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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

Rulemaking 15-03-010

ASSIGNED COMMISSIONER'S SCOPING MEMORANDUM AND RULING

Overview

This Scoping Memo and Ruling (Scoping Memo) sets forth the category, issues, need for hearing, schedule, and other matters necessary to scope Phase II of this proceeding pursuant to Public Utilities Code § 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure.¹

1. Background

This proceeding implements Assembly Bill (AB) 2672, codified as Public Utilities (Pub. Util.) Code Section 783.5.² Legislative analysis of the bill found that, where natural gas is unavailable, wood stove, propane or electricity is used for space and water heating.³ The analysis also found that "for low income

¹ California Code of Regulations, Title 20, Division 1, Chapter 1: hereinafter, Rule or Rules.

² Unless otherwise stated, all references to code sections are to the Public Utilities Code.

³ August 25, 2014 Assembly Floor Analysis for AB 2672.

households, the use of natural gas or electricity can decrease utility costs, increase overall financial health, and provide a safer means of heating and cooling space and water.”

On March 26, 2015, the California Public Utilities Commission (Commission) issued an Order Instituting Rulemaking (OIR) to address the enactment and implementation of Section 783.5.

Section 783.5 required the Commission first to identify disadvantaged communities in the San Joaquin Valley meeting specific income, geographic, and population requirements and then to analyze the economic feasibility of certain energy options for the identified communities. The three categories of energy options specified by statute are: (a) extending natural gas pipelines, (b) increasing existing program subsidies to residential customers, and (c) other alternatives that would increase access to affordable energy.

Phase I of this OIR was categorized as quasi-legislative and identified eligible disadvantaged communities. The Commission adopted Decision (D.) 17-05-014 on May 11, 2017. This decision adopted the methodology for identification of communities eligible under Section 783.5 and provided guidance for conducting the future economic feasibility study that will be completed in Phase III of this proceeding.

A prehearing conference (PHC) for Phase II was held on June 9, 2017 in Fresno. The purpose of the PHC was to determine the parties, scope, and other procedural matters for Phase II of the proceeding. On June 22, 2017 a ruling was issued directing the Office of Ratepayer Advocates (ORA) to provide a proposed framework for data gathering, and Self-Help Enterprises, Center for Race Poverty and the Environment, and Leadership Council (the Pilot Team) to provide a framework for potential pilot projects. All parties were directed to

provide comments on the proposed frameworks. On July 10 and 11, 2017 two Community Energy Option Workshops, one in West Goshen, and one in Ducor occurred. On August 15, 2017 an additional ruling requested the parties to provide comments on a number of questions for consideration by the assigned Commissioner prior to issuance of a Phase II Scoping Memo. This same ruling set a second PHC for September 6, 2017. On August 22, 2017 the assigned ALJ issued a ruling extending the deadline for serving and filing the additional information requested in the August 15, 2017 Ruling from August 30, 2017 to September 20, 2017. The second PHC was held on September 6, 2017 in Fresno. The parties filed responses with additional information on September 20, 2017 in accordance with the August 30, 2017 ruling.

Phase II of this proceeding will include two tracks and is categorized as ratesetting. Track A will address authorization and implementation of pilot projects that are intended to provide cleaner and more affordable energy options to propane and wood burning for a select number of the disadvantaged communities identified in Phase I of the proceeding. Track B will address data gathering needs for evaluation of economically feasible potential energy options for all identified communities in Phase I. It is anticipated that the Phase II decision will adopt a data gathering plan and provide direction as to the collection of data.

Phase III of this proceeding will be opened at a later date to a) evaluate progress with implementation of the authorized Pilot Projects; and b) review the data collected pursuant to an approved Data Gathering Plan created in Phase II. Phase III, will also utilize data collected in accordance with the approved Data Gathering Plan and evaluation of pilot projects to conduct the economic feasibility study required by AB 2672.

2. Scope of Phase II

The OIR sought comments twice on a number of questions related to the process and substance for moving forward with implementation of pilot projects and data gathering within the counties identified in AB 2672. Numerous parties, including Greenlining Institute, ORA, the Center for Accessible Technology (CforAT) and The Utility Reform Network (TURN), Grid Alternatives, the Sierra Club, the City of Fresno, Self-Help Enterprises, the Leadership Counsel, Center for Race, Poverty, and the Environment, Pacific Gas & Electric (PG&E), Southern California Gas Company (SoCal), Southern California Edison (SCE) filed comments on the proposed list of topics, preliminary scope, categorization, and need for hearings. This created a broad record to inform the initial discussion at both PHCs and to determine the scope of Phase II.

Phase I of the proceeding identified “disadvantaged communities” consistent with the statutory requirements of Section 783.5.⁴ The Commission identified 170 disadvantaged communities within the 8 counties targeted in AB 2672. This phase of the proceeding will focus on authorization for implementation of pilot projects. The pilot projects will focus on a subset of 170 identified communities (*see* 12 communities identified below and in Appendix 1 to Attachment A) and provide direction on data gathering needed to conduct the

⁴ A “disadvantaged community” is a San Joaquin Valley Community that meets all of the following criteria: 1) At least 25% of the residential households with electrical service are enrolled in the CARE program pursuant to Pub. Util. Code § 739.1; 2) Has a population greater than 100 persons within its geographic boundaries as identified by the most recent survey; 3) Has geographic boundaries no further than seven miles from the nearest natural gas pipeline operated by a gas corporation; and 4) “San Joaquin Valley” means the counties of Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare.

economic feasibility analysis required by AB 2672. Phase II of this proceeding has two tracks (A and B) and both are categorized as ratesetting.

Track A – Pilot Projects

Track A will address development and authorization to implement pilot projects that will provide clean and affordable energy options to propane and wood burning for a select number of the disadvantaged communities identified in Phase I of the proceeding. Twelve (12) communities were identified by the parties in prehearing case management statements as eligible hosts for a pilot project. No party has opposed focusing our efforts on these 12 communities for purposes of initial review of pilot projects in this proceeding. These 12 communities are Allensworth, Alpaugh, Cantua Creek, Ducor, Fairmead, Lanare, Le Grand, La Vina, Monterey Park Tract, Seville, California City, and West Goshen (also *see* Appendix 1 to Attachment A of this Ruling).⁵

At least one all-electric pilot proposal must be submitted for each community. If a natural gas extension option is presented, an all-electric option must also be provided by the relevant utility.⁶ If there is not a natural gas extension option proposed there must be a cost comparison between the all-electric option and what a natural gas extension project would cost⁷

⁵ California City was recommended by some parties and there was no objection in comments by other parties. California City community members also made several requested that California City be considered for a pilot project.

