

Decision 18-08-019 August 23, 2018

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

DECISION APPROVING DATA GATHERING PLAN IN SAN JOAQUIN VALLEY DISADVANTAGED COMMUNITIES, ADOPTING PROCESS FOR UPDATING THE LIST OF SAN JOAQUIN VALLEY DISADVANTAGED COMMUNITIES, AND ADDING NINE COMMUNITIES TO THIS LIST

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DECISION APPROVING DATA GATHERING PLAN IN SAN JOAQUIN VALLEY DISADVANTAGED COMMUNITIES, ADOPTING PROCESS FOR UPDATING THE LIST OF SAN JOAQUIN VALLEY DISADVANTAGED COMMUNITIES, AND ADDING NINE COMMUNITIES TO THIS LIST

Summary

This decision consolidates and approves with modifications the Data Gathering Plans proposed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas). The Data Gathering Plan will gather baseline data on energy, household and community conditions within San Joaquin Valley disadvantaged communities. The conformed version of the Data Gathering Plan in Attachment A reflects the modifications adopted today. Specifically, this decision:

- Approves a competitive request for proposal process to select a single contractor, managed by PG&E;
- Directs PG&E to establish a Data Plan Working Group, to manage all Data Plan Working Group logistical and administrative functions, to co-chair the Data Plan Working Group with a ratepayer advocate and a community based non-profit, and to ensure a meaningful community voice in development of the data gathering process;
- Approves Data Gathering Plan data elements and methods, including mail and phone surveys, in-home and group interviews, and coordination with authorized Track A pilot projects;
- Approves the addition of nine communities to the list of San Joaquin Valley disadvantaged communities in this proceeding and establishes processes for future additions or removals from this list;
- Requires communities partially or primarily served by municipal utilities to be included within the Data Gathering Plan scope;

- Approves Data Gathering Plan deliverables, including a database containing aggregated and anonymized data, summary statistics, an initial summary memorandum, a workshop to discuss this, and a final, comprehensive summary report;
- Establishes a budget cap for the Data Gathering Plan and requires PG&E to submit a Tier 2 or Tier 3 Advice Letter containing a detailed Data Gathering Plan budget within 60 days of issuance of this decision. Directs PG&E to submit a Tier 3 advice letter for any budget proposal that exceeds \$3 million up to \$6 million;
- Authorizes cost recovery via Public Purpose Program charges and requires PG&E, SCE and SoCalGas to submit a Tier 2 advice letter with recommended approaches to implement these charges within 60 days of issuance of this decision.

1. Procedural Background

On September 26, 2014, Governor Edmund G. Brown, Jr. signed Assembly Bill (AB) 2672 into law and amended the California Public Utilities Code¹ to include Section 783.5, which seeks to increase affordable access to energy for disadvantaged communities (DACs) in the San Joaquin Valley and to improve the health, safety and air quality of these communities. The statute is particularly focused on assisting low-income households in disadvantaged communities that lack natural gas service and must rely on electricity, propane or wood burning to fulfill their space heating, water heating, and cooking needs. Section 783.5 defines a San Joaquin Valley disadvantaged community as meeting the following criteria: 1) At least 25 percent of the residential households with electrical service are enrolled in the California Alternate Rates for Energy (CARE) program pursuant to Section 739.1; 2) Has a population greater than 100 persons

¹ Unless otherwise indicated, all statutory references are to the Public Utilities Code.

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. Section 783.5 directs the California Public Utilities Commission (Commission) to:

- Identify disadvantaged communities in the San Joaquin Valley meeting specific income, geographic, and population requirements; and
- Open a proceeding to evaluate the economic feasibility of extending natural gas pipelines, increasing subsidies, and other options intended to improve access to affordable energy for the identified communities.

On March 26, 2015, the Commission opened Rulemaking (R.) 15-03-010 pursuant to Section 783.6. We designated the Investor-Owned Utilities (IOUs) (Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas) (collectively, the Utilities or IOUs)) as respondents.

On December 9, 2015, an Assigned Commissioner’s Scoping Memo was issued (Phase I Scoping Memo). On May 15, 2017, the Commission adopted Decision (D.) 17-05-014, which approved a methodology for identification of disadvantaged communities eligible under Section 783.5 and approved a list of 170 San Joaquin Valley disadvantaged communities (SJV DAC list) that meet the statutory criteria. D.17-05-014 requested additional information on communities that may meet the criteria to be added to the SJV DAC list but for which insufficient information was available at that time. D.17-05-014 also recommended that subsequent phases of the proceeding consider methods by which communities may be added to or removed from the SJV DAC list and

provided guidance on an economic feasibility study to be completed in phase three of this proceeding.² On June 14, 2017, the Utilities and the Leadership Counsel for Justice (Leadership Counsel) filed an “Accountability Report on Additional San Joaquin Valley Counties’ Disadvantaged Communities to Consider per D.17-05-014” that provided information on sixteen communities potentially eligible to be included in the SJV DAC list.³

On June 22, 2017, the Administrative Law Judge (ALJ) issued a ruling directing the Office of Ratepayer Advocates (ORA) to propose a framework for gathering data on the communities identified on SVJ DAC list identified in Phase I of the proceeding, which ORA filed on June 30, 2017.⁴ On August 15, 2017, the assigned ALJ issued a Ruling requesting comments on ORA’s proposed framework and related topics.⁵ PG&E, SCE, SoCalGas, ORA, the Center on Race, Poverty and the Environment (CRPE)/Self-Help Enterprises (SHE) and the Leadership Counsel, GRID Alternatives, the Greenlining Institute, Sierra Club and The Utility Reform Network (TURN)/Center for Accessible Technology

² D.17-05-014, “Decision Adopting Methodology for Identification of Communities Eligible Under Section 783.5 and Providing Guidance on Economic Feasibility Study to be Completed in Phase II,” issued May 15, 2017.

³ “Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and Leadership Counsel for Justice and Accountability’s Report on Additional San Joaquin Valley Counties’ Disadvantaged Communities to Consider per D.17-05-014,” June 14, 2017.

⁴ “Administrative Law Judge’s Ruling Confirming Parties Filing of Additional Information,” June 22, 2017.
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M191/K054/191054043.PDF>; “Response to Administrative Law Judge’s Ruling for a Proposed Data Gathering Framework and Timeline of the Office of Ratepayer Advocates,” June 30, 2017
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M192/K273/192273909.PDF>.

⁵ “Administrative Law Judge’s Ruling Confirming Parties Filing of Additional Information,” June 22, 2017.

(CforAT) filed Case Management Statements responding to the ruling on September 20, 2017. A prehearing conference was held on September 6, 2017 in Fresno and an Assigned Commissioner's Scoping Memorandum and Ruling (Phase II Scoping Memo) was issued on December 6, 2017.⁶

The Phase II Scoping Memo indicated that Phase II of this proceeding is categorized as ratesetting and will proceed on two tracks. Track A addresses authorization and implementation of pilot projects in twelve communities identified in the Phase II Scoping Memo that are a subset of those on the SJV DAC list adopted in D.17-05-014. Track A will be the subject of a future decision. Track B, the subject of today's decision, addresses data gathering needs in the SJV DACs. Subsequently, Phase III of this proceeding will evaluate progress with implementation of any authorized pilot projects and review the data collected pursuant to the approved Data Gathering Plan (Plan). Phase III will also utilize data collected from the Plan and any authorized pilot projects to conduct the economic feasibility study required by AB 2672.

The Phase II Scoping Memo identified the following communities as potential hosts to pilot projects to be considered in Track A: Allensworth, Allpaugh, Cantua Creek, Ducor, Fairmead, Lanare, Le Grand, La Vina, Monterey Park Tract, Seville, California City, and West Goshen. It also outlined general objectives for pilot projects under Track A, directed the Utilities to file pilot project proposals and authorized non-utility parties to file pilot project proposals when commenting on Utility proposals. PG&E, SCE and SoCalGas filed Track A pilot project proposals on January 31, 2018. On March 2, 2018, TURN, ORA,

⁶ "Assigned Commissioner's Scoping Memorandum and Ruling," December 6, 2017. <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M199/K979/199979978.PDF>.

CforAT, the Sierra Club and Natural Resources Defense Council (Sierra Club/NRDC), GRID Alternatives and SoCalGas commented on the Utilities' pilot proposals. The CRPE, SHE and the Leadership Counsel commented collectively, calling themselves the "Pilot Team." A non-Utility party, GRID Alternatives, along with Proteus and Tesla, filed their own pilot project proposal concurrent with their comments on March 2, 2018. Greenlining Institute, TURN, Sierra Club/NRDC, ORA, GRID Alternatives, SoCalGas, PG&E, the Pilot Team, and the California Solar and Storage Association (CSSA) filed reply comments on the Utilities' pilot project proposals on April 6, 2018. The Commission has not yet authorized any Track A pilot projects.

The Phase II Scoping Memo indicated that Track B of this proceeding would finalize a plan to gather information necessary to evaluate economically feasible energy options for the communities listed on the SJV DAC list. It proposed a Data Gathering Framework based on previous party input to ORA's Data Gathering Framework, requested parties to comment on additional questions in an Attachment B, and directed the Utilities to file data gathering plans. On February 28, 2018 PG&E, SCE and SCG filed proposed plans. On March 28, 2018 TURN, GRID Alternatives, ORA, Sierra Club/NRDC, the Pilot Team, Greenlining Institute, CforAT and PG&E commented on the Utilities' proposed Plans. On April 13, 2018, PG&E and ORA provided reply comments on the proposed Plans.

On February 15, 2018, TURN/CforAT, ORA, GRID Alternatives, PG&E, Sierra Club/NRDC, the Greenlining Institute, the City of Fresno, the Pilot Team, SoCalGas, and SCE commented on the Phase II Scoping Memo Attachment B questions. On March 19, 2018, PG&E, SCE, SoCalGas, GRID Alternatives, TURN, ORA, the Pilot Team, and the Greenlining Institute filed reply comments on the

Phase II Scoping Memo Attachment B questions. A case management conference was held on April 28, 2018.

2. Issues Before the Commission

The Phase II Scoping Memo states that,

the [Phase III] 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 Plan addressed in this Phase II of the proceeding will need to include all information necessary to address each of these considerations.⁷

The Phase II Scoping Memo also states that the Plan should involve “identification of existing energy programs or tariffs already available to the identified disadvantaged communities that could increase access to affordable energy.”⁸

The following issues identified in the Phase II Scoping Memo will be addressed in this decision:

- Data gathering to support a Phase III economic feasibility analysis
- Creating a baseline of current energy conditions
- Approaches to grouping communities with similar characteristics
- Adding or excluding communities from the SJV DAC list approved in D.17-05-014
- Consideration of communities partially or primarily served by municipal utility districts

⁷ Phase II Scoping Memo at 7.

⁸ “Assigned Commissioner’s Scoping Memorandum and Ruling,” December 6, 2017 at 7.

- Coordination of data gathered as part of Track A pilot projects with that gathered as part of larger the data gathering effort

In addition, this decision addresses issues raised by the Utilities' proposed plans and party comments in the following areas:

- Contracting
- Coordination with communities and parties
- Data elements
- Data collection methods
- Data confidentiality
- Plan phasing
- Plan timeline
- Plan deliverables
- Plan budget cap
- Cost recovery

In the following sections we review and discuss the Utility proposals and party comments and set forth the framework and requirements of the Plan authorized by this decision.

3. Jurisdiction

Section 783.5 directs the Commission to identify disadvantaged communities in the San Joaquin Valley meeting specific income, geographic, and population requirements and open a proceeding to evaluate the economic feasibility of extending natural gas pipelines, increasing subsidies, and other options intended to improve access to affordable energy for the identified communities. The primary purpose of the Plan is to collect the information needed to establish baseline conditions in the identified communities and to

support an analysis of the economic feasibility of extending affordable energy options to these communities, that lack access to natural gas.

4. Review and Discussion of Data Gathering Plan Components

The Utilities' proposed plans all propose consolidating the plans into one plan and all provided identical timelines.⁹ In other areas, the Utilities' proposals differed in their specific approaches and level of detail. A primary difference in the plans lay in conceptions of how to coordinate data gathering undertaken pursuant to an approved plan with implementation of any pilot projects authorized pursuant to Track A of this proceeding. SCE envisioned that data collection related to any pilot projects would be funded and conducted under the auspices of a single Plan that includes the broader data gathering plan. Whereas PG&E described a data collection plan that is highly related and coordinated with data collection on the authorized pilot projects, but funded and possibly implemented separately. We discuss the pros and cons of each approach in more detail below.

4.1. Selection of Contractor and Coordination with Communities

The Utilities support retaining a single consultant to implement a single, plan, as this would ensure that a single approach is implemented consistently across all SJV DAC listed communities. The Utilities propose hiring a consultant through a competitive request for proposals (RFP) that will draft the data

⁹ "Southern California Gas Company (U 904) Proposed Data Gathering Plan," February 28, 2018; Pacific Gas and Electric Company's (U 39 G) Proposed Data Gathering Plan, February 2, 2018; "Southern California Edison Company's (U 338-E) Proposed Data Gathering Plan," February 28, 2018.

gathering survey instrument, administer the survey, and process/summarize the data. The hired consultant will be managed by the Utilities, with Commission oversight.. SoCalGas and PG&E propose that one utility be chosen as the Responsible Party to perform the contracting and consultant oversight. They also propose that the selected contractor coordinate with local stakeholders and appropriate community representatives to incorporate community feedback. SCE concurs with this approach. Both PG&E and SoCalGas offer to be the Responsible Party. PG&E notes that 131 of the 170 SJV DAC list communities lie within its service territory. SoCalGas recommends a co-funding agreement between the Utilities. It further recommends that a working group be established to provide advisory input to the contractor. The draft RFP, the Statement of Work (SOW), reporting requirements, and draft reports prepared by the contractor will be reviewed by the working group prior to their release. SoCalGas urges deferring final selection of data collection methods until after a contractor has been selected.¹⁰

All parties agree with the Utilities proposal of implementing a single plan and contracting with a single vendor to conduct the data gathering. Some parties caveat their support on the need for active and culturally appropriate community engagement. The Pilot Team and GRID Alternatives emphasize that the contractor must work closely with the Pilot Team, community-based organizations (CBOs) and community liaisons to establish trust. Greenlining Institute and the Pilot Team suggest bidders must be based in the San Joaquin Valley or demonstrate experience working with San Joaquin Valley communities.

¹⁰ "SoCalGas's Proposed Data Gathering Plan," February 28, 2018.

