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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Southern California Edison
Company (U 338-E) for Approval of its Energy
Savings Assistance and California Alternate
Rates for Energy Programs and Budgets for
Program Years 2015-2017.

Application 14-11-007
(Filed November 18, 2014)

And Related Matters.

Application 14-11-009
Application 14-11-010
Application 14-11-011

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M) MARKETING AND
OUTREACH PLAN FOR LOW INCOME PER DECISION 16-11-022**

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ATTACHMENT A



Pacific Gas and Electric Company

Marketing and Outreach Plan for California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Programs for Low Income Customers Per D.16-11-022

July 21, 2017

MARKETING AND OUTREACH PLAN FOR CARE AND ESA PROGRAMS

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CARE and ESA Marketing and Outreach Plan

Chapter 1

Executive Summary

1. Executive Summary

Low income customers represent a large portion of Pacific Gas and Electric Company's (PG&E or the Company) market with over 1.5 million customers and provide a significant opportunity and responsibility for PG&E to continue to support them with financial assistance programs. The economic burden on these customers, including the impact of energy costs, often contributes to an emotional response of anxiety or fear. PG&E's Marketing and Outreach (M&O) Plan seeks to engage customers in opportunities to reduce their bills, primarily through the California Alternate Rates for Energy (CARE) Program. PG&E is equally committed to ensuring that eligible customers can receive the benefits of the Energy Savings Assistance (ESA) Program resulting in improvements to health, comfort and safety.

Through a sustained effort over many years, PG&E has successfully achieved high awareness and participation rates for both the CARE and ESA programs with 88 percent CARE penetration rate for all eligible and willing low income customers and 1,965,458¹ homes treated by the ESA Program. PG&E has achieved these results through ongoing targeted M&O campaigns which have continued to evolve based on lessons learned. PG&E has completed analysis on customers considered to be hard-to-reach; including those who experience high poverty, live in rural areas and/or rent. PG&E has concluded that the majority of these customers is participating or has participated in the CARE and ESA programs. This data suggests that PG&E's current marketing strategies including rigorous modeling, targeted multi-channel, multi-touch campaigns, and grass roots community-based outreach are successful and should be continued. PG&E also recognizes that there are hard-to-reach populations who may have not received or responded to outreach communications, and we plan to conduct further analysis to understand enrollment barriers and if necessary, modify outreach tactics.

¹ PG&E ESA/CARE 2016 Annual Report filed with California Public Utilities Commission (CPUC or Commission) on May 1, 2017.

PG&E acknowledges that moving forward it will be more difficult to convert the remaining eligible population of low income customers for a variety of reasons including barriers to understanding the programs, fear of providing income documentation, and the stress of daily struggles among other impediments. To address these challenges, PG&E will apply a two-fold strategy to acquiring the remaining income qualified customers:

- 1) Continue to use methods that have accomplished current high awareness and increased acquisition levels
- 2) Evolve elements of our messaging and outreach to speak more specifically to the remaining individuals and the nuanced barriers they are experiencing.

PG&E will also increase focus on driving awareness of overall energy management with the goal of moving low income customers to a more engaged state with their energy use over the next few years. As a result of the CPUC's Residential Rate Reform Decision (D.15-07-001, and subsequent Decisions), many low income customers are expected to be defaulted to a Time-of-Use rate plan, requiring energy reductions for some customers during peak energy periods to ensure customers don't experience cost increases.

In addition, the ESA Program will begin to move from a "homes treated" program to a focus on energy savings. PG&E will design ESA to provide long-term reductions in energy consumption while continuing to address health, safety, and comfort. The program includes new measures to help drive Energy Efficiency (EE) as well as engage customers in enhanced energy education to support overall improved energy behaviors.

It may be difficult for many low income customers to adapt their current energy behaviors. We know that fewer than half of low income households (43 percent) say they consistently follow basic energy conservation practices² and more than half of households say that they could not heat or cool their homes any less without impacting their households negatively.³ However, given that customers who participate in the CARE and ESA programs are more engaged and satisfied with PG&E overall,⁴ PG&E has the opportunity to use this positive customer relationship as a catalyst for additional

² ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

³ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

⁴ PG&E CARE & ESA Program Customer Energy Solutions Composite (Customer Satisfaction) Study, 2016 Q4.

engagement with energy management by serving up helpful tips, tools and education at relevant points in their customer journey. PG&E's marketing department is continuously focused on driving cost efficiencies as evidenced by its continuous focus on measurement of marketing tactics; testing of new marketing strategies and incorporation of lessons learned from successful marketing programs to date. PG&E continues to collaborate across the company to capitalize on integrated marketing opportunities critical to driving a positive customer experience and managing overall marketing costs. Coordination with regulatory proceedings such as EE, Demand Response, Distributed Generation, Residential Rate Reform, Energy Management Technologies (EMT), San Joaquin Disadvantaged Communities, and Statewide Marketing Education and Outreach will require planning due to the dynamic nature of the regulatory environment and will provide a significant opportunity to support PG&E's low income customers with holistic energy management approaches.

The plan presented in this document describes PG&E's approach for the CARE and ESA programs for low income customers in compliance with D.16-11-022.⁵ PG&E developed this plan utilizing the feedback and recommendations from attendees who participated in the M&O webinar and workshop held on April 21 and May 23, 2017, and looks forward to ongoing collaboration with stakeholders.

⁵ D.16-11-022, Decision on Large Investor-Owned Utilities' CARE and ESA Program Applications.

CARE and ESA Marketing and Outreach Plan

Chapter 2

Program Background

2. Program Background

2.1 Low Income Program and Strategies

2.1.1 Low Income Customer and Goals

PG&E's goal is to enlist as many income qualified customers as possible to participate in low income programs. PG&E has created a M&O strategy utilizing customer journeys to help empower low income customers to better manage and reduce their energy use with the ultimate goal of lowering their energy costs. This is not something that can happen overnight. Energy management concepts can sometimes seem overwhelming and the most successful outcome requires not just participation in the programs but sustained behavioral change. This is further complicated by the fact that many low income customers are time-strapped and stressed on a daily basis. Information needs to be fed in digestible pieces and repeated frequently as a reminder to act to provide the biggest impact. Different barriers need to be addressed for different customers. A thoughtful and deliberate strategy needs to be applied so that low income customers:

- Are more informed about the breadth of PG&E's assistance programs;
- Better understand their energy choices and how to reduce their energy use;
- Better equipped with the tools to choose the best energy products to fit their household needs; and
- Receive assistance when they need it.

PG&E wants to ensure all customers are able to engage in smart energy choices regardless of income or financial status. This goal is supported through PG&E's efforts in collaborating with an ecosystem of stakeholders, all working together on behalf of customers. This ecosystem includes consumer advocates, elected officials, government institutions and community partners that include Community-Based Organizations (CBOs).

Two of PG&E's signature low income programs are CARE and ESA. PG&E currently serves more than 1.5 million CARE customers and 90,000 households treated

by ESA each year.⁶ CARE and ESA are well recognized programs among low income customers and have a broad reach across the low income customer base.

2.1.2 History

PG&E has demonstrated an ongoing commitment to low income customers through the success of CARE and ESA. These programs offer customers the opportunity to save on their PG&E bill via a discounted rate and EE efforts, including weatherizing their homes to reduce energy use and increase health, comfort and safety.

Through the ESA Program (established in 1983 and formally known as the Low Income Energy Efficiency Program), PG&E has treated approximately 1,965,458 homes.⁷ ESA maintains a healthy customer satisfaction rate of 84 percent among PG&E customers.⁸

Additionally, in 1989, PG&E began administering the CARE Program and has offered more than \$8.1 billion in support to our CARE customers by providing a discount on their monthly bills. The CARE Program maintains a healthy customer satisfaction rate of 93 percent.⁹

Looking to the future, these programs remain foundational to the services PG&E offers to low income customers. PG&E will continue investing in the CARE and ESA programs and leverage them as introductory points in the customer journey to drive engagement in other relevant energy management and assistance programs (i.e., financial assistance programs such as Family Energy Rate Assistance (FERA), Relief for Energy Assistance through Community Help (REACH) and Low Income Home Energy Assistance Program (LIHEAP), Home Energy Checkup, rate tools and comparisons to assist customers in choosing the best rate for them).

2.1.3 Low Income Strategies

PG&E plans to implement the following low income strategies over the next four years:

⁶ PG&E ESA/CARE 2016 Annual Report filed with CPUC on May 1, 2017.

⁷ PG&E ESA/CARE 2016 Annual Report filed with CPUC on May 1, 2017.

⁸ Q4 2016 results from PG&E Customer Energy Solutions Composite Survey, released February 2017.

⁹ Q4 2016 results from PG&E Customer Energy Solutions Composite Survey, released February 2017.

- **Strengthen community partnerships in order to expand outreach to diverse and hard-to-reach communities.**

PG&E builds intentional and authentic community partnerships and cultivates these relationships based on mutual respect, understanding and exchange of ideas. These partners already serve their communities across the spectrum of social services and have a deep understanding of the needs of their low income clients. They work diligently to build trust and respect within their communities and are often a critical entry point of outreach to customers who may not respond to, or access PG&E's traditional marketing efforts. PG&E engages these community partners (e.g., Community Outreach Contractors, LifeLine,¹⁰ Cooling Centers, REACH and LIHEAP providers) through education, information, and tools to assist them with their community outreach.

- **Focus on an overall customer journey to include a customer experience with the highest satisfaction, ease of enrollment, and effective engagement programs that meet PG&E's low income customer needs.**

PG&E will continue to invite customer participation in programs through quick and easy opportunities to maximize customer enrollment and acquisition. PG&E supports customers by providing multiple methods for our low income customers to enroll in programs: mail applications, email, online (desktop and mobile), contact center, and via community partners.¹¹ Once enrolled in programs, customers can receive timely newsletters with energy savings tips and other helpful information. Additionally, customers are sent reminder letters when it's time to recertify for the CARE Program.

- **Provide multiple opportunities for low income customer engagement and service through channel of choice.**

PG&E optimizes program support through targeted outreach and messaging to customers based on their demographics and interests. Tailored

¹⁰ LifeLine coordination and administration is under internal Commission review with the Communications Division and the Energy Division. All efforts for LifeLine coordination have been put on hold until parties are informed of CD's direction. (Official transcript from Pre-Hearing Conference on ESA/CARE Budgets and Programs, 2015-2017, June 22, 2017).

¹¹ PG&E's 2017 Community Partners. https://www.pge.com/includes/docs/pdfs/myhome/customerservice/financialassistance/care/education/COC_Enhanced_Info_List.pdf.

messages are provided in multiple languages and through several channels. Additionally, customer-facing employees, such as Contact Center and Local Office representatives are regularly trained on program requirements, eligibility and acquisition. These employees are solutions-oriented and work to provide the best service to customers.

PG&E leverages an extensive network of CBOs, small businesses and third-party partners to inform customers of programs and deliver critical services. PG&E is in constant contact with these partners to keep them up-to-date on program changes and customer resolutions. Community partners offer culturally relevant services often in a customer's native language and are sensitive to cultural nuances to help maximize a customer's experience.

- **Align low income programs with Residential Rate Reform changes, to provide customers with the most up-to-date information and assist them in navigating rate changes and affordability concerns.**

Residential electric rates are changing in California and for some low income customers this could mean an increase in their bills and an added energy burden. PG&E is focused on outreach that includes ways to help low income customers navigate these changes and mitigate potential increases to the energy statements. Through marketing initiatives, ESA contractors, and community networks, PG&E provides customers with information and tools about their energy management. By doing this, low income customers can exercise more choice and control over their energy usage. As part of PG&E's ongoing strategy to support customers with information on other available Demand-Side Management (DSM) programs such as SmartAC™, PG&E has developed customer energy usage profiles. Based on those profiles, customers are provided with information on other possible DSM programs. These profile assessments will enable them to enroll in other energy savings programs as appropriate.¹²

¹² Decision on end-use energy usage profiles and how Investor-Owned Utilities (IOU) will support a consistent approach across the state is still pending per the Pre-Hearing Conference transcript on June 22, 2017.

- **Equip low income customers to make energy choices that better fit their families, through energy education, energy savings tips, and awareness of energy management tools.**

PG&E is committed to coordinating internally to align strategies and campaigns across the low income and residential rates proceedings in order to offer an integrated and comprehensive experience to our low income customers. Under the ESA Program, third-party partners, referred to as Energy Specialists, engage customers in their homes by providing energy education focused on explaining the benefits of ESA, as well as verifying and enrolling the customer in the program. During this visit, ESA Energy Specialists also build and enhance customer awareness and understanding around:

- Their energy statement, usage patterns, and how energy saving practices can positively impact their energy bill; and
- Other utility programs such as CARE and Medical Baseline.¹³

With the introduction of enhanced energy education later in 2017, the Energy Specialist will also:

- Ensure the customer is enrolled in PG&E's online account, as well as Bill Forecast Alert and High Use Alerts (if applicable) using the customer's online device of choice with the option to opt-out;
 - Develop the customer's knowledge regarding their energy use by demonstrating PG&E's rate analysis tool to determine if the customer is on an appropriate rate; and
 - Explore opportunities to reduce costs via PG&E's EE and Demand Response programs.
- **Promote self-empowered customers by providing targeted tools through mobile, online, and community resources.**

PG&E has expanded its self-service channels, online tools, and in-language support to promote a customer's ongoing choice and control around energy. Tools such as Home Energy Checkup, online rate comparisons, and quick access to other financial assistance programs are easy to find online. In addition, forms and documents are available in multiple languages. For

¹³ PG&E program to increase energy allowance and reduce energy bills for customers with ongoing medical conditions and/or life support equipment that effect energy use.

customers who prefer to access a network of community organizations for an in-person experience, PG&E partners with a number of organizations who employ culturally-competent, multi-lingual staff. Through the host of options, customers can better understand and monitor their own behavior to make the right energy choice, at the right time, when needed.

2.1.4 Low Income Key Initiatives – 2020

There are a number of critical changes under consideration for the CARE and ESA programs, spanning multiple proceedings. Changes include restructuring the CARE Program and ESA transitioning to energy savings goals versus energy savings targets. Although many of these changes are in early stages of development, it is possible these changes will impact program objectives, structure, delivery, marketing, and outreach. Planning and timelines for these projects are still in flux and will evolve over time. PG&E has outlined a few critical initiatives that are underway and has provided a 'best guess' timeline of how these projects may unfold over the next four years in the table below:

**TABLE 2-1
CARE AND ESA PROGRAMS –KEY INITIATIVES**

Initiative	Program	2017	2018	2019	2020
CARE Restructuring	CARE	Perform data collection on current CARE customers; Identify possible options for changes to CARE Program: Test options for feasibility and success	Stakeholders review options and select best proposal	Implementation To Be Determined (TBD)	Implementation TBD
Transition to Energy Savings Goals	ESA	Introduction of new measures, including Light-Emitting Diode (LED) lamps and fixtures, Tier II power strips	Introduction of additional new measures, including; clothes washers and second refrigerators	Potential changes to program structure, program rules, measure offering by climate zone/energy use/etc. to optimize portfolio; to be defined in the Mid-cycle Update Advice Letter filed in 2018	Refinement of changes introduced in 2019 from Mid-cycle Update Advice Letter
Multifamily (MF) Single Point of Contact (SPOC)	ESA	Launch SPOC: Covering ESA, MF EE, On-Bill Financing (OBF)	Refine SPOC based on data collected	Potential changes based on findings in 2017 and 2018; to be included in Mid-cycle Update Advice Letter filed in 2018	Refinement of changes introduced in 2019 from Mid-cycle Update Advice Letter
MF Common Area Measures	ESA	Launch ESA common area EE measures to MF buildings as defined in the Decision	Refine ESA common area measure offering based on data collected	Potential program changes based on findings in 2017 and 2018; to be included in Mid-cycle Update Advice Letter filed in 2018	Refinement of changes introduced in 2019 from Mid-cycle Update Advice Letter

**TABLE 2-1
CARE AND ESA PROGRAMS –KEY INITIATIVES
(CONTINUED)**

Initiative	Program	2017	2018	2019	2020
Tribal Communities	ESA	Create tribal plan (including defining federally-recognized tribes within PG&E's territory, tribal leader election cycle & term of leadership/key dates, population and location) and begin engagement with a few key accessible tribes to understand needs and culture informing engagement strategy along with program changes that may be required to support ESA adoption	Continue implementation of tribal plan and adjust engagement strategy based on data collected	Potential changes based on findings in 2017 and 2018; to be included in Mid-cycle Update Advice Letter filed in 2018	Refinement of changes introduced in 2019 from Mid-cycle Update Advice Letter
Enhanced Energy Education	ESA	Implement Enhanced Energy Education (including; online account enrollment, signup for Alerts, Residential Rate Reform tools and messaging)	Implement Time of Use (TOU) training as materials are developed under Rate Reform	Potential changes based on findings in 2017 and 2018; to be included in Mid-cycle Update Advice Letter filed in 2018	Refinement of changes introduced in 2019 from Mid-cycle Update Advice Letter

2.1.5 Risks and Challenges

Even with CARE and ESA's high customer satisfaction rates (93 percent and 84 percent respectively) and participation rates (approximately 88 percent and 73 percent, respectively), there are challenges to maintaining the success of these programs. PG&E has identified a few critical areas that require continued attention and focus over the next few years.

- **Community Engagement outreach and enrollment goals can be difficult to anticipate and measure.**

Although PG&E receives high praise for its commitment to community engagement and relationships with numerous community partners, PG&E cannot assume that energy education and program acquisition are a high priority for all partners. Many community organizations cover a wide range of social services including unemployment, housing, health, and education, and are often resource-constrained and may not be able to fully provide comprehensive energy resources to clients. This can lead to inconsistency in delivering energy messages, tracking impactful client touches, or receiving credit for leading a customer to an actual enrollment. Understanding this, PG&E is committed to helping community partners support client awareness, education and action by providing simple, easy to understand training, in-language outreach, and clear communication tools.

- **Transitioning ESA to energy savings goals introduces uncertainty as changes to program structure and offerings have yet TBD.**

PG&E is fully committed to move to energy savings goals in 2019 as directed in the Decision. The transition from homes treated as the key metric to energy savings has the potential to remove current measures as well as introduce new measures to the ESA Program. It also may change how customers are targeted, the specific measures available to them based on climate zone or energy use, as well as the tools and data ESA contractors will need to utilize to those determinations.

- **Increasingly difficult to identify and enroll new, hard-to-reach customers who may be eligible for CARE and ESA programs.**

PG&E is utilizing insights from data research, customer focus groups, and community engagement to better understand how to engage hard-to-reach customers in hopes of increasing participation rates.

High penetration rates within the CARE Program make it difficult to locate eligible customers who may not be reached by conventional marketing methods. While CARE is a well-known, highly subscribed program, there still remain a small percentage of unenrolled, eligible customers. PG&E acknowledges that some of these customers are not willing to participate and may never enroll, but PG&E will continue to address hard-to-reach barriers and outreach to as many eligible customers as possible. Continued outreach to these customers takes creative strategies (i.e., community partnerships, door-to-door outreach, in-person enrollment) and often come at a higher price.

As PG&E approaches meeting the 2020 ESA Program goal of serving 100 percent of all eligible and willing low income customers by 2020, the population of eligible customers is decreasing and will require evaluation and enhancement of current education and outreach approaches. Customer groups such as those living in MF buildings, and limited English speakers have lower participation rates than other groups. There is also growing concern that customers who may be afraid of political or government backlash based on their citizenship/immigrant status are purposefully avoiding program participation to protect their identities.

2.2 CARE Program

2.2.1 Overview

The CARE Program provides a monthly discount on energy bills to low income households with incomes at or below 200 percent of the Federal Poverty Guideline. Eligible customers can live in the following types of housing: residential single-family households, tenants of sub-metered residential facilities, nonprofit group living facilities, agricultural employee housing facilities and migrant farm worker housing centers

throughout PG&E's service area. Qualified customers are also eligible to receive a CARE discount if they participate in certain categorical programs.¹⁴

Customers apply for the program through various channels including mail, phone, fax, online, text and CBOs. To maintain quality control within the program, once enrolled, customers may be selected for Post-Enrollment Verification (PEV)¹⁵ based on the following methods:

- 1) CARE probability model¹⁶
- 2) Customers who exhibit high energy usage or
- 3) Random sample throughout the entire CARE population

Enrolled customers are also required to re-apply (recertify) every two or four years to continue receiving monthly discounts.

In recent years, PG&E's targeted CARE penetration rates have reached historic levels (88 percent) and are nearing the CPUC's aspirational goal of 90 percent penetration. PG&E plans to increase its CARE penetration to 90 percent by 2020 to ensure that all eligible and willing income qualified customers claim their discount to lower their bills and make energy more affordable.

Looking towards the future, CARE stakeholders are currently exploring the possibility of a program restructure by 2020. Interested parties are gathering data on the current program and will use that data to discuss potential restructure options. There is no consensus on what form CARE may take down the line, but depending on what comes from this CPUC-mandated exploration, customers could see noticeable changes in future CARE Program administration and marketing.

¹⁴ A Categorical Program is a public assistance program with similar eligibility criteria as CARE and ESA. If a customer is enrolled in one of these specific programs, they are qualified for CARE and ESA enrollment. Please see Appendix 1 for CARE enrollment application.

¹⁵ PEV process - https://www.pge.com/en_US/residential/save-energy-money/help-paying-your-bill/longer-term-assistance/care/post-enrollment-verification/care-program-main.page

¹⁶ An algorithm designed to assess likelihood for CARE based on select demographics and characteristics.

2.2.2 Goals and Objectives

PG&E plans to reach at least a 90 percent CARE program penetration rate for all eligible and willing low income customers by 2020.

**TABLE 2-2
PROGRAM YEAR (PY) 2017 – 2020 CARE ESTIMATED PARTICIPATION**

	Total Enrolled 12-31-16	PY 2017 Estimated Eligible	Estimated Net PY 2017 Enrollments	Estimated Year End PY 2017 Participation	Estimated PY 2017 Goal Rate	Estimated PY 2018 Net Enrollments	Estimated Year End PY 2018 Participation	Estimated PY 2018 Goal Rate (a)	Estimated PY 2019 Net Enrollments	Estimated Year End PY 2019 Participation	Estimated PY 2019 Goal Rate (a)	Estimated PY 2020 Net Enrollments	Estimated Year End PY 2020 Participation	Estimated PY 2020 Goal Rate (a)
(Source)	(1)	(2)	(3)	(Col. B+D)	(Col. E/C)	(2)	(Col. E+G)	(Col. H/C)	(2)	(Col. H+J)	(Col. K/C)	(2)	(Col. K+M)	(Col. N/C)
	1,423,324	1,588,016	-10,000	1,413,324	89%	16,000	1,429,324	90%	16,000	1,445,324	91%	16,000	1,461,324	92%

(a) Estimated PY2018, PY2019 and PY2020 Goal Rate will fluctuate based on updated CARE-eligibility information to be filed February 2018, February 2019 and February 2020.

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- (1) CARE Monthly Reports, dated January 20, 2017.
- (2) Each utility's estimate based on eligibility rates filed.
- (3) Most recent estimates of net enrollments.

For 2017 to 2020, PGE's CARE goals are to provide monthly discount to targeted eligible customers; develop and implement program changes as directed by the Decision and develop and implement CARE Program changes as directed by Residential Rate Reform.

2.2.3 Participation Rates and Gap

By year-end 2016, PG&E enrolled over 1.4 million customers into the CARE program. This is equal to an 88 percent penetration rate of the total estimated eligible customers and over \$8.1 billion in cumulative discount to CARE customers. In order to reach 90 percent, there are still approximately 32,000 eligible customers who have not enrolled in the program. PG&E has outlined a number of initiatives below to try to reach these remaining customers

2.2.4 CARE Initiatives

In order to reach the 90 percent aspirational CARE goal, PG&E plans to focus efforts on a number of initiatives through to 2020:

1) Continue to Acquire Enrollments Through Proven Marketing Channels

PG&E employs a range of marketing channels to inform customers of the CARE Program to encourage willing and eligible customers to enroll in the program. PG&E utilizes a 'propensity model' to determine customers with the highest probability for CARE-eligibility based on demographic factors. These customers are placed on an outreach list and receive the appropriate CARE marketing, often based on their channel preferences. On average, PG&E's acquires 96,000 new or previously enrolled CARE enrollments each year.

2) Maintain Annual Recertification Rate at 82 Percent

The CARE Program guidelines stipulate each customer must recertify for the program every two to four years with an average of 435,000 customers needing to recertify each year. For many customers, this is an easy and straightforward process, requiring little time and effort.

However, there are some customers who did not understand the recertification process or did not reply and were subsequently removed from the CARE Program. To reduce the number of eligible customers at risk of being removed from the program due to recertification, PG&E simplified the process and now provides customers with multiple messages in advance of their recertification deadline. Furthermore, PG&E now automatically renews customers who are most likely to still be eligible for the CARE Program based on the results of their probability algorithm. This process innovation has led to a 45 percent auto-renewal rate, among PG&E's most likely CARE-eligible

customers and significantly reduced the number of customers removed for failing to recertify. It also delivers business benefit in reducing staff time and operational costs needed to recertify these customers. Given these successes, PG&E will continue these initiatives through to 2020.

3) Keep PEV Incomplete Responses at or Below 16 Percent

Similar to recertification, there are some customers who may have challenges understanding or responding to the PEV process after they are enrolled in the program. This process can be somewhat daunting for some customers who may need to provide proof of income or demonstrate eligibility in certain social service programs.

As with recertification, PG&E has worked to streamline and simplify the process and provides multiple support materials to assist customers. PG&E also initiated a Community Ambassador Program to identify the highest counties who fail to respond to the PEV process and partners with live employees at local CBO's to make follow-up calls to customers to ensure they have received and understand all written PEV material. This additional step, from a trusted member of the community, has increased the PEV response rate by 21 percent in these targeted counties.¹⁷ PG&E plans to continue building this initiative out to other counties with lower than average PEV response rates.

4) Strengthen Community Partnerships to Provide Energy Information, Education and Enrollment Opportunities to Hard-To-Reach Customers

PG&E has a history of working with CBOs to support CARE enrollment. The Community Outreach Contractors Program enlists 70 organizations throughout the service territory, who help identify and enroll customers into the CARE Program.

Historically, this has been a successful program, but as CARE penetration rates increase, it has become increasingly difficult for community partners to locate eligible customers who are not already on the program. Community partners have reported they are spending their limited time and resources on outreach methods with little to no new customer yield and they have expressed a desire to evolve the Community Outreach Contractor Program. In response,

¹⁷ Community Ambassador Survey Results from Alameda and Yolo counties, June 2017.

PG&E has begun supporting community partners to engage the low income customers they serve on opportunities for energy literacy, awareness, and education. Community partners also recognize that energy costs are changing and they, too, want to help prepare their low income clients as much as they can. Therefore, PG&E has deepened its relationships with community partners across sectors like community health, education, and housing to bring energy management closer to their communities. Through targeted training modules and curriculum, these community partners are knowledgeable and better equipped to hold conversations with their clients and share tips and tools about savings and energy assistance.

2.3 Energy Saving Assistance (ESA) Program

2.3.1 Overview

PG&E has offered free EE programs to income qualified customers across the 48 counties served since 1983. As part of PG&E's comprehensive low income programs and strategy, the ESA Program helps these customers reduce energy consumption and costs while increasing health, comfort and safety. The program provides home weatherization, energy efficient products and appliances and energy education services to income qualified customers. In order to meet the tenets of this program, PG&E plans to treat an additional 388,041 homes by 2020.¹⁸ PG&E offers the ESA Program to all willing and eligible customers and invites them to participate. The ESA Program has treated approximately 1.9 million homes from 1983 through 2016.

2.3.1.1 Customer Eligibility

The ESA Program is available to PG&E income qualified customers living in all housing types (single family, multifamily, and mobile homes), regardless of whether they are homeowners or renters. Similar to CARE, the ESA Program requires the total customer household income to be equal to or less than 200 percent of the Federal Poverty Guidelines, with income adjustments for family size.

¹⁸ D.16-11-022, p. 279.

2.3.1.2 California Strategic Plan 2020

The California Strategic Plan defines both a vision and a goal for the ESA Program in serving income qualified customers: The vision states that by 2020, 100 percent of eligible and willing customers will have received all cost effective EE MF program portfolio.¹⁹ The goal is for all eligible customers to be given the opportunity to participate in the Low Income Energy Efficiency Program by 2020.²⁰ In order to provide all eligible customers the opportunity to participate in the ESA Program, PG&E is employing the following strategies:

- **Increase local presence** – PG&E’s ESA contractors hire and train most energy specialists and weatherization experts from the local communities in which they will be working. Hiring locally grows a workforce that is accustomed to the specific nuances of the communities in which they work. These ESA Program field personnel bring their local and in-language knowledge to help recruit participants from the communities in which they live and work. PG&E is also working closely with implementation contractors to ensure that direct lines of in-language contact are provided to better facilitate scheduling with customers while also deepening the learning experience in customers’ homes during energy education.
- **Improve customer outreach** –PG&E employs multi-touch, multi-channel customer acquisition campaigns, targeting customers with a high propensity for eligibility. Also, in compliance with the recent Decision,²¹ PG&E has improved consistency and uniformity in ESA Program leads provided to ESA Program outreach contractors.

PG&E is also employing strategies to help ensure that program delivery continues to be cost effective and provides customers with increased energy savings which include:

¹⁹ California Energy Efficiency Plan, January 2011 Update, ["http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=5303"](http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=5303), Section 2.2.1, “Vision,” p. 3.

²⁰ California Energy Efficiency Plan, January 2011 Update, ["http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=5303"](http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=5303), Section 1.4 Strategic Planning Process, p. 6.

²¹ D.16-11-022, Ordering Paragraphs (OP) 109 and 110.

- **Increased collaboration and leveraging of other low income programs and services** – To broaden the program’s enrollment impact, our outreach team builds relationships with and leverages various community organizations’ programs that already offer low income social services. As a result of collaborating with trusted local organizations, customers can receive a more comprehensive service tailored to their needs. This increases the likelihood of customers completing enrollment forms is increased. For example, since PG&E provides financial and information support to local government-operated Cooling Centers, we can leverage promotion of the CARE and ESA programs in the centers to drive enrollment. Also, as part of the Residential Rate Reform education campaign efforts, the CARE and ESA programs partner with CBOs and other PG&E programs in strategic community events across PG&E’s service area. For example, PG&E partnered with eleven CBOs in 2016 to raise awareness on residential rate reform and how CARE and ESA programs are helpful financial and energy assistance program.
- **Provide seamless service offerings to customers** – M&O for low income programs is implemented by PG&E’s Community Engagement and Solutions Marketing teams, allowing better integration of messaging and customer education. For example, ESA direct mail campaigns containing information about the ESA Program offerings and application integrates Residential Rate Reform messaging. The ESA Program is also featured in PG&E’s Home Energy Reports, as well as monthly digital residential newsletter targeting low income customers. PG&E’s integrated brochure was updated to include residential rate information (specifically “Choose the best rate plan for you”) and is leveraged in outreach through CBOs in all of our programs and initiatives, including outreach through CARE Community Outreach Contractors, Health Outreach Workers, Energenius and through community events attended by local offices.
- **Provide customers with EE measures resulting in greatest savings** – PG&E continues to assess and evaluate opportunities to incorporate new EE measures into the ESA Program. New measures introduced in 2017 include Light-Emitting Diode (LED) lamps, LED fixtures, and tier II power strips.

- **Identify customer segments to increase delivery of programs** – PG&E uses detailed customer data to focus marketing investment among customers with the highest propensity to participate, and lowering marketing costs.

2.3.2 ESA Homes Treated Goals

The homes treated goal for the ESA Program for years 2017 to 2020 is directed by the D.16-11-022.²² See table below for homes treated goals by year.

**TABLE 2-3
ESA PROGRAM HOMES TREATED GOALS BY YEAR**

	2017	2018	2019	2020	Total
Homes treated	90,030	94,532	99,258	104,221	388,041

The annual homes treated goal is comprised of both first time (ESA 2020) customers and retreatment (“go-back”) customers. As directed by the Decision, PG&E is prioritizing households that have not yet been treated by the program (ESA 2020), households in areas where the program participation rates are below the average for the IOU’s service territory, as well as CARE high energy users. PG&E is on target to meet the ESA 2020 goal of serving one hundred percent of all eligible and willing low income customers by 2020. The ESA Program home treatment estimates by first time and retreatment customers are detailed in the table below.

**TABLE 2-4
ESA PROGRAM HOME TREATMENT ESTIMATES**

	2017	2018	2019	2020	Total
First Time (ESA 2020)	63,021	47,266	44,666	23,609	178,562
Retreatments (Go-Back)	27,009	47,266	54,592	80,612	209,479
Homes Treated	90,030	94,532	99,258	104,221	388,041

²² D.16-11-022, Section 3.19.2, p. 278.

PG&E estimates its ESA 2020 goal to be 178,562.²³ This estimate, based on the methodology approved by the Commission, takes into account the number of eligible low income customers minus the number of ESA Program and Community Services and Development (CSD) treated customers since 2002, with the Willing and Feasible to Participate factor of 60 percent applied. PG&E is expected to treat this number of ESA-eligible households as opposed to solely approach these households for participation.

It is important to note that the program home treatments detailed in the table above are estimates. PG&E will serve all customers requesting treatment (first time or retreatment) if they qualify for the ESA Program. The first time treatment and retreatment estimates are to be used by PG&E's implementer and ESA contractors to prioritize customer outreach efforts and to adjust outreach efforts accordingly to align with these estimates. PG&E's ESA Program home treatment estimates balances the need to achieve the 2020 goal with the removal of the Go-Back Rule and Decision's directive to prioritize first time ESA customer treatments.

2.3.2.1 ESA Disabled Enrollments Goal

PG&E has consistently met or exceeded the 15 percent enrollment goal for households containing a person with a disability for the last five years and is focused on maintaining or exceeding the 15 percent minimum enrollment goal annually through 2020. Households may be identified based on enrollment in the Medical Baseline Program, the visibility of an observed disability by the ESA contractor, and/or the customer's self-identification. To assist in meeting this goal, PG&E will collaborate with the Center for Accessible Technology (CforAT) to understand methods to support the voluntary self-identification on enrollment forms. Additionally, PG&E will look into how its database can accommodate better identification of households containing a person with a disability, so as to draw on this information to support any other efforts it makes to ensure that its services are accessible to people with disabilities. PG&E will continue to report in the CARE and ESA Annual Report its success at meeting the 15 percent enrollment goal, including discussion of any outreach approaches introduced or retired. Lastly, PG&E will ensure accessible versions of key communications with printed

²³ PG&E Advice Letter 3831-G-A/5043-E-A Partial Supplement – Low Income Programs Conforming Advice Letter Pursuant to D.16-11-022, p. 3, June 20, 2017.

materials from outreach to enrollment to education made available in large print, braille, electronic, and audio formats.

2.3.3 ESA Customer Population Segments

There are two types of ESA customers, first time customers and retreatment customers:

2.3.3.1 First Time (ESA 2020)

An ESA 2020 customer is a customer who lives in a household that has not yet participated in the ESA Program or has not participated since 2002. ESA 2020 customers have been identified as customers to prioritize in the recent Decision.

2.3.3.2 Retreatments (Go-Back Program)

The Decision eliminated the Go-Back Rule, which removes the “freeze” on re-treating households since 2002. A retreatment or go-back customer is a customer who lives in a household that has participated in the ESA Program after January 1, 2002. Retreatment customers are subject to the same eligibility guidelines mentioned in the Eligibility Section 2.3.1.1. For 2017, PG&E’s target retreatment customer is a customer who meets the eligibility requirements for the ESA Program, is a CARE high energy user, and was treated prior to January 1, 2013. PG&E will evaluate the target retreatment customer on an on-going basis and will modify as needed.