⁶ Where there is overlap of service territories, for example where a community is within SCE's electricity service territory and SoCal Gas' natural gas service territory, SCE would submit an all-electric option for a pilot project, and SoCal Gas may submit the natural gas extension option for a pilot project.

⁷ The cost comparison must include both cost for individual households (all electric option/natural gas extension), and cost for all households in the community requiring upgrade to all-electric or that would need a natural gas line extension.

collectively and per household with the pilot proposal. The Utilities will submit proposals⁸ following the Pilot Project Content and Form Guidelines set out in Attachment A to this scoping memo. Alternative pilot proposals may be proposed by non-utility parties in comments on the pilot proposals. Any alternative proposal provided must follow the Pilot Project Content and Form Guidelines set out in Attachment A.

Track A will authorize the implementation of pilot projects that provide on-the-ground, real-time information as to the effectiveness of implementation measures designed to bring affordable energy to disadvantaged communities in the San Joaquin Valley. These pilot projects will also provide data and information that will benefit future project implementation and allow for replication on a broader scale in the San Joaquin Valley and throughout the state.

Track B – Data Gathering Plan

The OIR described economic feasibility as the “process of determining whether a new venture is worth the cost and time investment.” For example, the economic feasibility of extending gas pipelines would necessarily include review of terrain and actual distance to the distribution pipeline. The economic feasibility of serving customers’ energy needs with electricity only (an all-electric option) would include not only costs for rewiring, and appliances, but also how an all-electric rate will compare to monthly energy costs for natural gas extension

⁸ Initial proposals for some of the 12 communities were provided in party comments submitted on September 20, 2017. The information required for a complete proposal is found in Attachment A to this ruling. A proposal(s) for each of the 12 identified communities is to be provided consistent with this ruling. Any non-utility party that intends to submit a separate pilot proposal for any of the 12 communities should do so with their comments on the utilities proposals. Any non-utility proposal submitted must include all of the information set out in Attachment A. To the extent any required information is not or cannot be provided the party submitting the proposal must explain in detail why such information was not included.

for heating and cooking. Additionally, for the purpose of this proceeding, “economic feasibility” will also include considerations such as public health, enhancing public safety, and other factors. Furthermore, depending on the type of energy alternatives under review, factors used to evaluate economic feasibility may also change.

The economic feasibility analysis will require us to establish a baseline of current energy conditions, and then to evaluate the costs and benefits of the proposed energy options. Therefore, the Data Gathering Plan addressed in this phase of the proceeding will need to include all information necessary to address each of these considerations.

Section 783.5(b)(2)(C) directs the Commission to consider other alternatives that would increase access to affordable energy in the identified communities. Although the economic feasibility analysis will not take place until Phase III, it is important to ensure that the data needed to conduct this analysis is gathered, and that appropriate costs assessments and comparisons are conducted in considering how best to increase access to affordable energy in the 170 identified communities.⁹

⁹ One potential tool to be used is the CalEnviroScreen developed by The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA). It is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. CalEPA has used the tool to designate California communities as disadvantaged pursuant to the California Communities Healthy Air Revitalization Trust. Additionally, the Utilities currently collect significant data on the communities identified in Phase I through other low-income programs that can be broken down and utilized for purposes of this proceeding. Given the demographic diversity of the 170 identified communities, multiple tools will be needed to collect data and assess the factors needed to conduct the economic feasibility analysis.

Track B will address data gathering needs for evaluation of economically feasible energy options and finalize a Data Gathering Plan consistent with attachment C to this Ruling. The information provided by parties in Track B will assist the Commission in determining the information needed and methodology for conducting an overall economic feasibility study in Phase III.

Energy Programs and Resources to Fund AB 2672 Energy Options

Section 783.5(b)(2)(A) directs the Commission to analyze the option of extending natural gas lines, or other alternatives that will provide affordable energy to the existing communities. Phase II of this proceeding will develop the tools necessary to quantify costs and benefits associated with those options applied to different communities.

Section 783.5(b)(2)(B) directs the Commission to consider “increasing subsidies” for electricity for residential customers in those disadvantaged communities. Existing electric subsidies over which the Commission has jurisdiction include, but are not limited to, California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), and Medical Baseline Allowance.

Section 783.5(b)(2)(C) also directs the Commission to consider “other alternatives” that would increase access to affordable energy in those disadvantaged communities that the Commission deems appropriate. Other such programs and tariffs that may be utilized to satisfy the requirements of AB 2672 include the Energy Savings Assistance Program, the California Solar Initiative Solar Thermal program, Multifamily Affordable Solar Housing (MASH), Single Family Affordable Solar Housing (SASH), Solar on Multifamily Affordable Housing (SOMAH) program, and Net Metering (NEM). Our initial examination of “effectiveness” of utilizing existing programs for AB 2672 will include

measuring the penetration rate of each program in each disadvantaged community by quantifying the number of program participants among all eligible customers, as well as where there may be additional overlap for utilization for these programs to fund identified projects in the disadvantaged communities that meet the goals of AB 2672.

The Utilities are directed to, and other parties may, examine each of these programs to determine if existing funds already allocated can be utilized for projects meeting the goals of AB 2672, whether additional resources should be proposed in future applications for any of these programs, and/or whether new programs are needed to ensure access to clean affordable energy in the identified communities in the San Joaquin Valley. The Utilities are directed to provide an overview of each program, whether and to what extent each program services the identified 170 communities, as well as recommendations on how the programs could be adjusted to serve a greater number of the disadvantaged communities identified. Parties will have an opportunity to comment on this overview, which may be utilized for reaching a decision in both track A and B of this phase of the proceeding. All parties are also directed to address what if any new programs should be considered by the Commission to serve these communities in their responses to the questions set out in Attachment B to this scoping memo.

Overview Phase II

Pursuant to § 783.5, and taking into account parties' comments, Phase II of this proceeding will address the following issues:

- A. Phase II: Track A – Pilot Projects
 - a. Determine the framework and feasibility of utility proposed pilot projects in the 12 identified communities.