These parties indicate that local CBOs or community liaisons could assist with verifying bidders' with experience working in the valley. GRID Alternatives recommends the Commission appoint a CBO to lead the study and Greenlining Institute suggests that Energy Division determine the winning bidder. Citing the California Energy Commission's recent Low-Income Barriers Study, the Pilot Team underscores the low levels of trust that exist between low-income minority communities and large institutions such as government agencies and energy utilities.¹¹

The Pilot Team and Greenlining Institute agree with SoCalGas' proposal that the Commission designate a working group to review elements of any draft RFP or Statement of Work. The working group must include an "adequate and meaningful community voice." The Pilot Team insists that the Plan contractor must work with them, other CBOs and/or community resident liaisons throughout the course of the study, not simply at its initial stages. GRID Alternatives suggests that the Commission direct the Utilities to consult with residents, CBOs and community liaisons in the design of data gathering materials. GRID Alternatives, CforAT, Greenlining Institute and ORA emphasize the need to collect data in the primary language of the community, and a culturally appropriate manner.¹² GRID Alternatives also emphasized data

¹¹ "Pilot Team Comments on Proposed Data Gathering Plans," March 28, 2018 at 1. *See also* "Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities," Energy Commission, December, 2016. http://www.energy.ca.gov/sb350/barriers_report/.

¹² "GRID Alternative's Comments on Investor-Owned Utility Data Gathering Plans as Directed by the Assigned Commissioner's December 6, 2017 Scoping Memorandum and Ruling," March 28, 2018 at 3-4.

collection by third party and other pilot project implementers whenever feasible to avoid duplication and confusion to residents. The “pilot project implementers” are the entities that will be chosen to implement the approved project pilots. Until the pilot projects are approved, we do not know if the implementers will be utilities or third parties. CforAT suggests that bidders be required to describe how data will be collected from communities that speak a primary language other than English, people with disabilities, households that include undocumented members and those that may be reluctant to provide information.¹³

4.1.1. Discussion

All of the proposals and comments point to the need for a single qualified entity to conduct the Plan in a thoughtful, culturally appropriate manner that engages and is responsive to community residents, CBOs and parties. We are sympathetic to concerns that a RFP process led by the Utilities may not result in these conditions. Therefore, Commission staff, while not managing the contract, will closely oversee the RFP process. We have considered but decline to direct the Utilities to contract with a particular CBO or party. This will be a data gathering effort of considerable scope with a very rapid timeline that requires expertise and familiarity with the specific energy related data. We agree with PG&E that as the utility with the majority of identified DACs within its service territory it is the appropriate entity to serve as the Responsible Party in the contracting process. We direct PG&E to work with SCE and SoCalGas to put in place co-funding agreements to address cost sharing for data collection among

¹³ “Comments of the Center for Accessible Technology to PG&E, SCE, and SoCalGas’s Proposed Data Gathering Plans for Phase II, Track B,” March 28, 2018 at 3.

the utilities. PG&E shall manage development of the RFP, with input from a Data Plan Working Group (Working Group) as described below.

PG&E shall establish and manage a Working Group, which shall operate in an advisory capacity. PG&E, a ratepayer advocate and a CBO will co-chair the Working Group. Both ORA and Self-Help Enterprises (SHE) have offered to serve as co-chairs for the Working Group. We adopt a three co-chair approach in order to leverage the valuable expertise and perspective provided by both of these organizations. The three co-chairs shall work with parties to determine the make-up of the Working Group such that it appropriately includes meaningful participation by community leaders and/or CBOs from the identified communities. Parties to this proceeding, CBOs and community liaisons have valuable knowledge of the conditions and barriers faced by San Joaquin Valley DACs that will be necessary to appropriately design and field the Plan. SCE and SoCalGas shall actively collaborate with PG&E to support the RFP and Working Group processes. Energy Division staff may participate in the Working Group meetings but PG&E shall manage all meeting logistics and administrative tasks and engage a group facilitator, if deemed necessary. In addition, PG&E is authorized to provide financial support to SHE for its role as a community liaison between the Working Group and the SJV DACs and for SHE's time and expenses related to its co-chair role with the Working Group, as determined reasonable and appropriate and within the allocated budget authorized by this decision.

We agree that winning bidders for the Plan be required to demonstrate substantial knowledge and experience in the San Joaquin Valley, and direct PG&E to ensure this in their RFP scope. Bidders may demonstrate this experience by including individuals or CBOs on their teams that have experience

working in the San Joaquin Valley. In addition, parties hold a wealth of expertise on the San Joaquin Valley that Utility staff may lack. PG&E shall solicit input on the scope of work for the RFP from Working Group members, parties and others in a publicly noticed meeting. At minimum, the RFP must require successful bidders to: (1) demonstrate substantial knowledge of, with a preference for actual experience in, the San Joaquin Valley; (2) describe how they will implement the Plan in a language and culturally appropriate manner; and (3) describe how they will reach hard-to-reach customers, including those with disabilities and those reluctant to provide information. These are exactly the types of residents of DACs that may currently lack access to natural gas and that this proceeding is intended to benefit. It is also reasonable for Commission staff to oversee PG&E's RFP process. We direct PG&E to provide a draft RFP and scope of work to Energy Division staff for review and approval.

PG&E shall ensure that the winning bidder consults with residents, CBOs and community liaisons in the design of data gathering materials and approaches and undertakes robust, continuous community outreach. PG&E shall also ensure that the winning bidder works closely with parties, CBOs and community liaisons to establish trust within the identified communities, as this will be critical to the success of the data gathering effort. We encourage the Working Group to submit periodic reports to Energy Division staff on the work of the Plan contractor; in addition, individual Working Group members may provide recommendations to the Plan contractor to improve performance, as warranted. As noted above, the Commission has not authorized any Track A pilot projects or pilot project implementers for the twelve possible host communities. These will be considered in a subsequent decision. To avoid

confusion, PG&E shall at that time integrate implementers of authorized Track A pilot projects into the data collection process to the extent feasible.

The Plan contractor shall also develop a Work Plan that further defines Plan methodologies and timelines. We discuss this in more detail below.

4.2. Data Plan Elements

The Utilities' proposed plans expand upon the Data Gathering Framework proposed in the Assigned Commissioner's December 2017 Scoping Memo. For ease of reference, we provide the data elements proposed in the Data Gathering Framework in Table 1 below.

Table 1: Data Elements in Data Gathering Framework (Phase II Scoping Memo)

Current Energy Source	Current Energy Costs
<ul style="list-style-type: none"> - Home heating - Water heating - Home cooling - Cooking - Clothes drying - Insulation 	<ul style="list-style-type: none"> - Propane - Wood - Electricity - Other fuel type (specify)
Attributes of Home	Demographics
<ul style="list-style-type: none"> - Rent/own - Age of home - Type of home - Home internal characteristics - Roof characteristics - Square footage 	<ul style="list-style-type: none"> - Household income - Address or census block - Household size - Bill transiency/tenancy - Age of tenants - Disabilities

SCE and SoCalGas suggest that data elements be finalized as part of planning discussions with the selected Plan contractor.¹⁴ SoCalGas and PG&E also propose specific additional data elements as summarized in Table 2 below:

¹⁴ "SCE's Proposed Data Gathering Plan," February 28, 2018 at A-2.

Table 2: New Data Elements Proposed by Utilities' Data Gathering Plans¹⁵

Household Data	Demographic Data
<ul style="list-style-type: none"> - Address - Landlord contact info, if rented - Construction type - Build date - Square footage - Bedrooms - Bathrooms - Number of occupants - ESA remediated date - ESA program measures installed - ESA program measures not installed - Thermostat type - Has attic insulation - Space heater type - Cooler type - Propane pipe condition - Propane line underground - Electrical panel size/ condition - Electric wiring type - Electric wiring condition - Electric code issues - Plumbing system conditions - Asbestos (present or likely present?) - General housing code issues that may be triggered by fuel switching - Condition of housing envelop 	<ul style="list-style-type: none"> - On all electric rate - On CARE rate - On FERA rate - On Medical Baseline rate - Qualified for Medical Baseline rate - Number of occupants - Number of occupants aged 65 or older - Email address - Internet access at home - Internet access on mobile - Uses Facebook - Uses Twitter - Uses Nextdoor
Pilot and Program Awareness	Energy Awareness
<ul style="list-style-type: none"> - Awareness of the San Joaquin Valley Proceeding (R.15-03-010) - Awareness or participation in low income programs - Perceived burden of energy costs - Perceived reliability of energy source - Awareness of community based organizations (CBOs) 	<ul style="list-style-type: none"> - Effective energy saving practices - Real and perceived challenges with paying energy bills

¹⁵ "SoCalGas's Proposed Data Gathering Plan," February 28, 2018; "PG&E's Proposed Data Gathering Plan," February 28, 2018.

Non-utility parties concur with a number of PG&E and SoCalGas's suggestions. Sierra Club/NRDC emphasize questions on customers' awareness of utility programs (rates, rebates) and why they have or have not taken advantage of such programs.¹⁶ The Pilot Team suggests that detailed technical data on baseline conditions be gathered, similar to those suggested by SoCalGas.¹⁷

Non-utility parties also propose a number of new data elements. We consolidate the proposals of GRID Alternatives, Greenlining Institute, the Pilot Team, ORA, TURN and the Sierra Club/NRDC in Table 3 below:

Table 3: Additional Data Elements Proposed by Parties

Resiliency and Quality of Energy Services	Additional Non-Energy Benefits:
<ul style="list-style-type: none"> - Number of times per year resident lacks access to wood or propane - Duration of lack of access to wood or propane - Outages per year - Duration of outages - Overall customer satisfaction - Broadband service¹⁸ 	<ul style="list-style-type: none"> - Safety to the community and homes - Health, comfort and quality of life benefits - Workforce development and career enhancement - Criteria air pollutants reduced - GHGs reduced - Public health, both inside the residence and in the community
Community Issues	Cost data
<ul style="list-style-type: none"> - Community capacity and interest (ex. experience with community outreach related to energy solutions, effective outreach methods). - Community preference for an energy solution 	<ul style="list-style-type: none"> - Equipment and installation costs (to refine utility estimates)

¹⁶ "Sierra Club and Natural Resources Defense Council Comments on Utilities' Data Gathering Plans," March 28, 2018 at 4.

¹⁷ "Pilot Team Comments on Proposed Data Gathering Plans," March 28, 2018 at 7.

¹⁸ "The Greenlining Institute Comments on Utility Data Gathering Plans as Directed by the Assigned Commissioner's December 6, 2017 Scoping Memorandum and Ruling," March 28, 2018.

Additional Household Data	Customer Experience
<ul style="list-style-type: none"> - Customers' current usage levels for each household energy source (propane, wood, electricity and other fuel, to support estimating the share of local pollution generated by household sources) - Estimates of customers eligible but not participating in existing low-income programs, and interest in enrolling in low-income programs 	<ul style="list-style-type: none"> - Customer preferences for energy solution - Customer energy needs and perceived energy or air quality challenges (such as difficulty affording energy costs and in-home temperature comfort and air quality)

4.2.1. Discussion

There is significant overlap between the data elements proposed by the Utilities and those proposed by non-utility parties. In considering these proposals, it is important to revisit the goals of the Plan and the related economic feasibility assessment as outlined in D.17-05-014 and the Phase II Scoping Memo.

The primary purpose of the Plan is to collect the information needed to establish baseline conditions in the identified communities and to support an analysis of the economic feasibility of extending affordable energy options to these communities, in particular to dwellings that currently lack access to natural gas. The Phase II Scoping Memo indicated that economic feasibility would be assessed by a number of considerations, including the costs of gas distribution pipeline extensions, rewiring for electricity and comparing conversion to all-electric service with the extension of natural gas. The Phase II Scoping Memo also indicated that issues of public health and enhancing public safety would be considered.¹⁹ D.17-05-014 earlier stated that the economic feasibility of options considered in this proceeding would, at minimum, be based on:

¹⁹ "Assigned Commissioner's Scoping Memorandum and Ruling," December 6, 2017.

- Direct financial and energy specific costs and benefits of the individual program, including the implementation costs of the program to utilities, ratepayers, and the participating households. Quantifiable benefits including lowered energy costs and increased energy efficiency.
- Direct health, comfort, and safety impacts of the option on participating households.
- Indirect costs and benefits to society and the environment, including improved air quality in the community, reduced greenhouse gas (GHG), and increased diversity in energy sources.²⁰

Neither the proposed Data Gathering Framework nor the additional data categories proposed by the Utilities sufficiently address the full scope of the data needs envisioned for the economic feasibility analysis.

Therefore, it is reasonable that additional data elements should be added to the Utilities' consolidated plan proposal. With the exception of the availability of broadband, proposed by Greenlining Institute, all of the proposed additional data elements focus on information necessary to establish baseline conditions or communicate with residents about the Plan or subsequent proceeding activities. With the exception of broadband availability, the additional data elements proposed by the Utilities and by parties are reasonable and are approved.

Regarding broadband availability, we agree with Greenlining that information on broadband availability in the SJV DACs could prove useful when we consider affordable energy options in Phase III of this proceeding. The Commission maintains the California Interactive Broadband Map,²¹ an

²⁰ D.17-05-014 at 35.

²¹ <http://www.broadbandmap.ca.gov/>.

interactive map on broadband availability at the census block level. Using this, Commission Communications Division staff will prepare summary information on broadband availability in the SJV DACS that may be appended to the contractor's final report.

In addition, we believe it could be prudent if the Plan effort record easily-available information on pending under-ground infrastructure improvements in the communities, such as for waste water treatment. Having such information could support the identification of opportunities for coordinated installation of below-ground infrastructure, including pipelines and broadband, potentially reducing installation costs for future energy options. We direct PG&E and the Plan contractor to discuss this topic with the Data Plan Working Group and seek to identify if there are any priority communities on the SJV DAC list for which collection of such information at this stage would be important. If agreed to be so, the Plan contractor shall collect high-level community data on pending under-ground infrastructure improvements, within reasonable cost limits, by such means as contacting local county offices, the State Water Resources Control Board or other approaches as deemed reasonable and that do not increase the cost for completing the Plan. With these additions, the data categories and fields proposed by the Utilities and by parties are reasonable and are approved.

The Utilities and the Working Group may subsequently determine that it is necessary to modify or eliminate some of these data elements per recommendation of the selected consultant prior to Plan implementation. PG&E shall also ensure that early Working Group sessions review the level of technical detail required for the data elements approved herein.

