

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

Application of San Diego Gas & Electric	)	
Company (U902E) for Approval of Low	)	
Income-Income Assistance Programs and	)	A.25-06-022
Budgets for Bridge Funding for Program	)	
<u>Year 2027.</u>	)	
	)	
And Related Rulings.	)	A. 25-06-023
	)	A.25-06-024
	)	A.25-06-025

**CALIFORNIA EMERGING TECHNOLOGY FUND  
OPENING TESTIMONY**

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Technology Fund

November 21, 2025

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**CALIFORNIA EMERGING TECHNOLOGY FUND**

**OPENING TESTIMONY**

Pursuant to the schedule set by the “Administrative Law Judge’s Ruling Presenting Draft List of Scoping Issue and Schedule for Consideration Prior to Prehearing Conference,” dated August 14, 2025, and Rule 13.8 of the Commission’s Rules of Practice and Procedure, intervenor California Emerging Technology Fund (“CETF”) hereby provides its Intervenor Testimony, consisting of the Opening Testimony of CETF President and CEO Sunne Wright McPeak, attached as **Exhibit 1**, to the parties in the proceeding. **Attachment A** to the Opening Testimony is a proposed agreement in principle with the four Investor-Owned Utilities (“IOUs”) which are Applicants in this proceeding. CETF and the four IOUs have come to an agreement to extend their existing agreement relating to CETF providing information about affordable broadband offers and LifeLine offers to IOU customers who receive Low Income and Income Assistance Program information for the Bridge time period.

CETF is a non-profit organization formed by this Commission with a mission of closing the Digital Divide in California. Its interests in this proceeding are (1) to increase low-income customers’ access to affordable broadband offers to enable them to better access IOU online billing and energy programs that have online components (application, outreach, data), and (2) to

receive faster emergency communications about a Public Safety Power Shutoff or other emergencies from a utility.

Respectfully submitted,

*/s/ Rachelle Chong*

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**EXHIBIT 1**

**OPENING TESTIMONY OF  
WITNESS SUNNE WRIGHT MCPEAK**

1 **Application:** A.22-06-022, A. 22-06-023, A.22-06-025  
2 **Exhibit No.**  
3 **Date:** November 21, 2025  
4 **Witness:** Sunne Wright McPeak

5 **EXHIBIT 1**  
6 **OPENING TESTIMONY OF SUNNE WRIGHT MCPEAK**  
7 **PRESIDENT AND CEO**  
8 **CALIFORNIA EMERGING TECHNOLOGY FUND**

9 **I. Background.**

- 10  
11 1. My name is Sunne Wright McPeak. Since 2006, I have been the President and CEO  
12 of the California Emerging Technology Fund (“CETF”). I supervise and direct all  
13 public policy efforts by CETF at the California Public Utilities Commission (“CPUC”  
14 or “Commission”). CETF is a non-profit organization established by this Commission  
15 in 2006 with the mission to close the Digital Divide in California. Under my  
16 leadership, CETF has 19 years of experience in broadband infrastructure and  
17 broadband adoption (Digital Equity and Inclusion) experience in California. CETF  
18 regularly appears before this Commission in proceedings relating to corporate  
19 communications mergers, making recommendations based on our expertise on behalf  
20 of broadband consumers. In these merger proceedings, CETF recommends that all  
21 corporate consolidations be reviewed to ensure that there are public benefits that are  
22 “appropriate, fair and comparable” to prior mergers where applicants voluntarily have  
23 provided a variety of public benefits, such as upgraded broadband infrastructure,  
24 voluntary commitments to affordable broadband rates, and free or low-cost e-devices  
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1 for low-income households, free public Wi-Fi hotspots, and funding broadband  
2 adoption programs for Digital Inclusion of disadvantaged communities in the state.  
3 CETF also has been a party in proceedings relating to Commission programs bearing  
4 on broadband issues, including the California Advanced Services Fund grant program,  
5 other broadband grant programs, and the LifeLine rulemaking. In the latter LifeLine  
6 rulemaking, the Commission has introduced a new LifeLine Home Broadband Pilot  
7 Program for three years to provide low-income households with the ability to obtain  
8 broadband at a discounted rate from Internet service providers who choose to  
9 participate. Representing CETF, I sit on the California Broadband Council as the only  
10 non-State agency representative. The California Broadband Council was established  
11 by Senate Bill 1462 to promote broadband deployment in unserved and underserved  
12 areas of the state as defined by the Public Utilities Commission, and broadband  
13 adoption throughout the state. The CBC identifies state resources, encourages public  
14 and private partnerships and recommends strategic policy to establish effective  
15 structures for providing world-class, high-speed Internet access through California.  
16 The twelve-member CBC is run by the California Department of Technology which  
17 provides support to manage the statewide ecosystem of agencies, organizations and  
18 individuals dedicated to closing the Digital Divide.