- b. Assess costs of proposed pilots, including comparison of costs for natural gas extension v. all electric or other options.
 - c. Compare monthly energy costs for current propane or wood use as compared to a natural gas extension option, all electric, or other options.
 - d. Identification of any safety issues.
- B. Phase II: Track B – Data Gathering Plan
- a. Identification of categories of costs and benefits associated with (a) the current energy condition of the identified communities resulting from lack of natural gas service, (b) extending natural gas pipelines to those communities and/or (c) other options for increasing accesses to affordable energy.
 - b. Identification of existing energy programs or tariffs already available to the identified disadvantaged communities that could increase access to affordable energy.
 - c. Identification of new alternatives to increase access to affordable energy in the identified communities.
 - d. Definition and methodology for evaluating “economic feasibility.”
 - e. How to group the identified communities with similar characteristics to facilitate the economic feasibility study for each possible energy option.
 - f. Identification of any safety issues.

4. Phase II - Community Energy Option Assessment Workshops

We also direct the parties to provide further information in 5 areas set out in Attachment B to this scoping memo. Parties are to file and serve comments in response to the questions set forth in Attachment B consistent with the schedule set forth below. The questions are divided into Track A and Track B. Information received through comments will be further vetted through Community Energy Options Assessment Workshops.

The Utilities, as stated above, are directed to provide pilot proposals for each of the 12 identified communities to the extent a community is located within its service territories. There will be an opportunity for parties to provide comments and reply comments on the pilot project proposals. Community Energy Option Assessment Workshops will be scheduled to present the proposed pilot projects.¹⁰

Workshops are expected to be held first quarter 2018. The agenda for each workshop will be developed after review of the proposed pilot projects submitted, party comments/reply comments, and responses to the additional questions set forth in the attachments to this scoping memo. The Workshops will be held in the San Joaquin Valley counties identified in AB 2672. Workshops may address the following general topics with more specific agenda items set forth in the notice for each workshop:

1. Costs and Benefits of Current Energy Condition as compared to the pilot proposals offered for each community¹¹.
2. Existing Energy Subsidies and Programs and how these can contribute to reduction in energy costs for identified communities.
3. Definition and Criteria for Evaluating Economic Feasibility and Grouping Criteria for Identified Communities.
4. Data Gathering Process and Cost Assessment.

¹⁰ To the extent additional pilot options are proposed for specific communities through party comments such proposals will also be presented during the appropriate Community Energy Options Assessment Workshop.

¹¹ To the extent a natural gas extension option is not proposed, the cost of such extension will be included in this comparison.

5. Development of the Record

The record in Phase II of this proceeding will be developed primarily through pilot project proposals, party comments, and community workshops (including workshop reports and comments). The specific dates for the workshops will be separately noticed in this proceeding. Notices of such workshops will be posted on the Commission's Daily Calendar to inform the parties to this proceeding and the public that a decision-maker or an advisor may be present at those meetings or workshops. Parties shall check the Daily Calendar regularly for those notices. Workshops will be held to discuss the issues included in the scope of this proceeding. The assigned ALJ, the assigned Commissioner, and/or her staff may attend workshops. The Utilities will prepare Workshop Summary Reports that include all workshop presentations as attachments to the Workshop Summary Reports. Parties will have an opportunity to file comments and reply comments on any Workshop Summary Reports incorporated into the record. Energy Division Staff will prepare a final workshop summary report with recommends that parties will have an opportunity to comment on as well.

6. Evidentiary Hearings (EH)

For this Phase of the proceeding, expert testimonies and hearings may be necessary relating to the proposed pilot projects, cost, data collection, and criteria for evaluating economic feasibility.

If, after submission of comments and the completion of workshops, any party contends that evidentiary hearings and/or legal briefing are needed in Phase II of this proceeding to address any issues within the Phase II scope, such party shall, no later than the dates outlined in the schedule below, file a motion

requesting evidentiary hearings and/or briefing.

The motion shall:

1. Identify each area or relevant factual inquiry that has not been addressed;
2. Identify each material contested issue of fact on which hearings should be held (explaining, as necessary, why the issue is material); and
3. State why a hearing is legally required.

These requests shall also contain requests for briefing, if any, along with an explanation of what legal issues (not position on issues of policy) the party believes are appropriate for briefing and why. If any party formally requests evidentiary hearings and/or briefing as specified here, the Presiding Officer will consider that request and inform parties of whether such hearings or briefings will be scheduled and, if so, the dates for those activities.

7. Schedule

Phase II of this proceeding is anticipated to be concluded no later than 24 months from the date of this Scoping Memorandum. A separate scoping memorandum will be issued for Phase III.

Phase II - Track A - Pilot Projects

Event	Date
Utilities to provide proposed options for pilot projects in consultation with Community groups	January 31, 2018
Party responses to questions in Attachment B to scoping memo	February 15, 2018
Party comments on Utilities proposed pilot projects and/or alternative pilot project proposals	March 2, 2018

Event	Date
Reply comments party responses to Attachment B	March 18, 2018
Reply comments on proposed pilot projects and alternative pilot proposals	April 6, 2018
Energy Option Community Workshops to be held in potential pilot communities	TBD [separately noticed]
Utilities in consultation with all parties to file summary reports of Energy Options Community Workshops	Within 10 days after each workshop date
Public Participation hearings	TBD
Status Conference	April 24, 2018
Energy Division Staff Workshop Report issued	A final workshop report covering all workshops within 45 days of last workshop.
Opening Comments on ED workshop report	14 days after workshop report issued
Reply Comments on ED staff workshop report	21 days after workshop report issued
Motion for evidentiary hearings and briefing due	Concurrent with due date for submission of comments on last workshop report
Opening Comments/Briefing on Phase II Issues	TBD [if allowed]
Reply Comments/Briefing on Phase II Issues	TBD [if allowed]
Proposed Decision authorizing pilot projects	TBD

Phase II - Track B - Data Gathering

Event	Date
Utilities to provide proposed Data Gathering Plan (that includes information set out in Attachment 2 Track B)	February 28, 2018
Party comments on Utilities proposed Data Gathering Plan	March 28, 2018
Reply comments on Utilities proposed Data Gathering Plan	April 13, 2018
Workshops, if necessary, on Data Gathering Plan to be held in Fresno	TBD [separately noticed]
Utilities in consultation with all parties to file summary of Data Gathering Plan Workshops	Within 10 days after workshop date
Public Participation hearings	TBD
Status Conference	April 24, 2018
Energy Division Staff Proposal for Data Gathering Plan	Within 45 days of last workshop.
Opening Comments on Staff Proposal	14 days after Staff Proposal issued
Reply Comments on Staff Proposal	21 days after Staff Proposal issued
Motion for evidentiary hearings and briefing due	Concurrent with due date for comments on Staff Proposal
Opening Comments/Briefing on Phase II Issues	TBD
Reply Comments/Briefing on Phase II Issues	TBD
Proposed Decision ¹²	

The proceeding will be submitted upon the filing of reply briefs or the submission of reply on the final staff workshop report for each track of Phase II,

¹² One proposed decision will be issued that includes resolution of Phase II Tracks A and B. There will not be two separate decisions.

unless the assigned Commissioner or the assigned ALJ directs further submission of evidence, argument, or comment.