4.3. Data Collection Methods

SCE and SoCalGas emphasize controlling Plan costs and propose to defer finalization of data collection methods until after a Plan contractor has been selected via competitive RFP.²² We agree that prescribing excessive detail on data collection methods in this decision could be counterproductive and could restrict the ability of the Plan contractor to best develop specific Plan methods as informed by its expertise and input from the Working Group. To avoid this, the following section approves general principles that PG&E and the Plan contractor, in consultation with the Working Group, will include in a more detailed discussion in the contractor's Work Plan (*see* Section 4.7).

4.3.1. Surveys and In-Home Visits

The Data Gathering Framework included in the Phase II Scoping Memo lists a wide range of data collection methods, including surveys and in-person visits. PG&E recommends primarily using surveys to gather these data directly from community residents. The Utilities oppose undertaking a “complete census” of all dwellings in the SJV DAC list communities, as this would significantly increase labor costs. Instead, they recommend a strategy of web or direct mail surveys, with follow-up reminders by phone, email, or postcard. PG&E states that information that cannot be obtained from surveys may require follow-up in-person visits, but these should be limited in number. PG&E proposes additional stakeholder talks to agree on the level of technical detail needed and whether this can be obtained directly through web and direct mail

²² “SoCalGas’s Proposed Data Gathering Plan,” February 28, 2018.

surveys. SCE states that households should be screened and invited to participate based on criteria developed at a later point by the Utilities.²³

Sierra Club/NRDC agree that phone and mail surveys are less expensive but note that in-home visits will likely be needed for certain data, for instance about the conditions of home electrical wiring or voltage level. They recommend that the Plan contractor propose the number of household visits needed to gather statistically significant information.²⁴ Greenlining Institute suggests that the Utilities also include in-person meetings in their data gathering approaches.²⁵ The Pilot Team stresses that community support and buy-in will drive the accuracy of data collection efforts.²⁶ TURN proposes that survey work should raise households' awareness of existing low-income programs and allow for enrolling interested customers.²⁷

4.3.1.1. Discussion

Many residents of the identified communities are unlikely to have internet access and may be reluctant to participate in phone surveys if they have not been provided with context and reassurance by community liaisons or CBOs that are familiar to them. Thus, data gathering approaches common to studies of this type – internet and phone surveys – may be insufficient to generate sufficient responses for statistically significant results, when including subgroupings.

²³ “SCE’s Proposed Data Gathering Plan,” February 28, 2018 at A-2.

²⁴ “Sierra Club and Natural Resources Defense Council Comments on Utilities’ Data Gathering Plans,” March 28, 2018 at 3.

²⁵ “The Greenlining Institute Comments on Utility Data Gathering Plans,” March 28, 2018 at 2.

²⁶ “Pilot Team Responses to Attachment B to Scoping Memorandum and Ruling,” February 25, 2018 at 7.

²⁷ TURN, Comments on Data Gathering Plans at 8.

In-home visits will undoubtedly be required for a number of data elements, such as the condition of electric wiring or voltage.

With this in mind, phone and internet surveys, and paper surveys, should be utilized where feasible. Where these methods do not yield sufficient response, in-house or group interviews should be employed. These should be planned with and involve community liaisons and CBOs working with the study. PG&E shall work to minimize data collection costs while ensuring the usefulness and validity of results. We agree with TURN that surveys and interviews with residents should take advantage of the opportunity to raise awareness about existing low-income programs and enroll interested customers. PG&E and the Plan contractor shall provide for this in their survey and interview instruments and activities.

Finally, as we have provided for the Utilities to recover their costs for developing, administering and reporting on the Plan, we wish to ensure that residents of the San Joaquin Valley are financially supported, as appropriate, to participate in Plan surveys, interviews, and meetings, through the use of survey incentives, travel stipends, per diems and the like. Community liaisons assisting communities with participating in the Plan should also be financially supported, as appropriate, for this work. We direct PG&E to develop participation incentives, travel stipends, per diems and other means to financially support SJV residents and community liaisons for participating in the Plan, as determined appropriate. The incentives are to be included with the overall proposed budget and included within the budget cap provided for in this decision. PG&E shall consult with the Data Plan Working Group to develop and refine these financial support methods as needed.

4.3.2. Approach to Grouping Communities

PG&E proposes to group communities to develop sampling plans and generalizable insights when it is reasonable to do so, first according to their access to natural gas infrastructure and secondly according to population size. PG&E argues that this would divide communities into two distinct groups with fundamentally different baseline energy conditions and potential solutions. PG&E recommends that communities with 90 percent gas service or higher be defined as having “high” rates of gas access and those with less than that be defined as having “low” rates of access. These “low” access communities should be studied in greater detail, according to PG&E, including through survey approaches that exceed typical sampling approaches and aim at obtaining maximum response rates. Further, PG&E proposes, those with “high” access to natural gas should be divided by population size, specifically into “small” DACs (with 1,000 households or fewer), “medium” DACs (1,001 to 10,000 households) and “large” DACs (10,001 households or more).²⁸ SCE proposes that data gathered through pilot projects – such as household and home related barriers and conditions to participation – be used to refine initial grouping criteria. This would support the future expansion of pilot approaches in other communities or in different types of homes or customers, according to SCE.²⁹

ORA supports PG&E’s grouping approach but notes that the sampling method and sample size should allow for valid statistical analysis of key subgroups, such as customers grouped by current home energy sources, type of home, household income level, household size and tenancy or ownership

²⁸ PG&E’s Proposed Data Gathering Plan, February 2, 2018 at 6.

²⁹ “SCE’s Proposed Data Gathering Plan,” February 28, 2018 at A-3.

status.³⁰ Sierra Club/NRDC emphasize the need for well-defined subgroups and propose that the Plan contractor be required to propose and justify a sampling method to be used across eligible communities to ensure statistically significant information without requiring survey responses from all households.³¹ The Pilot Team supports PG&E's suggested initial grouping criteria but stresses that this should be supplemented by on-the-ground data collected from pilot projects to generate more specific criteria that will allow for the most accurate groupings, similar to SCE's proposal.³² GRID Alternatives provides an extensive list of criteria for possible sub-groupings. These include: community support for any given pilot; economic conditions of residents, including percentage of households with CARE eligibility; mix of housing type (single family, multi-family, mobile homes); mix of homes owned versus rented; percentage of dwellings in community on an all-electric rate; percentage of homes in community heating with wood and/or propane; variety of local conditions requiring upgrades; natural gas options feasibility, based on distance to pipelines; partial availability of natural gas in a community; community size; publicly owned property in a community (special district, county, state, federal); existing solar; cumulative environmental and infrastructure vulnerability; gas and electric service provider; and geographic co-location of communities.³³ The

³⁰ "Comments of ORA on the Proposed Data Gathering Plans," March 28, 2018 at 3-4.

³¹ "Sierra Club and Natural Resources Defense Council Comments on Utilities' Data Gathering Plans," March 28, 2018 at 2-3.

³² "Pilot Team Comments on Proposed Data Gathering Plans," March 28, 2018 at 5-6.

³³ "Response of GRID Alternatives to Questions in Attachment B as Directed by the Assigned Commissioner's December 6, 2017 Scoping Memorandum and Ruling," February 15, 2018 at 24-25.

Pilot Team supports these grouping criteria and adds existence of a school in a community, the distance to confined animal facilities and privacy concerns.³⁴

TURN asserts that the Plan should target households without access to natural gas.³⁵ TURN is concerned that PG&E's proposal may exclude a significant number of customers without access to natural gas residing in large communities. TURN asserts that PG&E's proposed grouping is unlikely to result in a meaningful distinction between communities with "low" and "high" access to natural gas. Instead, TURN suggests that individual customers in each community who lack natural gas are specifically identified and targeted in any survey and that a large percentage of response rates should be possible.³⁶

4.3.2.1. Discussion

The parties have provided a robust set of possible grouping approaches for use in the Plan. In considering these, it is again important to return to the objectives of this proceeding. Drawing on Section 783.5, the Phase II Scoping Memo emphasizes the expense incurred by low-income households that lack access to natural gas and must rely on electricity, propane or wood for space and water heating.³⁷ Ensuring appropriate energy service to households in communities identified on the SJV DAC list is the central objective of this proceeding. Households that currently lack natural gas are therefore critically important but not the only useful targets of household surveys and interviews.

³⁴ "Pilot Team Responses to Attachment B to Scoping Memorandum and Ruling," February 25, 2018 at 31.

³⁵ TURN, Comments on Data Gathering Plans at 8.

³⁶ "Opening Comments of TURN on the Utilities' Proposed Data Gathering Plans," March 28, 2018 at 2 - 3.

³⁷ "Assigned Commissioner's Scoping Memorandum and Ruling," December 6, 2017 at 1.

Households that are currently using electric heating and/or water heating and that are on an all-electric rate are important to survey as well. These households may provide insights into the barriers or lack thereof to all-electric energy options.

Therefore, in developing the grouping and sampling approaches included in the Work Plan, PG&E and the Plan contractor should emphasize data gathering from 1) individual households in each community that currently lack natural gas, and 2) households that are currently on an all-electric rate (including heating and/or water heating). PG&E and the Plan contractor should consider all feasible options to ensure robust data collection from these households. In addition, in order to ensure that relevant community-wide data beyond this is collected, we direct PG&E and the Plan contractor to discuss with the Data Plan Working Group other relevant community-wide data that should be collected as a focus, in addition to these priority household targets. This could include, for instance, average energy costs for neighboring households to those without access to natural gas and/or other information. This guidance is generally consistent with PG&E's suggested grouping approach, which is reasonable and, with this modification, is approved.

As secondary grouping characteristics, we concur with PG&E that the size of a community may constrain the economic viability of future energy options such as community solar. We also concur with ORA and Sierra Club/NRDC that the Plan should ensure valid statistical analyses of key subgroups based on factors such as current home energy sources, type of home including condition of the building or envelop and key systems (electrical/plumbing), household income level, household size and tenancy or ownership status. In particular, it is important that the Plan ensure sufficient attention to dwelling ownership status;

barriers to data collection and/or affordable energy options posed by landlord-renter issues..

PG&E, the Plan contractor and the Working Group should carefully consider the secondary grouping options proposed by the Pilot Team and GRID Alternatives as they develop the Plan sampling approach and incorporate these as appropriate. Finally, as Plan data is initially gathered through surveys, interviews, pilot projects and other means, the Plan contractor and Working Group members may wish to further refine grouping criteria in order to better assess energy conditions and future options.

4.3.3. Third-Party Sources of Data

There are a variety of data sources that would be beneficial for the Utilities to consider as part of the Plan, including: CalEnviroScreen; the most recent Low Income Needs Assessment (LINA), and the Residential Appliance Saturation Survey (RASS), which is managed by the California Energy Commission.³⁸ TURN suggests accessing existing data from private vendors and third parties, indicating that propane sales data may be available at a cost comparable to obtaining survey results and could provide robust consumption estimates. TURN also emphasizes leveraging existing survey results from the Utilities' 2016-2017 time-of-use (TOU) pilots to identify and target customers lacking access to natural gas.³⁹ This survey included thousands of customers in the San Joaquin Valley and explored demographic questions that may be useful in

³⁸ "SCE's Proposed Data Gathering Plan," February 28, 2018 at A-2.

³⁹ See Nexant, Inc. and Research Into Action, "California Statewide Opt-in-Time-of-Use Pricing Pilot: Interim Evaluation," April 11, 2017, at 30 – 39 and Table 3.3-1.

identifying households without natural gas.⁴⁰ Sierra Club/NRDC suggest reviewing county assessor's office records for data on the age of homes in order to reduce the survey's scope.⁴¹

4.3.3.1. Discussion

Using existing sources of third party data to inform the Plan is a non-controversial point. The parties have identified many possible sources, some of which could be quite useful and could reduce time and expenditures associated with Plan implementation. PG&E and the Plan contractor are directed to utilize the following data sources to the extent feasible: third party data such as CalEnviroScreen, the RASS, county assessor office records, and any additional promising sources; and ratepayer-funded Utility data from the LINA and TOU opt-in and default studies. PG&E and the Plan contractor shall also investigate the cost and possible benefits of purchasing propane sales data.

In addition, we are aware that the Utilities' internal customer information systems and customer relationship management databases contain a wide amount of customer and household demographic information that could be useful to shorten timelines and reduce costs. Existing Utility data may provide valuable household characteristic information including bill payment behavior (level payment plans), household makeup (via CARE recertification efforts) and the level of energy burden experienced in a given household (via payment histories for the federal low income home energy assistance program). PG&E

⁴⁰ "Opening Comments of TURN on the Utilities' Proposed Data Gathering Plans," March 28, 2018 at 6.

⁴¹ "Sierra Club and Natural Resources Defense Council Comments on Utilities' Data Gathering Plans," March 28, 2018 at 4.

and the Plan contractor, operating under strict data security requirements, shall leverage these (and other) Utility databases in support of the Plan.

We are also aware that the Utilities routinely purchase and subscribe to a variety of third-party segmentation and demographic services as part of their customer outreach and marketing efforts for the Energy Savings Assistance (ESA), CARE and similar programs.⁴² These sources provide real estate market data that are used to determine the credit-worthiness of new customers as they establish service; they may provide insights into the vintage, amenities, ownership profiles, and other characteristics of targeted households. Where appropriate, the Utilities shall utilize these sources and make them available to support Plan implementation.

4.3.4. Coordination with Pilot Projects

As indicated, one of the areas of greatest difference between the Utility's proposed Plans is their suggested coordination approach with pilot projects authorized in Track A of this proceeding. On this topic, SCE states that the Plan should be envisioned as part of the pilot project evaluation plans proposed by each Utility in Track A. SCE proposes that the pilot project evaluation plans include the development of broader research plans, subsequent analysis to support pilot replication and case studies on barriers or other issues that cannot be ascertained in the pilot communities alone. SCE anticipates that more comprehensive data will be collected in the pilot communities than in the broader group of communities on the SJV list. SCE asserts that the "risk of

⁴² See SoCalGas ESA Program and CARE Marketing and Outreach Plan sent to SoCalGas' GO 96-B service list and the Commission's service list in A.14-11-007 July 21, 2017. See also CARE data collection efforts in Rulemaking 12-06-013.

having multiple surveyors knock on the same door" and in doing so confuse or irritate the residents" should be mitigated by requiring the Plan contractor to closely coordinate with pilot project implementers selected under Track A of this proceeding.⁴³

In contrast, PG&E states that the Phase II Scoping Memo separates Tracks A and B of this proceeding and envisions that all pilot project-related activities, including evaluation of data gathered from the pilots, are to be implemented in Track A. The Plan envisioned by PG&E in Track B is a separate effort with its own timeline and budget. PG&E further recommends that Track A and Track B data gathering efforts be conducted concurrently or on separate timelines. It recommends against including Track A pilot project evaluation activities as part of Track B data gathering, noting that contractors with specific skills in weatherization or equipment installation will participate in Track A implementation activities. These skills do not overlap with the data collection skills needed for Track B. PG&E suggests extending Track A's post-intervention evaluation period for one year, at minimum, to account for seasonable variation.⁴⁴

GRID Alternatives echoes SCE's concerns and recommends that pilot project implementers gather data for the Plan in communities where they are already planning in-home visits. GRID Alternatives suggests that the Plan gather qualitative feedback from prospective and active participants in pilot

⁴³ SCE's "Proposed Data Gathering Plan," February 28, 2018.

