**CPUC Docket:** A.26-01-003 et al.
**Exhibit Number:** TURN-07
**Date:** November 25, 2026

# A.26-01-003 et al.

# Ex. TURN-07

PG&E responses to TURN DR 10, Questions 2-7

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

| | |
|---|---|
| **PG&E Data Request No.:** | TURN_010-Q002 |
| **PG&E File Name:** | IQPPY28-33_DR_TURN_010-Q002 |
| **Request Date:** | October 30, 2026 |
| **Requester DR No.:** | 010 |
| **Requesting Party:** | The Utility Reform Network |
| **Requester:** | Reina L. Yanagiba |
| **Date Sent:** | November 16, 2026 |
| **PG&E Witness(es):** | Jenny Wu |

**SUBJECT: CARE/FERA**

**QUESTION 002**

PG&E's rebuttal testimony at p. 2-17 discusses its proposed PEV document upload platform. PG&E states that "if implemented at scale, PG&E envisions that the platform could ultimately reduce total PEV costs by reducing existing process-related expenses."

a. Please explain how PG&E envisions the platform could ultimately reduce costs.

b. Which current PEV steps and expenses would the new PEV platform replace?

c. How does PG&E estimate the PEV cost per customer would change with the PEV platform deployed at scale? Please provide the (i) current cost, (ii) estimated cost during the interim (pilot/ramp up), and (iii) estimated cost after full platform implementation.

d. Please provide the underlying calculations and assumptions for the cost estimates provided in (c).

**ANSWER 002**

a. PG&E envisions that the platform could increase the number of customers who successfully submit required PEV documentation on their first attempt, thereby reducing total PEV costs such as those associated with incomplete PEV and re-enrollment. For example, successful first-time submission could reduce customer service interactions associated with incomplete submissions and the number of times a PEV requires additional processing. In addition, PEV cost reductions could also be achieved by avoiding costs associated with applying retroactive bill credits and re-enrolling customers who are removed from the program due to incomplete PEV but later reapply.

b. PG&E does not expect the platform to replace existing PEV processes or expenses. Please see PG&E's responses to IQPPY28-33_DR_TURN_009-Q005a, IQPPY28-33_DR_TURN_005-Q002c, and subpart (a) above.

c. Please see PG&E's response to IQPPY28-33_DR_TURN_005-Q002a for the (i) current estimated PEV cost per customer. PG&E does not currently have estimated PEV costs per customer for (ii) interim or (iii) full implementation, as the pilot has just fully launched at the end of October 2026. Please also see PG&E's to IQPPY28-33_DR_TURN_005-Q002e.

d. Please see PG&E's response IQPPY28-33_DR_TURN_005-Q002.

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| | |
|---|---|
| **PG&E Data Request No.:** | TURN_010-Q003 |
| **PG&E File Name:** | IQPPY28-33_DR_TURN_010-Q003 |
| **Request Date:** | October 30, 2026 |
| **Requester DR No.:** | 010 |
| **Requesting Party:** | The Utility Reform Network |
| **Requester:** | Reina L. Yanagiba |
| **Date Sent:** | November 16, 2026 |
| **PG&E Witness(es):** | Jenny Wu |

**SUBJECT: CARE/FERA**

**QUESTION 003**

PG&E's rebuttal testimony at p. 2-18 discusses its proposed PEV document upload platform. PG&E states that "If the platform does not achieve the anticipated results, PG&E requests flexibility to apply the authorized budget to other PEV process improvements, particularly as technologies evolve and additional tools emerge to address customer barriers." Please clarify this statement:

a. What technologies does PG&E anticipate will evolve?

b. What additional tools does PG&E anticipate will emerge?

**ANSWER 003**

PG&E objects to this question to the extent that it calls for speculation and is vague and ambiguous to the extent that it seeks specific examples. Notwithstanding the objection, PG&E responds as follows.

a. PG&E's statement cited above is a general statement to acknowledge that generally, technologies and tools change and advance over time. However, PG&E has not currently identified any specific technologies or tools that could address customer barriers in the future. Furthermore, PG&E cannot speculate as to what those technologies or tools may be or which technologies will evolve.

   Since technologies and tools generally change and advance quickly over time, PG&E requests flexibility to allow PG&E to apply the authorized budget to other PEV process improvements that address customer barriers if the document upload platform does not achieve the anticipated results.[1]

b. See PG&E's response above.

[1] Exhibit (PG&E-04), p. 2-18, lines 5-8,

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**Income Qualified Programs – Program Years 2028-2033**
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|---|---|
| **PG&E Data Request No.:** | TURN_010-Q004 |
| **PG&E File Name:** | IQPPY28-33_DR_TURN_010-Q004 |
| **Request Date:** | October 30, 2026 |
| **Requester DR No.:** | 010 |
| **Requesting Party:** | The Utility Reform Network |
| **Requester:** | Reina L. Yanagiba |
| **Date Sent:** | November 16, 2026 |
| **PG&E Witness(es):** | Hali Burbige |

**SUBJECT: CARE/FERA**

**QUESTION 004**

PG&E's rebuttal testimony at p. 2-18 discusses its determination of capitation payments for CARE and FERA based on feedback from CBOs.

a. In the previous IQPs cycle, what was the average outreach cost per enrollee for enrollees introduced to (i) CARE and (ii) FERA through PG&E's general marketing? Please show cost estimates and assumptions.

b. In the previous IQPs cycle, what was the average outreach cost per enrollee for enrollees introduced to (i) CARE and (ii) FERA through CBO capitation?

c. If the answers to (a) and (b) differ, please explain why this might be the case. In PG&E's view, why is outreach through PG&E or CBOs generally more or less costly on a per-enrollee basis?

**ANSWER 004**

PG&E objects to this request as vague and ambiguous as to the terms "general marketing" and "introduced to." Subject to and without waiving this objection, PG&E responds based on the following interpretations:

*Program cycle:* PG&E interprets "previous IQP cycle" to mean the 2021–2026 program cycle. PG&E provides results for completed program years 2021 through 2025. PG&E does not include 2026 because outreach campaigns build on one another throughout the year, and a partial-year figure would not be representative.

