



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

FILED

06/05/26

02:55 PM

Pacific Gas and Electric Company's (U39M) Application for Approval of 2028-2033 Income-Qualified Programs.	Application No. 26-01-003 (Filed January 9, 2026)	A2601003
CONSOLIDATED WITH		
Application of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Programs and Family Electric Rate Assistance (FERA) And Budgets for Program Years 2028-2033.	Application No. 26-01-005 (Filed January 9, 2026)	
CONSOLIDATED WITH		
Application of San Diego Gas & Electric (U902M) for Approval of Low-Income Assistance Programs and Budgets for Bridge Funding Program Years 2028-2033.	Application No. 26-01-010 (Filed February 16, 2026)	
CONSOLIDATED WITH		
Application of Southern California Gas Company (U904G) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program years 2028-2033.	Application No. 26-01-011 (Filed February 16, 2026)	

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M)
REPLY BRIEF ON DEFINITIONAL QUESTIONS**

JENNIFER C. REYES LAGUNERO
MARY KENASTON

Pacific Gas and Electric Company
Law Department, 19th Floor
300 Lakeside Drive, Suite 210
Oakland, CA 94612
Telephone: (925) 285-4904
Facsimile: (510) 898-9696
E-mail: Mary.Kenaston@pge.com

Dated: June 5, 2026

Attorneys for:
PACIFIC GAS AND ELECTRIC COMPANY

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	DISCUSSION.....	3
A.	Scoping Memo Question 7.a: <i>Legal Interpretation of “substantially the same” as used in Public Utilities Code Section 739.1(f)(1), for purposes of determining which programs can be used for categorical eligibility, including whether statute requires the income thresholds of categorical eligibility programs to perfectly align with the income threshold of the income-qualified program.</i>	3
1.	PG&E Respectfully Requests the Commission Decline the Use of The Joint Advocates’ Income Eligibility Threshold Comparison Test, The Qualifying Unit Test and NDC’s Case-by-Case Evaluation Due to Ambiguity, Add Additional Barriers to Enrollment and Administrative Burden.	4
2.	PG&E Respectfully Requests the Commission Delegate the Implementation of the Income Eligibility Threshold Comparison Test and The Qualifying Unit Test and/or Case-by-Case Evaluation to Commission Staff if the Commission Adopts These Tests	7
B.	Scoping Memo Question 7.b: <i>Definition of “income” as used in Public Utilities Code Section 739.1(a) and 739.12(a) for purposes of determining eligibility for the CARE and FERA programs.</i>	8
C.	Scoping Memo Question 7.c: <i>Definition of “household” sizes as used in Public Utilities Code Section 739.1(a) and 739.12(a) for purposes of determining eligibility for IQPs.</i>	10
1.	PG&E Respectfully Requests the Commission Reject the Joint Advocates Revised “Household” Definition as it Adds Additional Barriers to Enrollment and Administrative Burden.	10
2.	PG&E Respectfully Requests the Commission Reject Requiring a New Working Group and/or New Rulemaking to Define “Household” as it is Unnecessary.	11
III.	CONCLUSION.....	13

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

Pacific Gas and Electric Company’s (U39M) Application for Approval of 2028-2033 Income- Qualified Programs	Application No. 26-01-003 (Filed January 9, 2026)
CONSOLIDATED WITH	
Application of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Programs and Family Electric Rate Assistance (FERA) And Budgets for Program Years 2028-2033.	Application No. 26-01-005 (Filed January 9, 2026)
CONSOLIDATED WITH	
Application of San Diego Gas & Electric (U902M) for Approval of Low-Income Assistance Programs and Budgets for Bridge Funding Program Years 2028-2033	Application No. 26-01-010 (Filed February 16, 2026)
CONSOLIDATED WITH	
Application of Southern California Gas Company (U904G) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program years 2028-2033	Application No. 26-01-011 (Filed February 16, 2026)

**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 M)
REPLY BRIEF ON DEFINITIONAL QUESTIONS**

I. INTRODUCTION

Pursuant to the Assigned Commissioner’s Scoping Memo (Scoping Memo),¹ the

¹ Scoping Memo, pp. 7-8 (April 7, 2026).