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22 2. Prior to my CETF position, I served three years as the Secretary of the California  
23 Business, Housing and Transportation Agency. Before that, I served seven years as  
24 the President and CEO of the Bay Area Council, a major employer-led policy  
25 organization, addressing regional economic prosperity issues. For three years prior, I  
26 was President and CEO of the Bay Area Economic Forum, a public private partnership

1 between the Bay Area Council and the Association of Bay Area Governments. Prior  
2 to that, I served more than fifteen years as a member of the Contra Costa County  
3 Board of Supervisors.  
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5 **II. CETF's Past Participation in the Prior CARE, ESA, FERA Proceeding.**  
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- 7 3. On April 25, 2025, CETF filed a Motion requesting party status in this proceeding,  
8 stating it wished to provide comment on the continuation of its existing programs with  
9 the four Investor-Owned Utilities ("IOUs") who are applicants in this proceeding,  
10 Southern California Gas Company, San Diego Gas and Electric Company, Pacific Gas  
11 & Electric Company, and Southern California Edison (collectively "IOU Applicants").  
12 The IOU Applicants distribute short educational messages on electric bills, on  
13 applicants' websites directed towards low-income households and consumers, and in  
14 education kits relating to their income assistance energy programs. CETF seeks to  
15 continue to partner with the IOU Applicants to have them include brief educational  
16 messages about affordable broadband offers and LifeLine offers to the same low-  
17 income households.  
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- 19 4. As background, from 2015 until 2019, CETF approached the IOU Applicants about a  
20 partnership of providing affordable broadband and LifeLine information with the  
21 CARE, ESA and FERA income assistance information, but was informed that the  
22 IOUs were not allowed to use any electric ratepayer funds on a non-electric issue.  
23 CETF then intervened as a party in A.19-11-003 and related matters. In that  
24 proceeding, CETF engaged in over a year of advocacy to request that the IOU  
25 Applicants include information to low-income households about affordable broadband  
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1 offers and LifeLine low-income plans for telecommunications services along with the  
2 IOU's CARE, ESA and Family Electric Rate Assistance Program ("FERA") assistance  
3 program information, using the IOUs' marketing and communications channels and  
4 their income assistance website pages. CETF was pleased to enter into a Joint  
5 Stipulation with the IOU Applicants to achieve this partnership, which was approved  
6 by the Commission in D.21-06-015. At Section 10.11.7 of Decision No. 21-06-015,  
7 the decision directs the four IOUs to coordinate cross-promotion of the LifeLine and  
8 affordable broadband programs with current ESA, CARE and FERA marketing  
9 efforts. Attachment 6 of the same decision includes the Joint Stipulation agreement,  
10 dated November 11, 2020, between CETF and the IOU Applicants.  
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14 **III. CETF Has Reached An Agreement in Principle with the IOU Applicants  
to Extend the Joint Stipulation with Minor Amendments.**

- 15 5. In this proceeding, CETF has intervened to respectfully request that the four IOU  
16 Applicants continue our successful partnership of advertising affordable broadband  
17 and LifeLine offers during the bridge funding year of 2027. CETF is pleased to report  
18 that it has held a meeting with the IOU Applicants, and we have an agreement in  
19 principle to extend the Joint Stipulation with very minor amendments during the  
20 Bridge Year. **Attachment A** is a copy of the draft Amended Joint Stipulation between  
21 CETF and IOU Applicants which we provide for comment by parties.<sup>1</sup> CETF and the  
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<sup>1</sup> CETF and the IOU Applicants have circulated two versions of this extension of the Joint Stipulation. While it is not in final form, CETF believes there is only one minor issue relating to data reporting that remains at issue.  
EXHIBIT 1 TESTIMONY OF SUNNE WRIGHT MCPEAK CETF - 4