*General marketing:* PG&E interprets "general marketing" to include all CARE and FERA outreach activities, as recorded in the Outreach category of PG&E's IQP Annual Reports. The Outreach category includes ME&O as well as other

outreach-related costs, such as CBOs and community engagement and customer and operational support.1

a. PG&E is unable to provide the average outreach cost per enrollee introduced to CARE and FERA through general marketing efforts because it does not attribute enrollments to individual outreach tactics or channels and does not budget or track outreach expenditures at that level. Because PG&E's CARE and FERA Marketing Education & Outreach (ME&O) is a multi-channel, multi-touch program, customers typically receive several communications across different channels before enrolling, and many enrolled through self-service channels such as online applications or the contact center. As a result, PG&E cannot identify which enrollments resulted from "general marketing" or isolate the costs associated with them. Instead, PG&E provides the overall outreach cost per CARE and FERA enrollee across all outreach activities in Table 1. This is an overall figure that includes all outreach activities to acquire and retain customers.

**Table 1: CARE and FERA Average Outreach Cost per Enrolled Household, 2021-2025**[2]

| Year | Recorded CARE Outreach Expenditures | CARE Enrolled Households (year-end) | CARE Average Outreach Cost per Enrolled Household | Recorded FERA Outreach Expenditures | FERA Enrolled Households (year-end) | FERA Average Outreach Cost per Enrolled Household |
|---|---|---|---|---|---|---|
| 2021 | $6,007,492 | 1,550,993 | $3.87 | $2,262,717 | 38,862 | $58.22 |
| 2022 | $4,503,161 | 1,469,724 | $3.06 | $2,792,378 | 36,652 | $76.19 |
| 2023 | $4,469,503 | 1,402,942 | $3.19 | $2,623,703 | 38,295 | $68.51 |
| 2024 | $3,344,453 | 1,371,555 | $2.44 | $1,964,527 | 39,262 | $50.04 |
| 2025 | $3,498,659 | 1,390,392 | $2.52 | $1,991,062 | 49,207 | $40.46 |

**2** Outreach expenditures and year-end enrolled households as reported in PG&E's IQP Annual Report, 2021 [Summary Table and CARE Table 1], PG&E's FERA 2021 Annual Report [Table 3], and PG&E's IQP Annual Reports 2022-2025 [Summary Table, CARE Table 1 and FERA Table 1].

**2** Outreach expenditures and year-end enrolled households as reported in PG&E's IQP Annual Report, 2021 [Summary Table and CARE Table 1], PG&E's FERA 2021 Annual Report [Table 3], and PG&E's IQP Annual Reports 2022-2025 [Summary Table, CARE Table 1 and FERA Table 1].

Furthermore, PG&E believes that this average does not provide a meaningful view of outreach costs, or of the cost of enrolling a customer through any particular channel, for the following reasons:

1. **Enrolled households include customers from all channels.** Recorded enrollment includes customers enrolled through the COC capitation program, automatic enrollment through data sharing, self-service channels, and direct marketing. The average therefore does not measure the cost of "general marketing," and it includes the capitation enrollments addressed in subpart (b).
2. **Enrolled households include customers who enrolled in prior years.** Most customers enrolled at year-end did not enroll that year. The average spreads one year's spending across customers who enrolled over many years, so it does not reflect the cost of enrolling any one customer.
3. **Outreach funds more than enrollment.** PG&E's outreach expenditures fund activities in addition to enrollment such as retention outreach.[3] Some of that spending reaches customers who are already enrolled, and some reaches customers who are not eligible or do not enroll.
4. **Enrollment depends on factors outside ME&O.** Enrollment levels are affected by eligibility rules, percentage savings amounts, attrition, and customer circumstances such as changes in household income. For example, FERA enrollment increased in 2025 primarily because SB 1130 expanded eligibility, not because of a change in ME&O spending.[4]
5. **Shared costs are allocated mostly to CARE.** CARE and FERA outreach is planned jointly, and shared costs are allocated by cost driver.[5] Because shared materials, such as the combined CARE/FERA application and joint campaign efforts, are predominantly allocated to CARE, FERA figures reflect only the portion of shared costs allocated to FERA. They do not reflect the full cost of outreach that reached FERA customers.

a. PG&E does not have the average outreach cost per enrollee introduced to CARE and FERA through the Community Outreach Contractors (COC) Capitation Program for the 2021-2026 program cycle because participating CBOs are compensated on a fixed fee-per-enrollment basis and their agreements do not include reimbursement for marketing or outreach expenses. As a result, PG&E does not track and has no visibility into the outreach costs incurred by individual CBOs beyond the $30 per new enrollment in CARE and FERA in the 2021-2026 program cycle.[6]

Please also see the response to subpart (a).

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[3] PG&E response to TURN DR 3, Q18 (IQPPY28-33_DR_TURN_003-Q018).

[4] Exhibit (PG&E-04), pp. 3-8 to 3-9 and footnote 41.

[5] PG&E response to TURN DR 9, Q12 (IQPPY28-33_DR_TURN_009-Q012).

[6] The Commission authorized the increase for the Capitation fee from $20 up to $30 per enrollment for the 2021-2026 IQP program cycle D.21-06-015, p.474 OP 14.

b. The figures in subparts (a) and (b) are different measures, therefore, they should not be compared as a cost per enrollee or as an indication of whether outreach through PG&E or through CBOs is more or less costly, for the following reasons:

- *Different measures:* The figures in subpart (a) divide total Outreach expenditures by all households enrolled at year-end. Because the Outreach category includes community engagement costs, the subpart (a) figures also include a portion of PG&E's CBO-related costs. Most of those households enrolled in prior years, and they enrolled through all channels, including the COC Capitation Program. The figure in subpart (b) is a fee paid for a single new enrollment. Because the two figures use different denominators, a lower figure in subpart (a) does not indicate that general marketing costs less per enrollment than the capitation channel.
- *Different scope of activities:* PG&E's ME&O reaches the full eligible population and funds retention, recertification, and customer education in addition to acquisition.[7] COC Capitation Program-related costs are tied to *new* enrollments acquired through grassroots outreach activities that tend to be more labor intensive reaching much lower volume.
- *Costs borne by CBOs:* The capitation fee reflects PG&E's payment only. CBOs have reported that the current fee does not reasonably compensate them for the effort needed to identify, educate, and assist customers. This is the basis for PG&E's proposed increase to the capitation fee.[8]
- *Scale and interdependence:* The COC Capitation Program is a complementary channel that accounts for less than one percent of new CARE enrollments.[9] Customers enrolled through CBOs may also have been exposed to PG&E's broader outreach before enrolling.

[7] Exhibit (PG&E-01E), Chapter 2, Section I.2.

[8] Exhibit (PG&E-04), pp. 2-18 to 2-21; See also PG&E's response to IQPPY28-33_DR_CalAdvocates_004-Q008.

[9] Exhibit (PG&E-04), p. 2-20.

