

Application: 24-09-014
(U 39 M)
Exhibit No.: (PG&E-3)
Date: August 7, 2026
Witness(es): Various

PACIFIC GAS AND ELECTRIC COMPANY
2023 GENERAL RATE CASE PHASE II
ERRATA TO JANUARY 23, 2026 ERRATA TESTIMONY
EXHIBIT (PG&E-3)
REVENUE ALLOCATION AND RATE DESIGN
(REDLINE VERSION)



PACIFIC GAS AND ELECTRIC COMPANY
2023 GENERAL RATE CASE PHASE II
EXHIBIT (PG&E-3)
REVENUE ALLOCATION AND RATE DESIGN
ERRATA TESTIMONY

TABLE OF CONTENTS

Chapter	Title	Witness
1	INTRODUCTION TO REVENUE ALLOCATION AND RATE DESIGN (NO CHANGE)	Benjamin Kolnowski
2	REVENUE ALLOCATION (NO CHANGE)	Tysen Streib
Attachment A	REQUIRED DISTRIBUTION AND GENERATION CHANGES FOR EACH YEAR OF THE TRANSITION PLAN (NO CHANGE)	Tysen Streib
Attachment B	RATE DESIGN GUIDELINES TO IMPLEMENT REVENUE REQUIREMENT CHANGES (NO CHANGE)	Tysen Streib
3	RESIDENTIAL RATE DESIGN (NO CHANGE)	Joseph Au Sarah Jin Colin Kerrigan Hugh Krogh-Freeman Annette Taylor Natalie Yang
4	COMMERCIAL AND INDUSTRIAL RATE DESIGN (NO CHANGE)	Thomas Yu
Attachment A	DETAILED GUIDELINES FOR CHANGING RATES FOR REVENUE CHANGES (NO CHANGE)	Thomas Yu
5	AGRICULTURAL RATE DESIGN (NO CHANGE)	Sarah Jin
6	STREETLIGHTING RATE DESIGN (NO CHANGE)	Paulina Pra
7	BUSINESS ELECTRIC VEHICLES RATE DESIGN (NO CHANGE)	Tysen Streib Oriana Tiell
8	THE ECONOMIC DEVELOPMENT RATE (NO CHANGE)	David Gutierrez

PACIFIC GAS AND ELECTRIC COMPANY
 2023 GENERAL RATE CASE PHASE II
 EXHIBIT (PG&E-3)
 REVENUE ALLOCATION AND RATE DESIGN
 ERRATA TESTIMONY

TABLE OF CONTENTS
 (CONTINUED)

Chapter	Title	Witness
9	RATE PROGRAMS FEES FOR SERVICES TO COMMUNITY CHOICE AGGREGATION AND DIRECT ACCESS ELECTRIC SERVICE PROVIDERS (NO CHANGE)	Thomas Wong
Attachment A	PROPOSED RED-LINED FEE REVISIONS TO SCHEDULE E-CCA (NO CHANGE)	Thomas Wong
Attachment B	PROPOSED RED-LINED FEE REVISIONS TO SCHEDULE E-ESP (NO CHANGE)	Thomas Wong
10	IMPLEMENTATION AND MARKETING, EDUCATION, AND OUTREACH	Emily Bartman Jamie Chesler

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
INTRODUCTION TO
REVENUE ALLOCATION AND RATE DESIGN

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
REVENUE ALLOCATION

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
ATTACHMENT A
REQUIRED DISTRIBUTION AND GENERATION CHANGES FOR
EACH YEAR OF THE TRANSITION PLAN

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
ATTACHMENT B
RATE DESIGN GUIDELINES TO IMPLEMENT REVENUE
REQUIREMENT CHANGES

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
RESIDENTIAL RATE DESIGN

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
COMMERCIAL AND INDUSTRIAL RATE DESIGN

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
ATTACHMENT A
DETAILED GUIDELINES FOR CHANGING RATES FOR
REVENUE CHANGES

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 5
AGRICULTURAL RATE DESIGN

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 6
STREETLIGHTING RATE DESIGN

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 7
BUSINESS ELECTRIC VEHICLES RATE DESIGN

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 8
THE ECONOMIC DEVELOPMENT RATE

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
RATE PROGRAMS FEES FOR SERVICES TO
COMMUNITY CHOICE AGGREGATION AND
DIRECT ACCESS ELECTRIC SERVICE PROVIDERS

THIS CHAPTER HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
ATTACHMENT A
PROPOSED RED-LINED FEE REVISIONS TO
SCHEDULE E-CCA

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 9
ATTACHMENT B
PROPOSED RED-LINED FEE REVISIONS TO
SCHEDULE E-ESP

THIS ATTACHMENT HAS NO ERRATA

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 10
IMPLEMENTATION AND
MARKETING, EDUCATION, AND OUTREACH

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 10
IMPLEMENTATION AND
MARKETING, EDUCATION, AND OUTREACH

TABLE OF CONTENTS

A. Introduction.....	10-1
B. Organization of the Rest of This Chapter and Witness Responsibilities	10-1
C. Billing Modernization Initiative and Constraints on Billing System Structural Changes [Witness: Emily Bartman]	10-1
1. Introduction	10-1
2. Background on Multi-Year Billing Modernization Initiative.....	10-3
3. PG&E's Rates Implementation Pipeline	10-6
4. Billing Modernization Conclusion	10-11
D. Marketing, Education, and Outreach [Witness: Jamie Chesler].....	10-11
1. Summary of ME&O Proposals	10-11
a. Summary of ME&O Approach for Rate and Customer Charge Proposals Pending Decision Authorization for Each Customer Class.....	10-12
b. Summary of ME&O Proposals With Identified ME&O Needs	10-12
2. ME&O Proposals	10-13
a. ME&O Approach for Rate and Customer Charge Proposals Pending Decision Authorization for Each Customer Class	10-13
1) Approach for Planning ME&O	10-14
2) Customer Classes with Proposed Changes	10-15
3) Bill Impact Analysis	10-15
4) Customer Outreach	10-16
5) Resources to Develop and Implement the ME&O Plan.....	10-17
b. Planned ME&O for All-Electric Baseline, Rate Eligibility EV2 & E-ELEC, and SmartRate.....	10-17
1) Re-Label "All-Electric" Baseline to "Electric Space Heating" Baseline (Residential)	10-17

