's MIDI Program

The ESA Program provides no-cost weatherization services to low-income households that meet the CARE income guidelines. Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weather-stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs that reduce air infiltration.[22]

By our estimates as summarized in Table 1, all but one of the pilot communities meet the criteria for ESA Targeted Self-Certification. Targeted Self-Certification is a third-party enrollment procedure designed to ease enrollment processes in ESA Program. Each IOU determines eligibility for self-certification based on their identification of geographic areas of their service territory where 80% of the customers are at or below 200% of the federal poverty line. Applicants residing within these targeted self-certification areas must sign a "self-certification statement" certifying that they do indeed meet the current income guidelines established for participation in the ESA Program. The IOUs retain this self-certification statement in lieu of other income documentation or proof of participation in a categorical eligibility program.[23]

I propose using this approach to certify ESA eligibility in all of the pilot project communities. For communities where less than 80% of customers are at

[22] http://www.cpuc.ca.gov/esap/

[23] Statewide ESA Policy and Procedures Manual, at 14.

Footnote continued on next page

or below 200% of the federal poverty line, I propose using the CARE standard enrollment verification process: self-attestation followed by auditing of a percentage of enrollees via the post enrollment verification process (PEV).[24]

As noted by the GRID, PG&E offers a MIDI program in addition to its ESA Program. The MIDI program serves households that are at 201% - 300% of the Federal Poverty level and offers weatherization measures as does ESA. Households meeting these income criteria would be offered MIDI packages within PG&E service territory.

In its updated application, SCE requested a one-time exception for pilot participants to the ESA Weatherization measure rules, which currently require customers to already be on an "All-Electric" rate to qualify for electric weatherization measures. Due to the timing of enrolling customers into the All-Electric rate, and the weatherization treatment, under the current rule, SCE's assigned contractor would have to install electric space heating first, then enroll the customer into the All-Electric rate, then come back to perform weatherization treatment. Allowing the weatherization treatment prior to or in parallel with the appliance installation will help to reduce both the cost of the pilot and impact to the customer with a second visit to the home.

I am proposing an exemption to this rule limited to the pilot proposals presented in this ACR. This exemption will address SCE's valid concerns with the ESA Program[25] order in which treatments are implemented, and will again

[24] CARE D.16-11-022.

[25] The most recent ESA Proceeding is A.14-11-007 et. al., which is now closed. New ESA applications will be filed January 2019. I strongly encourage the IOUs to request that such a program change be included within the scope of the next ESA proceeding.

Footnote continued on next page

only apply for purposes of any pilot projects authorized in this proceeding. For all households that select electrification from the 11 pilot communities regardless of administrator, I propose a one-time exemption to the ESA Weatherization measure eligibility rules[26] as described above in order to allow for the most efficient process and maximizing the utilization of the ESA program for implementing electrification projects in pilot host communities.

6..8.2. Leveraging CARE/FERA

Low-income customers that are enrolled in the CARE program receive a 30-35% percent discount on their electric bill and a 20 percent discount on their natural gas bill. Customers may also be eligible for CARE if they are enrolled in public assistance programs such as Medicaid/Medi-Cal, Women, Infants and Children Program (WIC), Healthy Families A & B, National School Lunch's Free Lunch Program (NSL), Food Stamps/SNAP, Low Income Home Energy Assistance Program (LIHEAP), Head Start Income Eligible (Tribal Only), Supplemental Security Income (SSI), Bureau of Indian Affairs General Assistance, and Temporary Assistance for Needy Families (TANF) or Tribal TANF.

Families whose household income slightly exceeds the CARE allowances, and that meet other requirements such as family size, qualify to receive a FERA (Family Electric Rate Assistance) discount: a 12% discount on their electricity

[26] Statewide Energy Savings Assistance Program 2017-2020 Cycle Policy and Procedures Manual, Section 2.3.1, at 18.

Footnote continued on next page

bill.[27] FERA is available for customers PG&E and SCE customers in the San Joaquin Valley.[28]

6.8.3. Leveraging Medical Baseline

All residential customers are billed a certain amount of their natural gas and electricity use at their utility company's lowest residential rate. This is called the "Baseline Allowance" and it is set depending on the climate zone where the home is located whether it is the utility's "winter" or "summer" season.

