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Witness(es): Various

PACIFIC GAS AND ELECTRIC COMPANY

**CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE),
FAMILY ELECTRIC RATE ASSISTANCE (FERA), AND
ENERGY SAVINGS ASSISTANCE (ESA)
PROGRAMS AND BUDGETS APPLICATION FOR THE
2028-2033 PROGRAM YEARS**

REBUTTAL TESTIMONY



PACIFIC GAS AND ELECTRIC COMPANY
 CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE),
 FAMILY ELECTRIC RATE ASSISTANCE (FERA), AND
 ENERGY SAVINGS ASSISTANCE (ESA)
 PROGRAMS AND BUDGETS APPLICATION FOR THE
 2028-2033 PROGRAM YEARS (PYs)
 REBUTTAL TESTIMONY

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5	REBUTTAL TESTIMONY ON STUDIES AND EVALUATION, REPORTING, WORKING GROUPS, AND CONCURRENT APPLICATION SYSTEM	Iris Cheung Erik Olsen
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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
REBUTTAL TESTIMONY ON
INTRODUCTION

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
REBUTTAL TESTIMONY ON
INTRODUCTION

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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 1
REBUTTAL TESTIMONY ON
INTRODUCTION

This rebuttal testimony generally addresses policy issues identified by the California Public Utilities Commission (Commission) and raised by intervenors regarding Pacific Gas and Electric Company's (PG&E) Application for its California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), and Energy Savings Assistance (ESA) programs and budgets for program years 2028 through 2033, also known collectively as Income Qualified Programs (IQP).

A. Introduction [Witness: Marlene Murphy-Roach]

The following parties served intervenor testimony: California Emerging Technology Fund (CETF), Center for Accessible Technology (CforAT), County of Los Angeles, Energy Efficiency Council (EEC), National Consumer Law Center, Public Advocates Office at the California Public Utilities Commission (Cal Advocates), Sierra Club, and The Utility Reform Network (TURN).¹

PG&E's proposed 2028-2033 IQP portfolio is designed to deliver meaningful energy and bill savings benefits to income-qualified customers while balancing affordability for all customers, customer needs and experience, equity, safety, and California's clean-energy goals.

This chapter provides a roadmap to PG&E's rebuttal testimony. PG&E's rebuttal testimony is organized as follows:

- Chapter 1: Introduction;
- Chapter 2: CARE program;
- Chapter 3: FERA program;
- Chapter 4: ESA program; and
- Chapter 5: Measurement and Evaluation, Studies, Reporting, Working Groups and Concurrent Application System (CAS).

The witnesses supporting each chapter are identified in each chapter.

¹ All references to PG&E exhibits are to the testimony served on January 9, 2026, and as updated in PG&E's June 30, 2026, errata (PGE-01E), as well as Supplemental Testimony I (PG&E-02) served on July 10, 2026 and Supplemental Testimony II (PG&E-03) served on August 10, 2026.

As no party offered testimony specific to PG&E's proposed revenue requirement and cost recovery as detailed in Chapter 6, Revenue Requirements and Cost Recovery of its Opening Direct Testimony, PG&E has no rebuttal for Revenue Requirement and Cost Recovery for CARE, FERA, and ESA. However, PG&E provides rebuttal to intervenors' testimony relating to program budget and cost issues that are specific to CARE, FERA and/or ESA in Chapters 2, 3, and/or 4, respectively.

B. PG&E's Policy Framework and Response to Intervenor Recommendations

PG&E's 2028-2033 IQP proposals are designed to balance the needs and benefits of income-qualified customers while maintaining affordability for all customers. PG&E's proposals also reflect stakeholder engagement and the broader policy considerations described in its prepared testimony, including environmental and social justice (ESJ), Tribal outreach, decarbonization, safety, and customer experience.² PG&E incorporated stakeholder feedback into numerous proposals for the 2028-2033 program cycle and continue to support constructive stakeholder engagement throughout program implementation.

1. Overarching Themes From Intervenor's Testimony

CARE

Chapter 2 to this exhibit presents PG&E's rebuttal to both CARE-specific issues and issues where CARE and FERA overlap.