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| | |
|---|---|
| **PG&E Data Request No.:** | TURN_010-Q005 |
| **PG&E File Name:** | IQPPY28-33_DR_TURN_010-Q005 |
| **Request Date:** | October 30, 2026 |
| **Requester DR No.:** | 010 |
| **Requesting Party:** | The Utility Reform Network |
| **Requester:** | Reina L. Yanagiba |
| **Date Sent:** | November 16, 2026 |
| **PG&E Witness(es):** | Jenny Wu |

**SUBJECT: CARE/FERA**

**QUESTION 005**

PG&E's rebuttal testimony at p. 3-7 discusses implementation of the Base Services Charge (BSC). Please provide PG&E's Q3 2026 BSC quarterly implementation metrics, as provided to the Demand Flexibility service list on 10/30/2026.

**ANSWER 005**

PG&E's Q3 2026 BSC quarterly implementation metrics, served in Demand Flexibility R.22-07-005 on 10/30/2026, is available at http://pgera.azurewebsites.net/Regulation/ValidateDocAccess?docID=892780.

PG&E notes that, while PG&E's Q3 BSC quarterly implementation metrics report contains FERA-related information specific to average bill impact and enrollment count, it does not provide information about the overall FERA program enrollment rate. As PG&E explains in its Rebuttal Testimony, program enrollment rate is determined by both enrollment count and the total eligible population, such that an increase in enrollment count does not proportionally increase the program's overall enrollment rate.[1]

Furthermore, the BSC implementation metrics are aggregated on quarterly basis and the report submitted on October 30, 2026, is limited to the first through third quarters of 2026. Because this reporting period does not include data prior to BSC implementation in March 2026, it does not provide sufficient basis to appropriately compare FERA enrollment pre- and post-BSC to assess any effect of BSC marketing efforts on FERA enrollment. Rather than relying on this limited, partial-year quarterly data, PG&E provides a more granular data of its FERA enrollment rate on monthly basis before and after BSC implementation in its Rebuttal Testimony.2 PG&E's program data shows no

[1] Exhibit (PG&E-04), pp.3-5 through 3-7.

[2] Exhibit (PG&E-04), p.3-8, Table 3-2.

material changes in PG&E's FERA enrollment rate pattern following BSC implementation and does not support TURN's assertion that BSC marketing efforts and a higher effective discount due to BSC would result in the level of growth proposed by TURN.

As PG&E states in its Rebuttal Testimony, PG&E acknowledges the importance of ME&O investments to "reaching eligible customers and sustaining enrollment."[3] PG&E also reiterates—based on program data and experience—that ME&O investments are not the sole driver of program enrollment.[4] Please also see PG&E's response to IQPPY28-33_DR_TURN_010-Q006.

[3] Exhibit (PG&E-04), p.3-8.

[4] Exhibit (PG&E-04), p. 3-9 and Exhibit (PG&E-01E), pp. 3-12 through 3-14.

| | Metric | Q2 2024 | Q3 2024 | Q4 2024 | Q1 2025 | Q2 2025 | Q3 2025 | Q4 2025 | Q1 2026 | Q2 2026 | Q3 2026 | Q4 2026 | Q1 2027 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| (h) | **ME&O dollars spent** | | | | | | | | | | | | |
| h.1 | Research | | | $ 13,035 | $ 57,700 | $ 81,859 | $ 37,508 | $ 30,913 | $ 19,505 | $ 25,131 | $ 4,337 | | |
| h.2 | Web | | | | $ 292 | $ 2,620 | $ 4,026 | $ 4,447 | $ 2,822 | $ 3,251 | | | |
| h.3[1] | Collateral | | | | | | | | | | | | |
| h.4 | CBOs | | | | $ 666 | $ 587 | $ 912 | $ 652 | $ 2,522 | $ 99,851 | $ 1,425 | | |
| h.5 | Paid Media | | | | | | | $ 498,626 | $ 443,292 | $ 43,553 | $ 9,125 | | |
| h.6[2] | Bill Messaging | | | | | | | | | | | | |
| h.7[5] | Direct Communications | | | | | | | $ 430,680 | $ (7,086) | | $ 111,641[6] | | |
| h.8 | Integrated Communications | | | | $ 326 | $ 130 | $ 456 | $ 32,908 | $ 5,271 | $ 5,841 | $ 70,834[7] | | |
| h.9 | Agency Support | | | $ 26,075 | $ 34,590 | $ 9,969 | $ 15,989 | $ 51,030 | $ 135,617 | $ 47,856 | $ 3,128 | | |
| h.10[4] | Internal Labor | $ 15,745 | $ 67,677 | $ 78,297 | $ 48,553 | $ 80,870 | $ 86,779 | $ 70,997 | $ 89,279 | $ 104,341 | $ 64,633 | | |
| h.11[3] | Deed Restricted Affordable Housing Outreach | | | | $ 391 | $ 20,498 | $ 23,405 | $ 2,945 | $ (2,503) | | $ 3,452 | | |
| h.12[3] | Non-Paid Media | | | | | | | | | | | | |

***Footnotes***

[1] Collateral costs are contained under Integrated

[2] Bill Messaging costs fall under implementation

[3] Deed Restricted Affordable Housing Outreach and Non-Paid Media rows are exclusive to PG&E