Extra allowances of natural gas and electricity are billed at the lowest rate for customers who rely on life support equipment, or those who have life threatening illnesses or compromised immune systems. These extra allowances are called "Medical Baseline." "Life support equipment" means equipment that uses mechanical or artificial means to sustain, restore, or supplant a vital function, or mechanical equipment that the customer relies upon for mobility both within and outside of buildings.[29] As many parties have suggested, my proposal would require administrators to educate pilot community residents about this program and enroll eligible, interested households, either as part of or concurrent to delivery of other pilot project services.

6.8.4. Leveraging DAC-GT & DAC-CS

The DAC-GT program provides a 20 percent bill discount to customers in disadvantaged communities. DAC-GT allows customers to choose clean energy options without the need to own their home and without the cost of installing their own solar systems. The program is modeled after the existing Green Tariff

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[27] SB 1135 (Bradford) signed by the Governor last month will increase the FERA subsidy to 18%.

[28] http://www.cpuc.ca.gov/General.aspx?id=976

[29] http://www.cpuc.ca.gov/medicalbaseline/

portion of the Green Tariff/Shared Renewables Programs. It will be available to customers who meet the CARE or FERA income eligibility requirements and will incentivize the buildout of solar energy systems in DACs.

The DAC-CS program provides a 20 percent bill discount to customers in disadvantaged communities including the 12 proposed San Joaquin Valley pilot project communities. To qualify, 50 percent of the relevant project's capacity must be reserved by low-income customers, defined as those meeting the qualifications for either CARE or FERA. Given the demographics of the pilot communities, any community receiving a Community Solar offer will allow for all households to be eligible.[30]

The DAC-CS program as approved requires the community solar project to which the DAC-CS customers are subscribing to be located within 5 miles of the customers' community, as defined by its census tract borders. GRID has requested that GRID not be subject to a competitive solar solicitation to take part in the DAC-CS program, and that the locational requirement be expanded from five miles to 50 miles, for SJV DACs only. Therefore, I am proposing a limited test case exemption that only applies as indicated above and IF in the final proposed decision GRID is selected as the Advanced Package administrator for a community(s). Under these circumstances GRID should NOT be subject to a competitive solar solicitation in order to take part in DAC-CS, and PG&E shall enter into a bi-lateral contract for the project.[31]

In addition, Fairmead and Le Grand are located approximately twelve miles apart. In order to utilize the DAC-CS program as part of this pilot project, I

[30] R.14-07-002.

[31] I am specifically seeking party comment on this portion of the proposal presented herein.

propose an exemption to the locational requirement for the DAC-CS program from five to fifteen miles. GRID will however be subject to the same price cap established in the originating DAC-CS decision.

PG&E and SCE are proposing to each utilize a single solicitation to procure for both the DAC-GT and the DAC-CS, including those projects that located in the SJV pilot communities. For PG&E, the procurement will run in conjunction with the Regional Renewable Choice program solicitations.[32] At that time, the DAC-GT and the DAC-CS programs will each have separate capacity allocations and bid requirements within the same solicitations. In the event that Allensworth and/or Seville select PG&E as the administrator, I am proposing to include a specific capacity allocation for the Community Solar + Storage Projects within their single solicitation. This inclusion will only apply to the pilot projects authorized in this phase of the proceeding.

In the scenario that the communities of Allensworth and/or Seville select their Advanced Package as a Community Solar + Storage Package, regardless of Administrator, the MWs built under the SJV CS+S project(s) will count towards the overall PG&E DAC-CS 18 MW obligation.

6.8.4. Leveraging the Self-Generation Incentive Program

As mentioned above, I am proposing leveraging SGIP funds for these pilots as part of the Basic Package for most communities. Leveraging existing program funds--particularly in light of the current underutilization of SGIP Equity Budget funds—is the best way to alleviate gaps in the current IOU and GRID proposals and to meet this proceeding's (R.15-03-010) policy goals.

[32] Existing solicitation that is inclusive of other existing renewable procurement programs, like Enhanced Community Renewables.

