CPUC Docket: A.26-01-003 et al.
Exhibit Number: TURN-12
Date: November 25, 2026

A.26-01-003 et al.

Ex. TURN-12

TURN Data Request TURN-PG&E-012 and PG&E Response

A.26-01-003 et al. – Income Qualified Programs Application for Years 2028-2033
TURN Data Request TURN-PG&E-012

To:	Jennifer C. Reyes Lagunero <Jennifer.ReyesLagunero@pge.com>, Mary Kenaston <Mary.Kenaston@pge.com>, Amanda Sweetman <Amanda.Sweetman@pge.com>, Katie Foley <Katherine.Foley@pge.com>
Date Sent:	November 17, 2026
Response Due:	November 24, 2026 (expedited response)
Subject:	IQP enrollment strategies

Please provide electronic responses to the following questions. A hard copy response is unnecessary unless electronic versions are unavailable. The responses should be provided as attachments sent by e-mail to the following people:

Reina Yanagiba
The Utility Reform Network (TURN)
360 Grand Ave., #150
Oakland, CA 94610
ryanagiba@turn.org

Julia de Lamare
The Utility Reform Network (TURN)
360 Grand Ave., #150
Oakland, CA 94610
jdelamare@turn.org

Hayley Goodson
The Utility Reform Network (TURN)
360 Grand Ave., #150
Oakland, CA 94610
hayley@turn.org

Sylvie Ashford
The Utility Reform Network (TURN)
360 Grand Ave., #150
Oakland, CA 94610
sashford@turn.org

Instructions:

The following questions pertain to **A.26-01-003 et al.**

For each question, please provide the name of each person who materially contributed to the preparation of the response. If different, please also identify the PG&E witness who would be prepared to respond to cross-examination questions regarding the response.

For any questions requesting numerical recorded data, ***please provide all responses in machine-readable format, with cells and formulae functioning***.

For any question requesting documents, please interpret the term broadly to include any and all hard copy or electronic documents or records in PG&E's possession.

Finally, if partial responses are available prior to the requested due date, please forward them as soon as they become available. If any of these requests are unclear or otherwise objectionable, please contact Julia de Lamare as soon as possible so that we may attempt to resolve any problems.

Question 1: Please find attached the workshop notice and slides used at the 2026 Income-Qualified and Clean Energy Programs Workshop, held by PG&E, SCE, SDG&E, and SoCalGas on November 5, 2026. Did PG&E consider any of the information and data included in the workshop slides in preparing its IQP proposals in this proceeding?

NOTICE OF JOINT UTILITIES' INCOME-QUALIFIED AND CLEAN ENERGY PROGRAMS WORKSHOP

To All Parties on the Service Lists A.19-11-003, A.25-06-022, A.26-01-003, R.14-07-002, R.13-11-005, R.13-09-011, and R.20-05-012

(Due to the volume of email addresses, this notice will be served in multiple emails.)

Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison (SCE), and Southern California Gas Company (SoCalGas) will hold a public Income-Qualified and Clean Energy Programs Workshop to connect, collaborate, and improve program coordination for the benefit of households and communities the programs are intended to serve.

With approximately 3,000 electric and gas utilities across the country, there are a variety of case studies to learn from in terms of public-private collaboration and program participation. This workshop will explore select efforts with income-qualified and clean energy programs and consider applications for California. Themes will include government partnerships, mechanisms that enable data sharing, customer privacy, and approaches to income verification. Audience participation is encouraged both virtually and in-person during Q&A portions of the workshop.

Workshop Objectives

- Showcase select examples of data sharing that facilitate and improve customer enrollment.
- Share program enrollment strategies.
- Discuss these examples, strategies, and applications.
- Identify opportunities to increase customer enrollment in income-qualified and clean energy programs.
- Create connections and foster opportunities for relationship development and networking across California's income-qualified and clean energy program community.

Discussion will focus on programs administered by Avista Utilities, Public Service Electric and Gas Company (PSE&G New Jersey/NJ), Sacramento Municipal Utility District (SMUD), and Seattle City Light. Please see the speaker bios on the PDA site for more information on these utilities and programs. These are peer programs to the four main California investor-owned utilities' (IOUs) income-qualified and clean energy programs, specifically the Energy Savings Assistance (ESA), California Alternate Rates for Energy (CARE), and Family Electric Rate Assistance (FERA) programs.

Workshop Information

Date	Thursday, November 5, 2026
Time	9:30 AM to 12:30 PM PT
Location	Microsoft Teams and In-person at PG&E's Oakland General Office
Webinar and Teleconference Information	Microsoft Teams link: click to join the meeting now Meeting ID: 263 892 051 885 915 Passcode: 5Fx9t4wN Dial in by phone: +1 415-906-0873 Phone conference ID: 660 301 372#

This hybrid event will take place on Thursday, November 5, 2026, from 9:30 AM to 12:30 PM PT. To attend virtually, registration is not required and please use the Microsoft Teams information above. Registration is required for in-person attendance, which is limited. Please register here. The final meeting materials, including presentations and agenda (see p. 3), will be posted to the PDA site in advance of the workshop.

Please contact Mike Atoria with any questions: mike.atoria@pge.com.

Agenda: 2026 Income-Qualified and Clean Energy Programs Workshop
Updated 9/28/26 (may be subject to minor changes/updates)

Time	Session	Topic	Speaker
9:30 AM – 9:40 AM PT	Welcome	Safety/Room Information	PG&E Facilitated
		Welcome and Intro to Commissioner	Marlene Murphy-Roach, Senior Director, Customer Programs, PG&E
		Opening Remarks	Commissioner Matthew Baker, California Public Utilities Commission
9:40 AM – 10:40 AM PT	Session 1: California Context for Data Sharing	Income-Qualified Programs Overview	Jenny Wu, Principal Regulatory Policy Analyst, PG&E
		Data Protection Laws and Principles	Vivian Kim, Senior Counsel – AI, Customer Care, Cybersecurity, Privacy, PG&E
		SMUD: A Case Study	Tara Porter, Director, Customer Operations & Assistance, SMUD
		Q&A and Discussion	IOU Facilitated
10:40 AM – 11:00 AM PT	Break	In-person Networking	
11:00 AM – 12:20 PM PT	Session 2: Making it Easier for Customers – Government Partnerships, Legislative Directives, and Income Verification Strategies	Seattle City Light: Partnering with Affordable Housing Authorities	Melissa Bookwalter, Financial Assistance Portfolio Manager, Seattle City Light Jessica Kenyon, Customer Experience Data Analytics Manager, Seattle City Light
		PSEG NJ: Legislation to Enable Cross-Program Collaboration	Gerald Reiner, Energy Efficiency Program Support Manager, PSEG NJ
		Avista: Community Action Agencies and Income Verification	Mikaela Terpko, Senior Energy Program Manager, Avista
		Q&A and Discussion	IOU Facilitated
12:20 PM – 12:30 PM PT	Closing	Interactive Poll	PG&E Facilitated
		Closing Remarks	PG&E Facilitated

Welcome!

We will begin at 9:30 AM PST.









2026 Income-Qualified and Clean Energy Programs Workshop

November 5, 2026

Pacific Gas and Electric Company

Southern California Edison
Energy for What's Ahead

SDGE

SoCalGas

Safety Information

IN CASE OF AN EARTHQUAKE



DUCK



COVER



HOLD

IN CASE OF AN ACTIVE SHOOTER



GET OUT



HIDE OUT



TAKE OUT

EMERGENCY ASSIGNMENTS	
Building Address	**Location/Room**
300 Lakeside Drive Oakland, CA 94612	First Floor Conference Center
Act as Incident Lead	**Lead CPR**
Mike Atoria, PG&E	Jack Pilutti, PG&E
Call for Emergency Assistance: 911	**Sweep Room/Area**
Erik Olsen, PG&E	Iris Cheung, PG&E
Evacuation and Assembly Point	**Get AED/First Aid Kit**
325 22nd Street Parking Lot between 21st and 22nd Street	Steven Walther, PG&E
Meet Emergency Services	**Nearest Hospital**
Jimmy Yeh, PG&E	Alta Bates Summit Medical Center 350 Hawthorne Ave, Oakland, CA 94609

Event Reminders

Questions or support needed?

Ask a PG&E coworker or support staff! (in-person participants)

Housekeeping

- Step outside for phone calls or laptop work (in-person attendees)
- Please utilize the Q&A feature for all virtual audience questions
- Restrooms are located in the adjacent room toward the back
- Wi-Fi Name: GECO
  Wi-Fi Password: 20881796

Agenda – Thursday, November 5, 2026

Time	Topic
9:30 – 9:35 a.m.	Introduction; In Room Safety; Welcome
9:35 – 9:40 a.m.	Opening Remarks
9:40 – 10:40 a.m.	Session 1: California Context for Data Sharing
10:40 – 11:00 a.m.	Break and In-Person Networking
11:00 – 12:20 p.m.	Session 2: Making it Easier for Customers – Government Partnerships, Legislative Directives and Income Verification Strategies
12:20 – 12:30 p.m.	Closing Remarks

Welcome



Marlene Murphy-Roach

PG&E | Senior Director, Customer Programs

Opening Remarks



Matthew Baker

Commissioner | California Public Utilities Commission

Making Program Enrollment Easier for Income-Qualified Customers

Background

PG&E has long-standing programs supporting customers with household income at or below 250% of the Federal Poverty Level (FPL)

CARE

- California Alternate Rates for Energy Program
- Monthly gas and electric bill discount
- Up to 200% FPL
- Established in 1989

FERA

- Family Electric Rate Assistance Program
- Monthly electric bill discount
- 200% FPL + $1 to 250% FPL
- Established in 2004

ESA

- Energy Savings Assistance Program
- Energy efficiency and weatherization direct install
- Up to 250 FPL%
- Established in 1983

In 2025, over 1.4 million households received monthly bill discounts through CARE and FERA, while more than 50,000 homes received energy-saving improvements through ESA.