[4] Q2 2024 column added to report internal labor expense in June

[5] Direct Communications include direct mail and email expenses

[6] Expenses include production and postage costs for Best

[7] Expenses include production and postage costs for NEM True-Up BSC outreach

| | | Q3 2024 | | | Q4 2024 | | | Q1 2025 | | | Q2 2025 | | | Q3 2025 | | | Q4 2025 | | | Q1 2026 | | | Q2 2026 | | | Q3 2026 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Metric | July | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sep |
| (Res1)[1] | **Number of visits to dedicated website** | | | | | | | | | | | | 186 | 232 | 511 | 427 | 430 | 596 | 161,890 | 378,396 | 290,977 | 246,072 | 106,042 | 95,786 | 30,926 | 27,446 | 17,162 | 13,181 |
| (d) | **Number of press article mentions** | 5 | 5 | 6 | 2 | 2 | 3 | 8 | 4 | 3 | 7 | 3 | 2 | 1 | 5 | 2 | 3 | 2 | 3 | 9 | 2 | 18 | 5 | | 1 | 5 | 3 | 4 |
| (e) | **Impressions and reach of paid media**[3] | | | | | | | | | | | | | | | | | | 3,163,391 | 47,990,013 | 47,713,609 | 33,176,535 | 15,988,021 | 37,713,405 | | | | |
| (f) | **Number and type of outbound targeted communications and bill messages** | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | **Direct Mail - Sent** | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.1 | Tier1 CARE | | | | | | | | | | | | | | | | | | | 208,004 | | 14,831 | 7,146 | 6,237 | 3,707 | 3,853 | 6,339 | 5,034 |
| f.2 | Tier2 FERA | | | | | | | | | | | | | | | | | | | 20,790 | 21,913 | 19,220 | 67,912 | 66,322 | 25,280 | 25,210 | 25,262 | 27,346 |
| f.3[2] | Tier2 DRAH | | | | | | | | | | | | 5,727 | | 4,876 | 202[2] | | | | 7,846 | | | | | | | | |
| f.4 | Tier3 | | | | | | | | | | | | | | | | | | | 623,051 | | | 3,110,000[6,8] | | | | | 135,939[13] |
| f.5 | All Tiers | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.5.1 | Multi accounts | | | | | | | | | | | | | | | | | | | 4,849 | | | | | | | | |
| f.5.2 | Master meter | | | | | | | | | | | | | | | | | | | 248 | | | | | | | | |
| | **Email Communications** | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.1 | Tier1 CARE - Sent | | | | | | | | | | | | | | | | | 58,567[4] | 72,519[4] | 965,144 | 59,420 | 131,782[5] | 245,166 | 228,465 | 181,756 | 254,181 | 205,677 | 227,104 |
| f.1.1[1] | Tier1 CARE - Open rate | | | | | | | | | | | | | | | | | 62.68%[4] | 58.47%[4] | 63.34% | 59.43% | 58.21%[5] | 63.00% | 62.00% | 63.00% | 62.00% | 59.00% | 45.00% |
| f.1.2[1] | Tier1 CARE - Click-through rate | | | | | | | | | | | | | | | | | 9.48%[4] | 8.66%[4] | 2.28% | 13.07% | 9.51%[5] | 9.00% | 8.00% | 7.00% | 7.00% | 8.00% | 5.00% |
| f.2 | Tier2 FERA - Sent | | | | | | | | | | | | | | | | | 547[4] | 42,932[4] | 84,000 | 24,903 | 21,064 | 60,998 | 50,776 | 63,200 | 28,833 | 28,084 | 28,720 |
| f.2.1[1] | Tier2 FERA - Open rate | | | | | | | | | | | | | | | | | 63.43%[4] | 60.06%[4] | 65.16% | 57.68% | 53.91% | 59.00% | 59.00% | 59.00% | 58.00% | 58.00% | 56.00% |
| f.2.2[1] | Tier2 FERA - Click-through rate | | | | | | | | | | | | | | | | | 4.93%[4] | 3.65%[4] | 2.80% | 4.19% | 3.79% | 4.00% | 3.00% | 3.00% | 4.00% | 4.00% | 4.00% |
| f.3 | Tier2 DRAH - Sent | | | | | | | | | | | | 12,670 | | 11,554 | | | | | 29,264 | | | | | | | | |
| f.3.1[1] | Tier2 DRAH - Open rate | | | | | | | | | | | | 69.03% | | 69.96% | | | | | 60.66% | | | | | | | | |
| f.3.2[1] | Tier2 DRAH - Click-through rate | | | | | | | | | | | | 5.91% | | 5.45% | | | | | 1.57% | | | | | | | | |
| f.4 | Tier3 - Sent | | | | | | | | | | | | | | | | | | | 2,722,263 | 4,842,105[10] | 1,936,931[7,11] | 480,812 | 559,442[9] | N/A[12] | 989,326[14] | 857,673[15] | 1,059,927[16] |
| f.4.1[1] | Tier3 - Open rate | | | | | | | | | | | | | | | | | | | 69.99% | 53.58%[10] | 36.88%[11] | 58.40% | | N/A[12] | N/A[14] | 67.24%[15] | 62.69%[16] |
| f.4.2[1] | Tier3 - Click-through rate | | | | | | | | | | | | | | | | | | | 1.59% | 1.43%[10] | .13%[11] | 1.61% | | N/A[12] | .08%[14] | 4.88%[15] | 3.18%[16] |
| f.5 | All Tiers | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.5.1 | Multi accounts - Sent | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.5.1.1[1] | Multi accounts - Open rates | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.5.1.2[1] | Multi accounts - Click-through rates | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.5.2 | Master meter - Sent | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.5.2.1[1] | Master meter - Open rates | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.5.2.2[1] | Master meter - Click-through rates | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.6 | Bill Message | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.6.1 | On Bill Message | | | | | | | | | | | | | | | | | | 4,586,150 | 4,979,401 | 4,553,313 | 5,101,185 | 5,429,697 | 4,905,472 | 5,031,607 | 5,818,909 | 4,634,399 | 5,292,447 |
| f.6.2 | Bill Insert | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.6.3 | Bill Onsert | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| f.6.4 | Envelope | | | | | | | | | | | | | | | | | | | | | 2,900,000 | | | | | | |

***Color Coding***

***Gray shading: N/A; No metrics available for this period.***

***Footnotes***

1 Number of visits to dedicated website and Email Open & Click-through rate metrics added in Resolution

2 Unmatched Properties outreach mailed on 9/12/2025

3 For Paid Media, only impressions are tracked; reach is PG&E territory-wide

4 Added Nov and Dec 2025 CARE FERA email metrics during Q1 2026 MEO report submission; integrated message performance data is not comparable to dedicated BSC email performance data.

5 The CARE email metrics line in March 2026 includes data for both the CARE and FERA Welcome and Post-Enrollment Verification campaign outreach; CARE vs. FERA deployments cannot be separated, ~90–95% of these communications go to CARE customers; integrated message performance data is not comparable to dedicated BSC email performance data.

6 Tier3 Direct Mail metrics for Home Energy Reports deployed in March 2026 will not be available until the campaign ends in May.

7 Tier3 Emails March data; Solar Monthly and True Up Bill email open and click-through rates are not tracked

8 Tier3 Direct Mail April data includes Print Home Energy Reports cycle dates for Standard messaging 3/23/26-5/5/26 and Solar messaging 4/19/26-5/31/26

9 Tier3 Emails May data; Solar Monthly and True Up Bill email open and click-through rates are not tracked

10 Tier3 Q1 email metrics in February include Home Energy Reports for cycle date (2/1/26-3/7/26 cycle) and residential e-Newsletter

11 Tier3 Q1 email metrics in March include Home Energy Reports for cycle date (3/8/26-4/4/26 cycle) and Solar Monthly and True-Up Bill emails

12 Tier3 Q2 email metrics for Home Energy Reports for cycle date (6/7/26-7/4/26) will not be available until August.

13 Tier3 Direct Mail September data includes Best Rate outreach

14 Tier3 Email July data includes Solar EHER, Kubra Monthly and True-Up bill emails. We do not have open and click metrics for Kubra emails.

