STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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Ratesetting

TO PARTIES OF RECORD IN APPLICATION 14-11-007 *et al.*:

This is the proposed decision of Administrative Law Judge MacDonald. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's May 30, 2019 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4)(B).

/s/ ANNE E. SIMON
Anne E. Simon
Chief Administrative Law Judge

AES:ilz
Attachment

Decision **PROPOSED DECISION OF ALJ MACDONALD**
(Mailed 04/30/2019)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) 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
And Related Matters.	Application 14-11-009 Application 14-11-010 Application 14-11-011

DECISION ISSUING GUIDANCE TO INVESTOR-OWNED UTILITIES FOR CALIFORNIA ALTERNATE RATES FOR ENERGY/ENERGY SAVINGS ASSISTANCE PROGRAM APPLICATIONS FOR 2021-2026 AND DENYING PETITION FOR MODIFICATION

Summary

This Decision provides guidance to the four large Investor-Owned Utilities – Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and SoCal Gas Company – for their California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Program Applications for post-2020. We adopt a funding level, should funding be required, to bridge the period between authorized funding for the current 2017-2020 CARE and ESA programs and authorization of the post-2020 CARE and ESA programs. Finally, we deny the Petition for Modification filed by the Public Advocates Office.

1. Background

1.1. The Energy Savings Assistance (ESA) Program

The ESA Program was originally offered as an assistance program directly from a few Investor-Owned Utilities (IOUs) in the 1980s. In 1990, the California legislature adopted and codified the ESA program. California Public Utilities (Pub. Util.) Code Section 2790(a) provides:

> The commission shall require an electrical or gas corporation to perform home weatherization services for low-income customers, as determined by the commission under Section 739, if the commission determines that a significant need for those services exists in the corporation's service territory, taking into consideration both the cost-effectiveness of the services and the policy of reducing the hardships facing low-income households.

Currently the ESA program provides no-cost home weatherization services and energy efficiency measures to help low-income households: (1) conserve energy; (2) reduce energy costs; and (3) improve health, comfort and safety. The program also provides information and education to promote energy efficient practices in low-income communities.[1] Income eligibility for ESA participation is set at 200% or below of Federal Poverty Guidelines.

Public Utilities Code Section 382(e) set a statutory target of providing the opportunity to participate in low-income energy efficiency programs to all eligible and willing customers by 2020. To meet this target, the California Public Utilities Commission (Commission) initially identified and approved "Household Treatment Goals" in D.16-11-022 and then updated the treatment goals based on the mid-cycle Advice Letters (for years 2018 to 2020).[2]

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[1] Decision (D.) 14-11-025.

[2] Mid-Cycle Advice Letters: PG&E AL 3990-G/5329-E; SCE AL 3824-E; SDG&E AL 3250-E/2688-G; and SoCal Gas AL 5325.

The ESA Household Treatment Goals in the table below include remaining first-touches of single family, multifamily, and mobile home households.[3] The treatment goal table does not include properties treated through ESA Common Area Measures – energy efficiency measures for the common areas of income qualified multi-family residential buildings -- or retreatments.[4]

ESA Household Treatment Goal 2018-2020				
	2018	2019	2020	Total
PG&E	31,971	37,143	37,143	106,257
SCE	76,584	81,477	84,479	242,540
SDG&E	11,667	4,630	243	16,540
SoCalGas	116,592	153,659	159,780	430,031
Total	236,814	276,909	281,645	795,368

1.2. California Alternate Rates for Energy (CARE) Program

The CARE Program is a low-income energy rate assistance program instituted in 1989, providing a discount on energy rates to low-income households with incomes at or below 200% of the Federal Poverty Guideline.[5] Households that participate in certain means tested programs are also eligible for CARE. Qualified customers also consist of various individuals, including residents in non-profit group living facilities, agricultural employee housing facilities, and migrant farm worker housing centers.[6] The minimum discount, originally established at 15% in 1989, was increased to 20% in 2001.[7] Currently,

[3] First touch refers to treatment of a unit that has not participated in ESA previously.

[4] A retreatment refers to treatment of a unit that participated in ESA previously.