For both CARE and FERA, parties generally support PG&E's main program elements as proposed, corroborating the important role these programs play in supporting income-qualified households. However, parties raise issues with PG&E's Post Enrollment Verification (PEV) Upload Pilot³ and increased Community-Based Organization (CBO) capitation fees.⁴ PG&E maintains that finding breakthrough advancements in processes will reasonably require a test and learn mindset, with upfront investment and modification of status quo operations. Further discussion is included in Chapter 2, CARE.

² Exhibit (PG&E-01E), p. 1-6, line 22 to p. 1-8, line 7 and p. 1-11, line 11 to p. 1-16, line 22.

³ TURN-02, p. 25, line 1 to p. 26, line 9; CA-02, p. 3-7, line 1 to p. 3-8, line 4.

⁴ CA-02, p. 3-2, line 3 to p. 3-3, line 5.

FERA

Chapter 3 of this exhibit includes FERA-specific issues only. For FERA, TURN supports the overall direction of expanding FERA participation but disputes PG&E's assessment of what is achievable, arguing that the program's expanded eligibility, enhanced discount, and increased outreach funding warrant a substantially higher target.⁵ PG&E's proposal is informed by a third-party FERA Barriers study and evidence from its program operations since SB 1130 was implemented. Further discussion is included in Chapter 3, FERA.

ESA

Chapter 4 of this exhibit presents PG&E's rebuttal for issues relating to ESA. For ESA, parties raise issues with PG&E's proposals relating to electrification, standardization, fiscal control, and contractor/customer protections. Regarding electrification, parties such as Sierra Club and TURN are aligned and support California's pathway to carbon neutrality and the need to prioritize ESJ communities in the energy transition and decarbonization.⁶ On the other hand, Cal Advocates recommends the Commission remove electrification measures from PG&E's ESA plan. With some exceptions, PG&E generally agrees with Sierra Club and TURN that electrification measures should be included in ESA in light of California's climate, public-health, and equity policies.

Outside of electrification-related issues in ESA, other primary ESA topics for intervenors relate to standardization, fiscal controls, and contractor and customer protections. PG&E stresses the importance of operational flexibility, targeted eligibility, and reliance on existing administrative processes.

See PG&E's discussion in Chapter 4, ESA.

Cross-Cutting

Chapter 5 of this exhibit includes PG&E's rebuttal to issues related to working groups, workshops, evaluations, studies, CETF's broadband proposal, and common application system (CAS). PG&E generally agrees

⁵ TURN-02 p. 29, lines 9-14, p. 30, lines 1-2, p. 30, lines 14-15.

⁶ SC-01, p. 6, line 6 to p. 7, line 17. TURN-01, p. 19, lines 6-16.

with parties that there should be opportunities for meaningful and transparent stakeholder input into the program operations as well as for considering program adjustments during the program cycle. However, PG&E respectfully disagrees with the processes for stakeholder engagement and mid-cycle refinements that add additional administrative burden and add unnecessary costs to customers. See Chapter 5, Cross-Cutting Issues for a complete discussion.

C. Key Issues Addressed in PG&E's Rebuttal Testimony

See Table 1-1 for PG&E's summary of key issues.

**TABLE 1-1
SUMMARY OF KEY ISSUES IN THIS EXHIBIT**

Line No.	Chapter	Program	Key Issues Addressed
1	Chapter 2	CARE	Rebuttal for both CARE issues and CARE/FERA overlap issues. Issues include: Budget escalation; CHANGES budget and evaluation; PEV document upload pilot; CBO capitation fees.
2	Chapter 3	FERA	Rebuttal for FERA-specific issues only. CARE/FERA overlap issues are addressed in Chapter 2-CARE. Issues include: Enrollment targets.
3	Chapter 4	ESA	Rebuttal related to ESA. Issues include: Electrification, including fuel switching, reporting, and estimating customer bill savings; fund shifting rules; budget escalation; workforce education and training, and solicitations.
4	Chapter 5	Cross-Cutting	Rebuttal related to cross-cutting issues that may impact CARE, FERA and/or ESA. Issues include: Working groups, workshops, evaluations and studies, CETF's broadband access proposals, and CAS.

D. Conclusion

PG&E's proposed 2028-2033 IQP portfolio is designed to deliver CARE, FERA, and ESA benefits to income-qualified customers while balancing affordability, customer needs, operational effectiveness, equity, and California's broader energy policy objectives.