Administrative Law Judge’s Ruling Modifying Schedule,² and Rule 13.12 of the Rules of Practice and Procedure (Rule) of the California Public Utilities Commission (Commission or CPUC), Pacific Gas and Electric Company (PG&E) respectfully submits this Reply Brief on Definitional Questions. The questions concern terms frequently used in the investor-owned utilities (Utilities)³ Income-Qualified Programs (IQP): California Alternate Rates for Energy (CARE), Family Electric Rates Assistance (FERA),⁴ and Energy Savings Assistance (ESA) programs.

In addition to PG&E, the following parties timely filed opening briefs: National Diversity Coalition (NDC), Public Advocates’ Office at the CPUC (Cal Advocates), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas). The Center for Accessible Technology (CforAT), National Consumer Law Center (NCLC), Sierra Club and The Utility Reform Network (TURN), (collectively, Joint Advocates) filed jointly.⁵

PG&E appreciates the parties’ respective opening briefs on this matter and acknowledges the parties’ collective dedication to California’s income-qualified communities. PG&E remains committed to serving its income-qualified communities to remove barriers to enrollment for eligible customers. In addition, PG&E also shares the Commission’s concern regarding “[c]areful stewardship of…program dollars…for all ratepayers, not just those who are enrolled.”⁶ Therefore, PG&E respectfully recommends that the Commission balance program integrity and stewardship of program dollars against any costs of increasing complexity in the implementation of any changed definitions. Considering this balance, PG&E focuses on substantive and implementation issues presented by other parties in their respective opening briefs. PG&E respectfully recommends the Commission:

- 1) Decline adopting the Joint Advocates’ Income Eligibility Threshold Comparison Test

² Administrative Law Judge’s Ruling Modifying Schedule on April 23, 2026 clarifying the date of these opening briefs to be May 15, 2026.

³ The Utilities are PG&E, San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas).

⁴ PG&E, SCE, and SDG&E only.

⁵ All references to parties’ opening briefs refer to those filed on May 15, 2026 in this proceeding, unless otherwise noted.

⁶ Tr. Vol. 1, 5:23-25, CPUC/Baker.

and The Qualifying Unit Test and NDC’s Case-by-Case Evaluation due to the ambiguity in these tests/evaluation, which could add additional barriers to enrollment and administrative burden;

- 2) Delegate the implementation of the Income Eligibility Threshold Comparison Test and The Qualifying Unit Test and/or Case-by-Case Evaluation to Commission staff if the Commission adopts these tests;
- 3) Reject adopting proposals that add complexity in determining “income” and “household” because it, in fact, adds more barriers to enrollment and administrative burdens; and
- 4) Reject establishing a new working group and/or new rulemaking proceeding to define “household” as being unnecessary because the existing working definition used by the Utilities is sufficient.

II. DISCUSSION

As a preliminary matter, PG&E agrees with SCE’s request that “any substantive changes to CARE/FERA eligibility definitions be addressed in a future IQP cycle.”⁷ For the IQP full cycle starting in 2028, PG&E developed its proposals based on the current categorical eligibility requirements. Any substantive changes to the current categorical eligibility requirements may materially affect PG&E’s proposals. Similar to SCE, PG&E would likely need to review and update its CARE/FERA testimony and requests “to reflect any major changes.”⁸ Therefore, PG&E agrees that any substantive changes based on CARE/FERA eligibility definitions should be addressed in a future IQP cycle.

A. Scoping Memo Question 7.a: *Legal Interpretation of “substantially the same” as used in Public Utilities Code Section 739.1(f)(1), for purposes of determining which programs can be used for categorical eligibility, including whether statute requires the income thresholds of categorical eligibility programs to perfectly align with the income threshold of the income-qualified program.*

PG&E agrees with the Utilities, Joint Advocates, and Cal Advocates that “substantially the same” does not mean that the income requirements must perfectly align or be exactly the

⁷ SCE Opening Brief, p. 8.