While the retreatment of ESA customers is now permitted, “the IOUs are currently required to first seek out and prioritize new households that have not yet been treated by the ESA Program.”²⁴

2.3.4 Program Description

The ESA Program is committed to installing EE measures with the goal of reducing energy hardships while helping customers meet their health, safety, and comfort needs. Eligible customers may be able to receive:

- **Enhanced Energy Education/Home Assessment.** Customers who participate in the ESA Program are currently provided with energy education that informs them on programs and services offered by PG&E. In addition, energy education provides customers with insight on how to read their energy statements and how energy saving practices can positively impact their energy

²⁴ D.16-11-022, Section 3.3, “Go-Back Rule/Re-Treatment off Households” p. 54.

bill by reducing their energy usage. Enhanced Energy Education, to be introduced in 2017, will expand to integrate Residential Rate Reform tools. The focus of this educational campaign will be rate reform tools and other energy saving tips and will include assisting customers with logging into their account to utilize the bill management tools offered online, including reading their energy statement, usage patterns, signing up for Bill Alerts and Energy Alerts, and comparing the different rate plans offered for best rate. Customers will be educated on other energy savings rebate programs offered through PG&E, state and local programs such as the Lifeline Program, Covered California, Women, Infants, and Children (WIC) Supplemental Nutrition Program among others. See Section 2.1.3 Low Income Strategies for more information about how the ESA Program builds awareness to reduce energy costs for our customers. PG&E is focused on the integration of messaging to better assist our customers in their energy use.

Training and preparing ESA contractors to educate our customers is key. PG&E recognizes that we need to be flexible, efficient and find cost saving approaches to meet the needs of the ESA contractors. With this in mind, PG&E will begin by utilizing an On Demand platform training for “Pre Training” of the Energy Specialist that will contain knowledge checks throughout that must be passed before moving on to classroom training. This On Demand training will consist of non-technical information such as water conservation, heating and cooling system operation, intro to ESA and other money saving programs offered through state and local agencies. This platform will also be utilized for ongoing refresher training when needed on the following subjects:

- Natural Gas Appliance Safety Test
- EE measures that may include insulation and weatherproofing
- Replacement of old refrigerator
- Auto-enrollment in CARE for a monthly discount on energy bill
- **Repair and/or replacement of inoperable or unsafe furnace and/or water heater through Repair and Replacement Program.** To qualify for the Repair and Replacement Program, the customer must participate in the ESA Program. Of the customers receiving services through the ESA Program each year, approximately 7,000 customers receive repair and replacement services.

- **Air conditioner tune-up services through the Air Conditioner Tune-up Program.** Provides air conditioner tune-up services to customers participating in the ESA Program during the summer months. To qualify, the customer must live in a climate zones approved for Air Conditioner Tune-Up and have a central air conditioner or package unit that is in working condition. This program is available to renters and homeowners.

2.3.5 ESA Marketing and Outreach Priorities and Target Audiences

The ESA Program team is focused on reducing the energy burden and hardship for PG&E low income population by increasing collaboration with a variety of PG&E programs including rate assistance (CARE) and EE program initiatives.

Per the Decision, PG&E is implementing customer segmentation to prioritize customers using CARE enrollments as a driving targeting factor. To achieve targeted outreach, PG&E completed database enhancements to improve consistency and uniformity in ESA Program leads provided to ESA Program outreach staff, including ESA contractors. Customers identified as priority are as follows:

- New CARE customers;
- CARE customers with high energy usage above 400 percent baseline for electric;
- CARE customers with high energy usage above 200 percent for gas;
- CARE customers who recently moved;
- CARE customers who have completed the PEV process; and
- CARE customers on the program 6+ years.

In compliance with the Decision, the ESA Program is also focused on expanding outreach to Tribal communities throughout the service territory, as well as further engaging MF property owners to provide a “whole building” enrollment approach for both in-unit EE measures and common area measures.

2.3.5.1 Tribal Communities

PG&E is set to conduct a preliminary tribal consultation with federally-recognized tribal communities in its service territory by 2020. The assessment is to determine ESA Program eligibility and willingness to participate. In 2017, PG&E will create a tribal directory identifying and characterizing the federally-recognized tribes in its service area. The directory will include:

- The number of customer households on tribal lands
- PG&E gas and electricity service
- Housing type
- Enrollment in CARE
- Previous ESA participation

The directory will also include information on the local tribal structure, including current contacts.

This information will help PG&E to develop partnership priorities and an approach plan for providing ESA outreach and services. PG&E will focus on developing cultural targeting and engagement strategies, building relationships, and customizing energy education, and ESA Program services to tribal communities. PG&E is directed to assess all tribes by 2020, and to report its progress and partnership consultation and activities quarterly to the Low Income Oversight Board, and annually to the Commission.

2.3.5.2 Community Services and Development

The Decision directs the ESA program to coordinate and leverage efforts with low income EE programs administered by the California State Department of CSD. These CSD programs include the Low Income Weatherization Program (LIWP) for MF residents, the LIHEAP, and the Weatherization Assistance Program (WAP). PG&E and CSD are working together in 2017 to develop and implement leveraging and referral strategies.

2.3.5.3 Multifamily Sector

The ESA Program is continuing to target low income MF buildings for in-unit tenant treatment as well as implement new MF directives per the Decision. These new directives aim to facilitate greater engagement with building owners, allows the ESA Program to expand to provide for common area measures for deed-restricted MF buildings, and provide a “whole building” enrollment approach for both in-unit measures and common area measures.

It's through three key initiatives that PG&E will accomplish goals and directives of the Decision regarding the low income MF market. The goal of these initiatives is to reduce building owners' barriers to participation in EE, to better serve the energy needs

of California, and reduce the hardships on ESA-eligible households living in MF buildings.

- 1) The first initiative is a statewide whole building affidavit process. Depending on the percentage of income qualified tenants and building ownership (deed-restricted, government, or non-profit owned) the building may qualify for whole building enrollment thus removing the need for door-to-door income documentation: for buildings located in a designated low income geographical area and where 80 percent or more of the tenants qualify for ESA, the building is eligible for whole building program treatment of both the units and common areas. If at least 65 percent of the building's tenants qualify for ESA based on income guidelines, the building is eligible to receive common area measures only through this express affidavit path.²⁵ The Joint IOUs are creating a single statewide form in which building owners can self-certify tenants' income for all buildings in their portfolio and authorize participation in the ESA Program. In addition this same form will be used to cover other MF EE programs. The affidavit process provides building owners with an express path to treating all buildings in their portfolio through a simplified process.
- 2) The second initiative is the SPOC, in which an implementer will consult with building owners to encourage participation in ESA Programs for tenants, common area measures, and other qualifying MF EE programs to determine the best-fit and provide a seamless referral process. The SPOC will also provide education regarding OBF offerings and recommend financing options.²⁶ This initiative is on target to launch Q3 2017 and will be enhanced throughout the program cycle based upon knowledge gained from an iterative approach and key market players.
- 3) The third initiative, common area measures, provides comprehensive resources for qualifying buildings to address common area building systems to reduce energy use. The common area offering will be a sub-program within PG&E's MF offerings with its own measure mix specific to common areas and building systems with program policies and procedures tailored to the program's goals

²⁵ D.16-11-022, OP 46.

²⁶ D.16-11-022, OP 51.

of targeting the low income MF market through property owner engagement. PG&E's EE and ESA teams are collaborating very closely to leverage an existing, expert implementer in the MF space to incorporate this low income focused component to the existing Energy Efficiency Multifamily Program Portfolio. The SPOC and common area offerings will provide a "one-stop-shop" for property owners to achieve their MF energy goals, decreasing the challenges of navigating a space with many fragmented utility energy programs. To further connect with building owners and meet their unique needs, the program will engage heavily with housing coalitions and authorities to inform the design of future program phases. A couple of key ways the program will gain traction with property owners is by conducting outreach to MF properties that are listed on the State Treasurer's website and through participation in California's Tax Credit Allocation Committee noticed workshops where the program implementer will collaborate directly with building developers and owners to identify potential properties for treatment. This initiative is on target to launch late Q3 2017 and will be implemented in phases building upon insights gained from an iterative approach and collaboration with market experts

As the new SPOC and common area offerings develop, PG&E will continue to develop greater coordination amongst all programs between not just ESA in-unit and common area opportunities, but also EE and ESA MF programs at a statewide scale.

2.4 Cooling Centers

PG&E works with cities and local governments on locations that will open when the weather is hot to allow customers a place to cool down and provide shelter from extreme heat. This provides a critical option for the Seniors and others vulnerable to the heat because it can reduce the risks of heat-induced ailments as well as reduce the amount of time high energy use is needed to cool a residence.

The cities and local governments work directly with Cooling Centers to manage the opening and operations of the locations during summer months (the Cooling Center season generally runs each year from June 1 through October 15) when the daily temperature exceeds a temperature threshold. Many local governments in warm weather areas have already established Cooling Centers or have filed emergency plans with the Governor's Office of Emergency Services. Local governments who operate

existing Cooling Centers have familiarity with the needs of their respective populations and are able to identify optimal locations to increase effectiveness and use of the Cooling Centers.

PG&E's efforts include educating customers on heat preparedness and publicizing the center locations and accessibility. Customers are made aware of Cooling Center hours through local news broadcasts, social media sites hosted by news outlets and news websites. PG&E maintains an updated website with general Cooling Center operating hours and maps; however, since Cooling Centers are only open on specific days when the temperature threshold is met, PG&E encourages customers to check their local news outlets or municipalities before visiting a Cooling Center to ensure it is open. This 'temperature threshold' design creates some logistical challenges to execute, effective widespread marketing of Cooling Centers, because Cooling Center availability and hours can change with very little notice and at times, PG&E must await a city/municipality announcement that the Cooling Center is actually open with notice in as little as 24 hours ahead of time or less. Given that the locations that will open are determined on short notice, tactics with longer lead times, such as print and radio cannot be feasibly implemented to drive traffic to those locations. PG&E plans to promote the Cooling Centers with alerts on www.pge.com. PG&E also plans to utilize the low income digital newsletter and social media to inform customers that Cooling Centers are available during higher heat in the summer and encourage them to locate and go to a Cooling Center when they are open in their area. These efforts will drive to content that will show a list of Cooling Center locations for customers to visit.

PG&E will continue to provide financial and informational support to select local government-operated Cooling Centers for the purposes of increasing participation among low and fixed income residents. To participate in PG&E's Cooling Center Program, local governments must ensure a center provides the following:

- Free entrance to all visitors;
- Admission on a non-discriminatory basis;
- A center location that is easily accessible by public transportation or shuttle service;
- A safe and comfortable atmosphere;
- Seating areas;
- Complimentary water;

- Access for disabled persons;
- Established criteria that triggers the opening of the Cooling Center(s); and
- Brochures promoting other PG&E services such as CARE, ESA, and FERA

Once at the Cooling Center, customers may have the option to speak face-to-face with PG&E Customer Service Representatives (CSR) at high traffic centers who can talk with them about residential rate impacts and other programs available to help customers manage energy costs. ESA contractors are also present at some Cooling Centers to share energy saving tips with customers and encourage ESA sign-ups.

Cooling Center attendees are provided brochures and enrollment information on the CARE and ESA programs, as well as other low income assistance offerings and tips to reduce energy usage. Informational brochures are provided in 15 languages (English, Spanish, Chinese, Vietnamese, Tagalog, Hmong, etc.). CARE applications are available in large print for customers with visual disabilities. Customers interested in the Medical Baseline Program can also receive information on eligibility and guidelines for that program.

2.5 Low Income Decision Marketing Requirements

On November 10, 2016, the CPUC issued a final Decision on the Investor Owned Utilities (IOUs) CARE and ESA program applications.²⁷ The Decision sets forth several requirements to prepare for the M&O activities that will occur from the date of the final Decision and continue through 2020 including:

- 1) Coordinate with the IOUs and file a standardized and common outline for the CARE and ESA plan in the conforming advice letter;
- 2) PG&E to host a joint IOU workshop to share preliminary CARE and ESA plans; and
- 3) File a M&O plan for CARE and ESA within 60 day of the dates of the M&O workshop.

2.5.1 Common Marketing Plan Outline

In compliance with Decision requirements, the IOUs coordinated and developed a common outline to standardize the formats and types of information to be presented in

²⁷ D.16-11-022 Issued December 10, 2016. Decision on Large Investor-Owned Utilities' California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Program Applications.

the CARE and ESA plans for low income customers. The IOUs leveraged the approved outline from the Residential Rates Marketing plans²⁸ as a starting point for the development of the low income M&O outline. PG&E hosted a Joint IOU call with Energy Division staff to review the proposed outline on February 21, 2017 to obtain feedback prior to finalizing the outline that was filed as an appendix in the conforming Advice Letter on April 3, 2017.

2.5.2 Marketing and Outreach Webinar

The IOUs held several discussions with the Energy Division staff to prepare for the M&O workshop and during those discussions it was determined the IOUs would hold a webinar in advance of the full workshop to provide high level information about the IOUs' plans and approach to obtain preliminary feedback. During the webinar on April 21, 2017, the IOUs presented preliminary information on market overview and barriers, marketing strategies, measurement and integration opportunities with other programs and regulatory proceedings. The CforAT, Greenlining, Staples and Associates, and Energy Division staff attended the webinar and expressed interest to see the following types of information in the final filed plans:

- Information on how low income programs will integrate with other programs such as Statewide Marketing, Education and Outreach (ME&O) and Residential Rate Reform;
- Identification that key messages and calls-to-action in outreach materials will be placed in larger print to assist customers with disabilities; and
- Details on how programs like Medical Baseline and in-person visits prior to disconnection will be incorporated into low income program outreach efforts.

At the conclusion of the webinar the IOUs solicited interested parties to participate in additional planning sessions to help further clarify recommendations and shape the final CARE and ESA plans. CforAT and Greenlining expressed interest and began attending conference calls with the IOUs to provide greater insight and feedback on their recommendations for the low income plans.

²⁸ PG&E submitted the Residential Rates Marketing Education and Outreach plans on November 2, 2016.

2.5.3 Marketing and Outreach Workshop

PG&E held a joint IOU workshop on May 23, 2017, to share preliminary CARE and ESA plans and solicit input from workshop attendees, and present on a number of topics the Decision indicated should be in the workshop. This included barriers to enrollment, strategies to overcome barriers, strategies to reach hard-to-reach customers, engaging with CBO's, cooperative marketing with Residential Rate Reform (Rulemaking (R.) 12-06-013), Energy Efficiency Business Plans (R.13-11-005), Statewide ME&O Five-Year Roadmap (A.12-08-017), budgets, metrics and tracking.²⁹ During the workshop, parties provided feedback and comments on the IOUs preliminary plans for further consideration in the final development of the plans. The comments received included recommendations to:

- Ensure integration efforts and align messaging with Residential Rate Reform, Statewide ME&O, and other related proceedings;
- Utilize emotional messaging to connect with customers;
- Have a continued focus on overcoming barriers to participation (perceived charity, fear of providing personal information, language barriers); and
- Continued focus on specific communities including: MF buildings, non-English speaking, Seniors and disabled customers.

PG&E served a copy of the full set of notes taken during the workshop to the low income proceeding service list on July 18, 2017.

2.5.4 Marketing and Outreach Plan

PG&E has developed and is filing this revised, detailed M&O plan that incorporates input gathered from the workshop, within 60 days of hosting the Joint IOU workshop³⁰ held May 23, 2017. The Decision authorized a budget of no more than the annualized amounts approved for 2012-2014, or to 110 percent of the maximum annual, actual expenditures during that period, whichever is greater with the additional 10 percent allowed for inflation and unforeseen costs.³¹ If no budget increases were requested, the plans need to be served to the list, however, if increased budgets were required a

²⁹ D.16-11-022 Issued December 10, 2016. Decision on Large Investor-Owned Utilities' California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Program Applications.

³⁰ D.16-11-022, p. 163.

³¹ D.16-11-022, p. 164.

petition to modify the Decision is required that includes the plan and justification of the associated budget increases. PG&E is not requesting an increase of budget over the current authorized amounts and thus is serving a copy of this plan to the proceeding service list.

2.5.5 Other Marketing Regulatory Requirements

The Decision sets forth a number of specific marketing related requirements in addition to other regular ongoing efforts PG&E has planned to ensure that M&O is kept current and maintains compliance. PG&E will work to ensure the following are incorporated in the execution of the M&O efforts:

Marketing Collateral and Forms Refresh

A review of marketing collateral and forms will be conducted to ensure that current materials are compliant, determine if any materials require updates, and if any new materials need to be developed. PG&E plans to:

- Create new or revise current program marketing collateral and program forms for CARE and ESA, including materials for ESA subcontractors;
- Refresh and/or create new energy education materials that include incorporation of residential rates educational information;
- Create an easy-to-understand brochure about standing water hazards and evaporative coolers;³² and
- Provide renters with information and a pre-paid postage application the renter can pass on to their landlords on behalf of the ESA Program.³³

Accessibility

To enhance accessibility for customers with disabilities, PG&E plans to add the following items to current accessibility efforts:

- Ensure that key communications regarding enrollment into the ESA Program for customers with disabilities is provided effectively and appropriately in accessible formats such as large print, Braille, electronic and audio formats.³⁴

³² This item has been requested to be changed in the Petition for Modification to change the requirements set forth in D.16-11-022 OP 4 and will only be completed if the Petition for Modification is not approved.

³³ D.16-11-022, OP 44.

³⁴ D.16-11-022, OP 74.

- Ensure materials available in multiple languages such as English, Spanish, Chinese, Hmong, Korean, Vietnamese and Russian.
- Work cooperatively with the CforAT to resolve the logistical challenges in effectively enrolling the segment of the low income population with a disability.³⁵

Website

PG&E will evaluate the mobile website and further develop it as needed to ensure:

- Mobile applications allow for CARE and ESA program enrollment, PEV, and recertification;³⁶
- Update PG&E's online customer account portal to be viewable on the mobile website; and³⁷
- Assess ways to provide tailored messaging to customers who are highly likely to be CARE-eligible, through their online account.³⁸

Annual Reports

The CARE and ESA annual report³⁹ provides a recap of the prior year with updates on program goals and M&O efforts executed to support meeting those goals. As directed in the Decision, PG&E will ensure CARE and ESA customers are eligible to enroll in PG&E's Solar Choice Program and going forward annual reports will include the number of customers in PG&E's Solar Choice Program, and the average total bill discount that CARE Program customers receive on their bill.

³⁵ D.16-11-022, OP 74.

³⁶ D.16-11-022, Conclusion of Law (COL) 152.

³⁷ D.16-11-022, OP 102.

³⁸ D.16-11-022, OP 103.

³⁹ PG&E ESA/CARE 2016 Annual Report filed with CPUC on May 1, 2017.

Low Income Marketing & Outreach Plan

Chapter 3

Low Income Market Situation and Customer Insights

3. Low Income Market Situation and Customer Insights

This section includes a foundational market overview of PG&E's low income customers. It also covers key insights to inform M&O strategy development for the low income customer segment. In addition to the knowledge provided in this section, PG&E has additional data and insights that help inform M&O strategies, found in Appendix 2.

Successful Marketing Outreach to Date

PG&E has achieved high CARE and ESA Program participation (88 percent for CARE and 73 percent for ESA). PG&E's marketing efforts have continually built awareness in these programs, with customers reporting that PG&E-provided communications are the primary source of their knowledge about the programs.⁴⁰ Success over time has been attained through rigorous modeling and targeted multi-channel, multi-touch campaigns, as well as grass roots, community-based outreach.

There is high penetration across hard-to-reach populations including racial/ethnic groups, customers with Limited English Proficiency (LEP), households with disabled persons and households with Seniors. Enrollment is also high across the hard-to-reach customers identified in the Decision: customers living in high poverty areas, rural areas and rental units. The Decision prompted deeper analysis into these hard-to-reach populations, revealing some opportunities to appeal to the final, small group of remaining customers through nuanced M&O.

When discussing customer insights and barriers to enrollment for these populations, it is important to note that hard-to-reach segments are not necessarily mutually exclusive. For example, high poverty customers are very likely to be renters, and they might also live in rural communities. Therefore barriers and insights can be shared across these customer segments.

⁴⁰ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016, PG&E ESA Program Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4, PG&E CARE Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4.

In reaching the remaining customers, we've considered the following common barriers to participation. Population-specific barriers and insights are outlined later in this section:

- Confusion regarding CARE and ESA program qualification;
- Reluctance to take a handout;
- Being too overwhelmed with daily struggles and other priorities;
- The perception that effort to fill out the application is not worth the discount; and
- Fear of providing personal information.

ESA-eligible customers may perceive that they have no need for the program, may feel uncomfortable about having strangers in their home, and may find it difficult to be home for appointments. Additionally, renters might fear that home improvements would be cause for their landlord to raise the rent, or misperceive that they need to be homeowners to participate.

3.1 Program Participation and Satisfaction

High participation and satisfaction with CARE and ESA Programs.

PG&E's marketing effectiveness is clearly demonstrated by current high CARE and ESA participation rates. Over time, PG&E has built high engagement on the CARE and ESA programs, with an estimated 88 percent of eligible CARE customers enrolled, and 73 percent of eligible ESA customers participating in the ESA Program.⁴¹ These customers report high program satisfaction, currently at 93 percent top-box satisfaction ratings for CARE and 86 percent for ESA.^{42,43} Compared to other PG&E program participants (e.g., participants in rebates, SmartAC, etc.), CARE and ESA customers are the most satisfied with PG&E's products and services, at 86 percent top-box ratings on this attribute. These customers also show high trust in PG&E, with most CARE customers (81 percent) and ESA customers (84 percent) giving top scores regarding the statement "PG&E is a company you can trust."⁴⁴ These successes provide PG&E

⁴¹ PG&E ESA/CARE 2016 Annual Report filed with CPUC on May 1, 2017.

⁴² PG&E ESA Program Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4.

⁴³ PG&E CARE Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4.

⁴⁴ PG&E ESA Program Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4 and PG&E CARE Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4.

with insights to help us understand how to move forward to reach the eligible customer base who have not yet engaged with these programs.

PG&E also has high program participation across low income customer demographics, including racial/ethnic groups, customers with LEP, households with disabled persons, and Seniors, as discussed below.

3.1.1 Program Participation among Racial/Ethnic Groups⁴⁵

CARE and ESA enrollment is high among racial/ ethnic groups.

The largest racial/ethnic groups among PG&E low income customers are the Latino/Hispanic, Caucasian and East/Southeast Asian populations. Latino/Hispanic and East/Southeast Asian are more predominant in the CARE-eligible group relative to the overall customer base (35 percent vs. 21 percent of overall, and 22 percent vs. 10 percent overall, respectively), whereas Caucasians are less predominant (32 percent vs. 47 percent overall). There is high CARE program participation within each of the races/ethnicities as represented in the table below. CARE enrollment penetration is high across all the ethnic groups, including those that are a large proportion of the low income population as well as those that are a very small proportion of the population, such as Arab and Southwest Asian.⁴⁶

⁴⁵ PG&E's estimates of racial/ethnic makeup are based on modeled data from Geoscape, mapped to PG&E customer territory. This data is not self-reported, but derived from Census models. We use these estimates to assess our low income market and program penetration among various races/ethnicities.

⁴⁶ PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3

**TABLE 3-1
ESTIMATED PERCENTAGE OF CARE-ENROLLED BY GEOSCAPE RACE/ETHNICITY^(a)
(SEE APPENDIX 3 FOR RACE/ETHNICITY DEFINITIONS)**

	Percent of Ethnicity Within Low Income Population (Per Race/Ethnicity)	CARE Enrolled Penetration (Per Race/Ethnicity)
Latino/Hispanic	35%	91%
Caucasian	32%	86%
East & Southeast Asia	22%	92%
South Asia	2.0%	91%
African American	2.0%	89%
Arab	0.7%	93%
Southwest Asia (Non-Arab)	0.1%	86%
<hr/> (a) PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.		

Race and ethnicity data for the ESA population is captured by ESA contractors during the application process. In 2016, the most predominant race/ethnicity participating in ESA was Hispanic/Latino (38 percent), then Caucasian (37 percent), followed by African Americans (8 percent), Asian/Pacific Islander (8 percent), then Native American and Chinese (both under 1 percent). Nearly 9 percent claimed “other” race or ethnicity or declined to state.⁴⁷

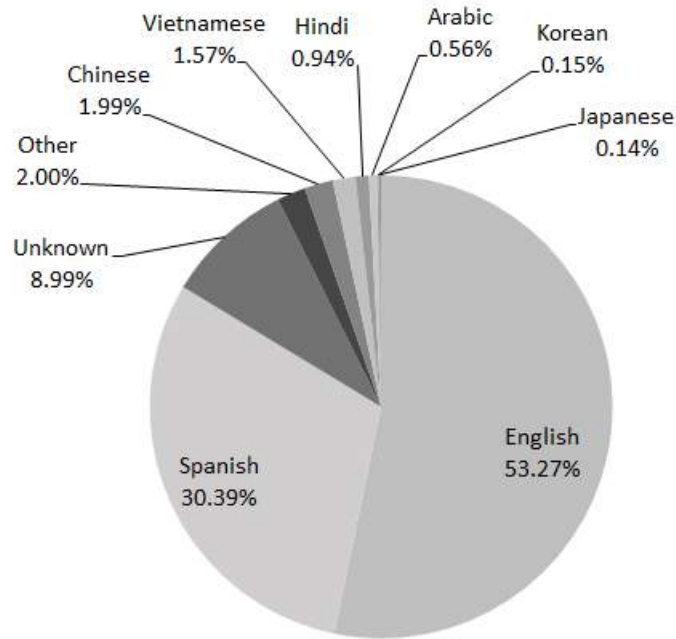
**3.1.2 Program Participation among Groups with Limited English Proficiency
CARE and ESA enrollment is high among customers with LEP.**

PG&E serves customers who speak a wide array of languages with varying degrees of English fluency. According to Acxiom modeling, the most common language preference among PG&E’s CARE-enrolled customers is English (53 percent/714K), followed by Spanish (30 percent/407K), Chinese (2 percent/27K), and Vietnamese (1.6 percent/21K).⁴⁸

⁴⁷ PG&E EPO Database, 2016 Year to Date Data.

⁴⁸ PG&E Customer Analytics and Segmentation Database, 2017.

**CHART 3-2
CARE BY LANGUAGE PREFERRED**



Low income customers are more likely than PG&E’s general population to require in-language communications and services. Mapping Geoscape’s modeled fluency data to PG&E’s customer database allows us to understand how many have lower fluency, otherwise known as LEP. Among PG&E’s low income customers, there are an estimated 214,000 LEP customers, which is 14 percent of the low income audience (double the incidence in the overall PG&E customer base).⁴⁹

PG&E offers access to in-language services across many customer touch-points, including PG&E marketing outreach, CBO efforts, the Contact Center and the PG&E website, which has helped achieve high penetration among LEP customers. Similar to the high CARE participation rates across ethnic groups, PG&E has high CARE enrollment rates among the total LEP population, with an estimated 92 percent enrolled in CARE.

PG&E has been successful at reaching LEP customers across various languages—with nearly all tracked languages above 90 percent enrollment penetration as shown in the table below.

⁴⁹ PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

**TABLE 3-3
ESTIMATED CARE PENETRATION AMONG LEP POPULATION (BY LANGUAGE PREFERENCE)^(a)**

GEOSCAPE LANGUAGE FLUENCY DATA (Language Preferred or Dependent)	Estimated Count of Low Income Customers by Language	CARE Enrolled Count by Language	Estimated CARE Penetration (by Language)
Spanish	161,300	147,242	91%
Chinese	18,274	17,317	95%
Vietnamese	15,437	14,764	96%
Asian (Indochine)	8,563	7,783	91%
Tagalog	7,238	6,495	90%
Japanese	1,019	865	85%
Korean	1,497	1,384	92%

(a) PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

3.1.3 Program Participation among Senior Population

CARE and ESA Senior penetration is high.

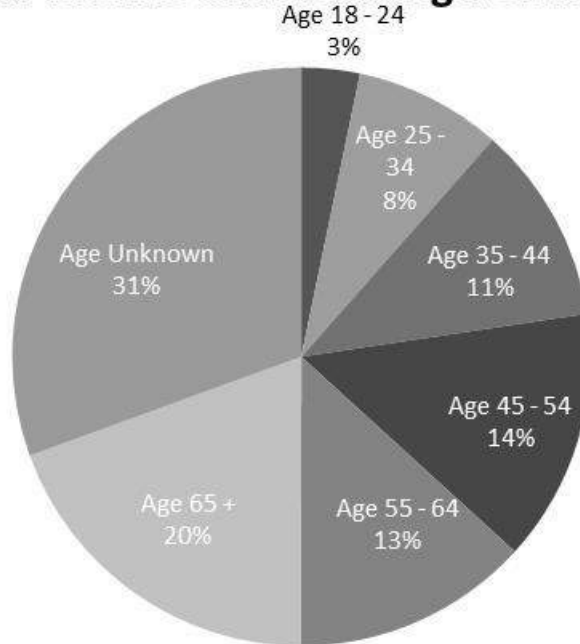
California trends show that PG&E’s territory is aging. By 2030, the youngest of the Baby Boomers will hit retirement age. The total number of Californian adults age 65 and older is projected to grow from 5 million in 2014 to 8.6 million in 2030.⁵⁰ We expect that PG&E’s population will align with those trends, thus will continue to build our understanding of this growing population’s needs. Among known ages in the estimated low income customer population, 20 percent (approximately 300,000 customers) are over the age of 65.⁵¹

⁵⁰ “Planning for California’s Growing Senior Population,” Public Policy Institute of California, 2017 (http://www.ppic.org/main/publication_quick.asp?i=1156).

⁵¹ Note that age is not a self-reported variable; instead PG&E uses Acxiom data overlays to estimate customers’ ages. Because this is modeled data, there is a portion of “unknowns,” or customers who are unable to be flagged for age-related data.

CHART 3-4
PG&E'S CURRENT AGE RANGES AMONG LOW INCOME CUSTOMERS^(a)

PG&E Low Income Customer Age Distribution



(a) PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

CARE penetration is high across age ranges (88 percent to 93 percent penetration). Enrollment within the CARE-eligible Senior population (age 65 and over), is high at 88 percent, as shown in the table below. Among 2016 ESA participants, 34 percent were recorded as Seniors, which is higher than the estimated overall low income Senior population (20 percent).⁵²

⁵² PG&E EPO Database, 2016 Year to Date Data.

**TABLE 3-5
PG&E CARE PENETRATION BY CUSTOMER AGE RANGE^(a)**

	Estimated Low Income Customer Count	CARE Enrolled Customer Count	Penetration Within Each Age Range
Age 18 - 24	50,410	46,972	93%
Age 25 - 34	127,481	117,321	92%
Age 35 - 44	171,815	156,769	91%
Age 45 - 54	218,565	197,336	90%
Age 55 - 64	205,127	182,220	89%
Age 65 +	299,949	263,092	88%
<hr/> (a) PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3			

3.1.4 Program Participation among Households with Disabled Persons

Program participation is high among households with disabled persons.

The Census definition of “disability” is broad, including a variety of characteristics that define four basic functional areas: hearing, vision, cognition and ambulation. While PG&E is not able to identify low income customers with disabilities among its overall customer database, the 2013 and 2016 Low Income Needs Assessment (LINA) report that “households that include a member who is a Senior and/or disabled person tend to reflect similar energy related interests and needs” and have high awareness of both CARE and ESA.⁵³ The reports confirm that both groups “seem to be well served by existing marketing approaches (although they tend to use electronic communication less than most other low income households).” The 2016 LINA survey reports statewide CARE participation amongst low income households with persons with disabilities at 66 percent.⁵⁴

The ESA Program tracks treated households with persons with disabilities, as reported by ESA contractors during home visits. Of the total homes treated, ESA is required to service 15 percent of homes that have a disabled household member. The

⁵³ Based on the 2013 Low Income Needs Assessment customer telephone survey.

⁵⁴ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2013, ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016

ESA Program estimates that households with a disabled customer made up 21 percent of the ESA Program enrollees between the years 2012-2016. Thus, each year PG&E has exceeded the 15 percent penetration goal requirement.⁵⁵

3.2 Areas of Opportunity: Hard-to-Reach Segments

To engage the last remaining low income customer in CARE and ESA, we've explored participation rates for subgroups of low income customers that might benefit from additional M&O attention. These populations are identified in the Decision as eligible customers who live in high poverty areas, rural counties, rental and MF housing. PG&E notes that these hard-to-reach groups are not necessarily mutually exclusive, thus customers might belong to two or more of these populations. For instance, high poverty households are statistically more likely to be renters, MF residents are most likely to be renters, and a majority of rural and high poverty areas are located in the same counties, indicating that there are eligible customers who classify as both rural and high poverty.

Overall, these segments participate in the CARE Program at high rates. But PG&E has identified areas where we can work to boost enrollments among these populations. To achieve efficiencies in marketing across groups, we've looked for correlations between where customer groups live, and have identified common barriers, which will be discussed later in this section.

3.2.1 Opportunities for Enrollment among Customers Living in High Poverty Areas

Within PG&E's territory, 14 percent of customers live in high poverty.⁵⁶ CARE penetration among high poverty customers is high at 89.4 percent.⁵⁷ Customers who live in high poverty tend to have disproportionately higher energy burdens, with some families facing energy costs as high as 40 percent of their household incomes. This customer segment likely shares barriers with renters, as the lower the customers' household income, the higher propensity they have to also rent their home.⁵⁸

⁵⁵ PG&E Annual ESA Program Reports, 2012-2016.

⁵⁶ A high poverty household has an income at or below 100 percent of the Federal Poverty Guidelines. For example, a family of four living in high poverty would have a household income of less than \$24,600.

⁵⁷ PG&E High Poverty Customers By Zip and County Report, January 2017.

⁵⁸ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

PG&E has identified counties with higher rates of high poverty customers and lower CARE or ESA participation rates as areas of focus for M&O:

- CARE: San Luis Obispo, Marin, Mendocino, Placer and Sacramento counties
- ESA: Sacramento, Lake, San Bernardino counties

3.2.2 Opportunities for Enrollment among Customers Living in Rural Areas

In PG&E's territory, 17 percent (860K) of customers live in rural areas.⁵⁹ Of those, approximately 40 percent are estimated as CARE-eligible. Overall, estimated CARE penetration among rural low income customers is high at 87 percent,⁶⁰ however PG&E has identified particular rural counties that still have below average CARE penetration, and higher numbers of ESA untreated, eligible homes.

PG&E has identified the following rural counties as areas of focus for M&O:

- CARE: Humboldt, San Luis Obispo, Mendocino, Lake, Shasta and Placer
- ESA: Grass Valley, Tracey and Turlock

3.2.3 Opportunities for Enrollment among Renters

CARE and ESA participation among renters is high.⁶¹ Within PG&E's CARE-eligible renter population, participation is an estimated 91 percent.⁶² Among ESA treated homes in 2016, 54 percent were renters, and 46 percent were owners.⁶³ Estimates indicate that renters are participating in ESA at a high rate despite prevalent barriers such as asking landlord permission or fear of rents being raised due to home improvements.

3.2.4 Opportunities for Enrollment for Multifamily, Market Rate Building Residents

In PG&E's territory, it is estimated that of approximately 33,889 MF buildings housing low income households, about 25,893 fall into the market rate building sector (defined as buildings with 5+ units that are not subsidized). The 2013 statewide

⁵⁹ Rural areas are generally defined as those isolated from larger metropolitan areas, by distance or other physical features.

⁶⁰ PG&E Rural CARE Penetration by County, December 2016.