⁴⁴ "PG&E's Reply Comments to the Investor-Owned Utilities' Proposed Data Gathering Plans," March 28, 2018 at 2.

projects in the form of open-ended questions regarding motivations, key issues, experiences and recommendations.⁴⁵

TURN also recommends that Track A pilot projects gather data such as detailed home energy costs and appliance data that will be more widely collected under the larger Plan. To facilitate coordination, TURN suggests that the Plan contractor be tasked with creating simple mechanisms such as paper forms or tablets to allow pilot project contractors to record appliance size and model data and the like; such data can be used to test the accuracy of survey data, says TURN. Like GRID Alternatives, TURN emphasizes that pilot project participants be interviewed about their perceptions before and after pilot implementation (perceptions of propane and its impact on costs; of perceived electric or natural gas savings, relative convenience and experience with new appliances, issues with installation and/or use of new equipment; ability to reach vendors and overall pilot experience).⁴⁶ The Pilot Team echos these sentiments.⁴⁷

4.3.4.1. Discussion

We clarify here that Track A pilot project evaluation plans shall be developed and implemented using Track A authorized budgets. The Plan is a much larger effort than the potential pilot projects, and we do not yet know which or how many pilot projects may be approved on what time frame. We agree with party comments, however, that it would be preferable if Plan data

⁴⁵ "GRID Alternatives Comments on Investor-Owned Utility Data Gathering Plans," March 28, 2018 at 3-4.

⁴⁶ "Opening Comments of TURN on the Utilities Proposed Data Gathering Plans," March 28, 2018 at 3 - 8.

⁴⁷ "Pilot Team Comments on Proposed Data Gathering Plans," March 28, 2018 at 5.

collected in the possible host communities are collected by, or in close coordination with, pilot project implementers specific to any given community.

To address this, we direct PG&E and the Plan contractor to closely monitor Commission action in Track A of this proceeding regarding approval of pilot projects, as well as subsequent pilot project contracting and deployment activities. If the Plan contractor team does not directly collect and include data from the pilot projects implemented in Track A, PG&E is directed to ensure that pilot project data is collected and included in any final data collection compilation to be used for the economic feasibility study in Phase III of the proceeding. In addition, we direct PG&E to include in the RFP and scope of work for the Plan the task of creating simple mechanisms such as paper forms or tablets to allow pilot project implementers to record relevant data for use in the Plan, such as appliance size, wiring conditions, voltage levels, in the course of their activities. PG&E shall also ensure that any data collected in this way is made available to support refinement of Plan subgrouping criteria, as discussed in Section 4.3.2. above. Further, PG&E and the Plan contractor shall work to coordinate with pilot project implementers, as feasible, to standardize measurements and to use similar questions for in-house interviews and surveys for comparable and/or overlapping metrics, particularly regarding qualitative factors. As necessary, we may consider extending the pilot project post-evaluation time frame as part of a future decision on pilot projects within this proceeding.

4.4. Process for Updating the List of San Joaquin Valley Disadvantaged Communities and Adding Nine Communities to this List

D.17-05-014 identifies a list of communities that meet the requirements of Section 783.5, the SJV DAC list, but did not adopt a methodology for adding or

removing communities from this list. This section considers the question of whether any communities should be added or removed from this list prior to implementation of the Plan. We consider communities referenced in D.17-05-014 as possibly meeting the statutory criteria of Section 783.5.⁴⁸ We also adopt a procedure for adding and removing communities from the list in the future.

Several parties including SoCalGas, PG&E, the Pilot Team and Greenlining Institute, suggest that the Commission adopt a process to review and amend the SJV DAC list over time. PG&E suggests that a community should be added to the SJV DAC list only if it meets the statutory criteria for inclusion, and removed if circumstances determine that the community no longer satisfies that criteria. These parties also assert that the SJV DAC list should be continually assessed. PG&E proposes that parties wishing to amend the SJV DAC list file a motion that includes the evidence demonstrating the rationale and qualifications (or lack thereof) for doing so.⁴⁹

The Pilot Team asserts that proceeding activities are likely to yield data on additional communities that may qualify to be added to the SJV DAC list. They focus their comments primarily on Monterey Park Tract, which they say meets the intent of Section 783.5 because 25 percent of the residents would qualify for CARE if they were receiving the PG&E natural gas services and that this community is within PG&E's service territory. PG&E concurs that the percentage of a community's customers that are eligible for CARE is a more relevant criterion than the percentage that are enrolled in CARE for the purposes

⁴⁸ D.17-04-015 at 9.

⁴⁹ "PG&E's Responses to Requests for Supplemental Information," February 15, 2018 at 10-11.

of qualifying as DAC under Section 783.5.⁵⁰ The parties to this proceeding generally agree with the Pilot Team on this point.

4.4.1. Discussion

Parties generally did not propose to add or remove communities from the SJV DAC list prior to implementation of the Plan, even though sixteen communities identified in D.17-05-014 as likely meeting the statutory criteria of Section 783.5 are not currently on the SJV DAC list.⁵¹ D.17-05-014 indicates that these sixteen communities, including Monterey Park Tract, were excluded for one of two reasons: (1) the Phase I Data Working Group was unable to verify that the communities were a “Census Designated Place” (CDP) or a city in an Utility service territory; or (2), the Phase I Data Working Group was unable to verify CARE enrollments.⁵² Of these sixteen communities, Monterey Park Tract is unique because it was included in the Phase II Scoping Memo’s list of twelve potential pilot project host communities.⁵³

We consider issue one (1), above, first. In June, 2017, as directed in D.17-05-014, the Phase I Data Working Group reported that eight of ten communities excluded from the SJV DAC list had been subsequently verified as

⁵⁰ “PG&E’s Reply Comments to Party Responses to Requests for Supplemental Information,” March 19, 2018 at 10.

⁵¹ “Comments of Leadership Counsel for Justice and Accountability on Questions in Attachment 3 to Scoping Memorandum,” February 2, 2017, Exhibit A.

⁵² D.17-04-015 at 9.

⁵³ Monterey Tract Park was included as one of the communities to assess for a pilot project in a filing submitted by the Pilot Team on August 11, 2018. There was also a discussion as to whether Monterey Tract Park met the criteria for a DAC under Pub. Util. Code § 783.5 during the September 6, 2017 prehearing conference where parties generally agreed that this community met the criteria and no party objected at the PHC or in comments to including Monterey Tract Park in the list of communities to be assessed for a potential pilot project.

CDPs or cities that met all four of the Section 783.5 criteria to be considered a San Joaquin Valley disadvantaged community.⁵⁴ Although no party's Phase II comments proposed adding these eight communities to the D.17-05-014 list, we see no reason why they should not be added at this time. It is reasonable that communities known to meet the Section 783.5 criteria should be added to the SJV DAC list without delay. Therefore, we add the following communities to the SJV DAC list: Alkali Flats, Earlimart Trico Acres, Five Points, Hardwick, Hypericum (Dog Town), Madonna, Perry Colony (The Grove), and Ripperdan. PG&E shall include these eight communities within the scope of the Plan.

Regarding issue two (2), D.17-05-014 "defer(ed) to Phase II a broader consideration of communities with at least 25 percent CARE-eligible customers but less than 25 percent enrollment," and indicated that six of the sixteen communities identified by the Leadership Counsel may meet this criteria. The Data Working Group subsequently indicated that one of these six, Snelling, was not located within seven miles of a natural gas pipeline, a requirement of Section 783.5.⁵⁵ Of the remaining five, PG&E and the Pilot Team agree that 25 percent of Monterey Park Tract residents are eligible for CARE, if not currently enrolled, and should be added to the SJV DAC list. Parties to this proceeding also generally agreed at the April 28, 2018 case management conference that Monterey Park Tract meets the criteria of a statutorily-qualified SJV DAC and should be added to the SJV DAC list. However, we have

⁵⁴ "Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and Leadership Counsel for Justice and Accountability's Report on Additional San Joaquin Valley Counties' Disadvantaged Communities to Consider per D.17-05-014," June 14, 2017.

⁵⁵ *Ibid.*

insufficient information at this time to confirm if the four remaining communities (Ballico, Cowan Tract, Del Rio, and Lemon Cove CDP) meet Section 783.5 criteria.

It seems important that the data gathering effort collects sufficient information on these four communities to determine if 25 percent of residents of these communities are CARE-eligible but not enrolled. Without this information, it is premature to add the communities to the SJV DAC list. Therefore, we add Monterey Park Tract to the SJV DAC list. We also direct PG&E to file a pilot project proposal for Monterey Park Tract by September 10, 2018, consistent with the Administrative Law Judges' Ruling issued on August 3, 2018 in this proceeding. Although we decline to add the four communities of Ballico, Cowan Tract, Del Rio, and Lemon Cove CDP to the SJV DAC list at this time, we do designate them as within the geographic scope of and as included within the scope of the Plan. PG&E shall reflect this direction in the Plan and shall ensure that the contractor's Work Plan is sufficient to determine if 25 percent of residents in these communities are CARE-eligible but not enrolled. As part of Plan activities, PG&E and the Plan contractor shall update the D.17-05-014 database summarizing current information on the list of SJV DAC communities and shall include PDF and excel versions of this in the final Plan report. PG&E and the Plan contractor shall more generally work to ensure that the Plan improves data on residents' eligibility for and access to Utility natural gas and/or electric services, including in communities where a majority of residents appear to be served by municipal electric or gas utilities.

We agree that a methodology is needed to add or remove communities from the SJV DAC list going forward. To address this the Utilities, in collaboration with the Working Group, should review the need for additional

changes to the list of eligible disadvantaged communities in 2019 and every three years thereafter until this, or a successor, proceeding is closed. The Utilities shall file a short report on these review activities and a motion for modification of the list, as warranted. In addition, any party wishing to modify the SJV DAC list may submit a motion with evidence demonstrating the rationale and qualifications for any community to be added or removed at any time.

4.5. Municipal Utility Customers

Most parties assert that communities served by a combination of IOU and local municipal districts should remain on the SJV DAC list. Although not explicitly addressed in comments by parties, the implication is that such communities should also remain within the scope of the Plan.⁵⁶ This section reviews this issue.

ORA is the only party to argue that communities primarily served by municipal districts should not be on the SJV DAC list and, by implication, should not be included in the Plan.⁵⁷ All other parties appear to support including communities partially or fully served by municipal districts for either electric or natural gas within the scope of the Plan. Table 4 summarizes the possible configurations of residents' access to natural gas and electric service within the 170 DACs as stated in party comments.⁵⁸

⁵⁶ By "municipal districts," we mean local publically owned utilities as defined by the Section 9600, et seq.

⁵⁷ "ORA Comments on the Questions in Attachment B of the Assigned Commissioner's Scoping Memorandum and Ruling," February 15, 2018 at 5.

⁵⁸ "PG&E's Reply Comments to Party Responses to Requests for Supplemental Information," March 19, 2018 at 11; "Reply of TURN on Party Responses to Questions in Attachment B of the Phase II Scoping Memo," March 19, 2018 at 8-9; PG&E identifies areas around Ripon, Escalon,

Footnote continued on next page

Table 4: Configurations of DAC Residents' Electric and Natural Gas Service

Possible Configurations	Example
Majority (>50 percent) of residents served by IOU natural gas	All communities in PG&E territory other than Coalinga
Majority (>50 percent) of residents served by municipal natural gas	City of Coalinga
Selective (<50percent of residents) provided with electric service by municipal utility	7 communities partially served by Modesto and Merced Irrigation Districts
Exclusive electric service provided by municipal utility	Turlock, Monterey Park Tract
Residents not currently receiving electric or gas service from an IOU or a municipal utility	Monterey Park Tract

For communities partially served by municipal utilities, PG&E proposes that the Commission consider additional options to address residents' needs for affordable energy options such as coordination with the California Energy Commission to identify approaches for local municipal utilities or exploration of third party options.⁵⁹

4.5.1. Discussion

The composition of communities' access to electric and natural gas service within the San Joaquin Valley is complex, as Table 4 illustrates. However, it is reasonable for this proceeding to consider affordable energy options for IOU customers (or IOU-eligible customers) currently using propane or wood for space or water heating if they reside in a SJV DAC list community, regardless of

Riverbank, Oakdale, Merced, Atwater and Livingston as locations where Modesto and Merced Irrigation Districts are providing electric service to a subset of customers.

⁵⁹ "PG&E Reply Comments to Party Responses to Requests for Supplemental Information," March 19, 2018 at 11.

whether that community is primarily or partially served by a municipal utility. Therefore, all 170 previously identified DACs shall be included in the scope of the Plan. Residents of communities served by municipal utilities that are provided gas and/or electric service by an IOU (or that are eligible for such service) shall be considered within the development of Plan grouping and sampling methodologies. The design of the Plan should also take into account the need to gather additional information to confirm DAC residents' eligibility for IOU natural gas and/or electric services, including in communities where a majority of residents appear to be served by municipal electric or gas utilities. Additional understanding in this area will help the Commission consider the reasonableness of extending energy options to such communities in Phase III of this proceeding. In addition, it would be helpful for Commission staff and parties to discuss implementation of AB 2672 with the California Energy Commission. We encourage staff and parties to initiate such communications and to identify and explore collaborative options with California Energy Commission and/or municipal utilities in the affected communities.

4.6. Phasing

A study of this size and scope will of necessity be implemented in phases. Accordingly, PG&E recommends that Plan implementation include several stages of survey outreach in order to allow the Plan contractor to monitor residents' response rates and adjust follow-up plans accordingly. PG&E recommends an iterative approach and suggests that the Plan assume a wide range of possible future energy options in order to inform the widest possible range of solutions.