⁸ SCE Opening Brief, p. 8.

same as what is required by CARE.⁹ However the parties disagree on how Commission’s interpretation should be applied.

The Utilities are generally aligned in that “substantially the same” should be read in conjunction with California Public Utilities Code Sections 739.1(a) and 739.12(a) that set the statutory income thresholds for CARE and FERA, respectively.¹⁰ Since the programs do not need to “perfectly align”¹¹ with the CARE and FERA requirements, there is some flexibility in the various public assistance programs’ income eligibility requirements so long as they do not exceed the statutory income thresholds. The statutory income thresholds, 200 percent of FPL for CARE¹² and 200 to 250 percent of FPL for FERA¹³ are the “baseline statutory income”¹⁴ thresholds. PG&E agrees with SCE that the phrase “‘substantially the same’ should be interpreted in a way that is consistent with the statutory requirement[s]”¹⁵ The income eligibility requirements for public assistance programs should have annual household incomes that are no greater than the baseline statutory income thresholds.

On the other hand, applying the Joint Advocates’ and NDC respective recommendations may create additional barriers to enrollment and inconsistent approaches. Below, PG&E provides the substantive and implementation issues with (1) Joint Advocates’ proposed new framework, and (2) NDC’s case-by-case evaluation.

1. **PG&E Respectfully Requests the Commission Decline the Use of The Joint Advocates’ Income Eligibility Threshold Comparison Test, The Qualifying Unit Test and NDC’s Case-by-Case Evaluation Due to Ambiguity, Add Additional Barriers to Enrollment and Administrative Burden.**

PG&E respectfully requests the Commission decline using Joint Advocates’ Income Eligibility Threshold Comparison Test and The Qualifying Unit Test as well as NDC’s Case-by-

⁹ See SCE Opening Brief, p. 4; SDG&E Opening Brief, p. 7; SoCalGas Opening Brief, p. 5; Joint Advocates Opening Brief, pp. 18-19; and Cal Advocates Opening Brief, p. 2.

¹⁰ See SCE Opening Brief, p. 5.

¹¹ See SoCalGas Opening Brief, p. 5.

¹² Pub. Util. Code § 739.1(a).

¹³ Pub. Util. Code § 739.12(a).

¹⁴ SDG&E Opening Brief, p. 7.

¹⁵ SCE Opening Brief, p. 5.

Case evaluation because it adds ambiguity, additional barriers to enrollment, and administrative burden. However, if the Commission adopts these two tests and/or the case-by-case evaluation, then PG&E respectfully requests the Commission delegate application of these tests and/or evaluation to Commission staff. PG&E cautions that any new tests or evaluation to evaluate whether public assistance programs are categorically eligible should not create additional administrative burden on the Utilities.

PG&E identifies substantive issues with the framework of Joint Advocates' two tests--the Income Eligibility Threshold Comparison Test and The Qualifying Unit Test. The Joint Advocates present these tests to further evaluate public assistance programs to determine whether their income eligibility requirements are "substantially the same" as CARE/FERA and be deemed a categorical eligible program. The Income Eligibility Threshold Comparison Test poses four questions meant to evaluate whether another public assistance program's income limits are sufficiently close to CARE's 200% FPL threshold to serve to qualify as a categorical eligible program.¹⁶ The Qualifying Unit Test poses two questions meant to evaluate whether another program uses a household, family, or economic-unit (group of people who live together and share finances) structure that is substantially the same to CARE's approach for determining eligibility, even if the terminology or structure is not identical.¹⁷

The questions presented in both Income Eligibility Threshold Comparison Test and The Qualifying Unit Test are subjective and include undefined terms which are then open to additional interpretation. For example, one of the questions in the Income Eligibility Threshold Comparison Tests asks how other public assistance programs "income eligibility threshold quantitatively compares to the CARE threshold."¹⁸ The Joint Advocates recognize that public assistance programs vary in how income thresholds are assessed and in certain cases could require looking at actual dollar amounts to quantitatively compare it to CARE.¹⁹ However, the Joint Advocates do not necessarily provide a proposal of what would satisfy this part of the test in order be considered a categorically eligible program. Another question asks whether the

¹⁶ Joint Advocates Opening Brief, pp. 16-21.