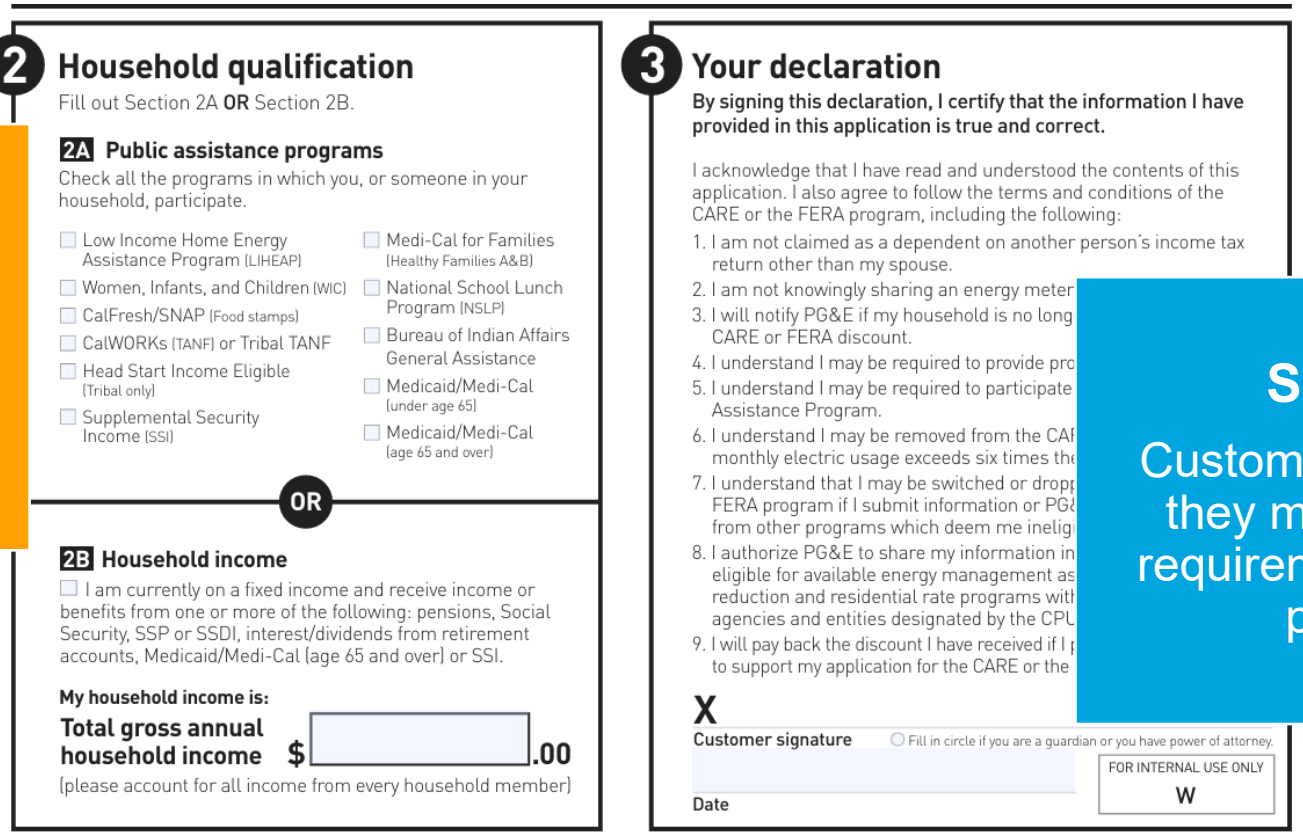
Ways to Making Enrollment Easier: Simplified Application

Self-Attestation and Categorical Eligibility Simplify Enrollment

No upfront eligibility documentation. No household income calculations..

Categorical Eligibility

Customers can self-attest that their household participates in one or more public assistance programs accepted by the program.



2 Household qualification

Fill out Section 2A **OR** Section 2B.

2A Public assistance programs

Check all the programs in which you, or someone in your household, participate.

- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ Women, Infants, and Children (WIC)
- ☐ CalFresh/SNAP (Food stamps)
- ☐ CalWORKs (TANF) or Tribal TANF
- ☐ Head Start Income Eligible (Tribal only)
- ☐ Supplemental Security Income (SSI)
- ☐ Medi-Cal for Families (Healthy Families A&B)
- ☐ National School Lunch Program (NSLP)
- ☐ Bureau of Indian Affairs General Assistance
- ☐ Medicaid/Medi-Cal (under age 65)
- ☐ Medicaid/Medi-Cal (age 65 and over)

OR

2B Household income

☐ I am currently on a fixed income and receive income or benefits from one or more of the following: pensions, Social Security, SSP or SSDI, interest/dividends from retirement accounts, Medicaid/Medi-Cal (age 65 and over) or SSI.

My household income is:

Total gross annual household income $ _____ .00

(please account for all income from every household member)

3 Your declaration

By signing this declaration, I certify that the information I have provided in this application is true and correct.

I acknowledge that I have read and understood the contents of this application. I also agree to follow the terms and conditions of the CARE or the FERA program, including the following:

1. I am not claimed as a dependent on another person's income tax return other than my spouse.
2. I am not knowingly sharing an energy meter
3. I will notify PG&E if my household is no long CARE or FERA discount.
4. I understand I may be required to provide pro
5. I understand I may be required to participate Assistance Program.
6. I understand I may be removed from the CA monthly electric usage exceeds six times th
7. I understand that I may be switched or drop FERA program if I submit information or PG from other programs which deem me inelig
8. I authorize PG&E to share my information in eligible for available energy management as reduction and residential rate programs wit agencies and entities designated by the CPU
9. I will pay back the discount I have received if I to support my application for the CARE or the

X

Customer signature ○ Fill in circle if you are a guardian or you have power of attorney.

Date

FOR INTERNAL USE ONLY

W

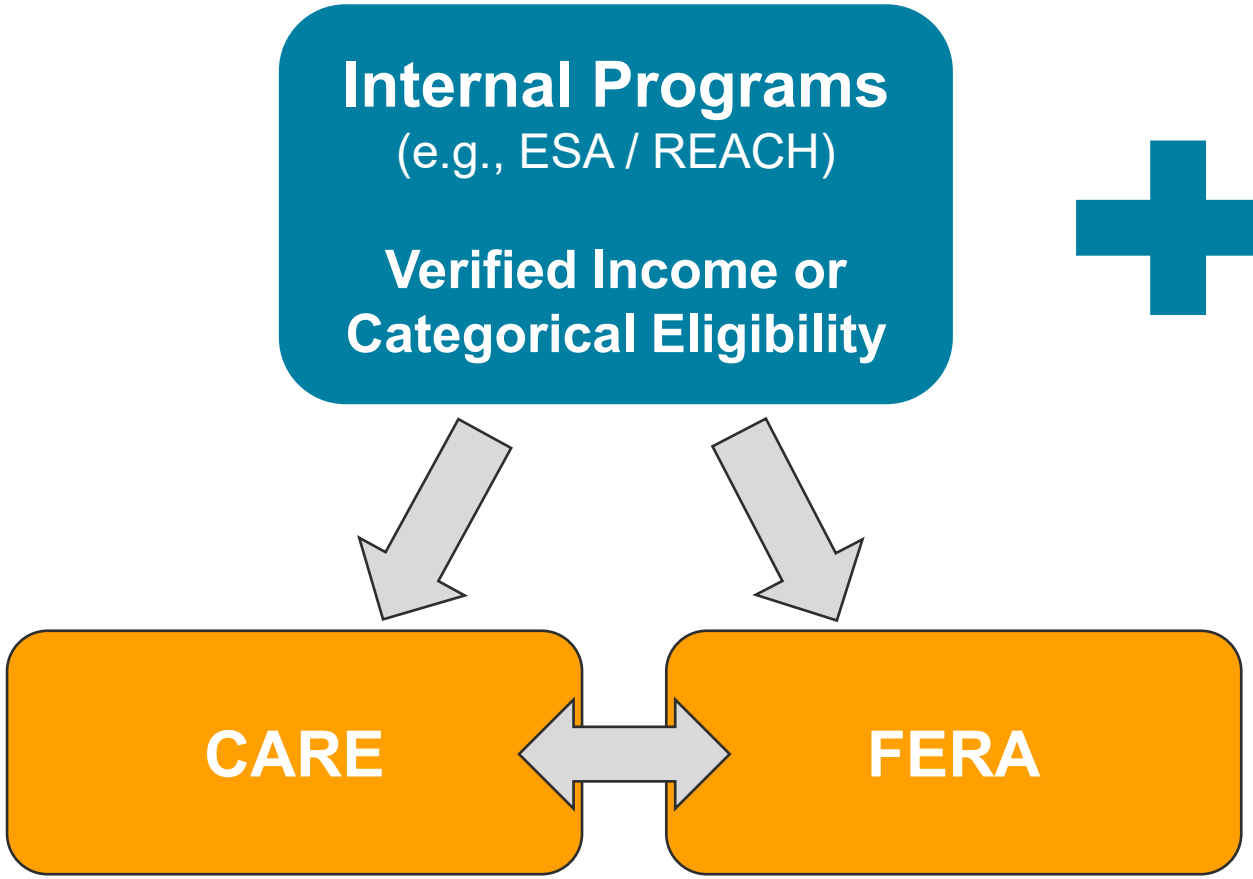
Self-Attestation

Customers can self-certify that they meet program eligibility requirements without providing proof of eligibility

But, self-attestation and categorical eligibility have limitations and may not be feasible for all

Ways to Making Enrollment Easier: Automatic Enrollment

Verified Eligibility + Customer Consent = Automatic Enrollment in Eligible PG&E Programs



Consent Example: Relief for Energy Assistance through Community Help (REACH) Program

"I understand that by enrolling in the REACH program and depending on my household's eligibility, I authorize PG&E to directly enroll me into one of PG&E's bill discount programs, either the California Alternate Rates for Energy (CARE) program or the Family Electric Rate Assistance (FERA) program. If qualified and meet the requirements, I authorize PG&E to also directly enroll me into PG&E's Match My Payment program…."

Customer consent helps balance access to programs with privacy, transparency, and trust.