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
REBUTTAL TESTIMONY ON
CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAM

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
REBUTTAL TESTIMONY ON
CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAM

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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
REBUTTAL TESTIMONY ON
CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAM

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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 2
REBUTTAL TESTIMONY ON
CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAM

A. Introduction [Witness: Jenny Wu]

This rebuttal testimony responds to the direct testimony of Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN) and Center for Accessible Technology (CforAT), regarding Pacific Gas and Electric Company's (PG&E) Prepared Direct Testimony, and Supplemental Testimony I and II.¹

Party positions are summarized in Section B, while detailed party positions and PG&E's rebuttal are provided in the succeeding sections, by program.

This chapter presents PG&E's rebuttal to PG&E's California Alternate Rates for Energy (CARE) program, namely, the CARE administrative budget escalation rate, Community Help and Awareness of Natural Gas and Electric Services (CHANGES) program; and a policy framework for evaluating CARE categorical programs (see Section B.1). This chapter also includes CARE topics that overlap with PG&E's Family Electric Rate Assistance (FERA) programs. These topics include: the presentation of CARE/FERA program budget proposals; funding for a contract that supports Post-Enrollment Verification (PEV) process for customers; and capitation fee increases to improve program enrollment through Community Based Organizations (CBO) (see Section B.2).

B. Summary of Party Positions

1. Summary of Party Positions (CARE)

Cal Advocates, TURN, and CforAT offer testimony concerning the following CARE-specific topics:

¹ All references to PG&E exhibits are to the testimony served on January 9, 2026, and as updated in PG&E's June 30, 2026 errata (PG&E-01E), as well as Supplemental Testimony I (PG&E-02) served on July 10, 2026 and Supplemental Testimony II (PG&E-03) served on August 10, 2026.

Cal Advocates

- Cal Advocates recommends setting PG&E's CARE administrative budget based on actual 2025 spending, escalated by three percent annually.²

TURN

- TURN recommends increasing the CHANGES program budget to \$4.3 million annually.³
- TURN supports transferring management of the CHANGES program evaluation contract from PG&E to the California Public Utilities Commission (CPUC or Commission).⁴
- TURN supports retaining the current list of categorical programs for CARE for 2028-2033.⁵
- TURN recommends adopting Joint Advocates'⁶ Proposed Framework for evaluating categorical programs for CARE.⁷

CforAT

- CforAT recommends expanding the CHANGES program to include learnings from the CBO Pilot and expand it to customers with arrerages.⁸
- CforAT recommends increasing funding to at least the level authorized in Decision (D.) 26-07-007.⁹

2. Summary of Party Positions (CARE and FERA)

Cal Advocates and TURN offer testimony concerning the following topics that overlap with CARE/FERA:

² CA-02, p. 1-4, lines 1-4.

³ TURN-02, p. 31, line 21 to p. 34, line 4.

⁴ TURN-02, p. 34, line 1 to p. 35, line 8.

⁵ TURN-03, p. 3, lines 2-23.

⁶ CforAT, TURN, National Consumer Law Center and Sierra Club jointly filed opening and reply briefs on Definitional Questions collectively as the Joint Advocates (May 15, 2026 and June 5, 2026, respectively).

⁷ TURN-03, p. 1, line 21 to p. 2, line 7.

⁸ CforAT Intervenor Testimony, pp. 19-20.

⁹ CforAT Intervenor Testimony, p. 24.

Cal Advocates

- Cal Advocates recommends rejecting PG&E's funding request for the CARE/FERA PEV document upload platform.¹⁰
- Cal Advocates recommends denying PG&E's proposed CARE and FERA capitation fee increases and associated budget requests.¹¹

TURN

- TURN recommends that the Investor-Owned Utilities (IOUs)¹² use the escalation recommendations in Exhibit TURN-01 when presenting CARE and FERA program costs.¹³
- TURN recommends denying PG&E's funding request for the CARE/FERA PEV document upload platform.¹⁴
- TURN recommends requiring PG&E to seek funding for the PEV document upload platform through the advice letter (AL) process after demonstrating the pilot's success.¹⁵

C. Uncontested Issues

No party offered testimony related to:

- Maintaining current CARE income eligibility guidelines;¹⁶
- Maintaining PG&E's current CARE enrollment goal of 93 percent;¹⁷
- Maintaining PG&E's current CARE enrollment and recertification processes;¹⁸
- Maintaining PG&E's current PEV selection cap;¹⁹

¹⁰ CA-02, p. 3-7, line 1 to p. 3-8, line 4.