[5] Pub. Util. Code § 739.1(a).

[6] Pub. Util. Code § 739.2(a)(1)-(3).

[7] D.01-06-010.

electrical corporations serving 100,000 customers or more must provide a discount of 30 to 35% on average to eligible CARE Program participants, relative to the equivalent non-CARE customer bill.[8] CARE participants also receive a 20 percent discount off of natural gas charges.

The IOUs are responsible for executing strategies to cost-effectively identify, target and reach those who are CARE and ESA Program eligible. The IOUs must balance the need to serve the maximum number of eligible households with the need to verify that those enrolled in the program are eligible.[9]

2. Current Policies Impacting the 2021-2026 Low Income Program Applications

By this Decision, the Commission provides guidance to the IOUs for consideration and use in preparing the 2021-2026 Low Income Program applications.[10] The detailed Post-2020 Guidance document is attached to this Decision as Attachment A. We are authorizing a longer program period than in previous cycles to reduce administrative burdens and allow for more continuity. We ask the IOUs to present innovative design approaches in their proposed ESA programs taking into consideration the current policy landscape in which the applications will be considered.

A number of statewide policies are important to consider in developing any new ESA applications. Senate Bill (SB) 350 (DeLeon, 2015) set a statewide target to reduce greenhouse gas (GHG) emissions by 40 percent below 1990 levels and assigned the California Energy Commission (CEC) to create a plan by

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[8] Pub. Util. Code § 739.1(c)(1).

[9] D.12-08-044.

[10] D.16-11-022, as modified by D.17-12-009, provided that a decision would issue in early 2019 to provide the IOUs guidance for post 2020 ESA and CARE program applications.

2023 to achieve a statewide doubling of energy efficiency savings and demand reduction by 2030. Further, Assembly Bill (AB) 3232 (Friedman, 2018) requires the CEC in consultation with the Commission, the State Air Resources Board, and the California Independent System Operator to assess the potential, by January 2021, for the State to reduce GHG emissions, by 2030, in both the commercial and residential building stock by at least 40 percent below 1990 emissions levels associated with the supply of energy to such buildings.

The Commission also established its own environmental and social justice goals with the adoption of the Environmental and Social Justice (ESJ) Action Plan on February 21, 2019. The ESJ Action Plan defines environmental and social justice as:

> Environmental and social justice seeks to come to terms with, and remedy, a history of unfair treatment of communities, predominantly communities of people of color and/or low-income residents. These communities have been subjected to disproportionate impacts from one or more environmental hazards, socio-economic burdens, or both.[11]

As relevant here, the Commission prioritizes actions that improve local air quality, benefit public health, increase climate resiliency or provide economic benefits within ESJ communities.

We also direct the IOUs to look to low-income program models from other California agencies and other states. The Department of Community Services and Development (CSD) Low-Income Weatherization Program (LIWP) provides low-income households with solar systems and energy efficiency upgrades at no cost. The CSD LIWP successfully implemented delivery mechanisms that will be

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[11] CPUC Environmental and Social Justice Action Plan (February 21, 2019) Retrievable at docs.cpuc.ca.gov/PublishedDocs/Published/G000/M263/K673/263673090.PDF

relevant for the Multifamily Whole Building program proposals (*see* Attachment A Guidance document). Specifically, the CSD LIWP program demonstrates the feasibility in the low-income sector for 1) measures to reduce GHG emissions and energy consumption and 2) reduces participation barriers with contractor choice. We acknowledge, however, there are key differences between CSD LIWP and ESA. CSD LIWP measures reduction of GHG emissions, not energy consumption, and CSD does not employ the same cost-benefit test that is used for ESA.

The Massachusetts Low Income Affordability Network (LEAN) Multi-Family Energy Retrofit program is another model that the IOUs should consider.[12] The IOUs should also consider the relevant findings of the 2016 Low Income Needs Assessment (LINA) and the recommendations in the Low Income Oversight Board (LIOB) ESA Post-2020 White Paper and Letter dated December 20, 2018.