Ways to Making Enrollment Easier: Automatic Enrollment

PG&E's Examples:
External Data-Sharing Agreements (DSAs) Facilitate Cross-Enrollment for Eligible Customers

State

Department of Community Services and Development (CSD) - The Low Income Home Energy Assistance Program (LIHEAP)

Development: ~2 years (CPUC)

Security Requirement: Yes

Direction of Exchange: Inbound

Frequency: Monthly

Utilities

Energy: SMUD, SCE, SoCalGas

Water: California American Water, California Water Service, Del Oro Water, Golden State Water, Great Oaks Water, San Jose Water

Development: ~2 years (CPUC)

Security Requirement: Yes

Direction of Exchange: Bi-Direction

Frequency: Quarterly

Other Programs

GRID Alternatives -

The Disadvantaged Communities – Single-family Solar Homes Program (DAC-SASH)

Development: < 1 year (CPUC)

Security Requirement: Yes

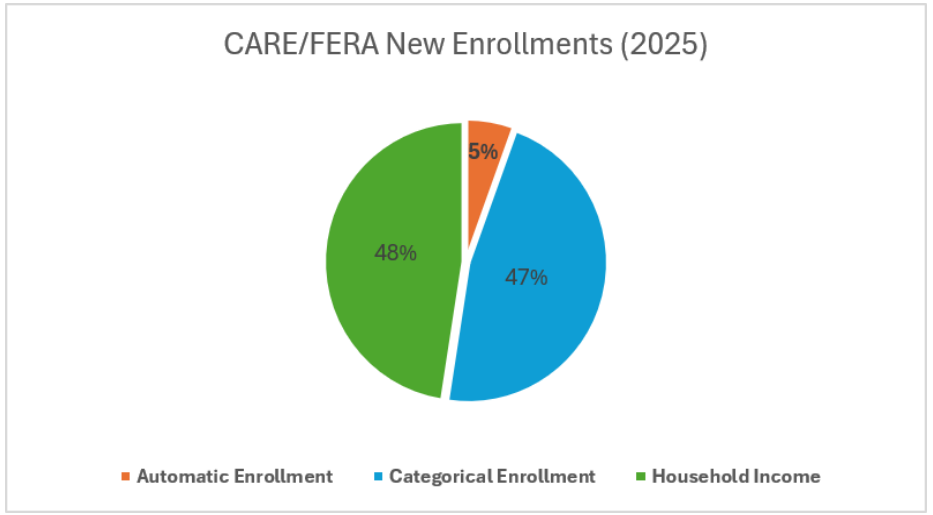
Direction of Exchange: Bi-directional

Frequency: Monthly

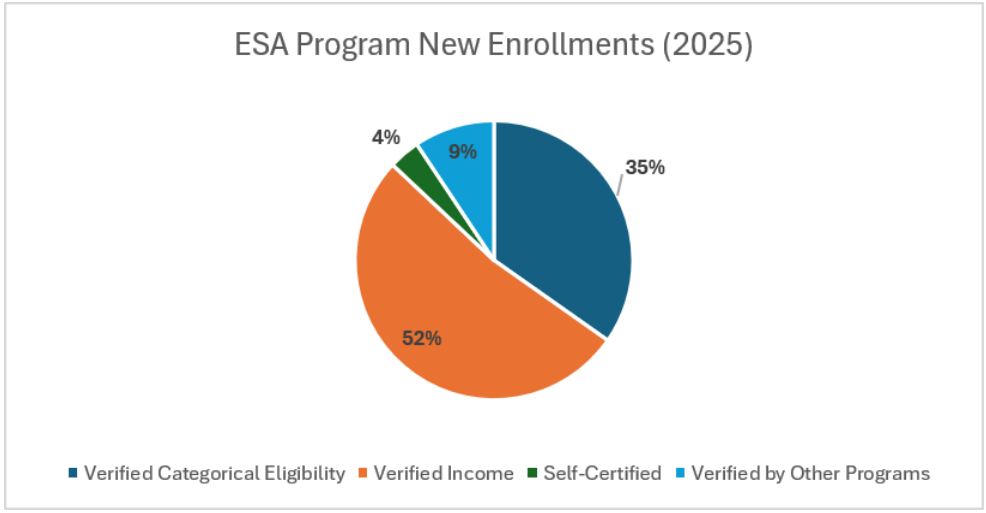
While these examples show progress, expanding data-sharing has been challenging due to privacy concerns and a lack of authority to require data sharing with utilities.

Program Enrollment Snapshot

In 2025, 5% of CARE/FERA customers were automatically enrolled based on verified eligibility through other programs, and 9% of ESA participants were exempt from re-verification.



- 48% Self-attested household income eligibility
- 47% Self-attested categorical eligibility
- 5% Eligibility verified through other programs (auto-enrollment)



- 35% Verified household income eligibility
- 52% Verified categorical eligibility
- 4% Self-attested eligibility
- 9% Eligibility verified through other programs (no additional verification required)

Despite efforts to leverage verified customer eligibility, enrollment through this pathway remains limited.

Source: 2025 IQP Annual Report

Unlocking Possibilities for Seamless Eligibility Verification

An Ideal Future: Making Enrollment Easier Through Electronic Eligibility Verification

In California, information exists digitally and state agencies have been developing tools to support eligibility verification

- Income Data – California Franchise Tax Board (FTB)
- Public Assistance Programs – California Statewide Automated Welfare System (CalSAWS)
- AccessCA (formerly the California Identity Gateway); the Statewide Verification Hub (SVH)

If IOUs could verify customer eligibility using these tools, there could be many benefits:

- Reduce customers' burden of proving eligibility to simply enrollment experience
- Minimize collection and retention of sensitive customer information
- Improve administrative efficiency and program operations

State leadership and enabling legislation will be key to realizing these opportunities.

Listening Session for Collective Learning

Finding Ways to Reduce Enrollment Barriers While Protecting Privacy and Program Integrity

- Roles of State or Local Regulations
- Navigating Data Security and Customer Privacy to Protect Personal Information
- Program Design and Processes
- Tools or Partnerships for Enabling Access to Verified Customer Information

Data Protection Laws & Principles



Nikki Flanigan Hooks
PG&E | Senior Manager, Privacy

Fair Information Practice Principles (FIPPs)

Transparency

Explain what personal information you collect and how you use and share it.

Individual participation

Provide meaningful choice, access, correction and redress where practicable.

Purpose specification

State the authority and specific purpose for collecting personal information.

Data minimization

Collect only what is necessary and retain it only as long as needed.

Use limitation

Limit use and sharing to compatible purposes. Apply protections when sharing.

Data quality and integrity

Keep personal information accurate, relevant, timely and complete.

Security

Protect personal information against loss, misuse and unauthorized access.

Accountability and auditing

Assign responsibility, train staff and audit compliance with privacy protections.

Privacy Frameworks

FIPPs	CCPA	Rule 27
Transparency	Notice (Privacy Policy) at or before time of collection specific to data collection and uses.	Notice (CEUD Notice) at time of account creation and annually specific to covered information.
Security		
Purpose Specification		
Data Minimization	Right to opt-out of sale/share of data and right to limit use of sensitive data.	Express written consent (and right to revoke) for secondary purposes of covered information.
Use Limitation		
Data Integrity		
Accountability & Auditing	Consumers have more control over their data (access, delete, correct).	Consumers have access to covered information and the right to revoke consent for secondary purposes.
Individual Participation		

How Do We Get There?

Privacy and Innovation are not mutually exclusive



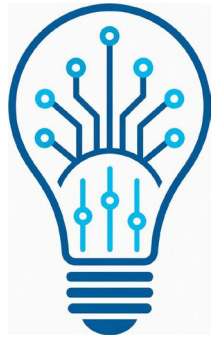
Privacy by Design

- Engage us early and often
- Proactive and not reactive
- Privacy as a default



Customer at the Heart

- Give customers the power to make decisions about their data
- Transparency
- Purpose driven



Innovation

- Proper security controls to manage and protect data
- Privacy Enhancing Technologies (PETs) for minimization
- AI and human in the loop

SMUD: A Case Study



Tara Porter

SMUD | Director, Customer Operations & Assistance







SMUD: A California Case Study

November 5, 2026

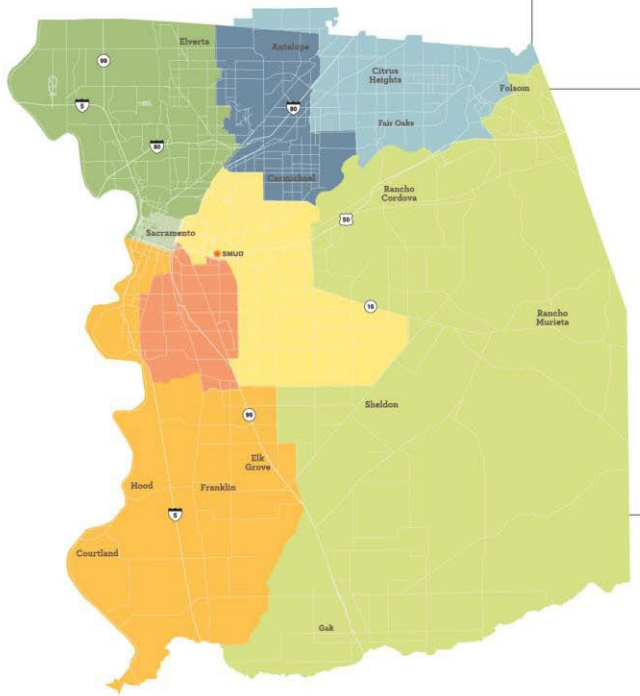
Powering forward.
Together.

SMUD®

About SMUD

SMUD is your community-owned, not-for-profit electric service.

6th largest community-owned **in the U.S.**



75+ Years
Est. 1946

~682,000 Customers

~2,500 Employees

2025 Power mix
67%
carbon-free



7 member
Elected
Board of Directors

SMUD's rates are among the lowest in California.

SMUD®

EAPR history

1989

SMUD established a low-income residential subsidy, funded by a 1% surcharge on all customer classes. Subsidy was originally set at 28% below the unsubsidized rate.

2005

SMUD aligned the program with CPUC low-income eligibility guidelines.

2007

Eligibility expanded to 200% of Federal Poverty Level (FPL).

2016

SMUD shifted to data-driven redesign after finding the existing structure still left many customers with high bill burden, higher dunning rates, 6.5x higher disconnection risk and continued reliance on EnergyHELP support.

2019

A new tiered EAPR rate was phased in over 3 years, targeting discounts by income level and directing more support to the lowest-income customers.

2024

SMUD added an extra $35 for Tier 1 customers through the EAPR Rate Stabilization Fund (ERSF), subject to annual availability of discretionary non-retail revenue.

Federal Poverty Level	SIFC discount	Max. energy discount
0 – 50%	$10	$60
>50 – 100%	$10	$32
>100 – 150%	$10	$10
>150 – 200%	$10	- -

SMUD®

Where we are today…

Energy Assistance Program Rate (EAPR) is highly verified, operationally intensive and serving a large customer base.