¹¹ CA-02, p. 3-2, line 3 to p. 3-3, line 5.

¹² The IOUs are PG&E, San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas).

¹³ TURN-02, p. 26, line 11 to p. 27, line 10.

¹⁴ TURN-02, p. 26, lines 3-4.

¹⁵ TURN-02, p. 26, lines 4-6.

¹⁶ Exhibit PG&E-01E, p. 2-10, lines 21-24.

¹⁷ Exhibit (PG&E-01E), p. 2-13, line 10 to p. 2-14, line 10.

¹⁸ Exhibit (PG&E-01E), p. 2-19, line 15 to p. 2-20, line 22; p. 2-24, line 25 to p. 2-25, line 8.

¹⁹ Exhibit (PG&E-01E), p. 2-29, lines 1-16.

- 1 • Authorizing PG&E's proposed CARE Marketing, Education, and Outreach
2 (ME&O) Strategy for 2028-2033;²⁰
- 3 • Continuing and funding PG&E's CBO Grant Program and CBO and
4 community engagement strategies;²¹
- 5 • Modifying and/or sunseting a subset of CARE compliance items that have
6 become obsolete.²²

7 **D. CARE Administrative Budget Escalation Rate**

8 **1. PG&E Position**

9 PG&E proposes approximately \$71.4 million for CARE program
10 administration for 2028-2033 to provide program delivery, support ME&O
11 strategies, CBO partnerships and engagement efforts, and funding for the
12 CHANGES program.²³

13 **2. Party Position**

14 Cal Advocates recommends that the Commission set PG&E's CARE
15 administrative budget for 2028-2033 based on actual 2025 spending,
16 escalated by three percent annually, instead of adopting PG&E's proposed
17 budget, which is based on forecasted costs.²⁴ Cal Advocates states that
18 PG&E has consistently underspent its authorized CARE administrative
19 budgets while continuing to meet or exceed CARE enrollment goals.²⁵
20 According to Cal Advocates, "[u]sing recent actual spending would better
21 align authorized funding with PG&E's demonstrated administrative needs."²⁶
22 Cal Advocates further states that applying a three percent annual escalation
23 rate would be consistent with the Commission's approach in D.26-07-007
24 and would provide a reasonable allowance for increased administrative
25 costs.²⁷

20 Exhibit (PG&E-01E), p. 2-38, line 12 to p. 2-50, line 2.

21 Exhibit (PG&E-01E), p. 2-57, line 1 to p. 2-58, line 7.

22 Exhibit (PG&E-01E), p. 2-63, lines 1-9.

23 Exhibit (PG&E-01E), p. 2-63, line 10 to p. 2-64, Table 2-23.

24 CA-02, p. 1-4, lines 1-4.

25 CA-02, p. 1-3, lines 8-20.

26 CA-02, p. 1-4, lines 4-7.

27 CA-02, p. 1-4, lines 9-11.

3. PG&E Response

PG&E appreciates Cal Advocates' recognition that PG&E has managed its CARE administrative budget responsibly and improved operational efficiency without compromising its ability to meet program enrollment goals.²⁸ PG&E disagrees with Cal Advocates' recommendation to set PG&E's CARE administrative budget based on actual 2025 spending, escalated by three percent annually as the basis for determining a reasonable administrative budget for 2028-2033.

PG&E proposes its CARE administrative budget based on the activities necessary to administer the program, including application processing, marketing and outreach activities and PEV processes.²⁹ These activities are central to meeting program requirements and serving customers effectively. PG&E's proposed labor cost escalations are based on monitored wage trends and industry-specific price indices that reflect cost fluctuations pertinent to the utility sector as discussed in PG&E's 2027 General Rate Case (GRC) through a data response.³⁰

Under Cal Advocates' proposal, PG&E's CARE administrative budget would be reduced by approximately \$14 million for 2028-2033, or approximately \$1.7 million annually. To absorb this reduction, PG&E would need to decrease funding for program activities such as post-enrollment verification, retention, and marketing and outreach efforts. Reduced investment in these efforts could diminish customer awareness of CARE, lower enrollment of new eligible customers, and further reduce retention among existing participants. Collectively, these effects limit access to CARE for eligible households and negatively impact PG&E's ability to continue meeting or maintaining its 93 percent enrollment goal.