¹⁷ Joint Advocates Opening Brief, pp. 21-22.

¹⁸ Joint Advocates Opening Brief, p. 17.

¹⁹ Joint Advocates Opening Brief, pp. 17-18.

program would offer “unique administrative efficiencies...”²⁰ but the Joint Advocates do not define this phrase or what would qualify as “unique administrative efficiencies.” This lack of definition would lead to additional interpretation and may add inconsistencies.

In the Qualifying Unit Test, one question asks whether the public assistance program calculates income using a “qualifying unit” that is “substantially similar” to the household income approach. The use of “substantially similar” is open to interpretation and opens the door to the same type of questions that are the subject of the current definitional questions briefing. Moreover, determining whether it is reasonable to use the public assistance program for categorical eligibility for one-person households versus CARE eligibility for larger households would cause customer confusion. Customers would struggle to understand why categorical eligibility works for some (1-person households) but not others. This is especially problematic because categorical eligibility is intended to simplify enrollment, not add nuance.

NDC proposes that for those programs with income thresholds above 200% of FPL, the Commission evaluate them on a case-by-case basis to determine if they are a categorically eligible program.²¹ The factors to consider include (1) avoiding unnecessary administrative cost and efficiency, and (2) impact of the exclusion of categorical eligibility on low-income communities.²² Like with the Joint Advocates proposed framework, there is a level of ambiguity in NDC’s proposed factors. For example, NDC states that for a public assistance program that allows an income threshold above the 200% threshold, if they are “reasonably close” to this threshold and have a large number of low-income communities enrolled, the Commission should allow this program to be categorically eligible.²³ NDC does not define what would constitute as “reasonably close” and how much is considered a “large number” in terms of the number of low-income communities. Finally, a case-by-case evaluation could lead to inconsistent policies because of the ambiguity in the factors.

The primary goal of categorical enrollment into CARE was to increase program penetration by expanding enrollment options and easing the enrollment process. Joint Advocates and NDC’s proposals to implement two tests and case-by-case evaluation, respectively, to assess

²⁰ Joint Advocates Opening Brief, p. 19.

²¹ NDC Opening Brief, p. 6.

²² NDC Opening Brief, p. 6.

²³ NDC Opening Brief, p. 6.

whether programs are categorically eligible adds complexity, potentially results in customer confusion, and would be a barrier to enrollment. Additional confusion and ambiguity will likely harm the integrity of the program because it can lead to inconsistent implementation and results. Therefore, PG&E recommends the Commission decline the Joint Advocates' Income Eligibility Threshold Comparison Test and The Qualifying Unit Test and NDC's Case-by-Case Evaluation.

2. **PG&E Respectfully Requests the Commission Delegate the Implementation of the Income Eligibility Threshold Comparison Test and The Qualifying Unit Test and/or Case-by-Case Evaluation to Commission Staff if the Commission Adopts These Tests.**

In addition to the substantive issues that the Income Eligibility Threshold Comparison Test and The Qualifying Unit Test and NDC's Case-by-Case Evaluation have to assess whether programs should be categorically eligible, PG&E also questions who would be accountable to conduct these tests. If the Joint Advocates and NDC intend the Commission to delegate application of the tests to the Utilities, then PG&E has multiple concerns.