- **75,000 customers** enrolled
- **$2.3M monthly subsidy**

- Recertification:
  - every **1-2 years** for most customers
  - every **4 years** for Social Security recipients
  - **90 days** to recertify before removal

Customer enrollment options:

- SMUD continuously improves enrollment options to include various ways customers can apply.
  - Options include: Online, mail, and in-person
- In-language options are available for customers. Languages are assessed annually and added as needed, with 9 languages available.
  - Online
  - Mail
  - Customer Advocacy events

Operational notes:

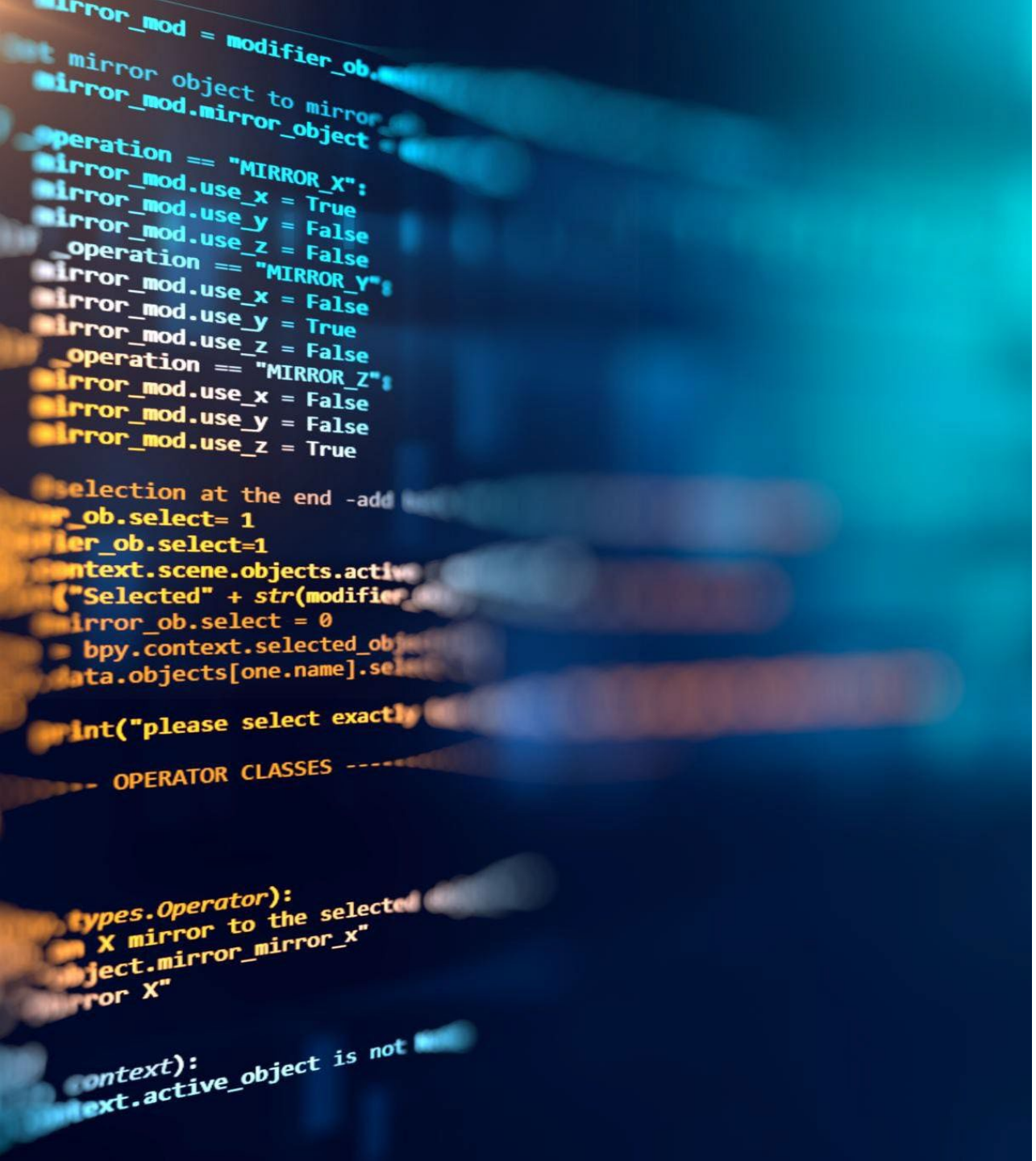
- EAPR requires 100% income verification. Income verification is fully manual and takes a team of processors to take on this task.
- Continuous improvement of programs that's completed through annual customer feedback, journey mapping, annual CSAT, data and focus groups.
- Ongoing QA is essential to ensure program integrity.

SMUD®

EAPR eligibility

- Customer must enroll online or submit a paper application
- Requires signed EAPR application
- Income documents for all adults living in the household
  - Common sources of income including but not limited to wages, Social Security and self-employment
- Customers will receive a discount based on their household size and income
- Applications are manually processed within 1-2 weeks
- Recertification is required for customers to remain on the program





Customer-centered data sharing

Our goal is to increase customer ease and program participation. One of the ways we are successful in meeting this goal is to enter into data sharing agreements. We're strategic in who we share customer data with, and take a careful, structured approach to granting access.

- **Before any data is shared**, we evaluate purpose, partner relationship, privacy and security protections, and how the information will benefit customers.

SMUD has data sharing agreements with a few of the following partners:

- PG&E
- LIHEAP
- Water/Sewer Agencies

Customer advocacy

Our Customer Advocacy programs deliver proactive, white-glove support that helps customers access income-eligible, medical and bill assistance resources.

How we're successful in Customer Advocacy:

- Established a Customer Advocacy Team focused on understanding customer needs, community engagement and fostering empathy
- Weekly lobby days
- Pop-up events
- CBO relationships, presentations, train-the trainer events
- Neighborhood Walks
- Late-payer outreach
- Home visits, in collaboration with Weatherization team
- Pilot programs/offerings
- Customer engagement surveys, satisfaction survey, focus groups
- Program training to internal partners



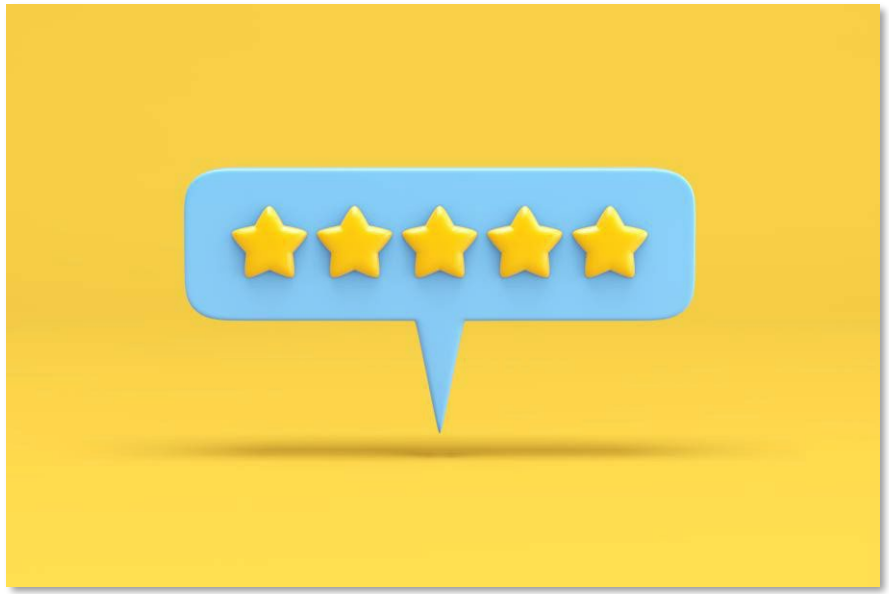


SMUD

Continuing to improve the customer experience… looking ahead

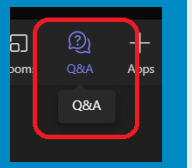
We continue to refine EAPR to improve access, reduce energy burden and maintain program integrity.

- Explore program offerings to LMI customers
- Categorical/Self-Attestation pilot
- Proactively reach out to customers who requested EAPR applications through Contact Center/IVR
- Modifying EAPR Tariff language to allow for automatic dual enrollment with similar programs (HEAP/CARE)
- Rely on customer feedback, journey mapping, data and surveys/focus groups



Q&A and Discussion

Virtual: Please submit questions using the Q&A feature



In-person: Please raise your hand to ask your question. To ensure we have time for everyone, please keep your question and comments under 2 minutes.

Networking and Stretch Break!

The next session will begin at 11:00 AM PST.

Session 2: Making it Easier for Customers – Government Partnerships, Legislative Directives and Income Verification Strategies



Melissa Bookwalter

Seattle City Light
Customer Operations Financial Assistance Portfolio Manager



Jessica Kenyon

Seattle City Light
Customer Experience Data Analytics & Quality Assurance Manager



Gerald Reiner

PSEG NJ
Energy Efficiency Program Support Manager



Mikaela Terpko

Avista
Senior Energy Program Manager

Partnering with Affordable Housing Authorities



Melissa Bookwalter

Seattle City Light |
Customer Operations
Financial Assistance Portfolio manager



Jessica Kenyon

Seattle City Light |
Customer Experience Data Analytics
& Quality Assurance Manager

Seattle City Light: Partnering with Affordable Housing

Melissa Bookwalter, Customer Operations Financial Assistance Portfolio Manager

Jessica Kenyon, Customer Experience Data Analytics & Quality Assurance Manager

11/5/2026



Seattle City Light

WE POWER SEATTLE

Seattle City Light Key Facts

CUSTOMER STATISTICS

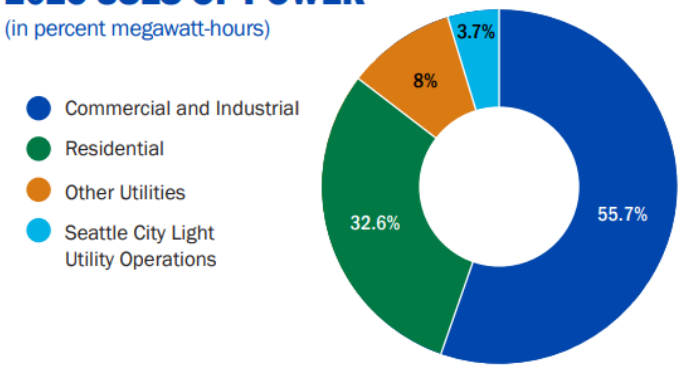
Data shown reflects the latest information available through Dec. 31, 2025.