²⁸ CA-02, p. 1-3, lines 11-15.

²⁹ Exhibit (PG&E-01E), p. 2-64, Table 2-23..

³⁰ PG&E's Response to Data Request Cal Advocates_005-Q05, dated 7/10/26 in Attachment A, at the end of this chapter.

In addition, Cal Advocates' proposed budget reduction does not account for CPUC Staff's proposed increases to the CHANGES program,³¹ which is a fixed-cost component within PG&E's administrative budget that PG&E does not have discretion to adjust. If the Commission approves additional funding for CHANGES (see Section E), a larger share of the authorized budget would be allocated to CHANGES. As a result, the proposed across-the-board reduction to the CARE administrative budget could further limit PG&E's ability to fund discretionary program activities, including outreach and other program administration functions necessary to support enrollment and retention, maintain an enrollment rate at or above 93 percent, and provide effective service to CARE customers.

For the reasons discussed above, PG&E respectfully requests that the Commission reject Cal Advocates' recommendation and approve PG&E's CARE budget proposed, as detailed in its Direct Prepared Testimony.³²

E. CHANGES Program

1. CHANGES Program Budget

a. PG&E Position

PG&E proposes a CHANGES budget of \$525 thousand annually, or approximately \$3.2 million for 2028-2033.³³ This proposal is based on the 2019-2021 CHANGES Program Evaluation,³⁴ which found no definitive evidence supporting an expansion of funding, but the evaluation also noted that a longer assessment period may be necessary to fully evaluate funding needs due to the impact of

³¹ CPUC, Consumer Affairs Branch and External Affairs Division, Recommended Modifications to the Community Help Assistance with Natural Gas & Electric Services (CHANGES) Program (May 20, 2026), available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M607/K356/607356441.PDF> (accessed Oct. 8, 2026).

³² Exhibit (PG&E-01E), Chapter 2.

³³ Exhibit (PG&E-01E), p. 2-32, lines 7-13 and Table 2-8.

³⁴ Opinion Dynamics, 2019-2021 CHANGES Program Process Evaluation Study – Final Report (2019-2021 CHANGES Program Evaluation) (June 2023), available at: <https://pda.energydataweb.com/#/documents/2807/view> (accessed Oct. 9, 2026).

COVID-19 on program demand.³⁵ The proposed budget reflects PG&E's 30 percent share of the total CHANGES Program costs.³⁶

b. Party Position(s)

TURN

TURN supports increasing CHANGES funding to approximately \$4.3 million annually as recommended in the Staff Proposal,³⁷ arguing that the program is successful but underfunded.³⁸ TURN also supports maintaining the existing utility cost share and recovering CHANGES costs through CARE administrative budgets.³⁹ Table 2-1 shows the Staff Proposed Budget along with PG&E's CHANGES budget forecast.

**TABLE 2-1
ADDITIONAL CARE ADMINISTRATIVE BUDGET UNDER STAFF PROPOSAL**

Line No.	CHANGES Budget	2028	2029	2030	2031	2032	2033	2028-2033 Total
1	Staff Proposed Budget	\$4,244,900	\$4,202,738	\$4,263,060	\$4,324,613	\$4,387,421	\$4,451,511	\$25,874,243
2	PG&E's 30% share of Staff Proposed Budget	\$1,273,470	\$1,260,821	\$1,278,918	\$1,297,384	\$1,316,226	\$1,335,453	\$7,762,273
3	PG&E Proposed Budget in A.26-01-003 (30% share)	\$525,000	\$525,000	\$525,000	\$525,000	\$525,000	\$525,000	\$3,150,000
4	Additional Budget in Excess of PG&E Proposed Budget	\$748,470	\$735,821	\$753,918	\$772,384	\$791,226	\$810,453	\$4,612,273

CforAT

CforAT recommends that the Commission expand the CHANGES program and increase its funding to at least the level authorized in D.26-07-007,⁴⁰ or approximately \$2.6 million for 2027.⁴¹ Table 2-2 shows CforAT's Proposed Budget along with PG&E's CHANGES budget forecast.

³⁵ Exhibit (PG&E-01E), p. 2-33, lines 8-12.