15 Tier3 Email August data includes NEM True-Up, Kubra Monthly and True-Up bill emails. We do not have open and

16 Tier3 Email Sept data includes Best Rate and Kubra True-Up bill emails. We do not have open and click metrics for Kubra emails.

| | Metric | Q4 2024 | Q1 2025 | Q2 2025 | Q3 2025 | Q4 2025 | Q1 2026[1] | Q2 2026 | Q3 2026 |
|---|---|---|---|---|---|---|---|---|---|
| **(a)** | **Number of customers in each tier** | | | | | | | | |
| a.1 | Tier1 CARE | | | | | | 1,210,109 | 1,197,575 | 1,206,688 |
| a.2 | Tier2 FERA | | | | | | 52,298 | 55,085 | 58,111 |
| a.3 | Tier2 DRAH | | | | | | 51,788 | 53,877 | 61,982 |
| a.4 | Tier3 | | | | | | 3,707,417 | 3,763,102 | 3,755,573 |
| **(b)** | **Number of customers who change tiers[5]** | | | | | | | | |
| b.1 | Changed to Tier1 (New enrollments in CARE) | | | | | | 17,292 | 37,586 | 52,957 |
| b.2 | Changed to Tier2 (New Enrollments in FERA) | | | | | | 1,863 | 5,055 | 5,601 |
| b.3 | Changed to Tier2 (New Enrollments in DRAH) | | | | | | 747 | 2,310 | 9,513[6] |
| b.4 | Changed to Tier3 (Unenrollment in CARE/FERA/DRAH) | | | | | | 12,296 | 43,784 | 34,124 |
| **(g)** | **Number of related calls OR emails received[2]** | | | | | | | | |
| g.1 | Number of related calls | 0 | 6 | 59 | 66 | 1,058[3] | 5,387 | 6,997 | 6,929 |
| g.2 | Number of emails received | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **(i)** | **Number of customers who were asked to verify their incomes through the CARE and FERA programs** | | | | | | | | |
| i.1 | CARE | | | | | | 36,692 | 21,809 | 34,412 |
| i.2 | FERA | | | | | | 614 | 405 | 507 |
| **(j)** | **Number of customers who successfully verified their incomes through the CARE and FERA programs** | | | | | | | | |
| j.1 | CARE | | | | | | 56,743[4] | 43,767[4] | 39,311 |
| j.2 | FERA | | | | | | 2,207[4] | 2,059[4] | 1,900 |

***Color Coding*** ***Gray shading: N/A; No metrics available for this period.***

***Footnotes***

[1] Most Operational data began in Q1 2026 post implementation March 1, 2026.

[2] Based on the IOU's discretion either calls **OR** emails will be reported.

[3] Outbound Robo-call DRH self-attestation campaign completed to 1,330 customers; and, proactive on-bill, online account and media messaging launched December 2025.

[4] "Provided proof" counts all income documentation received during the quarter (including reinstatements and agency-assisted submissions such as ESA/LIHEAP/REACH), not just customers newly requested to provide proof.

[5] Reflects service agreements whose BSC designation changed between the prior quarter-end and the most recent quarter-end. The comparison represents a point-in-time snapshot taken on the final day of each quarter.

[6] Increased DRAH counts are reflective of CHP annual update completion.