PG&E proposes that Plan phasing take place as follows: (1) An initial data collection, analysis and reporting phase; (2) Stakeholder discussions that identify

the most feasible energy solutions for each of the San Joaquin Valley DACs; (3) Assessment by the Commission and parties of the sufficiency of the data collected in Phase 1 to inform an economic feasibility analysis of all of the identified energy solutions; and (4) Launch of additional targeted data gathering work as needed.⁶⁰

ORA supports PG&E's proposed phasing approach and agrees that the Plan and timeline may require ongoing modifications. ORA recommends that the Commission require the Utilities to submit a Tier 1 advice letter for any adjustments or modifications to the data to be collected, method of collection or timeline approved for the Plan in this decision.⁶¹

4.6.1. Discussion

We are supportive of the basic notion of PG&E's phasing proposal, particularly given the complexity introduced by the anticipated implementation of pilot projects concurrent, to some degree, with data gathering authorized in the Plan. However, completing the economic assessment of options and authorizing extension of additional energy services to the residents of the DACs is contingent upon the Plan gathering sufficient data. Approval of any Plan phasing must not excessively delay completion of the basic data gathering activities authorized in this decision.

While we are supportive of the notion of stakeholder discussions to preliminarily identify the most feasible energy solutions and to ensure that the Plan has gathered sufficient data to assess these, as PG&E proposed, these must

⁶⁰ PG&E Data Gathering Plan, February 28, 2018.

⁶¹ "ORA Comments on Utilities' Proposed Data Gathering Plans," March 28, 2018 at 4.

be noticed to the R.15-03-010 service list and open to all parties and Commission staff. Such discussions should also occur concurrent with and consider the Plan summary memo as discussed in Section 4.8 below. Further, any resulting identification of “the most feasible energy solutions” for the DACs at such a forum must be considered highly informal and preliminary. PG&E should discuss its intended approach with the Working Group and further refine its proposed approach.

With these modifications we approve the inclusion of phasing activities in the Plan as described by PG&E. PG&E is authorized to submit a Tier 1 advice letter as needed for modifications consistent with the data gathering principles approved in this decision to the data to be collected, method of collection, phasing or timeline.

4.7. Timeline

The Utilities proposed the same timelines for their data gathering efforts, as summarized in Table 5 below. We have added the Working Group and the contractor Work Plan discussed herein in italics. SCE doubts the feasibility of completing the data gathering effort in the proposed two years, saying that studies of similar scope typically take more time to complete. Consequently, SCE indicates that it may request additional time to complete the data gathering effort at a later date. SoCalGas notes that the timeline as proposed by the Utilities needs to be supplemented in the final Plan with the inclusion of stakeholder review and approval tasks.⁶²

⁶² “SoCalGas’s Proposed Data Gathering Plan” February 28, 2018 at 1.

Table 5: Data Gathering Plan Timeline

Task	Timeframe
Scoping and Contracting	Approximately 7 months
Commission Decision	Sometime in 2018
Kickoff Meeting	Within 10 business days
<i>Data Plan Working Group</i>	<i>Within six weeks</i>
Develop Request for Proposal (RFP) Statement of Work (SOW)	2 months
Develop RFP Scorecard	
RFP Process	1 month
Score RFP Bids	3 weeks
Contract with Vendor	3 months
Study Timeframe	Approximately 7.5 months
Study Kickoff Meeting	Within 10 business days
<i>Working Group</i> Check-In Meetings	Ongoing
Develop <i>Work Plan</i> and Survey Instruments	1 month
Data Request to IOUs	3 months, concurrent with <i>Work Plan</i> , sample design/survey instrument development tasks
Data Collection/Fieldwork	
Data Cleaning and Validation	4 months
Reporting	3.5 months
Summary Results	1 month
Draft report to Working Group and CPUC	1 month
Data Gathering Workshop	10 business days
Final Report to Working Group and CPUC	1 month
Total 18.25 months	

4.7.1. Discussion

The Utilities' proposed Plan timeline is reasonable and no party objected to it. We approve it today with the following additions: (a) the formation the Working Group within six weeks; and (b) the development of a contractor Work Plan with refinements to the methodologies, timelines and other Plan elements adopted herein. The Utilities may modify the timeline as needed in consultation with the Working Group to allow for sufficient Working Group input on draft

contractor Work Products and the phasing approach approved above. Barring unforeseen circumstances, the Utilities shall complete the Plan within two years.

4.8. Deliverables

SCE and PG&E's proposed plans took a somewhat different approach to contractor deliverables. SCE suggests that the deliverables be limited to topline summary data reports, basic information on the communities and a database that can be used to inform the Phase III economic feasibility assessment. SCE suggests that deliverables not include a comprehensive report or economic analysis of the data.

In contrast, PG&E argues that the Plan contractor should provide a comprehensive report that summarizes all of the information obtained from the data gathering effort. PG&E argues this report should, at minimum, include information necessary to establish baseline conditions, such as summary statistics for each survey question reported out by the relevant groupings and potentially even at the level of each individual DAC, with data appropriately anonymized. PG&E also proposes that the Plan contractor quantify the energy burdens faced by the DACs using the data collected in order to streamline Utility and party understanding of baseline conditions in the DACs. Finally, PG&E proposes that the Plan contractor provide a memorandum on initial findings from the study and present these findings at a workshop soliciting community feedback prior to developing a final report.⁶³ Similarly, Sierra Club/NRDC recommend that Plan deliverables include summary data reports and the

⁶³ PG&E Proposed Data Gathering Plan, February 28, 2018.

provision of a database for use in the economic feasibility analysis, stating that this will help contain costs.

Two parties commented on the issue of the confidentiality of customer identifying information and sensitive business information. PG&E states that information about customers' participation in low-income or other programs can be included in the Plan. However, this data may include confidential customer-identifying or other commercially-sensitive information that PG&E will not release until appropriate nondisclosure agreements (NDAs) and additional safeguards are in place.⁶⁴ GRID Alternatives argues that implementers of any pilot projects approved in Track A should have access to the data collected through the Plan in a manner that protects customer privacy and proprietary business information. GRID Alternatives states that utility provision of data must be subject to "proper data anonymizing and aggregation techniques to maintain customer and commercial privacy." This can be accomplished through NDAs between Utilities, the Plan contractor and third-party implementers.⁶⁵

4.8.1. Discussion

The Commission has previously provided extensive guidance on requirements to protect the confidentiality of individual customer data and sensitive or proprietary business data.⁶⁶ The Utilities and the Plan contractor are required to adhere to this guidance as they implement the Plan and release Plan

⁶⁴ *Ibid.*

⁶⁵ "GRID Alternatives' Comments on Data Gathering Plans," March 28, 2018 at 2-3.

⁶⁶ Including, but not limited to, D.06-06-066 and Appendices; D.11-07-056 and Appendices; D.14-05-016; D.16-08-024.

contractor deliverables. However, we are sympathetic to the idea that implementers of authorized Track A pilot projects should be permitted to access appropriately aggregated and anonymized data relevant to the communities where they are working. In addition, Commission staff and parties to this proceeding will find it useful to have access to appropriately aggregated and anonymized data collected under the Plan during Phase III's consideration of economic feasibility options. SCE's proposal for containing Plan costs through constraining requirements for deliverables is commendable but will not provide parties and the Commission with sufficient information for Phase III.

Therefore, we approve PG&E's proposal with some modifications. Plan contractor deliverables, in addition to the Work Plan, shall include: (1) A comprehensive Final Report that summarizes all of the information obtained from the data gathering effort, including information necessary to establish baseline conditions; (2) Summary statistics for each survey question reported out by the relevant groupings, and/or at the level of each individual DAC, as needed; (3) Quantification of the energy burdens faced by the DACs; (4) A memorandum summarizing initial findings from the study; (5) A workshop presenting initial memorandum findings and soliciting party and community feedback; and (6) A database containing collected information and a user guide to the database that is provided to the Commission and to interested parties. Commission staff may provide further clarification on nuances of these deliverables over the course of the study.

In completing these deliverables and throughout Plan implementation, PG&E, SCE, SoCalGas and the Plan contractor shall appropriately protect all customer-specific data and commercially-sensitive proprietary information gathered or utilized in the Plan process against any unauthorized disclosures.

PG&E, SCE, SoCalGas and the Plan contractor shall also ensure that any authorized disclosures comply with relevant state and federal laws and Commission customer privacy decisions, including D.06-06-066 and Appendices, D.11-07-056 and Appendices, D.14-05-016, and, D.16-08-024. PG&E, SoCalGas and SCE shall establish NDAs with the Plan contractor and other entities as appropriate and necessary to accomplish this.

In addition, it is important for CBOs, community liaisons, pilot project implementers participating in the Plan implementation or pilot projects to be confident that Utilities and pilot project implementers will keep individual customer and sensitive business data confidential. We direct the Utilities to prepare a short Data Confidentiality Protection Strategy (Strategy) to provide to interested Plan participants and residents of the identified communities. PG&E, SCE and SoCalGas shall develop and make available such a Strategy to customers contacted as part of the Plan, interested CBOs and parties.

5. Budget and Cost Recovery

None of the Utilities included a proposed budget in their February 14, 2018 Plan submittals.⁶⁷ However, SCE included a small, unspecified level of budget for data collection associated with its proposed pilot projects within the Administrative costs section of its Schedule of Expenditures, provided in response to the Scoping Memo.⁶⁸ SCE proposed that the pilot project be funded as an incremental program within its Public Purpose Program rate component.⁶⁹

⁶⁷ "SoCalGas's Proposed Data Gathering Plan," February 28, 2018; "PG&E's Proposed Data Gathering Plan, February 2, 2018; "SCE's Proposed Data Gathering Plan," February 28, 2018.

⁶⁸ "SCE's Proposed Pilot Projects in Response to Scoping Memo," January 31, 2018 at A-14.

⁶⁹ *Id.* at A-25.

PG&E proposes that cost recovery for data gathering expenses related to gas pilot projects come from its gas Core Fixed Cost Account and Noncore Customer Class Charge Account. For data collection related to electrification pilot projects, PG&E proposes recovery from its electric Distribution Revenue Adjustment Mechanism. SoCalGas requests Commission approval of a two-way balancing account for SoCalGas to record and recover the costs of the Plan.⁷⁰

ORA, the Pilot Team and TURN agree with SCE that costs for the Plan should be collected through Public Purpose Program non-bypassable charges, similar to other programs like the ESA Program, the Electric Program Investment Charge (EPIC), and energy efficiency programs.⁷¹ ORA opposes PG&E's proposal to collect costs through distribution rates as ratepayer funds will not be used for traditional distribution infrastructure such as poles and wires.⁷²

ORA further recommends that the Commission establish a cost cap for the Plan and require the Utilities to submit a Tier 2 advice letter with a detailed budget estimate and cap.

5.1. Discussion

Given the purpose of the Plan is to collect data that will be subsequently used to support the statutorily-required analysis and development of new programs or activities, non-bypassable Public Purpose Program charges are the most appropriate place to recover Plan costs. The Utilities will also need to recover their administrative costs to develop and manage the Plan, and it is reasonable that they do so through Public Purpose Program charges. The Plan is

⁷⁰ "SoCalGas's Proposed Data Gathering Plan," February 28, 2018 at 5.

⁷¹ "Pilot Team Comments on Proposed Data Gathering Plans," March 28, 2018 at 1.

⁷² "ORA Comments on Utilities' Proposed Data Gathering Plans," March 28, 2018 at 2-3.

undertaking study efforts similar to those undertaken in low-income proceedings such as the IOU's CARE and ESA proceedings. Study results will contribute to the possible development of new program options for disadvantaged communities in the San Joaquin Valley and may inform modification of existing CARE and ESA programs to better serve valley residents.

The Utilities shall therefore record and recover all Plan costs within their non-bypassable Public Purpose Program charges up to the amount approved in the Tier 2 advice letter within the cost cap set in this decision for the proposed budget. These costs may include the administrative costs incurred by the Utilities, Plan contractor or consultant-related costs, and other reasonable costs incurred to implement the Plan including, for example, facilitator costs, and incentives, travel stipends and/or per diems for participating SVJ residents and/or community liaisons. In addition, SoCalGas's request to establish a two-way balancing account to track expenses related to the Plan is denied. Two-way balancing accounts are primarily important when revenue generation may result from authorized activities and this is not the case for the plan.

We direct PG&E, SCE and SoCal Gas to submit a Tier 2 advice letter within 60 days of the effective date of this decision that establishes a new memorandum account to record and recover costs associated with the Plan, as needed, including administrative costs, and that proposes a recommended approach for tracking, recording and recovering the costs associated with the Data Gathering Plan. The advice letter may include a proposed split for the percentage of costs associated with gas and the percentage associated with electric costs, a proposed rate design, a proposal for incorporating a gas Public Purpose Program cost into surcharge rates and true-up of costs. The Tier 2 advice letter may also include

additional proposals or recommendations that are necessary to implement the requirements of this Decision. Further, we direct PG&E, SCE and SoCalGas to submit as part of this, or the Tier 2 or Tier 3 advice letter directed below, a proposed allocation of Plan costs among the Utilities that is consistent with the direction provided in this decision. If PG&E, SCE and SoCalGas are unable to agree on a proposed allocation, then each Utility is authorized to submit an argument for a proposed allocation of up to one page in length (double spaced).

We agree with the ORA on the need to cap the total budget authorized for the Plan. The Utilities did not provide any budget estimates and therefore we must rely on experience with similar studies performed in the past such as previous LINA studies that perform phone surveys and in-person focus groups, CBO interviews and ride-alongs.⁷³ D.16-11-022 approved the 2019 LINA study with a budget of \$500,000.⁷⁴ The LINA study is somewhat similar in methodology but the proposed Plan may be more complex. The Utilities 2016 TOU studies provide an additional benchmark. These studies have reported costs of between \$3 million to \$11 million with between 11,250 and 400,000 participants.⁷⁵

Since we do not yet have firm estimates of the number of participants that will be included in the Plan, we adopt an initial budget target for the Plan of \$3 million. We direct PG&E to strive to complete the Plan as approved in this

⁷³ See “Needs Assessment for the Energy Savings Assistance and the California Alternate rates for Energy Programs,” Evergreen Economics for the CPUC, PG&E, SCE and SoCalGas (2016) at 19-35. <http://www.cpuc.ca.gov/iqap/>.

⁷⁴ D.16-11-022 at 177.