1 IOU Applicants emphasize that no costs are being born by electric ratepayers for this  
2 Joint Stipulation.

- 3 6. In summary, CETF and the IOU Applicants agreed to extend the prior Joint  
4 Stipulation with very minor changes. CETF will continue to have the ability to  
5 provide limited messaging about affordable broadband offers and the new LifeLine  
6 Home Broadband Pilot Program through the IOU's educational channels relating to  
7 their low-income and income assistance programs. CETF bears all the costs of  
8 preparation and production of any such materials. The IOUs do not accrue any costs  
9 of this broadband-related activity, except for nominal costs of their personnel who  
10 administrate the CARE, ESA and FERA programs. CETF directs incoming calls by  
11 interested electric customers to the CETF's "Get Connected" Call Center, which  
12 provides information to callers about affordable broadband offers and LifeLine offers  
13 in their service area, and further refers them to CETF's trained Community-Based  
14 Organization ("CBO") Network. This CBO Network assists interested customers in  
15 enrolling in low-income broadband offers or the LifeLine program and further directs  
16 them to sources of low-cost computing devices. CETF bears all the costs its Call  
17 Center and operation for the CBO network.  
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22 **IV. The Issue of CETF and These Broadband-Related Activities Is Within the**  
23 **Scoped Issues in this Proceeding.**

- 24 7. In the "Administrative Law Judge's Ruling Presenting Draft List of Scoping Issue and  
25 Schedule for Consideration Prior to Prehearing Conference," dated August 14, 2025  
26 (the "Scoping Memo"), the Assigned ALJ found that the following issue is within the  
scope of this proceeding:

1 “3.d. Should the 2027 CARE-ESA-FERA program budgets continue to fund the Joint  
2 Stipulation with the California Emerging Technology Fund for affordable broadband  
3 support activities? At what amount?”

4 Thus, CETF’s issue is squarely within the scoping issues of this proceeding.

5 **V. There is Still a Need for Information about Broadband Affordable Offers**  
6 **and the New LifeLine Home Broadband Pilot Program Information to Be**  
7 **Distributed to Unconnected and Underconnected Low Income Households**  
8 **for Digital Equity Purposes.**

- 9 8. The purpose of this portion of my testimony is to provide data that there is still an  
10 important need to share the broadband affordable offer information with low-income  
11 households who are unconnected to the Internet or “underconnected,” which I define  
12 as connected to the Internet only by a smartphone. Underconnected households lack  
13 adequate digital tools for the full range of digital activities such as education and  
14 employment. For example, a student cannot write a term paper on a smartphone.  
15 CETF’s latest 2023 Statewide Digital Equity Survey (“2023 Survey”) provides data  
16 that reveals that the top reason why households are not connected to the Internet is  
17 cost. Over a third of respondents (36%) stated that home broadband service is too  
18 expensive for them.<sup>2</sup> When they cannot connect at home, they state that they must use  
19 broadband in other locations, such as restaurants, cafes, the homes of friends or  
20 relatives, libraries, schools, their workplace, at a public space, using community WiFi,  
21 or at a parking lot of a school or library.<sup>3</sup>

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26 <sup>2</sup> CETF 2023 Statewide Digital Equity Survey, Final Report, August 31, 2023 (“2023 Survey”), conducted by the  
University of Southern California, Annenberg School of Communications and Journalism, at p. 37.

<https://www.cetfund.org/action-and-results/statewide-surveys/2023-statewide-survey/>

<sup>3</sup> 2023 Survey, at p. 38.