	Average Number of Customers	Megawatt-Hours*
Residential	472,309	3,229,894
Commercial and Industrial	52,731	5,777,400
Total	525,040	9,007,294

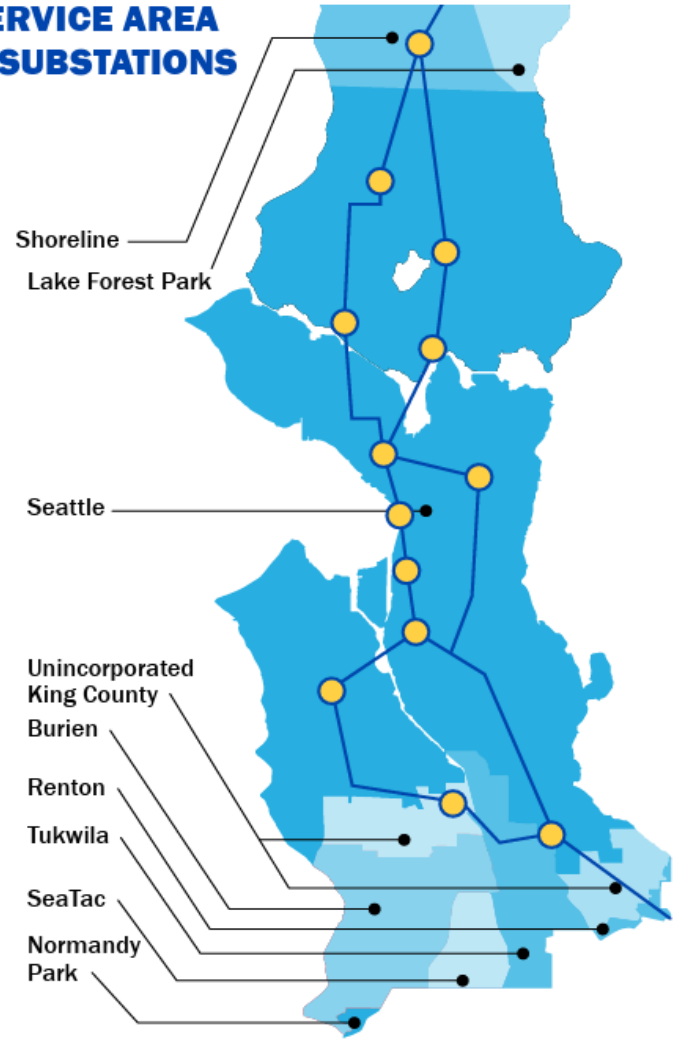
*Amounts include an allocation for the net change in unbilled revenue which excludes retail customer voluntary payments for conservation and solar energy.

2025 USES OF POWER

(in percent megawatt-hours)



SERVICE AREA & SUBSTATIONS



Source: FingertipFacts.pdf

Residential Bill Assistance Today

Utility Discount Program (UDP)

Ongoing **60% discount for SCL customers** and 50% discount for SPU customers for future bills.

Available to households up to 70% SMI

$51M in benefits annually
Serves ~42,000 customers

SCL's Emergency Bill Assistance Program (EBA)

Up to $1420 in assistance per year for households with children

$710 for households without children

$4M benefit annually
Serves ~6,000 customers

Available to households with **incomes up to 80% SMI** ($76,548 for a 2-person household in 2026)

Available to households with **incomes up to 80% AMI** ($105,408 for 2-person household in 2026)

SCL's Project Share

Funded by customer donations

Provides a **$250 bill credit**, once per calendar year

$800K benefit annually
Serves ~2,300 customers

More program info: seattle.gov/utilitybillhelp

Current State: Success Increasing Enrollment

- **42,000** currently enrolled in the Utility Discount Program
- **30,000** applications for UDP and Bill Assistance *received and processed this year*
- **1,450** enrolled via affordable housing partnerships *making it easier for customers leveraging income already verified from another source*
- **39%** participation rate *up from 2025 Q4 32% of eligible customers at 70% SMI*

Partnerships to Leverage Income Verification

Regulatory Framework

- Washington State Clean Energy Transformation Act (CETA) defining energy burden as greater than 6% of annual household income and low-income customers as up to 80% Area Median Income (AMI).
- Utility assistance programs operate under Seattle Municipal Code SMC 21.49.040, Seattle City Light Department Policy & Procedures (III-428), City of Seattle Ordinance 125171, and Seattle Public Utilities Director's Rule CS-700.

Partnership and Enrollment Enhancements

- A 2016 ordinance change enabled automatic enrollment of Seattle Housing Authority households into utility assistance programs.
- Data-sharing agreements with partner agencies support secure resident data transfer, with program opt-out options managed by affordable-housing partners.

Customer Experience Insights

- Customer feedback indicates that providing income verification across multiple programs can be stressful and retraumatizing.

Current Cross-Enrollment Pilot Initiatives

- A pilot with Public Health—Seattle & King County's Navigation Team is testing cross-enrollment into programs such as Apple Health, ORCA Lift, and King County Energize.

Bulk Auto-enrollment Process

Purpose

- Streamline enrollment into Utility Assistance by leveraging verified tenant data from partnered housing providers.
- Reduce customer burden and improve participation in an environment with frequent tenant turnover.

Customer Experience Benefits

- Reduced need for customers to self-submit documentation.
- Fewer interruption in discounts due to recertification process and outdated eligibility information.
- Proactive identification of eligible households.

Integration with LIHEAP

- Internal tracking of LIHEAP funding ensures those individuals are automatically enrolled in Utility Assistance.
- Improves program reach and ensures no duplicate effort for the customer.

Auto-enrollment Processing

Key Process Components

- Data Partnerships: Three housing providers submit quarterly tenant files including name, address, income, and household size.
- Account Matching: Utility data analytics team matches tenant records to customer accounts (name + service address). The process is scripted so it runs consistently with minimal manual review.
- Eligibility Confirmation: Income and household size are validated against program criteria.

New Enrollment Processing

- After the tenant list is validated by data analytics, new eligible households are passed to database administrator teams for batch upload into the application system.
- Automation reduces manual work and improves processing speed.

Ongoing Recertification

- Existing customers normally have a recertification of eligibility timeline tied to their original application.
- Receipt of housing provider data allows timelines to be extended or updated automatically, reducing unnecessary disenrollment.

Future State: Summary of Expanded Utility Assistance

Utility Discount Program

Expand eligibility from 70% SMI to 60% AMI

- Continues SCL 60% and SPU 50% bill discounts
- Increases eligible population **by 28%**
- Provides an **additional ~$19M** in annual bill discounts

Emergency Bill Assistance

Expand eligibility from 80% SMI to 80% AMI

- Increases eligible population **by 50%**
- Provides an **additional ~$4M** in assistance annually

Project Share

Eligibility remains up to 80% AMI

- Provides an **additional ~$1M** in assistance annually

THANK YOU

Seattle City Light

Legislation to Enable Cross-Program Collaboration



Gerald Reiner

PSEG NJ | Energy Efficiency Program Support Manager

Community Action Agencies & Income Verification



Mikaela Terpko
Avista | Senior Energy Program Manager

Making Income Verification Work for Everyone

Avista's Partnership with Community Action Agencies

Mikaela Terpko, Sr. Bill Assistance Program Manager, Avista Utilities

Avista and Affordability

What is LIRAP?



Avista Utilities' **Low-Income Rate Assistance Program** (LIRAP) collects funding through electric and natural gas tariff surcharges, which are distributed in partnership with Community Action Agencies



LIRAP can help a household avoid having its utilities shut off, reestablish service after a disruption, and/or pay ongoing energy costs.



PURPOSE: Reduce Energy Cost Burden and Encourage Energy Conservation

LIRAP: My Energy Discount

Washington and Oregon

Ongoing Affordability

Seasonal My Energy Discount – WA (Winter: Nov-Apr, Non-Winter: May-Oct)

Tier One: 10% Winter, 0% Non-Winter	Tier Two: 30% Winter, 5% Non-Winter	Tier Three: 50% Winter, 25% Non-Winter	Tier Four: 80% Winter, 60% Non-Winter	Tier Five: 95% Winter, 90% Non-Winter

My Energy Discount – OR

Tier 1: 15%	Tier 2: 25%	Tier 3: 60%	Tier 4: 90%

Avenues for Access



Online



Phone



Mail



Community Action

Ongoing Affordability: My Energy Discount

A personalized, monthly bill discount for income-eligible households



Discounts are based on ***self-declared*** monthly or annual income (up to 200% FPL or 80 % AMI in WA or 60% SMI in OR)



No paperwork or proof of income required!



Jointly administered between Avista and agencies



Available to Oregon & Washington customers



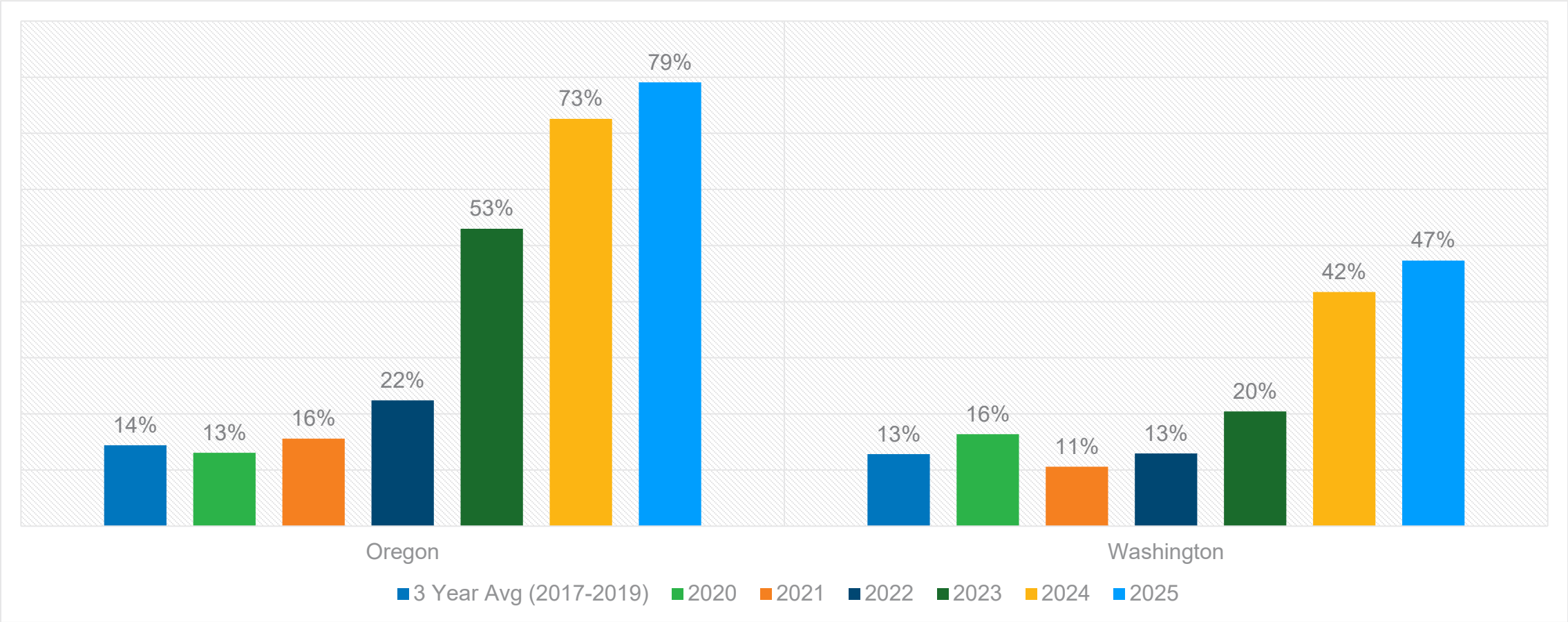
Participants remain eligible for other helpful programs through their local agencies, as well as other energy assistance



Utility enrollees are connected to expanded agency services

The Case for Low-Barrier Enrollment

Saturation Rate over Time



Saturation rate equals the percentage of estimated eligible customers who are receiving any form of bill assistance.

