**ATTACHMENT B** 

(WITH TRACK CHANGES)

SAN JOAQUIN VALLEY

# **DISADVANTAGED COMMUNITIES**

PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 G) PROPOSED-DATA GATHERING PLAN

R.15-03-010

AugustFebruary 28, 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.<sup>₫</sup>

This Statewide Data Gathering Plan provides a proposed framework for capturing information on the identified San Joaquin Valley Disadvantaged Communities 170 DACs identified in Phase I. 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.  $\frac{4}{2}$  The Data Gathering Plan is presented in five sections:

- 1. 1. Data Gathering Needs and Data Elements,
- 2. 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

<sup>&</sup>lt;sup>1</sup> "Assigned Commissioner's Scoping Memorandum and Ruling," R. 15-03-010, p. 3 (December 6, 2017) ("Scoping Memo").

Phase II of the proceeding will need to include all information necessary to address each of these considerations." <sup>5</sup> 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 recommends an iterative approach. PG&E will design supports 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 supports 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 tFrom here, the Working Group and -parties to Commission and parties should assess whether the data collected up to that time to date 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. TPG&E believes this data is best obtained directly from the customer, as the IOUs and third parties may not have direct access to this information.

TIn particular, PG&E believes that the following categories of information defined in Attachment C of the Scoping Memo<sup>2</sup>  $\frac{6}{2}$  are best obtained directly from customers:

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

Home heating Water heating Home cooling Cooking Clothes drying Insulation

<sup>2</sup> 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

Current energy costs (annual and seasonal) Propane Wood Electricity<sup>3</sup> ity<sup>7</sup> 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,<del>, PG&E recommends</del> the following additional topics should be for-consideredation:

- —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 PG&E discusses its proposal 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) E's-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 -would not be able to-release confidential information for limited use until appropriate nondisclosure agreements are in place, and will the Commission would have to ensure specific safeguards are in place before any the proper disclosure of utility, customer-identifying or -other-commerciallysensitive -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 PG&E supports a discussion between the IOUs and stakeholders to-identify the he-range of energy options that would be most feasible for each DAC.

The IOUs have PG&E has-provided an overview of potentially relevant energy efficiency programs in theirits February 15, 2018 filings in R.15-03-010. , "Pacific Gas and Electric Company's (U 39 G) Responses to Requests for Supplemental Information." In theirits filings the IOUs , PG&E provides 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 PG&E-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:
  - o Bill payment behavior
  - o Household makeups
  - o 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 which-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	
-	Home heating	-	Propane
-	Water heating	-	Wood
-	Home cooling	-	Electricity
-	Cooking	-	Other fuel type (specify)
-	Clothes drying		
-	Insulation		
Attributes of Home		Demographics	
-	Rent / own	-	Household income
-	Age of home	-	Address or census block
-	Type of home	-	Household size
-	Home internal characteristics	-	Bill transiency/tenancy
-	Roof characteristics	-	Age of tenants
-	Square footage	-	Disabilities
Household Data		Demographic Data	
-	Address	-	On all electric rate
-	Landlord contact info, if rented	-	On CARE rate
-	Construction type	-	On FERA rate
-	Build date	-	On Medical Baseline rate
-	Square footage	-	Qualified for Medical Baseline rate
-	Bedrooms	-	Number of occupants
-	Bathrooms	-	Number of occupants aged 65 or
-	Number of occupants		older
-	ESA remediated date	-	Email address
-	ESA program measures installed	-	Internet access at home
-	ESA program measures not installed	-	Internet access on mobile
-	Thermostat type	-	Uses Facebook
-	Has attic insulation	-	Uses Twitter
-	Space heater type	-	Uses Nextdoor
-	Cooler type		
-	Propane pipe condition		
-	Propane line underground		