³⁶ Exhibit (PG&E-01E), p. 2-33, lines 4-8.

³⁷ TURN-02, p. 32, lines 14-15.

³⁸ TURN-02, p. 32, line 15 to p. 33, line 19.

³⁹ TURN-02, p. 34, lines 1-4.

⁴⁰ CforAT Intervenor Testimony, p. 24.

⁴¹ D.26-07-007, p. 55.

TABLE 2-2
ADDITIONAL CARE ADMINISTRATIVE BUDGET UNDER CFORAT PROPOSAL BASED ON
D.26-07-007

Line No.	CHANGES Budget	2028	2029	2030	2031	2032	2033	2028-2033 Total
1	CforAT Proposed Budget	\$2,605,300	\$2,605,300	\$2,605,300	\$2,605,300	\$2,605,300	\$2,605,300	\$15,631,800
2	PG&E's 30% share of CforAT Proposed Budget	\$781,590	\$781,590	\$781,590	\$781,590	\$781,590	\$781,590	\$4,689,540
3	PG&E Proposed Budget in A.26-01-003 (30% share)	\$525,000	\$525,000	\$525,000	\$525,000	\$525,000	\$525,000	\$3,150,000
4	Additional Budget in Excess of PG&E Proposed Budget	\$256,590	\$256,590	\$256,590	\$256,590	\$256,590	\$256,590	\$1,539,540

CforAT also supports continuing CHANGES funding through CARE,⁴² but recommends that the Commission revisit the funding mechanism during the next full program cycle if data indicates that a significant number of participants are not eligible for CARE.⁴³

c. PG&E Response

PG&E does not take a position on what is the appropriate budget amount for the CHANGES budget, as CHANGES is a program administered solely by the Commission but encourages the Commission to consider affordability in its determination. As shown in Tables 2-1 and 2-2, adoption of either proposal reduces the administrative funding available to support CARE program operations by more than \$4.6 million or \$1.5 million, respectively, over the 2028-2033 program cycle.

As mentioned in Section D above, because CHANGES funding is included within the CARE administrative budget and represents a fixed cost that PG&E does not control, any increase in CHANGES funding without corresponding budget augmentation further reduces the funds available for CARE program activities. This could require PG&E to scale back program activities including customer outreach, enrollment and retention efforts, and other activities that support effective program delivery. Accordingly, if the Commission approves a CHANGES funding level that exceeds PG&E's proposed budget for the 2028-2033 program cycle, PG&E requests authorization to recover the additional costs

⁴² CforAT Intervenor Testimony, p. 25.

⁴³ CforAT Intervenor Testimony, p. 25.

necessary to fund the final approved CHANGES budget to avoid adverse impacts on CARE program operations and customer service. According to TURN's and CforAT's proposals, the additional costs would increase PG&E's proposed budget for 2028-2033 program cycle from \$71.4 million to \$76 million or \$72.9 million, respectively.

For the reasons discussed above, should the Commission adopt an increased CHANGES budget, PG&E requests Commission authorization to recover the addition costs necessary to fund the final approved CHANGES budget.

2. Consolidation of the CHANGES Program and CBO Pilot

a. PG&E Position

PG&E's intent is to ensure the evaluation findings of the CBO Pilot⁴⁴ are applied correctly. The findings demonstrated that the pilot required an implementation cost of \$4,381,000 to achieve a total debt reduction of \$195,000, with no statistically significant impact on disconnection rates.⁴⁵ PG&E recommends that any decision regarding program expansion or modifications rely directly on these documented evaluation results.

b. Party Position

CforAT recommends expanding the eligibility and target population of the CHANGES Program to include arrears case management.⁴⁶ Further, CforAT argues that expanding CHANGES' eligibility to any customer with arrearages over 90 days old—and combining the funding streams—will maximize ratepayer funds and meaningfully expand debt assistance.⁴⁷

⁴⁴ Impact Evaluation for the Community Based Organization Arrears Case Management Pilot (CBO Pilot Impact Evaluation), (September 2025). Verdant Associates and Grounded Research. Available at: https://www.calmac.org/publications/CBO_Pilot_Impact_Evaluation_final_20260901.pdf (accessed Oct. 12, 2026).

⁴⁵ CBO Pilot Impact Evaluation, p. 10.