⁷⁵ See R.12-06-013, “Progress on Residential Rate Reform” February and May 2018 quarterly reports.

decision within this \$3 million budget level. However, as the full extent of reasonable costs associated with implementing the Plan as directed herein are not clear at this time, we direct PG&E to submit a Tier 2 advice letter with a detailed Plan budget for costs up to \$3 million within 60 days of the effective date of this decision; if the proposed budget exceeds \$3 million, PG&E is directed to submit a Tier 3 advice letter, not to exceed a hard budget cap of \$6 million, within 60 days of the effective date of this decision.

6. Comments on Proposed Decision

The proposed decision of ALJs Fogel and Houck 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 August 13, 2018 by PG&E, SCE, SoCalGas, ORA, GRID Alternatives, Greenlining, and the Pilot Team. Reply comments were filed on August 20, 2018 by the Pilot Team, ORA, and PG&E.

Party comments provided a range of clarifications that have been reflected in the final decision. Amongst these were suggestions by the Utilities to provide further guidance on the development of Public Purpose Program charges and cost allocations across the Utilities, and to authorize the Utilities to submit Tier 2 advice letters addressing these topics. Several parties – PG&E, Greenlining and the Pilot Team – suggested that a \$3 million cap may be too low for Plan implementation and that some means should be provided to authorize funding above this, as needed, based on a detailed budget reflecting the scope of this decision. The Utilities also requested clarification that their administrative costs to develop, administer and report on the Plan would be included within this Plan budget.

Parties provided additional helpful comments in a number of areas including but not limited to: data elements, Working Group co-chairs and processes, Plan contractor requirements, Plan and pilot project coordination, and financial support to SJV DAC residents and community liaisons for participating in the Plan. We have considered the comments submitted and have made adjustments to this decision as deemed appropriate. We have correspondingly updated the approved Data Gathering Plan contained in Attachment A.

7. Assignment of Proceeding

Commissioner Martha Guzman Aceves is the assigned Commissioner and Cathleen A. Fogel and Darcie L. Houck are the assigned ALJs in this proceeding.

Findings of Fact

1. Implementation of the Plan by a single, statewide contractor would help ensure that work is implemented consistently across all SJV DACs.

2. PG&E's service territory includes 131 of the 170 SJV DACs identified in D.17-05-014.

3. A co-funding agreement between PG&E, SCE and SoCalGas will be necessary to track costs and expenses among the Utilities.

4. Further stakeholder discussion is needed on the level of technical detail required for certain data elements.

5. In-home visits will likely be needed to obtain certain data such as the conditions of home electrical wiring or voltage levels.

6. Some residents of the SJV DACs will not have internet access and may be reluctant to participate in phone surveys without context and reassurance provided by community liaisons or CBOs.

7. Surveys and interviews with community residents provide opportunities to raise awareness about and to enroll households in existing low-income

programs such as the ESA and CARE programs and/or the medical baseline program.

8. Households that are currently on all-electric rates (electric heating and water heating) may provide insights into the barriers or lack thereof to all-electric energy options.

9. An important secondary sample grouping criterion is the size of a community as this may constrain the economic viability of future energy options.

10. Initial data gathered through Plan surveys and interviews, Track A pilot projects and other means may enable further refining of grouping criteria.

11. A 2016 TOU study authorized by the Commission included thousands of customers in SJV DACs and many demographic questions that may be useful in identifying such households without natural gas.

12. The Utilities' internal customer information systems and customer relationship management databases contain a wide amount of customer and household demographic information that could be useful to shorten timelines and reduce the costs of data collection.

13. The Utilities routinely purchase and subscribe to a variety of third-party segmentation and demographic services as part of their customer outreach and marketing efforts for the ESA, CARE and similar programs.

14. D.17-05-014 identified a list of 170 communities that met the criteria set forth in Section 783.5 but did not adopt a methodology for adding or removing communities from this list.

15. D.17-05-014 identified sixteen communities that may fit the statutory criteria of Section 783.5 but were excluded from the list of SJV DACs either for lack of verification that they are a CDP or a city in an IOU service territory (ten communities) or for lack of verification of CARE enrollments (six communities).

16. Eight of ten communities excluded from the D.17-05-014 list for lack of verification as a city or a CDB were subsequently verified as such.

17. The Communities of Alkali Flats, Earlimart Trico Acres, Five Points, Hardwick, Hypericum (Dog Town), Madonna, Perry Colony (The Grove), and Ripperdan meet all of Section 783.5 criteria as a disadvantaged community.

18. Snelling, one of the six communities for which CARE enrollments were not verified, is not located within seven miles of a natural gas pipeline, a requirement of Section 783.5.

19. Twenty five percent or more of Monterey Park Tract residents are eligible for CARE, although they are not currently enrolled.

20. We have insufficient information to confirm if 25 percent of the residents of Ballico, Cowan Tract, Del Rio, and Lemon Cove CDP are eligible for CARE.

21. It will be important for CBOs and community liaisons participating in the Plan or future pilot projects approved in Track A of this proceeding to be confident that the Utilities and pilot project implementers will keep individual customer and sensitive business data confidential.

22. Study results will contribute to the possible development of new program options for disadvantaged communities in the San Joaquin Valley and may inform modification of existing CARE and ESA programs to better serve valley residents.

23. Utility TOU pilot studies incurred between \$3 million and \$10.5 million in costs to reach between 10,000 and 400,000 customers and the 2016 LINA study cost \$500,000.

24. Utility TOU and LINA studies provide a benchmark for likely Plan costs

Conclusions of Law

1. It is reasonable to consolidate PG&E, SCE and SoCalGas's proposed data gathering plans into one comprehensive Plan.

2. It is reasonable for the Utilities to select a Plan contractor through a competitive RFP bidding process, and to require the Plan contractor to draft a Work Plan and a data gathering survey instrument, to administer the survey, and to process and summarize the data.

3. It is reasonable for PG&E to be the Responsible Party to lead the RFP process and to put in place co-funding agreements with SCE and SoCalGas.

4. It is reasonable for Commission staff to oversee the Plan RFP process led by PG&E and to require PG&E to provide its draft RFP and scope of work to Commission staff for review and approval.

5. It is reasonable to require winning bidders for the Plan to demonstrate substantial knowledge of, with a preference for actual experience in, the San Joaquin Valley, the ability to implement the Plan in multiple languages and a culturally appropriate manner and to describe how they will reach non-English speaking residents, people with disabilities, and households that may be reluctant to provide information.

6. It is reasonable for PG&E to establish a Working Group to provide advisory input into the contractor's Work Plan and other Plan deliverables.

7. It is reasonable for PG&E to solicit input on the scope of work for the RFP from Working Group members, parties and others in a publicly noticed meeting.

8. The Plan meets the goals for data gathering set out in the Phase II Scoping Memo and outlined in D.17-05-014.

9. It is reasonable for PG&E and the Plan contractor to discuss the topic of pending under-ground infrastructure improvements with the Data Plan Working

Group and seek to identify if there are any priority communities on the SJV DAC list for which collection of such information at this stage would be important.

10. If PG&E and the Data Plan Working Group agree, it is reasonable for the Plan contractor to collect high-level community data on pending under-ground infrastructure improvements, within reasonable cost limits, by such means as contacting local county offices, the State Water Resources Control Board or other approaches, as deemed reasonable, and that do not increase the cost for completing the Plan.

11. It is reasonable that the Plan methodologies are determined following the engagement of a Plan contractor, with input from the Working Group, and that these are summarized in a contractor Work Plan.

12. It is reasonable that Plan survey and interview data be collected in English and other languages consistent with the community surveyed and in a culturally appropriate manner.

13. It is reasonable that residents of the San Joaquin Valley are financially supported, as appropriate, to participate in Plan surveys, interviews, and meetings, through the use of survey incentives, travel stipends, per diems and/or similar means within the budget cap authorized by this decision.

14. It is reasonable that community liaisons assisting communities with participating in the Plan are financially supported, as appropriate, for this work within the budget cap authorized in this decision.

15. It is reasonable for PG&E and the Plan contractor to emphasize data gathering from households that currently lack natural gas and are on all-electric rates (including heat and water heating) when developing Plan grouping and sampling approaches, and to consider all feasible options to ensure robust data collection from these customers.

16. It is reasonable for the Data Plan Working Group to also identify additional community-level data that should be collected in addition to information from targeted households, such as energy costs paid by neighbors to households lacking natural gas, or other relevant information.

17. It is reasonable that the Plan ensures valid statistical analyses of key subgroups based on factors such as current home energy sources, type of home including condition of the building or envelop and key systems (electrical/plumbing), household income level, household size and tenancy or ownership status.

18. It is reasonable that Plan surveys and interviews with residents raise awareness about existing low-income programs and help enroll interested customers.

19. It is reasonable for PG&E and the Plan contractor, operating under strict data security requirements, to leverage existing Utility databases in support of the Plan.

20. It is reasonable that implementation of the Plan and any authorized Track A pilot projects are closely coordinated activities that operate under separate budgets and separate or concurrent timelines.

21. It is reasonable for PG&E and the Plan contractor to monitor Commission action on Track A pilot projects and that implementers of authorized Track A pilot projects are integrated into the Plan data collection processes where feasible.

22. It is reasonable for PG&E to include in the Plan RFP and scope of work the task of creating mechanisms to allow authorized Track A pilot project contractors to record data for use in the Plan.

23. It is reasonable that data gathered through pilot projects that may be approved in Track A of this proceeding are used to refine initial grouping criteria, as feasible.

24. It is reasonable for PG&E and the Plan contractor to coordinate with pilot project implementers, as feasible, to standardize measurements and to use similar questions for in-house interviews and surveys for comparable and/or overlapping metrics, particularly regarding qualitative factors.

25. It is reasonable to establish a procedure for adding or removing communities from the SJV DAC list adopted in D.17-05-014.

26. It is reasonable for the Utilities, in collaboration with the Working Group, to review the need for additional changes to SJV DAC list in 2019 and every three years thereafter until this or a successor proceeding is closed.

27. It is reasonable for the Utilities to file a short report on these review activities every three years and a motion to modify the SJV DAC list as warranted.

28. It is reasonable that any party that wishes to modify the SJV DAC list of submit a motion with evidence demonstrating the rationale and qualifications for any community to be added or deleted.

29. It is reasonable for Communities known to meet the four Section 783.5 criteria to be added to this proceeding's SJV DAC.

30. It is reasonable to add Alkali Flats, Earlimart Trico Acres, Five Points, Hardwick, Hypericum (Dog Town), Madonna, Monterey Park Tract, Perry Colony (The Grove), and Ripperdan to this proceeding's SJV DAC list and to include these communities in the Plan.

31. It is reasonable that the communities of Monterey Park Tract, Ballico, Cowan Tract, Del Rio, and Lemon Cove CDP are included in the Plan.

32. It is reasonable for the Plan to collect sufficient information to determine if 25 percent of residents of the communities of Ballico, Cowan Tract, Del Rio, and Lemon Cove CDP would be CARE-eligible if they received service from an IOU.

33. It is reasonable for this proceeding to consider affordable energy options for IOU customers (or IOU-eligible customers) currently using propane or wood for space or water heating if they reside in a SJV DAC, regardless of whether that community is primarily or partially served by a municipal utility.

34. It is reasonable for PG&E and the Plan contractor to update the D.17-05-014 excel database summarizing current information on the list of SJV DAC communities to include PDF and excel versions of this in the final Plan report.

35. It is reasonable for the Plan to gather information to confirm residents' eligibility to IOU natural gas and/or electric services, including in communities partially or primarily served by municipal electric or gas utilities.

36. It is reasonable for Plan implementation to include formal, professional energy audits to identify household conditions that may impact equipment installation requirements and needed equipment improvements and to estimate costs for these requirements and improvements, for a representative sample of the households, within the scope of the Plan and the Plan budget.

37. It is reasonable for the Plan to take an iterative approach and to assume a wide range of possible future energy options.

38. It is reasonable for the Plan to take a phased or iterative approach and to assume a wide range of possible future energy options.

39. It is reasonable for phasing of the Plan to allow for parties and stakeholders to consider preliminary results and to discuss feasible energy options in a publicly noticed meeting.

40. It is reasonable to authorize PG&E to submit a Tier 1 advice letter to request modifications to the data to be collected, method of collection, phasing or timeline for data collection consistent with the principles approved in this decision.

41. State and federal law and Commission customer privacy decisions, including D.06-06-066 and Appendices, D.11-07-056 and Appendices, D.14-05-016, and, D.16-08-024, require the Utilities to protect all customer-specific data and commercially-sensitive information against any unauthorized disclosures and set forth requirements for any authorized disclosures of such data and information.

42. It is reasonable for the Utilities to develop a Strategy and to provide this to interested Plan participants, residents of the identified communities, and CBOs.

43. It is reasonable that Plan contractor deliverables allow and consider participation from non-Utility parties and the Commission and provide guidance on the development of economic feasibility assessments in Phase III of this proceeding.

44. It is reasonable that Plan deliverables include summary statistics for each survey question, quantification of communities' energy burdens, the provision of a database for use in the Phase III economic feasibility analysis, an initial summary memorandum that is presented for community and party feedback, and a comprehensive final Plan report.

45. It is reasonable that non-bypassable Public Purpose Program charges be used to record and recover Plan costs, to include, but not limited to,

administrative costs incurred by the Utilities, contractor or consultant-related costs to administer and implement the Plan, and other reasonable costs incurred to implement the Plan including, for example, facilitator and/or co-chair costs, and incentives, travel stipends and/or per diems for participating SVJ residents and/or community liaisons.

46. It is reasonable to identify a budget cap for the Plan based on experience with previous similar studies such as the LINA and TOU studies.

47. It is reasonable to adopt a \$3 million budget target for the proposed budget and to require a Tier 2 advice letter for budget proposals up to this amount, and to require any proposed budget above \$3 million (but not to exceed \$6 million) to be reviewed and approved through a Tier 3 advice letter.

48. It is reasonable to require PG&E to submit a detailed Plan budget estimate in a Tier 2 or Tier 3 advice letter within 60 days.

O R D E R

IT IS ORDERED that:

1. Pacific Gas and Electric Company, Southern California Edison Company and Southern California Gas Company's proposed Data Gathering Plans are consolidated and approved as modified in today's decision. The conformed version of the Data Gathering Plan in Attachment A reflects the modifications adopted today.