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 10
IMPLEMENTATION AND
MARKETING, EDUCATION, AND OUTREACH

TABLE OF CONTENTS
(CONTINUED)

2) Residential Rate Eligibility: Remove 800 Percent of Baseline Usage Limit for EV2 and Remove E-ELEC Technology Requirements	10-18
3) SmartRate: Eliminate Minimum SmartDay Requirements	10-18
4) Sunset 75 kW Legacy Treatment on Schedules A6 and B6	10-19
E. Conclusion	10-20
1. Billing Modernization Initiative and Constraints on Billing System Structural Changes [Witness: Emily Bartman]	10-20
2. Marketing, Education, and Outreach [Witness: Jamie Chesler]	10-20

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 10

IMPLEMENTATION AND MARKETING, EDUCATION, AND OUTREACH

A. Introduction

In this chapter, Pacific Gas and Electric Company (PG&E) addresses two aspects of implementation for this 2023 General Rate Case Phase II (GRC II) application. First, in Section C of this chapter, PG&E describes our multi-year billing modernization initiative and its impacts on rate implementation timing. Second, in Section D of this chapter we discuss the Marketing, Education, and Outreach (ME&O) efforts that are necessary to support the proposals in this application.

B. Organization of the Rest of This Chapter and Witness Responsibilities

The remainder of this chapter is organized as follows:

- Section C – Billing Modernization Initiative and Constraints on Billing System Structural Changes;
- Section D – Marketing, Education, and Outreach; and
- Section E – Conclusion.

The witness responsibilities for this chapter are as follows:

- Emily Bartman – Section C (Billing Modernization Initiative and Constraints on Billing System Structural Changes); and
- Jamie Chesler – Section D (Marketing, Education, and Outreach).

C. Billing Modernization Initiative and Constraints on Billing System Structural Changes [Witness: Emily Bartman]

1. Introduction

PG&E is currently undertaking a multi-year billing modernization initiative which began in 2020 and implementation of an Integrated Modernized Billing System is expected to be completed complete and ready

1 for new projects to be programmed in Q4 of 2029-2031.¹ PG&E must
 2 modernize its outdated billing systems to continue to deliver reliable
 3 customer service, including continuing to provide billing services to
 4 customers.² This modernization initiative will also allow more efficient
 5 implementation of future structural changes to the new billing system,
 6 including new rates and rate programs and modifications to existing rates
 7 and rate transitions (discussed further below).³ There are limits on PG&E's
 8 ability to implement the large number of already adopted projects in PG&E's
 9 rates implementation pipeline and any additional new rate proposals
 10 adopted in this proceeding that would require structural changes to the
 11 billing system during billing modernization. Thus, if the California Public
 12 Utilities Commission's (CPUC or Commission) final decision in this 2023
 13 GRC II proceeding is approved prior to completion of billing modernization,
 14 these limitations will have an impact on when any rate design changes with

¹ Updates to the Billing Modernization Initiative timeline are presented in A.24-10-014, PG&E Supplemental Testimony (March 17, 2026), p. 1, line 14 to p.25, line 15. The new Integrated Modernized Billing System will go-live in 2030 followed by stabilization in 2031 (further details are provided in Section C2 below).

² For a more detailed description of the challenges related to the legacy billing system, see PG&E Initial Testimony in A.24-10-014 (dated Oct. 23, 2024), Chapter 2, Legacy Billing Systems Overview. Among the challenges are remediating asset failure risk, eliminating known cyber vulnerabilities, and implementing modern technology capable of keeping pace with the complexities of California Energy Policy.

³ For a more detailed description of the features and functionality of the new billing system, see PG&E Initial Testimony in A.24-10-014 (dated Oct. 23, 2024), Chapter 4, Target State Billing System.

1 structural⁴ billing system impacts can be completed and rolled out into
2 customers' bills.⁵

3 PG&E initially sought approval for a billing system upgrade project in its
4 2023 General Rate Case I (the 2023 GRC) (Application 21-06-021) to
5 modernize its billing systems. However, in Decision (D.) 23-11-069, the
6 CPUC found that PG&E's 2023 GRC Phase I application lacked sufficient
7 detail to support the forecasted cost of its billing system upgrade project and
8 authorized PG&E to file a separate application that includes seven
9 categories of additional information.⁶ PG&E submitted such an application
10 in October 2024 (A.24-10-014).⁷ and supplemental testimony in
11 March 2026.⁸

12 The following sections provide more details on the Billing Modernization
13 Initiative and the status of PG&E's rates implementation pipeline.

14 **2. Background on Multi-Year Billing Modernization Initiative**

15 In September 2024, PG&E ~~currently has~~had two "legacy" billing
16 systems, the Advanced Billing System (ABS) which ~~includes~~included over

4 A structural change would require coding and testing of new billing parameters and/or calculations, whereas a value change would entail a numerical adjustment to a parameter that already exists in PG&E's billing systems. Structural changes to the billing system require new variables, formulas, or billing determinants to calculate bills, which involve extensive coding and testing. Examples of structural changes would be adding a new charge or changing the hours associated with Time of Use Periods. Value changes entail a numerical adjustment to a rate parameter that is already coded in PG&E's billing systems, such as changing prices associated with an existing rate structure. Value changes do not require extensive coding changes and can be implemented much more quickly.

5 The current expectation for a 2023 GRC II decision in this proceeding is estimated to be no earlier than mid-~~2026~~2027, whereas the ~~billing modernization~~new Integrated Modernized Billing System is projected to ~~be completed~~go-live in ~~Q4 2029-2030~~followed by stabilization in 2031.

6 D.23-11-069, pp. 546-550.

7 A.24-10-014, Billing Modernization Initiative, October 23, 2024.

8 A.24-10-014, ~~Billing Modernization Initiative, October 23, 2024~~PG&E Supplemental Testimony (March 17, 2026), p.1, line 14 to p.25, line 15.

1 ~~140,000~~^{172,280} customers ~~who take~~^{taking} service on our most complex
 2 electric rates¹⁰ and the Customer Care and Billing system (CC&B) which
 3 ~~includes~~^{included} about 6 million customers on simpler electric rates. These
 4 legacy systems were implemented before Advanced Metering Infrastructure
 5 was deployed and have required heavy customization to be able to support
 6 increasing numbers and complexity of rates and rate program combinations.