-	Electrical panel size/ condition		
-	Electric wiring type		
-	Electric wiring condition		
-	Electric code issues		
Pilot and Program Awareness		Energy	/ Awareness
-	Awareness of the San Joaquin Valley	-	Effective energy saving practices
	Proceeding (R.15-03-010)	-	Real and perceived challenges with
-	Awareness or participation in low		paying energy bills
	income programs		
-	Perceived burden of energy costs		
-	Perceived reliability of energy source		
-	Awareness of community based		
	organizations (CBOs)		
Resiliency and Quality of Energy Services		Additional Non-Energy Benefits:	
-	Number of times per year resident	-	Safety to the community and homes
	lacks access to wood or propane	-	Health, comfort and quality of life
-	Duration of lack of access to wood or		benefits
	propane	-	Workforce development and career
-	Outages per year		enhancement
-	Duration of outages	-	Criteria air pollutants reduced
-	Overall customer satisfaction	-	GHG's reduced
		-	Public health, both inside the
			residence and in the community
Community Issues		Cost data	
-	Community capacity and interest (ex.	-	Equipment and installation costs (to
	experience with community		refine utility estimates)
	outreach related to energy solutions,		
	effective outreach methods).		
-	Community preference for an energy		
A .	solution	Custor	
Additi	Customers' current usage lovels for	Custor	ner Experience
-	customers current usage levels for	-	customer preferences for energy
	(propage wood electricity and other		Solution
	(propane, wood, electricity and other	-	customer energy needs and
	of local pollution generated by		challenges (such as difficulty
	bousehold sources)		affording operate costs and in home
	Estimatos of customors oligible but		tomporature comfort and air quality)
-	estimates of customers eligible but		temperature connort and air quality)
	income programs, and interact in		
	oprolling in low income programs		
	enrolling in low-income programs		

### 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, PG&E supports retaining a single statewide consultant to implement the Data Gathering Plan. Having a single consultant will would ensure that the Data Gathering Plan is implemented consistently across all identified San Joaquin Valley 170-DACs. The consultant will be<sub>7</sub> 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 and experience in the San Joaquin Valley, to describe how they will implement the Plan in a language and culturally <u>and energy literacy</u> 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.;

7

The selected statewide consultant will ould 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 should-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)

<del>1.</del>

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 or non-profit group. 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; for this proceeding.

• Solicit input on the RFP sScope of wWork 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.

In order to facilitate a statewide contract, one utility will be chosen as the Responsible Party to oversee the RFP process, contracting, and general consultant oversight.

# 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 PG&E-supports the use of surveys, but recommend s-limiting the number of in-home visits in all of the identified San Joaquin Valley (SJV) -170-DACs because of the significant costs. Collecting data through in-home visits with all households in the SJV e 170-DACs would require sending qualified contractors to each individual home, significantly increasing labor costs.

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 Stakeholders-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: -supplemented with additional SVJ DACs approved in Phase II of R.15 03 010, including:

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

The Plan(Plan) will endeavor -is sufficient to gather information to determine if 25 percent% of the residents of the communities of Ballico, Cowan Tract, Del Rio, and Lemon Cove CDP and Monterey Park Tract 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

PG&E recommends obtaining data from a sample of customers instead of aiming to complete a census among all customers in all of the San Joaquin Valley <u>e 170</u> 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 proposes to 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.

2. 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 PG&E recommends grouping 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. <sup>§</sup>-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.<sup>§</sup>-." PG&E-agrees with this recommendation. 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.

CWhen classifying communities as having widespread access to natural gas will have , PG&E recommends setting a high bar. Specifically, PG&E recommends that 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. TPG&E notes that 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. TPG&E recommends dividing 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 i recommendation 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 would 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

TPG&E recommends 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.

#### 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 PG&E recommends that the consultant will be tasked with providing a comprehensive report summarizing the information obtained from the entire data gathering effort.

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 PG&E also recommends that 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 ould 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 be asked to 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 be asked to provide a database containing collected information and a user guide to the database that will be provided 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 all-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.

### 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			
Data Plan Working Group	Within six weeks			
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			
Working Group Check-In Meetings	Ongoing			
Develop Work Plan and Survey Instruments	1 month			
Data Request to IOUs	3 months, concurrent with Work Plan, 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				

PG&E worked with the other IOUs to develop a proposed Data Gathering Timeline. The timing below is consistent with the Commission's statement in the Scoping Memorandum that "Phase II of this proceeding is anticipated to be concluded no later than 24 months from the date of this Scoping Memorandum."<sup>4</sup>

# VI. COST RECOVERY

—PG&E, SCE and SoCalGas will recover Data Gathering Plan costs, not exceeding \$1 million in total, from their Public Purpose Program charges.

In its January 31, 2018 filing, PG&E requested costs recovery for costs associated with its pilot proposals. <u>11</u> PG&E similarly requests cost recovery for its Data Gathering efforts prior to the utility incurring those costs. To the extent data gathering efforts are associated with gas pilot proposals, then the cost should be recovered in the Core Fixed Cost Account and Noncore

<sup>4</sup> Scoping Memo, p. 13.

Customer Class Chare Account.<sup>12</sup> To the extent data gathering efforts are associated with electrification pilot proposals, then those costs should be attributed to the Distribution Revenue Adjustment Mechanism (DRAM).<sup>13</sup> As this proceeding continues, PG&E is open to the alternative options regarding the appropriate cost recovery mechanism.