Finally, several Commission proceedings may impact the IOU ESA applications. The 2019 Potential and Goals Study Rulemaking (R.) 13-11-005 will forecast the technical, economic, and market-achievable energy efficiency potential for future years including specific forecasts for the low-income sector. The draft report is scheduled to issue in the second quarter (Q2) of 2019. The IOUs and other energy efficiency Program Administrators use the Potential and Goals Study (updated biennially) to develop energy efficiency portfolios. The CEC also utilizes the energy efficiency goals adopted from this study into its Integrated Energy Policy Report. The IOUs should reference any relevant

[12] *See* http://leanmultifamily.org/

information from the Potential and Goals Study in setting their ESA energy savings goals.

Additionally, AB 2672 (Perea, 2014) directed the Commission to identify disadvantaged communities in the San Joaquin Valley and required the Commission to determine economically feasible options to increases access to affordable energy. The Commission initiated the San Joaquin Valley (SJV) Pilot Programs as part of R.15-03-010.[13] The SJV pilot projects, with a budget of $56 million, allow for the replacement of propane and wood burning appliances with electric or natural gas alternatives. The SJV pilots seek to leverage the ESA program to weatherize homes. These leveraging efforts will impact the IOU applications.

Lastly, the Commission recently opened R.19-01-011 to implement SB 1477 (Stern, 2018) electrification programs, pilots for electrification and decarbonization of new construction in wildfire damaged areas, coordination with the CEC on building and appliance standards, and establish a building decarbonization policy framework. The Commission anticipates that future programs, from this proceeding, will focus in part on serving low-income households. SB1477 requires that 30 percent of the funding for its new construction electrification program will be for low-income housing. In their applications, the IOUs should consider how to partner or leverage new offerings.

3. Post-2020 Guidance

As the Commission expects the IOUs to meet the existing statutory target of providing the opportunity to participate in low-income energy efficiency programs to all eligible and willing customers by 2020, we do not anticipate that

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[13] *See* D.18-12-015 which approved the initial pilots.

the ESA Program will look the same beyond 2020. With that in mind, the IOUs should propose alternative program designs in compliance with statutory budget requirements.[14] The Commission is specifically interested in a focus on deeper energy savings and innovative program designs for the multifamily sector, including third party administration (i.e., third party program design and implementation) of a low-income multi-family whole building energy efficiency program. This is consistent with the direction of the general IOU energy efficiency program.[15] The multi-family building proposals should also address opportunities to work with building owners/managers to coordinate ESA treatment with other building improvements implemented at the time of refinancing.

The Commission ordered the IOUs to continue to use the current one (1) percent eligible population growth factor for the current ESA Program cycle and required the IOUs to propose an updated growth factor in the next application cycle for Commission consideration.[16] However, the recent release of annual projections of low-income population shows a decrease, suggesting that a growth factor is no longer applicable.[17] Moreover, we expect the IOUs to have met their household treatment targets that were set to provide all eligible and

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[14] Public Utilities Code Section 382(a) states: "Programs provided to low-income electricity customers, including, but not limited to, targeted energy-efficiency services and the California Alternate Rates for Energy program shall be funded at not less than 1996 authorized levels based on an assessment of customer need."

[15] D. 16-08-019 required third party design and implementation of 60% of the portfolios by 2020; D.18-01-004 modified this to 40% by 2020 and 60% by 2022. The definition of third party set forth in D.16-08-019 shall also apply for purposes of ESA programs.

[16] D.16-11-022, at 278-280. (*See* Ordering Paragraph 77.)

[17] Athens Research 2019 Report, in "Compliance Filing [of IOUs] Regarding Annual Estimates of CARE Eligible Customers and Related Information" dated February 8, 2019 (A.14-11-007).

willing households the opportunity to participate in the ESA Program by 2020. Instead, we direct the IOUs to identify and prioritize the eligible households that they will target in their post-2020 ESA programs, as described further in Attachment A.

The guidelines included in Attachment A to this Decision must be followed as closely as possible to allow for efficient application review and analysis. The IOUs must also include the attached Excel templates with their applications. As proposed programs for Program Year (PY) 2021 and beyond could differ from current program design significantly, IOUs may note in their applications the sections of guidance not applicable given their proposed program design and structure. The IOUs may include further relevant information as needed to describe and propose innovative approaches. Finally, the applications and requested funding levels may cover any proposed activity in the 2021-2026 time frame but could also cover a shorter time period.