⁴⁶ CforAT Intervenor Testimony, pp. 18-25.

⁴⁷ *Ibid.*

1 **c. PG&E Response**

2 PG&E clarifies the data from the CBO pilot evaluation referenced in
3 CforAT's proposal. The evaluation report noted a small overall impact
4 on arrears and no statistically significant impact on customer
5 disconnections across the pilot as a whole.⁴⁸ The evaluation highlighted
6 specific variance among the participating CBOs:

- 7 • Out of the six participating CBOs, SCE's Community Action
8 Partnership of San Bernardino County (CAPSBC) was the single
9 CBO to record any debt relief, achieving an average arrearage
10 reduction of \$500 at a pilot cost of \$1,200 per participant (a benefit
11 to cost ratio of 0.4).⁴⁹ The evaluation attributed this outcome to
12 increased Low Income Home Energy Assistance Program (LIHEAP)
13 enrollments.⁵⁰
- 14 • Conversely, the evaluation noted no measurable impact on
15 arrears reductions for customers participating through PG&E's
16 partnership with Community Action Partnership of Kern (CAPK) or
17 SoCalGas's partnership with Fernandeno Tataviam Band of Mission
18 Indians (FTBMI), despite both being LIHEAP agencies.⁵¹

19 Because the specific operational mechanisms driving CAPSBC's
20 localized reduction remain unclear when compared to the CAPK and
21 FTBMI approaches, PG&E cautions against generalizing the pilot's
22 outcomes.

23 In summary, PG&E does not take a position on the design, scope,
24 or operational budget of the CHANGES program, which is administered
25 by the CPUC. PG&E urges the Commission to incorporate the empirical
26 findings of the CBO pilot evaluation.

48 CBO Pilot Impact Evaluation, pp. 9-10.

49 *Ibid.*

50 *Ibid.*

51 *Ibid.*, p. 10 and p. 14, Table 2-1.

1 F. Categorical Eligibility Policy Framework

2 1. PG&E Position

3 As stated in its Supplemental Testimony II, PG&E supports a
 4 Commission-led categorical eligibility policy framework, developed in
 5 coordination with relevant State agencies, to evaluate categorical program
 6 eligibility for CARE.⁵² In its Reply Brief on Definitional Questions, PG&E
 7 recommends that the Commission decline to adopt the policy framework
 8 proposed by the Joint Advocates for evaluating potential categorical
 9 programs due to ambiguity and impracticality in the proposed tests.⁵³ In its
 10 Supplemental Testimony II, PG&E states it is unable to fully assess how the
 11 Joint Advocates' framework would affect the existing list of categorical
 12 programs or resulting impacts on overall CARE program enrollment because
 13 "such an assessment requires clearly defined terms and access to
 14 participant income information, which PG&E does not have."⁵⁴

15 2. Party Position

16 TURN recommends that the Commission adopt the Joint Advocates'
 17 proposed framework for evaluating categorical programs, but does not
 18 recommend modifying the current list of categorical programs at this time.⁵⁵
 19 TURN presents a preliminary analysis using the Joint Advocates' proposed
 20 framework for evaluating "substantially the same" income and "qualifying
 21 unit" to determine whether a program could be categorically eligible for
 22 CARE.⁵⁶ TURN acknowledges the "preliminary nature" of its analysis⁵⁷ and
 23 recommends that the Commission conduct further analysis before making
 24 changes to the current list of categorical programs.⁵⁸

⁵² Exhibit (PG&E-03), p. 34, lines 16-18.

⁵³ Exhibit (PG&E-03), p. 29, lines 21-24.

⁵⁴ Exhibit (PG&E-03), p. 31, lines 12-16 (citation omitted).

⁵⁵ TURN-03, p. 3, lines 2-18.

⁵⁶ TURN-03, p. 1, line 21 to p. 2, line 2.

⁵⁷ TURN-03, p. 3, lines 19-21.

⁵⁸ TURN-03, p. 3, lines 22-23.

