BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Approval of Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for 2021-2026 Program Years.

Application No. 19-11-003 (Filed November 4, 2019)

U 39 M

And Related Matters.

Application 19-11-004 Application 19-11-005 Application 19-11-007

PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M) RESPONSE TO ASSIGNED COMMISSIONER'S RULING OF JUNE 15, 2020 AND SUPPLEMENTAL TESTIMONY

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Dated: September 4, 2020

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PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M) RESPONSE TO ASSIGNED COMMISSIONER'S RULING OF JUNE 15, 2020 AND SUPPLEMENTAL TESTIMONY

Pacific Gas and Electric Company (PG&E) submits its supplemental testimony pursuant to the *Assigned Commissioner's Ruling in Response to May 22, 2020 All-Party Meeting on California Alternate Rates for Energy Outreach in Light of COVID* (COVID-19 Ruling) of June 15, 2020. The Ruling Questions directs parties "to file and serve responses to the following questions in their testimony in the consolidated Application (A.) 19-11-003 et al. proceeding." See Attachment A-PG&E's Supplemental Testimony which includes:

- PG&E's response to the two COVID-19 Ruling questions,
- Removal of PG&E's the Long-Term CARE Pilot from consideration in PG&E's
 Prepared Testimony; and
- Clarifies coordination of auditing and post-installation quality assurance for
 Energy Savings Assistance Program In-unit and common area measure(s) efforts.

<u>1</u> /	Ruling, p. 3.	

Respectfully Submitted,

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Dated: September 4, 2020 PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT A

Application: <u>ˈ</u>	19-11-003
(U 39 M)	
Exhibit No.: _	
Date: Septer	nber 4, 2020
Witness(es):	Lori Leiva Jungbluth
, ,	Erik Olsen
	Neil Singh

PACIFIC GAS AND ELECTRIC COMPANY

ENERGY SAVINGS ASSISTANCE (ESA), CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE) AND FAMILY ELECTRIC RATE ASSISTANCE (FERA) PROGRAMS AND BUDGETS APPLICATION FOR THE 2021-2026 PROGRAM YEARS (PYS)

SUPPLEMENTAL TESTIMONY



PACIFIC GAS AND ELECTRIC COMPANY ENERGY SAVINGS ASSISTANCE (ESA), CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE) AND FAMILY ELECTRIC RATE ASSISTANCE (FERA) PROGRAMS AND BUDGETS APPLICATION FOR THE 2021-2026 PROGRAM YEARS (PYS) SUPPLEMENTAL TESTIMONY

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PACIFIC GAS AND ELECTRIC COMPANY ENERGY SAVINGS ASSISTANCE (ESA), CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE) AND FAMILY ELECTRIC RATE ASSISTANCE (FERA) PROGRAMS AND BUDGETS APPLICATION FOR THE 2021-2026 PROGRAM YEARS (PYS) SUPPLEMENTAL TESTIMONY

A. Introduction

 Pacific Gas and Electric Company (PG&E) presents its Supplemental Testimony in response to: (1) Assigned Commissioner's Ruling in Response to May 22, 2020 all-party meeting on California Alternate Rates for Energy (CARE) Outreach in Light of COVID-19 (Ruling), 1(2) to remove the Long-Term CARE (LTC) Pilot from consideration in PG&E's Prepared Testimony; and (3) to submit information on coordination of auditing and post-installation quality assurance for Energy Savings Assistance (ESA) Program In-unit and common area measures (CAM) efforts.

1. COVID-19 Response

On May 22, 2020, to better understand the CARE program's current education and outreach efforts during the COVID-19 pandemic, the Commission held an all-party meeting. As stated in the Ruling, "The purpose of the meeting was to gain a better understanding of the many utility efforts underway to increase CARE and Family Electric Rate Assistance (FERA) education and outreach during the pandemic, and to consider whether additional actions would be beneficial."²

Based on party discussion, the Ruling directs parties to file and serve responses to questions in their testimony in the consolidated Application (A.) 19-11-003 et al. proceeding. See Section B for PG&E's responses to the Ruling's questions below.