No party proposed storage in addition to community solar, and the existing proposal from GRID for residential storage would require a substantial customer contribution to the system cost, which I believe would make the option unattainable for most participants and therefore greatly limits its value to the pilot. Most importantly, the existing proposals do not optimally provide the reliability benefits of storage to pilot communities, which is particularly important in communities where residents expressed particular concern about a high frequency of electric power outages. Such concerns may impact customers views and choices around electrification. Providing for storage in some of the pilot communities will allow us to explore the in-home option's effectiveness in providing backup power during outages. It will also provide information on how residents view this option as opposed to the community storage option. Storage will also provide educational benefits and insights into residents' preferences for and experiences with this emerging technology, especially in terms of how it affects their experience and preferences regarding electrification.

Therefore, I am proposing the following modifications with regards to SGIP:[33]

- **A $10 million set-aside within SGIP's Equity Budget for the pilot communities.** All of the leveraged SGIP storage options in my proposal would be funded out of this set-aside. I refer to this as the SGIP SJV allocation.
- **Fully subsidized residential storage.** I propose offering residential BTM storage as an option and system costs would be fully subsidized up to a cost cap. This cost cap would be $11,979 per household, which is equal to the

[33] SGIP proceeding number is R.12-11-005. I propose that the final decision in this phase of the proceeding direct that these proposed modifications be addressed in the SGIP proceeding on an expedited basis to allow for timely implementation of the pilot projects. This ACR specifically requests parties to provide comments on these proposed modifications.

average total residential eligible system costs within SGIP from January 2017 through mid-September 2018. I also propose that, consistent with *current* SGIP rules, on-site residential solar would not be required.

- **Fully subsidized "Community Service Storage" at community centers or schools.** For specific communities, I propose the pilot option include a fully subsidized small commercial-sized storage installation BTM at an eligible community location providing a community service, such as a school, community center, or public building. The system costs would be fully subsidized up to a cost cap of $26,379, which is the average total eligible system costs within SGIP for small commercial systems up to 10 kW from January 2017 through mid-September 2018.
- **A pilot community-specific income cap.** Consistent with the rest of my pilot proposals, SGIP leveraged funds for household storage would be subject to my proposed annual income cap level, not the broader SGIP Equity Budget income cap.

As discussed in the sections detailing my proposed packages for communities, I am proposing both residential and non-residential storage funded by a SGIP SJV allocation. Table 8 below includes details reflecting my assumptions about the number of residential and non-residential systems that would be installed. I am assuming a 60% uptake of residential storage among households.

Table 8: Proposed SGIP SJV Systems and Estimated Costs

Proposed SGIP SJV Allocation and Total Budget	Residential storage subsidy cap per household		Non-residential storage subsidy cap per system
$ 10,000,000	$ 11,979		$ 26,000
	Households offered residential storage	Residential systems installed, assuming 60% uptake	Community Service systems proposed
Allensworth	45	27	
Alpaugh	46	28	1
California City	0	0	
Cantua Creek	105	63	1
Ducor	150	90	1
Fairmead	252	151	1
Lanare	100	60	1
Le Grand	250	150	1
La Vina	165	99	
Seville	35	21	1
MPT	0	0	1
West Goshen	210	126	1
Total systems	**1358**	**815**	**9**
Estimated subtotals		**$ 9,760,489**	**$ 237,411**
Estimated total cost			**$ 9,997,900**

6.8.5. Common Elements

My proposal includes core elements that are common across all pilots. These elements are intended to further enhance the customer experience and to reinforce a community approach. I propose elements that are focused on efficiency such as the Community Energy Navigator, bulk purchasing and income caps for eligibility and elements that are targeted to ensure customer bill savings, including a bill protection discount and landlord tenant agreements. Finally, the parties have all recommended a component of community

engagement and economic development through workforce training and local hire features. Together, these common elements will provide for effective pilots and a positive experience for communities and residents.