| | Metric | Q1 2026 | Q1 2026 | Q2 2026 | Q2 2026 | Q3 2026 | Q3 2026 | Q4 2026 | Q4 2026 | Q1 2027 | Q1 2027 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Rates Effective | 3/1/26 | 3/1/26 | 3/1/26 | 3/1/26 | 3/1/26 | 3/1/26 | | | | |
| | **Bundled Non-CARE Implied Volumetric Rate Reductions** | **Avg kWh Use[1]** | **$/kWh** | **Avg kWh Use[1]** | **$/kWh** | **Avg kWh Use[1]** | **$/kWh** | **Avg kWh Use[1]** | **$/kWh** | **Avg kWh Use[1]** | **$/kWh** |
| | Residential Average Rate - With BSC | | $ 0.34 | | $ 0.34 | | $ 0.39 | | | | |
| | Residential Average Rate - Without BSC (Estimated) | | $ 0.39 | | $ 0.39 | | $ 0.39 | | | | |
| | Residential Average Rate - Volumetric Rate Reduction (Implied) | | $ (0.05) | | $ (0.05) | | $ (0.05) | | | | |
| | **Estimated Monthly Bill Impacts** | **Avg kWh Use[1]** | **$/Month** | **Avg kWh Use[1]** | **$/Month** | **Avg kWh Use[1]** | **$/Month** | **Avg kWh Use[1]** | **$/Month** | **Avg kWh Use[1]** | **$/Month** |
| c.1 | **Tier 1 CARE** | | | 411.29 | $ (7.61) | 597.36 | $ (13.69) | | | | |
| | Territory P | 646 | $ (12.32) | 535 | $ (8.44) | 664 | $ (12.18) | | | | |
| | Territory Q | 689 | $ (13.72) | 526 | $ (8.47) | 498 | $ (7.70) | | | | |
| | Territory R | 444 | $ (5.90) | 514 | $ (7.60) | 884 | $ (18.27) | | | | |
| | Territory S | 448 | $ (6.08) | 452 | $ (5.79) | 688 | $ (12.57) | | | | |
| | Territory T | 325 | $ (2.77) | 270 | $ (1.00) | 271 | $ (1.13) | | | | |
| | Territory V | 413 | $ (5.47) | 337 | $ (3.02) | 314 | $ (2.40) | | | | |
| | Territory W | 363 | $ (3.43) | 520 | $ (7.87) | 954 | $ (20.18) | | | | |
| | Territory X | 408 | $ (4.90) | 338 | $ (2.58) | 389 | $ (4.14) | | | | |
| | Territory Y | 638 | $ (12.04) | 542 | $ (8.93) | 585 | $ (10.34) | | | | |
| | Territory Z | 589 | $ (11.27) | 444 | $ (6.66) | 380 | $ (4.84) | | | | |
| c.2 | **Tier 2 FERA** | | | 432 | $ (5.99) | 635 | $ (14.28) | | | | |
| | Territory P | 694 | $ (18.03) | 574 | $ (11.86) | 734 | $ (18.95) | | | | |
| | Territory Q | 812 | $ (23.67) | 635 | $ (15.22) | 600 | $ (13.63) | | | | |
| | Territory R | 465 | $ (7.16) | 527 | $ (9.34) | 939 | $ (27.45) | | | | |
| | Territory S | 479 | $ (7.93) | 471 | $ (6.94) | 740 | $ (18.73) | | | | |
| | Territory T | 373 | $ (3.64) | 301 | $ (0.22) | 296 | $ (0.04) | | | | |
| | Territory V | 488 | $ (8.99) | 385 | $ (4.04) | 351 | $ (2.51) | | | | |
| | Territory W | 345 | $ (1.58) | 491 | $ (7.86) | 977 | $ (28.84) | | | | |
| | Territory X | 445 | $ (6.44) | 370 | $ (2.73) | 429 | $ (5.39) | | | | |
| | Territory Y | 668 | $ (16.72) | 569 | $ (11.91) | 617 | $ (14.23) | | | | |
| | Territory Z[2] | 884 | $ (28.19) | 726 | $ (20.66) | 358 | $ (3.22) | | | | |
| c.3 | **Tier 2 DRAH** | | | 192 | $ 2.26 | 237 | $ 0.13 | | | | |
| | Territory P | 325 | $ (3.04) | 240 | $ 0.97 | 313 | $ (2.26) | | | | |
| | Territory Q[2] | 699 | $ (24.90) | 323 | $ (2.98) | 167 | $ 4.45 | | | | |
| | Territory R | 231 | $ 1.27 | 233 | $ 1.27 | 396 | $ (6.10) | | | | |
| | Territory S | 224 | $ 1.62 | 204 | $ 2.65 | 288 | $ (1.10) | | | | |
| | Territory T | 220 | $ 1.79 | 180 | $ 3.73 | 181 | $ 3.82 | | | | |
| | Territory V | 237 | $ 1.00 | 137 | $ 5.74 | 118 | $ 6.73 | | | | |
| | Territory W | 261 | $ (0.09) | 332 | $ (3.55) | 482 | $ (10.06) | | | | |
| | Territory X | 222 | $ 1.69 | 174 | $ 4.02 | 202 | $ 2.84 | | | | |
| | Territory Y | 333 | $ (3.43) | 191 | $ 3.22 | 253 | $ 0.52 | | | | |
| | Territory Z | N/A | N/A | N/A | N/A | N/A | N/A | | | | |
| c.4 | **Tier 3** | | | 298 | $ 8.90 | 423 | $ 2.85 | | | | |
| | Territory P | 469 | $ 0.52 | 342 | $ 8.22 | 505 | $ (0.14) | | | | |
| | Territory Q | 622 | $ (8.44) | 464 | $ 0.88 | 465 | $ 0.80 | | | | |
| | Territory R | 338 | $ 8.02 | 307 | $ 9.90 | 687 | $ (9.25) | | | | |
| | Territory S | 381 | $ 5.44 | 293 | $ 10.55 | 542 | $ (1.76) | | | | |
| | Territory T | 323 | $ 7.76 | 252 | $ 12.01 | 255 | $ 11.82 | | | | |
| | Territory V | 383 | $ 4.46 | 294 | $ 9.75 | 275 | $ 10.88 | | | | |
| | Territory W | 247 | $ 12.45 | 282 | $ 11.08 | 763 | $ (13.08) | | | | |
| | Territory X | 424 | $ 2.68 | 323 | $ 8.81 | 395 | $ 4.87 | | | | |
| | Territory Y | 382 | $ 5.72 | 328 | $ 8.90 | 387 | $ 5.62 | | | | |
| | Territory Z | 314 | $ 8.42 | 226 | $ 13.45 | 245 | $ 12.22 | | | | |

Changes QtoQ

| | Metric | Q1 2026 | | Q2 2026 | | Q3 2026 | | Q4 2026 | | Q1 2027 | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Rates Effective | | | | | | 3/1/26 | | | | |
| | **Bundled Non-CARE Implied Volumetric Rate Reductions** | | **$/kWh** | | **$/kWh** | | **$/kWh** | | **$/kWh** | | **$/kWh** |
| | Residential Average Rate - With BSC | | | | $ - | | $ - | | | | |
| | Residential Average Rate - Without BSC (Estimated) | | | | $ - | | $ - | | | | |
| | Residential Average Rate - Volumetric Rate Reduction (Implied) | | | | $ - | | $ - | | | | |
| | **Estimated Monthly Bill Impacts** | | **$/Month** | | **$/Month** | | **$/Month** | | **$/Month** | | **$/Month** |
| c.1 | **Tier 1 CARE** | | | | | | $ (6.08) | | | | |
| | Territory P | | | | $ 3.88 | | $ (3.73) | | | | |
| | Territory Q | | | | $ 5.25 | | $ 0.77 | | | | |
| | Territory R | | | | $ (1.70) | | $ (10.67) | | | | |
| | Territory S | | | | $ 0.29 | | $ (6.78) | | | | |
| | Territory T | | | | $ 1.76 | | $ (0.12) | | | | |
| | Territory V | | | | $ 2.45 | | $ 0.62 | | | | |
| | Territory W | | | | $ (4.44) | | $ (12.31) | | | | |
| | Territory X | | | | $ 2.31 | | $ (1.55) | | | | |
| | Territory Y | | | | $ 3.11 | | $ (1.41) | | | | |
| | Territory Z | | | | $ 4.61 | | $ 1.83 | | | | |
| c.2 | **Tier 2 FERA** | | | | | | $ (8.29) | | | | |
| | Territory P | | | | $ 6.17 | | $ (7.09) | | | | |
| | Territory Q | | | | $ 8.46 | | $ 1.59 | | | | |
| | Territory R | | | | $ (2.18) | | $ (18.11) | | | | |
| | Territory S | | | | $ 0.99 | | $ (11.79) | | | | |
| | Territory T | | | | $ 3.42 | | $ 0.18 | | | | |
| | Territory V | | | | $ 4.96 | | $ 1.52 | | | | |
| | Territory W | | | | $ (6.28) | | $ (20.98) | | | | |
| | Territory X | | | | $ 3.71 | | $ (2.66) | | | | |
| | Territory Y | | | | $ 4.81 | | $ (2.32) | | | | |
| | Territory Z | | | | $ 7.52 | | $ 17.44 | | | | |
| c.3 | **Tier 2 DRAH** | | | | | | $ (2.13) | | | | |
| | Territory P | | | | $ 4.01 | | $ (3.22) | | | | |
| | Territory Q[2] | | | | $ 21.92 | | $ 7.43 | | | | |
| | Territory R | | | | $ 0.00 | | $ (7.36) | | | | |
| | Territory S | | | | $ 1.03 | | $ (3.75) | | | | |
| | Territory T | | | | $ 1.94 | | $ 0.10 | | | | |
| | Territory V | | | | $ 4.74 | | $ 0.99 | | | | |
| | Territory W | | | | $ (3.45) | | $ (6.51) | | | | |
| | Territory X | | | | $ 2.34 | | $ (1.18) | | | | |
| | Territory Y | | | | $ 6.65 | | $ (2.70) | | | | |
| | Territory Z | | | | | N/A | | N/A | | | |
| c.4 | **Tier 3** | | | | | | $ (6.05) | | | | |
| | Territory P | | | | $ 7.71 | | $ (8.37) | | | | |
| | Territory Q | | | | $ 9.32 | | $ (0.09) | | | | |
| | Territory R | | | | $ 1.88 | | $ (19.15) | | | | |
| | Territory S | | | | $ 5.11 | | $ (12.31) | | | | |
| | Territory T | | | | $ 4.26 | | $ (0.19) | | | | |
| | Territory V | | | | $ 5.29 | | $ 1.13 | | | | |
| | Territory W | | | | $ (1.37) | | $ (24.16) | | | | |
| | Territory X | | | | $ 6.13 | | $ (3.94) | | | | |
| | Territory Y | | | | $ 3.18 | | $ (3.28) | | | | |
| | Territory Z | | | | $ 5.02 | | $ (1.23) | | | | |