The assigned Commissioner or assigned ALJ may modify this schedule as necessary to promote the efficient management and fair resolution of this proceeding.

Due to the complexity and number of workshops that will be required to properly ensure community participation in the proceeding, it is the Commission's intent to complete this proceeding within 24 months of the date this Scoping Memo is filed. This deadline may be extended by order of the Commission. (Public Utilities Code § 1701.5(b).)

Notice of workshops in this proceeding will be posted on the Commission's Daily Calendar and served on the service list for this proceeding to inform the public and all parties that a decision-maker or an advisor may be present for those meetings or workshops. Parties shall check the Daily Calendar regularly for such notices. Workshops that will be held in communities where a pilot project is proposed will be separately noticed and docketed in this proceeding.

8. Settlement and Alternative Dispute Resolution

While the schedule does not include specific dates for settlement conferences it does not preclude parties from meeting at other times provided notice is given consistent with our Rules.

The Commission offers Alternative Dispute Resolution (ADR) services consisting of mediation, facilitation, or early neutral evaluation. Use of ADR services is voluntary, confidential, and at no cost to the parties. Trained ALJs serve as neutrals. The parties are encouraged to visit the Commission's ADR webpage at <http://www.cpuc.ca.gov/adr/>, for more information.

If requested, the assigned ALJ will refer this proceeding, or a portion of it, to the Commission's ADR Coordinator. Alternatively, the parties may contact the ADR Coordinator directly at adr_program@cpuc.ca.gov. The parties will be notified as soon as a neutral has been assigned; thereafter, the neutral will contact the parties to make pertinent scheduling and process arrangements. Alternatively, and at their own expense, the parties may agree to use outside ADR services.

9. Ex Parte Rules

In a ratesetting proceeding such as Phase II of this proceeding, *ex parte* communications with the assigned Commissioner, other Commissioners, their advisors and the ALJ are only permitted as described at Public Utilities Code § 1701.3(h) and Article 8 of the Rules.¹³

9. Discovery

Discovery may be conducted by the parties consistent with Article 10 of the Commission's Rules. Any party issuing or responding to a discovery request shall serve a copy of the request or response simultaneously on all parties. Electronic service under Rule 1.10 is sufficient, except Rule 1.10(e) does not apply to the service of discovery and discovery shall not be served on the Administrative Law Judge. Deadlines for responses may be determined by the parties. Motions to compel or limit discovery shall comply with Rule 11.3.

¹³ Interested persons are advised that, to the extent that the requirements of Rule 8.1 *et seq.* deviate from Public Utilities Code sections 1701.1 and 1701.3 as amended by Senate Bill 215, effective January 1, 2017, the statutory provisions govern.

10. Intervenor Compensation

Pursuant to Public Utilities Code § 1804(a)(1), a customer who intends to seek an award of compensation must have filed and served a notice of intent to claim compensation by October 6, 2017, 30 days after the second PHC in Phase II of this proceeding which occurred on September 6, 2017.

11. Assigned Commissioner and Presiding Officer

Martha Guzman-Aceves is the assigned Commissioner and Darcie L. Houck is the Assigned Administrative Law Judge. Pursuant to Public Utilities Code § 1701.3(b) and Rule 13.2 (b), the assigned Administrative Law Judge is the Presiding Officer. The assigned Commissioner may amend the scope set out herein. The assigned Commissioner or assigned Administrative Law Judge may amend the schedule as set out herein.

12. Filing, Service, and Service List

In this proceeding, there are several different types of documents participants may prepare. Each type of document carries with it different obligations with respect to filing and service.

Parties must file certain documents as required by the Commission Rules or in response to rulings by either the assigned Commissioner or the assigned ALJ. All formally filed documents must be filed with the Commission's Docket Office and served on the service list for the proceeding. Article 1 of the Rules contains all of the Commission's filing requirements. Parties must file and serve all pleadings and serve all testimony, as set forth in Article 1 of the Commission's Rules. Parties are encouraged to file and serve electronically, whenever possible, as it speeds processing of the filings and allows them to be posted on the Commission's website. More information about electronic filing is available at <http://www.cpuc.ca.gov/puc/efiling>.

This proceeding will follow the electronic service protocols adopted by the Commission in Rule 1.10 for all documents, whether formally filed or just served. This Rule provides for electronic service of documents, in a searchable format, unless the party or state service list member did not provide an e-mail address. If no e-mail address was provided, service should be made by U.S. mail. Concurrent e-mail service to ALL persons on the service list for whom an e-mail address is available, including those listed under "Information Only," is required. Parties are expected to provide paper copies of served documents upon request.

E-mail communication about this case should include, at a minimum, the following information on the subject line of the e-mail: *R. 15-03-010*. In addition, the party sending the e-mail should briefly describe the attached communication; for example, *Comments*.

Both an electronic and a hard copy of all filed and served documents should be served on the ALJ.

The official service list for this proceeding is available on the Commission's web page. Parties should confirm that their information on the service list is correct, and serve notice of any errors on the Commission's Process Office. Prior to serving any document, each party must ensure that it is using the most up-to-date service list. The list on the Commission's website meets that definition.

13. Public Advisor and Outreach Pursuant to Public Utilities Code Section 1711(a)

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or who has questions about the electronic filing procedures should contact the Commission's Public Advisor at

(866) 849-8390 or (415) 703-2074, or (866) 836-7825 (TTY-toll free), or send an e-mail to public.advisor@cpuc.ca.gov.

Public Utilities Code § 1711(a) states:

Where feasible and appropriate, except for adjudication cases, before determining the scope of the proceeding, the commission shall seek the participation of those who are likely to be affected, including those who are likely to benefit from, and those who are potentially subject to, a decision in that proceeding. The commission shall demonstrate its efforts to comply with this section in the text of the initial scoping memo of the proceeding.