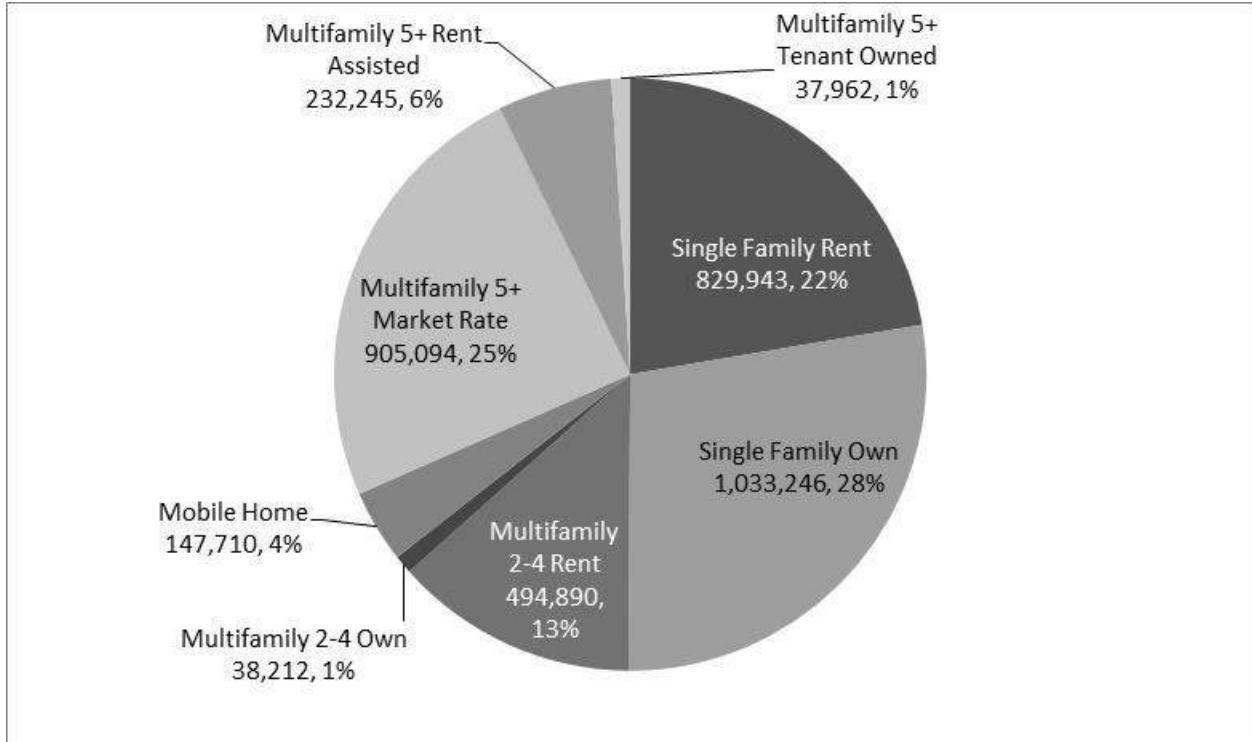
⁶¹ PG&E tracks low income participant renter demographics via third-party modeled data (Acxiom)

⁶² PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3

⁶³ PG&E's ESA EPO Database, 2017.

estimates reveal that about 95 percent of low income households in market rate MF buildings are renters.⁶⁴ Thus, their key barriers to program enrollment would be aligned with those of renters, as discussed in the Barriers and Insights Section 3.3.3.4.

CHART 3-6
ESTIMATED NUMBER OF LOW INCOME HOUSEHOLDS BY BUILDING TYPE AND OWNERSHIP STATUS^(a)



(a) ESA Program Multifamily Segment Study, Cadmus Research, 2013.

3.3 Areas of Opportunity: Customer Barriers to Enrollment and Insights

Despite CARE and ESA enrollment successes to date, PG&E recognizes the need to acquire the remaining unenrolled customers. Understanding enrollment barriers will help us to evolve specific elements of our messaging and outreach strategies, in effort to achieve enrollment goals.

3.3.1 Overcoming Common Barriers to Enrollment

CARE and ESA messaging has been refined over time to ensure we are messaging to what is most effective in driving participation—both through primary research as well

⁶⁴ ESA Program Multifamily Segment Study, Cadmus Research, 2013.

as their actual responses to marketing outreach. In PG&E research, 80 percent of CARE customers and 59 percent of ESA customers report that the top reason to participate in these programs is to save money, followed by saving energy (16 percent CARE, 38 percent ESA).⁶⁵

There is a portion of eligible, aware customers who are still unenrolled. Even unenrolled customers are highly likely to be aware of CARE (61 percent), and among those who are already on CARE, 72 percent are aware of ESA.⁶⁶

**TABLE 3-7
CARE AND ESA AWARENESS AMONGST CURRENT CARE AND ELIGIBLE NON-CARE^(a)**

	Current CARE	Eligible Non-CARE (Unenrolled)
Aware of CARE	N/A	61%
Aware of ESA	72%	47%
Recall being offered ESA	22%	36%
Don't recall being offered ESA	18%	N/A
Signed up or participated in ESA	32%	11%
<hr/> (a) PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.		

However, given that some customers have not yet enrolled, PG&E must assume the acquisition approaches have not yet been enough to compel them to take the next step. Though low income customers are driven to participate in these programs by the very emotional primary driver—to save money—there still may be barriers which prevent some from enrolling.

While PG&E has very distinct and diverse customer segments, a look across the entire population surfaces some commonalities that are important to consider as messages and tactics to acquire the remaining customers into these programs are evaluated. While overall awareness is high, there are barriers that we believe can be

⁶⁵ PG&E ESA Program Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4, PG&E CARE Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4.

⁶⁶ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

more directly addressed going forward to compel reluctant customers to enroll. We see these falling into two primary categories:

- 1) **Confidence and Understanding Barriers** – Eligible customers report that they often don't think they qualify for the program and can struggle to assess their income relative to the guidelines.
- 2) **Attitudinal and Process Barriers** – There are a number of areas we will continue to address related to attitudes and process issues, including:
 - Being overwhelmed by daily struggles
 - Reluctance to take a “handout”
 - The application effort is not worth the discount to them
 - Fear of repercussions for not filling out forms correctly
 - Fear of providing personal information

3.3.1.1 Confidence and Understanding Barriers

Confusion Regarding Qualification

Eligible non-enrolled customers may experience confusion regarding program qualification, often reporting that they don't think that they qualify for CARE. This perception indicates lack of awareness or confusion regarding the income guidelines. PG&E's 2016 Quantitative study revealed that among PG&E's eligible non-CARE customers, 61 percent was aware of the program. Of those customers who were aware of the program, most customers (58 percent) believed that they would qualify for the program, but still, there were many customers who didn't think that they would qualify (42 percent, or 2 out of 5 customers who are aware of CARE). Note that these customers were screened and included in the study based on CARE-eligibility, by household income and size, and/ or categorical acceptance guidelines.⁶⁷ If customers aren't enrolling in CARE due to confusion about whether they qualify for the program, then it follows that they might not consider themselves as candidates for other low income programs like ESA. Additionally, ESA customers may not think that they are eligible for qualification if they are renters, believing that participants must own their homes.⁶⁸

⁶⁷ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016

⁶⁸ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013, PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

3.3.1.2 Attitudinal and Process Barriers

Overwhelming Stress

Customers report being extremely stressed with the constant struggle to cover basic needs for themselves and/or their families, juggling paying for basics like food, rent, healthcare, child care, medical needs, and transportation costs to get to work or drive kids to school. They also experience a high degree of stress from difficulties with job security.⁶⁹ The need to spend money on heating or cooling to keep household members comfortable can be stressful as well, particularly when the household includes the very young, Seniors or those with medical needs.⁷⁰ When customers are overwhelmed and stressed, they've reported that they feel that they don't have time or energy to pay attention to longer or seemingly complicated communications or applications, or to address needs beyond those that are essential.

Reluctance to Take a Handout

Among eligible non-CARE respondents in PG&E's customer focus groups, some expressed reluctance to take what they perceive to be a "handout." Some customers relayed stories regarding the "shame" of being in poverty, not even telling their friends and family that they need assistance. Rural respondents particularly expressed lack of desire to enroll in low income programs, because they believe that there is a limited pool of funds and that other households in their community might be in greater need.⁷¹ Other focus group respondents have relayed feelings of shame regarding their financial situations, which inhibits them from seeking support services.

"I still would find a little bit of resistance just feeling like I'm working, so I shouldn't apply for welfare." (Eligible non-CARE rural customer)⁷²

"There are people whose needs are great and maybe there are not enough funds for everyone so I don't want to take it from someone else." (Spanish speaking CARE customer)⁷³

⁶⁹ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013 and PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

⁷⁰ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013.

⁷¹ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

⁷² PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

⁷³ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

Lack of Understanding About How to Fill Out the Income Qualification Portion of the Application, and Fear of Repercussions for Incorrectly Filling Out Forms

Some PG&E focus group customers fear that if they fill out the enrollment forms incorrectly, there will be financial repercussions. They explained that calculating household income can be challenging or confusing due to discomfort of asking housemates for their income, or inability to anticipate incomes due to seasonal or unsalaried work. Some current CARE customers even expressed concern that if their financial situation changed once on the program, they could get in trouble.

“I just don’t want to make a mistake and later on...you’re going to come back and sue me.” (Eligible non-CARE customer)⁷⁴

The Application Process May Not Be Worth the Potential Benefits

Twenty-four percent of eligible non-CARE customers felt that the potential savings will not be worth the effort to sign up.⁷⁵ Because ESA customers must be CARE enrolled, this naturally presents a barrier for ESA well. In qualitative discussions, customers revealed that this feeling was based on previous experience with other income qualified program applications. However, in 2016, nearly all customers who were on the CARE discount reported that the application process was easy (95 percent),⁷⁶ and that the discount was viewed as a generous, significant amount.⁷⁷ Only 31 percent of eligible non-CARE customers anticipate that they’ll achieve “a lot of savings.”⁷⁸ However, once on the program, 43 percent of CARE customers believe that the program offers “a lot of savings.”

Fear of Providing Personal Information

PG&E low income focus group participants have expressed skepticism regarding giving out personal information. They wonder whether their personal information is secure, or if the company has alternative motives for using the data.⁷⁹

⁷⁴ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

⁷⁵ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016 and PG&E CARE Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4.

⁷⁶ PG&E CARE Customer Energy Solutions Composite Study, Hiner & Partners, 2016, Q4.

⁷⁷ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

⁷⁸ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

⁷⁹ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013.

Focus group participants have also related fears of providing personal information due to their immigration status, particularly expressed by Hispanic/Latino and Spanish speaking customers. Customers who fear that their immigration status may be revealed by providing personal information on an application might not admit to this barrier in quantitative surveys (or they may not participate in surveys at all). Given this sensitivity, this barrier would be a difficult metric to track.

Given the current political landscape regarding immigration status, willingness to participate in programs that require home visits and concern about providing personal information may increase. This could raise challenges for programs, for example, when it comes to providing information on CARE applications, PEV forms, ESA applications, and during ESA home visits as people become increasingly cautious and protective.

“People don’t want to send all of this personal stuff. Your identity may be stolen.”
(Former PEV Fresno)⁸⁰

“This is not for people like us. Most of us get here through the back door so no, it is not for us.” (Non-CARE Spanish Berkeley)⁸¹

“Too much paperwork and a lot of people are afraid about their immigration status.”
(Non-CARE Spanish Berkeley)⁸²

3.3.2 ESA-Specific Barriers

ESA-eligible customers have related barriers to enrollment. Some have the perception that the program offering may not be worth the time required to participate. Among program participants and non-participants, it may be difficult to take time off work or to be home during the day, especially for multiple visits. This is more often reported by Spanish-speakers, single-family homeowners and mobile home residents.⁸³ Qualified customers who rent may misperceive that participants must own their homes in order to qualify for the program.⁸⁴ Or, they might perceive a lack of need for ESA Program offerings. Non-participants, especially single-family homeowners and mobile home residents, may perceive that they find no need for the program, or that

⁸⁰ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013

⁸¹ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013

⁸² PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013

⁸³ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2013.

⁸⁴ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013, PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016

their appliances are working well.⁸⁵ Some customers report being skeptical, cautious or uncomfortable about having strangers in their home. This is particularly prevalent among undocumented immigrants and Seniors.⁸⁶ Language can also present a barrier to non-English or non-Spanish speakers. Scheduling appointments can be a challenge, particularly with follow-up communications and visits by contractors who may not always communicate in the customer's language.⁸⁷ Finally, ESA brand awareness can be obscured by the ESA Program name, as demonstrated by the LINA survey respondents' heightened program awareness when the program is *described* as opposed simply called by name ("ESA").⁸⁸

3.3.3 Barriers and Insights Specific to Hard-to-Reach Populations

PG&E also recognizes that there are hard-to-reach populations who have not yet received dedicated attention. Among these populations are renters, customers in MF properties, customers in specific rural and high poverty areas, undocumented immigrants, and tribal customers. Understanding barriers specific to these groups will help us to develop nuanced strategies for relevant and compelling M&O. Below are high-level summaries of key barriers to enrollment for these populations.

3.3.3.1 Customers Living in High Poverty Areas

Customers living in high poverty tend to have disproportionately higher energy burdens, with some families facing energy costs as high as 40 percent of their household incomes. The lower the customers' household income, the higher propensity they also have to rent their home.⁸⁹ Therefore, this customer segment likely shares barriers with renters (see Renter and Multifamily Barrier Sections 3.3.3.3 and 3.3.3.4 for specifics).

⁸⁵ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2013; ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

⁸⁶ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2013; ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

⁸⁷ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

⁸⁸ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2013.

⁸⁹ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

3.3.3.2 Customers Living in Rural Areas

PG&E Rural focus group customers discussed feelings of self-reliance, thus some reject the notion of taking any sort of a “handout.” Some rural customers also felt that others might be in greater need, thus they wouldn’t want to “take” money away from others in their community. Rural customers also suggested that they might best be reached through local TV and neighborhood payment centers. This implies that trusted sources of information are important to them.

3.3.3.3 Low Income Renters

Renters have specific barriers to program enrollment. Most of these barriers relate to ESA participation.⁹⁰ Some renters hold the perception that one must be a homeowner to participate in ESA.⁹¹ Other barriers may include the “split incentive,” which means that whether the renter or landlord pays the energy bill, there can be a feeling of limited personal incentive to participate in CARE or ESA as the perception might be that the landlord or building owner will receive more of the benefit. Additionally, low income customers who rent their homes have reported fears that any home improvement could cause the landlord to raise the rent. That information is amplified by the fact that these customers face greater insecurity over their ability to pay bills than home owners.⁹²

3.3.3.4 Customers Living in Multifamily Buildings

Low income tenants of MF properties face some similar barriers to renters such as gaining landlord approval and moving more frequently than homeowners. In addition, those who live in MF units tend to have lower energy costs (and thus fewer opportunities to save energy) and lower energy insecurity, or difficulty paying their energy bills, than those who live in single-family homes.⁹³ Though they have fewer opportunities to save energy, they do report that they attempt to reduce their consumption by:

- Turning off or unplugging appliances and electronics that aren’t in use

⁹⁰ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

⁹¹ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2013, PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016

⁹² ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

⁹³ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

- Turning off lights when not in use
- Turning off heating or cooling systems

Because they perceive that they are less able to save money, but do report issues with heating and cooling, some MF dwellers might be intrigued by a comfort-based message. They particularly report excessive warmth in the summer (some lack air conditioning), cold due to bad insulation, no real overhead lighting (rely on plug in lamps, sunlight), and heating/cooling equipment failures.

3.3.3.5 Undocumented Immigrants

PG&E does not have a means of identifying undocumented immigrants via database attributes. We've relied on information from the Public Policy Institute of California (PPIC) to gauge the prevalence of this population in PG&E counties. Undocumented immigrants are not identified in national or state surveys; however estimates suggest that in 2014, California was home to between 2.35 and 2.6 million undocumented immigrants with approximately 1.2 million living in PG&E counties. The Pew Research Center estimates that 71 percent of California's undocumented immigrant population is from Mexico. PG&E counties with the highest estimated populations of undocumented immigrants include: Santa Clara (183.5K), Alameda (129.5K), San Bernardino (188K), Contra Costa (77.5K), Monterey/San Benito (62K), and San Mateo (59.5K), Kern (58.5 K), Fresno (58K), Sacramento (56.5K), and San Joaquin (49K).⁹⁴

PG&E will consider that due to the current administration's new policies, undocumented immigrants may feel increased fears of exposure of immigration status and possible deportation. As reported in the Common Barriers Section 3.3.1, PG&E's Spanish-speaking focus group attendees have discussed their fears of providing personal information due to immigration status. Filling out applications, signing declarations, providing personal information and income documentation, door-to-door approaches, etc., may be an issue for this population and those housing them. The PPIC notes that many undocumented immigrants live with family members who are

⁹⁴ "Just the Facts: Undocumented Immigrants in California," Public Policy Institute of California, 2017 (<http://www.ppic.org/publication/undocumented-immigrants-in-california/>).

citizens, who might also be protective of their family members and cautious about signing up for programs or letting unknown people into their homes.⁹⁵

3.3.3.6 Native American Tribal Communities Overview

Native American Population

The Native American population in PG&E's territory has varying needs and structures across different tribes. Seventy-six federally-recognized tribes⁹⁶ exist within PG&E service territory. Membership numbers range from 5 to 5,000 enrolled members per tribe, with tribal territories located in rural to highly populated cities. The total number of individuals self-identifying as Native American in California is 719,261 and the total number within PG&E's Service Territory is 364,247. This Census data includes not just the registered members, but also those self-identifying as being Native American.

Low Income Native American Population

According to the U.S. Census, 39 percent of the total Native American population living on reservations lives in poverty.⁹⁷ Unemployment rates are typically higher than the national average, ranging between 14.4 percent overall or as high as 35 percent in some reservation communities. The total number of individuals identifying as Native American living below poverty is 79,471 (21.82 percent), across the California.² This presents an opportunity for PG&E's low income programs to support these customers.

Native American Tribal Membership and Structure

Individuals that meet requirements set by each tribe make up the formal, registered tribal membership, though many tribal communities are home to enrolled and non-enrolled Native Americans. Tribal members elect a governing Tribal Council to oversee development of tribal land, casinos, business enterprises, and programs. Tribal governments are evolving and are increasingly engaged in management of a wide

⁹⁵ "Just the Facts: Undocumented Immigrants in California," Public Policy Institute of California, 2017 (<http://www.ppic.org/publication/undocumented-immigrants-in-california/>).

⁹⁶ 76 federally recognized tribes in PG&E Territory – See Appendix 4 for PG&E Service Territory + BIA map.

⁹⁷ U.S Census, "Disparities in STEM Employment by Sex, Race, and Hispanic Origin," <https://www.census.gov/prod/2013pubs/acs-24.pdf> (September 2013).

range of service offerings, including social services, health services, economic development and energy management.

Thirty-six of the federally-recognized tribes within PG&E's service territory own and operate a casino.⁹⁸ While annual casino revenue in CA was \$7 billion in 2015,⁹⁹ the state's main revenue-generating casinos are owned by tribes outside of the PG&E service territory. To understand differences in infrastructure and engagement, PG&E has identified three segments of tribal communities for M&O efforts:

With casinos: Tribes with casinos are familiar with the energy costs associated with casinos and generally have energy departments in place that can be leveraged to more easily identify and reach low income program participants.

Without casinos, rural: Rural tribal communities without casinos lack revenue and generally face higher unemployment rates and economic barriers that increase the energy burden. While communicating with these communities is more difficult, they represent significant opportunity to support low income customers.

Without casinos, non-rural: Tribal communities in more heavily populated areas generally attract larger numbers of Native Americans looking for employment opportunities while living within the tribal territory.

3.3.3.7 CARE Marketing Non-Responders

A CARE-eligible customer who receives a direct marketing communication, but does not sign-up for CARE is considered a "non-responder." In early 2016, PG&E performed an initial segmentation analysis as a first step to evaluate the opportunity to reach the over 893,000 CARE non-responders from CARE marketing efforts during 2015. Looking at the customers included in the analysis revealed the following:

- 38 percent of the CARE non-responders had received an email from PG&E in 2015 (not limited to CARE messages), with the majority of these receiving 10 or more emails.
- 68 percent who received an email opened at least one, and 15 percent clicked through to the web from an email.

⁹⁸ <http://www.courts.ca.gov/3066.htm>.

⁹⁹ <http://www.cdcmgamingreports.com/native-american-casinos-continue-growth-overtake-commercial-casinos/>.

Based on these interactions, PG&E perceives that the CARE non-responder customer base does engage with some of the PG&E messages. Therefore, there may be an opportunity to convert these customers to CARE Program participants.

PG&E plans to further survey the non-responders to understand relevance of various new messaging strategies, media channels and tactics. The research is intended to evaluate what portion, if any, of the non-responder universe also falls into hard-to-reach groups, and to uncover barriers to enrollment among them. The research would help uncover barriers that would help inform whether shifts in strategy could motivate these customers to enroll in CARE.

3.3.4 Insights and Barriers Related to Low Income Customers' Energy Burden, Use and Behaviors

Many low income customers struggle with the portion of their income that goes to energy costs (“energy burden”), yet some do not take measures to follow basic energy conservation practices. Though energy burden has been trending downward over the past few years, a third of low income households in the 2016 LINA study reported that they struggle with energy bills either often or constantly. Populations that specifically struggle with energy bills include:

- Households with incomes up to 300 percent of the Federal Poverty Line (or Guidelines), which includes all low income households and extends half way through the moderate-income range) report elevated struggles paying their energy bills (measured by the *energy insecurity* metric).¹⁰⁰
- Households with Seniors report more struggles than other low income households in paying energy bills (i.e., more **energy insecure**), but working-age adults with dependents face more challenges paying basic living expenses overall (i.e., reflect more material hardship).¹⁰¹
- Renters in MF buildings show higher unmodified energy burden in 2016 (a change since the 2013 study) due to comparatively lower incomes, but their energy usage and bills are the lowest of the housing groups analyzed. This presents a challenge for PG&E, as there are relatively fewer measures that MF

¹⁰⁰ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

¹⁰¹ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

renters can, or see the need to take to reduce their already lower energy usage.¹⁰²

Fewer than half of struggling households (43 percent) said that they consistently follow basic energy conservation practices. And, more than half of all low income households said that they could not heat or cool their homes any less (i.e., to try to lower their energy bills) without impacting their households negatively. This data suggests that a large proportion PG&E's customers who are struggling, can benefit not only from the CARE and ESA Program offerings, but also from energy management education that can further help them to save money on their bills.

¹⁰² ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

CARE and ESA Marketing and Outreach Plan

Chapter 4

Marketing Plan

4. Marketing Plan

4.1 PG&E's Low Income Marketing Goals

PG&E's primary marketing goal is to help low income customers save on their bill and manage their energy use by generating awareness, understanding, and participation with the CARE and ESA programs, as well as retention in the CARE Program.

Secondarily, PG&E aims to build awareness of holistic energy management opportunities including rate plan options, tips and tools to help low income customers achieve further success at managing their energy use and saving money.

4.1.1 Overall Marketing Strategy

PG&E will apply a two-fold strategy to acquiring the remaining income qualified customers:

- 1) Continue to use methods that have accomplished current high awareness and acquisition levels; and
- 2) Evolve specific elements of our messaging and outreach to speak more specifically to the remaining individuals and the nuanced barriers they are experiencing.

Over the next four years, PG&E will put the customer front and center by focusing on making it easier for customers to participate in CARE and ESA by presenting the right offer at the right time, in the right place, to maximize engagement and help customers lower their bill.

Upon enrolling in CARE, participating in ESA, or being identified as likely income eligible for these programs, PG&E will help customers along their energy management journey by serving up low/no cost tips, tools and other programs via the residential newsletter, in-home energy education through the ESA Program, and other communication channels. This ongoing energy management education will help low income customers realize even greater savings throughout their relationship with PG&E.

4.1.2 Supporting Strategic Principles

Leverage the power of repetition in the right channels. PG&E will surround low income customers in a steady drumbeat of CARE and ESA program messages designed to break down barriers to participation in their preferred channels. PG&E's targeted paid media campaigns will be designed to demonstrate the value of low income programs and pave the way for direct marketing efforts that will have more specific, targeted messages to its diverse customer base. PG&E asserts that repetition of primary messages is critical to ensuring that customers engage in any of its programs. In best practices and research, PG&E has found that it can take from 3-5 messages for customers to engage.¹⁰³

Reach customers through the channels they prefer: In analyzing the media consumption habits of low income populations within PG&E's service territory, data shows that online newspaper ads, promotions and coupons—both online and on retailer websites—personal recommendations (or Word of Mouth), and TV ads are consistently rated high by all segments for influencing the consideration process. (Refer to Appendix 2 for more information on low income media consumption). In addition, PG&E's past campaign results suggest that direct marketing tactics are highly effective.

PG&E will pay special attention to two audiences that show variations in media consumption preferences. The Hispanic population is more influenced by digital and social media advertising, while Seniors are more heavily influenced by their social networks and traditional advertising.¹⁰⁴

Engage customers through relevancy: PG&E engages customers in tips, tools and programs by capturing customer attention at points in the customer journey where they will find these messages most helpful and relevant. For example, PG&E times outreach efforts with when customers may be paying more attention to their bills, like in the summer and winter when bills can be higher for many customers. This is an opportune time to remind customers about the need to conserve and adopt positive and sustained energy behaviors in an effort to mitigate large swings in their seasonal bills. In addition, when customers enroll in CARE, they receive not only critical messages

¹⁰³ Frequency and sequence testing results, Targetbase 2015 CARE End of Season Analysis, Executive Summary p. 4, November 16, 2015.

¹⁰⁴ Pointlogic Commspoint Journey 2017 – compiles direct consumer research, surveys conducted amongst media experts, and results from measuring the ROI of media at stages of the customer cycle.

about participating in the program, but also additional programs such as ESA, as well as tools, alerts and/or behavioral examples to help them further manage their energy use. PG&E also understands that behavioral change can be challenging if the benefits of an effort aren't immediately recognized. To overcome customer apathy, PG&E will present real customer stories to bring to life how simple changes can reduce their energy costs.

Test, learn and optimize: PG&E plans to continually measure marketing effectiveness and key marketing performance indicators, such as how PG&E is reaching and achieving its objectives with hard-to-reach customers. PG&E continually tests marketing strategies, tactics and messages through a combination of research and in-market data achieved through A/B testing. The focus on testing and measurement is critical to improving marketing approaches and ensuring that outreach is as cost effective as possible.

Leverage customer insights to inform messaging: PG&E has significant data on low income customers pertaining to how and when they respond to these programs, their connection with specific messages and their response to tactical elements. PG&E uses these insights to drive messaging strategies, focused on a customer journey approach. This approach allows us to message to the phase of the journey that customers are in, reflecting a distinct understanding of their situation, needs and barriers. The goal is to keep them moving through the journey by being relevant, clear and supportive at every step.

Our specific messaging approaches for each phase are outlined in the journey below. These approaches are based on a set of fundamental strategies intended to communicate with relevance, create understanding and trust, address key barriers and support customers to become more engaged with their energy use now and into the future.

**TABLE 4-1
MESSAGING STRATEGIES FOR BARRIERS**

Barriers	Messaging Strategies
Perception that programs aren't worth the time to enroll/engage, savings won't be significant	Demonstrate meaningful, personalized benefits to customers throughout the journey.
Reluctance to engage based on confusion, fear, mistrust	Outline what customers can expect throughout the journey, what is/isn't required at each step, why information is needed. Reassure with supportive messages and access to help when they need it.
Hesitation to accept a handout	Normalize the programs and create connection through testimonials, real stories, and localized data. Frame the offer as a benefit available to the customer. Assure the customer that participating in ESA helps us meet energy conservation goals.
Apathy or conflicting priorities – customers know about the programs but aren't compelled to act	Demonstrate how easy it is to participate and the value of program benefits
Attrition – customers choose to abandon the program at any point throughout the journey because they are confused, overwhelmed, unhappy	Continue to message through the entire journey, and after acquisition has happened to foster ongoing trust, engagement and advocacy.

4.1.3 Overall Low Income Target Audiences

Many remaining income eligible customers are considered harder to reach by one or more characteristics, often expressing common barriers to participation. Current marketing efforts are effectively converting customers in these hard-to-reach groups, so future marketing strategies will focus on refinement and personalization to gain customer trust and willingness to participate in these beneficial programs.

PG&E leverages propensity modeling to identify those customers most likely to qualify for the CARE and ESA programs. Propensity modeling is a best practice that allows marketers to more precisely target the desired audience. The nature of modeled data can mean that some unqualified customers may be contacted; however the benefits of the model outweigh this risk. PG&E continually refines the propensity model and the ways in which it is leveraged for marketing outreach to ensure only the most qualified customers are targeted.

Additionally, PG&E leverages the CARE customer base for ESA acquisition marketing efforts as a trusting and satisfied relationship already exists with the customer.

PG&E has done additional analysis on a number of hard-to-reach groups that require particular attention for CARE and ESA M&O, see Section 3.2. Some of these groups are specific to location, such as counties with lower program penetration rates, rural communities and high poverty areas. Some rural and high poverty areas are in counties with high penetration rates, indicating that current marketing strategies are largely resonating with these customers and perhaps only require slight strategic modifications. PG&E will attempt to reach customers in the few lower-penetration areas with hyper-local marketing strategies as described in Section 4.5.2, as well as widening direct marketing targets beyond the propensity model to ensure that all customers in those areas are reached with direct tactics.

Other hard-to-reach groups include customers with disabilities, renters, Seniors, customers with LEP and/or literacy, undocumented immigrants, and customers most impacted by changing rates and seasonal bill fluctuations. Customers living in MF properties are of particular focus for the ESA Program, and outreach efforts are detailed in Section 4.3.2.4.

PG&E also plans to pay special attention to both high usage customers¹⁰⁵ and those deemed highly impacted by rate plan changes to help these customers control their bill by reducing usage.

4.1.3.1 CARE Specific Target Audience

While specific marketing activity described in this plan will address hard-to-reach groups, PG&E's acquisition marketing efforts target two priority groups within the low income residential population: (1) eligible, non-enrolled customers; and (2) customers who need to recertify.

PG&E leverages a propensity model to target eligible, non-enrolled income qualified customers. The CARE propensity model was developed in 2013, and further enhanced in 2016, and constructed using data collected from the PEV process, looking at variables that were deemed to be positive or negative indicators of a customer's

¹⁰⁵ High usage customers are defined as those who are 400 percent of baseline. Those most impacted by rate changes are those who have seen at least 10 percent or \$10 increase on a monthly basis versus the previous year.

qualification for CARE. The current model uses 21 variables to create an algorithm to score customers based on predicted CARE qualification. PG&E's residential customer database (CARE and non-CARE) is scored quarterly and grouped into ten deciles. The most likely eligible customers are those in the lower deciles, so PG&E uses the following targeting criteria:

- Deciles 1-3
- Decile 4 with income qualifier of <\$100,000
- Decile 5 with income qualifier of <\$70,000
- For both deciles 4 and 5, records with a null income are removed.

All CARE participants (outside of deciles 1-2) are required to recertify every two years, or every four years if on a fixed income. Approximately 15 percent of customers do not recertify, so they would then be available for CARE remarketing efforts. PG&E targets those customers who failed to recertify within deciles 1-8.

Additionally, PG&E plans to target customers identified as marketing non-responders who have not previously responded to prior marketing from both of the above segments.

4.1.3.2 ESA Specific Target Audience

ESA M&O efforts are primarily directed to CARE-enrolled customers living in ESA-eligible homes. PG&E utilizes an ESA enrollment propensity model to predict a customer's likelihood of completing an ESA home assessment compared to other customers. This model considers 27 different predictive variables ranging from behavioral, demographic, and premise attributes. Marketing efforts are directed toward customers in the data model's high propensity deciles.

Priority sub-segments of CARE-enrolled customers have also been defined, including new CARE customers and those who have high energy usage, have recently moved, have provided income documentation for the CARE PEV process and/or have been on the program for six or more years. An analysis of these sub-segments in the first quarter of 2017 revealed that 18 percent of customers were in two or more segments. Seventy-one percent of this audience exhibits high propensity to complete an ESA home assessment.

4.1.4 Customer Journey¹⁰⁶

All customer engagement follows a journey – whether a brand is seeking to engage customers in behavior change, buying a product or enrolling in a program. These journeys are not always linear from end-to-end, and customers may move forward or backward based on new market conditions, barriers, and/or their individual needs and experiences. The included customer journey for CARE & ESA acquisition journey is based on PG&E’s deep insights about low income customers, feedback and performance of past marketing and best practice modeling. Below is a key to help explain the structure of the journey which is discussed in PG&E’s marketing plan and attached in Appendix 5:

- **Objectives** – These are the highest-level phases of the customer journey from gaining awareness that PG&E can help them reduce their energy costs through a discounted rate and home upgrade program, understanding that they are eligible for these programs based on their income, signing up for one or both programs, and subsequently managing their energy use through ongoing energy education. Some objectives can encompass several stages of the customer journey.
- **Stages** – These are the distinct steps customers find themselves in when navigating the journey through CARE and ESA.
 - Aware but unengaged - when they first consciously become aware of the program(s).
 - Willing to engage – when customers are actively learning about the programs and may have questions or lack trust in the programs.
 - Learning more – when customers are beginning to consider enrolling in the programs.
 - Applying – when customers apply for a program.
 - Sticking with the process – the phase when customers are actively interacting with PG&E, contractors and other program elements. This phase is different for CARE and ESA, as the program interactions are so

¹⁰⁶ Pointlogic Commspoint Journey 2017 – compiles direct consumer research, surveys conducted amongst media experts, and results from measuring the ROI of media at stages of the customer cycle.

different, with ESA requiring a contractor relationship, home visits, home treatment, etc.

- Talking to others – the time after conversion when they may be actively thinking about and talking about their experience (good or bad).
- **Doing/Thinking/Feeling** – These are the areas of the map where PG&E applies research and understanding of the customer journey to understand what customers are actually doing in the process, what they are thinking or saying about it, and what they might be feeling. *Feeling* explores three possible emotional states. When the customer reaches the most positive emotional state, they are more likely to progress to the next stage in the journey.
- **Messaging Strategies and Messaging Examples** – Based on the above, PG&E has proposed a number of possible message directions and proof points per stage to help guide the customer toward the most positive emotional state and then onward through the journey. PG&E will be selective about the number and mix of strategies deployed so as not to overwhelm the customer and cause stalling or backsliding through the journey.

Please see Appendix 5A for the CARE and ESA customer acquisition journey as well as 5B for the low income tactical plan which summarizes the communications that are included in this plan.

4.2 CARE Marketing Plan

PG&E's CARE marketing plan addresses key phases in the low income customer journey. The plan initially focuses on implementation of awareness and acquisition campaigns to bring customers into the CARE Program.

After enrollment, the emphasis shifts from awareness and acquisition campaigns, to retention efforts that will initiate communications intended to help customers better understand program nuances and requirements around the recertification and the Post-Enrollment Verification process, as well as move them forward along their energy management journey by serving up low/no cost tips, tools and other programs to help them realize even greater savings.

4.2.1 CARE Marketing Strategies

With strong overall penetration rates for CARE,¹⁰⁷ the marketing strategies through to 2020 will focus on maintaining a high level of awareness¹⁰⁸ and breaking down barriers while also leveraging CARE as an entry point to other programs intended to help low income customers. PG&E's will continue to create communication streams that build stronger relationships with low income customers through ongoing promotion of CARE, along with other products and services that are available as a set of solutions to support our customers with managing their energy bill and usage.

There are four central strategies that will help customers in their energy management journey:

- 1) **Refine CARE messaging strategies to directly address the identified barriers to CARE participation.** The CARE messaging strategies create a foundation for effective communications to customers. These messages are thoughtfully crafted around the barriers to participation that have been identified, and play an important role in how PG&E creates an emotional connection with customers. While research shows progress being made in communication against some of the barriers, there is still work to be done to determine how best to message to move customers through the remaining barriers.
- 2) **Maintain high levels of awareness and understanding through multi-channel outreach targeting existing CARE customers, including newly eligible and failed-to-recertify customers.** CARE paid media campaigns will serve a dual-purpose in the plan. These campaigns will provide newly eligible, failed-to-recertify and hard-to-reach customers with the program background needed to understand the benefit of CARE to their financial situation and support them in making an informed decision about participation.