2. Supplement to Prepared Direct Testimony

PG&E also includes a supplement to its Prepared Direct Testimony to (1) remove the LTC Pilot from consideration in PG&E's Prepared Testimony;

¹ Assigned Commissioner's Ruling in Response to May 22, 2020 all-party meeting on CARE Outreach in Light of COVID-19, June 15, 2020.

Ruling, p. 2.

and (2) submit information on coordination of auditing and post-installation quality assurance for ESA Program In-unit and CAM efforts. PG&E discussed both this change and clarification during the Spring 2020 workshops in this proceeding.

B. Questions From the June 15, 2020 Ruling

1. What Best Practices Can Be Implemented to Support Community-Based Organization Capitation Work to Result in More CARE and FERA Enrollments, Including in Populations Newly Eligible for the Programs Due to COVID-19? [Witness: Neil Singh]

The COVID-19 pandemic presents new circumstances at a magnitude never experienced before. Since the impact of COVID-19, PG&E began expanding current practices to reach those newly eligible for programs. Since PG&E already has a high CARE penetration rate, PG&E did not witness a high number of enrollments from the newly eligible population as it expected through its Community Based Organization's (CBO). PG&E believes one reason customers may not have enrolled in CARE or FERA is because of the Federal government's \$600 additional increase per week for unemployment benefits. PG&E anticipates that when the additional unemployment benefit expires, more customers may enroll in CARE or FERA.

PG&E already employs the following practices, which have been successful in the past and gleaned from national income qualified segment forums and webinars:³

• PG&E increased strategies to leverage CBO networks that serve impacted local communities. These strategies include leveraging CBOs that remain open and actively engage in providing critical support for newly unemployed workers and families, such as local food banks and food pantries, to distribute CARE/FERA applications and flyers in Spanish and English. PG&E also provided weatherproof CARE/FERA posters in English and Spanish for CBOs to display. The posters include information regarding the online CARE/FERA application.

PG&E is a member of the Utility Customer Research Consortium where it obtains research data and best practices from other utilities across the country.

Therefore, while waiting in line for service at places like food banks and pantries, customer can refer to the posters and apply for PG&E's income qualified programs.

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- PG&E reached out to faith-based organizations, school districts and child-care centers already serving income qualified customers, to increase awareness about CARE/FERA and other similar programs. These strategies emphasized community support programs where newly eligible customers are likely to seek immediate assistance as several of the traditional partners were either providing remote support or significantly limited due to the shelter in place orders.
- PG&E initiated efforts to expand the CARE Outreach Contractors (COC)
 network by sending invitations to all Low Income Home Energy
 Assistance Program and Tribal Temporary Assistance for Needy
 Families providers who were not participating in the program.
- Regardless of COVID-19, PG&E continues to analyze zip codes without COCs that have high unemployment and penetration of 80 percent or lower for CARE or FERA. PG&E is actively recruiting new partners for this program or new partnerships where the COC model may not be the right approach.

75 percent of the new enrollments for CARE and 88 percent for FERA, have been through digital channels. Digital channels remain the preferred channel of choice for newly eligible customers. Finally, updated eligibility estimates from Athens Research are expected in September. These updated eligibility estimates are expected to include populations newly eligible due to COVID-19.

PG&E (U39M) Comments to Administrative Law Judge's Ruling, Attachment A, PG&E Ruling Questions on the Energy Division Staff Proposal, p. 47. Question 33. Filed July 24, 2020.

2. How Does Your Utility Track and Evaluate the Effectiveness of Its Various Care Education and Outreach Channels, and How Is This Information Incorporated Into The Overall Education and Outreach Strategy? [Witness: Erik Olsen]

 PG&E tracks and evaluates the effectiveness of its various CARE education and outreach channels based on customer engagement and program performance, which is measured by program applications and enrollment or penetration rate. PG&E's strategic marketing focus and continuous improvement efforts over many years resulted in a participation rate for the CARE Program of 105.1 percent as of July 31, 2020. PG&E anticipates this penetration rate will likely be impacted when the new Athens Research data is received, and adjustments to the estimated eligible customer population are made.