6.8.6. Community Energy Navigator

To accomplish the community pilots and effectively leverage existing programs, I propose that the IOUs and/or their contractors undertake an intensive outreach effort in each community to educate each household about already existing programs for which they may qualify and to enroll those interested. This focused effort should occur concurrent with or as part of the pilot project implementation, as is most feasible. I propose that each interested community develop Community Energy Navigators (CENs), as suggested by PG&E. PG&E proposed that all pilot project communities could develop a cohort of residents to serve as trusted resources on energy issues. Each community would nominate members to receive free training to serve as a local expert, gather data and provide informal energy guidance. These CENs would help educate community members about existing energy program options and would engage community members in the broader pilot project implementation process. To support this, I propose to earmark a portion ($100,000) of my total proposed budget for each community as discussed above to support the development of Community Energy Navigators.

Further, these CENs should be engaged to assist with "continuous community feedback loop" throughout the pilot project planning, implementation and evaluation, as previously recommended by Self Help Enterprises, the Leadership Counsel for Justice and Accountability and Greenlining Institute.

6.8.7. Workforce Training / Local Hire

On the issue of workforce training and local hire, I propose that all of the pilot administrators offer a hybrid of GRID and PG&E proposed approaches in all pilot communities. In brief, GRID proposed to offer both solar and energy efficiency retrofit workforce development opportunities that include hands-on installation and classroom learning elements. PG&E also proposed to offer energy education experiences to local K-12 students through its existing program.

Regarding workforce development, PG&E proposed to work with local Workforce Investment Boards and Career Readiness Centers to provide awareness of opportunities for new workers to participate in home retrofit jobs. PG&E proposed to engage inspection, auditing and installation contractors from the locality of each pilot and to screen them for required certifications and skills, excellent customer satisfaction ratings, and the extent to which the team includes local workers. GRID further proposed using the pilot phase to gather data and lessons on workforce issues to support deeper consideration of a local hire approach such as proposed by the California Energy Commission during Phase III of this proceeding.

My proposal is that each program administrator implement these general approaches.

6.8.8. Income Caps

As previously discussed within specific proposals, I suggest using an annual income cap to determine a household's eligibility for the advanced packages. In other words, I propose allowing households in each community that fall under this income cap to participate in the advanced package offering specific to their community. I am also as stated above requesting parties to

provide comment on what the appropriate annual income cap should be for purposes of package eligibility.

For California City and LeGrand the advanced package offering is not available to the entire community, the annual income cap will apply to the eligible households, and those qualifying for CARE or FERA should be prioritized.

6.8.9. Bill Protection/Guaranteed Savings

GRID proposes to provide additional bill protections to low-income customers that electrify at least one appliance to ensure that they receive significant savings and are not harmed financially by increased electric loads resulting from electrification. GRID recommends providing participating households with post-retrofit electric bills equivalent to a 20% bill discount off their pre-pilot electric bill, equivalent to roughly a 40% total discount off their post-retrofit electric bill. GRID proposes that this additional discount serves as an additional customer bill savings discount, above the DAC-GT / DAC-CS tariff itself.

I propose adopting this bill protection mechanism for all customers that earn less than the approved annual income cap that are (or become) all-electric residential customers.[34] I propose that these customers are provided an additional 20% bill discount on top of any existing bill discounts, most notably for those customers that participate in DAC-GT or DAC-CS (or DAC-CS+S as proposed). I also propose that the cost recovery mechanism be the same as that previously authorized for the DAC-GT and DAC-CS 20% discounts—within the

[34] Cal PUC 739 (b) states: All-electric residential customers are residential customers having electrical service only or whose space heating is provided by electricity, or both.

Energy Resource Recovery Account (ERRA) as part of the GTSR bill discount accounting.

For all households that are electrifying but have not yet transitioned to time-of-use rates, the Super User Electric Surcharge may still apply following the rate designs authorized in R-12-06-013. In order to protect such households from higher energy bills as a result of electrification I propose an exemption from any otherwise applicable Super User Electric Surcharge for customers in the 12 pilot communities that have or are converted to all-electric rates as a result of the pilot.[35]

These approaches reflect the need to offset increased electricity bills. For households that are not electrifying, the record makes clear that gas costs are lower than propane costs, so I propose no additional mechanism of ensuring that energy costs will not rise, other than requiring that any gas appliances installed be more efficient than the propane models they replace.