The Utilities have previously been ordered to assess programs for categorical eligibility in Decision (D.)12-08-044 and in D.21-06-015. In both instances, the Utilities hired independent consultants, ICF International and Evergreen Economics, to conduct statewide categorical eligibility assessments/studies, which were each submitted in a Tier 2 Advice Letter (AL) for approval. In both cases, the Commission rejected the Tier 2 ALs and the recommendations from these two studies. If the Commission were to direct the Utilities to perform yet a third assessment using the Joint Advocates tests, it would add another cost to the Utilities that neither the Utilities consolidated Bridge Funding Applications nor the Full Cycle Applications account for. A Proposed Decision on the consolidated Bridge Funding Application was recently issued on May 29, 2025.²⁴ For the current Full Cycle proceeding, the Utilities would need to develop and serve a third set of supplemental testimony to request additional funding for such a study. This would delay the current consolidated proceeding and could require the Utilities to extend the bridge funding into 2028, the first year of the new cycle.

If the Commission agrees to implement the Joint Advocates' Income Eligibility

²⁴ A.25-06-022, Application of San Diego Gas & Electric Company (U 902-E) for Approval of Low-Income Assistance Programs and Budgets for Bridge Funding for Program Year 2027 and Related Matters (June 27, 2025), et al; and Proposed Decision Authorizing 2027 Bridge Funding for Investor-Owned Utilities' Income-Qualified Assistance Programs (May 29, 2026).

Threshold Comparison Test and The Qualifying Unit Test and/or NDC’s Case-by-Case Evaluation, PG&E respectfully recommends that the Commission delegate the evaluation and application to its staff. This enables the Commission staff to (1) set one consistent determination of which public assistance programs for categorical eligibility for CARE and FERA, and (2) minimize the risk of the Utilities applying different interpretations to these tests. The Utilities would then identify programs as categorically eligible based on the official guidance from the Commission and its staff.

B. Scoping Memo Question 7.b: *Definition of “income” as used in Public Utilities Code Section 739.1(a) and 739.12(a) for purposes of determining eligibility for the CARE and FERA programs.*

PG&E respectfully recommends that the Commission (1) maintain the current definition of “income” as currently defined by the Utilities and in the ESA Policy and Procedures Manual, and (2) reject Joint Advocates’ proposed Three-Prong Test.

PG&E agrees with the Utilities’ collective definition of “income” which also aligns with the Commission’s Statewide Energy Savings Assistance Program 2021-2026 Cycle Policy and Procedures Manual (v.1.4) (Manual).²⁵ PG&E corrects a statement from its Opening Brief related to income. While PG&E’s enrollment application lists housing and military subsidies as part of income,²⁶ in practice PG&E does not use housing and military subsidies as part of its income analysis because those funds are designated for housing, and not energy utility expenses. PG&E plans to revise its enrollment application to remove the reference to housing and military subsidies. This is similar to how the other Utilities define “income.”²⁷ PG&E supports the Joint Advocates’ recommendation that the Commission reaffirm that housing subsidies are not considered as part of the income requirement consistent with D.14-08-030.²⁸

The Joint Advocates argue that there is ambiguity with some categories of household

²⁵ Statewide Energy Savings Assistance Program 2021-2026 Cycle, Policy and Procedures Manual (v. 1.4), Attachment E, Table E-1, available at: <<https://www.cpuc.ca.gov/-/media/cpuc-website/consumer-support/documents/20250418-statewide-esa-program-pp-manualv14.pdf>> (accessed June 1, 2026).

²⁶ PG&E Opening Brief, p. 9.

²⁷ For example, see SDG&E Opening Brief, pp. 4-5; and SoCalGas Opening Brief, pp. 6-7.

²⁸ Joint Advocates Opening Brief, p. 22; See also D.14-08-030, p. 120, Ordering Paragraph (OP) 40 (3).

support and that the Utilities do not provide consistent instructions in their respective applications. As discussed above, PG&E does not in fact use household and military subsidies in determining whether an applicant is eligible for the program. In fact, if an applicant provides that information to PG&E, PG&E disregards it entirely. PG&E acknowledges it will need to correct the statement in its CARE/FERA application. However, PG&E is concerned that the Joint Advocates' Three-Prong Test²⁹ for defining income would increase barriers to enrollment. To implement this test would require applicants to provide additional income information and documentation. This contradicts how categorical eligibility is implemented in that customers enrolled in categorically eligible programs do not currently need to submit income documentation. Therefore, implementing this test provides a barrier to enrollment when categorical eligible programs are meant to open the door to enrollment for CARE or FERA.