Community outreach has occurred in this proceeding through community workshops and community tours within identified disadvantaged communities in the San Joaquin Valley. Additionally, a number of the parties, including the investor owned utilities have conducted outreach to a number of communities within the counties set out in AB 2672, and through acceptance of limited public comment at the end of publicly noticed prehearing conferences held in Fresno on June 9, and September 6, 2017.

14. Subscription Service

Persons may monitor the proceeding by subscribing to receive electronic copies of documents in this proceeding that are published on the Commission's website. There is no need to be on the official service list in order to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission's website at <http://subscribecpuc.cpuc.ca.gov>.

15. Final Oral Argument

A party in a ratesetting proceeding in which a hearing is held has the right to make a Final Oral Argument before the Commission, if the argument is requested within the Closing Brief (Rule 13.13).

IT IS RULED that:

1. The scope and schedule are as set forth in the body of this ruling unless amended by a subsequent ruling of the assigned Commissioner or Administrative Law Judge.

2. Pacific Gas and Electric Company, Southern California Gas Company, and Southern California Edison Company are directed to each file and serve proposed pilot projects for communities (that are located within each utilities service territory) identified in this ruling and Attachment A to this scoping memo. Each proposal shall include the information set forth in Attachment A.

3. Parties are directed to respond to questions as presented in Attachment B to this Scoping Memo through filing and serving comments and reply comments.

4. Pacific Gas and Electric, Southern California Edison, and Southern California Gas Company shall submit Data Gathering Plans consistent with the direction provided in Attachment B to this Scoping Memo.

5. Phase II of this proceeding is categorized as ratesetting and may require hearings. This ruling as to category is appealable pursuant to Rule 7.6.

6. Hearings may be necessary but are not scheduled at this time.

7. If hearings are scheduled for this phase of the proceeding, a party shall submit request for Final Oral Argument in its opening briefs, but the right to Final Oral Argument ceases to exist if hearing is not needed.

8. Parties must serve all data requests and responses on all parties to this proceeding as set forth in Section 9 above.

9. Parties shall file and serve formal documents as set forth in Section 12 above.

10. Parties must adhere to all *ex parte* rules pertaining to this proceeding as set forth in Article 8 of the California Public Utilities Commission's Rules of Practice and Procedure.

11. Pursuant to Rule 13.2, Darcie L. Houck the assigned Administrative Law Judge is the Presiding Officer.

12. Parties shall submit all testimony or other supporting documents to supporting documents as described in Appendix A.

Dated December 6, 2017, at San Francisco, California.

/s/ MARTHA GUZMAN ACEVES

Martha Guzman Aceves
Assigned Commissioner

Attachment A

Pilot Project Content and Form Guidelines

ATTACHMENT A

Pilot Proposal Content and Form Guidelines

This document provides guidelines for the content and form of pilot proposals for submittal to the California Public Utilities Commission (“Commission”).

The purpose of the pilot projects is to test various project options to meet the goals of AB 2672, which seeks to identify disadvantaged communities in the San Joaquin Valley meeting specified requirements and to analyze economically feasible options to increase access to affordable energy in those communities. AB 2672 also requires the Commission to determine whether the options analyzed would increase access to affordable energy to those disadvantaged communities in a cost-effective manner.

Pacific Gas and Electric Company, Southern California Edison Company, and SoCal Gas Company (collectively the Utilities) are directed to provide pilot projects for the following communities identified below located in each respective investor owned utility service territory:

1. Allensworth
2. Alpaugh
3. California City
4. Cantua Creek
5. Ducor
6. Fairmead
7. Lanare
8. Le Grand
9. La Vina
10. Monterey Park Tract
11. Seville
12. West Goshen

Parties other than the three identified investor owned utilities may submit alternative pilot project proposals with the party comments on the Utilities pilot proposals. To the extent any party submits an alternative pilot project proposal; the pilot project proposal content must follow the guidelines set forth herein.

Content and Form

The following is an overview of the recommended proposal format:

Section	Suggested Page Limit
Cover Page	1
Summary	2
Rationale and Expected Outcome	5
Implementation Plan	8
Timeline and Reporting	2
Budget	2
Total Pages	20

All pages must be formatted to fit on 8.5 x 11-inch paper with margins not less than one inch on every side. Use Times New Roman typeface, a black font color, and a font size of 12 point or larger (except in figures or tables, which may be 10-point font). References must be included as footnotes or endnotes in a font size of 10 or larger. Page numbers must be included in the footer of every page.

All pilot proposals should include the following information, if applicable.

1. Cover Page

Cover page should include the name of Investor Owned Utility, the project title, the community the project will be located in, the relevant points of contact, and names of all project team member organizations.

2. Pilot Summary

It is the intention of the Commission to provide pilot summaries to the communities targeted for pilot projects. In addition to inclusion of a summary in the Pilot Proposal, please provide a version of the summary as a separate 2-page PDF for use as fact sheet in public fora (e.g., Energy Option Community Workshops). Please also provide a version of the summary in Spanish. Maps and diagrams may be included as part of the summary.

- a. Description of the project, including a specific statement of how this proposed pilot project will meet the goals set out in AB 2672.
- b. Description of the targeted community, including key demographic and geographic information (e.g., number of households impacted).
- c. Pilot rationale and expected outcome, including the economic savings and other benefits participating customers should expect.
- d. Implementation plan and timeline: include timeline for constructing any infrastructure (including rewiring of homes and purchasing replacement appliances) required for implementation of the pilot project.
- e. Budget overview: include estimates of total costs, including new funding requested, funds to be used from existing ratepayer programs, additional costs to households involved in the pilot, non-ratepayer leveraged funding, etc.

3. Pilot Rationale and Expected Outcome

- a. A specific statement of the objectives and goals of the project, including the concern, gap, or problem that the pilot seeks to address and the likelihood that the issue can be addressed cost-effectively in the proposed community through this intervention;
- b. Detailed quantitative and qualitative analysis demonstrating why this pilot was chosen for the proposed community, whether it is cost-effective and will reduce household costs for space and water heating, and why alternatives within the same category (e.g., gas or electric) are not as cost-effective or otherwise desirable for this community. If two utilities are proposing pilots in the same community (e.g., one gas utility and one electric utility), both utilities should use the same set of data and assumptions when comparing options. If utilities are unable to provide any of the analysis below, they should justify why. **Proposals should provide all assumptions, calculations and/or spreadsheets used for the quantitative analysis as attachments.**

Analysis should at a minimum include:

- 1) Pre-pilot (i.e., current) average/mean annual and monthly electric and gas bills (including usage totals and charges) for pilot communities by housing type (single family, multifamily, and mobile home). Provide separate information for households receiving electric subsidies.