1 9. Further the 2023 Survey finds a strong correlation between household income and  
2 broadband adoption. Two federally funded programs to provide discounted broadband  
3 plans to low- and middle-income households occurred due to the COVID-19 pandemic  
4 period. These programs created a strong demand for home Internet connectivity due  
5 to governmental stay-at-home orders. Due to the federal Emergency Broadband  
6 Benefit program in 2021 which was replaced by the Affordable Connectivity Program  
7 (“ACP”) in 2022, adoption among lower income groups rose steeply among the lowest  
8 income bracket (below \$20,000 annual household income) from 70% in 2021 to 85%  
9 in 2023. This adoption gain among the poorest households indicates the presence of  
10 strong demand for broadband services that are affordable and accessible for this  
11 income group.<sup>4</sup> However, the ACP program terminated in June 2024 due to lack of  
12 Congressional funding and has not been renewed. Thus, I would expect that the  
13 broadband adoption rate for the lower income groups will fall again in our next  
14 Statewide Digital Equity survey.  
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17 10. The 2023 Statewide Survey also revealed that only 12% of survey respondents had  
18 heard of the ACP program and only 5% had heard of the Lifeline program.<sup>5</sup> For those  
19 who had heard of ACP or other broadband discount programs and are identified as  
20 eligible but not enrolled, the Survey asked why they had not enrolled. 29% stated they  
21 would probably not qualify although it appeared they would qualify based on annual  
22 household income alone or participation in qualifying programs. These results  
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<sup>4</sup> 2023 Survey, at p. 19.

<sup>5</sup> 2023 Survey, at p. 43.

1 indicate that program awareness is not enough to increase enrollment but local  
2 outreach efforts must educate potential participants on eligibility and assist them in the  
3 enrollment process.<sup>6</sup> This is why CETF created and funds its Get Connected Call  
4 Center to take calls from those interested in affordable broadband offers, assist them in  
5 enrollment to such programs, and refer them to sources for affordable computing  
6 devices. As part of our agreement, CETF provides the telephone number and website  
7 link to its Internet for All website (<https://www.internetforallnow.org/>) to the IOU  
8 Applicants to share with their program messaging relating to their CARE, ESA and  
9 FERA programs.  
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11 11. Finally, it is in the financial interest of the IOU Applicants to get all of their customers  
12 online to save significant operational costs, such postage and mailing costs related to  
13 billing, achieve State energy efficiency and environmental protection goals, to  
14 promote equity of access to its programs for disadvantaged communities that are not  
15 online, and to have an electronic means (e.g. Email) to communicate to a customer  
16 about an impending Public Safety Power Shutoff or other emergency situation such as  
17 an approaching wildfire and evacuation routes.  
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19 12. In our extension agreement, CETF is seeking to update some important data about  
20 how many CARE customers of the IOUs have email addresses and are therefore  
21 connected to the Internet. This is an important data point for CETF as it sets a  
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<sup>6</sup> 2023 Statewide Survey, at p. 44.

baseline for progress. In 2018, the IOUs provided the following data to Assembly  
Chairman of the Committee on Utilities and Energy Chris Holden:

<b>IOU CARE Customers</b>	<b>PG&amp;E</b>	<b>SCE</b>	<b>SDG&amp;E</b>	<b>SoCalGas</b>
IOU Total CARE Customers	1,406,799	1,227,268	282,388	1,557,184
CARE Customers with Email Addresses	488,752	455,807	197,672	761,709
% CARE Customers Online with IOU	35%	36%	70%	49%

The 2018 data provided to Assemblymember Holden shows that most IOUs had a long way to go to get more of their customers online. CETF is seeking to update this seven-year-old data in this new agreement so we can measure progress and set a new baseline.

**VI. The Governor’s Executive Order No. N-23-70 Emphasizes Bringing Broadband to All, which Remains the Goal Post-Pandemic.**

13. On August 14, 2020, Governor Gavin Newsom issued Executive Order N-23-70<sup>7</sup> which emphasizes the urgent importance of bringing broadband to all in the COVID-19 emergency. In this Executive Order, the Governor stated that:

- “broadband access, adoption, and training are essential components of digital equity for California’s diverse populations”

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<sup>7</sup> <https://www.gov.ca.gov/wp-content/uploads/2020/08/8.14.20O-N-73-20-text.pdf>

- “deploying affordable and reliable broadband networks throughout California will accelerate continuous improvements in economic and workforce development, infrastructure, public safety, education, economy and an engaged citizenry”
- “the COVID-19 pandemic has amplified the extent to which broadband is essential for public safety, public health and economic resilience,” and
- “effective emergency services require using broadband infrastructure to integrate data in real time from all available sources so decision makers at the local, regional and statewide level have access to the information necessary for the protection of lives and property.”