Targeted paid media campaigns will also provide existing customers with visibility to PG&E's customer outreach programs, so that they are informed of the requirements to remain on the program.

¹⁰⁷ CARE penetration rate as of May 2017 is at 88.9 percent of estimated eligible households (PG&E monthly CARE enrollment and penetration report).

¹⁰⁸ PG&E's 2016 Quantitative study revealed that among PG&E's eligible non-CARE customers, 61 percent are aware of the program.

PG&E's marketing campaigns will be designed to create visibility for low income programs and create a framework for acquiring customers by surrounding them with low income messages in their preferred channels.¹⁰⁹ By engaging with customers through a variety of media channels, PG&E will be able to maintain a strong level of awareness about CARE features and benefits.

- 1) **Drive customer acquisition through multi-touch, multi-channel campaigns that align with PG&E low income customers' channels of choice and address the need for multiple prompts to action.** Customer acquisition marketing is intended to generate a customer response to a specific communication tactic, and drive action through to conversion.¹¹⁰ PG&E's CARE marketing plan places focus on engaging customers through a variety of media channels in an effort to be present when the customer decides to act. Additionally, the plan enlists multiple response mechanisms such as the option to apply by live call, text, online or paper application. This will provide customers greater ease and convenience, and should increase response rates and enrollment.
- 2) **Retain customers on CARE, deepening the customer relationships through an engaging onboarding experience and ongoing exposure to energy management information, tips and tools.** Customer retention activities will place focus on reducing customer attrition to retain as many customers as possible on the CARE Program.

Retention efforts such as delivery of a welcome kit upon enrollment, and other relevant program messages throughout the low income customer journey help to drive awareness and understanding of program requirements like PEV and the recertification process. Additionally, retention communications offer the opportunity to provide customers with important energy management tools and tips that further develop a trusting relationship and can help customers save more on their energy bill.

¹⁰⁹ Commspoint Journey – Pointlogic Media.

¹¹⁰ A CARE conversion is defined as the customer's enrollment in CARE.

4.2.2 CARE Messaging and Marketing Tactics

PG&E's diverse territory and customer base requires a range of tactics that demonstrate understanding of customer needs and concerns to capture their attention, and create engagement.

4.2.2.1 Messaging Approach

PG&E recognizes that for the low income customer, the key barriers to participation are especially emotion-driven. In order for our customers to become engaged with CARE marketing tactics, PG&E must demonstrate empathy; an understanding of what they encounter when working to manage and maintain their household. Examples of this could be including different customer scenarios in a communication; using language that is culturally relevant; and directly acknowledging the stress that accompanies paying monthly bills.

PG&E messaging is designed to:

- Leverage a loss aversion message to diminish the feeling that CARE is a handout.
- Highlight minimum percentage savings to establish the tangible value.
- Underscore the quick and easy application process to demonstrate understanding of time pressures.
- Normalize participation by sharing current number of participants, and referring to the fact that CARE is designed for "everyday Californians" to help customers understand that they are far from alone in their need for financial support.
- Reassure customers that the application process is safe and secure, so they don't need to worry about providing personal information.

Below are examples of how distinct messaging strategies are utilized to address key barriers for CARE audience segments.

**TABLE 4-2
CARE MESSAGING STRATEGIES FOR BARRIERS**

CARE Audience Segment	Barrier or Concern	Emotional Driver	Messaging Example
Newly Eligible	Don't have time to fill out forms and paperwork	"I feel completely overwhelmed by all of the demands on my finances and time. I just can't get ahead."	The simple CARE application only takes a few minutes to complete.
Newly enrolled CARE customer	Need more options to save money and energy	"The discount on my bill helps, but I'd still like to save more."	You could save more energy and money with the ESA Program.
Failed-to-Recertify	Unsure of recertification requirements	"My CARE discount has expired and now my bill has gone up."	We know it's important that you keep saving on your bill, so all you need to do is re-enroll. It's quick and easy.

Improvements in marketing enrollment rates, as well as participant answers from research, indicate that progress is being made in addressing several of the barriers. The key barrier of being overwhelmed and time constrained will continue to be something that marketing messages will consistently speak to, and ongoing creative and message testing will be conducted to optimize acquisition tactics and remove the barriers that remain for customers that might keep them from enrolling in CARE.

4.2.2.2 Targeted Paid Media

PG&E's CARE marketing and communications strategy seeks to maintain customer awareness and drive acquisition through a variety of targeted paid media channels such as digital display, search, TV and radio advertising.

Television and Radio Campaigns

Broadcast media tactics play a key part of PG&E's marketing strategy, working to increase the size of the overall targeted audience to encompass as many CARE-eligible customers as possible and maintain high awareness levels.

Data shows that low income households use the most media across both traditional and emerging media, with strong affinity for TV and radio formats.¹¹¹ Use of traditional media like television and radio will drive awareness and reach low income customers

¹¹¹ Nielsen. The Total Audience Report <http://www.nielsen.com/us/en/insights/reports/2015/the-total-audience-report-q3-2015.html>.

who may not engage with other tactics, such as those customers who may not spend considerable time online. Broadcast formats also provide an opportunity to combine strong storytelling techniques to create an emotional connection with the customer. This connection may make it more likely that the customer recalls the message delivered and takes action when they encounter other conversion-focused marketing tactics.

PG&E's television spots were created in 30 and 15 second versions, and produced in English, Spanish and Cantonese. The in-language spots were developed with culturally nuanced scripts to make the message more relevant and appealing to the audience. PG&E expects that inclusion of culturally recognizable visual and verbal cues will increase relevancy and appeal for the Hispanic/Latino and Chinese-speaking audiences.

PG&E plans to develop new radio spots to complement the TV campaign, leveraging the same creative strategy used in producing the TV spots, focusing on the opportunity to create an emotional connection with the listener.

As part of the efforts to deliver campaign integration, PG&E plans to include CARE television and radio campaigns during key time periods to align with seasonal campaigns to raise awareness of CARE as part of the overall rate options messaging hierarchy. See Section 5.3.3 for additional detail.

Targeted paid media buying is an important element of the broadcast plan as it allows for execution of more cost efficient campaigns. Unlike a large-scale, national broadcast media plan, the CARE media budget will focus on specific designated media areas (DMA) within PG&E territories that provide the best opportunity to reach the most CARE-eligible, non-enrolled customers. For example, the approach to the TV media buy may consider tactics such as:

- Purchasing media time using Comcast Spotlight to target specific portions of a DMA, such as certain neighborhoods or entire cities, to maximize media spending so the campaign will have maximum reach; and
- Buying Spanish and Chinese targeted time through local networks and stations to allow for negotiation of lower rates and added value opportunities such as Spanish and Chinese media interviews to discuss CARE.

TV and radio are also important channels to address hard-to-reach audience groups that may not be responsive to other traditional media channels like direct mail or

email.¹¹² These channels are a vital and irreplaceable resource to rural communities, providing them with entertainment and important news and emergency information they rely on each day. Media buying strategy uses CARE mapping tools to enable media partners and PG&E to more precisely target customers with a high propensity for CARE enrollment at the DMA level by leveraging Simmons panel responses¹¹³ from similar customers in the same persona group, as well as Geoscape data¹¹⁴ on ethnicity and acculturation (Spanish).

Always-On Digital Advertising

PG&E's plan will leverage an always-on approach to digital display and search engine marketing campaigns to support awareness and drive conversion for CARE. Utilizing an always-on strategy allows PG&E to engage with a significant number of our customers,¹¹⁵ where they already are, in the most cost effective manner. Digital display will use a variety of ad sizes with messaging in both English and Spanish. Digital media partners are selected that have strong capabilities to pinpoint new Hispanic/Latino (both English and Spanish speaking) customers and retarget visitors who have been on PG&E Spanish pages. For example, partners will serve ads to a user based on the audience insights of a customer whose digital profile indicate that they are likely to be Hispanic/Latino, or contextually on the websites that they frequently visit (on popular Spanish websites). Search engine marketing ads will provide an ongoing layer of media to further engage customers, and direct them to pge.com as they seek out more information.

Content and messaging for digital will focus on messaging strategies that are designed to address key enrollment barriers and will be regularly rotated across channels to drive momentum and to avoid message fatigue. Calls-to-action direct

¹¹² National Association of Broadcasters (NAB), Broadcast Television and Radio in Rural Communities, October 2012. http://www.nab.org/documents/advocacy/spectrumManagement/Rural_Communities_1012.pdf.

¹¹³ Simmons data is an annual survey of 30,000 consumers nationally, measuring 8,000 brands and 700 psychographic questions with 60,000 elements including all major media behaviors covering television, online, mobile, print, radio, social media and more.

¹¹⁴ Geoscape is third party data purchased and appended to customer data to help better understand PG&E customers' level of acculturation and language preference.

¹¹⁵ PG&E site data for January to May 2017 shows 40,000 average monthly visits to the CARE landing page.

customers to click to learn more and enroll. After clicking through from a digital advertisement, customers arrive at the CARE landing page on pge.com¹¹⁶ where the program guidelines are detailed and the customer is encouraged to enroll.

Digital advertising will be targeted via customer maps that highlight specific geographies and sub-segments of the audience. This will enable PG&E to maximize spend and efficiency, and will be closely coordinated with ESA and other energy management digital campaigns. For example, CARE advertising will be targeted to specific locations where penetration rates are below average for specific hard-to-reach groups, or where data shows there are a large number of non-responders.

Many forms of digital advertising will be used as part of a multi-channel approach including online video placement, display ads, search and social ad placements to increase overall customer reach and efficiency.

Another benefit of digital advertising is that it allows the opportunity to test different messages quickly and efficiently. In line with the test and learn approach, PG&E tests creative in both English and Spanish to determine which messages resonate better with a specific audience.

4.2.2.3 Direct Marketing Tactics

PG&E uses direct-to-customer marketing tactics like direct mail and email to target eligible, non-enrolled customers, driving response that ultimately results in program enrollment.

Multi-Touch, Multi-Channel Campaigns

In 2015, the CARE marketing team conducted testing to determine the optimal number of touches, channel sequence and cadence for CARE direct marketing campaigns that are deployed to drive consideration and acquisition. Results indicated that repetition of messages is critical. By increasing the number of times a customer received the marketing message, and specifically including a direct mail touch to customers who traditionally only received email, PG&E experienced a significant increase in the CARE enrollment rate.¹¹⁷ Lessons learned from this testing, as well as

¹¹⁶ pge.com/CARE.

¹¹⁷ Enrollment rates for eligible, non-enrolled customers increased from 3.9 percent in 2014 to 8 percent in the 2015 cadence test. Source: Targetbase CARE End of Season Analysis, November 16, 2015.

propensity model enhancements,¹¹⁸ were implemented in early 2016 and the campaigns continue to demonstrate strong enrollment rates.¹¹⁹ Therefore, PG&E plans to continue promotion of CARE via multi-touch, multi-channel direct marketing that targets priority segments to drive new enrollment.

These campaigns primarily include email and direct mail targeted to eligible non-enrolled and need-to-recertify customers who appear more likely to be income eligible for CARE based on PG&E's propensity model. The propensity model is organized into 10 deciles, or groupings, with the lower deciles being the most likely CARE-eligible, higher deciles meaning the customer is less likely to be eligible for CARE. Marketing lists are focused on deciles 1-3, but include some of deciles 4 and 5 only for records with an income flag below a certain level.

PG&E plans to continue to analyze ways to optimize the propensity model including exploring the impact of eliminating customers from deciles 4 and 5 from the direct mail lists. However, any adjustments to the model will be tested for efficacy as it is important to continue to ensure that PG&E isn't narrowing its criteria and limiting eligible customers from outreach.

After seeding the market via targeted paid media, multi-touch direct mail and email campaigns are delivered to drive customers to enroll. Campaign execution involves deployment of an initial email, followed by a second email a week later to those customers who did not open the first email. Approximately two weeks later, the customer will receive a direct mail letter package. This sequence of communications is repeated approximately seven weeks later, removing any customers from the list who have enrolled during that period.

The direct mail and email campaigns include several tactics designed to make the process easier for customers. The campaign offers multiple response options to allow the customer to respond to the offer based on their particular access preferences. For example, the direct mail package provides three response options: (1) mail-in

¹¹⁸ In Q1 2016 Targetbase appended new Personicx Cluster data and Geoscape. Acculturation data, creating a modeling universe with approximately 450+ variables representing customer characteristics.

¹¹⁹ Overall 2015 enrollment rate was 3.9 percent for eligible, non-enrolled CARE and 16.6 percent for customers who need to recertify (excludes cadence test results). Q1-Q2 2016 saw enrollment rate of 8.2 percent for eligible, non-enrolled customers and 28.9 percent for customers who need to recertify. Source: Targetbase CARE Mid-Season Analysis, June 21, 2016.

application; (2) online application; or (3) toll-free phone number. Additionally, the direct mail package includes a printed application with key customer information, like name, premise address and account number pre-populated to reduce the time required for the customer to complete the application.

Acquisition emails drive to the CARE landing page on pge.com where the customer can quickly apply online. Furthermore, the emails are mobile-optimized, so when they're opened on a mobile device, the customer will also see a button where they can click to respond and apply for CARE via a simple stream of opt-in text questions.

Event-Triggered Acquisition

PG&E plans to continue the year-round acquisition program executed through a partnership with its third-party vendor, Allconnect. Allconnect's Mover Program assists people who have recently moved to simplify the process of establishing services with energy companies, TV, Internet, and phone providers at their new residence. Allconnect uses geographic and segmentation data to identify customers who are likely CARE-eligible and offers CARE as an option. Customers who accept the offer can provide account information to be enrolled in CARE via phone with the Allconnect service representative or opt to have a follow-up email sent with more CARE information, and directed to a CARE landing page to complete the application process and enroll. This tactic is responsible for driving approximately 5,000 new enrollments annually.

PG&E will also investigate implementation of event-driven communications such as CARE application abandonment triggered emails. Currently the CARE digital campaign includes retargeting ads that are sent to customers that land on the CARE landing page but do not submit an application. PG&E plans to incorporate a short series of emails to recapture customers who start, but do not complete the application. These emails could be programmed to be sent at pre-determined time intervals to directly address potential issues customers may be having during the application process.

Bill Inserts

Bill inserts promoting CARE and Family Electric Rate Assistance (FERA) are included in the residential customer bill package several times throughout the year. The insert creative includes the CARE and FERA application, and are targeted to CARE-eligible customers. The timing of the inserts is planned to align with key seasonal

periods so that customers receive the message and application when additional marketing activity will increase overall awareness.

Additional Media Channel Exploration

PG&E intends to continue investigation of additional media channels and tactics for use in driving CARE acquisition. Some of the tactics that are being considered are newspaper or magazine inserts, door hangers, coupon stuffers, and outdoor advertising. New media exploration and testing will be integral to CARE planning, especially as further analysis and research are conducted to evaluate how best to extend marketing reach to the non-responder and hard-to-reach audiences.

Rate Comparison Personalized Test

PG&E is developing CARE Rate Plan Education Reports that will contain personalized energy usage information and demonstrate to eligible, non-CARE enrolled customers how much they would have saved if they were on CARE.¹²⁰ The goal of these reports is to break down the barrier that the CARE application process isn't worth the effort by showing households how much money they are losing each month by not signing up for the CARE discount. PG&E posits that demonstrating the personalized savings, coupled with a strong loss aversion message, will most likely produce higher conversion rates.

The Decision directed that "The CARE Rate Education Report should be combined with Home Energy Reports where possible to reduce messaging fatigue and reduce costs."¹²¹ PG&E has analyzed the potential of delivering the personalized CARE discount information through three existing communications:

- 1) Acquisition direct mail to CARE-eligible customers
- 2) Standalone Rate Plan Education Report
- 3) Home Energy Reports

It is PG&E's position that integration of the Rate Plan Education Report with acquisition direct mail would provide higher conversion rates than utilizing Home Energy Reports because the two former communications specifically address savings through rate changes while the Home Energy Report focuses on conservation via behavioral changes. PG&E's opinion is that the customer will be more apt to act if the integrated

¹²⁰ D.16-11-022. Ordering Paragraph per OP 105.

¹²¹ D.16-11-022. Ordering Paragraph per OP 106.

content is aligned versus requesting customers to focus on two separate actions – change a rate and change behavior.

A test plan will be developed to measure the impact of using the personalized Rate Plan Education Report as part of the overall acquisition message. Results of the test will provide insight to how this tactic could be operationalized in the future. PG&E is considering Q4 2017 to send out the CARE Rate Plan Education Report.

Non-Responder Research and Testing

If a CARE-eligible customer receives a direct marketing communication, but does not sign-up for CARE, they are considered a non-responder. In early 2016, PG&E performed an initial segmentation analysis as a first step to evaluate the opportunity to reach the over 893,000 CARE non-responders from CARE marketing efforts during 2015. Looking at the customers included in the analysis revealed the following:

- Thirty-eight percent of the CARE non-responders had received an email from PG&E in 2015 (not limited to CARE messages);
- The majority of the customers who received a PG&E email received 10 or more emails; and
- Sixty-eight percent who received an email opened at least one, and 15 percent clicked through to the web from an email.

Based on these interactions, PG&E perceives that the CARE non-responder customer base does engage with some of the PG&E messages. Therefore, there may be an opportunity to convert these customers to CARE Program participants if the right message or tactic were sent via the customer's preferred channel.

As discussed in Section 3.3.3.7, Areas of Opportunity for non-responders, PG&E plans to use additional segmentation and research to evaluate and prioritize the non-responder pool for in-market testing. By segmenting the non-responders, groups of customers with similar characteristics are created. Marketing can utilize the characteristics of the individual segments to prioritize the best opportunity for research and marketing testing. Characteristics can also be used to plan tactics, and communications can be tailored at the segment level to increase relevance.

Based on insights garnered from the research, marketing will look to develop test plans designed to evaluate effectiveness of various new messages, media channels and tactics. Results from these tests will inform future shifts in strategy that may be needed to motivate these customers to enroll in CARE.

4.2.2.4 Retention and Engagement

Beyond CARE customer acquisition efforts, PG&E seeks to retain existing customers and to encourage engagement with other tools, tips and programs most appropriate for low income customers.

Care Customer Welcome Experience

PG&E plans to continue to refine the CARE customer welcome experience, including a refresh of the existing welcome kit. The current welcome kit is sent to new CARE customers shortly after enrollment by direct mail or email. The welcome kit provides customers with critical information about the CARE discount program, including their CARE discount expiration date, how to read their bill, and why managing usage levels below 400 percent of baseline is a critical requirement for continuing their participation in CARE. The welcome kit also provides tips and tools designed to help customers better manage their energy use, such as how to read the energy statement and Bill Forecast Alert, and directs customers to get more personalized options by registering for an online account.

The welcome kit is a prime integration opportunity and will continue to be utilized to cross-promote the ESA Program and new energy management tools to low income customers. PG&E is revising the current welcome kit to augment integration tactics such as inclusion of a lead generation device for the ESA Program, directing customers to apply for ESA as the next step in their energy management journey. Content will also be updated with new no cost energy management tools such as Bill Forecast Alert, High Usage Alerts and the Home Energy Checkup.

Post-Enrollment Communications

Additionally, PG&E is assessing the value of developing a post-enrollment series of communications to address ongoing opportunities for low income customers to more efficiently manage their energy use. This series could keep low income customers more engaged and increase the likelihood of recertification. To determine whether or not this additional communication series is effective, PG&E will develop a testing plan to measure impact on customer experience, CARE retention, online account sign-ups, and engagement with other energy management programs and tools.

Recertification

As customers approach the recertification period, there are two campaigns currently in place to promote retention in the CARE Program: (1) auto-reenrollment, and (2) recertification reminders.

Auto-reenrollment occurs approximately 180 days prior to the expiration date for customers in deciles 1 and 2 of the propensity model. PG&E sends these customers notification via direct mail and email to alert them that they've been automatically reenrolled in the CARE Program and no further action is required by the customer to continue to receive the CARE discount.

For customers required to recertify, PG&E notifies the customer at 150-days out from the recertification date by automated voicemail. Starting at 120-days out, a recertification reminder campaign is initiated, and customers are notified by direct mail, email and automated voicemail. Recertification reminders are continued via email campaign at 90-days out, 60-days out and 30-days out.

Based on the fact that PG&E has seen the highest response from the 120- and 90-day emails,¹²² the marketing plans include consideration of the addition of a triggered text response option for customers who have indicated text as a preferred communication method.

During the CARE enrollment period, customers may be selected to participate in the PEV process to verify household eligibility. Customers are selected for PEV based on the following:

- Customers with a decile score of 9-10
- Customers with high usage (+400 percent of baseline)
- Approximately 1 percent annual random selection

Customers selected for PEV receive different direct mail letters depending on whether they are required to go through the standard PEV or the High Usage PEV process.¹²³ The included letter details the requirements, instructions for completion and required forms.¹²⁴ In order to continue receiving the monthly CARE Program

¹²² 2016 CARE Recertification Metrics reporting for unique open rates and unique click-through rates.

¹²³ See Appendix 6 for CARE High Usage Post-Enrollment Verification and Appeals process.

¹²⁴ A portion of standard PEV customers will receive a live phone call as outlined in the Community ambassadors section above.

discount, the customer must provide requested documentation within 45 days. Customers who do not respond, or do not meet stated requirements will be removed from the CARE Program and are prohibited from re-enrolling for 24 months or until they demonstrate compliance with the stated requirements. In accordance with the Decision,¹²⁵ PG&E was required to include categorical enrollments to allow a customer to remain eligible and on the program. As such, PG&E will update the standard PEV process to request income verification and/or categorical enrollment verification.

PG&E plans to continue to monitor customer feedback and PEV completion rates on an ongoing basis, and evaluate opportunities for potential improvements to the customer experience.

Community Ambassadors

The Community Engagement team accompanies PG&E's CARE marketing efforts by addressing key insights and developing strategic partnerships and innovative ways to keep enrolled customers on the CARE Program. A key insight observed in 2014 was a 52 percent drop in CARE customers due to customer non-response in the standard PEV process. Because enrollment in the program is a self-certification, the CARE standard PEV process flags a random sample, around three percent, of CARE customers each month to verify their eligibility in the program. The standard PEV process is as follows:

- Direct Mail: CARE standard PEV letter mailed, customer has 45 days to respond to PG&E with documentation of eligibility; and
- Automated Voice Message: Reminder phone call made to customer between day 15 and 20.

The Community Ambassador Program adds a live agent phone call reminder from a CBO staff member to customers who do not respond to the PG&E's direct mail letter and automated voice message. The program also provides customer assistance to complete the standard PEV documentation. This allows for a community representative to provide in-language assistance to complete standard PEV documentation, addressing a finding from the 2016 LINA study that states PEV documentation may be

¹²⁵ D.16-11-022, p. 285.

ignored if customers do not understand the language.¹²⁶ Therefore, the standard PEV process for the pilot was updated as follows:

- Direct Mail: CARE standard PEV letter mailed, customer has 45 days to respond to PG&E with documentation of eligibility;
- Automated Voice Message : Reminder phone call made to customer between day 15 and 20; and
- Live Phone Call: Community Outreach Contractor staff member makes live in-language phone call between day 25 and 35, three attempts are made to contact the customer.

The program was piloted with five Community Outreach Contractors in four counties with the highest non-response rates: Sacramento, Alameda, San Francisco and Fresno. The program launched in July of 2016 and is planned as a two-year pilot through July 2018. As of December 2016, out of the customers who did not respond to the letter and automated voice message, PG&E has seen a 29 percent response rate between August and December 2016, meaning 984 customers out of 3,383 customers responded to PEV documentation after being contacted by a CBO staff member and as a result, remained on the program. If it were not for the live agent phone call from the CBO, these 984 customers would have otherwise been dropped off of the CARE Program.

Effective June 1, 2017, in addition to income verification, categorical enrollments also allow a customer to remain eligible and on the program. As such, the standard PEV letter is being updated to request income verification and/or categorical enrollment verification. The Community Engagement team will ensure that Community Ambassadors are aware of how to walk a customer through this additional way to stay on the program if flagged for standard PEV. In addition, in Q4 of 2017, the Community Engagement team will explore the possibility of adding High Usage PEV assistance to the Community Ambassador Program. If it is plausible to add High Usage PEV, the Community Engagement team will explore adding this service to the program beginning in 2018. The plausibility of adding High Usage PEV to this program will be studied based on cost and administrative feasibility.

¹²⁶ 2016 LINA Study, p. 125.

4.3 ESA Marketing Plan

4.3.1 ESA Marketing Strategies

ESA awareness and home participation rates are already high, so PG&E's primary focus is to market the program to eligible customers living in homes that have not yet been treated by the ESA Program. With the lifting of the Go-Back Rule, strategic approaches will be developed to reach customers who live in homes that are eligible for updated treatment, whether or not the current resident was in the home during the original treatment. While the willingness to participate factor must be considered with the remaining audience, customers can be acquired into the program by using marketing strategies that directly address specific barriers to participation, as referenced in Section 3.3. Looking to 2020, ESA marketing will evolve around three key strategies:

- 1) **Drive participation through cost effective, targeted campaigns and always-on marketing that aligns with our customers' needs.** Customers who are skeptical of the ESA offer or believe that it's not for them may require additional marketing touches across a variety of channels before they're motivated to respond. PG&E intends to offer ESA across a variety of channels, providing a number of opportunities to raise their hand via their preferred response channel.
- 2) **Continue to position ESA as a way to extend energy savings efforts among CARE-enrolled customers.** Introducing ESA at key moments in the CARE-enrolled customers' experience can reinforce the relevance of the offer to the particular households. Customers who previously passed up the offer may take advantage when they're engaged and it's bundled with another event such as recently moving or completing the CARE PEV process.
- 3) **Ensure that responding is simple and quick.** A barrier to ESA participation is the concern about the time it takes to participate in the program. While much of this barrier is focused on the home treatment process, PG&E would like to reduce any barriers that may exist during the hand-raising phase. It should be easy for a customer to register their interest and then make their way through to scheduling a home assessment. Further, PG&E will continually evaluate ways to provide transparency around the home treatment process in messaging and communications to effectively set and manage customer expectations as they respond to the ESA offer.

PG&E will continue to employ a number of strategies that leverage drivers and address barriers specific to ESA Program participation.

Messaging shall be empathetic. PG&E understands that making EE home improvements can be expensive and beyond the constraints of some household budgets. Copy points and associated creative will radiate a comfortable and safe home, highlighting common home improvement measures offered through the ESA Program.

Creative shall reflect the diversity of PG&E customers and the variety of homes that are eligible, including single-family homes, apartments and mobile homes. Customers should be able to envision their household and living space receiving the benefits of ESA Program home treatment, especially those customers who feel that the program is not for them or believe that there is no need to upgrade their home.

Customer testimonials could serve to normalize the program, bringing the benefits of the program to life and evoking the feeling of word-of-mouth referrals from neighbors or friends. This messaging strategy leverages the types of referrals that are proven¹²⁷ to generate interest in ESA and moves real customer experiences to the foreground to combat skepticism about a free offer.

Simple step-by-step guidance about the home treatment process can level set expectations about what participation involves, so each lead generated is more likely to participate all the way through to full home treatment and the associated inspections. Additionally, providing a way for customers to verify participating contractors can assuage concerns about letting a stranger into the home.

Personalized messaging, such as copy points directed to particular hard-to-reach groups, could emphasize the reasons they should consider participating. For instance, overcoming the hesitations felt by renters may include copy points about renters' eligibility and common measures that they may especially appreciate given that they do not own the space, such as lighting changes, faucet aerators, and appliance repair and replacement. Again, bringing in testimonials from other renters who have found the program beneficial will help renters envision the benefits to their own particular home.

Bringing attention to the reason the customer is receiving the communication feels more personal. PG&E will continue to look for ways to highlight that the customer is

¹²⁷ 2016 Low Income Needs Assessment for the Energy Savings Assistance and the California Alternate Rates for Energy Programs. Prepared by Evergreen Economics. December 15, 2016. CALMAC ID: SCE0396.01. Pages 112, 120, 123, and 135.

receiving the offer because they are income eligible due to their participation in CARE, and that the program benefits are theirs to take advantage of. PG&E will also explore opportunities to include additional factors that triggered the offer such as having just moved to a new home that is eligible for ESA treatment or that their landlord is treating the common areas of the building and we want them to be aware that they can get their apartment treated. Such examples can help overcome a customer’s belief that they may not be eligible to participate.

Loss aversion messaging will be tested with non-responders. Introducing messaging that positions an offer as mitigating a loss instead of receiving a gain may help convert customers who have not responded to previous tactics. An example might be changing a headline from “Give your family year-round comfort with no cost home upgrades” to “Don’t miss out on free home upgrades for your family.” This change in position may incentivize customers to take action.

**TABLE 4-2
ESA MESSAGING STRATEGIES FOR BARRIERS**

ESA Audience Segment	Barrier or Concern	Emotional Driver	Messaging Example
CARE-enrolled customer	Skeptical of free offer	“The discount is nice, but how can I lower my bill even more?”	ESA provides home improvements at no cost to you to help keep your home more energy efficient, safe and comfortable.
Renter	Unsure if treatment is available for rental units	“I don’t have a lot of control over upgrades to my rental unit.”	Renters can participate, too! PG&E can share program benefits with your landlord so your home can receive a full energy efficient upgrade.
Non-responders	Unsure about eligibility; may investigate later	“I wonder if this would work for me, but I’m not sure if I have time right now to find out.”	Don’t miss out on free home upgrades for your family. Send in the attached response form today.

While the focus of the messaging strategy is on the specific phases of awareness and acquisition, PG&E is looking at more specific phases of messaging that will help customers move along a customer journey from awareness to willingness to engage, learning more, applying and following through the home treatment process.

4.3.2 ESA Strategies and Tactics

4.3.2.1 Targeted Paid Media

According to the 2013 LINA study,¹²⁸ ESA awareness among low income households is high at 68 percent, particularly when prompted with a program description. Despite this high awareness, low income customers tend to move more frequently and also have a number of concerns and offers competing for their attention.

Therefore, it's important to work diligently to maintain or improve current awareness levels. To that end, PG&E will seek to surround customers with the ESA offer through a variety of channels.

PG&E offers ESA to CARE-enrolled customers to help them better manage their energy use. Campaigns utilizing channels such as digital and search, radio, and print advertising will reach customers who may be hard to engage via traditional, targeted outreach methods such as direct mail.

Digital and paid media campaigns will continue to leverage customer data mapping to reach low income customers in areas with lower ESA participation rates and/or with a significant population of hard-to-reach groups, including customers whose preferred language is not English. PG&E will continue to seek opportunities to present the ESA offer in-language, such as in ethnic media. Overall, the designated market areas with the most opportunity for ESA participation are San Francisco, Sacramento and Fresno.

PG&E will also explore ways to serve local messaging to customers via digital advertising and social media. Campaigns targeting specific zip codes with higher numbers of potential customers and low ESA penetration could include headlines referencing the town or neighborhood as a way to capture customer attention and evoke the feeling of neighborhood word-of-mouth referrals. Local messaging can also highlight particular reasons a customer may benefit from ESA in that area, such as a run of hot weather or a particularly cold winter. ESA specific digital campaigns will be carefully coordinated with CARE campaigns and always-on energy management campaigns.

¹²⁸ 2013 Low Income Needs Assessment for the Energy Savings Assistance and the California Alternate Rates for Energy Programs prepared by Evergreen Economics. December 16, 2013.

4.3.2.2 Direct Marketing

ESA M&O efforts are designed to generate leads (customer interest) for program subcontractors' acquisition efforts. Ideally, each lead results in a home assessment and treatment (customer acquisition); however drop-offs do occur on the path to conversion due to factors such as household eligibility, willingness to participate, and non-response to contractor follow-up calls. The success of each campaign includes an evaluation of response rates, home assessment rates, and the rates of full home treatment.

Direct Mail and Email

Direct marketing efforts have been the most effective at generating qualified leads. These efforts, such as direct mail and email, are personalized and highly targeted, directed to CARE-enrolled customers living in ESA-eligible homes.

As referenced in Section 4.1.3.2., PG&E has developed a propensity model that scores customers based on their likelihood to participate in the ESA Program based on 27 different predictive variables including behavioral, demographic, and premise attributes. Applying the propensity model ensures that marketing efforts and funding are precisely directed to customers who show the highest propensity to respond.

PG&E will prioritize marketing outreach in areas with lower program participation, higher numbers of remaining homes to treat, and with significant populations of hard-to-reach groups such as customers in rural or high poverty areas. Particular areas of opportunity include Mendocino, Marin, San Mateo, Sacramento and Lake counties.

Renters participate in PG&E's ESA Program at a good rate (54 percent of ESA treated homes in 2016 were occupied by renters), though we will continue to monitor the response from this hard-to-reach group and explore additional ways to engage customers who may believe that only homeowners can take advantage of this program. Renters in MF properties may benefit from strategies to connect with owners of deed-restricted properties with low income households. Building owner or landlord buy-in can help alleviate some of the barriers to ESA participation such as fear of making even small upgrades to a home one doesn't own.

Direct mail continues to be the workhorse of PG&E's ESA marketing strategy, traditionally generating the most qualified leads. The package contains a personalized letter and a partially pre-filled application with return postage. The control letter highlights common measures and underscores the benefits of ESA participation. Using the control as a base, PG&E can then test additional messaging particular to target

audiences (e.g., renters) and/or integrate with other proceedings, such as Residential Rate Reform. Seasonal messaging and other motivators such as changing rates may provide the messaging backdrop that positions ESA as a tool to help the customer manage their energy use. This is also a chance to connect emotionally with the customer, specifically on common desires for a comfortable home, peace of mind, and the potential for monetary savings.

Email response has traditionally been lower than direct mail, though PG&E continues to explore ways to use email as a cost effective standalone tactic or in conjunction with other tactics to boost campaign response rates. PG&E is testing the use of email to boost direct mail response by emailing the customer a few days before they receive the direct mail package, with a follow-up email sent shortly thereafter, as a reminder to act. The relative low cost of email campaigns may also provide an opportunity to test local or specialized messaging to smaller target audiences.

Channels of Choice

PG&E aims to prioritize customer-reported channel preferences, as well as consider how and when the customer is engaged with the utility. Offering ESA at strategic points in the CARE customer experience will align with the priority audience targets as discussed in Section 4.1.3.2, as well as connect with the customer at a logical time when they're thinking about their utility and the benefit they receive from CARE. Examples of those touchpoints are when the customer enrolls in CARE, completes the PEV process and/or moves to a new ESA-eligible home. Integrated messages, such as including a compelling and personal ESA offer within the CARE welcome kit, and triggered communications, such as a direct mail package triggered by PEV completion, are of high interest to PG&E in an effort to tie the program offering directly to a period of engagement.

Channel preference is also considered when targeting specific hard-to-reach populations. For instance, traditional marketing channels may be used to target Seniors or customers with disabilities. Media consumption habits of a particular region may be considered when trying to reach areas with lower penetration rates.

Bill Inserts

Bill inserts provide another way for increasing ESA Program awareness and participation among CARE-enrolled customers, presenting the offer of home upgrades

during a transactional moment with PG&E—and perhaps one of the few times in a month when a customer is actively considering energy management.

In 2015 and 2016, PG&E deployed a pre-paid mail-in application bill insert to CARE-enrolled customers. While this tactic generated a strong response and likely served to increase program awareness, it contributed a lower conversion to ESA home treatment, resulting in a relatively higher cost-per-acquisition when considering return postage and application processing fees. PG&E is currently testing a bill insert driving customers to apply online at pge.com, reducing application processing costs. Added benefits of this approach include the opportunity to provide customers with more information about the ESA Program online and a mechanism to share seasonal energy savings tips and tools and other program offerings. PG&E will evaluate the current test results and adjust strategies, timing, and cadence to optimize the use of energy statements.