6.8.10. Approaches to Substandard Housing

GRID, PG&E and SCE all included contingency funds of between 20% - 30% in their budget proposals. Designed to address low-income households in greatest need of improvements to enable the installation of new appliances, these funds could be used to address health or safety requirements that are discovered during the electrification process and minimal-moderate structural improvements. The IOUs and GRID also included funding for BTM improvements like electrical panel upgrades, rewiring or the installation of new breakers for appliances, typically within their general estimated BTM costs. SCE,

[35] Note: any households already transitioned to time-of-use rates will NOT see the Super user charge.

for instance, assumed that each participant would require these electrically-related improvements at an average cost per households of $4,530. GRID's approach to its contingency fund was based on setting aside an additional 20% of each community's total low-income retrofit budget (appliance purchase, installation and any necessary electrical upgrades) for health, safety or structural repair purposes. All three pilot proposers noted that a dwelling with significant code violations or in extensive need of home repair may not be able to qualify to be part of the pilot.

I agree that a contingency fund for necessary safety, health and minimum-moderate structural repairs is necessary and should be established for all pilot project communities. Like GRID, I propose that 20% of the total retrofit budget per community, participating households as discussed above, be set aside to address structural improvements, health and/or safety requirements. These budgets should be prioritized for the households most in need. However, I also recognize that some homes are beyond repair and will not be able to participate in the pilot.

In general, the budgets I propose in Section 6.1 include contingency funding, as they are based on the estimated average cost per household implied by the IOU's and GRID's total budgets. However, I recognize that in most cases I have reduced the proposed budgets for each community. Therefore, I propose that the Commission also authorize SCE, SoCalGas and PG&E to establish memorandum accounts solely for use to supplement contingency fund requirements for the neediest households that cannot be met from within my proposed pilot project budgets. The IOUs should track any additional contingency expenditures towards these neediest households starting 180 days from adoption of a final decision and should file quarterly status reports on the

memorandum accounts to the R.15-03-010 proceeding. SCE and PG&E should include provisions providing for reimbursement of additional contingency funding requirements in contracts established providing for GRID's pilot project administration as discussed above. My proposal is that contingency expenditures tracked in the memorandum accounts established for this purpose must not exceed five percent of the total community budget approved for each pilot project.

6.8.11. Split Incentives Challenges

Both tenants and property owners are likely to benefit from the pilot projects, with the former realizing a decrease in total energy costs and the latter receiving relevant property improvements. Many of the parties provided ideas on how to ensure that the split-incentive continues post-retrofit.

GRID proposed using a version of the building owner affidavits developed in the SOMAH program to secure agreement from a landlord not to increase rent or to displace a tenant after a home has been retrofitted and noted that community solar crediting may provide additional incentives to landlords to engage in the pilot project. SCE proposed terms and conditions as part of the enrollment agreement to reflect the need for both landlord and tenant engagement (mutual consent) and agreement (consent) to participate in the program. The terms, application and enrollment process would also include language restricting rent increases post property related upgrades due to the pilot activities.

Research on similar types of interventions that benefit both rental property owners and tenants have identified that it may be difficult to enforce restrictions on rent increases. To address this, SCE proposed to examine the potential impacts on tenants of treated dwellings through the duration of the pilot.

Likewise, as part of the pilot evaluation, SCE proposed that market characterization, housing type and ownership data be collected from both participants and non-participants in the pilot communities to understand how different pilot benefits are ultimately distributed.

I propose to adopt the SCE protocols to provide for a continued split-benefit.

6.8.12 Bulk Purchasing

Where possible, I propose that the program administrators individually or collaboratively undertake bulk purchasing to procure in-home appliances for these pilots. California's IOUs have a long history of bulk purchasing energy efficiency measures to support their low-income energy efficiency programs. For example, SCE began the bulk purchase of CFLs and evaporative coolers in the 1980's and now competitively bids the purchase of all program appliances including refrigerators, HVAC equipment, window/wall AC's and other appliances.

Through a bulk purchasing approach, an IOU engages with a product manufacturer or large distributor to secure reduced per unit costs resulting from economies of scale. Because of this, the IOUs' ESA Program has historically been able to procure larger quantities of materiel at a price point far more competitive than can be achieved at market or on an individual scale. Beyond reduced measure costs, the bulk purchasing of appliances, measures and weatherization products has additional benefits. Through bulk purchasing, the Utility can set minimum manufacturer specifications, secure extended warranties, and ensure inventory availability throughout its service territory.