In 2018, CARE marketing helped drive a total of 239,000 new enrollments in the program. For 2019, PG&E marketing of the CARE Program contributed more than 234,000 new enrollments. During the program cycle 2017-2020, marketing evolved—placing greater emphasis on data-driven decision making and using a test-and-learn approach to deliver more effective acquisition strategies and tactics.

While PG&E believes it is important to focus on overall performance and achieving or exceeding the CARE program goals for penetration, PG&E also focuses on identifying and targeting markets with lower penetration and using a variety of strategies to drive engagement and enrollment with hard to reach audiences.

a. Multi-Channel, Multi-Touch Strategy

PG&E's multi-channel, multi-touch strategy has led to successful campaigns that exceeded the 90 percent aspirational target for the past two years and, despite challenges related to the COVID-19 pandemic, is on pace to do so again in 2020. Multi-channel marketing benefits customers by making it easier for customers to engage, such as signing up for CARE, in whatever channel they are using or comfortable with. Multi-channel marketing provides customers with a choice. Multi-

⁵ ESA and CARE Program Monthly Report for July 2020.

channel marketing also allows for repetition, which is important because the more people hear/see a message, the more familiar it becomes. For some consumers, it takes hearing a message multiple times before they act. Through testing, PG&E has found that it can take at least 3-5 messages for some customers to engage.

PG&E uses a combination of direct mail and email to co-promote CARE and FERA. An "always on" digital advertising strategy complements direct marketing campaigns to increase awareness, provide reminder messaging, and support new customer enrollments. The use of broadcast and traffic radio campaigns provide an additional layer of media, again to drive awareness and enrollment. The sum of the parts is more important than any individual tactic.

PG&E leverages the combined strength of complementary marketing and outreach to communicate multiple times and in different channels. PG&E continuously tracks and evaluates performance by tactic and waves of marketing in order to optimize campaign performance.

In the following section, campaign activities are grouped under the headings of Acquisition, Retention, and Outreach and Integrated Communications to explain how various CARE marketing channels are tracked and evaluated, and how those results are incorporated into overall strategy.

b. Acquisition

PG&E's acquisition activities focus on targeting newly eligible and eligible customers that have not responded to prior marketing. These efforts include:

 Media and online advertising – PG&E's current CARE media campaign is composed of numerous components such as, online display advertising, email advertising, search marketing, and native advertising.⁷ PG&E currently meets with media and advertising

Frequency and sequence testing results, 2015 CARE End of Season analysis, Executive Summary, p.4, prepared by Targetbase, November 16, 2015.

⁷ Native Advertising is online advertising which appears in contextually relevant and targeted locations.

agency partners on a weekly basis to evaluate the effectiveness of campaign and creative performance. PG&E uses the following metrics to optimize media plans and identify opportunities to increase or decrease media investments based on performance.

- "Impressions" are the number of times an ad is shown or displayed. It represents the number of users who were exposed to the message (whether once or multiple times).

 Subsequently, the percentage of impressions seen/exposed are also monitored and optimized through a 3rd party brand safety partner in order to provide quality impressions. Impressions give us the ability to benchmark the campaign results by media type (i.e., how many impressions for digital display banner ads, how many impressions for radio commercials etc.) to compare to each other, by month, by quarter, by campaign and year-over-year.
- "Clicks" are the number of times an ad is clicked on by a user to access content related to the Program being promoted and a measurement of digital creative engagement, to determine initial banner performance by creative execution.
- "Click-Through Rates" (CTR) indicate the impressions PG&E is reaching of an interested audience/or those interested in clicking to learn more about the CARE program. The higher the CTR the better: Clicks divided by Impressions equals CTR.
- "Unique CTR" is used to measure the effectiveness of specific creative versions as well as media channels.
- "Web page visits" count the number of times a user visits the CARE landing page or other designated page content after seeing or clicking on an ad. Repeat user visits and unique visitors are tracked. This provides a valuable measure for understanding if PG&E's ad is getting a response and getting customers to the page(s) where we can provide more information about the program.
- Completed application submissions and completed application rates are used to track conversion from interested to engaged.