7 ~~Recently~~-Adopted rate projects that would typically be built in ABS
 8 (e.g., Load Aggregation Net Billing Tariff (~~NBT~~-Aggregation, ~~NBT~~-NBTA),
 9 Virtual-Net Billing Tariff (NBTV),¹¹ Residential Fixed Charge for Complex
 10 Net Energy Metering (NEM)¹² customers ~~in ABS~~^{have been} ~~were~~ delayed
 11 until a replacement for ABS ~~is~~^{was} in place, because there ~~is~~^{was} too high a
 12 risk that building anything new in ABS might jeopardize billing for the over
 13 ~~140,000~~^{172,280} customers on complex rates. ~~Currently~~, ABS ~~has~~
 14 exceeded its planned capacity of customers, which ~~has~~ resulted in latency
 15 in processing and performance issues that impact both PG&E's complex
 16 billing operations and customers.

17 The Billing Modernization Initiative consists of three major workstreams.
 18 The first major workstream has been completed and the remaining two are
 19 underway:

- 20 1. Replace ABS with Oracle's Billing Cloud System (BCS) for Electric
 21 Customers: PG&E ~~has~~ prioritized replacement of ABS with BCS to
 22 address the risk of not being able to provide accurate and timely bills for

⁹ Before the Billing Modernization began, PG&E had 172,280 customers in the ABS system. PG&E deployed Billing Cloud System (BCS), which replaces ABS, on August 22, 2025. On August 23, 2025, 171,759 ABS electric customers were transitioned to BCS. The remaining 521 electric customers (Departing Load) were transitioned to PG&E's SAP system and are now being billed there. Only 1,873 gas customers remain in ABS.

¹⁰ Such as NEM rates that involve calculations based on usage data from multiple meters (e.g., NEM-Aggregation, NEM-Virtual).

¹¹ NBTA and NBTV are currently planned projects in the rates implementation pipeline with compliance dates of March 1, 2027, and May 1, 2028, respectively. PG&E submitted Additional Time to Comply under Rule 16.6 on March 31, 2026, with CPUC Executive Director Approval dated April 21, 2026.

¹² Residential Fixed Charge deployed for all customers in CC&B and BCS (including Complex NEM) on March 1, 2026.

the over ~~140,000~~172,280 electricity customers billed in ABS.¹³ PG&E began work on BCS in 2020 and had originally planned to launch it in late 2023. However, rebuilding all of the complex ABS NEM rates in BCS proved to be more difficult than anticipated, ~~and PG&E is now planning to launch.~~¹⁴ BCS was launched in ~~mid-~~August 2025.¹⁵

2. Upgrade CC&B: The delay in delivery of BCS to mid-2025 caused the final workstream to complete modernization of the billing system to be pushed out from 2026 to ~~2029~~2031 at the earliest, necessitating reliance on CC&B for at least an additional ~~three~~five years. PG&E determined the best path to ensure stability of CC&B through this period is to implement a technical upgrade of CC&B from version 2.4 (implemented in 2017) to CC&B 25.~~44~~. PG&E expects to complete the CC&B upgrade by Q2 2027 with stabilization through the end of 2027.¹⁶
3. Implement Integrated Modernized Billing System: The final phase will implement a new modernized billing system that will consolidate all customers in BCS ~~and~~, all customers in CC&B, and all gas customers in ABS, into one unified modular system. PG&E expects to complete implementation of the ~~new more advanced~~Integrated Modernized Billing System in ~~2029~~2030, and stabilization of the Integrated Modernized Billing System in 2031.

If the new integrated modernized billing system goes live ~~at the end of 2029~~in 2030 as expected, new prioritized rate projects can begin to be programmed in ~~2030~~2031, after approximately 12 months of system stabilization. The specific timelines and project details of the billing

¹³ PG&E plans to move the gas customers in ABS into ~~BCS at a later time~~C2M in the final phase. Moving the electric customers first will significantly reduce the risk of ABS issues.

¹⁴ For a more detailed description on the difficulties and challenges to replace ABS with BCS, see PG&E Initial Testimony in A.24-10-014 (dated Oct. 23, 2024), Chapter 5, Billing Modernization Initiative Implementation.

¹⁵ A.24-10-014, PG&E Supplemental Testimony (March 17, 2026), p. 5, line 27 to p. 6, line 2.

¹⁶ Please note that Oracle changed their versioning scheme after CC&B 2.9 was released, and 25.~~44~~ is the first release after 2.9. The schedule for the CC&B upgrade is presented in A.24-10-014, PG&E Supplemental Testimony (March 17, 2026), p. 7, Table 2.