Post-Enrollment Income Verification (PEV)



A random selection of **3%** (Oregon) **6**% (Washington) of the total enrollment pool pulled from the previous month



Those who have been verified might be captured in the random pool, but will *not* be required to complete verification

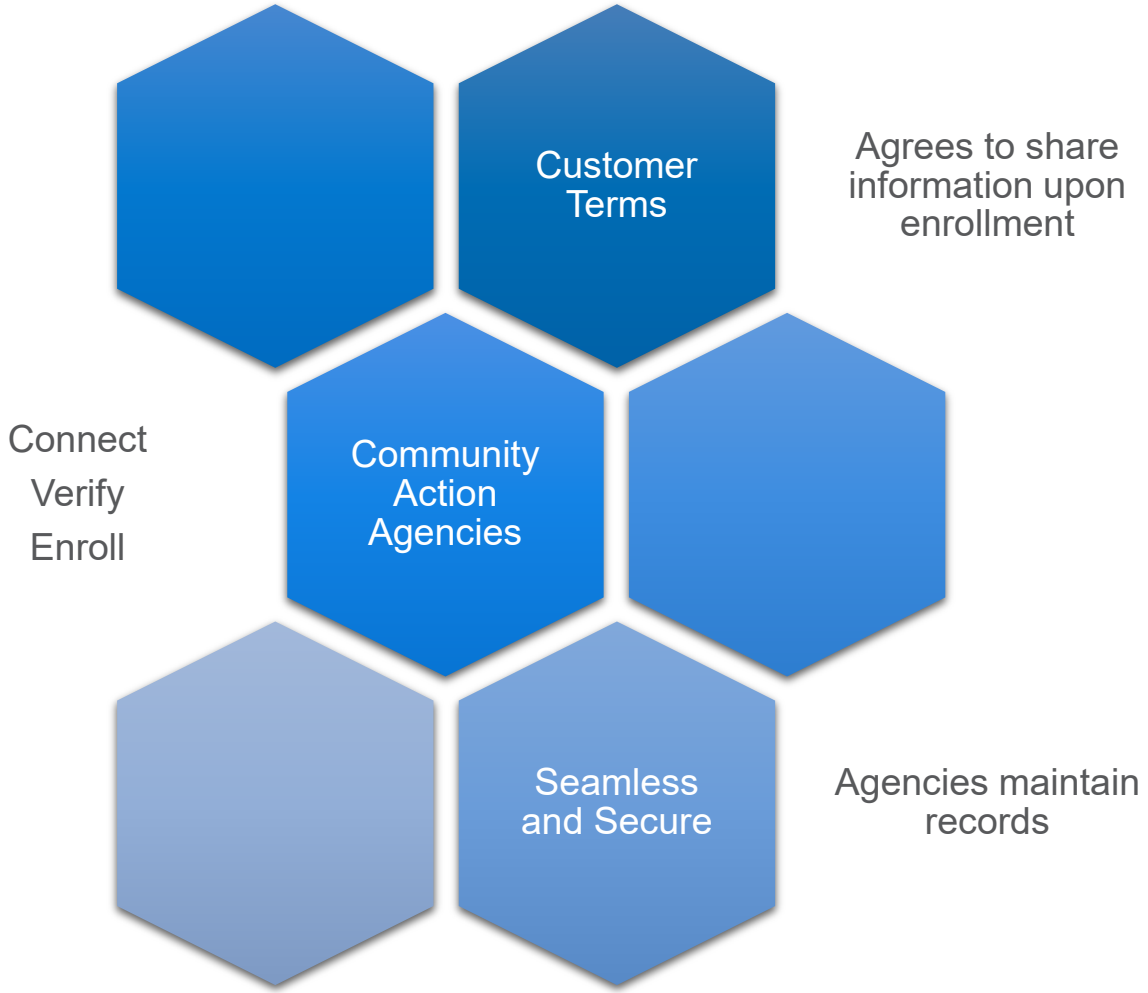


Letter sent by Avista to selected customers instructing them to work with their local Community Action Agencies to complete income verification

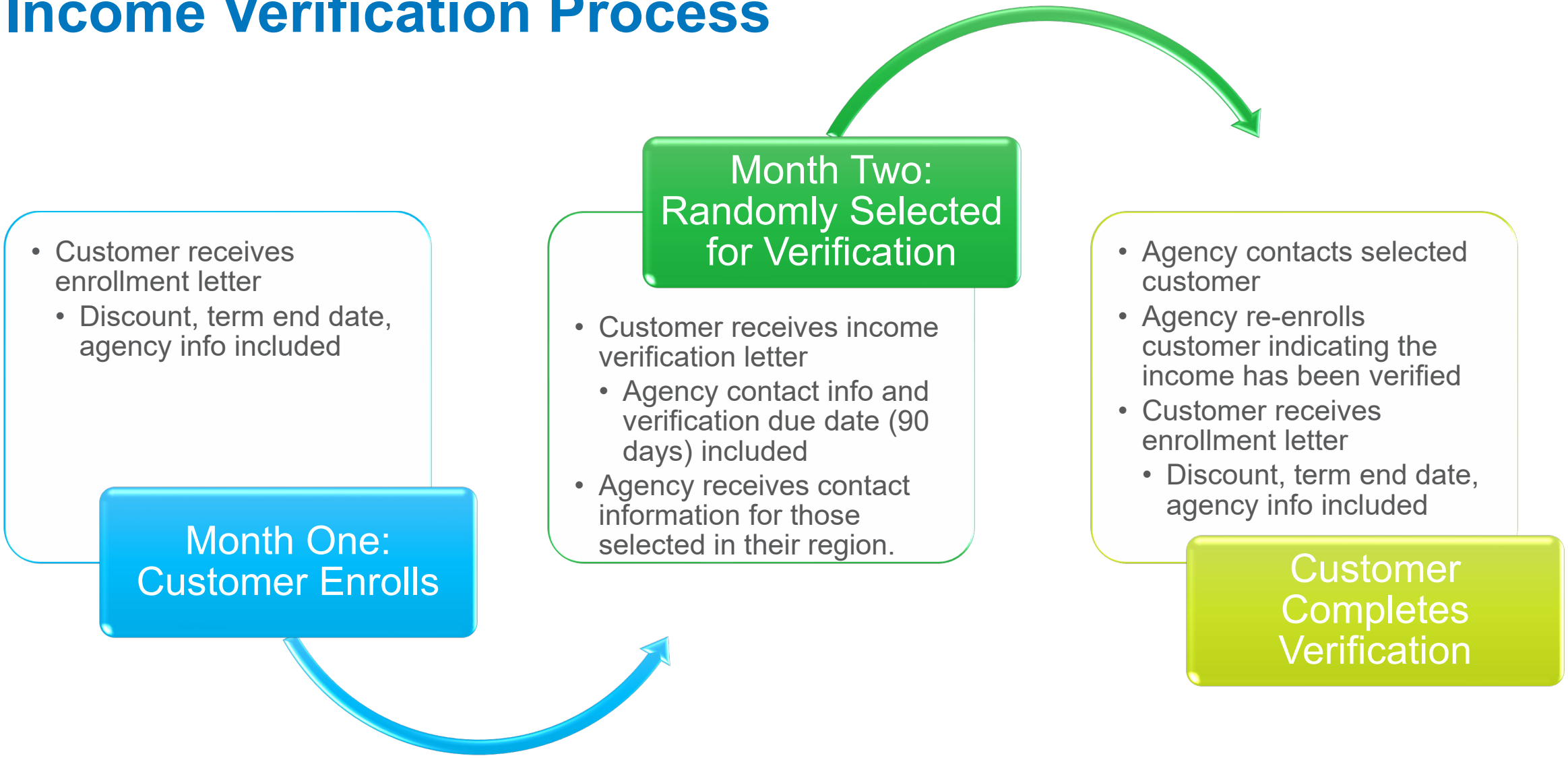


Avista shares list of selected customers in each agency's service area monthly (new and still pending)

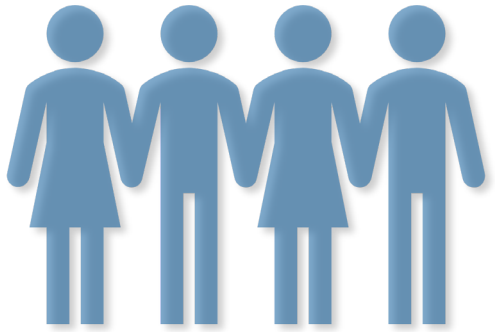
Community Action Agency Expertise



Income Verification Process



Post-Enrollment Verification Results



Total Selected

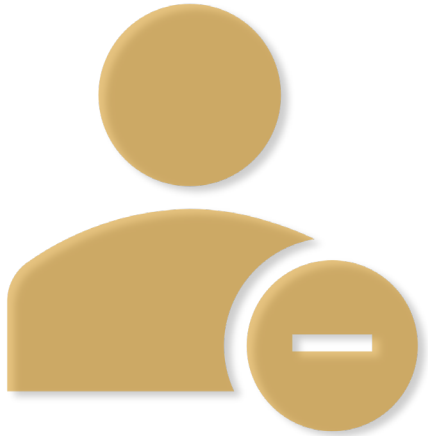
2,683



Complete & Enrolled

1,484

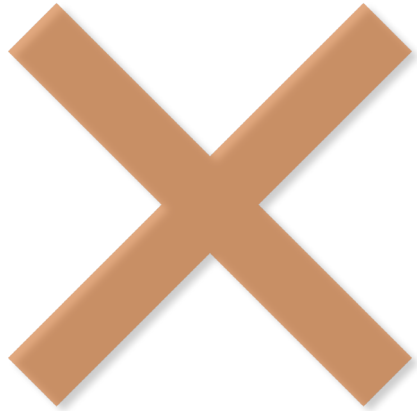
55%



Complete & Ineligible

27

1%



Incomplete & Removed

719

27%

Post-Enrollment Verification began in Oregon in May 2025, and Washington in April 2024.