Bulk purchasing of appliances can produce additional efficiencies. Rather than relying on an additional network of delivery contractors or installers, a bulk

purchasing agreement can also include a delivery and installation arrangement. In the ESA Program, this flow reduces the number of customer visits by multiple contractors – reducing participation attrition and customer friction points. Using a bulk purchasing approach for the pilot projects may help reduce the "truck rolls" in participating communities and have climate, traffic, and other environmental and societal benefits.

7. Program Administrator

My proposal suggests that there can be up to four different administrators selected for the twelve pilot communities, – PG&E, SCE, SoCalGas or GRID. In some instances, I have proposed a specific program administrator for a community, in others, I am undecided. In all cases, I will be taking comment on who to select as the administrator for each community. The final proposed decision will have a selected administrator for each community.

There is benefit in a diverse set of administrators to learn if different approaches yield different results and which models may be best to replicate in the future.

In addition, as discussed above, all administrators provide a budget for each community with a full itemization of costs and how they propose to meet the targeted household conversions within the allocated budget.

8. Conclusion and Specific Questions

Parties are requested to comment on the proposal outlined in this ACR. In particular, parties' comments should address the following:

a. Comment on the proposal overall, with emphasis on type (technology) of pilot project proposed, and cost.
b. In commenting on cost of pilot projects consider cost of individual projects as well as overall total budget.

d. Comment on how pilot projects will be best able to leverage funds available in other Commission or CEC programs.

e. Comment on process for contracting for pilot projects including whether an RFP should be issued, or if Administrators should be selected via the final PD

f. Comment on how the pilot projects set out in this proposal may be coordinated with other related proceedings.

g. Comment on the cost-effectiveness of the pilot projects.

h. Comment on whether there should be a project or household cap for each pilot project and what levels or range such cap should be set at.

i. Comment on the potential modifications for the Monterey Park Tract proposal and deferral of consideration of the proposal to Phase III of the proceeding.

j. Comment on if Community Solar plus Storage (authorized under the Community Choice Package A) can provide reliability benefits to the communities and if so, how.

k. Comment on the community recommendation process set-forth for the communities of Allensworth and Seville.

l. Comment on the Household Choice Package B should have one single administrator or multiple.

m. Comment on the specific proposals set out above as to the following programs/issues:

   i. ESA (A.14-11-007): Timing;

   ii. DAC-CS (R.14-07-002): Miles; Administrator Selection/bi-lateral contract; Allocation of MW within Solicitations; Bill Discount;

   iii. SGIP (R.12-11-005): SJV Allocation;

   iv. Rate Design (R.12-06-013): Super User Electric Charge.

Opening comments shall be due on October 12, 2018. Reply comments shall be due on October 22, 2018.

An all-party meeting to discuss this proposal will be held on November 1, 2018 in Fresno at the SJVAPCD office prior to the scheduled Public Participation Hearing. The public may observe the all-party meeting remotely at the SJVAPCD offices in Modesto and Bakersfield. Any party wishing to speak at the all-party meeting should contact Sarah Sharpe [sarah.sharpe@cpuc.ca.gov] by no later than October 26, 2018.

IT IS RULED that:

1. Party comments on the proposal set forth in this Assigned Commissioner's Ruling shall be filed and served by October 12, 2018. Reply comments shall be filed and served on October 22, 2018.

2. NOTICE IS HEREBY GIVEN THAT an all-party meeting is scheduled for November 1, 2018 in the San Joaquin Valley Air Pollution Control District Offices, Governing Board Room located at 1990 E. Gettysburg Avenue, Fresno, CA 93726. Any interested party is invited to join. Parties should RSVP to Commissioner Guzman Aceves Advisor Sarah Sharpe at Sarah.Sharpe@cpuc.ca.gov by no later than 5:00 p.m. on October 26, 2018 if they wish to speak at the all-party meeting. The Commissioner and assigned Administrative Law Judges will be present for the all-party workshop. In person participation is encouraged.