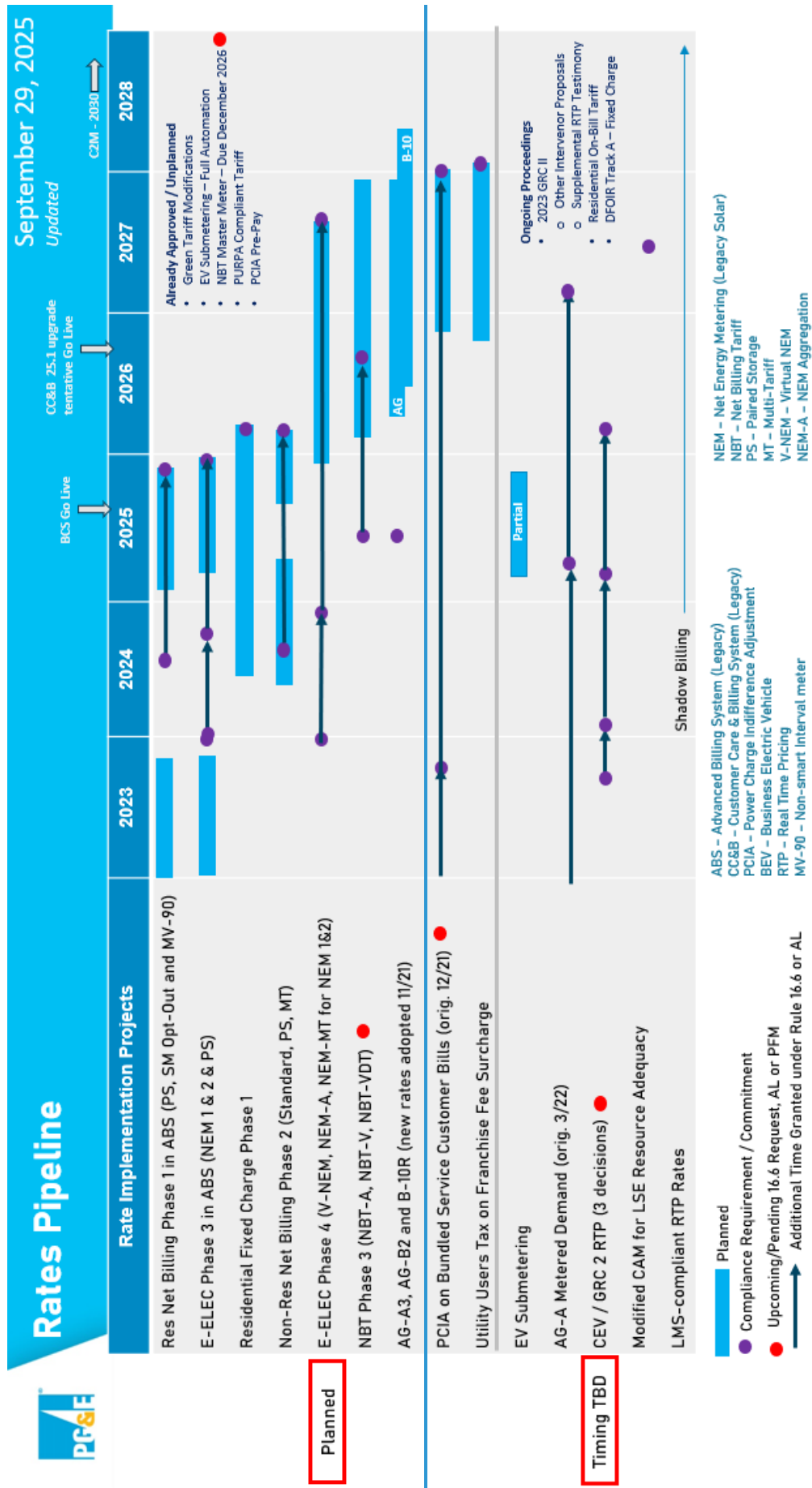
modernization were ~~presented~~updated in supplemental testimony in PG&E's Billing Modernization Application ~~to be filed in October 2024~~submitted on March 17, 2026, (A.24-10-014). A decision in this Application is pending and expected to validate PG&E's proposed path forward for the third phase to implement an Integrated Modernized Billing System.

3. PG&E's Rates Implementation Pipeline

As the Commission is aware, there is currently a significant backlog of PG&E rate projects that have already been adopted by the CPUC but are not yet able to be programmed into PG&E's billing system (Figure 10-1). Prioritization and scheduling of the unscheduled rate projects, and any additional projects adopted by the CPUC, will depend on the funding and timelines adopted in the Billing Modernization Initiative proceeding decision. PG&E expects to complete a comprehensive reprioritization of the Rates Implementation Pipeline approximately three to six months after a final CPUC decision in the Billing Modernization Initiative proceeding is issued.¹⁷

¹⁷ PG&E ~~meets~~continues to monitor its pipeline of rate projects and meet regularly with ~~the CPUC's~~CPUC Energy Division staff to ~~keep them informed of~~provide updates on the Billing Modernization Initiative and its impacts on ~~already~~adopted rate projects. This supports the goal that compliance dates are met or, when needed, that additional time to comply is requested under Rule 16.6. The Rates Implementation Pipeline will continue to be subject to updates as necessary. PG&E will provide additional updates if there is a material change.

FIGURE 10-1
PG&E'S RATES IMPLEMENTATION PIPELINE





Rates Pipeline

July 31, 2026
Updated

Status	#	Rate Projects with Compliance Dates	2023	2024	2025	2026	2027	2028
Planned (Subject to Change)	1	Medical Discount (EV2A and ETOUD) – Full Automation						
	2	Load Aggregation Net Billing Tariff (NBTA)						
	3	AG-A3 and AG-B2						
	4	Utility Users Tax on Franchise Fee Surcharge						
Reprioritized after final decision in A.24-10-014 BMI	5	Virtual Net Billing Tariff (NBTV)						
	1	E-ELEC Phase 4 (V-NEM, NEM-A, NEM-MT for NEM 1&2)						
	2	B-10R						
	3	PCIA on Bundled Service Customer Bills (orig.12/21)						
	4	AG-A Metered Demand (orig. 3/22)						
	5	CEV / GRC 2 RTP (3 decisions pending PFM)						
	6	Modified CAM for LSE Resource Adequacy						
#	Adopted / Unplanned	#	Ongoing Proceedings	Adopted / Workarounds in Place	Acronyms			
1	Green Tariff Modifications	1	2023 General Rate Case (GRC) II including other Intervenor proposals and LMS Compliant rates	6 projects are being delivered with workarounds to be automated	CAM Cost Allocation Methodology			
2	EV Submetering- Full Automation	2	Large Load (Rule 30 Transmission Rate)		CEV Clean Energy Vehicle			
3	PURPA Compliant Tariff	3	Residential Gas Fixed Charge		CCA Community Choice Aggregation			
4	PCIA Pre-Pay	4	Advanced Rate Design Order Instituting Rulemaking (ARDOIR) including Fixed Charge, Large Load, Heat Producer Exemptions, Res/Non-Res Rate Reform and other intervenor proposals		GRC General Rate Case			
5	Demand Response (DR) credits for CCA customers	5	Biomethane Line Item on Bill		LMS Load Management Standard (CEC)			
6	NBT/NBTV Master Meter	6	Residential On-Bill Tariff		LSE Load Serving Entity			
7	NBT Virtual Dual Tariff	7	California Climate Credit Redesign		PCIA Power Charge Indifference Adjustment			
8	Net Energy Metering (NEM) Bill Redesign	8	Community Renewable Energy (CRE)		RTP Real Time Pricing			
9	Negative PCIA	9	Rule 17.1 Application (Rules around Cancel/Rebill)					

Note: The six rate projects with workarounds in place include: (1) Food Bank Discount, (2) High Usage Surcharge (HUS) Tier 3 Removal on Bill, (3) Standby Reservation Charge Exemption, (4) Decorative Streetlight Rate, (5) Local Green Saver, and (6) 2023 GRC Phase II – RTP Pilot Rates for all customer classes (shadow billing).