PG&E would also like to market the ESA Program to CARE-enrolled customers who pay their bill online and do not receive a paper energy statement using the online account dashboard. Planning has begun to allow customers to submit an ESA response form while logged into the online account and subsequent promotional opportunities will be explored.

4.3.2.3 Cooperative Marketing

PG&E is considering a number of ways to enhance the partnership with ESA Program subcontractors through cooperative marketing initiatives and the warm transfer of leads.

Efforts have begun toward identifying customers in high-priority groups including CARE-enrolled customers overall, and those that are identified as new CARE customers, high usage customers, recently moved, on the program six or more years, and those who have gone through the PEV process. Along with identifying the customers, PG&E is looking for additional opportunities to share insights with subcontractors about key customer groups, such as the percentage of renters versus homeowners, language preference and engagement with other programs and tools.

PG&E is also investigating ways to share direct marketing touchpoints and the associated creative more effectively with contractors, providing a clear view into the number of PG&E marketing touchpoints the customer has received and which one the customer responded to. Doing so provides a seamless warm transfer from PG&E to the

subcontractor and allows them to tailor their follow-up communications. In addition, PG&E will continue to monitor and look for ways to increase the home assessment rates of customers who've registered their interest in the program. Optimizing the path from lead generation to customer acquisition is of critical importance.

PG&E will also continue to support contractor acquisition efforts via PG&E-branded materials and collateral, such as door hangers, flyers, postcards and brochures. Materials for energy education modules—including residential rates education—will also be provided directly by PG&E. All of these efforts combined are aimed at supporting subcontractors' customer acquisition and education efforts.

4.3.2.4 Multifamily Whole Building Approach

As discussed in Section 2.3.5.3, PG&E continues to conduct outreach to tenants in MF buildings and is implementing new programs to help ensure that the whole building is treated to drive the greatest energy savings. Campaign targeting will continue to include customers who live in MF buildings, as well as messaging aimed at renters and customers with smaller energy burdens.

The new SPOC and Common Area Measures initiatives will provide new opportunities to connect with the building owner, directing them to a suite of programs that could benefit the whole building, including individual tenants' units. PG&E will ensure that the SPOC is able to successfully explain the benefits of the ESA Program to building owner in order to have their assistance in referring tenants or approving the treatment of all units.

Renters can be cautious about ESA treatment, with concern about changing something that they don't own, the potential for rent increases, or even merely reaching out to their landlord with whom they may have little to no contact. The new SPOC and Common Area Measures initiatives provide the opportunity to reach many customers at once, with the approval of the landlord or building owner from the very beginning. As these new programs are implemented, PG&E will adjust and monitor campaign targeting. If building owners are in the position to opt tenants into ESA home treatment then marketing efforts can focus on other remaining customers.

4.4 Tribal Outreach Planning

PG&E will continue to leverage a variety of resources to develop its Tribal Outreach Plan including benchmarking and consultants who are experts in tribal insight, culture,

M&O. For PG&E's CARE and ESA M&O Plan, PG&E engaged Shannon Hulbridge, Chief Executive Officer of Redbridge Inc., a tribal consulting and engagement firm for insights and strategy development. Please refer to Appendix 7 for Shannon Hulbridge's biographical statement.

Communications Insights

Understanding cultural differences to engage with tribes and tribal programs is key, as community values and unique cultural attributes may impact or drive decisions and tribal engagement.

- Partnerships inside and outside the tribe are based on trust and often take years to fully develop.
- Despite economic difficulties, many tribal members will choose to preserve traditional philosophies and ways of life before economic prosperity.
- Tribes prefer to receive information and be allowed time to make a decision.

The FCC reports that 63 percent of Americans living on tribal lands lack access to broadband.¹²⁹ Tribes within the PG&E service territory largely reflect the National percentage. For those areas with access, affordability serves as a second obstacle. Low income families may opt for the lowest data streaming mobile phone packages and often pay-as-you-go plans, and so restrict data usage to staying connected with friends and family, social media, and tribal-focused websites.

Additionally, mass-market messaging may not be as effective among tribal audiences, who want to know that organizations and brands have shown an interest in doing business with tribal communities including an interest in the culture, needs and well-being of native communities.

Engagement Approach

With many Native Americans in PG&E's territory and many qualifying as low income, there is a clear need for low income programs among tribal communities.

Step 1: Build relationships and buy-in with tribal leadership and agencies.

PG&E will first assess which tribes within its service territory will require a third-party to establish relationships in a particular tribe. PG&E will seek to engage and establish

¹²⁹ Federal Communications Commission. 2015 Broadband Progress Report. February 4, 2015. <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/2015-broadband-progress-report>.

relationships and program support from tribal leadership and affiliated agencies. As elected officials known to be acting in the tribes' best interest, obtaining Tribal Council support ensures associated tribal contacts will be made accessible and aware of the programs. Methods to build these relationships may include: Tribal-specific pge.com pages, Tribal Council and in-person meetings and presentations, direct outreach and mailers.

Step 2: Facilitate awareness and education with influencers.

After obtaining tribal council and leadership support, PG&E will work with key tribal staff known to influence and drive community involvement. These would be tribal program department supporting energy, housing, social services, as well as tribal office and social media managers. Influencer strategies have been successful in other areas of tribal engagement including the California Rural Indian Health Board's Health Services programs and the Portland Area Indian Health Services programs, which target health staff and tribal leadership. Methods of engaging influencers may include: in-person and online training, community program brochures, social media toolkits, and case studies.

Step 3: Drive awareness and enrollment with tribal community.

Once influencers have been trained on how to communicate and answer questions about the program, PG&E or a consultant will engage directly with tribal communities to drive enrollment. This method has proved successful with programs such as the Inter-Tribal Energy and Tech Tour student awareness project (facilitated by Redbridge, Inc.) as well as the Department of Energy's Indian Energy Policy and Programs and is best suited for this community, where relationships and trust are critical to engagement. Methods of engagement may include tribal radio station public service announcements, PR, social media, tribal newsletters and tribal events.

Socialization and Feedback Loop

PG&E understands that building a sustained tribal-utility relationship is critical to driving participation in the low income programs. PG&E will solicit feedback from tribal constituents on the best ways to continue the ongoing relationship.

Next Steps in Tribal Planning

PG&E is engaging consultants experienced in tribal engagement to conduct market analysis and research specific to its service territory, with the goal of selecting up to

three tribes to engage with in early 2018 using the above approach. Tribes may be in metro or rural areas, with or without the infrastructure of a casino. Limiting the scope of early engagement will allow PG&E to cultivate relationships with the tribal leadership, agencies and influencers in order to deliver the best service to the community. PG&E will leverage lessons learned from outreach in 2018 to inform future tribal outreach engagements.

4.5 Fully Integrated Marketing Plan

PG&E's integrated marketing approach is intended to create a unified and seamless experience for our customers to interact with the programs and tools available to support their energy management journey. This section provides more details on strategies that both drive awareness of CARE and ESA and take customers further along their energy engagement journey, including:

- Always-on digital campaigns to drive ongoing awareness and engagement opportunities for our customers;
- Hyper-local paid media to drive deeper engagement in low income programs within a specific location;
- Highly visible seasonal marketing encouraging engagement in energy management during critical, high bill times; and
- Trigger based outreach including high bill seasons and at key points in the CARE and ESA journey, for example a customer has enrolled in one of the low income programs or has gone through the CARE Program PEV process.

Over the next four years PG&E will continue to evolve these strategies and tactics based on ongoing in market results in an effort to continue customers down a path of greater energy management.

4.5.1 Drive Awareness of Holistic Energy Management Tools Through “Always-On” Campaigns

PG&E's digital campaigns will be fully integrated to provide low income customers with awareness of holistic solutions to help them manage their bill. The specific items that PG&E plans to promote to customers are:

- 1) Create an online account on pge.com
- 2) Sign-up for CARE and ESA
- 3) Complete a rate analysis and change rates as appropriate

- 4) Take the Home Energy Checkup
- 5) Sign-up for Bill Forecast or High Usage Alerts
- 6) Adopt new, positive energy behaviors.

4.5.2 Drive Deeper Engagement Through Hyper-Local Campaigns

PG&E plans to evolve marketing outreach by testing a hyper-local targeted approach to reaching the remaining non-participating customers. Hyper-local strategies typically use digital display and email to cost effectively target customers who have the highest likelihood of eligibility in a program—in this case, CARE and ESA. PG&E will leverage zip-code level program participation data and creative campaigns tailored to the neighborhood or area being targeted in order to present a more resonant message to the customer living in that area. Deploying a hyper-local digital campaign to a rural community in a hot climate during the summer months using creative concepts that speak directly to the customer’s experience may resonate more deeply and motivate the customer to take action. This is another example of targeting the right customer at the right time with the right offer.

The first phase of the test will likely focus on two markets: San Mateo and Lake counties; reaching areas of both rural and urban populations. This test will provide valuable insight into how customers respond to media and messages in these regions and provide insight on rural audiences, which are a hard-to-reach population. Low income customers in these areas are high Internet consumers (most often on mobile devices), search frequently between both desktop and mobile devices, and also utilize social media (Facebook, primarily).¹³⁰ Within the identified counties, there is a distinct Hispanic population, which may warrant acculturated creative and/or Spanish-language messaging.¹³¹

Through each of these channels, a distinct, “one-to-one” approach will be activated by mapping current CARE and ESA participants and prospective participants to more precisely identify hyper-local areas of opportunity, minimizing media “waste” as only intended customers are being targeted. This supports PG&E’s strategy to surround

¹³⁰ Commspoint Journey – Pointlogic Media.

¹³¹ <https://www.common senseadvisory.com/AbstractView/tabid/74/ArticleID/8057/Title/CantReadWontBuy/Default.aspx>.

customers with messages, so they may see multiple forms of messaging (direct mail, broadcast, digital) which enables repetition and eventual action.

By understanding how low income customers consume media and using those outlets to target at this level of granularity, we become more efficient with digital media buying best practices (across display, mobile, search, and Facebook) to create a cost effective method of engaging these customers and moving them from awareness to action.

4.5.3 Residential Digital Newsletter: Drive Engagement Through Repetition and Engaging Content

PG&E will leverage its mobile-optimized residential digital newsletter to drive awareness of holistic energy management tools. 1.9 million customers receive the digital newsletter on a monthly basis. Approximately half of the audience includes CARE customers, customers who have treated their homes with the ESA Program, and customers who have been identified as CARE-eligible.

PG&E's newsletter content strategy is based on providing compelling, timely and beneficial information to low income customers based on customer insights and testing over several years. The newsletter serves up engaging content to drive awareness and participation in the low income programs and energy management tools by providing useful, actionable information. This is particularly important for low income customers who have minimal time to engage with PG&E and therefore need information organized with the more straightforward actions at the forefront.

To further maximize engagement, PG&E develops the content using the following three techniques:

- 1) Highlighting seasonal and/or themed messaging (e.g., holidays, summer vacations, tax season);
- 2) Leveraging audience interests; and
- 3) Including interactive features such as quizzes, infographics, and videos.

An example of how this presents itself can be seen with a low income version delivered in spring 2017 that included the following content:

- 1) Useful articles on how to maintain your appliances and prepare for summer savings;
- 2) A quick do-it-yourself video on how to easily lower energy costs;
- 3) A quiz on electrical safety; and

4) CARE Program offer.

Another way PG&E has begun driving greater engagement is with enhanced personalization through dynamically populated content based on a customer's demographics or pre-existing program status. An example of this functionality is incorporating a CARE customer's recertification date and serving up specific content related to their CARE recertification during that time period.

PG&E regularly reviews and optimizes the newsletter based on customer engagement with content. In Q1 of 2017, PG&E saw a significant increase in engagement with the low income version of the newsletter, and the most highly engaged content was centered on cost savings for customers. Specific content that performed well included articles on reducing winter energy bills while maintaining home comfort, tax tips for low income customers and spring cleaning tips to save energy and money.

PG&E will continue to evolve its newsletter content strategy as well as promote low income programs. Program promotions underway or in consideration for 2017 include:

- Low income program promotion: Cooling Centers, CARE, LIHEAP, REACH, and ESA Program promotions; and
- Energy Management and Budgeting Tools and rate plan options: Home Energy Checkup, Bill Forecast Alert, and the Rate Plan Comparison Tool.

4.5.4 Capitalize on Seasonal High Bills to Engage Customers in Energy Management

PG&E will continue to amplify low income marketing during the summer and winter. Seasonal campaigns serve as semi-annual reminders to customers to engage, conserve and adopt positive energy behaviors in an effort to mitigate large swings in their bills at a time when they are most receptive to taking action to lower their bills. These campaigns will be fully integrated and in low income customers' preferred channels presenting a variety of low or no cost tips and free tools to help them manage their bill. To read more details about these seasonal campaigns, please visit the Regulatory Integration Section 5.3.3.

4.5.5 Trigger Outreach to Customers at Critical Points in the Customer Journey

Throughout the CARE and ESA customer journey, PG&E will seek to nurture the relationship with ongoing communications that facilitate interaction with additional

programs and tools that may benefit the low income customer. These communications may be delivered across multiple channels such as direct mail, email and web.

PG&E's customer journey mapping (see Appendix 5) suggests that newly enrolled CARE and ESA customers may be feeling more positive about PG&E and therefore, may be receptive to messages from PG&E that are related to additional savings opportunities. As such, PG&E's marketing plans will leverage this important integration point by implementing trigger campaigns to take advantage of key occasions immediately following application and enrollment actions.

4.6 Support Channels and Community Outreach Plan

PG&E leverages a variety of channels to support its overall marketing strategies. These opportunities serve to:

- Drive further awareness by amplifying messages through CBO contractors, employees and the media.
- Assist customers with low income program enrollment and provide personalized information to help customers understand and manage their energy use, via CBO contractors, ESA contractors, CSRs, events and local office staff.
- Allow PG&E to deliver geographically targeted messages through community engagement efforts.
- Support hard-to-reach customers in their language of choice through PG&E's media relations, community engagement efforts, contact center, and website.

4.6.1 Community-Based Outreach

PG&E's community engagement and outreach strategy focuses on building trusted community relationships and strategic partnerships with the goal of informing PG&E's customers of assistance programs, resources, tips and tools. As a channel, community outreach enables PG&E to help a diverse set of customers understand and manage their energy usage, including understanding rate plan changes and utilizing tips and tools. Community outreach efforts can be a highly effective means to engage and gain the trust of customers who might otherwise disregard PG&E's messages. To develop its approach to energy management, PG&E engaged its Communities of Color Advisory Group, consisting of CBO and faith-based leaders across the service territory, to advise the company on metrics, reporting cadence and evaluation expectations.

Complementing PG&E's multi-touch approach, our community engagement efforts are critical to providing energy education to our hard-to-reach customers. The communities served by these CBOs include, but are not limited to African American, Asian-Pacific American, Cambodian, Chinese, Hmong, Japanese, Korean, Hispanic, Lao, Native American, Russian, Vietnamese, Disabled, Seniors and Veterans. The primary in-language support for customers is in Spanish, Chinese, Vietnamese, Tagalog and Hmong. However, many CBOs also provide support in: Burmese, Cambodian, Hmong, Japanese, Korean, Lao, Tagalog, Taiwanese, Thai and Russian.

Community partners complement traditional marketing tactics with one-on-one direct interaction with hard-to-reach customers and utilize the following channels including, but not limited to:

- 1) Face-to-face awareness at a CBO or other trusted location and education efforts with impacted customers through Community Outreach Contractors and Health Outreach Workers.
- 2) Community workshops through Community Outreach Contractors, Health Outreach Workers and Energenius® family engagement activities.
- 3) Door-to-door campaigns within a respective community, reaching a customer at their home, through Community Outreach Contractors and Health Outreach Workers.
- 4) Outreach through churches and other faith-based groups through Community Outreach Contractors.

The primary goal of CBO outreach is to drive participation in low income programs, mainly CARE and ESA. Additional low income assistance programs promoted by CBOs include:

- 1) Medical Baseline
- 2) Budget Billing – monthly bill averaged out to allow you to budget your energy costs and eliminate big payment swings
- 3) REACH – one-time payment assistance for qualified customers
- 4) LIHEAP
- 5) FERA

In addition, CBO outreach will also focus on driving awareness and engagement with energy management tools, including making rates more understandable and providing customers with rate plan options. CBOs will educate customers on becoming

better energy managers and providing the resources, tools and tips for customers to make the right decisions for their household. Discussion can include, but are not limited to:

- 1) Online accounts – customers can sign-up and request specialized bill formats (such as Spanish, Chinese or large font).
- 2) Bill Forecast Alert – customers can choose to be notified when their bill is forecasted to reach a certain dollar amount.
- 3) High Usage Alerts – customers can receive an alert when they may be close to reaching 400 percent of baseline.
- 4) Rate Plan Comparison Tool – customers can log in to their accounts and view a comparison of rate plan options.
- 5) Home Energy Checkup – customers can log in and answer a few basic questions about their home and lifestyle habits in order to receive a list of personalized, suggested improvements from PG&E.
- 6) Providing education on low or no cost behavioral tips to help customers manage their energy.

Customers will receive personalized support on the topics listed above, as well as bill education and answers to questions on energy management or low income programs. The types of organizations that PG&E partners with range from non-profit organizations, advocacy organizations, food banks and public assistance agencies. These programs include:

- CARE COCs
- Health Outreach Workers
- After-school based curriculum (Energenius)

4.6.1.1 CARE Community Outreach Contractors

The CARE Community Outreach Contractor Program has been implemented since 2001 to educate and enroll eligible residential customers into the CARE Program. PG&E's goal is to increase CARE enrollment among those communities that are hard-to-reach and have the lowest penetration rates.

PG&E contracts with CBOs, institutions, and other agencies to conduct grassroots community-based outreach. The types of CBOs PG&E partners with include non-profit organizations, advocacy agencies and faith-based organizations, ranging in issue areas including, but not limited to, housing, employment, food/nutrition, and immigration.

These CBOs engage their respective communities through one-on-one and face-to-face client services, workshops, community events and/or by going door-to-door.

Performance-based contracts are awarded to organizations that wish to receive compensation from PG&E on a per-application basis. PG&E currently pays Community Outreach Contractors the maximum \$20 per CARE new enrollment.

Beginning in 2016, the Community Engagement team started providing four annual regional trainings in the first quarter of the year, providing contractors multiple opportunities to be trained or refreshed on the CARE Program, as well as the ESA Program and other assistance programs. In 2017, the Community Engagement team enhanced the training sessions based on insights gleaned from research on CBO training processes and training materials.

The main takeaways from the research were to consider the time and attention of CBO staff and limit the amount of training content into critical, helpful information as CBO clients cannot digest a long list of overwhelming information. Due to these findings, training was reduced from four to two hours and training modules were simplified. The training topics in 2017 covered the following topics:

- CARE
- ESA
- Medical Baseline
- Introduction of four key rate resources: Rate Choices, Bill Forecast Alert, Budget Billing and Home Energy Checkup

The Community Engagement team continues to optimize its training materials while developing mid-year refresher training for CARE Community Outreach Contractors. In addition to the content described above, new materials will provide programmatic highlights or any changes for CARE, ESA, REACH, LIHEAP, Medical Baseline and Solar Choice. Moreover, CBO staff will be provided with PG&E energy statements and instructions on how to help a customer understand them. Most importantly, the mid-year refresher training will utilize specific customer scenarios in order to have a more interactive session with CBO staff. The purpose of the scenarios is to highlight rate change resources and assistance programs available, making the training that much more relevant to what CBOs experience in the field.

4.6.1.2 Health Outreach Workers

PG&E continues to work with community health outreach workers in the Spanish speaking community through our partner, *Vision y Compromiso*, to address communities that have LEP. These health outreach workers, known as *promotoras*, go door-to-door as well as conduct outreach in community gathering places like neighborhood grocery stores. They deliver a culturally and linguistically specific community engagement model that provides community-based health outreach workers with relevant training and support to increase Latino families' awareness of and enrollment in PG&E's low income portfolio of programs. Though the outreach focuses on primarily the CARE and ESA programs, the health outreach workers also enhance Latino families' knowledge on energy management education and bill savings.

Health outreach workers supported PG&E by promoting low income programs in Alameda and Yolo counties in 2016 which will continue in 2017. Outreach activities undertaken by this group include Spanish markets, churches, schools, WIC offices and farm fields.

In addition to promoting assistance programs, the community health outreach workers will also integrate rate resources by promoting PG&E's energy management tools to ensure customers are better managing their energy use and can afford to pay their energy bill. In Q4 of 2017, the Community Engagement team will review CARE penetration rates across the service territory in order to explore other counties for focused outreach efforts in 2018 and beyond.

4.6.1.3 Energenius Out-of-School Time

PG&E worked with the California School-Age Consortium (CalSAC) to update PG&E's Energenius® curriculum to a more activity-based afterschool or out-of-school time (OST) curriculum and make it more culturally appropriate for low income and disadvantaged communities. The OST field staff serves afterschool programs, school-age child care, school-based programs, summer learning programs, parks and recreation, YMCA's, Boys and Girls Clubs, private programs, licensed family home care, and CBOs.

To support the growth of these afterschool programs in hard-to-reach communities, PG&E and CalSAC collaborated to market the new Energenius® OST program to raise awareness about environmental stewardship, and to increase access to PG&E services for low income families. To ensure the new curriculum was adopted for use in the

programs, CalSAC actively promoted the Energenius® OST materials to its longstanding, statewide Trainer Network as well as partnered with the Afterschool Regional Leads in the County Offices of Education.

In Q4 of 2016, PG&E began supporting family engagement activities through CalSAC. Family engagement activities include events such as community workshops and afterschool functions, bringing parents of children participating in afterschool activities to a trusted space. In this trusted space, where parents entrust their children, CalSAC was able to promote PG&E's assistance programs, primarily CARE. As a result of this partnership, 92 percent of the CARE applications that were submitted through this channel resulted in CARE new enrollments within this hard-to-reach community. Additionally, educating children about energy is a powerful channel to reach this audience as parents are often more willing to listen to their children. It was a good opportunity to build trust with this audience as well.

The partnership is continuing in 2017. The Community Engagement team remains committed to enhance and improve the program as needed.

4.6.2 ESA In-Home Energy Education

ESA's in-home energy education provides a unique opportunity for a personalized conversation with customers about their bill and energy use. Energy Specialists will guide customers through the online account login process, helping register those customers who have not yet set up an account, using the customer's computer or mobile device. The Energy Specialist will also help customers enroll in High Usage Alerts and Bill Forecast Alert, and conduct a rates comparison to help the customer choose the rate plan that's best for them. These steps also align with the requirements of Assembly Bill (AB) 793 – EMT, connecting the customer with specific EMTs.

The energy education session also includes a review of tips and tools to better manage energy use. Among other topics, customers will learn about behavioral changes that can help during particularly hot or cold months and basic steps that they can take each day to most effectively manage their use and, ultimately, the amount they are charged.

PG&E plans to leverage materials being developed for Residential Rate Reform for cost efficiencies and that the messaging is consistent for the customer whether they're talking to someone at a local non-profit partner, the contact center or an ESA Energy Specialist.

4.6.3 Local Office Outreach and Community Events

In 2017 and beyond, the Community Engagement team will build upon successes from 2016 activities. PG&E's Community Engagement team will continue supporting local offices via outreach events to create awareness and provide education about the CARE Program via CBOs or CSRs. CSRs will help customers better understand their bill, as well as drive participation in CARE and ESA and other energy management programs including Medical Baseline, Balanced Payment Plan, Large Print Bills, In-Language Bills, SmartRate and SmartAC.

Moving forward, PG&E plans to focus on local office outreach in areas with low CARE and ESA penetration rates, collaborating with ESA Program staff and implementers on specific ESA-focused promotions twice per month. PG&E is exploring how to best leverage CBO's from local office communities to build customer trust and credibility with PG&E. The goal in bringing in CBOs to support local office outreach events would be to provide additional respected voices to educate on the programs and tools PG&E has to support our low income customers.

The Community Engagement team supports community events via CARE Community Outreach Contractors and other requests made through PG&E's local offices and other channels, placing focus on free events that are open to the public. Of specific interest are events that target hard-to-reach communities and urban areas with high poverty, with attendance of at least 200 people to ensure low income education is maximized.

Recent examples of community events include staffed booths at Bay Area Lunar New Year celebrations and at Hispanic, Asian and Filipino grocery stores. While more expensive than other tactics, community events provide an opportunity to engage customers in their language of choice and provide information about a suite of programs and tools, including rate plan options and seasonal tips to help conserve energy. Customer feedback from each event has been positive, with many customers thanking booth staff for answering their questions in their preferred language, and for helping them fill out the applications for both CARE and ESA. PG&E will continue to explore cost effective opportunities to promote low income programs at events and other locations in addition to the outreach conducted by CBOs.

4.6.4 Contact Center Support

The Contact Center is one of PG&E's primary channels for providing one-to-one direct customer support. In order to leverage the opportunity to educate customers about assistance programs and rate plan options, PG&E continues to enhance training and resources. CSRs receive regular training updates about residential rate changes and assistance programs for low income customers so that they can answer questions and offer support for managing bills and energy use. The contact center supports hard-to-reach customers in their language of choice either by on-staff CSRs who speak Spanish or by leveraging the third-party language line to allow for customers to communicate in 200 languages. PG&E uses a tool called General Reference (GenRef) for up-to-date information about marketing campaigns so CSRs can answer questions if there are customer calls about communications.

4.6.5 PG&E's Website

PG&E's website provides low income customers with easy ways to view and pay their bill, set up recurring payments, review their rate plan options, sign-up for paperless bills, report outages and start, stop, or transfer service. Many low income customers—including approximately 600,000 CARE-enrolled customers (46 percent)—have online accounts.¹³² During ESA's enhanced energy education, Energy Specialists will help customers set up and explore their online account on their own computer or mobile device during the home assessment appointment.

The PG&E website serves as an important channel for CARE acquisition and ESA lead generation campaigns. Marketing messages are intentionally kept brief so as not to overwhelm customers and often encourage customers to enroll via the website. In fact, applying online is the primary call-to-action for many marketing touchpoints including email, digital advertising and media campaigns.

PG&E seeks to provide education on the CARE and ESA programs including easy access to customer eligibility, program requirements and information, and applications. Customers can apply for CARE and ESA without logging in to their account. CARE customers can enroll while logged into their account and the ESA online application is also being revised to include a logged-in version. PG&E intends to optimize the Thank

¹³² PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Targetbase, November 2016. The overall frequency for Residential customers with an online account is approximately 53 percent.

You page served after the CARE or ESA application is submitted to promote other programs tips and tools tailored to low income customers.

Customers can also easily find links to printable versions of the CARE application, PEV request form, high usage form and other resources on the CARE landing page. The ESA landing page includes program information and eligibility, as well as a contractor look-up tool to help customers verify the local contractors serving their zip code. Most forms and fact sheets are available online in English, large print English, Spanish, Tagalog, Chinese, Vietnamese, Korean, Hmong and Russian.

Additionally, the CARE and ESA landing pages include educational material in the form of seasonal energy management tips, Frequently Asked Questions (FAQ), and contact information for program-specific questions and application assistance.

Between 64 percent and 74 percent of low income customers own a smartphone, and many depend on their mobile device to access online content.¹³³ In 2016, PG&E comprehensively redesigned its website and is striving to meet the Web Content Accessibility Guidelines (WCAG) AA Standards.¹³⁴ As part of the accessibility improvements, PG&E updated its website to include a refined web design with larger fonts, a higher color contrast, easy click buttons for key actions, and updated videos with closed captioning and written transcripts. This website redesign makes it easier for PG&E customers with disabilities to find assistance programs and other tools to better manage their energy use.

Per the mandate that CARE customers be able to facilitate secure CARE recertification and PEV (including income documentation capture and submittal), PG&E plans to develop web functionality that is mobile-enabled to complete PEV tasks via mobile device in November 2017.¹³⁵ CARE recertification function has been mobile-enabled since 2014.

4.6.6 Amplify Low Income Messages Through Public Relations

The public relations plan is integrated with PG&E's overall marketing plan to ensure consistency of message, timing and call-to-actions and provides a platform for CARE

¹³³ PEW Research Center. Mobile Fact Sheet. January 12, 2017.
<http://www.pewinternet.org/fact-sheet/mobile>.

¹³⁴ What is in WCAG 2.0, Web Accessibility Initiative <https://www.w3.org/WAI/intro/wcag>, October 19, 2016.

¹³⁵ D.16-11-022. OP 77.

and ESA communication opportunities. These channels can be highly effective at amplifying overall messages and also provide additional credibility as content is created by a third-party voices. In addition, public relations can be targeted regionally for specific initiatives that need to be more localized, like support of PG&E's seasonal campaigns or counties with low CARE enrollment.

A number of media vehicles will be employed to extend the reach and frequency of messages to the low income audiences. It is important to develop and distribute messages across a wide variety of channels in order to inform, educate, and generate awareness to the hard-to-reach audience. PG&E may utilize the following communication channels for external audiences:

- Mainstream media
- Local media
- Local influencers
- Social media channels as appropriate

4.6.7 Increase Reach Through Media Relations (Public Relations)

Media education and outreach is an integral component to increase the overall reach of PG&E marketing. Media relations tactics are a cost effective way to drive additional reach and awareness of financial assistance programs and can be targeted to regions with low enrollment.

Media relations tactics may include:

- Initiating an aggressive media outreach campaign to inform the media about financial assistance programs available to customers, particularly around months with higher usage in the summer and winter. Again, targeting counties with low enrollments and/or greater numbers of low income customers. Partner with key in-language media partners to inform customers in their language, via vehicles that they trust.
- Developing op-eds and/or letters to the editors on the benefits of rate plan change, tools, and options, including the financial assistance programs with a focus on higher usage months in the summer and winter.
- Training subject matter experts as spokespeople who can inform and engage customers, working in conjunction with local media.

4.6.8 Drive Awareness through Social Media Presence

PG&E has a robust social media presence. Our current channels include Twitter (75,800 followers), Facebook (154,300 followers), LinkedIn (87,200 followers), Instagram (8,000 followers) and YouTube (3,600 followers). Social channels can be influential with low income customers, particularly Twitter and Facebook, according to historical data. In PG&E's experience, local and targeted messages garner the most support and engagement, and sponsored posts enable PG&E to reach more of our customers. The content will need to be carefully curated to successfully engage our customers via these social channels. A well-thought out content strategy will be critical to promote the financial assistance programs. Following are examples of how PG&E might engage low income customers via social channels:

- 1) Utilize Twitter feed to build awareness, and interact with media, local influencers and prospective customers.
- 2) Leverage YouTube channel to house all related video content, customer testimonials, and how to videos.
- 3) Develop social media content for use by employees and partners and seek out opportunities for them to engage in discussions on blogs and/or message boards.
- 4) Test implementing customer-facing podcasts.

4.6.9 Develop Low Income Ambassadors Through Employee Education

PG&E has over 22,000 employees throughout our service area. These employees are well-positioned to act as the bridge between the company and its customers, and are often the best advocates. PG&E will establish a regular cadence of communications and training to ensure that employees and retirees understand the financial assistance programs and have the tools they need to discuss them with customers, family and friends.

Employee communications will be timed with summer and winter seasons and any major rate initiatives so that employees are well versed in how to help customers, family and friends prior to seasonal usage impacts or rate plan changes. Employee education outreach may include the following:

- Web-based training modules, presentation and meeting materials.
- FAQs for employees.
- Ongoing development of materials for customer interaction.

- Regular employee communications on the implementation of new rate plans, and how best to help customers make informed choices about their energy use, along with the importance of financial assistance programs.
- Intranet site to house all previously-distributed information as well as links to tools and programs that can help PG&E employees assist customers with making the right rate plan choice and manage their energy costs.
- Leveraging internal channels like the Daily Digest email to all employees or our intranet channel (PG&E@Work) to educate employees.
- Employee-facing podcasts to educate employees on various programs which generally include awareness of financial assistance programs in these communications.
- PG&E's unique 'Here to Help' hotline. Employees who are asked questions from their family and friends, but don't know where to turn to find the correct information, can call the Here to Help hotline. Hotline advisors will be well informed regarding the tools, rates and programs available to PG&E employees and customers.

CARE and ESA Marketing and Outreach Plan

Chapter 5

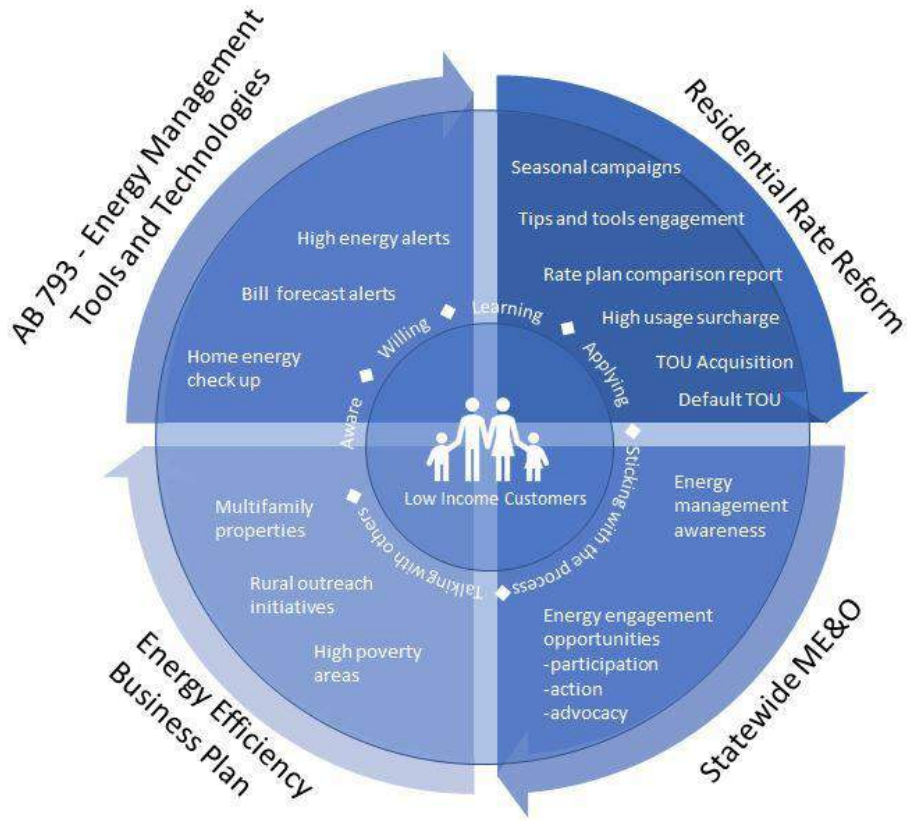
Integration

5. Integration

5.1 Regulatory Coordination and Integration

PG&E is actively coordinating low income M&O with the M&O of other residential proceedings. The goal of this coordination is to find opportunities to leverage best practices, share marketing channels, and where relevant, integrate communications to drive marketing efficiencies. PG&E continues to integrate energy management communications as opportunities arise to present solutions in way that will resonate with customers and ensure a positive customer experience. PG&E leverages an Integration Assessment Framework (Table 5-2) to evaluate and implement integration opportunities.