4. Application Requirements, Filing Date and Low Income Oversight Board Presentation

D.16-11-022 directed the IOUs to file their post-2020 ESA program applications by June 1, 2019.[18] The assigned Administrative Law Judge (ALJ) issued a ruling extending the filing deadline to not earlier than fall 2019 so that the Commission could provide the IOUs with guidance.[19] The filing deadline for the post-2020 ESA program applications shall be September 3, 2019. In light of the fact that we are extending the deadline to provide the IOUs sufficient time to thoughtfully design and prepare the post-2020 ESA program applications, we are

[18] D.16-11-022, Finding of Fact 57 and Ordering Paragraph 151.

[19] Email Ruling issued April 4, 2019.

not inclined to grant extensions of time. Any such requests must be justified by the applicant.

D.16-11-022 further directed the IOUs to do a presentation about their applications to the Low Income Oversight Board (LIOB) prior to their submission.[20] The purpose of the presentation is to further transparency and encourage the IOUs to reach out to stakeholders and incorporate feedback prior to filing of the applications. Due to the September 3, 2019 filing deadline it may be difficult for the IOUs to present at a meeting of the full board (June and September 2019). We find it is sufficient to present to an LIOB subcommittee if it is not feasible to present to the full board. To ensure that LIOB input may be considered, the presentation shall occur on or before July 31, 2019. We continue to encourage the IOUs to reach out to stakeholders prior to filing the post-2020 applications.

We understand that the IOUs may seek guidance regarding CARE applications proposing administration of CARE programs until a Commission decision on CARE Rate Restructuring in Rulemaking 12-06-013. We direct the IOUs to submit their applications based on the current CARE rate structure and eligibility. If necessary the Commission can determine whether modifications are necessary when a decision on CARE Rate Restructuring issues.

5. Potential Bridge Funding

The current CARE/ESA funding authorization extends through the end of 2020. However, if the Commission has not issued a final decision on forthcoming applications for the post-2020 program period, this decision directs the large IOUs to continue the previously authorized ESA activities and expend

[20] *Ibid* at Findings of Fact 34.

an amount up to 2020 budget levels, as authorized in mid-cycle advice letter dispositions, on a month to month basis, beginning in January 2021, until the Commission issues a final decision for the CARE/ESA post-2020 Programs. By anticipating the potential need for funding to bridge the period between the 2017-2020 and post-2020 CARE/ESA Programs, the Commission intends to avoid uncertainty and potential program disruption, and eliminate the need for subsequent bridge funding decisions.[21]

6. Public Advocates Petition for Modification

6.1. Petition for Modification

On February 2, 2019, the Public Advocates Office (Cal Advocates) petitioned to modify D.16-11-022 to change how the IOUs conduct third-party contracting. Although Cal Advocates filed the petition over two years after D.16-11-022 was issued, Cal Advocates asserts it only became aware of the problem in the fall of 2017. Cal Advocates contends that a lack of transparency, irregularities and unwarranted delays in the procurement process resulted in higher costs to ratepayers for ESA administration, reduced competition and reduced benefits of the ESA program. Cal Advocates urge the Commission to require use of the oversight structure adopted in D.18-01-004 for energy efficiency (EE) procurements. Cal Advocates point to three elements for implementation; 1) establishment of a procurement review group (PRG); 2) utilization of an independent evaluator; and 3) a requirement that significant procurements be approved the Commission. Cal Advocates urge the Commission to consider splitting the auditor and installer roles to reduce the opportunities for fraud.

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[21] Two bridge funding decisions were required in the consolidated Application (A.) 14-11-007 *et al*.