1 ~~Because of the planned go-live of~~Since BCS went live in ~~mid-~~late 2025,
2 rate projects that depend on BCS ~~(for customers currently in ABS)~~ can be
3 programmed in parallel with the CC&B Upgrade and further modernized
4 billing system development. In the last ~~two~~several years, PG&E has needed
5 to submit requests for additional time to comply, under Rule 16.6, for over
6 20 rate projects adopted in previous GRC II and other proceedings. Table
7 10-1 below lists PG&E's requests for additional time to comply for rate
8 projects, the status of those requests, and additional scheduling
9 accommodation requests PG&E plans to submit ~~over the next few~~
10 ~~years~~year.

TABLE 10-1
PG&E'S REQUEST FOR ADDITIONAL TIME TO COMPLY UNDER RULE 16.6
(AS OF ~~MARCH 20, 2025~~ JULY 23, 2026)

Previous Rule 16.6 Requests		Original / Revised Compliance Date		Approved	ABS – Advanced Billing System (Legacy) CC&B – Customer Care & Billing System (Legacy) PCIA – Power Charge Indifference Adjustment BEV – Business Electric Vehicle RTP – Real Time Pricing NEM – Net Energy Metering (Legacy Solar) NBT – Net Billing Tariff V-NEM – Virtual NEM NEM-A – NEM Aggregation PS – Paired Storage
1. Food Bank Discount – Annual to Monthly*		12/31/21	1/1/22	12/1/2021	
2. PCIA on the Bundled Billing Statement – FR		12/1/21	10/1/23	11/2/21	
3. AG-A (Legacy) Metered Demand – FR		3/1/22	3/31/25	11/24/21	
4. Master Meter Version of E-TOU-C*		1/1/23	10/1/23	4/24/22	
5. E-ELEC for Simple Legacy NEM & PS in ABS – FR		12/31/23	1/1/24	4/26/23	
6. E-ELEC for Complex Legacy NEM in ABS – FR		12/31/23	12/31/24	4/26/23	
7. BEV RTP Rate – FR		10/31/23	2/28/24	4/26/23	
8. BEV Non-NEM Export Pilot (RTP) – FR		10/31/23	2/28/24	4/26/23	
9. GRC 2 RTP Pilot Rates – FR		10/31/23	2/28/24	4/26/23	
10. Medical Discount for EV2-A customers* – FR		12/31/23	12/1/24	4/26/23	
11. PCIA on the Bundled Billing Statement – SR		10/1/23	12/31/27	4/26/23	
12. GRC 2 Pilot Rates – SR		2/28/24	2/28/25	12/11/23	
13. NBT Phase 1 – Residential*		12/15/23	4/1/24	12/14/23	
14. E-ELEC for Simple Legacy NEM & PS in ABS – SR		1/1/24	10/1/24	12/26/23	
15. NBT PS billed as NBT in CC&B (Advice Letter)		4/15/24	4/15/24	4/14/24	
16. NBT for SmartRate		4/15/24	7/1/25	4/8/24	
17. NBT for Non-SmartMeter Customers in ABS		4/15/24	12/31/25	4/8/24	
18. BEV RTP Rate – SR		2/28/24	2/28/25	2/28/24	
19. BEV Non-NEM Export Pilot (RTP) – SR		2/28/24	2/28/25	2/28/24	
20. NBT Phase 2 – Non-Residential		6/30/24	3/2026	6/20/24	
21. E-ELEC for Simple Legacy NEM & PS in ABS – TR		12/31/24	1/2026	9/19/24	
22. E-ELEC for Complex Legacy NEM in ABS – SR		12/31/24	9/2027	9/19/24	
23. GRC 2 RTP Pilot Rates – TR		2/28/25	2/28/26	3/3/25	
24. BEV RTP Rate – TR		2/28/25	2/28/26	2/20/25	
25. BEV Non-NEM Export Pilot (RTP) – TR		2/28/25	2/28/26	2/20/25	
26. AG-A (Legacy) Metered Demand – SR		3/2025	12/31/27	2/27/25	
27. NBT Phase 3 – NBT-Virtual and NBT-Aggregation – FR		6/30/25	9/30/26	6/30/25	
Planned Rule 16.6 Requests					
1. NBT Phase 3 – NBT-A, NBT-V, and NBT-VDT – SR		9/30/26			2/28/26
2. PCIA on the Bundled Billing Statement – TR		12/31/27			2/28/26
3. Modified Cost Allocation Method. for LSE Resource Adequacy		7/31/27			2/28/26
			1. GRC 2 RTP Pilot Rates – 4R		
			2. BEV RTP Rate – 4R		
			3. BEV Non-NEM Export Pilot (RTP) – 4R		