Cumulative Snapshot through 9/30/2025

The Case for Self-Attestation: Verification Results

Results of Completed Verifications	Percentage of Total Completed
Decreased Discount	13%
Increased Discount	13%
No Change to Discount	63%
Did not Qualify	2%
Auto Enroll (Categorically Eligible)	10%
Total	**100%**

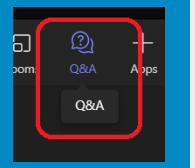
Post-Enrollment Verification began in Oregon in May 2025, and Washington in April 2024.

Cumulative Snapshot for OR and WA combined through 9/30/2025

Thank you

Mikaela.Terpko@avistacorp.com

Q&A and Discussion

Virtual: Please submit questions using the Q&A feature 

In-person: Please raise your hand to ask your question. To ensure we have time for everyone, please keep your question and comments under 2 minutes.

Q&A Discussion



Melissa Bookwalter
Seattle City Light
Customer Operations Financial Assistance Portfolio Manager



Jessica Kenyon
Seattle City Light
Customer Experience Data Analytics & Quality Assurance Manager



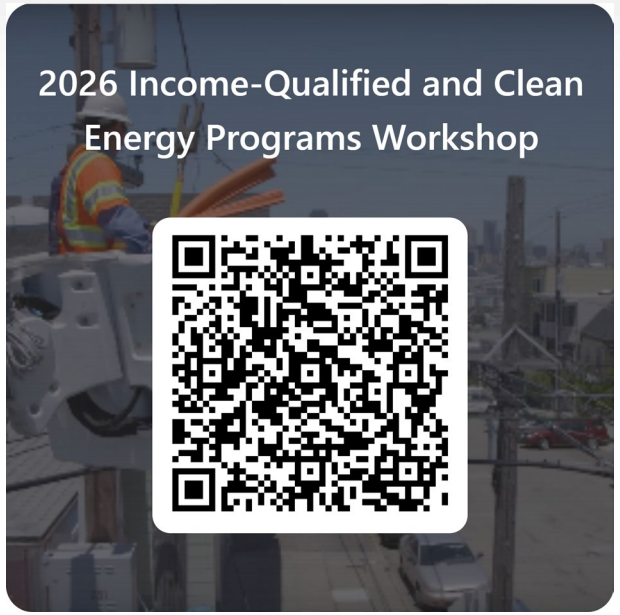
Gerald Reiner
PSEG NJ
Energy Efficiency Program Support Manager



Mikaela Terpko
Avista
Senior Energy Program Manager

Use the Q&A feature or join the in-person queue to ask a question!

Please take two minutes to provide feedback!



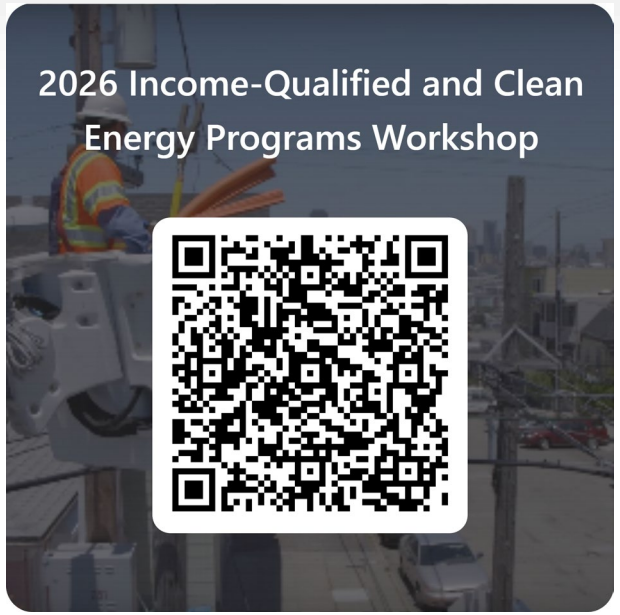
Closing Remarks



Cathleen Monahan

PG&E | Senior Manager, Strategy and Policy, Income-Qualified Programs

Thank you for joining! Please take two minutes to provide feedback!



PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs – Program Years 2028-2033
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_012-Q001
PG&E File Name:	IQPPY28-33_DR_TURN_012-Q001
Request Date:	November 17, 2026
Requester DR No.:	012
Requesting Party:	The Utility Reform Network
Requester:	Reina L. Yanagiba
Date Sent:	November 25, 2026
PG&E Witness(es):	Jenny Wu- Customer and Marketing

SUBJECT: IQP ENROLLMENT STRATEGIES

QUESTION 001

Please find attached the workshop notice and slides used at the 2026 Income-Qualified and Clean Energy Programs Workshop, held by PG&E, SCE, SDG&E, and SoCalGas on November 5, 2026.

Did PG&E consider any of the information and data included in the workshop slides in preparing its IQP proposals in this proceeding.

ANSWER 001

PG&E objects to this request on the grounds that it is overbroad, vague, and calls for speculation to the extent that it seeks PG&E to opine on the slides and presentations by other non-PG&E entities. In addition, the request broadly asks whether PG&E "considered any of the information and data included in the workshop slides" without identifying any specific information, data, proposal, or slide at issue.

Moreover, the request is unduly burdensome and calls for speculation because it requires PG&E to determine whether any information contained anywhere within the 2026 Income-Qualified and Clean Energy Programs Workshop (Workshop) materials influenced PG&E's proposals. Given that the Workshop included presentations from multiple utilities regarding programs that PG&E does not administer, responding would require PG&E to review, analyze, and characterize information presented by other utilities and to speculate as to the relevance or impact of such information on PG&E's proposals. In addition, PG&E was not privy to the development of those presentations or the underlying analyses supporting them prior to the Workshop, which was held on November 5, 2026, approximately 10 months after PG&E filed its application in this proceeding on January 9. 2026.

Subject to and without waiving these objections, PG&E responds as follows based solely on PG&E's presentation at the Workshop as excerpted in the attachment to this response (See IQPPY28-33_DR_TURN_012-Q001Atch01). Accordingly, PG&E does not undertake to address information or analyses presented by other utilities.

As the Workshop focused on data-sharing to facilitate program enrollment, PG&E interprets the phrase “information and data included in the workshop slides” to refer to the information and data presented in PG&E’s Workshop presentation regarding its efforts to leverage verified eligibility to facilitate customer enrollment.

Based on this, PG&E considered in its IQP proposals the various mechanisms for enrolling and retaining customers that were described in its Workshop presentation. These mechanisms include:

- PG&E Workshop slide 3: Self-attestation and Categorical Eligibility

  In its Direct Prepared Testimony, PG&E details its current use of self-attestation and categorical eligibility to simplify enrollment[1] and its proposal to continue these enrollment pathways during the 2028-2033 program cycle.[2]

- PG&E Workshop slides 4 and 5: Automatic Enrollment

  In its Direct Prepare Testimony, PG&E describes the current use of automatic enrollment for eligible customers through verified eligibility information obtained from internal and external programs, where permitted by privacy requirements,[3] as well as PG&E's proposal to continue automatically enrolling customers through existing partnerships and data-sharing agreements.[4]

Consistent with its Workshop presentation (slides 5 and 6), PG&E also acknowledges in its Direct Prepared Testimony its enrollment outcomes and the challenges associated with expanding data-sharing agreements to support cross-enrollment into its income-qualified programs.[5] Specifically, PG&E states that "while data-sharing agreements have served as a useful tool to cross-enroll qualified customers in CARE and FERA, they have not been easy to implement primarily due to customer consent and privacy barriers. PG&E has been unable to establish new data-sharing agreements with additional programs."[6] PG&E also provided additional details regarding its efforts and difficulties it has encountered in its response to IQPPY28-33_DR_TURN_003-Q014. Nevertheless, PG&E remains interested in establishing additional data-sharing agreements with other programs to facilitate cross-program enrollment.[7]

With respect to coordination with state agencies to enable data sharing (PG&E Workshop Slide 7), PG&E indicates in its Direct Prepared Testimony that it has engaged with certain state entities to discuss data-sharing opportunities but has not yet identified a viable pathway for implementation.[8] Similarly, PG&E remains interested in

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[1] Exhibit (PGE-01E), Chapter 2, Section G.1.a.(1a)

[2] Id., pp.2-19 to 2-20.

[3] Id., Chapter 2, Section G.1.a.(1b)

[4] Id., p.2-20.

[5] Id., pp.2-17, 2-18, and 2-19.

[6] Id., p.2-19.

[7] Id., p.2-31.

[8] Id., Table 2-22, p.2-31.

continuing to work with state entities to identify viable approaches for leveraging verified customer eligibility information to support enrollment in its income-qualified programs.[9]

[9] Ibid.

Making Program Enrollment Easier for Income-Qualified Customers



Background

PG&E has long-standing programs supporting customers with household income at or below 250% of the Federal Poverty Level (FPL)

CARE

- California Alternate Rates for Energy Program
- Monthly gas and electric bill discount
- Up to 200% FPL
- Established in 1989

FERA

- Family Electric Rate Assistance Program
- Monthly electric bill discount
- 200% FPL + $1 to 250% FPL
- Established in 2004

ESA

- Energy Savings Assistance Program
- Energy efficiency and weatherization direct install
- Up to 250 FPL%
- Established in 1983

In 2025, over 1.4 million households received monthly bill discounts through CARE and FERA, while more than 50,000 homes received energy-saving improvements through ESA.