6.2. Party Positions

The four large IOUs oppose Cal Advocates Petition for Modification (PFM) but for different reasons. PG&E asserts the petition should be denied for both substantive and procedural reasons. The substantive reasons the petition should be denied are:

1. PG&E conducted a competitive and transparent bid solicitation process, which afforded all participants an equal opportunity to compete.
2. Claims that PG&E unduly delayed the bid solicitation process are incorrect and should be denied.
3. The solicitation for bids differed significantly between 2015 and 2017 rendering them inappropriate for comparison.
4. Cal Advocates incorrectly claims that PG&E disclosed confidential communication regarding the bid solicitation process.

In addition, PG&E states the petition must also be denied because:

1. Filing the petition more than two years after D.16-11-022 violates the Rule 16.4(d) of the Commission's Rules of Practice and Procedure (hereinafter referred to as Rule(s)).
2. The petition violates Rule 16.4(d) because it fails to propose changes to the issued decision and instead seeks to impose new obligations without due process.
3. Cal Advocates failed to serve and file the requisite declaration attesting to the new facts alleged in the petition.
4. The relief requested by the petition (a new solicitation process adopted in a different proceeding) should not be granted through a petition to modify.
5. The academic article upon which Cal Advocates relies is hearsay.
6. The audit report upon which Cal Advocates relies on audited document retention requirements and not the ESA solicitation process.

7. The requested relief, to the extent granted, should apply to the next solicitation process.

The East Los Angeles Community Union, the Maravilla Foundation, the Association of California Community and Energy Services, and the Energy Efficiency Council's (TELACU) also oppose Cal Advocates petition on procedural grounds. TELACU contends the petition is untimely and the proceeding lacks any evidentiary record upon which to evaluate Cal Advocates petition. The National Resources Defense Council suggests that the Commission incorporate the petition's suggested PRG into the Guidance document in order to avoid delaying ESA implementation in the current cycle.

SCE states Cal Advocates' proposals may have merit but recommends that these proposals be made and reviewed during the IOUs' post 2020 CARE/ESA program applications. SCE contends this will allow the Commission to consider the procurement oversight proposals in an open proceeding where all parties can develop the evidentiary record. In addition, SCE states it will also allow consideration of lessons learned from the EE PRG structure established by D.18-01-014.

SDG&E and SoCal Gas (Joint Utilities) oppose Cal Advocates petition arguing that it is overbroad. The Joint Utilities assert that the PFM seeks to impose program wide changes that would impact all IOUs in the proceeding to resolve potential solicitation irregularities for a single IOU. Next, the Joint Utilities contend that the petition is premature because no solicitation has completed the newly implemented EE solicitation process. As a result, the Joint Utilities believe we cannot evaluate whether requiring a similar process would benefit the CARE/ESA program. Finally, the Joint Utilities argue that implementation of these changes at this point in the ESA program cycle would require additional time and resources.

6.3. Discussion

We deny Cal Advocates' Petition for Modification.

First, Cal Advocates' petition raises some procedural concerns including, but not limited to, whether the petition complies with applicable Rules[22] and whether the record includes sufficient reliable evidence upon which we could render a record-based decision. Cal Advocates filed their petition more than two years after D.16-11-022 was issued and towards the end of the current ESA program cycle. The Petition is based on alleged irregularities in PG&E solicitations that resulted in contracts executed in October and November 2017. Although some time was necessary for Cal Advocates to investigate and collect information, it appears that an excessive amount of time elapsed between the execution of the contracts in fall 2017 and filing of the PFM in February 2019.

We are also concerned with the lack of evidentiary record upon which to evaluate PG&E's procurement process and Cal Advocates' proposals. In addition, some of the evidence cited within Cal Advocates' petition is extra-record material. For example, "The Welfare Costs of Misaligned Incentives: Energy Inefficiency and the Principal-Agent Problem" is not in the record of this proceeding and if Cal Advocates intends to rely on the article for the conclusions reached by the article, it is hearsay.

Cal Advocates' proposals to improve procurement and contracting may benefit CARE/ESA. We agree with SCE that Cal Advocates' proposals should be made and reviewed as part of the IOUs post-2020 CARE/ESA program and

[22] Rule 16.4 (b).

budgets applications. From a timing perspective we do not anticipate significant contracting activity prior a Commission decision authorizing the post-2020 Care/ESA programs. The Commission is concerned that evaluation and implementation of Cal Advocates' proposed oversight structure at this point would negatively impact the current installation of weatherization measures and program costs.