Number	Previous Rule 16.6 Requests	# of Request	Original Compliance Date	Revised Compliance Date	Approved
1	Food Bank Discount – Annual to Monthly*	Only One Request	12/31/2021	1/1/2022	12/1/2021
2	PCIA on Bundled Service Customer Bills	First Request	12/1/2021	10/1/2023	11/2/2021
3	AG-A Metered Demand	First Request	3/1/2022	3/31/2025	11/24/2021
4	Master Meter Version of E-TOU-C*	Only One Request	1/1/2023	10/1/2023	4/24/2022
5	E-ELEC Phase 3 – NEM 1 & 2 & PS in BCS*	First Request	12/31/2023	1/1/2024	4/26/2023
6	E-ELEC Phase 4 – V-NEM, NEM-A, NEM-MT for NEM 1&3	Only One Request	12/31/2023	12/31/2024	4/26/2023
7	CEV RTP	First Request	10/31/2023	2/28/2024	4/26/2023
8	CEV Non-NEM RTP Export Pilot	First Request	10/31/2023	2/28/2024	4/26/2023
9	GRC 2 RTP Pilot Rates (PFM)	First Request	10/31/2023	2/28/2024	4/26/2023
10	Medical Discount for EV2-A customers	Only One Request	12/31/2023	12/1/2024	4/26/2023
11	PCIA on Bundled Service Customer Bills	Second Request	10/1/2023	12/31/2027	4/26/2023
12	GRC 2 RTP Pilot Rates	Second Request	2/28/2024	2/28/2025	12/11/2023
13	Net Billing Tariff (NBT) Phase 1 – Residential*	Only One Request	12/15/2023	4/1/2024	12/14/2023
14	E-ELEC Phase 3 – NEM 1 & 2 & PS in BCS*	Second Request	1/1/2024	10/1/2024	12/26/2023
15	Phase 1a: NBT PS billed as NBT in CC&B (Advice Letter)*	Only One Request	4/15/2024	4/15/2024	4/14/2024
16	NBT for SmartRate*	Only One Request	4/15/2024	7/1/2025	4/8/2024
17	Phase 1b: NBT for Non-SmartMeter Customers in BCS*	Only One Request	4/15/2024	12/31/2025	4/8/2024
18	CEV RTP (PFM)	Second Request	2/28/2024	2/28/2025	2/28/2024
19	CEV Non-NEM RTP Export Pilot (PFM)	Second Request	2/28/2024	2/28/2025	2/28/2024
20	NBT Phase 2 – Non-Residential*	Only One Request	6/30/2024	3/31/2026	6/20/2024
21	E-ELEC Phase 3 – NEM 1 & 2 & PS in BCS*	Third Request	12/31/2024	1/1/2026	9/19/2024
22	E-ELEC Phase 4 – V-NEM, NEM-A, NEM-MT for NEM 1&3	Second Request	12/31/2024	9/1/2027	9/19/2024
23	GRC 2 RTP Pilot Rates (PFM)	Third Request	2/28/2025	2/28/2026	3/3/2025
24	CEV RTP (PFM)	Third Request	2/28/2025	2/28/2026	2/20/2025
25	CEV Non-NEM RTP Export Pilot (PFM)	Third Request	2/28/2025	2/28/2026	2/20/2025
26	AG-A Metered Demand	Second Request	3/31/2025	12/31/2027	2/27/2025
27	NBT Phase 3 - Virtual NBT (VNBT) and Load Aggregation NBT (NBTA)	First Request	6/30/2025	9/30/2026	6/30/2025
28	CEV / GRC 2 RTP	Fourth Request	2/28/2026	2/28/2027	2/13/2026
29	NBT Phase 3 - Virtual NBT (VNBT) and Load Aggregation NBT (NBTA)	Second Request	6/30/2025	3/1/27 and 5/1/28	4/21/2026
	*Completed				
Number	Planned Rule 16.6 Requests	# of Request	Compliance Date		
1	CEV / GRC 2 RTP	Fifth Request	2/28/2027		
2	Modified Cost Allocation Method. for LSE Resource Adequacy	First Request	7/31/2027		
3	PCIA on Bundled Service Customer Bills	Third Request	12/31/2027		
4	E-ELEC Phase 4 – V-NEM, NEM-A, NEM-MT for NEM 1&2	Third Request	9/1/2027		

4. Billing Modernization Conclusion

In summary, if the CPUC's decision in this 2023 GRC II proceeding were to adopt any new rate proposals that require structural changes to PG&E's billing systems, programming of ~~some of~~ these proposals may need to be delayed until after the Billing Modernization Initiative has been finalized, and then prioritized among the previously-adopted rate projects already in the rates implementation pipeline.

D. Marketing, Education, and Outreach [Witness: Jamie Chesler]

This testimony includes several proposals that require outreach to customers once the CPUC issues a final decision in this proceeding. PG&E's proposed changes to revenue allocations are intended to bring Residential, Agricultural, Commercial and Industrial, and Business Electric Vehicle (BEV) customer rates closer to their cost of service. These changes will require ME&O at varying levels depending on the outcomes adopted in the final decision. Proposals seeking to modify program parameters, rate eligibility, baseline naming, if approved, will require updates to customer support materials and program webpages, and in some instances, customer notifications will be necessary.

1. Summary of ME&O Proposals

PG&E identified a number of proposals that will need ME&O and/or changes to outreach materials if the proposals are adopted and implemented. For proposals that PG&E can identify the types of customer communications and/or outreach materials updates necessary, PG&E provides that information. However, there are some proposals across several customer classes that are intended to move customers' rates closer to the cost of service by making changes to time-of-use (TOU) tier differentials and revising customer charges. These proposals span Residential, Commercial and Industrial, Agricultural, and BEV customer classes. For these proposed changes, it is premature to identify specific ME&O that will be necessary until a final decision makes a determination of all rate-related changes that will impact the customer's bills so they can be analyzed and evaluated for ME&O needs holistically. For these proposals,

PG&E has provided the high-level approach that will be taken for planning ME&O.

The ME&O Proposals below are organized into two sections. The first discusses PG&E's overall approach for determining the level of customer communications once all rate-related changes for each customer class are authorized. The second part provides proposals for which PG&E is already able to provide more specific details on the ME&O that will be needed.

a. Summary of ME&O Approach for Rate and Customer Charge Proposals Pending Decision Authorization for Each Customer Class

Once the final decision adopts final values for the Baseline Quantities (BQ), TOU/Tier differentials and customer charges for Commercial and Industrial, BEV, Agricultural, and Residential customer rates, PG&E will conduct bill impact analysis for these customer segments. The bill impact analysis for each group of customers will inform the ME&O plan, including but not limited to conducting outreach to significantly impacted customers to make them aware of the change(s), timing of outreach to communicate the changes, and what resources and tips are needed to help customers manage their energy bill. (Please see Section 2.a. below for further detail on PG&E's overall ME&O approach).

b. Summary of ME&O Proposals With Identified ME&O Needs

The planned ME&O for more fully known proposals within PG&E's GRC II rate proposals, if adopted, includes:

- 1) All-Electric Baseline Name Change (Residential): If PG&E's proposal to change the name "All-Electric Baseline" to "Electric Space Heating Baseline,"¹⁸ is adopted, PG&E plans to communicate the change via a bill message. The bill message will explain the name change once the billing system update occurs and the revised name is shown on customers' bills. (Please see section 2.b.1. below, for additional details).

¹⁸ See Re-Label All-Electric Baseline in Section E.3. Chapter 3 of this exhibit (PG&E-3).