- 2) Average annual propane/wood costs per household in the community. Address whether there will be any lingering propane/wood usage and cost post-pilot and if so, why.
 - 3) Modeled post-pilot annual and monthly electric and gas bills for pilot communities by housing type (single family, multifamily, and mobile home). Provide separate information households receiving electric subsidies.
 - 4) Projected household costs of pilot participation outside of the bill impact, e.g., new appliances, new wiring, weatherization, other energy efficiency interventions. What subsidies would be needed to ensure the cost for a customer in the targeted community would be less (or equal) to their current cooking, space and water heating costs in the short-term and long-term? If subsidies are needed, propose a funding source.
 - 5) Total cost of pilot project and the resulting rate impact on non-participating customers (by customer class).
- c. Specific outcomes to be achieved, at a minimum including:
- 1) Total estimated cost savings to participating households
 - 2) Number and percentage of households in the community with greater access to affordable energy
 - 3) Change in greenhouse gas/particulate intensities and indexes
 - 4) Non-energy benefits or other benefits (public health, environmental, safety, quality of life, broadband expansion)

4. Pilot Implementation Plan

- a. Summary of Scope and Approach: this section should provide a summary description of the overall work scope and approach to achieve the project objectives.
- b. Community Engagement Plan: describe relevant target community characteristics and plan to successfully engage community based on those characteristics. The proposal should also identify relevant community based organizations and engagement plans. Discussion may include but is not limited to:
 - 1) Community support and capacity for success
 - 2) Customer assessment
 - 3) Number and percentage of households/customers/units to be piloted
 - 4) Community responsibility for implementation as well as operation and maintenance of the proposed pilot.

- c. Tariffs and Existing Ratepayer Program Utilization Plan:
 - 1) What current tariffs or ratepayer-funded programs, is the utility relying on to implement pilot? If relevant, describe any barriers to utilizing current tariffs or programs.
 - 2) What if any new tariffs or ratepayer funded programs, if any, would be needed develop and implement the proposed pilot, or reduce the cost burden of pilot implementation to participants (e.g. paying for the maintenance of distribution services for any gas extension pilots)? If new tariffs are needed, clearly detail the new tariffs or programs the CPUC would need to adopt.
 - 3) Is the proposed pilot dependent on the completion of any proceedings that are current underway?
 - 4) How long would it take to adopt the identified new tariff/program(s) before the pilot can be implemented?

- d. Non-ratepayer Funding Sources and Other Program Utilization Plan:
 - 1) Resources Leveraged from external, non-ratepayer funding sources including, but not limited to: Low Income Home Energy Assistance Program, Weatherization Assistance Program, San Joaquin Valley Air Pollution Control District (Valley Air District), Eastern Kern Air Pollution Control District, County of Tulare Resource Management Agency (Climate Action Plan agency), Stanislaus County Planning and Community Development department (Climate Action Plan agency).
 - 2) Do the electrification pilots meet criteria to qualify for technology demonstration and deployment (TD&D) projects currently proposed in Electric Program Investment Charge (EPIC) 3 Investment plans (A.14-04-028)?
 - 3) Do natural gas extension pilots meet criteria to qualify for future California Energy Commission Natural Gas Research and Development projects?

- e. Siting and Safety Plan: Proposal should address compatibility of the pilot with the conditions of the surrounding environment, any safety risks, and ability to meet any appropriate environmental, health, safety, security, and public policy requirements including CEQA review.

- f. Management Plan, including, but not limited to:
 - 1) Overall approach to and organization for managing the work
 - 2) Roles of project team members

- 3) Role and management of third parties and contractors, including proposed selection criteria for contractors that considers local capabilities and employment benefits
- g. Data Gathering and Evaluation Plan: Identify target data to capture as well as information on relevant standards, or metrics or a plan to develop a standard, against which the pilot outcomes can be measured and replicated. Data gathered should be done so in accordance with the Data Gathering Plan developed in Track B of the proceeding. Plan should identify the following:
- 1) Target data to capture
 - 2) Data collection activities
 - 3) Description of estimated cost savings methodology
 - 4) Definition of success, including relevant metrics
- h. Replication Plan: Present a preliminary strategy to identify and disseminate best practices and lessons learned from the pilot to all California utilities. Questions to address include:
- 1) Which other San Joaquin Valley communities have similar characteristics to the pilot targeted community?
 - 2) Which characteristics are relevant to determine if the pilot could be effectively replicated in another community?
- i. Risk Management Plan: include a discussion of key risks/issues associated with the proposed project and associated mitigation strategies.

5. Pilot Timeline and Reporting

1. Timeline: proposals should include a timeline with major tasks, milestones, and deliverables. Also identify any major decision points where pilot administrators may request input from third parties (e.g., the Commission, community representatives) for approval to proceed. Proposals may include a project schedule in the form of a Gantt chart as well. Please note where activities are occurring concurrently.
2. Reporting:
 - a. It is expected that pilot administrators will report on progress on a quarterly basis in the form of a conference call and written report to Commission Staff and reports to parties and impacted communities. Propose a reporting plan.

- b. A final report will be required that documents all the results of the evaluation. Details for this final report will be set forth at a later date.

The following are example timelines for pilot projects¹⁴.