FIGURE 5-1
REGULATORY COORDINATION IS ESSENTIAL TO DELIVERING THE LOW INCOME CUSTOMER EXPERIENCE



The following regulatory proceedings present some of the key integration opportunities for M&O to our low income customers to 2020:¹³⁶

**TABLE 5-2
REGULATORY PROCEEDINGS**

Residential Proceedings	Application or Advice Letter #	Date PG&E Filed Application or Advice Letter	Decision or Resolution Approval	Approval Date
Residential Rate Reform	–	–	D15-07-001	07/03/15
Marketing Education and Outreach (ME&O) Plan Advice Letter	AL 4949-E	11/01/16	Pending Approval	–
Voluntary (Opt-in) TOU Advice Letter	AL 4764-E	12/24/15	Resolution E 4762	02/25/16
Default TOU Pilot Advice letter	AL 4979-E	12/16/16	Draft Resolution E-4846 issued 6/28/17	–
Section 745 – default exclusions and hardship cases	–	04/19/17	D.16-09-016	9/15/16*
High Usage Surcharge Advice Letter	AL 4722-E-A	Supplemental 3/25/16	Disposition	08/24/16
Statewide ME&O – Post 2016**	–	04/05/17	D.16-09-020**	09/19/16
EE Rolling Portfolios	–	–	D.15-10-028 and D.16-08-019	10/22/15 and 8/18/16
EE Business Plan	A.17-01-015	01/17/17	Pending Approval	–
EE Implementation Plan		To be filed 10/1/2017	To be posted, no approval Required	–
AB 793 – EMT	AL 3842-G/5074-E	Supplemental 5/22/17	Disposition	5/1/2017
San Joaquin Disadvantaged Communities – Report of Low Income Marketing	–	To be filed 7/21/17	–	–

This chapter examines five residential proceedings—Residential Rate Reform; Statewide ME&O; Energy Management Tools and Technologies (AB 793); Energy Efficiency Business Plans and San Joaquin Disadvantaged Communities—to highlight

¹³⁶ Integration opportunities will be evaluated on an ongoing basis and new integration opportunities will be included as appropriate.

where there are evident, and in some cases, realized opportunities for supporting low income needs. It also provides examples of execution tactics that are being deployed.

For M&O integration strategies and tactics driven by PG&E’s CARE and ESA programs, please refer to Section 4.5 of this filing.

5.2 Integration Assessment Framework

Considerable focus has been placed in recent years on how to best integrate residential marketing and communications to benefit PG&E and their customers. PG&E often uses the following evaluation framework to assess residential campaign integration opportunities, and will deploy similar decision-making criteria to assess future opportunities.

**TABLE 5-3
INTEGRATION EVALUATION FRAMEWORK**

Alignment of Objectives:	Ensure the goals of the programs are aligned and mutually supportive of positive customer outcomes.
Audience Alignment:	Target audiences are sufficiently aligned (or may be segmented) to effectively integrate messages.
Channel & Cadence:	Channels support the ability to present multiple messages effectively to customers. In some cases, it may be more effective to present messages in multiple communications versus one communication to customers, due to complexity of integrated messages.
Test/Learn/Optimize:	There is an opportunity to learn from the integration initiatives and generate data that support subsequent steps/direction, and the ability to focus the integration.

Integrating communications can be challenging due to the fact that each regulatory case is tasked with different objectives and is in a different phase of the regulatory cycle. In addition, customer-facing marketing plans and communications may also be at very different stages. This makes identifying opportunities to coordinate marketing strategies and channels, as well as integrate messages, a complex and difficult task. It can be difficult and costly to continue to make modifications to marketing plans and collateral already in execution and can result in fragmented and less effective communications. That said it is PG&E’s position that this is a priority that requires ongoing planning and coordination.

5.3 Residential Rate Reform

5.3.1 Residential Rate Reform ME&O Regulatory Background

In PG&E's Residential Rate Reform ME&O Advice Letter filing of November 1, 2016 PG&E developed a marketing plan based on the following three objectives:

- 1) Address the needs of a unique and diverse customer base through careful segmentation.
- 2) Prioritize a positive customer experience.
- 3) Allow for flexibility and optimization based on:
 - a) Results of the Opt-In and Default TOU pilots and other in-market tests;
 - b) Final Decision on the default rate; and
 - c) Results of ongoing customer research.

The Residential Rate Reform marketing goal is to generate awareness and understanding among customers regarding their rate plan options, how to choose the right rate plan, and what they can do to better manage their energy use and ultimately, their bill.

To address PG&E's overarching goal leading up to Default TOU in 2019, as well as help customers shift their electric usage away from peak periods and conserve energy overall, PG&E's focus is on moving customers from an unengaged state to becoming aware of the new ways they can control their energy bill. This is consistent with how PG&E is evolving engagement with low income customers as part of its current marketing plan. PG&E's overarching marketing strategy for PG&E's Residential Rate Reform efforts is evolving in three phases from 2017-2019.¹³⁷

Phase 1 (2017) – Test and Learn Engagement

The focus is to determine the most effective ways to engage customers in energy management and prepare them for Default TOU by deploying test and learn approaches. Key initiatives include:

- Tips and Tools Engagement campaigns
- Seasonal campaigns
- TOU Acquisition campaigns

¹³⁷ PG&E Residential Rates Marketing Education and Outreach Plan, November 1, 2016, p. 45. As of the date of this filing, Advice Letter 4949-E has not been approved.

Phase 2 (2018) – Optimize Engagement

PG&E will optimize outreach based on lessons learned from 2017 and scale to drive deeper engagement with rate plan options, tools, tips and programs to help customers further manage their energy use, and prepare for default to TOU rate plans in 2019.

Phase 3 (2019) – Continue Engagement and Prepare for Default

PG&E will continue to drive customer engagement with energy management, and begin targeted communications to prepare them for default to TOU.

5.3.2 Tips and Tools Engagement Campaign

An important initiative in the Residential Rate Reform plan is the digital Tips and Tools Engagement Campaign. PG&E is implementing this campaign leading up to and through the transition to Default TOU over the next few years. The goal of the campaign is to drive ongoing awareness and engagement with low income customers in holistic energy management solutions. PG&E will coordinate existing CARE and ESA digital acquisition campaigns with the “always-on” digital Tips and Tools Engagement campaign to deliver communications in a relevant and cost effective manner.

As discussed in the CARE Marketing Plan Section 4.2.6.2 and ESA Marketing Plan Section 4.3.2.1, digital ads driving enrollment in either program will likely be targeted to areas with lower penetration of these programs. Once a customer takes action to enroll in these programs, PG&E will likely then serve up relevant retargeting campaigns to customers for additional energy management tips, tools and rate plan options. Additionally, in areas where PG&E has higher penetration with CARE and ESA, PG&E will serve up tips, tools and rate plan options to help customers take the next step in their journey, to more efficiently manage their energy use and save money.

Content and messaging will be regularly rotated across channels to drive momentum and to avoid message fatigue. Some of the specific items that PG&E plans to promote to customers to keep energy top of mind include:

- 1) Sign-up for CARE and ESA
- 2) Create an online account on pge.com
- 3) Complete a rate analysis and change rates as appropriate
- 4) Take the Home Energy Checkup
- 5) Sign-up for Bill Forecast or High Usage Alerts
- 6) Adopt new, positive energy behaviors

Low income customers more often rely on handheld devices for accessing the Internet, so digital campaigns will continue to be mobile-optimized and drive to the newly optimized pge.com. Digital campaigns may also be targeted to specific hard-to-reach multicultural audiences in preferred languages such as Spanish, Chinese, Hmong, Vietnamese, Russian and Korean.

5.3.3 Seasonal Campaigns

Since 2014, PG&E has deployed seasonal campaigns promoting energy savings solutions, tips and bill management options to low income and general market customers who are likely to see high bills during the hottest and coldest times of the year. These campaigns serve as semi-annual reminders for customers that bills tend to go up during these seasons. The intent is to help customers understand their energy usage and adopt positive energy management behaviors in an effort to mitigate large swings in seasonal bills at a time when they are most likely to be receptive to taking action. These campaigns will be especially important as customers begin to default to TOU and may see increased summer bills.

PG&E targets those who are impacted seasonally by summer heat and winter cold weather, with special attention paid to those considered “high impact” from a bill perspective. High impact customers are those who are expected to experience bill increases of \$10 dollars and 10 percent or more for CARE customers, or \$20 dollars and 10 percent or more for non-CARE customers.

PG&E plans to continue executing targeted seasonal campaigns, likely with a combination of targeted paid media tactics such as radio and digital advertising. Those who are deemed to be high impact will receive direct-to-customer tactics that may include direct mail, email and outbound telephone or automated calls. Paid media tactics will layer on to direct-to customer channels and reach a wider audience of those impacted by summer heat or winter cold to provide additional customer awareness.

Community engagement and earned media efforts further amplify marketing efforts in counties that are most impacted by seasonal weather and bill impacts to drive greater awareness, and in the case of community engagement efforts provide a helpful, personalized layer of outreach to customers. Community-based outreach will provide an integrated outreach plan including the following:

- Continue targeting hard-to-reach, culturally diverse populations, impacted by seasonal bills and rate plan changes.

- Leverage community workshops and events, local offices, door-to-door outreach campaigns and outreach at Cooling Centers, where possible.

For low income customers, messaging will continue to focus on low and no cost tips, tools and programs to help them manage their bills. PG&E has spent considerable time mapping out how to integrate the communications to ensure a positive customer experience. In PG&E's 2017 summer outreach, digital advertisements are focused on serving up individual solutions including Bill Forecast Alert, Home Energy Checkup, and Budget Billing, as well as general savings tips to be included in each creative execution. As customers click on the ad(s), they are driven to a landing page on pge.com featuring multiple savings solutions. However, in email and direct mail creative, low income customers see customized CARE and ESA acquisition messaging depending on their eligibility. The format of email and direct mail is more conducive to individualized targeting and also more effectively serves up multiple messages aimed at helping to alleviate the cost of seasonal energy use.

PG&E has a rigorous test-and-learn plan for the summer campaign to determine the most cost effective channel strategy for seasonal campaigns moving forward.

5.3.4 TOU Acquisition Campaign

In March 2016, PG&E introduced two new residential TOU rate plans which were made available immediately to all customers on an opt-in basis. One of these rates includes a baseline allowance that is appropriate for lower-use households, and the other rate is without a baseline that is more appropriate for higher-use households. These foreshadow an eventual transition for most customers to TOU rate plans, a process we refer to as Default TOU. As described in PG&E's Advice Letter 4764-E,¹³⁸

Modeling shows that there is a group of customers who may benefit financially by moving to TOU rate plans ("benefiters"), without changing their energy consumption behavior. Many of the benefiters are also CARE customers who could be helped financially by enrolling in a TOU rate plan.

PG&E determined that it would be worthwhile to begin to enroll low income benefiters in 2017 to allow low income customers who may be excluded due to special

¹³⁸ PG&E's Opt-In Time of Use Pilot Proposal in Compliance with CPUC D.15-07-001, December 24, 2015.

hardship or statutory exclusions per Public Utilities Code Section 745 an opportunity to enroll.

In June 2017, PG&E began testing a TOU Rate Acquisition campaign to approximately 180,000 customers, of which roughly 50 percent are CARE customers. For purposes of this campaign, where customers are encouraged to take action to garner a benefit (bill savings), PG&E set a “benefiter” threshold of greater than \$60 dollars, annually, for CARE customers (versus greater than \$120 dollars for non-CARE customers). Prior customer research suggests that \$10 per month—or \$120 per year—savings is the threshold at which many report intention to act. For CARE customers, we established a lower dollar savings, on a presumption of greater price sensitivity. The TOU acquisition campaign promises to provide valuable additional information regarding the annual bill savings that truly motivate customer action. All low income customers will receive direct mail, as well as mobile-optimized email. Both email and direct mail communications display the customer’s anticipated savings in prominent locations—the subject line, headlines, “Johnson Box,” etc.—thereby drawing immediate attention to the financial benefit from switching to a TOU rate plan. This reduces the customer need to log in to pge.com to conduct a personalized rate comparison, though that option is always available.

PG&E will closely examine those who engage with the campaign, conducting phone and online surveys with a test group and a control group to determine customers’ understanding of rate plan options and ways to save money. For future campaigns, PG&E may explore tactical message variations, such as Spanish-language direct mail targeted to specific audiences, such as low income segments and the hard-to-reach.

5.3.5 Default TOU Initiative

PG&E is preparing to transition all eligible residential customers on a tiered rate plan to a Default TOU rate plan in 2019. Two pilots are taking place prior to 2019 to help inform the broader TOU default; the TOU Opt-in Pilot and the Default TOU Pilot. The ME&O plan for Default TOU will be modified with learning and results from PG&E, SCE and SDG&E’s pilots as well as the results from PG&E’s other ME&O efforts in 2017 and 2018.

PG&E is currently evaluating how to operationalize the full default rollout in 2019, where approximately 3 million customers will need to be transitioned. The Default TOU Pilot, currently scheduled to begin March 2018, will transition 250,000 customers over a

two-week timeframe. This pilot will provide key operational learnings regarding the Information Technology systems and Contact Center volume that will need to be incorporated as part of the full rollout.

PG&E will need to refine its Default TOU outreach plans based on the expected Section 745 Decision on hardship and learnings from the Default TOU and TOU Opt-In pilots. In addition to excluding customers that are exempt by statutory requirements,¹³⁹ as part of the Section 745 proceeding, PG&E has recommended that CARE/FERA-enrolled or eligible customers in hot climate zones be excluded from the Default TOU Pilot.¹⁴⁰ While no customer class demonstrated unreasonable hardship due to TOU rate plans during the TOU Opt-In Pilot, PG&E is recommending that the CPUC should exercise its discretion and, pursuant to Section 745(c)(1), exclude PG&E's CARE/FERA customers in PG&E's hot climate zones from the Default Pilot for policy reasons.

In particular, PG&E has concerns about the energy burden effects on CARE/FERA customers in hot climate zones, where most counties suffer from double digit unemployment, from the high summer TOU bill impacts shown in the TOU Opt-In Pilot. These economically vulnerable customers cannot afford to absorb four months of high summer bill impacts under TOU. At the same time, CARE/FERA customers in hot zones demonstrate less understanding about TOU and significantly lower observed load shifting – the very behavior that could help mitigate these significant structural summer bill increases. To avoid the potential for broad negative customer reaction to TOU, PG&E believes it is prudent to use the Default TOU Pilot to learn from other customers, including CARE/FERA customers in PG&E's moderate and mild climate zones, about how best to communicate with them for a smoother transition to TOU.

If CARE/FERA customers in hot climate zones are excluded from the Default TOU Pilot, PG&E will continue to reach out to these customers as a normal part of program and energy management communications, but will not transition them to a time-of-use

¹³⁹ Statutory exclusions from Default TOU include all of the following: (1) Medical Baseline customers; (2) third-party notification customers; and (3) customers who require an in-person visit from a utility employee before disconnection.

¹⁴⁰ More specifically, PG&E proposes to exclude all customers enrolled in CARE or FERA and to also use its propensity model to exclude all customers designated in its top two deciles of likely eligible customers. PG&E would like to see further data, including preliminary results of the Default Pilot, before making a final determination on whether its CARE/FERA hot zone customers should also be excluded from full Default TOU.

rate plan during the Default TOU Pilot. Low income customers in mild weather regions will still be defaulted to TOU if PG&E's 745 exclusion requests are approved "as is."

Proposed Full Default TOU Marketing Strategy

PG&E's approach for full Default TOU marketing, outlined in its ME&O Advice Letter 4949-E, is focused on creating an optimal customer experience. PG&E's Default TOU marketing plan outlined several objectives to support this goal:

- 1) Drive awareness and understanding of rate plan options, Default TOU, and ways for customers to take action to opt-out, if they wish to do so.
- 2) Provide ongoing education about TOU rate plans and how to be successful on them, including ways to conserve and to shift usage away from the peak periods.

PG&E will be deploying a series of communications to customers in advance of the default to TOU. PG&E is considering increased outreach to customers who would be most impacted by the default those with higher potential bill impacts and low income customers that are eligible for the default. These customers will be provided with personalized, actionable information so they can become educated about the transition to TOU including the possible impact on their bills and available tools and solutions to help them manage their bills, and they will be encouraged to make an active decision to stay on the Default TOU rate plan or opt-out.

PG&E is also planning communications to customers after they are placed on their new TOU rate plan to educate them about how to be successful on their new rate plan. As applicable, these communications will be integrated with relevant solutions, including EE tips and tools and other helpful budget management solutions.

The application of these marketing strategies and tactics for low income customers is pending a final Decision on both PG&E's Default TOU Pilot application (Decision expected in August 2017)¹⁴¹ and the 745 application (Decision expected in September 2017). The outcome of these Decisions, together with the knowledge acquired from PG&E's two TOU pilots, will likely impact PG&E's final marketing approach for both low income and general market customers who are defaulting to TOU rate plans.

¹⁴¹ CPUC issued Draft Resolution E-4846 on June 28, 2017. It is currently scheduled to be voted on at the August 10, 2017 Commission meeting.

5.3.6 High Usage Surcharge Initiative

The High Usage Surcharge was introduced in March 2017 with the goal of encouraging energy conservation among customers whose electricity use is significantly higher than typical households (400 percent of the Baseline Allowance). PG&E filed a High Usage Surcharge Advice Letter¹⁴² in October 2015 with a supplemental filing in May 2016 that provided detailed marketing strategy for the High Usage Surcharge, including how to message to low income customers.

High Usage Surcharge Communications Plan

PG&E implements quarterly campaigns to customers “at risk”¹⁴³ of incurring the surcharge to promote awareness and understanding of the High Usage Surcharge, provide tools to avoid the surcharge, and encourage greater engagement in energy management and conservation.

PG&E developed CARE and non-CARE communications (both direct mail and mobile-friendly email) to ensure that customers are provided with the most relevant information. CARE customers represent approximately 14 percent of the total “at risk” population.¹⁴⁴ The primary message of the communication provides customers with education about the High Usage Surcharge. The secondary messages encourage customers to: sign-up for High Usage Alerts; learn more about rebates; and enroll in the ESA and Medical Baseline programs, if applicable. High Usage Alerts are delivered by email, text or phone to provide participating customers with an early warning notification that their usage is projected to trigger the High Usage Surcharge. This allows them to change their behavior prior to the end of the billing cycle in an effort to avoid the surcharge. Customers have the option to set and change their notification preferences by logging into their online PG&E account.

In addition to the direct mail and mobile-friendly email, the pge.com website¹⁴⁵ provides further details on tools and programs to help low income customers save

¹⁴² PG&E’s AL 4722-E PG&E’s Outreach and Education Plan for implementing the Super User Electric Surcharge, per D.15-07-001, October 16, 2015 and Supplemental Advice Letter 4722-E-A March 26, 2016. Approved by disposition on August 24, 2016.

¹⁴³ “At risk” customers have reached between 350 and 399 percent of baseline, at least three times during the 12-month period or reached 400 or more percent of baseline, at least once in a 12-month period.

¹⁴⁴ Data from the period of June 1, 2015 to December 31, 2016.

¹⁴⁵ High Usage Website URL – www.pge.com/highusage.

money. All these materials are offered in Spanish to ensure that Spanish-speaking customers in this group receive communications they can easily understand.

Moving forward, PG&E will further optimize these communications while continuing to focus on presenting straightforward, low cost tools, to help low income customers reduce their energy use below the surcharge level. PG&E is evaluating the results of High Usage communications and exploring ways to optimize outreach in the future.

5.4 Statewide ME&O Coordination and Integration

Per Commission Decision,¹⁴⁶ DDB San Francisco (DDB) has been charged with executing the Statewide ME&O Program (Statewide ME&O) for residential and small business consumers, reflecting the vision that:

...Californians will be engaged as partners in the state's energy efficiency, demand-side management and clean energy efforts by becoming fully informed of the importance of energy efficiency and their opportunities to act.¹⁴⁷

DDB has produced a Five-Year Roadmap that articulates the path for achieving the CPUC's goals of:

...increasing progress on energy efficiency and reducing greenhouse gas (GHG) emissions through behavior change and lead generation.¹⁴⁸

DDB has identified two customer engagement objectives that will "lay the foundation for behavior shifts":

- *Awareness* ("of the Energy Upgrade California brand, its mission, and energy-management actions that California residents and small businesses can take to contribute to the statewide goal"); and
- *Intent* ("changes in behaviors, lead generation, engagement with our content, and advocacy").¹⁴⁹

To meet the above objectives, Statewide ME&O's "awareness" efforts are necessarily broad in scope, covering all California residents and small businesses, and its messaging is general. Statewide ME&O's Energy Upgrade California (EUC) campaign supports 16 products/services, 8 of which are "high priority": "Behaviors

¹⁴⁶ D.16-03-029.

¹⁴⁷ D.16-03-029, Attachment A, p. 1.

¹⁴⁸ "Five-Year Marketing, Education and Outreach Strategic Roadmap," DDB San Francisco, April 5, 2017, p. 5.

¹⁴⁹ DDB Five-Year Strategic Roadmap, p. 21.

(free), EMTs, Lighting, Home Energy Checkup/ Advisor, Residential Rate Reform/TOU (residential rate reform and time-of-use), ESA (energy savings assistance), Efficient Appliances, and Home Upgrade Program/Whole House (efficiency improvements).”¹⁵⁰

Statewide ME&O’s “intent” efforts are focused on transforming awareness into action by encouraging Californians to work directly with local program administrators (such as PG&E) to better understand, and manage, their energy consumption.

PG&E has long supported Statewide ME&O, and we are actively coordinating with program implementer DDB San Francisco, the Commission’s Energy Division, our energy company peers, and other stakeholders for the success of the EUC campaign.

As part of our support of and coordination with EUC, PG&E seeks opportunities to coordinate with EUC whenever feasible. This is particularly the case with ESA outreach and messaging. We are approaching ESA coordination with EUC as described in the following chart from the Joint IOU Low Income Webinar held on April 21, 2017.¹⁵¹

**TABLE 5-4
SW ME&O ESA COORDINATION ROLES**

Goal	Role	Messaging	Tactics
Awareness of energy conservation	EUC	Do your thing. If we all just do one more thing to save energy, it adds up to a big change for California.	<ul style="list-style-type: none"> • Digital • Broadcast media, print and OOH • PR • Website
Intent to engage in energy management	EUC	Programs are available that can make EE more affordable or even free for your home. Contact your local energy provider to see if you qualify.	<ul style="list-style-type: none"> • Website • Toolkit • Social media • CBO education materials • Community-based print and online media
Drive participation in ESA Program	Energy companies	As a participant in the CARE Program, you may be qualified for energy efficient home improvements at no cost through the ESA Program.	<ul style="list-style-type: none"> • Energy companies will deploy a number of tactics. • Where there is overlap of above tactics, coordination is occurring to avoid duplication (ex. Website Community-Based Outreach)

¹⁵⁰ DDB “Five-year Marketing, Education and Outreach Strategic Roadmap,” p. 38.

¹⁵¹ “Joint IOU Low Income Webinar” presentation, April 21, 2017, slide 28.

As the EUC campaign's emphasis on lead generation takes shape, PG&E will be fully prepared to support the referred customers so that they may take full advantage of not only the ESA program, but of all relevant PG&E energy and usage information, alerts, efficiency measures, and rebates for which they are eligible.

Use of EUC Assets in PG&E's Low Income Marketing

During PG&E's low income workshop on May 25, 2017, intervening parties and Energy Division staff suggested that PG&E begin to leverage EUC-branded assets for PG&E's ESA campaigns. We have given this suggestion serious consideration, and have concluded that use of EUC's assets will be less effective in reaching PG&E's CARE and ESA customers than our current approaches. There are several reasons behind this conclusion:

At present, customer awareness of the EUC brand is limited, and an important aspect of the Statewide ME&O program is to increase the brand's visibility. DDB's current television and radio brand advertising is likely to strengthen Californians' awareness of the brand. But as we have learned from prior Statewide ME&O programs over many years, it will take significant marketing effort and time to generate the necessary awareness for the public to recognize the brand and what it stands for. Until that time, references to EUC in PG&E's local outreach risks confusing the customer about who is promoting the ads, and where to go for further information or to take action.

PG&E is additionally concerned that the suggested approach attempts to join together two campaigns – EUC and PG&E's local CARE & ESA outreach—which have different objectives and messages. As discussed above, DDB is taking a broad, general-population approach to its outreach. The approach is constructed around a “Do Your Thing/Do One More Thing” theme which is designed to encourage energy management action on the part of a general audience, not a low income audience. PG&E questions the extent to which this campaign will be relevant to low income customers, since EUC does not have an established relationship with PG&E's low income customers. These customers need personalized help from a trusted resource that can provide assistance with regard to energy management efforts. PG&E is in a unique position in that low income customers know and trust PG&E, and are highly satisfied with PG&E programs and services; in addition PG&E provides personalized

support via the Contact Center and website to help guide low income customers enroll in the right programs to help them manage their bill.

EUC's messaging for ESA was not developed specifically for low income customers. This is evidenced by the limited research DDB has performed to understand the low income population:

- 1) While the original EUC campaign concept was tested among customer groups reflecting the demographics of the state, "Do Your Thing" messaging was not tested among low income audiences.
- 2) DDB's segmentation study to determine optimal targets for the campaign did not leverage survey methods, such as telephone and U.S. Mail, which are necessary to reach low income, hard-to-reach, and multi-cultural customers.

In addition, PG&E believes that the creative approach and imagery may not resonate with low income customers. Although the "Do Your Thing Creative" shows ethnically diverse customers, the imagery is not sufficiently reflective of low income customers' situation, such as smaller, older homes; MF buildings, and outdated appliances.

As mentioned above, a priority for EUC's marketing is not only to raise awareness, but to generate leads for PG&E's low income programs. DDB's Joint Consumer Action Plan states that the campaign will include web and CBO support to drive lead generation for the ESA Program. While we welcome those efforts, it has not yet been determined that the EUC campaign will include promotions targeted specifically to the low income audience. Such targeting is essential, given the circumstances of the audience, their means of communicating, their budgets and priorities.

In conclusion, because the EUC campaign was not specifically tested and developed for low income customers, and the campaign's messaging is not yet targeted to a low income audience, PG&E cannot rely on EUC to generate sufficient awareness, intent, or leads for our low income programs' continued success. However, when further low income research data have been generated and are available from DDB, and adjustments to the messaging and outreach methods have been made, PG&E will gladly reconsider its position relative to leveraging EUC's branding and messaging.

PG&E will continue to actively coordinate with Statewide ME&O and support the realization of the EUC's campaign goals. Through these efforts, PG&E will become aware of when additional low income research has been conducted and more low

income campaign data are available. At that time, PG&E will evaluate the results with an eye to revisiting further integration of Statewide and PG&E messages.

5.5 Assembly Bill 793

5.5.1 Marketing Goals and Objectives

AB 793 is a bill that mandates the Investor Owned Utilities (IOU) to offer residential, low income and small and medium business customers Energy Management Technologies (EMT) to help customers better understand and manage their energy use. To meet this plan, the statewide IOUs have created a Joint IOU marketing plan, in addition to their own local marketing plans.¹⁵²

PG&E's local AB 793 marketing plan¹⁵³ addresses the overall challenge of low customer awareness and adoption of EMTs in residential, low income, and small and medium business customer segments. PG&E's marketing plan is designed to educate and encourage the adoption of EMT solutions with the highest impact on customers' energy usage, and to prepare residential customers for transition to TOU rate plans in 2019.

PG&E's local marketing plan will take an integrated approach to help customers progress in their energy management journey by increasing their awareness and ultimately their adoption and use of EMTs. PG&E acknowledges that each customer—whether residential, low income, or small or medium business—will be in their own unique step in the energy management journey. To best meet customers where they are along the journey, PG&E has tailored strategies that will guide them from one step to the next, helping customer learn and apply the tools and practices that bring better efficiency and energy management into their homes or businesses.

Specifically for low income customers, PG&E plans to offer solutions that fit their particular needs and circumstances to help them have greater control over their energy usage and bills. PG&E will offer preventative solutions to help these customers: avoid potential disconnection; setup a payment plan, and empower themselves to better manage their energy bills.

¹⁵² PG&E AL 3842-G/5074-E-A. PG&E's AB 793 Request for Approval of PG&E's AB 793 Implementation Plan. May 22, 2017. Approved effective June 21, 2017. PG&E AL 3843-G/5075-E Compliance with Resolution E-4820 to promote EMTs for residential and small and medium business customers. May 22, 2017. Approved June 30, 2017.

¹⁵³ PG&E's AB 793 Plan runs from September 2016 to December 2018.

The marketing efforts will: highlight the variety of solutions available; underscore the benefits of adoption; and help guide customer behavior change, in relation to changing rate plans.

5.5.2 Priority Tools and Technologies for Low Income

PG&E considered two important factors when determining tools and technologies for low income customers:

- 1) Low income customers' mindset is further influenced by sensitivity to cost.¹⁵⁴
- 2) Low income customers face adoption barriers, such as lack of Internet access or dated buildings and appliances that make managing energy use more challenging.¹⁵⁵ The lack of Internet access is mitigated by low income customers' wide adoption of smartphones that allow access to mobile-optimized websites.

To address these barriers, PG&E is prioritizing low and no-cost EMTs that provide mobile-optimized website support. PG&E's AB 793 marketing plan focuses on positioning these tools and technologies to help low income customers save money on their bill. A few examples of the low and no-cost EMTs are:

- Tier 2 Advanced Power Strips (offered through the ESA Program)
- Bill Forecast Alert
- Home Energy Checkup

To better understand low income barriers related to EMTs, PG&E is considering additional customer and market research. This would allow PG&E to develop more robust data on how to market and position EMTs, especially tools that may involve an investment from customers. For example, Share My Data is a free energy management application, included in the AB 793 Advice Letter, for customers who want to stream their own energy usage data directly from PG&E, but it currently is only available by way of a paid application.

¹⁵⁴ Travis Research for PG&E (2017) CBO Rate Reform Training Study.

¹⁵⁵ California Energy Commission (2016) Senate Bill 350 Overcoming Barriers to Energy Efficiency and Renewables for Low Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities. http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214830_20161215T184655_SB_350_LowIncome_Barriers_Study_Part_A_Commission_Final_Report.pdf.

5.6 Energy Efficiency Business Plan Coordination and Integration

5.6.1 Background

PG&E has submitted an Energy Efficiency Business Plan¹⁵⁶ which outlines the high level approach to achieving state EE policy goals through 2025. PG&E sees opportunities to align efforts, specifically with regard to MF properties.¹⁵⁷ As EE implementation plans are developed, PG&E will look for additional ways to align and leverage efforts for low income customers. Additionally, PG&E will encourage third parties to propose ways to align efforts in any new programs that are proposed through the solicitation process. As directed in the Decision, PG&E will continue to coordinate ESA Program efforts with activities in the EE proceeding,¹⁵⁸ presenting plans for full adoption in the next ESA Program cycle application.

5.6.2 Low Income Customer Considerations

The roadmap includes a discussion about serving low income customers, as well as reaching hard-to-reach groups and disadvantaged communities, which may at times align with our low income customer base. PG&E will explore opportunities to align outreach efforts to rural communities and high poverty areas, presenting CARE and ESA as tools to help low income customers save money and manage their energy consumption.

Low income customers have a tailored EE program in the ESA Program. Traditionally, ESA has focused most efforts on treating the individual tenant units, but sees a great deal of benefit in coordinating efforts around treating MF properties, and is building a program with more focus on treating the building's common areas by integrating with EE efforts. The ESA Program is working closely with the EE team to develop a SPOC to help MF building owners find the right programs to reduce the energy footprint of their buildings, which will include ESA treatment for qualified tenants. The Multifamily Sector Section 2.3.5.3 and Section 4.3.2.4 provides more information about M&O support for these efforts.

¹⁵⁶ PG&E Energy Efficiency Business Plans, Application 17-01-015, January 17, 2017.

¹⁵⁷ PG&E Energy Efficiency Business Plans, Application 17-01-015, January 17, 2017. Residential Chapter 2, pp 71-140.

¹⁵⁸ Energy Efficiency Proceeding R.13-11-005.

5.7 San Joaquin Disadvantaged Communities

The San Joaquin Disadvantaged Communities Phase I Decision was issued on May 11, 2017, and resolves the potential energy options that should be evaluated for economic feasibility and implementation in the next phase of the proceeding. During the first phase, a methodology was developed and agreed upon to determine the criteria disadvantaged communities and the specific San Joaquin communities that are meet the criteria Phase II commenced with a prehearing conference on June 8, 2017.

In Phase II, the Commission's goal is to evaluate extending natural gas service, craft targeted solutions for communities with less than 5 percent natural gas service, and develop general or specific electric programs or subsidy solutions pursuant to Section 783.5. Phase II may consider new program services or offerings to be delivered in coordination with CARE or ESA to offer additional assistance to the communities identified pursuant to § 783.5. Phase II will also evaluate the economic feasibility of modifying the All Electric Baseline Program by: (1) increasing baseline quota for enrolled CARE households; and (2) allowing enrollment by CARE households with propane or wood burning as energy sources.¹⁵⁹

As Phase II proceeds, PG&E will continue to look for ways to help customers in the communities identified as disadvantaged in the San Joaquin Valley.

¹⁵⁹ San Joaquin Disadvantaged Communities, D.17-05-014, May 11, 2017.

CARE and ESA Marketing and Outreach Plan

Chapter 6

Measurement and Metrics

6. Measurement and Metrics

A key component to PG&E's data-driven M&O strategy is a strong measurement plan. Marketing strategies are developed to reach clear goals and objectives, and measurement keeps the tactical plans on the path to reaching those objectives. Plans are in place to measure: program awareness and understanding; campaign deployments; and participation rates among hard-to-reach groups. PG&E will also track efforts of CBOs to educate and enroll the hard-to-reach populations that they serve.

Marketing effectiveness is measured through both customer surveys and campaign response metrics. Key Performance Indicators (KPIs) are established, and then closely monitored for each tactic and channel, as part of PG&E's test and learn approach. Continual measurement and evaluation informs PG&E's adjustments to testing strategies, creative production, tactical plans and budget allocations. KPIs range from digital impressions and click-through rates to email open rates and direct mail application submissions. PG&E's marketing team is dedicated to continuous improvement and regularly shares marketing best practices for improving effectiveness and generating efficiencies.

Integrated marketing efforts, such as program offerings featuring information about rate reform, are also precisely measured to understand the impacts of bundled messaging. PG&E strives for an optimal customer experience so customer feedback and metrics monitoring are important aspects of staying on course for bringing low income customers on a path to greater energy management.

6.1 Measurement Goals and Approach

The following section outlines PG&E's plan to measure the effectiveness of M&O strategies to influence awareness, understanding, and participation in CARE and ESA via customer surveys and data tracking (operational tracking of numbers of enrollments, applications, etc.). PG&E will continue to measure and evaluate the impact efforts of PG&E marketing, ESA subcontractor outreach, and the efforts of CBOs.

**TABLE 6-1
METRICS AND MEASUREMENT METHODOLOGIES**

	Metric	Methodology
1.	Awareness and understanding of CARE and ESA programs and key program benefits Awareness of other low income portfolio programs Experience of CARE and ESA programs Awareness, understanding and engagement with energy management opportunities	Customer survey
2.	Marketing response	Tracking of operational data (applications, enrollments, etc.)
3.	Training and outreach efforts of CBOs	Tracking CBO engagement

6.1.1 CARE and ESA Program Survey Metrics

Measuring CARE and ESA Program awareness, understanding and experience: Measuring CARE and ESA program awareness and understanding among income eligible customers will help PG&E develop M&O strategies to more precisely reach remaining customers. PG&E plans to track overall CARE awareness among the income eligible non-enrolled audience, and ESA Program awareness among the target CARE-enrolled audience. CARE and ESA program awareness baselines are already established among these audiences, as outlined in Section 3.1. Also, collecting insights from CARE and ESA participants regarding program experience will inform areas of opportunity for improving messaging or operational strategies.

Monitoring the customer path to better bill and energy management: It is vital that low income customers are aware of and engaged in programs, tools and tips to help manage their bills. Therefore, in addition to tracking CARE and ESA awareness, understanding and engagement, PG&E intends to closely monitor low income customers' progress along the path to better energy management. PG&E will gather this data similarly to the way in which energy management progress is tracked across all residential customers in the Residential Rate Reform ME&O Tracking Study. PG&E will monitor awareness, understanding, and engagement with low income portfolio programs, such as: Budget Billing and Medical Baseline, and with energy management opportunities, including: rate plan options, tips, and tools applicable to low income

customers. Questions will include awareness of rebates, EE programs and tools to help manage their bill—the perceived usefulness of such programs, and actions taken around programs, rate options and tools.