3. NOTICE IS HEREBY GIVEN THAT a public participation hearing will be held on November 1, 2018 at 6:15 p.m. in Fresno California at the San Joaquin Valley Air Pollution Control District Central Office, Governing Board Room, at 1990 E. Gettysburg Avenue, Fresno California 93726 with remote access at San Joaquin Valley Air Pollution Control District Northern Office at 4800 Enterprise Way, Modesto, California 95356 and San Joaquin Valley Air

Pollution Control District Southern Office at 34946 Flyover Court, Bakersfield, California 93308.

4. NOTICE IS HEREBY GIVEN THAT a public participation hearing will be held on November 7, 2018 at 6:00pm in Tulare California at the Tulare Council Chambers located at 475 North M Street Tulare, CA 93274.

5. PG&E, SoCalGas, and SCE shall coordinate with the Commission's Public Advisors Office on noticing ratepayers of the aforementioned public participation hearings, which shall include both notice in local newspapers and on the utilities' website.

6. This Assigned Commissioner's Ruling shall be served on the service lists for the following proceedings: R.12-11-005, R.12-06-013, A.14-11-007, and R.14-07-002.

7. Parties in proceedings R.12-11-005, R.12-06-013, A.14-11-007, and R.14-07-002 may provide comments on the proposals as it relates to the proceeding they are party to by serving the service list in this proceeding and directing the comments to Tory Francisco, Energy Division by email at tory.francisco@cpuc.ca.gov .

8. PG&E, in coordination with the Pilot Team and Cal PA, shall reach out to the communities of Allensworth and Seville to seek resident recommendations consistent with the process described in this assigned Commissioner's ruling.

Dated October 3, 2018, at San Francisco, California.

/s/ MARTHA GUZMAN ACEVES
Martha Guzman Aceves
Assigned Commissioner

Appendix A-

Comparison of IOU and GRID Updated Proposed Budget and Commissioner's Proposed Budget

	Community	Allensworth	Alpaugh	CA City	Cantua Creek	Ducor	Fairmead	Lanare	Le Grand	La Vina	Seville	West Goshen	Total
Total HH in community		116	225	5254	119	150	401	150	502	165	122	210	7427
Total HH w/out Nat Gas		116	46	1110	106	163	253	15	502	84	101	210	2706
HH Treated		116	46	448	106	163	253	15	300	84	101	210	1842
GRID	Average cost / hh	$42,000	$42,000		$41,190	$41,614	$38,451	$34,832	$40,433	$37,905	42,000	$42,791	
PG&E		$29,412	$28,043	$34,860	$30,189		$16,798	$50,909.09	$15,000	$30,000	29,412		
SCE						$37,335						$34,348	
SCG		$62,849	$21,600	$22,396		$59,589		$21,475.00			65,336	$48,769	
Commissioner's Proposed Budget / hh		$29,412	$21,600	$22,396	$30,000	$30,000	$30,000	$21,475.00	$30,000	$30,000	29,412	$30,000	$27,663
GRID	Total proposed budget				$3,245,320	$4,369,445	$5,998,364	$2,187,974.00	$10,393,782	$2,691,261		$12,837,364	
PG&E		$3,350,000	1,290,000		$3,200,000		$4,250,000	$560,000.00	$7,530,000	$2,520,000	$2,970,000		
SCE						$5,600,194						$7,213,010	
SCG		$6,933,100	$129,600	$5,016,800		$11,977,300		$171,800.00			$6,794,924	$7,315,300	
Commissioner's Proposed Total Community Budget		$3,411,792	$993,600	$10,033,408	$3,200,000	$6,085,605	$7,590,000	$171,800.00	$9,000,000	$2,520,000	$2,970,000	$6,300,000	$52,276,205

Source: These estimates derived from September 10, 2018 Updated GRID/IOU Proposed Pilot Projects. For GRID, the budgets presented rest on their proposed costs for low-income fuel-switchers only. PG&E per household estimates were calculated based on total requested budget and proposed households to treat; for communities where PG&E assumed a household co-pay, this assumed co-pay was added to their calculated total budget.

(END OF ATTACHMENT A)