Table 1. Example timeline for all-electric pilots:

Stage	Time	Tasks	Deliverable/Milestone
Planning <i>(total for stage, in months)</i>	(in months from project start)	Community Outreach	
		Regulatory administrative work (filings, permitting)	
		Subcontractor procurement	
Major Decision Point (Pilot Team, Community, CPUC)			
Data Gathering & Analysis <i>(total for stage, in months)</i>		Scope and conduct building baseline analysis	
		Specify equipment for each building	
		Finalize analysis and develop monitoring plan	
Major Decision Point (Pilot Team, Community, CPUC)			
Implementation <i>(total for stage, in months)</i>		Review plans	
		Retrofitting and installation	
		System start-up	
		Monitoring and analysis	

¹⁴ Example timelines drawn from Pacific Gas and Electric Company’s (U 39 G) Case Management Conference Statement, filed September 20, 2017

Table 2. Example timeline for gas pilots

Stage	Time	Tasks	Deliverable/Milestone
Planning Design & Estimating <i>(total for stage, in months)</i>	(in months from project start)	Engineering Estimating Start Queue & Job Walk (Scoping)	
		Engineering Design Complete	
		Engineering Design Estimating	
Major Decision Point (Pilot Team, Community, CPUC)			
Project Environmental Review/Permit ting & Land Engagement <i>(total for stage, in months)</i>		Customer Engagement	
		Permitting & Environmental Release	
		Land Review	
		Develop post-implementation monitoring plan	
Major Decision Point (Pilot Team, Community, CPUC)			
Project Authorization, Pre- construction, Construction & Commissioning <i>(total for stage, in months)</i>		Job Package Complete, Route for Approval	
		Staging for Construction	
		Clearance Documentation	
		Construction Window, Testing & Commissioning, Release to Operations	

6. Pilot Budget Summary

Proposals should include a budget summary that estimates the costs associated with each stage and/or major task in the timeline. Depending on pilot characteristics, these costs may include materials, construction, equipment, administration (marketing, outreach), data collection and analysis, reporting costs, etc. For major costs, a brief paragraph explaining the breakdown may be included. All costs should be categorized and rolled up into a budget summary as below:

Table x. Budget Summary

Cost Category	Year 1	Year 2	Year 3	Total Cost	% of project
Personnel					
Travel					
Equipment					
Contractual					
Construction					
Administrative					
Supplies					
Total					

(END OF ATTACHMENT A)

Attachment B

Supplemental Information

Attachment B

Supplemental Information

Track A - Pilot Projects

1. Topic 1: Location of pilot projects.

- a. How many pilot projects should be authorized as part of Phase II of the proceeding?
- b. Should there be a set number of pilot projects in each investor owned utility's service territory?
- c. Should a pilot project be implemented in each of the 11 communities identified by the Pilot Team¹⁵?

2. Topic 2: Community Support and Capacity.

- a. What mechanisms should be included in the approval/implementation process to ensure the pilot projects to be implemented are supported by the communities that the project will be located within?
- b. What factors should be considered in determining community capacity for successful implementation of a pilot project?

3. Topic 3: Community Solar or other 3rd Party Administrator Pilot Projects.¹⁶

- a. What rules or requirements should be in place to allow for a community solar pilot project?
- b. What process should be adopted in the decision for Phase II of this proceeding to allow for community solar and other 3rd party administrator proposed projects to be considered for implementation of one or more pilot projects?
- c. What barriers exist to implementation of community solar or 3rd party administered pilot projects? To what extent can these barriers be overcome,

¹⁵ The Pilot Team refers to Self-Help Enterprises, Center for Race, Poverty, and the Environment, and the Leadership Council for Justice and Accountability.

¹⁶ Parties should review the proposed decision in R.14-07-002 issued on October 31, 2017 when addressing the questions presented in Topic 3 of this document.

and what requirements would need to be included in the decision for Phase II to address such barriers?

- d. What are the benefits to implementation of community solar and 3rd party administered pilot projects in one or more of the identified pilot communities.

Track B - Data Gathering

1. Topic 1: The Amended Joint List of Potential Disadvantaged Communities within San Joaquin Valley.

- a. Should the list of 170 identified communities jointly submitted by the IOUs on August 21, 2015 be amended to add or exclude certain communities? Explain how any recommended exclusion or addition to the list is consistent with Section 783.5.
- b. Should the 170 identified communities that are primarily served by local municipal districts be excluded from the list since those communities are not exclusively served by an IOU under Commission jurisdiction? If so, what criteria or methodology should be used to determine that a community is “primarily” served by a provider that is not an IOU subject to Section 783.5?
- c. How should the Commission take into account 170 identified communities that are partially served by natural gas? Explain the reasoning for your proposed treatment.
- d. How should the data gathered from the pilot projects described in Track A of the proceeding be incorporated into the larger data gathering effort for purposes of conducting the broader economic feasibility study?

2. Topic 2: Current Energy Conditions - Costs and Benefits of Natural Gas Pipeline Extensions, and Other Options for Increasing Access to Affordable Energy.

- a. How should the current energy conditions¹⁷ and costs in the 170 identified communities be evaluated? Does the matrix in Attachment C collect sufficient data to do so?
- b. How should the costs and benefits of natural gas pipeline extensions and other options for increasing access to affordable energy be measured?
- c. Should Gas Rules 15, 16, 20 and 21 be used for the purpose of determining the economic feasibility of extending natural gas lines beyond the proposed pilot projects? What additional factors should be used to determine the economic feasibility of extending natural gas pipelines?
- d. How should environmental factors and the state policy seeking to advance to a 100% renewable grid by 2050 be taken into account when considering whether to expand natural gas lines?

3. Topic 3: Existing Energy Programs

- a. For each of the 170 identified communities, what are current eligibility/participation rates for Commission administered programs that may make energy more affordable? How do these rates compare to each other and to the service territory as a whole?
- b. List existing programs or tariffs, or proposed new programs or tariffs for which the Commission should evaluate the economic feasibility of increased subsidies to meet the goals of AB 2672. Explain the rationale for your recommendations.

¹⁷ Current energy condition refers to the current use of propane or wood burning within the identified communities.

- c. What other agencies and programs are available to customers in the 170 identified communities to make energy more affordable?
- d. What specific barriers to participation exist for different types of affordable energy programs authorized by the Commission and administered by the investor owned utilities? Identify other non-Commission authorized programs to assist disadvantaged communities with energy costs, and any specific barriers to participation that exist. Please identify both the program and the barriers for the 170 affected communities. Please also propose solutions that would increase penetration and participation in underserved communities.

4. Topic 4: Definition and Criteria for Evaluating Economic Feasibility

- a. Should economic feasibility be evaluated by comparing proposed options to current energy conditions in the identified communities?
- b. For each proposed energy option (natural gas line extension, existing program, all electric option, community solar/electric option, and other alternative options) what factors should be used to determine “economic feasibility” for the purpose of the overall economic feasibility of providing affordable energy to the 170 identified communities? In proposing factors to be considered, parties are also asked to propose the appropriate weight to be given to each factor. Also consider desirability of using existing Commission cost tests in the Standard Practice Manual solely or in combination with other factors and methods.