PG&E intends to gather the data outlined above via customer surveys every two years, bundling efforts whenever possible for cost effectiveness. We also plan to survey customers in English and Spanish among CARE and ESA targets, and include the hard-to-reach customers of focus per the Decision (e.g., customers who live in rural and/or high poverty areas, renters).

6.1.2 CARE and ESA Enrollment and Lead Generation

As discussed above, KPIs are identified and tracked for marketing tactics, and each marketing campaign is measured holistically against baseline and industry benchmark metrics. PG&E's test and learn approach relies heavily on continual measurement toward established goals.

CARE marketing tracking will include:

- Enrollments toward achieving the aspirational penetration rate target of 90 percent of eligible customers enrolled in CARE;
- CARE applications received by channel;
- Overall cost-per-acquisition; and
- Overall CARE penetration data, including estimated participation among hard-to-reach customer groups, including customers who live in rural and high poverty areas.

For key retention marketing campaigns, such as the welcome kit, PG&E plans to establish a set of baseline performance metrics that will be used to measure success for future efforts as the CARE welcome experience evolves over time. Other KPIs for retention align to the program measures in place for recertification, auto-enrollment and attrition.

ESA marketing tracking will include:

- Leads generated by campaign and channel;
- Overall cost-per-lead generated;
- Overall associated rates of home assessment and treatment; and
- Participation rates among hard-to-reach groups including renters, customers in rural and high poverty areas, and customers in priority CARE segments.

**TABLE 6-2
KEY PERFORMANCE INDICATORS FOR COMMON TACTICS**

Tactic	Metric
General Awareness	
Television	Impressions
Radio	Impressions
Print	Readership
Online	Impressions, click-through rates
Social Media	Shares, view-through rates
Bill Package	Distribution, applications /enrollments
Website	Views, applications submitted
Direct Marketing	
Direct Mail	Distribution, response
Email	Distribution, click-through rates, response
Outbound Calls	Lead conversion, enrollments

6.1.3 CBO Client Engagement Tracking Approach

PG&E works closely with CBOs and their leaders to provide deeper, one-to-one customer education on rate change, tools and options. However, PG&E recognizes the limitations of CBOs’ capacity, funding, staffing and capabilities. These organizations are designed to be resources within a community to address specific societal problems. This focus can limit the organization’s ability to provide broad outreach on non-mission-driven issues like rate change and program awareness. With this understanding, PG&E works with these groups as partners to deepen engagement, follow-up on existing marketing collateral, and help clarify messages.

In turn, PG&E’s measurement and evaluation of effectiveness of these groups reflect those expectations. PG&E partners with CBOs to serve as a channel for educating customers regarding low income programs and rate change topics. PG&E will continue tracking engagement and program enrollment via CBOs, and plans to utilize CBO-specific vanity URLs to track customer engagement with featured residential rate plan information.

In addition, as stated in the ME&O filing, CBOs selected to conduct outreach on PG&E’s behalf, will be required to submit a narrative report that captures customer

complaints and resolutions as it relates to this outreach activity. In doing so, PG&E will have direct feedback from CBOs which can be considered for continued planning.

While a highly useful measurement tool in other M&O channels, PG&E does not plan to employ customer surveys as a method to measure effectiveness of the CBO channel. Conducting these types of surveys would require collection of personal customer information that could degrade the significant effort made to build trust between the CBOs, PG&E, and customers in the community.

The Rate Reform ME&O Metrics and Measurement plan currently tracks the efforts of CBOs. PG&E will leverage this data toward ensuring that we are optimizing this important outreach channel, and specifically will follow progress regarding the following CBO metrics:¹⁶⁰

**TABLE 6-3
CURRENT CBO TRACKING**

Channel	Tracking Number of Community Partners	Tracking Number of People Reached
CARE Community Outreach Contractors	<ul style="list-style-type: none"> • Number of contracts • Number of Community Engagement Partners 	<ul style="list-style-type: none"> • Track number of CBO staff trained on residential rate awareness • Track number of events • Track number of people touched at each even • Number of new CARE Enrollments • Number of Medical Baseline enrollments • Number of ESA enrollments

¹⁶⁰ See Appendix 8 for expanded list of Rate Reform CBO tracking metrics.

CARE and ESA Marketing and Outreach Plan

Chapter 7

Budget

7. Budget

This section includes a budget estimate for the ME&O activities based on the plan developed.

7.1 Introductory Caveats

The Decision approved PG&E's application to administer and market the CARE and ESA programs locally. Throughout 2017-2020, PG&E will continue evaluating and optimizing different marketing tactics and optimizing tactics to deliver the most effective and cost efficient plan.

PG&E's proposed budgets for CARE and ESA M&O efforts do not exceed the annual authorized amounts for 2012-2014 or 110 percent of the maximum annual actual expenditures, whichever is greater.¹⁶¹ As such, PG&E will submit this M&O plan to the proceeding service list. If at a later date it is determined that a larger budget is necessary, PG&E will file an updated marketing plan, and associated budgets via a petition to modify.¹⁶²

In the following sections, PG&E has provided estimates of the costs across each of the cost categories. It is not possible at this early stage to predict with precision the level of PG&E's ultimate, actual costs for each category that will be required to meet the goals set forth in this Decision. PG&E has attempted to forecast in these preliminary budget estimates the major areas for which it will be spending their authorized dollars. PG&E reserves the right to reallocate dollars when appropriate to align with the most cost effective means of meeting the goals of this Decision.

7.2 ESA Estimates

The Decision authorized \$1,975,000 annually for M&O activities related to the ESA Program from 2017 to 2020.

PG&E is providing preliminary cost estimates for currently anticipated 2017 to 2020 M&O activities to enroll eligible customers in the ESA Program. In the section below,

¹⁶¹ D.16-11-022, p. 164 and COL 63.

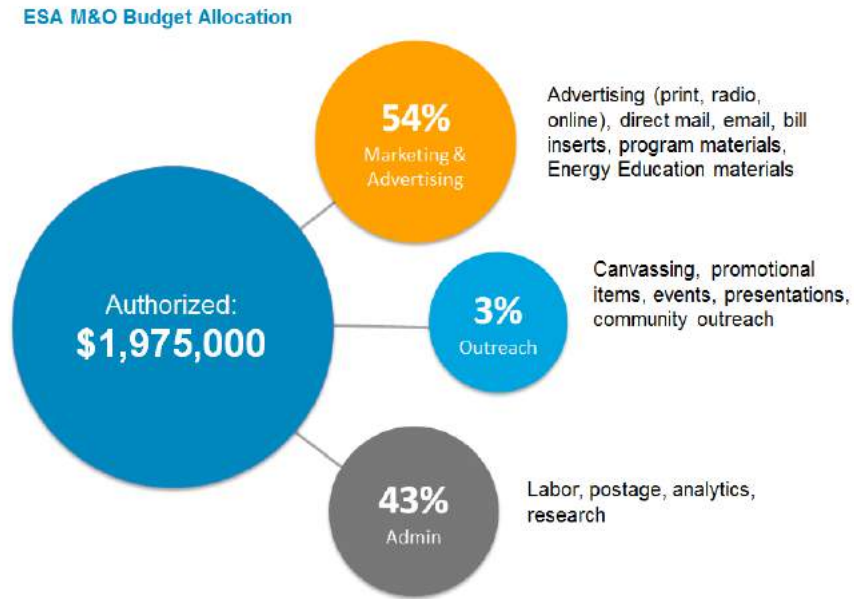
¹⁶² D.16-11-022, p. 164.

PG&E has included estimates of PG&E's labor, third-party contracts, and other costs relating to M&O activities that are to be recovered through the ESA Program balancing accounts. These estimates include:

**TABLE 7-1
ESA 2017- 2020 MARKETING EXPENSES TABLE**

ESA Marketing & Outreach	2017	2018	2019	2020	Total
Communications Development	\$50,000	\$80,000	\$100,000	\$100,000	\$330,000
Direct Mail - Acquisition	897,500	694,000	694,000	694,000	2,979,500
Direct Mail - Welcome Kits	20,000	75,000	75,000	75,000	245,000
Email	10,500	11,025	11,576	12,155	45,256
Media	143,500	250,000	250,000	250,000	893,500
Bill Inserts	24,000	24,000	24,000	24,000	96,000
Technology License Fees	10,000	10,500	11,025	11,600	43,125
Data Management	205,000	205,000	205,000	205,000	820,000
Forms/Collateral/ Brochures	60,000	60,000	60,000	60,000	240,000
Strategic Consulting	117,500	25,000	25,000	25,000	192,500
Other	37,000	63,475	94,399	80,245	275,119
Research	–	65,000	–	–	65,000
Labor	400,000	412,000	425,000	438,000	1,675,000
Total	\$1,975,000	\$1,975,000	\$1,975,000	\$1,975,000	\$7,900,000
Authorized	\$1,975,000	\$1,975,000	\$1,975,000	\$1,975,000	\$7,900,000

PG&E’s expected allocation of the total authorized budget for 2017 include:



As stated above, PG&E reserves the right to make adjustments to these allocations as deemed necessary to most cost effectively achieve the goals of the Decision.

7.3 CARE Estimates

The Decision authorized the CARE Program budget from 2017 to 2020. Below is the authorized budget for CARE M&O activities:

**TABLE 7-2
CARE 2017- 2020 AUTHORIZED BUDGET**

2017 Authorized Budget	2018 Authorized Budget	2019 Authorized Budget	2020 Authorized Budget
\$9,768,742	\$9,858,816	\$9,901,337	\$10,228,265

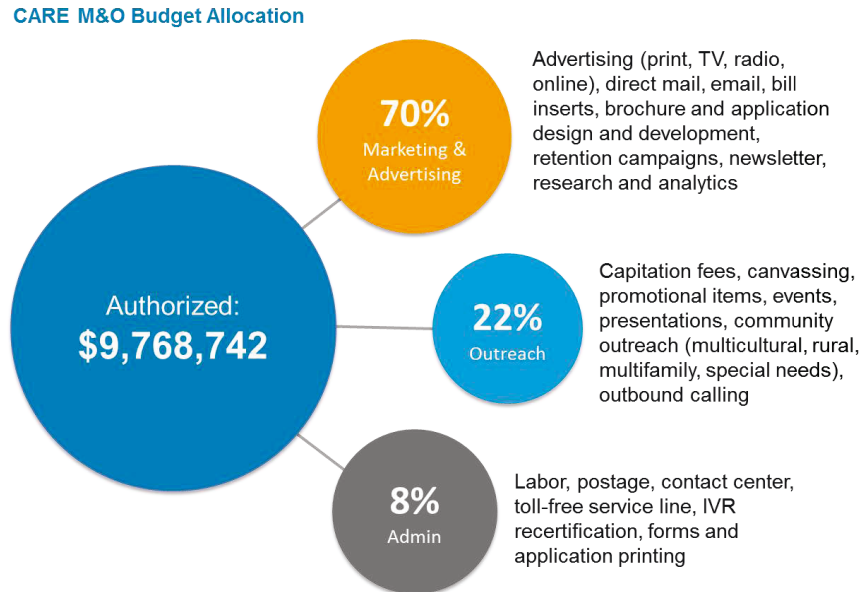
PG&E is providing preliminary cost estimates for currently anticipated 2017 to 2020 M&O activities to enroll and retain eligible customers in the CARE Program. In the section below, PG&E has included estimates of PG&E’s labor, third-party contract, and other costs relating to M&O activities that are to be recovered through the CARE Program balancing accounts. The estimates include:

**TABLE 7-3
CARE 2017 TO 2020 MARKETING EXPENSES TABLE**

CARE Marketing & Outreach	2017	2018	2019	2020	Total
Communications Development	\$222,000	\$494,200	\$244,200	\$544,200	\$1,504,600
Direct Mail	1,338,100	1,088,100	1,142,505	1,142,505	4,461,210
Email	145,000	145,000	152,250	152,250	594,500
Media	3,035,000	2,924,250	3,275,160	3,275,160	12,259,570
Bill Inserts	300,000	300,000	300,000	300,000	1,200,000
All Connect Mover Program	414,800	435,540	452,962	452,962	1,756,263
Technology License Fees	50,000	55,000	60,500	66,550	232,050
Data Management and Analysis	387,000	400,545	414,564	414,564	1,616,673
Forms/Collateral/ Brochures	70,000	73,500	73,500	73,500	290,500
Other	187,600	187,600	187,600	187,600	750,400
Research	120,000	250,000	120,000	250,000	740,000
Labor	560,000	576,800	594,104	611,927	2,342,831
<i>Subtotal</i>	\$6,829,500	\$6,930,535	\$7,017,345	\$7,471,218	\$27,748,597
Community Engagement					
After School/Youth Education Outreach (CalSAC)	\$119,000	\$119,000	\$119,000	\$119,000	\$476,000
CARE COCs	86,000	86,000	86,000	86,000	344,000
Community Health Outreach	199,996	199,996	199,996	199,996	799,984
Community Ambassadors	125,004	125,004	125,004	125,004	500,016
Community Events	79,992	79,992	79,992	79,992	319,968
M&O Materials	735,003	735,003	735,003	735,003	2,940,012
Administrative Expenses	89,000	89,000	89,000	89,000	356,000
Labor	700,000	721,000	742,630	764,909	2,928,539
<i>Subtotal</i>	\$2,133,995	\$2,154,995	\$2,176,625	\$2,198,904	\$8,664,519
Other Outreach/Admin Costs	\$805,247	\$773,286	\$707,367	\$558,143	\$3,344,044
CARE & Comm. Engagement Total	\$9,768,742	\$9,858,816	\$9,901,337	\$10,228,265	\$39,757,160
Authorized	\$9,768,742	\$9,858,816	\$9,901,337	\$10,228,265	\$39,757,160

As stated above, PG&E reserves the right to make adjustments to these budget allocations as deemed necessary to most cost effectively achieve the goals of the Decision.

PG&E’s expected allocation of the total authorized budget for 2017 include:



PG&E’s CARE marketing & outreach budget estimates exclude costs associated with the promotion of Cooling Centers. Costs associated with the promotion and operations of the Cooling Centers are incurred at a different cost category than that of marketing & outreach. However, PG&E intends to continue to promote the Cooling Centers with an annual bill insert promotion in 2017, 2018, and 2019 before costs associated with Cooling Centers shift to becoming General Rate Case funded.¹⁶³

7.4 Integrated Outreach Funding

PG&E understands the importance of integrating customer outreach efforts to help customers gain greater control over their energy use, understanding of their bill, and education on available rate plans, available programs, such as CARE & ESA, tips, tools, and solutions. For more than five years, PG&E has focused on integrating marketing efforts across many of our programs and services. Where applicable, low income program marketing will integrate to cross-promote rates, programs, and products, as appropriate. When doing so, PG&E plans to leverage the budgets authorized in other

¹⁶³ D16-11-022, p. 9.

proceedings to co-fund integrated outreach efforts and cross-promotion opportunities based on the approach outlined below.

As PG&E reviews integration opportunities for Rate Reform and other DSM marketing efforts, it takes several steps to determine the appropriate integration opportunities and the associated funding allocations.

- Step 1 – PG&E considers which DSM programs can be effectively integrated based on the factors listed above.
- Step 2 – PG&E creates co-funded purchase orders and distributes costs based on the primary and secondary messaging of the communications. Primary program messaging would be defined as the most likely action a customer will take from receipt of the communication. In many cases, this will be engagement with the first marketing message (program) delivered. In direct mail and email examples, this would be content that is at the top of the page or above the fold. Secondary messaging would be defined as messaging delivered in the bottom half of creative or below the fold.

In these instances, the primary message (program) being delivered would allocate funding for a majority of the costs associated with the purchase order while the secondary message (program) will fund a lesser portion. PG&E will continue to evaluate integration opportunities and co-funding methodology and may revise the funding allocation percentages as necessary based on the number of balancing accounts co-funding the activities.

As an example, during the 2017 summer season, PG&E has a residential rate reform campaign promoting energy savings solutions, tips, and programs to customers that are likely to see a high bill impact during the hottest time of the year. Direct outreach efforts include a mix of email, telephone, and direct mail to customers likely to have the highest bill impacts and overlaid targeted paid media-radio, digital and in-language print ads in highly impacted areas to reinforce the direct communication messages and reach audiences that would still feel the effects of summer heat on their bills. In these communications, customers were reminded that the hot summer weather could mean higher energy use and bills, and were directed to pge.com/summer to find more targeted solutions for energy and money savings with programs like CARE and ESA, and products like Bill Forecast Alert, budget billing, and Home Energy Checkup. Being that the email communications are promoting the CARE and ESA programs to

CARE- eligible and current CARE customers, respectively, these programs are funding portions of the communications based on the share of voice that they make-up of the communication. The table below outlines various low income marketing tactics that are funded wholly by amounts authorized in the Decision and other marketing opportunities that exist where low income marketing funds cover partial costs depending on the share of voice within these tactics. The tables below outlines various low income marketing tactics that are funded wholly by amounts authorized in the Low Income Decision and other marketing opportunities that exist where low income marketing funds cover partial costs depending on the share of voice within these tactics.

**TABLE 7-4
CARE, ESA, AND INTEGRATED TACTIC FUNDING**

CARE Funded Tactics	ESA Funded Tactics
Direct Marketing - Direct Mail & Email	Direct Marketing - Direct Mail & Email
Digital Media	Digital Media
Bill Inserts	Radio
Television	Bill Inserts
Radio	Lead Generation
New Mover Program	Social Media
Rate Comparison Report (CARE customers only)	
Social Media	

Integrated Funded Tactics	
Residential Digital Newsletter	Hyper-Local Campaign
Tips and Tools Engagement Campaign	Seasonal Campaigns (Summer & Winter)
Triggered Campaigns	

As it relates specifically to the integration of information related to Residential Rate Reform, PG&E may utilize CARE authorized funding to cover the costs associated with communications to customers regarding rate plan changes and enrollment status related to AB 327.¹⁶⁴ PG&E will report on the integrated costs associated with

¹⁶⁴ D.16-11-022, OP 70.

communications to customers about their enrollment status and about rate changes related to AB 327 in the annual reports. **165**

165 D.16-11-022, OP 71.

PACIFIC GAS AND ELECTRIC COMPANY
APPENDIX 1
CARE AND FERA ENROLLMENT APPLICATION



CARE/FERA PROGRAM APPLICATION Residential Customers

The way
Californians
are charged
for energy
is changing.
Learn more!

Save on your monthly PG&E bill

California Alternate Rates for Energy (CARE)

pge.com/care
1-866-743-2273

The CARE Program offers a monthly discount on PG&E bills for qualifying households. You can enroll by:

- Checking all the qualifying public assistance programs from which you, or someone in your household, receive benefits **OR**
- Checking the box that matches your household's total gross annual income.*

Other qualifications include:

- Your monthly electric usage does not exceed six times the Tier 1 allowance.
- You are not claimed as a dependent on another person's income tax return other than your spouse.
- You do not share an energy meter with another home.
- You will renew your eligibility at least every two years.

CARE Income Guidelines (good until May 31, 2017)

Number of People in Household	Total Gross Annual Household Income*
1-2	\$32,040 or less
3	\$40,320 or less
4	\$48,600 or less
5	\$56,880 or less
6	\$65,160 or less
7	\$73,440 or less
8	\$81,780 or less
Each Additional Person, add	\$8,320

Family Electric Rate Assistance (FERA)

pge.com/fera
1-800-743-5000

If you do not qualify for the CARE

Program, you may still qualify for the FERA Program, which offers a monthly discount on electric bills for households of three or more people with a slightly higher income than required for CARE.

See the FERA Income Guidelines listed above to find out if you qualify, and enroll by completing the included application.

FERA Income Guidelines (good until May 31, 2017)

Number of People in Household	Total Gross Annual Household Income*
1-2	Not Eligible
3	\$40,321-\$50,400
4	\$48,601-\$60,750
5	\$56,881-\$71,100
6	\$65,161-\$81,450
7	\$73,461-\$91,825
8	\$81,781-\$102,225
Each Additional Person, add	\$8,320-\$10,400

*Total gross annual household income includes all taxable and nontaxable revenues from all people living in the home, from whatever sources derived, including, but not limited to, wages, salaries, interest, dividends, spousal and child support payments, public assistance payments, Social Security and pensions, housing and military subsidies, rental income, income from self-employment and all employment-related, non-cash income.

†Learn more about rate changes at pge.com/ratechanges

How You Can Apply

Online: Apply online for faster enrollment at pge.com/care

Phone: Apply by calling
1-866-743-2273

Email:
Take a picture or scan completed application and email this image to
CAREandFERA@pge.com

Mail:
Send completed application to
CARE/FERA Program
P.O. Box 7979
San Francisco, CA 94120-7979

Fax:
Send completed application to
1-877-302-7563

Other Helpful Programs and Services

Energy Savings Assistance Program

pge.com/energysavings
1-800-989-9744

**Energy Savings
Assistance Program**

This program provides energy-efficient home improvements and appliances at no cost to customers who qualify for CARE and rent or own a home that is at least five years old.

My Account

pge.com/myaccount

Log in to My Account to sign up for billing and payment alerts, analyze your household's energy usage, pay your bills and learn more about your rate plan options.

Balanced Payment Plan

pge.com/balancedpayment
1-800-743-5000

Your monthly bill will be averaged out to allow you to budget your energy costs and eliminate big payment swings.

Medical Baseline

pge.com/medicalbaseline

If you depend on life-support or other equipment due to medical needs, you may be eligible for additional energy at the lowest price through the Medical Baseline Program.

App1-1

Low Income Home Energy Assistance Program (LIHEAP)

1-866-675-6623

If you spend a high percentage of your income on energy bills, you may be eligible to receive financial assistance and weatherproofing services through this program administered by the California Department of Community Services and Development.

Universal Lifeline Telephone Service (ULTS)

Get discounted telephone access when you meet similar income guidelines as the CARE Program. To learn more, contact your local phone service provider.

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APPENDIX 2

ADDITIONAL CUSTOMER INSIGHTS

APPENDIX 2

ADDITIONAL CUSTOMER INSIGHTS

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1. Customer Demographics

In addition to the data provided in the Low Income Market Situation and Customer Insights section of this report, PG&E has tracked other customer data that allows us greater insight into the low income customer base and helps to inform marketing and outreach strategies.

1.1 Overall Low Income Customer Population

Of approximately 5.1 million customers in PG&E territory, about 31 percent (approximately 1.5 million) are estimated as CARE-eligible (or low income) customers. The percentage of CARE-enrolled customers among PG&E's residential base has remained steady at 26 percent since 2014.¹

1.2 Low Income Customers by PG&E Division

The highest concentrations of PG&E's low income customers live in the following PG&E Divisions: Fresno (12 percent), Sacramento (11 percent), Yosemite (10 percent), Kern (8 percent), Stockton (7 percent) the East Bay (6 percent), and San Francisco (6 percent).²

1.3 Climate Bands

An estimated 50 percent of PG&E's low income customers live in non-temperate climates, in extreme heat or cold.³ Climate band mapping reveals where customers live in non-temperate versus temperate climates, and might require more or less air conditioning or heating in order to live comfortably and to support their health needs. The majority of low income customers live in the following climate bands:⁴

- Climate Band S, Central Inland from Chico to Modesto (29 percent of low income customers live in this zone, includes 450,000 customers): this can be a hotter climate zone, requiring more air conditioning;

¹ PG&E Customer Analytics and Segmentation Database, 2017.

² PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

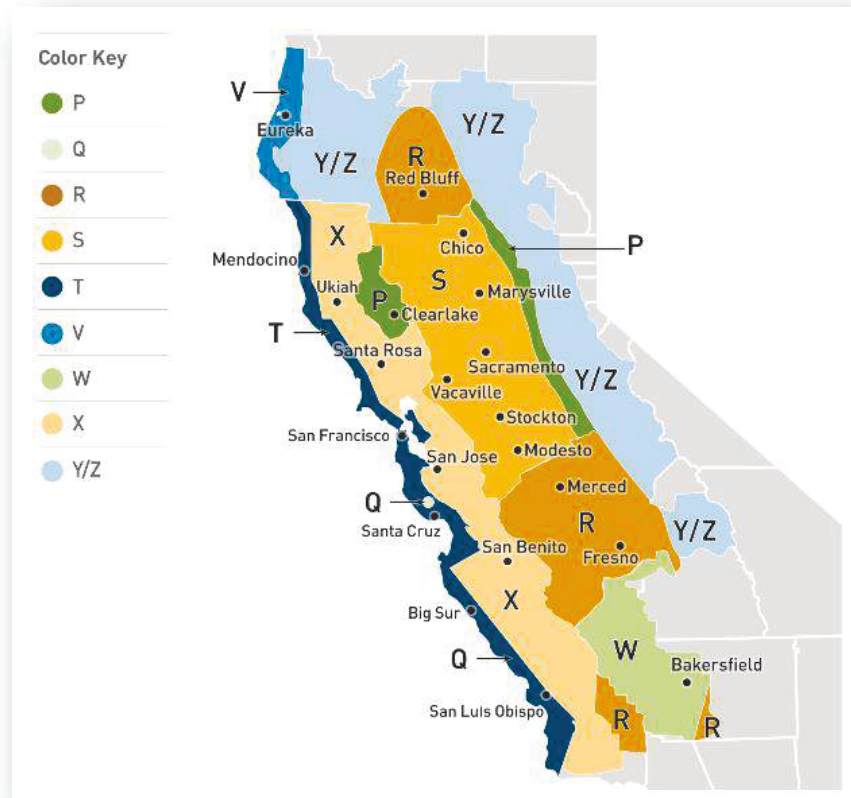
³ PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

⁴ PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

Appendix 2 - Additional Customer Insights

- Climate Band X, North Bay, much of East and South Bay (22 percent, 336,000): can be hotter climate requiring more air conditioning;
- Climate Band R, peripheral inland, e.g., Red Bluff and Fresno (18 percent, 282,000): can be hotter climate, requiring more air conditioning; and
- Climate Band T, most of the California Coastal region (17 percent, 259,000): this is a cooler climate zone, generally requiring more heating.

Map: PG&E Climate Band Map⁵



1.4 Home Ownership

Among the low income customer population, PG&E estimates that there is a greater share of homeowners (53 percent) than renters (42 percent). At the same time, PG&E's low income customers are more likely to rent their homes than customers not

⁵ https://www.pge.com/en_US/residential/save-energy-money/help-paying-your-bill/longer-term-assistance/medical-condition-related/medical-baseline-allowance/understanding-baseline-quantities.page.

Appendix 2 - Additional Customer Insights

considered low income—an estimated 42 percent of low income customers rent their homes, compared to just 23 percent of the remaining residential customer base. Overall estimated CARE penetration is high among both low income homeowners (88 percent) and renters (91 percent).⁶

CHART: RESIDENCE OWNERSHIP AND CARE PENETRATION⁷

	Total All Low Income Count	CARE Enrolled Count	CARE Penetration
Home Owner	820,295	721,589	88%
Renter	642,701	587,574	91%
* Unknown population:	82,720	30,827	N/A

Among ESA treated customers in 2016, the reported share of renters was 54 percent, and the share of owners was 46 percent.⁸

1.5 Age

Age is not a self-reported variable; instead PG&E uses Acxiom data overlays to estimate customers' ages. Among the estimated low income population 19 percent (approximately 300,000 customers) are over the age of 65, therefore, the larger proportion of low income customers are younger (under age 65).

⁶ PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

⁷ PG&E Customer Analytics and Segmentation Database, 2017.

⁸ PG&E's ESA EPO Database, 2017.

Appendix 2 - Additional Customer Insights

TABLE: PG&E LOW INCOME CUSTOMER AGE DISTRIBUTION⁹

AGE GROUPS	Estimated Counts: Age Range Among Low Income Customers	Estimated Rates: Age Range Among Low Income Customers
Age 18 - 24	50,410	3%
Age 25 - 34	127,481	8%
Age 35 - 44	171,815	11%
Age 45 - 54	218,565	14%
Age 55 - 64	205,127	13%
Age 65 +	299,949	19%
Age Unknown ¹⁰	472,369	31%

CARE-enrolled customers' age ranges are proportionate to that of the general population, with the exception of 18-24 year old CARE customers who are in the CARE Program at a slightly higher rate (4 percent) than the same age range within the general population (2 percent). CARE penetration is fairly high across age ranges, with all age ranges falling within 88 percent to 93 percent penetration.

TABLE: CARE PENETRATION BY CUSTOMER AGE RANGE¹¹

AGE GROUPS	Estimated Low Income Customer Count	CARE Enrolled Customer Count	Penetration Within Each Age Range
Age 18 - 24	50,410	46,972	93%
Age 25 - 34	127,481	117,321	92%
Age 35 - 44	171,815	156,769	91%
Age 45 - 54	218,565	197,336	90%
Age 55 - 64	205,127	182,220	89%
Age 65 +	299,949	263,092	88%

⁹ PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

¹⁰ Because age estimates are based on modeled data, there are a significant number of "unknown" ages in the PG&E database.

¹¹ PG&E Residential Profiles for CARE Enrolled and Non-Enrolled Customers, Customer Analytics and Segmentation Database, 2016, Q3.

PG&E's ESA Program data shows that in 2016, 34 percent of treated homes include a Senior resident.¹²

2. Low Income Customer Media Preferences

PG&E leveraged Pointlogic's Commspoint Journey media consumption tool to inform marketing planning for low income customers. This media consumption data is able to show how customers consume media in different points in their customer journey. For example, the media that is most effective for making someone go from 'unaware' to 'aware' of a product, might be different to when they enter the phase of actively researching a product. This is rarely a complete change from one media mix to a different media mix. However, analysis shows that for the energy sector, there are differences in how consumers seek out and expect to be delivered messages, based on where they are in the awareness/understanding/acquisition/retention process. This tool's specific phases are:

- **Awareness** – Data in this stage shows which channels and media formats are most effective at building customer awareness. This stage aligns with PG&E's CARE and ESA Acquisition journey stage called "Aware but not engaged."
- **Consideration** – The stage in the customer journey where customers are actively engaging with and looking for information about a product or solution. The media preference data considered includes triggers, how people use media to plan for a purchase or enroll in a program, the impact of current brand relationships, engagement barriers, channels used and media influencers. This phase corresponds to PG&E's CARE and ESA Acquisition journey stages of "Willing to engage" and "Learning more."
- **Buying** – This phase encompasses media preference data about the buying or acquisition experience. It is mainly focused on the retail purchase customer journey. However it also includes data on the customer experience of enrollment, signup, engaging with channels and other service-based elements which are relevant to PG&E's customers. This phase corresponds

¹² ESA, EPO Database, 2016.

Appendix 2 - Additional Customer Insights

to the “Applying” and “Sticking with the process” stages in PG&E’s CARE & ESA acquisition customer journey.

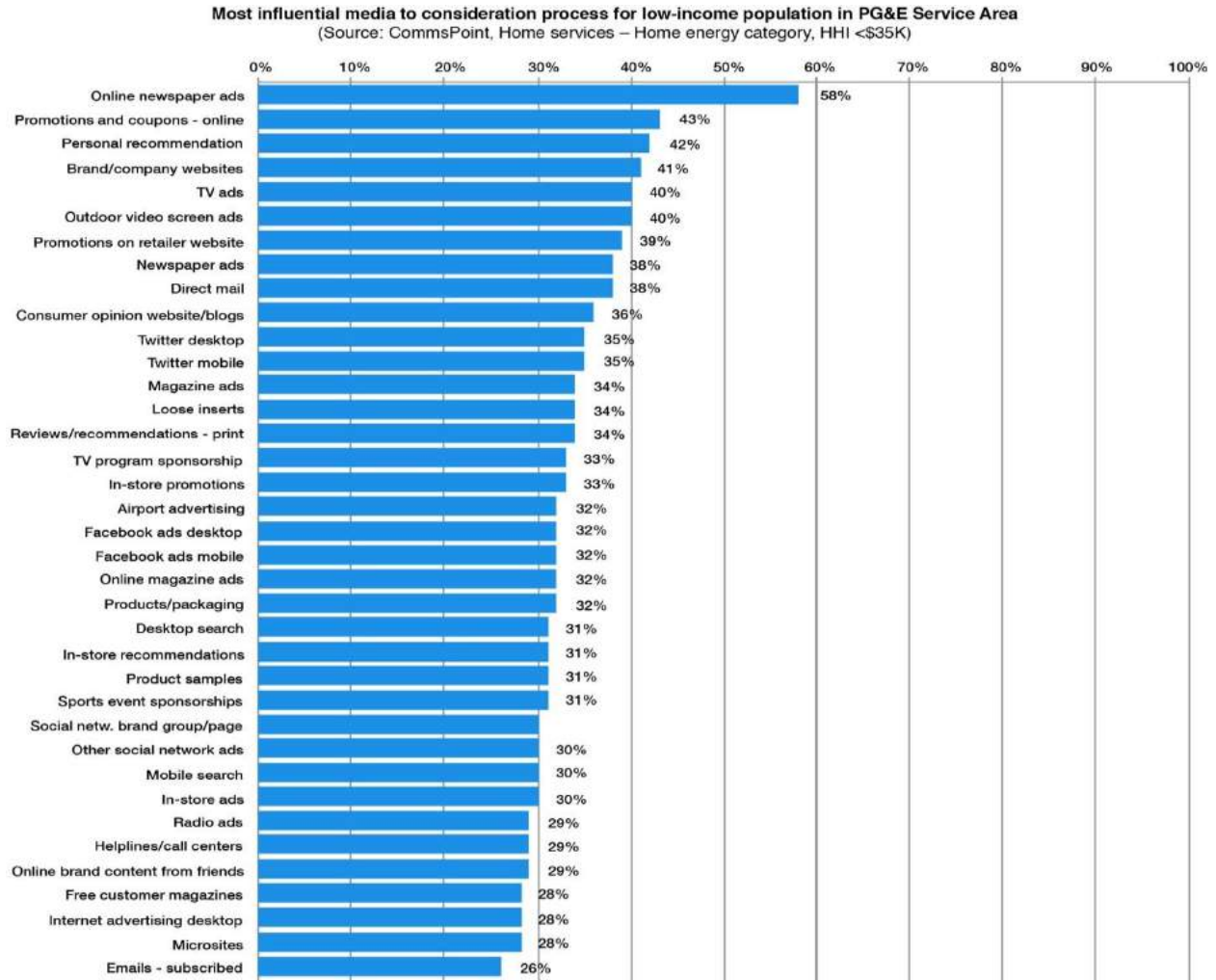
- **Experiencing** – This stage provides media preference data on how people proceed beyond the buy, to actually “using” the product or service, realizing promised benefits (or not) and choosing to advocate for the product/service and potentially purchase again in the future. This phase corresponds to PG&E’s CARE and ESA Acquisition “Talking to others” stage.

Given that PG&E has high levels of awareness and enrollment already, PG&E determined that it would pursue additional data in the Consideration media consumption phase, where customers would be more likely to take their next step to participate in programs. In PG&E’s CARE and ESA customer journey, featured in appendix 5a, this phase encompasses the “Understanding” and “Acquisition” stages.

The chart below shows the top-performing media to influence the consideration process in the energy sector among low income individuals in PG&E’s service territory.¹³

¹³ This is based on data from Pointlogic’s Commspoint Journey tool, which uses data from multiple sources to identify how people consume media. The data sources include Simmons, MRI, MARS, Vividata, Claritas and PRIZM. Additionally, Pointlogic fields their own survey to 30,000 consumers nationally to get basic, refreshed demographic information. In addition a survey is fielded to industry professionals to collect actual ROI metrics and feedback data on media channels to add performance as a layer to the data. This data is refreshed every six months. Current CommsPoint clients include Toyota, Unilever, Google, L’Oreal and most major media buying firms.