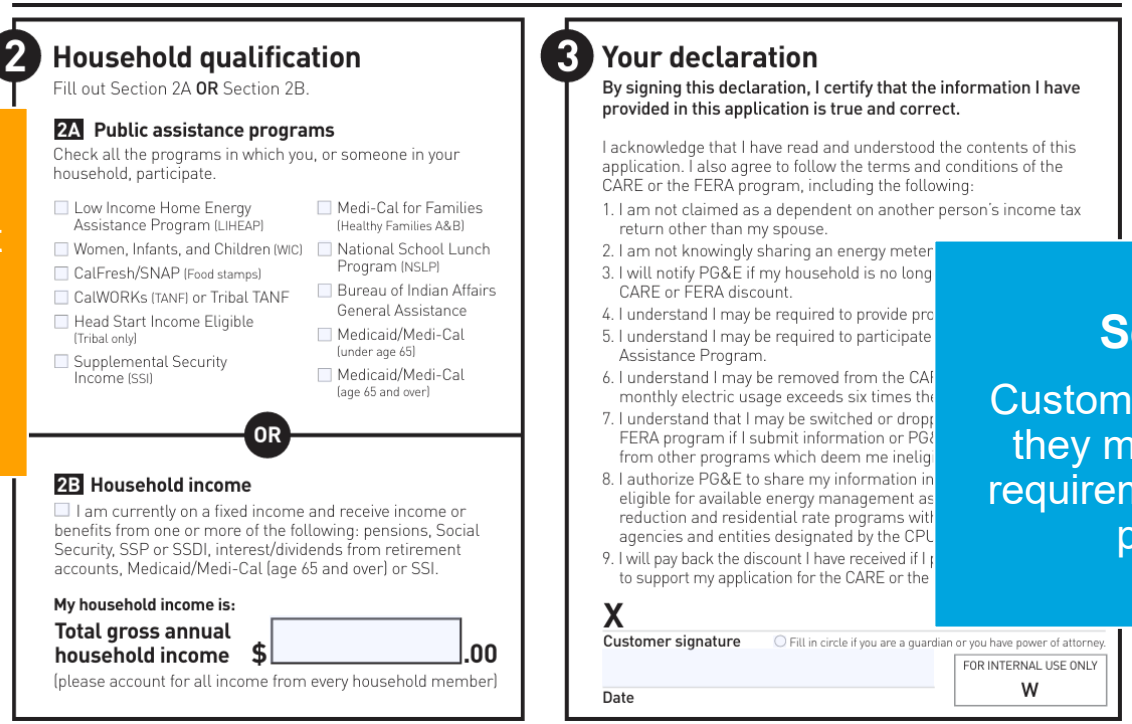
Ways to Making Enrollment Easier: Simplified Application

Self-Attestation and Categorical Eligibility Simplify Enrollment

No upfront eligibility documentation. No household income calculations..

Categorical Eligibility

Customers can self-attest that their household participates in one or more public assistance programs accepted by the program.



2 Household qualification

Fill out Section 2A **OR** Section 2B.

2A Public assistance programs

Check all the programs in which you, or someone in your household, participate.

- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ Women, Infants, and Children (WIC)
- ☐ CalFresh/SNAP (Food stamps)
- ☐ CalWORKs (TANF) or Tribal TANF
- ☐ Head Start Income Eligible (Tribal only)
- ☐ Supplemental Security Income (SSI)
- ☐ Medi-Cal for Families (Healthy Families A&B)
- ☐ National School Lunch Program (NSLP)
- ☐ Bureau of Indian Affairs General Assistance
- ☐ Medicaid/Medi-Cal (under age 65)
- ☐ Medicaid/Medi-Cal (age 65 and over)

OR

2B Household income

☐ I am currently on a fixed income and receive income or benefits from one or more of the following: pensions, Social Security, SSP or SSDI, interest/dividends from retirement accounts, Medicaid/Medi-Cal (age 65 and over) or SSI.

My household income is:

Total gross annual household income $ _____ .00

(please account for all income from every household member)

3 Your declaration

By signing this declaration, I certify that the information I have provided in this application is true and correct.

I acknowledge that I have read and understood the contents of this application. I also agree to follow the terms and conditions of the CARE or the FERA program, including the following:

1. I am not claimed as a dependent on another person's income tax return other than my spouse.
2. I am not knowingly sharing an energy meter
3. I will notify PG&E if my household is no long CARE or FERA discount.
4. I understand I may be required to provide prc
5. I understand I may be required to participate Assistance Program.
6. I understand I may be removed from the CAI monthly electric usage exceeds six times th
7. I understand that I may be switched or dropp FERA program if I submit information or PG& from other programs which deem me inelig
8. I authorize PG&E to share my information in eligible for available energy management as reduction and residential rate programs with agencies and entities designated by the CPU
9. I will pay back the discount I have received if I to support my application for the CARE or the

X

Customer signature ○ Fill in circle if you are a guardian or you have power of attorney.

Date

FOR INTERNAL USE ONLY

W

Self-Attestation

Customers can self-certify that they meet program eligibility requirements without providing proof of eligibility

But, self-attestation and categorical eligibility have limitations and may not be feasible for all programs.

Ways to Making Enrollment Easier: Automatic Enrollment

Verified Eligibility + Customer Consent = Automatic Enrollment in Eligible PG&E Programs

Internal Programs
(e.g., ESA / REACH)

Verified Income or Categorical Eligibility

+

CARE ⟷ **FERA**

Consent Example: Relief for Energy Assistance through Community Help (REACH) Program

"I understand that by enrolling in the REACH program and depending on my household's eligibility, I authorize PG&E to directly enroll me into one of PG&E's bill discount programs, either the California Alternate Rates for Energy (CARE) program or the Family Electric Rate Assistance (FERA) program. If qualified and meet the requirements, I authorize PG&E to also directly enroll me into PG&E's Match My Payment program…."

Customer consent helps balance access to programs with privacy, transparency, and trust.

Ways to Making Enrollment Easier: Automatic Enrollment

PG&E's Examples: External Data-Sharing Agreements (DSAs) Facilitate Cross-Enrollment for Eligible Customers

State

Department of Community Services and Development (CSD) - The Low Income Home Energy Assistance Program (LIHEAP)

Development: ~2 years (CPUC)

Security Requirement: Yes

Frequency: Monthly

Utilities

Energy: SMUD, SCE, SoCalGas

Water: California American Water, California Water Service, Del Oro Water, Golden State Water, Great Oaks Water, San Jose Water

Development: ~2 years (CPUC)

Security Requirement: Yes

Frequency: Quarterly

Other Programs

GRID Alternatives -

The Disadvantaged Communities – Single-family Solar Homes Program (DAC-SASH)

Development: < 1 year (CPUC)

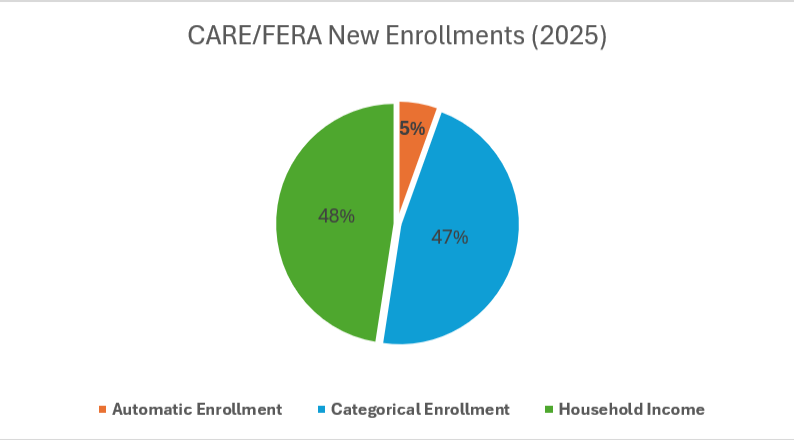
Security Requirement: Yes

Frequency: Monthly

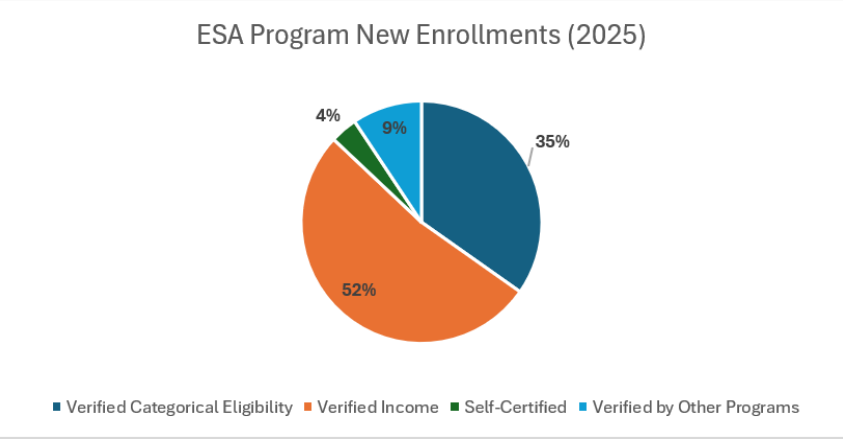
While these examples show progress, expanding data-sharing has been challenging due to privacy concerns and a lack of authority to require data sharing with utilities.

Program Enrollment Snapshot

In 2025, 5% of CARE/FERA customers were automatically enrolled based on verified eligibility through other programs, and 9% of ESA participants were exempt from re-verification.



- 48% Self-attested household income eligibility
- 47% Self-attested categorical eligibility
- 5% Eligibility verified through other programs (auto-enrollment)



- 35% Verified household income eligibility
- 52% Verified categorical eligibility
- 4% Self-attested eligibility
- 9% Eligibility verified through other programs (no additional verification required)

Despite efforts to leverage verified customer eligibility, enrollment through this pathway remains limited.

Source: 2025 IQP Annual Report

Unlocking Possibilities for Seamless Eligibility Verification

An Ideal Future: Making Enrollment Easier Through Electronic Eligibility Verification

In California, information exists digitally and state agencies have been developing tools to support eligibility verification

- Income Data – California Franchise Tax Board (FTB)
- Public Assistance Programs – California Statewide Automated Welfare System (CalSAWS)
- AccessCA (formerly the California Identity Gateway); the Statewide Verification Hub (SVH)

If IOUs could verify customer eligibility using these tools, there could be many benefits:

- Reduce customers' burden of proving eligibility to simply enrollment experience
- Minimize collection and retention of sensitive customer information
- Improve administrative efficiency and program operations

State leadership and enabling legislation will be key to realizing these opportunities.

Listening Session for Collective Learning

Finding Ways to Reduce Enrollment Barriers While Protecting Privacy and Program Integrity

- Roles of State or Local Regulations
- Navigating Data Security and Customer Privacy to Protect Personal Information
- Program Design and Processes
- Tools or Partnerships for Enabling Access to Verified Customer Information