2. Pacific Gas and Electric Company, Southern California Edison Company and Southern California Gas Company are directed to select a single Data Gathering Plan contractor through a competitive request for proposal process and shall put in place a co-funding agreement to enable this process.

3. Pacific Gas and Electric Company shall lead the contracting process, oversee the selected contractor's work, establish a Data Plan Working Group, manage all Working Group logistical and administrative functions, and co-chair the group with a ratepayer advocate and a community-based organization.

4. Pacific Gas and Electric Company, Southern California Edison Company and Southern California Gas Company are directed to: (1) appropriately protect all customer-specific data and commercially-sensitive proprietary information gathered or utilized in the Data Gathering Plan process against any unauthorized disclosures; and (2) ensure that authorized disclosures comply with relevant state and federal laws and Commission customer privacy decisions, including Decision (D.) 06-06-066 and Appendices, D.11-07-056 and Appendices, D.14-05-016, and, D.16-08-024.

5. Pacific Gas and Electric Company (PG&E) is directed to submit a Tier 2 advice letter with a detailed Data Gathering Plan budget for costs up to \$3 million within 60 days of the effective date of this decision; if the proposed budget exceeds \$3 million, PG&E is directed to submit a detailed Data Gathering Plan budget and a Tier 3 advice letter, not to exceed a hard budget cap of \$6 million, within 60 days of the effective date of this decision.

6. Pacific Gas and Electric Company, Southern California Edison Company and Southern California Gas Company (Utilities) are directed to submit within 60 days of the effective date of this decision, as part of a Tier 2 or Tier 3 advice letter directed herein, a proposed allocation to each Utility of the Data Gathering Plan budget consistent with the direction provided in this decision, or, if the Utilities are unable to agree on a proposed allocation, each Utility is authorized to file an argument for a proposed allocation of up to one page, double spaced.

7. Pacific Gas and Electric Company, Southern California Edison Company and Southern California Gas Company shall use the funding authorized in this decision to recover costs to complete the tasks identified herein and to reimburse the contractor retained to implement the Plan.

8. The nine communities of Alkali Flats, Earlimart Trico Acres, Five Points, Hardwick, Hypericum (Dog Town), Madonna, Monterey Park Tract, Perry Colony (The Grove), and Ripperdan are added to list of San Joaquin Valley disadvantaged communities adopted in Decision 17-05-014 and are included within the scope of the Data Gathering Plan.

9. The communities of Ballico, Cowan Tract, Del Rio, Lemon Cove CDP are designated within the geographic scope of and are included within the scope of the Data Gathering Plan.

10. Pacific Gas and Electric Company is directed to file a proposed pilot project for Monterey Park Tract by September 10, 2018, consistent with the Administrative Law Judges' Ruling issued on August 3, 2018 in this proceeding.

11. Pacific Gas and Electric Company, Southern California Edison Company and Southern California Gas Company, in collaboration with the Data Plan Working Group, shall review the need for changes to the list of San Joaquin Valley disadvantaged communities in 2019 and every three years thereafter until this or a successor proceeding is closed and shall file a motion for modification as warranted.

12. Any party that wishes to modify the list of disadvantaged communities may file a motion at any time until this or a successor proceeding is closed. The motion should include testimony demonstrating the rationale and qualifications for a community to be added or deleted.

13. Pacific Gas and Electric Company, Southern California Edison Company and Southern California Gas Company (Utilities) shall recover costs for the Data Gathering Plan (Plan) within their non-bypassable Public Purpose Program charges, including, but not limited to, administrative costs incurred by the Utilities associated with developing, supporting and reporting on the Plan, contractor or consultant-related costs to administer and implement the Plan, and other reasonable costs incurred to implement the Plan.

14. Pacific Gas and Electric Company, Southern California Edison Company and Southern California Gas Company are directed to file a Tier 2 advice letter within 60 days of the effective date of this decision to establish a new memorandum account to record and recover costs associated with the Plan, as needed, including Utility administrative costs, and that proposes a recommended approach for tracking, recording and recovering the costs associated with the Data Gathering Plan, which may include a proposed split for the percentage of costs associated with gas and the percentage associated with electric costs, a proposed rate design, a proposal for incorporating a gas Public Purpose Program cost into surcharge rates and true-up of costs, and additional proposals or recommendations that are necessary to implement the requirements of this Decision.

15. Pacific Gas and Electric Company is authorized to submit a Tier 1 advice letter with modifications consistent with the data gathering principles approved in this decision to the method of data collection, phasing or timeline.

16. All pending requests and motions concerning Track B -Data Gathering Plan of Phase II of this proceeding not granted in this decision are deemed denied.

17. Rulemaking 15-03-010 is held open for consideration of Track A pilot project proposals and other matters.

This order is effective today.

Dated August 23, 2018, at San Francisco, California.

MICHAEL PICKER

President

CARLA J. PETERMAN

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

Commissioners

ATTACHMENT A

SAN JOAQUIN VALLEY

DISADVANTAGED COMMUNITIES

DATA GATHERING PLAN

R.15-03-010

August 23, 2018

I. PURPOSE AND SCOPE OF THE PROPOSED DATA GATHERING PLAN

On March 26, 2015, the California Public Utilities Commission (Commission) issued an Order Instituting Rulemaking to address the enactment and implementation of Section 783.5. Section 783.5 requires the Commission first to identify disadvantaged communities (DACs) in the San Joaquin Valley meeting specific income, geographic, and population requirements and then to analyze the economic feasibility of the three categories of energy options: (a) extending natural gas pipelines, (b) increasing existing program subsidies to residential customers, and (c) other alternatives that would increase access to affordable energy. Eligible DACs were identified as part of Phase I, and Phase II of this proceeding includes two tracks to address the implementation of pilot projects as well as data gathering needs for evaluation of economically feasible potential energy options for all identified disadvantaged communities.

This Statewide Data Gathering Plan provides a proposed framework for capturing information on the identified San Joaquin Valley Disadvantaged Communities. As noted by the Commission, the approved Data Gathering Plan will define the information needed in Phase III “to conduct the economic feasibility study required by AB 2672.” The Data Gathering Plan is presented in five sections:

1. Data Gathering Needs and Data Elements
2. Implementation
 - A. Statewide Coordination
 - i. Plan Contracting
 - ii. Data Gathering Plan Working Group
 - iii. Updated list of SJV DACs
 - B. Collecting Customer-Originated Data
 - C. Survey Sample Design
 - D. Other Survey Considerations
 - E. Coordination with Potential Track A Pilot Projects
3. Reporting and Analysis
4. Cost Recovery, and
5. Proposed Data Gathering Timeline.

II. DATA GATHERING NEEDS

In its Scoping Memo the Commission notes, “the [Phase III] 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 II of the proceeding will need to include all information necessary to address each of these considerations.” The Commission also notes that the Data Gathering Plan should involve “identification of existing energy programs or tariffs already available to the identified disadvantaged communities that could increase access to affordable energy.”

In order to maximize the usefulness of the data collected and inform an economic feasibility analysis, PG&E will take an iterative approach. PG&E will design an initial data gathering plan that assumes a range of energy options to gather a large swath of information that may inform potential energy solutions. Following the initial collection, PG&E will support a discussion with a Data Plan Working Group (which PG&E will establish, see below), parties to R.15-03-010 and San Joaquin Valley stakeholders of the data collected to informally and preliminarily identify what energy solutions would be most feasible for each DAC. PG&E will then work with the Working Group and parties to assess whether the data collected up to that time is sufficient to inform an economic feasibility analysis of the selected energy solutions or if more targeted work is needed.

For purposes of outlining its proposed initial data gathering needs, PG&E divides the range of data needs according to their method of collection: 1) Customer-originated data, 2) Utility record data, and 3) Third-party data.

A. Customer-Originated Data

A major component of the Data Gathering Plan is obtaining data to establish customers’ baseline energy and home conditions. This category of information includes data about customers’ energy sources, energy costs, home characteristics, and household demographics. This data is best obtained directly from the customer, as the IOUs and third parties may not have direct access to this information. The following categories of information defined in Attachment C of the Scoping Memo² are best obtained directly from customers:

Current energy sources (including appliance type, age and location in home)
Home heating

² Attachment C to the Scoping Memo is a proposed data gathering matrix that outlines different possible data sources and methods to inform the data gathering plan.

Water heating
Home cooling
Cooking
Clothes drying
Insulation

Current energy costs (annual and seasonal)

Propane
Wood
Electricity³
Other fuel type (specify)

Attributes of home

Rent/own
Age of home
Type of home
Home internal electrical conditions
Roof characteristics

Square footage
Demographics
Household income
Address or census block
Household size
Bill transiency/tenancy
Age of tenants
Disabilities

In addition to the above information, the following additional topics should be considered:

- Effective energy saving practices
- Real and perceived challenges with paying energy bills
- Awareness of and participation in existing low-income programs
- Community capacity and interest (ex. experience with community outreach related to energy solutions, effective outreach methods).

The procedure for obtaining this customer-originated data is discussed in the Implementation section.

B. Utility Program Data

Information about a number of PG&E's, Southern California Edison (SCE) and Southern California Gas's (SoCalGas) programs (energy efficiency, low income assistance, and targeted customer programs identified in this section) as well as many other programs can directly inform the Phase III economic feasibility analysis. However, much of the utility record data may include confidential customer-identifying or other commercially-sensitive, proprietary, or trade-secret information. PG&E, SCE and SoCalGas (the Investor Owned Utilities, or IOUs) will not release confidential information for limited use until appropriate nondisclosure agreements are in place, and will ensure safeguards are in place before any disclosure of customer-identifying or commercially-sensitive data.

In order to better refine the scope of data gathering of utility-related data, the Data Gathering Plan Working Group and the Plan contractor (see below) should identify the range of energy options that would be most feasible for each DAC.

The IOUs have provided an overview of potentially relevant energy efficiency programs in their February 15, 2018 filings in R.15-03-010. In their filings the IOUs provide information about 1) Residential energy efficiency programs that directly serve residential customers, 2) Residential EE programs that incentivize manufacturers and distributors to lower the cost of energy efficient equipment or increase availability of energy efficiency equipment to residential customers, and 3) Residential Energy Efficiency Financing programs that facilitate making energy efficient improvements for residential customers.

In addition, IOU customers can participate in other programs not directly related to energy efficiency that may help them better manage their energy costs. The CPUC has cited a number of assistance programs such as 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), and others.

Other useful utility data that the IOUs will explore and utilize, as appropriate, in the Plan includes:

- Data from IOU time-of-use opt-in and default studies

- Internal customer information systems and customer relationship management databases (data on customer and household demographic information), including:
 - Bill payment behavior
 - Household makeups
 - Energy burden levels
- Third-party segmentation and demographic data purchased or subscribed to as part of marketing and outreach for ESA, CARE and similar programs, such as real estate market data.

The IOUs will appropriately protect all customer-specific data and commercially-sensitive proprietary information gathered or utilized in the Data Gathering Plan process against any unauthorized disclosures and will ensure that any authorized disclosures comply with relevant state and federal laws and Commission customer privacy decisions, including D.06-06-066 and Appendices, D.11-07-056 and Appendices, D.14-05-016, and, D.16-08-024.

C. Third Party Data

Third Party data can provide demographic insights that are not readily available from utility records. This includes census data or data available from other studies or initiatives such as CalEnviroScreen or the Low Income Needs Assessment (LINA).

CalEnviroScreen is a screening methodology that may be used to help identify California communities that are disproportionately burdened by multiple sources of pollution and with population characteristics that make them more sensitive to pollution. The overall CalEnviroScreen score may be used to identify overall pollution and health disparities between communities. However, the tool may be limited in identifying communities disproportionately impacted by a lack of access to natural gas resulting in wood- or propane burning in place of natural gas. Although CalEnviroScreen has good indicators for outside air quality as a result of combustion vehicles, area, and point sources as demonstrated by individual ozone, PM2.5, and diesel PM emissions scores, the tool is not designed to measure indoor air quality which is most affected by wood burning and propane.

The LINA study is a statewide study conducted every three years pursuant to AB 327. Study topics vary by year and are chosen through stakeholder input. The most recent LINA, released in 2016, examined topics including energy burden and insecurity, program accessibility and unique customer needs, beneficial energy efficiency (and other) measures, and income documentation. While the LINA may be used to inform specific topics that are relevant to our study groups, such as barriers

to participation and measures of hardship, it is not designed to identify communities that may be disproportionately impacted by a lack of access to natural gas.

The IOUs will also explore and utilize, as appropriate, other promising sources of third party data in the Plan, including:

- Purchased propane sales data
- County assessor office records
- Any additional promising sources of data

D. Data Elements to be Collected

The IOUs will gather data on the following data elements. The IOUs will consult with the Data Plan Working Group to review the level of technical detail required for various data elements. The Data Plan contractor's Work Plan will specify the level of technical detail required for various data elements.

Table 1:

Current Energy Source	Current Energy Costs
<ul style="list-style-type: none"> - Home heating - Water heating - Home cooling - Cooking - Clothes drying - Insulation 	<ul style="list-style-type: none"> - Propane - Wood - Electricity - Other fuel type (specify)
Attributes of Home	Demographics
<ul style="list-style-type: none"> - Rent/own - Age of home - Type of home - Home internal characteristics - Roof characteristics - Square footage 	<ul style="list-style-type: none"> - Household income - Address or census block - Household size - Bill transiency/tenancy - Age of tenants - Disabilities
Household Data	Demographic Data
<ul style="list-style-type: none"> - Address - Landlord contact info, if rented - Construction type - Build date - Square footage - Bedrooms - Bathrooms - Number of occupants 	<ul style="list-style-type: none"> - On all electric rate - On CARE rate - On FERA rate - On Medical Baseline rate - Qualified for Medical Baseline rate - Number of occupants - Number of occupants aged 65 or

<ul style="list-style-type: none"> - ESA remediated date - ESA program measures installed - ESA program measures not installed - Thermostat type - Has attic insulation - Space heater type - Cooler type - Propane pipe condition - Propane line underground - Electrical panel size/ condition - Electric wiring type - Electric wiring condition - Electric code issues - Plumbing system conditions - Asbestos (present or likely present?) - General housing code issues that may be triggered by fuel switching - Condition of housing envelop 	<ul style="list-style-type: none"> - older - Email address - Internet access at home - Internet access on mobile - Uses Facebook - Uses Twitter - Uses Nextdoor
Pilot and Program Awareness	Energy Awareness
<ul style="list-style-type: none"> - Awareness of the San Joaquin Valley Proceeding (R.15-03-010) - Awareness or participation in low income programs - Perceived burden of energy costs - Perceived reliability of energy source - Awareness of community based organizations (CBOs) 	<ul style="list-style-type: none"> - Effective energy saving practices - Real and perceived challenges with paying energy bills
Resiliency and Quality of Energy Services	Additional Non-Energy Benefits:
<ul style="list-style-type: none"> - Number of times per year resident lacks access to wood or propane - Duration of lack of access to wood or propane - Outages per year - Duration of outages - Overall customer satisfaction 	<ul style="list-style-type: none"> - Safety to the community and homes - Health, comfort and quality of life benefits - Workforce development and career enhancement - Criteria air pollutants reduced - GHG's reduced - Public health, both inside the residence and in the community

Community Issues	Cost data
<ul style="list-style-type: none"> - Community capacity and interest (ex. experience with community outreach related to energy solutions, effective outreach methods). - Community preference for an energy solution - Pending underground trenching activities (only if agreed and as prioritized with the Data Plan Working Group)⁴ 	<ul style="list-style-type: none"> - Equipment and installation costs (to refine utility estimates)
Additional Household Data	Customer Experience
<ul style="list-style-type: none"> - Customers' current usage levels for each household energy source (propane, wood, electricity and other fuel, to support estimating the share of local pollution generated by household sources) - Estimates of customers eligible but not participating in existing low-income programs, and interest in enrolling in low-income programs 	<ul style="list-style-type: none"> - Customer preferences for energy solution - Customer energy needs and perceived energy or air quality challenges (such as difficulty affording energy costs and in-home temperature comfort and air quality)

III. IMPLEMENTATION

The following section focuses on the key implementation details to carry out the Data Gathering Plan, particularly with regard to the collection of customer-originated data.