- 1 Email and Direct Mail – These are key components of targeted 2 marketing campaigns and most often used to focus on customers 3 that are scored highly (most likely to be eligible and participate) 4 according to PG&E's CARE propensity model. Email allows for a 5 larger and more cost-efficient reach to bigger audiences, and direct mail is used to reach customers that have not opted in to receive 6 7 communications via email. Multi-touch direct mail and email 8 campaigns have a long-running history of success in driving CARE enrollments, and continue to be a primary acquisition tactic for 9 CARE. PG&E uses the following metrics to optimize direct mail and 10 11 email: 12 Direct mail distribution – measures awareness generated 13 through the reach of messages and number of customers 14 touched by campaign creative. 15 Direct mail response – measures the application submissions 16 and completed application rates are used to track conversion from interested to engaged. 17
 - Email clicks, CTR are tracked to measure customer engagement and actions taken.
 - Email unique open rate and CTR are used to measure the effectiveness of specific creative versions and subject lines.
 - Home delivered print tactics: PG&E tested zip-code targeted, home delivered communications (i.e., door hangers, Val Pak and Retail Me Not shared mail) in late 2019. Due to the results, PG&E has adopted and expanded zip-targeted efforts with more marketing tactics in 2020 to focus on areas with lower penetration, Hard-to-Reach (HTR) customers and those more likely to be impacted by recent unemployment. PG&E uses the following metrics to optimize home delivered print:
 - Distribution measures awareness generated through the reach of messages and number of customers touched by campaign creative.

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⁸ PG&E's Prepared Testimony, Ch. II, p. 30.

 Response – measures the application submissions and completed application rates are used to track conversion from interested to engaged and incremental increases in applications resulting from targeted campaigns.

c. Retention

 Prior to March 19, 2020, all CARE customers were subject to recertification and post-enrollment verification, referred to as Post Enrollment Verification (PEV). These activities were placed on hold due to the significant impact by the COVID-19 pandemic. However, when recertification and PEV activities resume, PG&E expects to use targeted approaches to encourage customers to recertify their eligibility for the program that may include:

- Auto-re-certification of customers in top deciles as identified by
 PG&E's CARE propensity model⁹ Customers in top deciles
 (deciles 1 & 2) are automatically re-certified and continue enrollment in the care program given their high likelihood of continued eligibility.
- Email and Direct Mail Similar to its use for acquisition of new customers. Direct Mail and targeted email can be used to reach customers nearing re-enrollment points, as well as to maintain ongoing engagement with customers. PG&E typically tracks reenrollment and attrition on a monthly basis, and these campaigns complement program-generated communications.
- CARE Welcome Kit Once a customer enrolls in CARE, they
 receive messages about the requirements for ongoing participation
 in the program via the CARE Welcome Kit. In 2019, PG&E
 analyzed the impact of the Welcome Kit on CARE customer
 retention. The analysis showed that the CARE Welcome Kit has
 had a positive impact on the overall retention of CARE customers.
 Of those customers who received the Welcome Kit, 43.9 percent

The current CARE Propensity Model was originally adopted in 2013 and enhanced in 2016 and 2019 to include additional data inputs. Both the original model and the enhanced versions were thoroughly vetted to confirm that customers selected from among high propensity model deciles are more likely to be eligible in CARE than randomly selected customers.

recertified for CARE versus a 37.2 percent recertification rate for customers who did not receive a Welcome Kit. Customers who received a Welcome Kit also had higher tenure on the CARE Program by three months compared to those that did not receive the communication.¹⁰