However, if the Joint Advocates intend the Three-Prong Test to apply to income generally, and not just the categorical eligibility programs, then the Commission can instead refer to the ESA Manual which specifically enumerates what types of receipts are not considered household income for the purposes of determining eligibility.³⁰ Thus, PG&E generally supports Cal Advocates' recommendation that the Commission adopt the ESA program's definition of income, which is consistent with CARE's income threshold of 200% FPL and FERA program's income threshold of 200 to 250% of FPL.³¹ In addition, PG&E also generally agrees with NDC who states that the current definition of income for the purposes of determining eligibility for CARE and FERA need not be changed.³² Moreover, PG&E agrees with NDC's opposition to including non-cash benefits or subsidies as income because of the difficulty in calculating these non-cash benefits and doing so would impose additional costs and burdens.³³ Any changes in definition of income contained in the ESA Manual can be delegated to Commission staff by the Commission. PG&E understands that the ESA Program Policy and Procedure (P&P) and Installation Standards (IS) Manuals Subworking Group (PP/IS SWG) was convened to provide technical support to the ESA Working Group and may also potentially provide a forum to update

²⁹ Joint Advocates Opening Brief, pp. 24-26.

³⁰ See also SoCalGas Opening Brief, p. 7.

³¹ Cal Advocates Opening Brief, p. 3.

³² NDC Opening Brief, p. 7.

³³ NDC Opening Brief, p. 7.

the definition in the Manual if ordered by the Commission.³⁴ Therefore, PG&E supports using the current definition of “income” as what is listed in the ESA Manual.

C. Scoping Memo Question 7.c: Definition of “household” sizes as used in Public Utilities Code Section 739.1(a) and 739.12(a) for purposes of determining eligibility for IQPs.

PG&E respectfully recommends the Commission continue the existing definition of household size without any modification because doing so is beneficial to eligible customers. As a practical matter, the Utilities defer to the applicants to make the determination of who is considered as part of their household based on the guidance on the respective Utilities’ CARE/FERA applications and any other applicable rules, such as the Internal Revenue Service rules.³⁵ Adding additional layers that would require the Utilities to conduct further evaluation of an applicant’s household size determination could result in customer confusion and add additional barriers to entry into the CARE or FERA program.

1. PG&E Respectfully Requests the Commission Reject the Joint Advocates Revised “Household” Definition as it Adds Additional Barriers to Enrollment and Administrative Burden.

In its Opening Brief, PG&E recommends maintaining the current definition of “household” as defined by General Order (GO) 153-A.³⁶ The Joint Advocates states that although GO 153-A’s definition of “household” is a good working definition, it does not integrate the Federal Communication Commission’s (FCC) definition of household or economic unit as used by the FCC’s LifeLine Program as it did in the prior GO 153.^{37, 38} FCC’s LifeLine Program specifically states that an “‘economic unit’ consists of all adult individuals contributing to and sharing income and expenses of a household”.³⁹ Joint Advocates’ position regarding the definition of household is impractical for an energy utility program where energy is delivered to

³⁴ D.21-06-015, OP 66 and 69.

³⁵ See generally SCE Opening Brief, p. 7; SDG&E Opening Brief, p. 5; and SoCalGas Opening Brief, p. 8.

³⁶ PG&E Opening Brief, p. 11.

³⁷ Joint Advocates Opening Brief, p. 28.

³⁸ The LifeLine program is a federal program that offers a benefit to low-income customers for phone or internet services.

³⁹ Joint Advocates Opening Brief, p. 27.

the meter tied to the entire residence.