A. Statewide Coordination

Statewide Data Gathering Plan Consultant

The IOUs will, as soon as possible, retain a single statewide consultant to implement the Data Gathering Plan. Having a single consultant will ensure that the Data

⁴ Please obtain information accessible from local county offices and the State Water Resources Control Board.

Gathering Plan is implemented consistently across all identified San Joaquin Valley DACs. The consultant will be hired through a competitive bidding process managed by the IOUs with CPUC oversight, with the following process elements:

- PG&E will serve as the Responsible Party to oversee the RFP process, contracting, and general consultant oversight;
- Energy Division staff will oversee the IOUs' contracting process and PG&E will provide the draft RFP including scope of work to Energy Division staff for review and approval;
- PG&E will require winning RFP bidders to demonstrate substantial knowledge of, with a preference for actual experience in, the San Joaquin Valley, to describe how they will implement the Plan in a language and culturally appropriate manner, and to describe how they will reach hard-to-reach populations;
- PG&E will include in the RFP scope of work the task of creating simple mechanisms such as paper forms or tablets to allow implementers of pilot projects approved in Track A of R.15-03-010 to record relevant data for use in the Plan.

The selected statewide consultant will be responsible for:

- Drafting a Work Plan
- Drafting a sampling plan
- Drafting the survey instrument and administering the survey
- Processing and summarizing the data.
- Additional deliverables indicated below

The consultant will coordinate with local stakeholders and appropriate community representatives to incorporate community feedback. Specifically, the consultant will:

- Consult with residents, community-based organizations and community liaisons in the design of data gathering materials and approaches;
- Undertake robust, continuous community outreach;
- Work closely with parties, community-based organizations and community liaisons to establish trust within the identified communities.

Data Gathering Plan Working Group (Advisory)

The IOUs will establish an advisory Data Plan Working Group to support Plan implementation. PG&E will lead work to establish the Working Group, will manage all Working Group logistical and administrative functions, and will co-chair the group with a ratepayer advocate and a community-based organization (CBO). In this capacity, PG&E will:

- Work with parties to this proceeding to determine the make-up of the Data Plan Working Group and shall ensure that it appropriately includes meaningful participation by community-based organizations or community leaders from San Joaquin Valley disadvantaged communities; .

- Solicit input on the RFP scope of work for the Plan contractor from Working Group members, parties and others in a publicly noticed meeting;

- Discuss its proposed iterative or phased Data Gathering Plan approach and refine as necessary;

Make available draft Plan contractor deliverables to Working Group members for review and comment prior to their release, including the draft contractor Work Plan, sampling plan and survey instrument.

The Data Plan Working Group will undertake to submit periodic reports to Energy Division staff on the work of the Plan contractor as feasible. In addition, individual members of the Working Group may, as desired, provide recommendations to the Plan contractor to improve performance.

B. Collecting Customer-Originated Data

In addition to identifying the types of information to be collected, Attachment C of the Scoping memo also lists a wide range of data collection methods. In particular, it notes that data can be collected through both surveys and in-person visits. The IOUs support the use of surveys, but recommend limiting the number of in-home visits in all of the identified San Joaquin Valley (SJV) DACs because of the significant costs. Collecting data through in-home visits with all households in the SJV DACs would require sending qualified contractors to each individual home, significantly increasing labor costs. The Plan may require the use of formal, professional energy audits to identify household conditions that may impact equipment installation requirements and needed equipment improvements and to produce cost estimates for these requirements and improvements for a representative sample of the households.

A strategy involving web or direct mail surveys, with follow-up reminders by phone, email, or postcard, will likely be sufficient to obtain the desired information. As mentioned above, Working Group members and the Plan consultant should agree to what level of technical detail is necessary in collecting this information (e.g. identifying exact makes and models of A/C equipment) and whether that level of information can be reasonably obtained directly from residents through web and direct mail surveys. Information that cannot be obtained from surveys may require follow-up in-person visits. PG&E and the Plan consultant will use phone, internet and paper surveys when feasible and will employ in-house or group interview methods whenever other methods do not yield sufficient response.

There is precedence for relying on self-reported survey data to obtain detailed information on residential household characteristics. One example is the California Energy Commission's Residential Appliance Saturation Survey (RASS), which asks residents the same detailed information listed above, with the possible exception of home internal electrical conditions. The data obtained through the RASS is highly regarded in the industry as a source of quality information about household characteristics and is conducted through direct mail surveys.

Coordination with Potential Track A Pilot Projects

Track A of R. 15-03-010 is considering approval of pilot projects in up to twelve communities of the identified SJV DACs. To minimize confusion and duplication, PG&E and the Plan contractor will:

- Monitor Commission action on potential Track A pilot projects and endeavor to integrate Track A pilot project implementers into Plan data collection processes, where feasible, in the relevant communities where each implementer is operating.

Updated List of San Joaquin Valley Disadvantaged Communities

When scoping the Work Plan and sample design, PG&E and the Plan contractor will: (a) utilize the list of 170 San Joaquin Valley disadvantaged communities approved in D.17-05-014; and (b) the communities consisting of:

Alkali Flats, Earlimart Trico Acres, Five Points, Hardwick, Hypericum (Dog Town), Madonna, Perry Colony (The Grove), Ripperdan, Ballico, Cowan Tract, Del Rio, Lemon Cove CDP and Monterey Park Tract.

The Plan will endeavor gather information to determine if 25 percent of the residents of the communities of Ballico, Cowan Tract, Del Rio, and Lemon Cove CDP are CARE-eligible but not enrolled and shall more generally work to ensure that the Plan improves data on San Joaquin Valley DAC residents' eligibility to and access to IOU natural gas and/or electric services, including in communities where a majority of residents appear to be served by municipal electric or gas utilities.

C. Survey Sample Design

The Plan will generally obtain data from a sample of customers instead of aiming to complete a census among all customers in all of the San Joaquin Valley disadvantaged communities. Attempting to obtain data from all customers will yield a greater level of precision than is necessary to inform policy. Instead, PG&E will group communities according to like characteristics, and when it is reasonable to do

so, develop a sampling plan from which a subset of customers can be surveyed and generalized insights can be derived. The sample design will outline methods to ensure valid statistical analyses of key subgroups based on key factors such as current home energy sources, type of home, household income level, household size and tenancy or ownership status and will ensure sufficient attention to barriers posed to households occupied by renters. The Plan consultant will collaborate with the Data Gathering Plan Working Group to assess the benefits of additions or refinements to grouping criteria based on initial Plan or Track A pilot project data collection and analysis.

PG&E will emphasize data gathering from households in each community that currently lack natural gas or are on an all-electric rate when developing Plan grouping and sampling approaches and will consider all feasible options to ensure robust data collection from these customers. PG&E and the Plan consultant will strive to minimize data collection costs as feasible while ensuring the usefulness and validity of results. The DACs will be grouped using a two-stage process, first grouping DACs according to their access to natural gas infrastructure, and then second (for those DACs with widespread access to natural gas), grouping the communities according to their population size.

An initial grouping by natural gas access is consistent with the comments made by the Commission in D. 17-05-014. In this decision, the Commission noted that “in Phase II, the Commission may consider grouping communities based on natural gas service levels, as we conduct a more in-depth assessment and development of energy options for eligible communities.” Grouping communities first by their access to natural gas infrastructure would help divide the DAC population into two distinct groups, each with fundamentally different baseline energy conditions and potential energy solutions. Communities lacking access to natural gas are more likely to rely on alternate energy sources like propane or wood. Additionally, these communities, by virtue of their lacking natural gas infrastructure, should be considered eligible for a wider range of assistance programs, including natural gas extension or electrification. The sampling plan grouping approach will emphasize households lacking access to natural gas and households on an all-electric rate. In addition, P&GE and the Data Plan Working Group will discuss community-wide data that may be relevant to collect and shall include this in Plan as relevant, including, for instance, information on average energy bills for households neighboring those without access to natural gas.

The Plan will classify communities according to their access to natural gas. Specifically, communities with 90% gas service or higher will be defined as having “high” rates of gas access and populations with less than 90% gas service will be defined as having “low” rates of access. This proposed criterion is only meant to inform the data gathering process. The purpose of this delineation is to identify

communities that have relatively low rates of gas in order to study them in greater detail, potentially through survey efforts aimed at obtaining maximum response rates, rather than just a sample.

Communities deemed to have relatively high rates of gas access can also exhibit a wide range of demographic characteristics. Thus there would be value in further dividing these communities into subpopulations. These communities will be divided by population size, specifically between small DACs (1,000 households or fewer), medium DACs (1,001 to 10,000 households), and large DACs (10,001 households or more). The basis for this is that small and large communities can vary significantly in terms of their access to infrastructure and services, and in turn they may have distinct energy needs and may benefit from a different suite of energy programs. Developing a sampling plan with these groupings in mind will ensure that enough customers from each of these communities are surveyed to generate insights specific to these community types.

These proposed criteria thus yield four distinct DAC segments:

- Large-sized communities served by natural gas
- Medium-sized communities served by natural gas
- Small-sized communities served by natural gas
- All communities not served or minimally served by natural gas

D. Other Survey Considerations

The Data Gathering Plan will assume several stages of survey outreach. This will allow the contractor to monitor response rates and adjust follow-up plans accordingly, whether that means targeting follow-ups to boost response rates in general or trying to boost response rates within specific underrepresented sub-segments.

Plan survey and interview instruments and activities will be designed to raise awareness about existing low-income programs and to enroll interested customers, to the extent feasible.

PG&E may provide participation incentives, travel stipends, per diems and other means to financially support SJV DAC residents and community liaisons for their participation in the Plan, as determined appropriate. PG&E will work with the Data Plan Working Group to develop and refine these financial support methods as needed.

IV. DELIVERABLES, REPORTING AND ANALYSIS

The Commission has stated that the information obtained from the Track B Data Gathering effort will enable the Commission to perform an economic feasibility analysis in Phase III of this proceeding. Therefore the Plan consultant will be tasked with providing a comprehensive report summarizing the information obtained from the entire data gathering effort.⁵

The consultant should provide all information necessary to establish a baseline of energy conditions, which is necessary to conduct the economic feasibility analysis. To meet this requirement, the consultant should, at a minimum, provide a report containing summary statistics for each survey question, reported out by the four DAC groupings above, and potentially even at the level of each individual DAC, with the appropriate anonymization controls applied to comply with customer confidentiality restrictions.

The consultant will also be responsible for using certain data collected during the survey fielding, such as data on costs of propane and wood fuel, to quantify the energy burdens faced by DACs. This will streamline the process of turning the raw data gathered from this initiative into a more quantitative set of baseline conditions that could be used in the evaluation of the benefits of potential energy options.

The Consultant will provide a memorandum on initial findings and will present this at a workshop in order to receive community input and feedback prior to developing the final report.

The consultant will provide a database containing collected information and a user guide to the database to the parties to R.15-03-010 and the Commission. In doing so, PG&E and the consultant will ensure aggregation and anonymization of all data and results in a manner that excludes or masks all customer-specific data and any commercially-sensitive proprietary information and that complies with relevant state and federal laws and all Commission customer privacy decisions, including D.06-06-066 and Appendices; D.11-07-056 and Appendices; D.14-05-016; and, D.16-08-024.

PG&E, SCE and SoCalGas will also develop and make available a short Joint Data Confidentiality Protection Strategy to residents contacted as part of the Data Gathering Plan, parties and community-based organizations.

⁵ Updated excel and PDF versions of the D.17-05-014 database summarizing current information on the list of SJV DAC communities will be included in the final Plan report.

V. PROPOSED DATA GATHERING TIMELINE

The Data Gathering Plan timeline is set forth below.

Task	Timeframe
Scoping and Contracting	Approximately 7 months
Commission Decision	Sometime in 2018
Kickoff Meeting	Within 10 business days
<i>Data Plan Working Group</i>	<i>Within six weeks</i>
Develop Request for Proposal (RFP) Statement of Work (SOW)	2 months
Develop RFP Scorecard	
RFP Process	1 month
Score RFP Bids	3 weeks
Contract with Vendor	3 months
Study Timeframe	Approximately 7.5 months
Study Kickoff Meeting	Within 10 business days
<i>Working Group</i> Check-In Meetings	Ongoing
Develop <i>Work Plan</i> and Survey Instruments	1 month
Data Request to IOUs	3 months, concurrent with <i>Work Plan</i> , sample design/survey instrument development tasks
Data Collection/Fieldwork	4 months
Data Cleaning and Validation	
Reporting	3.5 months
Summary Results	1 month
Draft report to Working Group and CPUC	1 month
Data Gathering Workshop	10 business days
Final Report to Working Group and CPUC	1 month
Total	18.25 months

VI. COST RECOVERY

PG&E, SCE and SoCalGas will recover Data Gathering Plan costs from their Public Purpose Program charges.

(End of Attachment A)