Appendix 2 - Additional Customer Insights



Data shows that several tactics are consistently rated high (considered influential in the consideration phase by at least 30 percent of customers) by all segments of PG&E’s low income population for influencing the consideration process, including: online newspaper ads, promotions and coupons (both online aggregators and on retailer websites), personal recommendations (or word of mouth), and TV ads. Tactics that have been used traditionally by CARE and ESA to generate awareness, consideration and conversion, such as the company website, direct mail and inserts, also fall within the top 30 percent for media preferences.

Two segments did show some variation, which will factor into our media selection, testing and measurement: the Hispanic population is more influenced by digital and social media advertising, while Seniors are more heavily influenced by their social networks and traditional advertising.

Appendix 2 - Additional Customer Insights

Seniors are less likely to have access to the Internet than Non-Seniors (64 percent compared to 82 percent). Non-digital forms of media are shown to be more effective and preferred by households with Seniors in terms of overall energy company interaction, including:

- Households with Senior residents who know of an IOU program are more likely to have learned of the program through an energy company mailing or via newspaper, radio, or news channel than households without an elderly resident;
- Households with a Senior resident are more likely to receive a paper bill (88 percent) than households without a Senior resident (77 percent); and
- Households with a disabled resident do not access the Internet as frequently as other households (66 percent access it at least a couple times per week as compared to 82 percent for other low income households).

3. PG&E Energy Bill Costs for Low Income Customers

According to PG&E's Rate Data Analytics database, the average monthly electric bill for PG&E's CARE customers system-wide in 2016 was \$66.34 (up about \$3.78 from 2015), while for non-CARE customers, the average was \$108.61 (up \$8.01 from 2015). In 2016, the average monthly gas bill for CARE customers was \$27.33 (up \$2.10 from 2015), compared to non-CARE customer's gas bills of \$39.33 (up \$3.40 since 2015).

4. CARE and ESA Program Participation Drivers

PG&E's CARE customers report their top reasons for participating in the program are:

- "Save money on the bill" (80 percent of customers).
- "Save energy" (16 percent), which could directly relate to saving money for low income customers.
- "Getting incentive" (8 percent). Note that since there is no "incentive" paid to customers for program participation, customers could be interchanging terminology, and referring to the bill discount as an incentive.
- "Convenient/easy" (7 percent).

For ESA customers, top reported reasons for participating are "save money on bill" (59 percent), followed by "save energy" (38 percent) and "improve comfort"

(18 percent). A smaller portion of customers join to “help the environment” (11 percent) or “improve appliance/equipment performance” (10 percent).

5. Program Satisfaction

The 2016 CARE Quantitative survey revealed that both Current Care (89 percent) and eligible non-CARE (71 percent) customers strongly agree that the program shows that PG&E cares about its customers, eases stress of prioritizing which bills to pay, and helps in having additional funds to spend on family or other bills. It is worth noting that a large portion of non-CARE customers (64 percent) would recommend the program to family and friends, even though they aren’t on the program.¹⁴ CARE customers are also more likely than non-CARE customers to strongly agree that PG&E helps customers make smart energy choices and save money (53 percent CARE vs. 32 percent non-CARE).¹⁵

6. Customer Segments

6.1 Customers Who Live in Multifamily Buildings

The most common ways that multifamily respondents report attempting to reduce their consumption is by: ¹⁶

- Turning off or unplugging appliances and electronics that aren’t in use.
- Turning off lights when not in use.
- Turning off heating or cooling systems.

6.2 Households With Disabled Customers

The Census definition of “disability” is broad, including a variety of characteristics that define four basic functional areas: hearing, vision, cognition and ambulation. While PG&E is not able to identify customers with disabilities among its customer database, we know that 3.6 percent of PG&E’s residential customers (including approximately 90,000 CARE-enrolled customers) are on Medical Baseline. PG&E has also conducted several research studies whereby households with disabilities have been identified;

¹⁴ PG&E CARE Quantitative and Qualitative Customer Research, Travis Research, 2016.

¹⁵ PG&E Residential Rate Reform Marketing, Education and Outreach Tracking Survey Report, Hiner & Partners, 2017.

¹⁶ ESA Program Multifamily Segment Study, Cadmus Research, 2013.

Appendix 2 - Additional Customer Insights

among these studies the Residential Rate Reform Marketing, Education and Outreach tracking study provided the following:¹⁷

- One in five (19 percent) of the residential population has someone with a disability living in the home.
- CARE customers are almost three times as likely as non-CARE to have someone with a disability in the household.
- Regarding the type of disability, CARE customers are more likely to have a chronic disease disability, while non-CARE customers are more likely to have hearing disabilities.
- Households with a disabled person are more likely to have a Senior as head of household/or living in the household, and more likely retired or unemployed.
- Hot climate zone customers also have a higher proportion of disabilities (27 percent vs 15 percent moderate and 18 percent cool) as do High Usage customers (29 percent).
- They are more likely to have reached out to PG&E in terms of signing up for a program or calling, but less likely to have visited the website.
- The Low Income Needs Assessment (LINA) 2016 study reports that if customers have a disabled household member who has medical requirements for additional heating or cooling, there may be a limited amount of energy savings possible. Certain medical conditions could limit ability to conserve, or completely bar disabled customers from partaking in certain ESA measures.¹⁸

¹⁷ Residential Rate Reform ME&O Tracking Survey, March 2016.

¹⁸ ESA/CARE Low Income Needs Assessment, Evergreen Economics, 2016.

PACIFIC GAS AND ELECTRIC COMPANY

APPENDIX 3

RACE/ETHNICITY DEFINITIONS

APPENDIX 3 ETHNICITY/RACE CATEGORY DEFINITIONS¹

PG&E’s Customer Analytics and Segmentation (CAS) database employs Geoscape data overlay in order to model customer ethnicity and race. The following categories are derived from Geoscape:

Caucasian	Anglo (Origins from Australia, Canada, Ireland, New Zealand, United Kingdom, and United States where English is the dominant language and social customs (particularly immigrants to U.S.) are mostly derived from British culture), Austria/Germany/Switzerland, Belgium/Netherlands, Cyprus/Greece, France, Malta, Italy, E. Europe Region (including former Soviet).
East & Southeast Asia	Origins from Asian countries located in East Asia (China , Japan , North Korea , South Korea , and Mongolia (as well as Hong Kong, Macau, and Taiwan) and Southeast Asia (Brunei, Cambodia , Indonesia, Laos, Malaysia , Myanmar (or Burma), the Philippines, Singapore , Thailand , East Timor (or Timor-Leste), and Vietnam).
African American	African American Ethnicity (Persons that have origins within the African American community. Excludes Blacks that have origins from outside the U.S.), sub-Saharan African, Caribbean.
South Asian	Origins in the South Asian sub-continent area (Bangladesh , Bhutan , India, Maldives , Nepal , Pakistan , and Sri Lanka).
Latino/Hispanic	Brazil/Portugal, Hispanic.

¹ Geoscape is third-party data purchased and appended to customer data to help better understand PG&E customers’ level of acculturation and language preference.

PACIFIC GAS AND ELECTRIC COMPANY
APPENDIX 4
NATIVE AMERICAN TRIBAL ENTITIES IN PG&E'S
SERVICE AREA



Native American Tribal Entities in PG&E's Service Area

76 federally recognized tribes inside PG&E territory.

- **Casinos:** 62 of the 109 California tribes own 69 casinos, California is the nation's largest Indian gaming state with total revenues of \$7 billion annually,
- **Land:** Land ownership varies from rancherias managed by tribes to large tracks of land held in Trust
- **Membership:** Tribes range in size from five to 5,000 members and are located areas ranging from rural to highly populated cities.



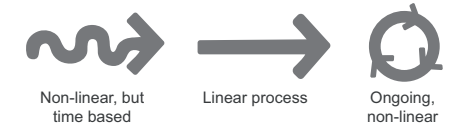
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APPENDIX 5A

CARE AND ESA ACQUISITION CUSTOMER JOURNEY

Key:

The actual customer journey is non-linear from end-to-end. Customers may or may not follow each of the stages, and may go back or move ahead based on their individual needs and experiences.



DOING	Aware but unengaged	Willing to engage	Learning more	Applying	Sticking with the process (ESA)	Sticking with the process (CARE)	Talking to others
<p>DOING</p> <ul style="list-style-type: none"> Making immediate judgements Filing information away Prioritizing other things Ignoring it Seeing messages about other programs (PG&E, statewide) 	<p>DOING</p> <ul style="list-style-type: none"> Asking more questions Having casual discussions with others Still filing information away, for future consideration Thinking about priorities, still juggling Light research 	<p>DOING</p> <ul style="list-style-type: none"> Having purposeful discussions, asking friends and family about these benefits Calling PG&E Visiting PG&E site Asking at payment center Googling 	<p>DOING</p> <ul style="list-style-type: none"> Formal application (online, in person, mail, phone, etc.) Communicating with a contractor (ESA) Asking for help 	<p>DOING</p> <ul style="list-style-type: none"> Making appointments Missing appointments Dropping out Asking lots of questions Getting to know contractor Getting their improvements, new appliances Talking about the experience (good or bad) 	<p>DOING</p> <ul style="list-style-type: none"> Confirming savings on bills Reviewing Welcome Kit Receive PEV notice Receive High Usage PEV Checking to make sure they still qualify based on the guidelines before reapplying Nothing 	<p>DOING</p> <ul style="list-style-type: none"> Telling other people Helping friends and family through the process Saying negative things (possible) Feeling positively toward PG&E Investigating/open to other programs 	
<p>THINKING</p> <ul style="list-style-type: none"> <i>I'll think about this another time</i> <i>What's the catch?</i> <i>I don't get it, don't understand the program and don't care to spend the time to</i> <i>This sounds hard</i> <i>I don't qualify</i> 	<p>THINKING</p> <ul style="list-style-type: none"> <i>Am I really eligible?</i> <i>Would I be taking from others who need it more?</i> <i>How much would I really save?</i> <i>I don't know anyone who does this</i> <i>I get it, mostly</i> <i>This is interesting, maybe later</i> <i>I'll think about it</i> <i>I think this could benefit me</i> <i>I have bigger issues to deal with</i> <i>Will this hurt me (immigration status, other benefits)</i> 	<p>THINKING</p> <ul style="list-style-type: none"> <i>How does it all work? What are the steps?</i> <i>Still, what will the benefit to ME be?</i> <i>This looks like a lot of work</i> <i>I think I'd like to learn more</i> <i>I quit, this is too hard</i> <i>Will I get in trouble with my landlord? Should this be their job? (ESA)</i> <i>It's frustrating that I can't do research in my own language</i> 	<p>THINKING</p> <ul style="list-style-type: none"> <i>I'm happy to be getting this benefit</i> <i>Woah, the application has a LOT of questions</i> <i>I need help with this process</i> <i>Is this really worth all of this work?</i> <i>I quit, this is too hard</i> <i>Why would anyone do this?</i> <i>What are they doing with all of this information? Will it hurt me?</i> 	<p>THINKING</p> <ul style="list-style-type: none"> <i>I'm excited about my new stuff! But, this is a lot of appointments</i> <i>It's hard to miss this much work, why is all this necessary?</i> <i>Is this really worth all of this work?</i> <i>I don't like this contractor</i> <i>I quit, this is too hard</i> <i>I'm not getting what I thought I would</i> <i>I don't want all these people in my house</i> 	<p>THINKING</p> <ul style="list-style-type: none"> <i>That was pretty easy to understand and apply</i> <i>I'm happy to be getting a discount on my bill</i> <i>The savings help me with a little extra to pay other bills</i> <i>The savings on my bill are worth the extra paperwork to stay on CARE</i> <i>I hope I filled everything out correctly (esp. non-English speakers)</i> <i>I don't want to lose my discount but I don't understand what I need to do to provide my income verification</i> <i>I don't want to provide my personal information</i> 	<p>THINKING</p> <ul style="list-style-type: none"> <i>I'm glad that's done, and happy about my new stuff/discount (ESA)</i> <i>I really did save/am saving a lot</i> <i>That was a lot of work (ESA) but worth it</i> <i>I didn't save as much as I thought</i> <i>PG&E helped me when I needed it</i> <i>My CARE discount is more than I thought</i> 	
<p>FEELING</p> <ul style="list-style-type: none"> Intrigued Uninterested Irritated 	<p>FEELING</p> <ul style="list-style-type: none"> Optimistic Confused Overwhelmed 	<p>FEELING</p> <ul style="list-style-type: none"> Empowered Confused Discouraged 	<p>FEELING</p> <ul style="list-style-type: none"> Supported Stuck Defeated 	<p>FEELING</p> <ul style="list-style-type: none"> Excited Weary Defeated 	<p>FEELING</p> <ul style="list-style-type: none"> Happy Relieved Overwhelmed 	<p>FEELING</p> <ul style="list-style-type: none"> Enthusiastic Done and over Deceived 	

Customer Journey Messaging Strategy

STAGES

	Aware but unengaged	Willing to engage	Learning more	Applying	Sticking with the process (ESA)	Sticking with the process (CARE)	Talking to others
<p>MESSAGING STRATEGIES <i>How do we address the mindset barriers at this stage?</i></p> <p>Personalize the benefits</p> <p>Encourage questions, provide clear resources/CTAs just for answers (versus straight to enrollment)</p> <p>Clarify eligibility up front</p>	<p>Motivate with outcomes - savings/comfort</p> <p>Underscore simplicity and security of enrollment</p> <p>Continue supportive CTAs</p>	<p>Underscore simplicity of enrollment</p> <p>Provide more detailed step-by-step information</p> <p>Help visualize the end-state, immediate benefits (e.g. new appliances) (ESA)</p> <p>Reinforce eligibility requirements</p>	<p>Reinforce personalizing messages/benefits to keep motivation high</p> <p>Provide resources to help with application - point to phone, CBOs, etc.</p>	<p>Provide step-by-step instruction to meet expectations</p> <p>Help visualize the end-state, immediate benefits (new appliances)</p>	<p>Reinforce savings messages</p> <p>Provide detail on income requirements and reassurance about what is done with the information</p> <p>Provide detail on what happens after the application (as the wait time does not include communications back out to customers)</p>	<p>Reinforce actual benefit - final savings calculations, close the loop</p> <p>Integrate communications to keep them engaged with PG&E, other programs</p> <p>Encourage referrals to help friends and family</p>	
<p>MESSAGING EXAMPLES <i>How might we communicate at this stage?</i></p>	<p>CARE You could save \$[XX] on your energy bill each month.</p> <p>Claim your discount now and save on your energy bill each month.</p>	<p>CARE Once enrolled, your discount will automatically be applied to your energy bill each month.</p> <p>You will be required to reapply for CARE each year through a simple online process that takes approximately [X] minutes.</p>	<p>CARE Thank you for filling out your application for the California Alternate Rates for Energy Program. If approved, we estimate you'll save approximately \$[XX] per month on your energy bills.</p>	<p>ESA Thank you for filling out your application for the Energy Savings Assistance Program. Now that you've been approved for no-cost home upgrades, we'll help you complete the following steps in order to successfully install them in your home: [x, y, z]. This process will take approximately [XX]-[XX] days to complete.</p>	<p>CARE Thank you for your application. You will be notified of your acceptance or ineligibility into the California Alternate Rates for Energy Program within [XX] days. To check your application status, visit [URL] or call a PG&E representative at [XXX-XXX-XXXX].</p> <p>You've been accepted into the California Alternate Rates for Energy Program at a discounted rate of [XX]%. Your discount will automatically be applied on your next billing cycle on [DATE].</p> <p>Your California Alternate Rates for Energy discount is indicated on your energy statement here. [VISUAL OF BILL]</p> <p>As an eligible member of the California Alternate Rates for Energy Program, you likely qualify for no-cost home energy upgrades through the Energy Savings Assistance Program and other cost-savings programs from PG&E. To learn more about our programs and their eligibility requirements, visit [URL] or call a PG&E representative at [XXX-XXX-XXXX].</p>	<p>CARE You are currently saving [XX] per month through the California Alternate Rates for Energy Program. If you know someone who may also benefit from this program, tell them to visit [URL] to learn more about the program, check their eligibility, and apply for their discount online.</p> <p>As an eligible member of the California Alternate Rates for Energy Program, you likely qualify for no-cost home energy upgrades through the Energy Savings Assistance Program and other cost-savings programs from PG&E. To learn more about our programs and their eligibility requirements, visit [URL] or call a PG&E representative at [XXX-XXX-XXXX].</p>	
<p>CARE The California Alternate Rates for Energy Program provides discounts of up to [X]% on your energy bills.</p> <p>Did you know you could save up to \$[XX] on your energy bills?</p> <p>You qualify for a statewide program that provides discounts of up to [X]% on your energy bills.</p>	<p>ESA Upgrade to newer appliances and lighting at no cost to you.</p> <p>Stay warm in the winter and cool in the summer - and lower your energy costs year round.</p> <p>Depending on the upgrades you select, a project may take. [X]-[X] weeks.</p>	<p>ESA On average, projects take between [X]-[X] weeks and require up to [X] visits from an Energy Savings Assistance Program contractor, because of [x, y, z reasons why certain types of projects include multiple visits based on pre-installation measurements, time/complexity of installation, need for follow-up, etc.]</p> <p>For a step-by-step walk through of the process, visit URL.com</p>	<p>ESA Thank you for filling out your application for the Energy Savings Assistance Program. If approved, you'll be eligible to receive home improvements including [x,y,z].</p> <p>Talking to a contractor can be complicated. We're here to help you know what to look for and provide you with a list of the right questions to ask. Call [XXX-XXX-XXXX] or visit [URL] to get started.</p>	<p>You have successfully completed the step. The next step is [STEP NAME]. Here's what happens next: [x, y, z.]</p> <p>PG&E is here to help you know what to look for and provide you with a list of the right questions to ask. Call [XXX-XXX-XXXX] or visit [URL] to get started.</p> <p>Your approved PG&E contractor will arrive at your home on [DATE] at approximately [TIME] to complete [WORK]. This appointment should take approximately [X] hours to complete. After this work is done, you will have [X] more contractor visits to successfully complete your project.</p> <p>Unsure of where you are in the process? Call us anytime at [XXX-XXX-XXXX] for an update on your project status or to get help completing any of the steps in the process.</p>	<p>As an eligible member of the California Alternate Rates for Energy Program, you likely qualify for no-cost home energy upgrades through the Energy Savings Assistance Program. To learn more about the program and your eligibility, visit [URL] or call a PG&E representative at [XXX-XXX-XXXX].</p>	<p>ESA Thank you for participating in the Energy Savings Assistance Program. If you know someone who may benefit from this program, tell them to visit [URL] to learn about the program, check their eligibility, and apply for no-cost upgrades online.</p> <p>As an eligible member of the Energy Savings Assistance Program, you likely qualify for the California Alternate Rates for Energy Program and other cost-savings programs from PG&E. To learn more about our programs and their eligibility requirements, visit [URL] or call a PG&E representative at [XXX-XXX-XXXX].</p>	
<p>ESA The Energy Savings Assistance Program provides no-cost home upgrades to qualified participants Did you know you could qualify to receive no-cost home energy upgrades?</p> <p>You may be eligible for a statewide program that provides no-cost home energy upgrades, including [x, y, and z], if...</p>	<p>ESA & CARE Enrolling only takes a few simple steps. Applying is secure and confidential, and you will not be asked to provide proof of income.</p>	<p>ESA & CARE Follow these simple steps to enroll: [a, b, c].</p>	<p>ESA & CARE Need help filling out this application? We're here to help. Call [XXX-XXX-XXXX] to speak with a representative who can walk you through your application, or visit [URL] for easy instructions on how to complete each section of your application.</p>	<p>App5A-2</p>	<p>ESA & CARE Thank you for your participation in the [PROGRAM NAME] program. If you have questions on anything [PROGRAM NAME] related, we're always here to help.</p>	<p>ESA & CARE Thank you for your participation in the [PROGRAM NAME] program. If you have questions on anything [PROGRAM NAME] related, we're always here to help.</p>	

PACIFIC GAS AND ELECTRIC COMPANY
APPENDIX 5B
LOW INCOME COMMUNICATIONS TACTICAL PLAN

PACIFIC GAS AND ELECTRIC COMPANY

APPENDIX 6

**CARE HIGH USAGE POST-ENROLLMENT VERIFICATION AND
APPEALS PROCESS**

CARE High Usage Post-Enrollment Verification and Appeals Process

Ordering Paragraph 101 in D.12-08-044 required the electric Utilities to implement a CARE High Usage Post-Enrollment Verification Process. Additionally, Ordering Paragraph 101(b) required the Utilities to develop an expedited appeal process for those customers who may believe that they have been wrongfully de-enrolled to allow them the process to submit an appeal of the de-enrollment documenting their concerns and demonstrating their usage as “necessary, basic and legitimate household energy usage.” The Utilities implemented these processes in 2014.

Ordering Paragraph 87 in D.16-11-022 required the Utilities to align their internal CARE High Usage Appeals Processes with the goal of equality and uniformity across service territories, using the same criteria and evaluation of customer appeals.

High Usage Process

Stage 1 - Customers with electric usage above 400 percent of baseline in their most recent monthly billing cycle will have 45 days to provide a standard income verification document (IRS Transcript of Tax Return or Verification of Non-Filing) and agree to participate in the Energy Savings Assistance (ESA) program – including allowing access to all portions of the metered property for a post-participation inspection. Customers who do not respond will be removed from the CARE program and prohibited from reenrolling in the CARE program for 24 months or until compliance with the stated requirements.

Stage 2 - Customers who successfully complete Stage 1 will be given a priority referral to the ESA program. Customers who *do not* meet the ESA eligibility requirements (due to prior program participation within the past 10 years, not meeting the three-measure minimum, landlord refusal, etc.) will move directly to Stage 3. Customers who *do* meet the ESA eligibility requirements will be given 45 days (or longer depending on contractor availability) to complete their ESA participation and move to Stage 3. ESA program contractors will refer these customers to the Medical Baseline program, if applicable, and inform the customer of the appeal process. Relevant load information (equipment or lighting with uncommonly high electricity usage requirements) will be noted on the customer’s account regarding legitimate high usage for future reference in the event of an appeal. Customers who fail to keep multiple appointments, do not provide access to the metered property, refuse to allow a post-participation quality control inspection, or decline to participate will be removed from CARE and prohibited from re-enrolling for 24 months or until compliance with the stated requirements.

Stage 3 - Customers who successfully complete Stage 2 will be notified that, beginning in 90 days, their electric usage must not exceed 600 percent of baseline in any monthly billing cycle. A customer will be allowed three monthly billing cycles from notification to reduce, and/or maintain, their monthly electric usage below 600 percent of baseline. The notification will include, based on the customer’s baseline territory and end use, an example of the monthly kWh usage that would exceed the 600 percent of baseline threshold for both summer and winter seasons. The notification will also include

information on Medical Baseline, and other resources available to assist the customer to reduce their electric usage.

Appeal Process

At the conclusion of 90 days following the notification in Stage 3, and within two years thereafter, if the customer's electric usage exceeds 600 percent of baseline in any monthly billing cycle, the customer will be removed from CARE and barred from the program for 24 months. Customers who believe they have been wrongfully removed will be allowed to submit an expedited appeal. The expedited appeal process detailed below will provide customers who feel they have wrongfully been removed with an avenue to justify electric usage exceeding 600 percent of baseline:

1. Customers will be mailed a letter with information on the expedited appeal process and given **15 days** from the date on the letter to respond.
2. To appeal, customers will be required to document their concerns and provide a detailed explanation demonstrating their usage as necessary, basic, and legitimate household energy usage.
3. Customers will be allowed to respond via email, fax, or mail to a CARE Operations Supervisor in charge of expediting the appeal.
4. A Utility panel, which may consist of representatives from CARE, ESA, and/or Customer Relations, will convene monthly to review the customer appeals and endeavor to determine if their usage appears to be "necessary, basic, and legitimate."
5. The panel will review the customer's annual usage, household information (size and income), home information (number of rooms, size, age, estimated value), ESA assessment information (enrollment date, eligibility, account notes), and the customer's appeal. Appeals will be considered on a **case-by-case** basis. Customers with medical situations, approved medical marijuana documentation, large households, older homes, well pumps, and/or usage that is below 600 percent of annual baseline are more likely to be approved.
6. Customers will receive written notice of approval or denial of the appeal **within 15 days** of receipt in order to avoid re-billing.
7. If the Utility makes the determination that there is reasonable justification demonstrating "necessary, basic and legitimate household energy usage," the customer will be re-enrolled in CARE.
8. Customers that respond late, causing a delay in the 30-day appeal process, will still be re-enrolled in CARE if their appeal is approved. However, they will not be automatically eligible to be re-billed on CARE for any months in which they were billed on Non-CARE rates.
9. If the Utility is unable to re-enroll an approved customer in CARE within 15 days of receipt, the customer will be eligible to be re-billed for the discount missed, as long as they submitted the appeal within the required 15-day timeframe.

10. If the appeal is denied by the Utility, the customer will be advised that they may seek the Commission's assistance by contacting the CPUC Consumer Affairs Branch (CAB) within 15 days. Contact information will be provided in the denial letter. The CAB will refer all CARE High Usage Appeals to Energy Division staff for review.
11. The Utilities have provided Energy Division a point of contact to respond to any questions Energy Division may have during the period that the appeal is before the Commission, and who Energy Division can inform regarding the result of the appeal.
12. If Energy Division approves the customer's usage as "necessary, basic, and legitimate," the Utility will re-enroll the customer in CARE and re-bill them for the discount missed, as long as the customer submitted the appeal within the required 15-day timeframe.

PACIFIC GAS AND ELECTRIC COMPANY

APPENDIX 7

BIOGRAPHICAL STATEMENT: SHANNON HULBRIDGE, CEO

REDBRIDGE, INC.

Shannon Hulbert

REDBRIDGE CEO & FOUNDER OF THE INTER-TRIBAL ENERGY & TECH TOUR

Redbridge President and CEO, Shannon Hulbert, is a 2013 recipient of NCAIED's Native American 40 Under 40. A member of the Yurok Tribe of Northern California, Shannon grew up on the Hoopa-Yurok Indian Reservation and has family ties to San Carlos Apache and Salt River Pima. She brings over 17 years of marketing, project management, and brand development experience in energy, technology, and Native American markets.

Prior to launching Redbridge, Shannon served as either lead designer or contributing designer for energy-efficiency programs with Portland Energy Conservation, Inc. (PECI), a program management contractor for utility energy programs. Shannon has provided lead creative and web development for over 25 brand launches in the utility industry, including 6 ENERGY STAR award winning programs for 6 years.

Programs include:

- PG&E EnergySmart Grocer (from launch for 2 years)
- PacifiCorp's Products & Lighting Programs
- ThermWise Homes, Products & Multifamily Programs
- BPA's Change a Light Program
- EnergyTrust Lighting & Homes Program
- Retrocommissioning Program for PG&E, SDG&E, and SCE
- SCE Lights for Learning Program

In 2013, Shannon founded The Inter-Tribal Energy & Tech Tour. The Tour is the first road tour/summer camp committed to educating tomorrow's tribal leadership on energy, tech and partnership potential. Native American students are selected from regional tribes to participate in a memorable 7-day tour of energy and technology projects. To date, the Tour has received participation from over 40 Native American tribes and support and participation from over 20 different organizations, including Facebook, Navajo NOVA Corporation, and Ecotrust. In August, the tour will launch from LinkedIn's datacenter in Portland to visit Warm Springs Reservation, Yurok Tribe, Blue Lake Rancheria, Lawrence Livermore National Laboratory, Soboba Tribe, and Southern California Edison.

In the datacenter space, Redbridge has clients in the MSP and cloud markets and has served as the agency of record for Opus Interactive since 2011. The cloud, colocation, and managed services company has achieved 30% growth year over year since 2012. Redbridge provides all marketing and PR for the company



2013 NCAIED Native American 40 Under 40

This prestigious annual award recognizes 40 emerging American Indian leaders from across the Country who have demonstrated leadership, initiative, and dedication and made significant contributions in business and/or in their community.

OUR WORK IN INDIAN COUNTRY

Redbridge has worked with a number of tribes and Native American-focused organizations, including:

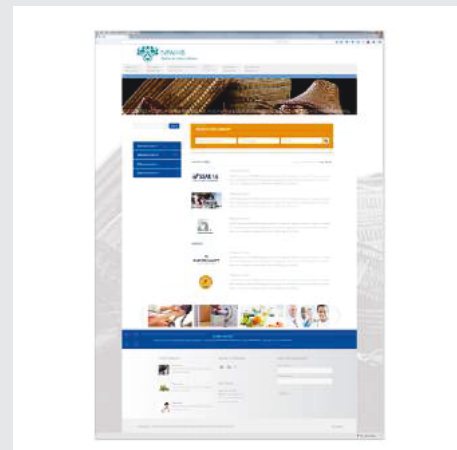
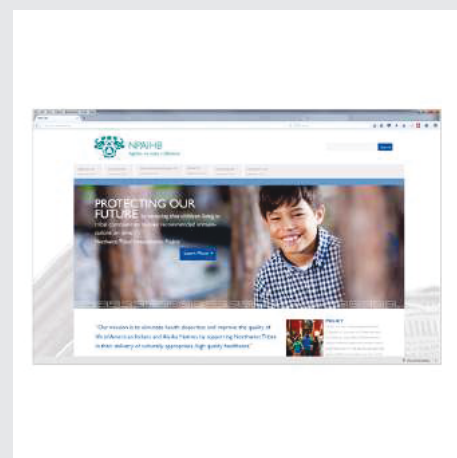
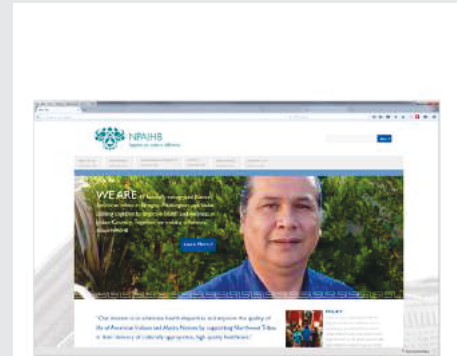
- **WeRNative** - A comprehensive health resource for Native youth, by Native youth, providing content and stories about the topics that matter most to them.
- **NaraNW** - Founded in 1970, the mission of Native American Rehabilitation Association of the Northwest, Inc (NARA) is to provide education, physical and mental health services and substance abuse treatment that is culturally appropriate to American Indians, Alaska Natives and other people in need.
- **THRIVE** - Tribal Health: Reaching out InVolves Everyone (THRIVE) provides regional support for suicide prevention. THRIVE also continues to implement the Northwest Suicide Prevention Tribal Action Plan and provides suicide prevention capacity-building assistance to the 43 Member Tribes of the NPAIHB.
- **Northwest Portland Area Indian Health Board** - Established in 1972, the Northwest Portland Area Indian Health Board (NPAIHB or the Board) is a non-profit tribal advisory organization serving the forty-three federally recognized tribes of Oregon, Washington, and Idaho.
- **Inter-Tribal Energy & Tech Tour** - The Inter-Tribal Energy & Tech Tour is the first summer camp committed to educating tomorrow's tribal leadership on energy, technology and partnership potential. Native Youth are selected from regional tribes to participate in a road tour of native and non-native projects and places to generate energy, environmental stewardship, and technology awareness in Indian Country.
- **ANA Western Region** - The Administration for American Indians offers training and technical assistance. ANA promotes the goal of economic and social self-sufficiency for American Indians, Alaska Native, Native Hawaiians and the Native peoples of Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.
- **California Rural Indian Health Board** - The California Rural Indian Health Board (CRIHB) was formed to provide a central focal point in the Indian health field in California for planning, advocacy, funding, training, technical assistance, coordination, fund raising, education, development and for the purpose of promoting unity and formulating common policy on Indian health care issues.

Website Design and Development

ANA Western

NaraNW

NPAIHB



Content Development

Redbridge worked closely with WeRNative to provide Native Youth-focused blog articles focused on energy related topics.

#WeRNative Social Media Photo Contest

Launched a 30-day social media campaign to generate awareness for the Monthly Photo contest. The theme for the content was #weRnative and native youth were encouraged to submit selfie pictures on social media channels. Participants even included contestants for Miss Indian NAU Pageant (pictured right) and the campaign received national attention.

Suicide Prevention Marketing Toolkit

Poster design and web content for youth-focused awareness and prevention toolkit distributed to Education Coordinators of the 14 participating tribes.

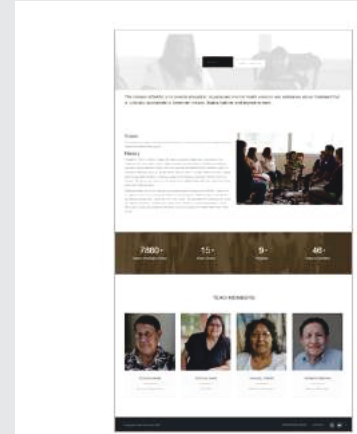
Social Media and PSA Video

Redbridge has selected for the past 2 years to assist with generating awareness for the native youth 2016 THRIVE Conference in Portland. Redbridge facilitates a marketing bootcamp with Native Youth participants to generate student-led marketing campaigns. In 2016 students created an awareness PSA that generated over 800,000 views. 2017 students created a photo challenge contest to initiate in September.

Inter-Tribal Energy & Tech Tour - Materials and Website

Redbridge has provided all marketing services related to the Tour since 2012. The annual Summer Camp introduces Native American youth to energy and tech projects on and off the reservation.

- Sponsorship campaigns with email and marketing materials to generate funding for the upcoming tour.
- Awareness campaigns to generate interest and awareness with students. This includes flyers, radio interviews with Native radio stations, and in-person assemblies at regional schools.
- Tour Stop Outreach campaigns to learn about new and interesting energy and tech projects and organizations and secure site visits for students.
- Tour Materials to provide the students and student families with information on the tour.
- PR Campaign to generate media support for the Tour.
- Social Media Campaign to provide information and generate awareness and support for the Tour through social media channels.
- Web content to generate interest in the tour and share information.



PACIFIC GAS AND ELECTRIC COMPANY
APPENDIX 8
RATE REFORM CBO TRACKING METRICS

APPENDIX 8

Rate Reform CBO Tracking Metrics

PG&E is meticulously tracking metrics tied to community outreach, leveraging our relationships with Community-Based Organizations (CBOs). These metrics are outlined as follows:

Channel	Tracking Number of Community Partners	Tracking Number of People Reached
CARE Community Outreach Contractors	<ul style="list-style-type: none"> • Number of contracts • Number of CE Partners 	<ul style="list-style-type: none"> • Track number of CBO staff trained on residential rate awareness • Track number of events • Track number of people touched at each even number of new CARE Enrollments • Number of Medical Baseline enrollments • Number of ESA enrollments
LIHEAP	<ul style="list-style-type: none"> • Program Manager tracks • Number of CE Partners 	<ul style="list-style-type: none"> • Track number of CBO staff trained on residential rate awareness
REACH	<ul style="list-style-type: none"> • Contract with program administrator • Number of CE Partners 	<ul style="list-style-type: none"> • Track number of CBO staff trained on residential rate awareness
Health Outreach Workers Initiative	<ul style="list-style-type: none"> • Contract with program administrator • Number of CE Partners 	<ul style="list-style-type: none"> • Track number of CBO staff trained • Track number of events Track number of people touched at each event
After-school Initiative (Energenius)	<ul style="list-style-type: none"> • Contract with program administrator • Number of CE Partners 	<ul style="list-style-type: none"> • Track number of CBO staff trained • Track number of events • Track number of people touched at each event
Community Ambassadors	<ul style="list-style-type: none"> • Number of contracts with Community Ambassador • Number of CE Partners 	<ul style="list-style-type: none"> • Track number of CBO staff trained • Track number of events • Track number of people touched at each event
Communities of Color Advisory Group	<ul style="list-style-type: none"> • Number of member organizations represented in the Advisory Group • Number of CE Partners 	<ul style="list-style-type: none"> • Track number of attendees at each advisory group meeting