- 1 2) Schedule Electric Vehicle (EV)2 (Residential): If PG&E's proposal
 2 to remove the requirement for customers' usage to be under
 3 800 percent of their baseline to remain eligible for the EV2 rate is
 4 adopted,¹⁹ PG&E plans to update rate materials and revise the rate
 5 description on PG&E's website. PG&E also plans to notify
 6 customers who were previously removed from EV2 for exceeding
 7 the 800 percent baseline threshold to offer them the opportunity to
 8 return to service under this rate, if desired. (Please see
 9 Section 2.b.2. below, for additional details).
- 10 3) SmartRate™ (Residential): If PG&E's SmartRate proposal to
 11 eliminate the required nine SmartDay events minimum per year is
 12 adopted,²⁰ PG&E plans to notify enrolled customers of the change
 13 through regularly conducted pre-season communications; program
 14 marketing materials and PG&E's SmartRate Program webpage will
 15 also be updated accordingly. (Please see Section 2.b.3. below, for
 16 additional details).
- 17 4) Sunset legacy treatment for large customers on Rate Schedules A-6
 18 and B-6 (C&I): If PG&E's proposal to eliminate the legacy exemption
 19 for Commercial and Industrial NEM customers who exceed
 20 75 kilowatts (kW) is adopted,²¹ PG&E plans to notify the NEM
 21 customers who exceed 75 kW that they will be transitioned to a
 22 different rate that meets their demand usage. (Please see
 23 Section 2.b.4. below, for additional ME&O details).

24 **2. ME&O Proposals**

25 **a. ME&O Approach for Rate and Customer Charge Proposals Pending** 26 **Decision Authorization for Each Customer Class**

27 The final rate differentials and customer charges that will be adopted
 28 in the decision in this 2023 GRC II proceeding provide critical data
 29 necessary to determine the appropriate ME&O that is needed to help

¹⁹ See EV2 proposal in Chapter 3, Section G.6 of this exhibit (PG&E-3).

²⁰ See SmartRate proposal in Chapter 3, Section H of this exhibit (PG&E-3).

²¹ See Sunset 75 kW Legacy Treatment of Large Customers on A-6/B-6 in Chapter 4, Section D (Rate Design for SLP) of this exhibit (PG&E-3).

1 affected customer classes understand and prepare for the change(s).
2 To effectively determine the level of outreach needed for all customers
3 affected by the change(s) and those who fall in the spectrum of
4 positively or negatively impacted, PG&E will conduct a billing analysis
5 after the CPUC issues the final decision for this proceeding. The rates
6 and customer charges adopted, or in cases where only partial proposals
7 are ultimately adopted, will result in customers with varying bill impacts.

8 **1) Approach for Planning ME&O**

9 ME&O is a key component to customer understanding and
10 acceptance of upcoming rate changes. Customer communications
11 are carefully planned to ensure that customers receive information
12 at the right time, through the right channels commensurate with the
13 level of changes and the quantity, and types of impacted customers.

14 At this time, it is premature to develop the ME&O plan and
15 determine which channels should be utilized and at what advance
16 timing before TOU differential changes are implemented. Customer
17 communications will vary given the potential for wide variances in
18 customer impacts if the price differentials are greater/smaller than
19 proposed amounts or if only portions of proposals are adopted.
20 Once the Commission's final decision is issued and calculations are
21 made to determine the exact Peak to Off-Peak (POP) price
22 differentials and revised non-residential customer charges, PG&E
23 will utilize the analysis of expected customer impacts to determine
24 the most appropriate timing and tactics for notifying customers.

25 PG&E's ME&O plan will leverage significant learning and
26 experience in creating awareness and successfully transitioning
27 customers to new rate structures gained over the last decade.
28 PG&E has transitioned non-residential customers from flat rates to
29 TOU rates and from TOU rates to Peak Day Pricing (PDP) rates.
30 Throughout the TOU and PDP transitions, PG&E conducted
31 research that validated customer awareness and understanding of
32 the transition and how the new rates functioned. PG&E has also
33 transitioned residential customers from tiered rate schedules to TOU
34 rates and is preparing to educate customers on a fixed charge to be

implemented in 2026. These transitions were large and required significant education in advance and during the transition period. In addition to these large transitions to completely new rate structures, PG&E regularly communicates with customers when annual rate changes occur.

2) Customer Classes with Proposed Changes

The following customer classes have proposals that will require further analysis to identify what outreach is recommended.

Residential Customers:

- i) Tiered Rates: Reduce tier differentials;
- ii) TOU Rates: Update TOU price differentials;
- iii) BQ updates; and
- iv) Revise Diversity Benefit Adjustments for mobile home park and multifamily dwellings (Schedules ET and ES).

Commercial and Industrial Customers:

- i) Increase customer charge to better reflect marginal costs; decrease volumetric energy and demand charges;
- ii) Increase cost basis for TOU rate differentials—widens most peak to off peak period TOU differentials; and
- iii) Sunset 75 kW legacy treatment of customers on A6 and B6.

Agricultural Customers:

- i) Increase customer charge to better reflect marginal costs;
- ii) Decrease volumetric energy and demand charges;
- iii) Widen summer POP period TOU differentials; and
- iv) Increase Demand Charge Rate Limiter.

BEV Customers:

- i) Increase in distribution rates;
- ii) Decrease in generation rates;
- iii) Increases in subscription rates; and
- iv) Reduce POP period TOU differentials.

3) Bill Impact Analysis

Once the CPUC issues final approved rate changes and customer charges, PG&E will perform a detailed analysis to

1 evaluate the overall impact to customers' bills. This evaluation
 2 allows PG&E to determine how many customers will be impacted
 3 within each customer class, how many customers are expected to
 4 see a positive impact (bill reduction), neutral impact (bill stays in the
 5 same range), or negative impact (bill significantly increases). The
 6 results of this analysis will allow PG&E to: (1) segment the target
 7 audiences within each of the customer classes; and (2) determine
 8 the right level and frequency of customer communications to be
 9 delivered in advance to help customers prepare for the upcoming
 10 changes.

11 **4) Customer Outreach**

12 As mentioned, PG&E's ME&O plan will be tailored to provide
 13 customer communications with the right level of information, at the
 14 right time and through the right channels based on the positive,
 15 neutral, and negative impact of the authorized changes. The plan
 16 will vary to ensure that customers with more significant bill impacts
 17 will receive additional communications with advance notice to help
 18 create awareness of the change, information about how they can
 19 prepare for the change, provide additional resources to avoid high
 20 bill surprises and manage their energy use such as bill forecast
 21 alerts and cost and usage tools.

22 PG&E's outreach strategy will likely include a combination of the
 23 tactics below, although one or more tactics may not be used for a
 24 specific class:

- 25 • Direct-to-customer communications such as direct mail or
- 26 e-mail;
- 27 • On bill messaging or bill insert;
- 28 • Webpage(s) that provide additional information about the
- 29 change;
- 30 • Digital newsletters or other integrated communications as
- 31 appropriate; and
- 32 • Account Representatives may conduct person-to-person
- 33 outreach to their already assigned customers if they are
- 34 projected to be among the most highly impacted.