Notably, the Executive Order directs GO-Biz “to coordinate the outreach efforts of existing programs and institutions to inform residents of affordable Internet service offerings, including:

- a. The CPUC is requested to develop tools for low-income individuals and social service organizations to easily identify and subscribe to affordable broadband plans; and*
- b. The California Emerging Technology [F]und is directed to continue promoting affordable home Internet offers to recipients of the National School Lunch Program. . . “<sup>8</sup>*

14. In my view, the Governor’s Executive Order underscores the urgency of the task of State Agencies, including the CPUC, to connect unconnected residents to affordable broadband plans, particularly for low-income persons and those living in

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<sup>8</sup> In addition, the California State Library, the California Department of Education and the California Department of Aging are directed to lead efforts to bring affordable Internet access to local library patrons, to students for distance online learning from home, and for seniors to get connected to the Internet.

1 disadvantaged communities, (such as those residing in public housing, immigrants,  
2 non-English speaking, migrant farm workers, Tribal nations, and seniors).  
3 Specifically, the Governor has directed the CPUC to “develop tools for low-income  
4 individuals and social service organizations to easily identify and subscribe to  
5 affordable broadband plans.” Even now that the COVID-19 pandemic emergency has  
6 eased, the need remains for broadband connectivity for all, given an Internet is an  
7 essential tool for 21<sup>st</sup> Century society. One needs access to the Internet to apply for  
8 jobs and for college, to participate in Internet-enabled homework, telehealth  
9 applications, and obtain many critical governmental services.  
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12 **VII. The Utilities are Trusted Messengers of Affordable Broadband Offer**  
13 **Information.**

14 15. CETF is appreciative of the IOU Applicants’ sincere partnership under the existing  
15 Joint Stipulation and looks forward to our continuing partnership in the Bridge period.  
16 CETF has found that the utilities are “trusted messengers” of affordable broadband  
17 information to their customers. This is very important as CETF attempts to reach the  
18 last remaining unconnected households in the State to educate them on affordable  
19 offers and the benefits of being connected. CETF is grateful for the IOU Applicants’  
20 agreement to continue the Joint Stipulation, as amended, for the Bridge Year, and  
21 urges this Commission to approve our amended Joint Stipulation once finalized.  
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1 16. Consistent with Rule 1.1, I represent that I am authorized to offer this testimony on  
2 behalf of CETF, and that the statements in the foregoing testimony are true of my own  
3 knowledge, except as to matters which are therein stated on information or belief, and  
4 as to those matters I believe them to be true.

5 17. This concludes my testimony.  
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# **ATTACHMENT A**

# DRAFT

**Energy Savings Assistance and California Alternate Rates for Energy**

**Programs and Budgets for 2021-2027 Program Years**

**(Applications 25-06-023, A. 25-06-024,  
A.25-06-025, and related matters)**

**Joint Stipulation – 01: Affordable Internet Education and Outreach**

**California Emerging Technology Fund (CETF), Pacific Gas & Electric  
Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern  
California Edison Company (SCE), and Southern California Gas Company  
(SoCalGas)**

**Witnesses: Sunne McPeak (CETF), Erik Olsen (PG&E), Roland Mollen IV  
(SDG&E), John Nham (SCE), and Octavio Verduzco (SoCalGas)**

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## **Joint Stipulation - Affordable Broadband Internet Education and Outreach**

### **CETF, PG&E, SCE, SDG&E, and SoCalGas**

CETF was the only party to propose a requirement for affordable broadband offer education and outreach in A.19-11-003, et al. On August 25, 2025, CETF filed a Motion for Party Status in A.25-06-022, which was granted in an Administrative Law Judge Ruling dated September 24, 2025. Southern California Gas Company (“SoCalGas”), San Diego Gas and Electric Company (“SDG&E”), Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), and California Emerging Technology Fund (“CETF”) (collectively, the “Parties”) respectfully submit this Joint Stipulation in the above-referenced proceeding.