*Bill impacts are illustrative in nature and leverage average consumption by quarter - Individual customer bills may differ materially and vary based on a variety of factors including individual usage and pricing plan. Estimated bill impacts represent bundled residential schedule E-1 rates. CARE and FERA scenarios reflect applicable discounts and exemptions. Excludes certain fees and CA Climate Credit.*

***Color Coding*** *Gray shading: N/A; No metrics available for this period.*

***Footnotes***

[1] Res avg usage is monthly RECORDED avg for the three month quarter e.g., Oct/Nov/Dec

[2] These are very low population segments and may have volatile results quarter-to-quarter.

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

| | |
|---|---|
| **PG&E Data Request No.:** | TURN_010-Q006 |
| **PG&E File Name:** | IQPPY28-33_DR_TURN_010-Q006 |
| **Request Date:** | October 30, 2026 |
| **Requester DR No.:** | 010 |
| **Requesting Party:** | The Utility Reform Network |
| **Requester:** | Reina L. Yanagiba |
| **Date Sent:** | November 16, 2026 |
| **PG&E Witness(es):** | Hali Burbige |

**SUBJECT: CARE/FERA**

**QUESTION 006**

PG&E's rebuttal testimony at p. 3-9 shows a graph (Figure 3-1) of FERA ME&O spending compared to total program enrollment.

a. Does PG&E contend that, generally, increased ME&O spending should increase program enrollment? Please explain why or why not.

b. Although PG&E's spending on FERA ME&O was higher in 2022 and 2023 than 2021, enrollment was slightly slower in those years. Does PG&E contend that ME&O strategies were less effective than PG&E expected in those years? Please explain why or why not.

c. Has PG&E observed a lag between when it carries out ME&O spending, and when that outreach impacts customer enrollment? Please explain why or why not. If yes, please explain the typical duration of lag observed by PG&E.

d. Why does PG&E believe it saw an increase in FERA enrollment in 2025 and 2026, even as its ME&O spending declined? Please identify each factor.

**ANSWER 006**

a. PG&E agrees that sustained ME&O investment is essential to reaching eligible customers and sustaining enrollment.[1] However, as discussed in PG&E's rebuttal and prepared direct testimony, increased FERA ME&O spending does not by itself produce proportionally higher FERA enrollment.[2] FERA enrollment results from the combined effect of audience targeting, channel mix, and customer journey

[1] Exhibit (PG&E-04), p. 3-8, lines 14–15.

[2] Exhibit (PG&E-04), p. 3-9, lines 1–3; Exhibit (PG&E-01E), p. 3-12, line 1 to p. 3-14, line 8.

communications, along with eligibility rules and benefit levels set outside PG&E's control.[3] The FERA Barriers Study found that awareness of income-based rate discounts among FERA-eligible customers is already high, and that additional marketing is likely to increase enrollment at an increasingly slower rate given the extent of PG&E's existing efforts.[4] PG&E therefore expects additional spending to produce diminishing incremental enrollment gains rather than a proportional increase.

b. No. Figure 3-1 was not presented to evaluate the effectiveness of ME&O strategies in any individual year. It illustrates that enrollment does not track spending levels alone. As shown in Figure 3-1, despite higher spending in 2021, 2022, and 2023, enrollment outcomes in those years did not outperform 2024, when spending was lower.[5] Total program enrollment is a net figure. It reflects both new enrollments and attrition, including customers removed through recertification or post-enrollment verification, customers who no longer meet eligibility requirements, and customers who close their accounts.[6] As shown in Figure 3-1, new FERA enrollments increased modestly from 2021 through 2023. Year-to-year changes in total enrollment therefore reflect attrition and eligibility dynamics in addition to outreach performance. Recertification and post-enrollment verification requirements also resumed following pandemic-era customer protections, which affected attrition in the years that followed.[7] Throughout this period, PG&E continued to test and refine its outreach approach, including audience targeting and multi-touch campaign sequencing.[8]

c. PG&E does not characterize the relationship between ME&O spending and customer enrollment as having a discrete or typical lag, and a lag duration would not be a meaningful measure of PG&E's outreach. PG&E's ME&O campaigns are generally continuous, multi-channel, and multi-touch, and customers may receive several communications across different channels before deciding to enroll. Accordingly, an enrollment may reflect the cumulative effect of multiple outreach activities, including outreach in prior years, rather than a single communication or spending event. In addition, the timing of a customer's enrollment often depends on circumstances unrelated to the timing of outreach, such as changes in household income that affect whether and when the customer is eligible, and the point at which the customer recognizes that they qualify.[9] Because these outreach activities occur on an ongoing and overlapping basis, PG&E does not expect a consistent one-to-one relationship between the timing of ME&O spending or outreach and the timing

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[3] Exhibit (PG&E-04), p. 3-9, lines 8–12.