5) Resources to Develop and Implement the ME&O Plan

PG&E cannot determine the exact funding necessary for the outreach plan. To determine appropriate resourcing, PG&E must have a full understanding of the approved rates for all proposed customer classes, and how many customers and to what level they can expect positive, neutral or negative bill impacts. PG&E will seek funding authorization in PG&Es 2027 GRC Phase I to fund the development of outreach materials, execute outreach, and support continually evaluating the effectiveness of customer communications to allow for adjustment as needed.

b. Planned ME&O for All-Electric Baseline, Rate Eligibility EV2 & E-ELEC, and SmartRate

1) Re-Label “All-Electric” Baseline to “Electric Space Heating” Baseline (Residential)

As described in Chapter 3 of this exhibit, PG&E proposes to relabel the “All-Electric” BQs to “Electric Space Heating” BQs to avoid customer confusion and encourage electrification efforts. Despite the “all-electric” BQs name, customers are not required to have all-electric homes to qualify for the “All-Electric” BQ. Rather, a customer only needs to use permanent electric space heating for their primary space heating needs. The term “All-Electric” baseline level dates back to when EVs, heat pump water heaters and electric stoves were not as common and has taken on a different meaning now that customers are purchasing multiple home electrification technologies.

Relabeling to “Electric Space Heating” BQ will help customers from assuming a rate with an “All-Electric” BQ is the only rate or is the best rate if they completely electrify their home when they may benefit from a non-tiered rate such as Schedule E-ELEC.

If PG&E’s proposal in Chapter 3 to re-label “All-Electric” baseline to “Electric Space Heating” baseline is approved, PG&E plans to provide bill messaging to explain this is a name change that will appear on customers’ bills at the time the reprogramed name is

implemented. PG&E will also update existing electrification marketing materials and corresponding online baseline allowance webpages to reflect the change.

2) Residential Rate Eligibility: Remove 800 Percent of Baseline Usage Limit for EV2 and Remove E-ELEC Technology Requirements

As described in Chapter 3 of this exhibit, PG&E proposes to remove Schedule EV2's requirement that customers must remain under 800 percent of their baseline to remain eligible for the rate. This change aligns with our state's electrification/decarbonization policy and will improve the customer experience for EV customers who may charge more than one EV on their premise and may also install other new electrification appliances, to retain their eligibility for the EV2 rate. Once this proposal is approved, PGE.com will be updated to remove the requirement to use less than 800 percent of their BQ to remain eligible for the rate. Customers who became ineligible and were removed from the EV2 rate for exceeding 800 percent of their BQ will be notified of the EV2 eligibility changes. These customers will be advised of the opportunity to opt into the Schedule EV2 again (or Schedule E-ELEC), whichever may best suit their current needs.

As described in Chapter 3 and Chapter 10, PG&E proposes to eliminate the requirement for qualifying technology (specifically, electric vehicles, energy storage, and electric heat pumps) to be eligible for the E-ELEC rate schedule for customers on RTP.²² Once PG&E's proposal is approved, PGE.com and customer program materials will be updated to remove the technology requirements if the customer elects RTP from E-ELEC.

3) SmartRate: Eliminate Minimum SmartDay Requirements

Customers who voluntarily enrolled in PG&E's SmartRate™ Program will see a minor change to the program if the CPUC approves PG&E's proposal. The program as currently approved

²² See Eligibility in Chapter 10, Section K of this exhibit (PG&E-3).

1 calls a minimum of nine and a maximum of fifteen SmartDay events
 2 per year. As described in Chapter 3 of this exhibit, PG&E proposes
 3 to eliminate the nine SmartDay event minimum. In mild summers,
 4 there may not be a need for nine events. This change prevents
 5 customers being asked to conserve energy on a SmartDay when
 6 load reduction is not necessary. PG&E's proposal does not seek to
 7 modify the maximum of 15 events per year.

8 SmartRate outreach materials, seasonal communications and
 9 PGE.com SmartRate webpage description of the program will be
 10 revised to remove the reference to a minimum of nine events per
 11 year. Current SmartRate customers will be informed of the minor
 12 program change through the seasonal program communication they
 13 already receive.

14 **4) Sunset 75 kW Legacy Treatment on Schedules A6 and B6**

15 As proposed in Chapter 4 of this exhibit, PG&E proposes to
 16 sunset the legacy treatment of customers on Schedules A6 and B6
 17 who have remained on the rate schedules under a legacy exemption
 18 that allows exceeding the—75 kW—eligibility requirement.²³ PG&E
 19 proposes to adopt December 31, 2027 for public agencies and July
 20 31, 2027 for all other nonresidential customers as an expiration date
 21 for the 75 kW Legacy Treatment. As of June 2024, there are about
 22 2,000 customers enrolled in Schedules A-6 or B-6 with demand
 23 exceeding 75 kW. These customers will be notified at least one
 24 month in advance of the transition, via channels such as direct mail
 25 and e-mail. Communications will explain the end of the legacy
 26 treatment, provide the planned sunset date and inform the customer
 27 of the rate schedule they will be transitioned to that aligns with their
 28 demand.

²³ See Proposal in Chapter 4, Section D.4 of this exhibit (PG&E-3).

E. Conclusion

1. Billing Modernization Initiative and Constraints on Billing System Structural Changes [Witness: Emily Bartman]

Due to PG&E's multi-year Billing Modernization Initiative and existing pipeline of already-approved rate projects, if the CPUC's decision in this 2023 GRC II proceeding were to adopt any new rate proposals that require structural changes to PG&E's billing systems, programming of ~~some of these~~any such proposals may need to be delayed until after the Billing Modernization Initiative has been ~~finalized~~stabilized, expected in 2031, and ~~then~~ prioritized among the previously-adopted rate projects already in the rates implementation pipeline.

2. Marketing, Education, and Outreach [Witness: Jamie Chesler]

PG&E's ME&O plan, for this 2023 GRC II proceeding, will leverage our extensive experience supporting customers through rate structure transitions and rate changes. Development of more detailed outreach plans will rely on evaluation of bill impacts from approved changes, to arrive at a plan designed to increase customers' understanding and awareness of changes to their bill, the timing of such changes, and provide customers with resources to help them effectively manage their energy use and bills, accordingly.