On September 30, 2020, the Parties met via teleconference. The Parties worked collaboratively to reach consensus on the affordable broadband offer education and outreach issue scoped within the proceeding.<sup>1</sup> The Parties believe this compromise outcome is reasonable considering the entire record in this proceeding and reflects a fair and balanced compromise of the Parties’ proposals. Accordingly, the Parties agreed a Joint Stipulation in A.19-11-003, et. al. for the 2021- 2026 program year. The Commission adopted the Joint Stipulation in D.21-06-015.

On June 27, 2025, the IOUs each filed and served their respective bridge funding applications for 2027. On August 29, 2025, the Administrative Law Judge issued a Ruling Directing Additional Testimony to be Served by Applicants regarding the Joint Stipulation. On September 17, 2025, the Assigned Commissioner issued a Scoping Memo and Ruling. On October 6, 2025, the IOUs each served Supplemental Testimony regarding the Joint Stipulation and that any agreement would be included in CETF’s upcoming intervenor testimony due on November 21, 2025. On October 21, 2025, Parties met to discuss CETF’s proposed

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<sup>1</sup> Assigned Commissioner’s Scoping Memo and Ruling, Issue Y, at p. 6.

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modifications to the Joint Stipulation.

Based on that discussion, Parties recommend the following, in lieu of litigating these issues:

1. Affordable Broadband Marketing, Education and Outreach:

The Joint Investor Owned Utilities<sup>2</sup> (“IOUs”) will, for A.19-11-003, et al, program years 2021 through Bridge Year 2027:

- a. Add a specifically assigned telephone number for each IOU for call tracking purpose and a web link designated by CETF<sup>3</sup> to a relevant location on each IOU’s respective company website.<sup>4</sup> A “relevant” location may include, in the sole discretion of each IOU, the respective CARE, FERA, ESA, or general income-qualified assistance webpage of each IOU. The Joint IOUs will retain control over their respective websites, designs, and messaging. CETF and the IOUs each agree to meet quarterly each year of the 2021-2027 program cycle.
- b. Integrate broadband affordable offer and LifeLine Home Broadband Pilot Program (“LifeLine Home Broadband Pilot”) messaging twice annually in select existing CARE, Family Electric Rate Assistance (“FERA”) and/or ESA direct marketing materials as determined in the sole discretion of each IOU. In addition, at the discretion of the IOUs, examples of direct marketing materials may include email, direct mail (e.g. postcard), bill inserts or onserts, and CETF-provided customized electronic templates of materials regarding affordable internet and LifeLine Home Broadband Pilot offers for distribution through existing media

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<sup>2</sup> PG&E, SDG&E, SCE, and SoCalGas.

<sup>3</sup> For example, for the 2025-2026 time era, CETF designates this Get Connected web link: <https://www.internetforallnow.org/>

<sup>4</sup> The purpose of the IOU-specific telephone number assigned by CETF is to track the number of low-income consumers that call in to the CETF “Get Connected” Call Center to gain assistance in locating affordable broadband offers and LifeLine services in their geographic areas, obtain assistance to sign up, and obtain screening for free Digital Literacy training.

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channels, such as websites, texting, social media posts, community and ethnic media channels, and community resource guides. Where feasible, the messaging shall consist of approximately 1-2 lines of text within a given piece of marketing material. The IOUs are not required to include separate or stand-alone broadband affordable or Lifeline Home Broadband Pilot offer messaging with their direct marketing materials. Each IOU will determine the most appropriate strategy to integrate broadband/LifeLine Home Broadband Pilot message placement and prominence in a given piece of marketing material. At the discretion of each IOU, an IOU may choose to provide CETF with a calendar of planned promotional efforts to support CETF's resource planning. There is no expectation that each IOU have the same amount or scope of direct marketing. Integrating broadband messaging in IOU marketing material assumes this specific work will be done at minimal or no cost to the ratepayer. IOUs retain sole discretion in determining whether any incremental costs associated with printing or mailing can be absorbed by CARE/FERA/ESA Program marketing dollars to subsidize costs.

- c. Incorporate CETF affordable broadband and LifeLine Home Broadband Pilot materials in ESA Program education kits. The CETF materials shall be developed, funded, and provided by CETF. The IOUs' respective ESA Program contractors will have no expectation of answering questions or educating customers on issues related to affordable broadband or LifeLine Home Broadband Pilot offers or eligibility criteria. ESA Program contractors may refer a customer to the CETF materials and contact information should such questions arise. Once a year, CETF may conduct an orientation, briefing and/or trainings at ESA contractor workshops to educate any employees, contractors and Community-Based Organizations ("CBO") working on

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the IOUs' income-qualified assistance programs on the broadband/LifeLine Pilot materials. CETF shall provide all the trainers and materials for these training courses at no cost to the IOUs.