[4] Exhibit (PG&E-01E), Ch. 3, p. 3-15, lines 1–4; Exhibit (PG&E-01E), Ch. 3, Attachment 1, FERA Barriers Study, pp. 3-Atch01-6, 3-Atch01-28 to 3-Atch01-29, and 3-Atch01-3.

[5] Exhibit (PG&E-04), p. 3-9, lines 6–8 and Figure 3-1. ME&O expenditures shown in Figure 3-1 reflect FERA expenditures as reported in the Outreach category of PG&E's IQP Annual and Monthly Reports.

[6] Exhibit (PG&E-04), p. 3-10.

[7] PG&E response to IQPPY28-33_DR_TURN_004-Q007.

[8] Exhibit (PG&E-01E), Ch. 3, Section H.2.b

[9] Exhibit (PG&E-01E), Ch. 3, Attachment 1, FERA Barriers Study, pp. 3-Atch01-6 to 3-Atch01-7.

of resulting enrollments. This is consistent with Figure 3-1, which illustrates that enrollment does not track spending levels alone.[10]

d. As an initial matter, PG&E's recorded FERA ME&O spending in 2025 was comparable to 2024 levels,[11] and the 2026 data in Figure 3-1 reflects January through August only.[12] The decline shown for 2026 therefore reflects a partial year rather than a full-year reduction.

   PG&E attributes the increase in FERA enrollment in 2025 and 2026 primarily to the following factors:

   1. **Eligibility expansion under SB 1130.** Beginning in January 2025, FERA eligibility expanded to one- and two-person households. PG&E's estimated eligible population increased from 156,547 in 2024 to 315,626 in 2025.[13] Approximately 39 percent of the 20,537 gross new FERA enrollments in 2025 (roughly 8,000 customers) came from the newly eligible population.[14] Enrollment among one- and two-person households increased from 7,547 at the end of 2025 to 14,461 as of August 2026.[15] PG&E noted in rebuttal that this growth has had a limited impact on the overall enrollment rate, which increased from 16 percent to 18 percent over the same period.[16]
   2. **Base Services Charge implementation.** The BSC took effect in March 2026, adding a discount for FERA customers. PG&E included FERA discount messaging in a multi-channel BSC customer communications campaign that largely concluded in June 2026.[17] As explained in PG&E's rebuttal testimony, "From January through the end of August in 2026, monthly net FERA [18]
   3. **Continued outreach optimization.** PG&E continued refining audience targeting and channel mix, including outreach directed to the newly eligible population.[19]

These factors show that changes in eligibility and program benefits, rather than ME&O spending levels alone, were the primary drivers of enrollment growth during this period.

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[10] Exhibit (PG&E-04), p. 3-9, lines 9–13 and Figure 3-1.

[11] A.19-11-003, PG&E FERA Program 2025 Annual Report, March 2026, FERA Table 3.1.1 (Outreach category).

[12] Exhibit (PG&E-04), p. 3-9, Figure 3-1.

[13] Exhibit (PG&E-04), p. 3-6, Tables 3-1A and 3-1B.

[14] Exhibit (PG&E-04), p. 3-7, lines 7-10 and footnote 32.

[15] Exhibit (PG&E-04), p. 3-5, lines 18–20 and footnote 31; p. 3-6, Tables 3-1B and 3-1C.

[16] Exhibit (PG&E-04), p. 3-5, line 25 to p. 3-6, line 1.

[17] Exhibit (PG&E-04), p.3-7, lines 17-20.

[18] RExhibit (PG&E-04), pp.3-8, Lines 1-8

[19] Exhibit (PG&E-01E), Ch. 3, Section H.2.b

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

| | |
|---|---|
| **PG&E Data Request No.:** | TURN_010-Q007 |
| **PG&E File Name:** | IQPPY28-33_DR_TURN_010-Q007 |
| **Request Date:** | October 30, 2026 |
| **Requester DR No.:** | 010 |
| **Requesting Party:** | The Utility Reform Network |
| **Requester:** | Reina L. Yanagiba |
| **Date Sent:** | November 16, 2026 |
| **PG&E Witness(es):** | Jenny Wu |

**SUBJECT: CARE/FERA**

**QUESTION 007**

PG&E's response to TURN DR 9, Q1 provided its (a) authorized and (b) completed PEV percentage in each year 2015-2025.

a. Please provide this data broken out by (i) traditional and (ii) high-usage PEV.

b. Please explain whether it is PG&E's understanding that the PEV cap only applies to traditional PEV and does not apply to high-usage PEV.[1]

**ANSWER 007**

a. Please see the table below with data broken out by (i) traditional and (ii) high-usage PEV.

| CARE PEV Selection Rates | | | |
|---|---|---|---|
| 2015 - 2025 | | | |
| **Program Year** | **Traditional** | **High Usage** | **Combined** |
| 2015 | 3.4% | 2.6% | 6.0% |
| 2016 | 2.9% | 2.7% | 5.6% |
| 2017 | 3.1% | 2.6% | 5.7% |
| 2018 | 3.4% | 1.6% | 5.0% |
| 2019 | 3.1% | 1.5% | 4.6% |
| 2020 [(a)] | n/a | n/a | n/a |
| 2021 | 2.5% | 2.3% | 4.8% |

[1] According to SCE response to TURN DR 9, Q1, Atch, high-usage PEV does not count against the PEV cap: "Advice Letter 2814-E established a seven percent maximum CARE post enrollment income verification rate effective December 27, 2012. D.17-12- 009, OP 85 subsequently directed the IOUs not to count High Usage Verification (HUV) requests toward the 7% verification threshold."

| | | | |
|---|---|---|---|
| 2022 | 6.7% | 1.3% | 8.0% |
| 2023 | 7.0% | 2.0% | 9.0% |
| 2024 | 7.0% | 1.5% | 8.5% |
| 2025 | 8.2% | 1.7% | 9.9% |

Source: PG&E's Income-Qualified Programs 2015-2025 Annual Reports, CARE Tables 3A and 3B

Note (a): PG&E paused PEV due to COVID-19 protections in response to CPUC Resolution M-4842 issued on April 17, 2020 https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M539/K164/539164300.PDF.

b. As part of an email clarification from TURN on November 9, 2026, TURN clarified that "TURN's question for PG&E is whether PG&E has the same interpretation as SCE with regards to PEV reporting." Consistent with SCE's interpretation of Decision (D.) 17-12-009 Ordering Paragraph (OP) 85 in Footnote 1 above, PG&E understands and applies the PEV cap solely to traditional PEV and not to high-usage PEV.