The Guidance document highlights the procurement process established by D.18-01-004 and asks the IOUs to address the process the IOUs would utilize in contracting with third-party implementers.[23] The IOUs' applications should address potential use of the measures proposed in Cal Advocates' PFM, including but not limited to an independent evaluator, PRG, and/or Commission review of contracts exceeding a certain amount. This will provide the opportunity for the Commission and parties to fully consider the measures proposed by Cal Advocates.

7. Comments on Proposed Decision

The proposed decision of ALJ MacDonald in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on ___________, and reply comments were filed on ___________________ by ____________. Opening comments shall be limited to 10 pages and reply comments shall be limited to 5 pages.

8. Assignment of Proceeding

Clifford Rechtschaffen is the assigned Commissioner and Katherine Kwan MacDonald is the assigned ALJ in this proceeding.

Findings of Fact

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[23] *See* Guidance Document at Attachment A, Section E.2.

1. D.16-11-022, as modified by D.17-12-009, directed that a guidance decision would be issued in early 2019 to provide guidance on the priorities and issues to be addressed by the large IOUs in their post-2020 CARE/ESA program applications.

2. The ESA program provides no-cost home weatherization services and energy efficiency measures to help low-income households: (1) conserve energy; (2) reduce energy costs; and (3) improve health, comfort and safety.

3. The CARE Program is a low-income energy rate assistance program instituted in 1989, providing a discount on energy rates to low-income households with incomes at or below 200% of the Federal Poverty Guideline.

4. The IOUs are responsible for executing strategies to cost-effectively identify, target and reach those who are CARE and ESA Program eligible.

5. D.16-11-022, as modified by D.17-12-009, directed issuance of a guidance decision in early 2019 and set an application filing deadline of June 1, 2019.

6. D.16-11-022, as modified by D.17-12-009, further directed the IOUs to do a presentation about their applications to the Low Income Oversight Board (LIOB) prior to their submission.

7. On February 2, 2019, the Cal Advocates petitioned to modify D.16-11-022 to add requirements for the IOUs to implement when conducting third-party contracting.

8. Cal Advocates' Petition for Modification is based on alleged irregularities in contracts executed in October and November 2017.

9. We are concerned with the lack of evidentiary record within the proceeding upon which to evaluate PG&E's procurement process and Cal Advocates proposal.

10. The Guidance document highlights the procurement process adopted in D.18-01-004 and directs the IOUs to address the process the IOUs would utilize in the post 2020 cycle.

Conclusions of Law

1. The Commission should issue a guidance decision to provide guidance on the priorities and issues to be addressed by the large IOUs in their 2021-2026 CARE/ESA program applications to meet the requirements of D.16-11-022.

2. CARE/ESA 2021-2026 program applications should be filed by September 3, 2019.

3. IOU presentation of 2021-2026 program applications to a LIOB subcommittee should meet the D.16-11-022 requirement to present to the LIOB.

4. The Cal Advocates PFM should be denied.

O R D E R

IT IS ORDERED that:

1. The California Alternate Rates for Energy and the Energy Savings Assistance Program and Budget Applications by the large Investor-Owned Utilities Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall be filed with the California Public Utilities Commission no later than September 3, 2019. Applications must include the content and follow the format provided in the Guidance Document at Attachment A to this Decision.

2. If the Commission has not made a decision authorizing budgets for PY 2021 by December 31, 2020, the four large Investor-Owned Utilities Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall continue the previously authorized ESA activities and expend up to the 2020 budget level, as authorized in mid-cycle advice letter dispositions, on a month to month basis,

beginning in January 2021, until the California Public Utilities Commission issues a final decision on the California Alternate Rates for Energy and Energy Savings Assistance post-2020 Program Applications.

3. The Petition for Modification filed by the Public Advocates Office is denied.

4. Application 14-11-007, Application 14-11-009, Application 14-11-010, and Application 14-11-011 are closed.

This order is effective today.

Dated ___________________, at San Francisco, California.