- d. Help educate Community-Based Organizations ("CBO") by inviting CETF to speak and present at a minimum of one CBO training workshop or Marketing Education & Outreach ("ME&O") meeting annually. Once connected to the network of CBOs, CETF may (1) coordinate with CBOs directly to provide CETF-created and CETF-funded marketing materials for CBO distribution to assistance recipients (e.g., handouts at food banks, etc.), and (2) collaborate with CETF-identified Digital Inclusion CBOs. Except for the IOU/CBO ME&O event collaboration, all other CBO coordination should be considered outside of the IOU's purview to manage, mediate, and organize, and outside any IOU-CBO contract activity. Joint IOUs assume no responsibility or liability for any act or failure to act of any CBO in any relationship that may be formed between a CBO and CETF.
- e. Once a year within the low-income program annual report filing, each IOU will provide the number of CARE customers and how many of those CARE customers have emails on file. Also, once a year within the income-qualified program annual report filing, each IOU will provide a list of activities pursued by the IOU under this Agreement.
- f. CETF and each IOU agree to hold a quarterly meeting with appropriate program staff to review performance data, and confer and collaborate on additional strategies to get income-qualified assistance program customers online for the goal of closing the Digital Divide. CETF agrees to designate a lead point of contact for the IOUs to ensure effective coordination.

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## 2. Costs:

- a. As a condition precedent to the IOUs' obligation to comply with Sections 1a through 1f above, the IOUs will require Commission approval of this Joint Stipulation. The IOUs' respectively have pending requests for marketing, education, and outreach (ME&O) budgets for CARE, ESA and FERA activities for the PY 2021-2027 cycle. The IOUs' request Commission authorization to access and use these ME&O approved budgets in the 2021-2027 cycle to subsidize the minimal costs for certain tasks detailed in this Joint Stipulation. These certain tasks include, but are not limited to, sorting materials, distribution, postage, internal labor to coordinate marketing and website design, and costs associated with assembling ESA Program educational kits.
- b. As noted in Section 1.b. above, the IOUs anticipate that integrating broadband and LifeLine Home Broadband Pilot affordable offer messaging into their direct marketing materials can be accomplished at minimal or no cost to the ratepayer. However, to the extent that minimal costs for these activities exist, the Parties agree to incorporate such broadband offer marketing messages into existing marketing materials in compliance with this Joint Stipulation and at the sole discretion of each IOU.

## 3. Procedural Matters

- a. This Joint Stipulation is subject to and requires Commission approval, including to authorize the IOUs to use CARE/FERA/ESA dollars for affordable broadband offer marketing pursuant to Section 2 above.
- b. This Joint Stipulation will remove further affordable broadband matters from this proceeding (A.19-11-003, et al.) and IOUs' respective bridge funding proceeding

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(A.25-06-023, A.25-06.024, and A. 25-06-025, et al). Any ongoing discussions regarding further affordable broadband matters should take place elsewhere in other Commission broadband dockets.

- c. Each IOU will exercise independent judgment and discretion in determining the most appropriate means for implementing the agreements in this Stipulation.
- d. The Parties agree to exchange point of contact information with each other regarding implementation of this Joint Stipulation.
- e. This Joint Stipulation does not constitute and should not be used as a precedent regarding any principle or issue in this proceeding or in any future proceeding.
- f. The Parties agree that this Joint Stipulation is reasonable considering the testimony submitted in A.19-11-003, consistent with law, and in the public interest.
- g. This Joint Stipulation may be amended or changed only by a written agreement signed by the Parties.
- h. Nothing in this Joint Stipulation shall have the effect of diluting the Joint IOUs' messaging for their respective income-qualified programs.

#### 4. Conclusion

The Joint Parties confirm that representatives of the Joint Parties have authorization to submit this Joint Stipulation on behalf of their respective organization.

This concludes the Joint Stipulation.



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