In addition to supporting CARE retention, the Welcome Kit has driven enrollment in other PG&E income qualified programs. For example, in 2018, PG&E added a prefilled ESA lead form and postage paid reply envelope to the direct mail version of the Welcome Kit to encourage new CARE customers to apply to participate in ESA. This communication drove more than 10,000 incremental leads for ESA. In addition to generating many ESA responses, customer leads from this CARE Welcome Kit had a higher assessment and treatment rate compared to other ESA outreach campaigns. 12

PG&E continues to provide all newly enrolled CARE customers a welcome kit.

d. Outreach and Integrated Communications

- Integrated communications Integrated messages in PG&E's digital residential newsletter provides messaging reach to a larger audience. PG&E uses the following metrics to optimize integrated messaging:
 - Clicks, CTR- tracked to measure customer engagement and actions taken.
 - CARE homepage visits tracked to measure customer engagement and actions taken.
- <u>Community Based Outreach</u> outreach to HTR audiences. PG&E uses capitation, or a count of customers enrolled, to track CBO efforts.

Appendix E, CARE Welcome Kit Analysis, p. 5, prepared by Targetbase, August 19, 2019.

¹¹ ESA leads tracked via Edgeline and Webtrends, Q1-Q4, 2018.

ESA 2018 Campaign Analysis, prepared by Targetbase, May 15, 2019.

- <u>Public Relations (PR)</u> tactics drive added reach and awareness of financial assistance programs and can be targeted to regions with low enrollment. When media placements are successful, cost is minimal. PG&E monitors media placements and inclusion of messages as a measure of success for PR efforts.
- Outreach to Hard-to-Reach and People with Disabilities/Access and Functional Needs PG&E continues to support CARE customers with outreach materials in multiple languages and to provide disability and aging resources. All forms and brochures that include the CARE and FERA income guidelines will continue to be updated annually in compliance with Decision (D.) 12-08-044.¹³ Customers will find program applications in English, Spanish, Chinese, Vietnamese, and Large Print formats on pge.com and/or by calling PG&E's Customer Contact Center where a much larger language array is supported. Materials are translated into up to 17 languages and are also available at PG&E local offices and via CBOs. Braille applications are available by request through the Customer Care Contact Center.

3. Evaluation

PG&E evaluates strategies and tactics, and then optimizes based on lessons learned so that subsequent campaigns benefit. Rather than relying only on a year-end evaluation period, or one annual report on effectiveness, this approach encourages a nimble campaign evaluation and rapid tactical adjustment to optimize results for campaigns among Hard- to-Reach audiences and the (remaining) eligible customers who have not yet enrolled. PG&E also assesses campaigns on a holistic level to understand the effectiveness of multi-touch (frequency) and multi-channel (reach) marketing along the customer journey. This enables PG&E to efficiently adjust budgets towards best performing channels and tactics. Tracking campaign results against the program goals further determines the overall effectiveness of campaigns. PG&E's Prepared Testimony, Chapter II further

¹³ D.12-08-044, p. 409, Ordering Paragraph 119.

explains how this information will be incorporated into the overall education and outreach strategy for 2021-2026. 14

C. Removal of the LTC Pilot [Witness: Lori Leiva Jungbluth, Erik Olsen]

As of the date of filing PG&E's application, A.19-11-003, there were 271,597 customers who had been enrolled in CARE for 5 or more years consecutively and never participated in ESA. PG&E assumes these customers have been approached via outreach materials since all CARE customers are part of targeted ESA marketing efforts.

To effectively target this "long term" CARE population and mitigate the participation gap, PG&E is proposing a customer research project to replace the LTC Customer Pilot that was presented in its Application. This change was discussed and noted in the Low Income Programs Wrap-Up Workshop held on June 3, 2020. The new research project is expected to focus on marketing and outreach strategy, communications tactics and specific messaging to gain greater understanding into the barriers to participation. PG&E expects to uncover the issues and barriers to participation and then develop messaging based on research findings to overcome said barriers.