PG&E does not currently evaluate how income and expenses are shared within a household to determine if they are an “economic unit” and doing so would be overly burdensome. PG&E agrees with Cal Advocates position that LifeLine is not an appropriate proxy for energy programs because it is likely there is one electric and/or gas meter for one residence.⁴⁰ Whereas, with the LifeLine Program, there could be multiple phone or internet services accounts held by different people in a home who would individually be eligible for the LifeLine program if they do not share income and expenses with the other individuals in the home.⁴¹ Determining “economic units” would be impractical because the CARE and FERA discount is applied to the electric bill associated with the meter tied to the entire residence. Evaluating for “economic unit” also would cause customer confusion about what an applicant would need to provide to demonstrate that they are an economic unit that is eligible for CARE or FERA. As a practical matter, PG&E accepts the applicant’s characterization of their household at face value—PG&E does not further define relationships in a household. Using “economic unit” creates more of a barrier for customers, which defeats the desire to open up CARE/FERA eligibility to more low-income customers.

2. PG&E Respectfully Requests the Commission Reject Requiring a New Working Group and/or New Rulemaking to Define “Household” as it is Unnecessary.

PG&E respectfully disagrees with both Joint Advocates and Cal Advocates’ respective requests for a working group or new proceeding to define the term “household.” To PG&E’s knowledge, there have been no issues with the current definition of “household” that would warrant a new working group or rulemaking to reevaluate or redefine the current definition.

PG&E understands that, in the alternative, the Joint Advocates recommends that the Commission revisit the ESA Manual’s definition of household to be broader and in alignment with the Environmental Social Justice (ESJ) Action Plan, state’s housing justice and public

⁴⁰ Cal Advocates Opening Brief, p. 6.

⁴¹ See FCC Form 5631, Lifeline Program Household Worksheet, available at: https://www.usac.org/wp-content/uploads/lifeline/documents/forms/LI_Worksheet_UniversalForms-1.pdf (accessed on June 2, 2026).

health policies, and energy affordability metrics.⁴² In addition, the Joint Advocates recommend that the Commission initiate a working group to define “household” for non-categorical IQP applicants.⁴³ The Joint Advocates states that the existing definition *may* create barriers to participation.⁴⁴ In addition, the Joint Advocates state that an overly-prescriptive and inflexible definition of “household” would make program implementation more complex and creates more barriers to participation.⁴⁵

Cal Advocates states that the definition of “household size” is more appropriate for a new rulemaking proceeding, consistent with other Commission rulings with policy implications in interpreting statutory language.⁴⁶

PG&E respectfully and generally disagrees with Joint Advocates and Cal Advocates’ respective positions since the current working definition of “household” is already flexible and broad. In addition, as stated above, to PG&E’s knowledge, PG&E is unaware of any issues with the current definition of “household.” Similar to SCE, SDG&E, and SoCalGas, PG&E considers a “household” as individuals living in the residence as permanent members, regardless of familial relationship.⁴⁷ PG&E agrees that this definition is broad enough to address those categories listed in the Ruling: shared custody, multigenerational households, and military absences.⁴⁸ In addition, PG&E agrees that the ESA definition of household “provides the most guidance regarding specific household eligibility criteria.”⁴⁹ As stated above and in opening comments, PG&E’s enrollment application requests applicants to list the number of adults and children in a home. PG&E takes this information at face value and does not require the applicant to define or justify the relationships. Furthermore, applying “economic unit” to the definition of household is not necessary. Therefore, PG&E does not support establishing a new working

⁴² Joint Advocates Opening Brief, p. 31.

⁴³ Joint Advocates Opening Brief, p. 31.

⁴⁴ Joint Advocates Opening Brief, p. 32.

⁴⁵ Joint Advocates Opening Brief, p. 32.

⁴⁶ Cal Advocates Opening Brief, p. 4.

⁴⁷ SCE Opening Brief, p. 7; See also SoCalGas Opening Brief, p. 7; SDG&E Opening Brief, p. 6; PG&E considers members of a household to be those living or with an intent to be living in a residence for at least six months of the year. PG&E Opening Brief, pp. 10-11.

⁴⁸ SCE Opening Brief, p. 7; See also SDG&E Opening Brief, p. 6.

⁴⁹ SDG&E Opening Brief, p. 6.