- c. What non-energy benefits¹⁸ should be considered in evaluating economic feasibility, and what value should be given to such factors?

5. Topic 5: Grouping Criteria for the Identified Communities

- a. For each energy option you propose, and for the current baseline energy condition, what are the appropriate criteria to group communities with like characteristics to facilitate the economic feasibility study?

What available information and resources can the Commission use to distinguish identified communities that are disproportionately impacted by a lack of access to natural gas? Is CalEnviroScreen 3.0¹⁹ an appropriate tool for this purpose? Is the Low Income Needs Assessment (LINA) an appropriate tool for this purpose? Explain why or why not.

- b. Does the matrix found in Attachment C provide for sufficient categories of information to conduct an initial survey of residential households in disadvantaged communities to understand the differences between communities? What other household or community information would be helpful to better understand the differences between communities?

(END OF ATTACHMENT B)

¹⁸ Non-energy benefits refer to “an array of positive and negative effects of energy efficiency programs, beyond energy and associated bill savings” as defined in Skumatz Economic Research Associates’ 2010 Report “Non-Energy Benefits: Status, Findings, Next Steps, and Implications for Low Income Program Analyses in California”
<http://energyefficiencyforall.org/resources/non-energy-benefits-status-findings-next-steps-and-implications-low-income-program>

¹⁹ <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

Attachment C

Data Gathering Matrix

**Attachment C
Proposed Data Gathering Framework -
R. 15-03-010**

Data	Purpose of the data	Method to obtain data				
		Survey: Ask resident	Survey: In-person observation	Utility records	Census data ²⁰	Other
<i>Current Energy Source (including appliance type, age and location in home)</i>						
Home Heating	Cost-benefit analysis	X	X			
Water heating	Cost-benefit analysis	X	X			
Home Cooling	Cost-benefit analysis	X	X			
Cooking	Cost-benefit analysis	X	X			
Clothes drying	Cost-benefit analysis	X	X			
Insulation?			X			
Pre-screen ESA treated homes- - IOU records from ESA eligible homes HEA or check-up program participants should be tracked						
<i>Current Energy Costs (annual and seasonal)</i>						
Propane	Energy burden	X				X (Fuel providers)
Wood	Energy burden	X				X (Fuel providers)

²⁰ Census data may not be ideal, as census tract boundaries may not align well with community boundaries.

Electricity	Energy burden	X		IOU records		
Other fuel (specify)	Energy burden	X				X (Fuel providers)

Data	Purpose of the data	Method to obtain data				
		Survey: Ask resident	Survey: In-person observation	Utility records	Census data	Other
Attributes of home						
Rent/Own	Barriers analysis	X		X	X	
IOU records for ESA, SASH etc. will identify ownership						
Age of home	Barriers and cost benefit analysis	X		X		X (Online real estate records)
Type of home (e.g. MF, SF manufactured, mobile home)	Barriers analysis, Identifying suitable existing programs or	X	X	X	X	
Home internal Electrical conditions	Cost benefit analysis of electric options	X	X			
Roof characteristics (e.g. age, shading)	Barriers analysis; Cost benefit analysis of rooftop solar	X				X

Data	Purpose of the data	Method to obtain data				
		Survey: Ask resident	Survey: In-person observation	Utility records	Census data	Other
Square footage			X	X		X
Should gather info on EE program participation or other retrofit activity						
Demographics						
Household income	Energy burden	X		X	X	
Address or census block	To match survey with census data, if used		X			
Household size	Number of people in the household	X	X			X
Bill transiency / tenancy				X		
Age of tenants?						
Disabilities?						

(END OF ATTACHMENT C)

APPENDIX A

Electronic Submission and Format of Supporting Documents

The Commission's web site now allows electronic submittal of supporting documents (such as testimony and work papers).

Parties shall submit their testimony or workpapers in this proceeding through the Commission's electronic filing system.²¹ Parties must adhere to the following:

- The Instructions for Using the "Supporting Documents" Feature,
(<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=158653546>) and
- The Naming Convention for Electronic Submission of Supporting Documents
(<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=100902765>).
- The Supporting Document feature does not change or replace the Commission's Rules of Practice and Procedure. Parties must continue to adhere to all rules and guidelines in the Commission's Rules of Practice and Procedures including but not limited to rules for

²¹ These instructions are for submitting supporting documents such as testimony and work papers in formal proceedings through the Commission's electronic filing system. Parties must follow all other rules regarding serving testimony.

Any document that needs to be formally filed such as motions, briefs, comments, etc., should be submitted using Tabs 1 through 4 in the electronic filing screen.

participating in a formal proceeding, filing and serving formal documents and rules for written and oral communications with Commissioners and advisors (i.e. “*ex parte* communications”) or other matters related to a proceeding.

- The Supporting Document feature is intended to be solely for the purpose of parties submitting electronic public copies of testimony, work papers and workshop reports (unless instructed otherwise by the Administrative Law Judge), and does not replace the requirement to serve documents to other parties in a proceeding.
- Unauthorized or improper use of the Supporting Document feature will result in the removal of the submitted document by the CPUC.
- Supporting Documents should not be construed as the formal files of the proceeding. The documents submitted through the Supporting Document feature are for information only and are not part of the formal file (i.e. “record”) unless accepted into the record by the Administrative Law Judge.

All documents submitted through the “Supporting Documents” Feature shall be in PDF/A format. The reasons for requiring PDF/A format are:

- Security – PDF/A prohibits the use of programming or links to external executable files. Therefore, it does not allow malicious codes in the document.

- Retention – The Commission is required by [Resolution](#) L-204, dated September 20, 1978, to retain documents in formal proceedings for 30 years. PDF/A is an independent standard and the Commission staff anticipates that programs will remain available in 30 years to read PDF/A.
- Accessibility – PDF/A requires text behind the PDF graphics so the files can be read by devices designed for those with limited sight. PDF/A is also searchable.

Until further notice, the “Supporting Documents” do not appear on the “Docket Card”. In order to find the supporting documents that are submitted electronically, go to:

- Online documents, choose: “[E-filed Documents](#)”,
- Select “Supporting Document” as the document type, (do not choose testimony)
- Type in the proceeding number and hit search.

Please refer all technical questions regarding submitting supporting documents to:

- Kale Williams (kale.williams@cpuc.ca.gov) 415 703- 3251 and
- Ryan Cayabyab (ryan.cayabyab@cpuc.ca.gov) 415 703-5999

(END OF APPENDIX A)