It is PG&E's intent to move the budget of \$275,000 associated with the original LTC Pilot into the Marketing and Outreach budget.

Within the new research project proposal, PG&E plans to send out a survey and possibly conduct interviews with the LTC customers to gather feedback specifically about what is preventing them from acting. Based on the results, marketing and outreach materials will be developed specifically for the targeted group and tested with PG&E's online customer panel and other channels as appropriate, prior to going out in market.

PG&E envisions the following steps as the new research project. A sample of the targeted population will be identified and segmented in two groups for the in-market test. Both groups will receive information about responding and participating in ESA. However, the first group will receive outreach communications that focuses on the customer's opportunity to enjoy the benefits

¹⁴ Prepared Testimony, Chapter II, p. II-70.

¹⁵ Prepared Testimony, Ch. I, p. I-11, Table I-4.

Appendix D, Long Term CARE Pilot.

of receiving no-cost energy saving products and services with free installation as part of the PG&E CARE program. The second group will receive outreach communications that focus on the economic impact of potentially missing out on the savings and benefits available with ESA. The results will help PG&E to develop the most effective messaging and outreach for getting this audience to respond. PG&E proposes leveraging existing touchpoints and established relationships with the targeted population during this test to promote the ESA program.

Responses from the two customer groups will be tracked while materials are in market and follow up phone calls will be planned with non-responders after the marketing and outreach efforts to gather feedback from the targeted customers. PG&E also expects to compare the actions and behaviors of the two test groups with a control group.

The marketing and outreach plan for the test groups would have multiple components, such as mailed materials, phone calls, digital communications and in person conversations, if possible. Marketing and outreach plans would also include multiple languages to best reach the targeted populations.

The project planning is expected to begin in late 2023 with implementation in 2024. The following table provides estimates of time and cost based on initial planning assumptions.

TABLE 1
RESEARCH PROJECT – ACTIVITIES, COSTS AND TIMING

Line No.	Activity	Est. Cost	Approx. Timing (Months)
1	Develop detailed research, test & learn plan	\$10,000	1
2	Develop customer survey/interview guide	10,000	1
3	Conduct research	20,000	1
4	Analyze data and prepare report	10,000	.5
5	Develop marketing materials and test in online customer panel	10,000	1.5
6	Develop marketing materials for outreach	50,000	3
7	Implement outreach communications – 15,000 customers ^(a)	125,000	8-12
8	Data Gathering and Tracking	15,000	8 – 12
9	Analyze Tracking and Response data	15,000	1
10	Prepare Report	10,000	1
11	Total	\$275,000	18 – 20

⁽a) Much of the forecasted cost is anticipated to be outreach and follow up with the participants.

Note: Cost for ESA measures are included in ESA budget request.

D. Submission of Information on Coordination of Auditing and Post-Installation Quality Assurance for ESA Program In-unit and CAM Efforts, (PG&E's Prepared Testimony, Chapter I, pp. I-144, Section D.8.a.ii) [Witness: Lori Leiva Jungbluth]

As for auditing and post-installation quality assurance, CAM and in-unit are done as separate workstreams, handled by the respective implementers and PG&E's own inspection team. Auditing for CAM is done by PG&E's CAM implementer to identify feasible measures and takes place before the project is committed. In-unit auditing or measure feasibility assessment is done by the ESA contractor once they have tenant permission. Both the CAM implementer and PG&E will do a quality check on a percentage of completed CAM projects. PG&E does the post-installation quality check on a percentage of the treated in-unit households.

E. Conclusion

PG&E respectfully submits answers to the questions from the All-Party Meeting on CARE for Commission consideration. In addition, PG&E removes the LTC Customer Pilot and replaces it with a marketing and outreach research project, including movement of funds into the Marketing and Outreach budget. PG&E also submits information on coordination of auditing and post-installation quality assurance for ESA Program In-unit and CAM efforts.