3. PG&E Response

PG&E does not reiterate its same positions from its Opening and Reply Briefs on Categorical Eligibility⁵⁹ or its Supplemental Testimony II.⁶⁰ However, PG&E appreciates TURN's effort to demonstrate how the Joint Advocates' proposal could be used to evaluate existing and potential categorical programs for CARE. Nevertheless, TURN's preliminary analysis provides limited practical value because it does not resolve the fundamental definitional issues that must be addressed for the proposed framework to be consistently and meaningfully applied. Specifically, TURN's preliminary analysis does not address concerns regarding access to customer income data, ambiguity around metrics such as "unique administrative efficiencies", and unsolved definitional questions related to "substantially the same", "income", and "household",⁶¹ all of which remain important to assessing the framework's applicability and practicality. See also PG&E's Opening and Reply Briefs and Supplemental Testimony II for more detail regarding fundamental definitional issues.⁶²

For the reasons discussed above, PG&E continues to recommend that the Commission decline TURN's recommendation to adopt the policy framework proposed by the Joint Advocates. Instead, PG&E respectfully requests the Commission lead the development of a policy framework that is consistent with the statutory requirements of CARE and ensures that CARE discounts serve households intended by the Legislature.⁶³

⁵⁹ PG&E's Opening Brief on Definitional Questions (May 15, 2026) and Reply Brief on Definitional Questions (June 5, 2026).

⁶⁰ Exhibit (PG&E-03), Section D.1, pp. 29-32.

⁶¹ Administrative Law Judge Ruling Directing Additional Party Record Development Related to Definitional Issues (June 29, 2026), p. 11.

⁶² PG&E's Opening Brief on Definitional Questions (May 15, 2026), Reply Brief on Definitional Questions (June 5, 2026), and Exhibit (PG&E-03), p. 29, line 16 to p. -32, line 22.

⁶³ Exhibit (PG&E-03), p. 31, line 8 to p. 32, line 2.

1 **G. CARE/FERA Budget Presentation**

2 **1. PG&E Position**

3 PG&E submits its budget proposals using Energy Division-approved
4 templates, which do not require costs to be presented both with and without
5 escalation. In addition to its testimony, PG&E provides detailed workpapers
6 supporting its budget proposals, including program budget forecasts and the
7 escalation assumptions underlying those forecasts, to facilitate the
8 Commission's evaluation of the proposals.

9 **2. Party Position**

10 TURN takes issue with the IOUs' budget presentation, use of differing
11 escalation rates, and methodologies across programs and cost categories,
12 arguing that the assumptions are not sufficiently justified and that the utilities
13 have not provided unescalated forecasts for comparison.⁶⁴ TURN further
14 states that the IOUs have not adequately explained how escalation rates are
15 applied within specific cost categories, resulting in a lack of transparency in
16 the forecasted budgets.⁶⁵ TURN recommends that the Commission require
17 the IOUs to: (1) provide budgets without escalation, budgets with
18 escalation, and isolate for any proposed escalation by program and cost
19 category for transparency,⁶⁶ and; (2) provide the methodology used to
20 calculate escalation by program and cost category and the justification for
21 the applied methodology.⁶⁷

22 **3. PG&E Response**

23 Contrary to TURN's assertion that PG&E's budget proposals lack
24 transparency, PG&E has provided substantial detail regarding its cost
25 assumptions, escalation rates, budget categories, and supporting rationale
26 in its Prepared Direct Testimony, workpapers, and data responses. For
27 example, in Chapter 2, Section M of its Prepared Direct Testimony, PG&E
28 explains that "[t]he cost estimates for marketing and outreach activities,

⁶⁴ TURN-02, p. 26, lines 13-17.

⁶⁵ TURN-02, p. 26, lines 17-19.

⁶⁶ TURN-02, p. 26, lines 17-19.

⁶⁷ TURN-02, p. 26, lines 19-20.

ongoing program processing, certification, recertification, and ... were derived from historical costs"⁶⁸ and that PG&E applies an "escalation rate of 3.75 percent for labor and 3 percent for non-labor for ongoing activities after 2028."⁶⁹ PG&E further explains that these escalation rates "[are] based on general wage increases and contract price adjustments observed in the CARE Program during the current 2021-2026 program cycle"⁷⁰ and supplements these explanations with detailed workpapers and data responses, including its response to Cal Advocates' question regarding PG&E's escalation rates.⁷¹ PG&E submits its budget proposals using Energy Division-approved templates and provides detailed workpapers to support the Commission's evaluation of its proposals.

For the reasons discussed above, PG&E's budget proposals are presented in compliance with the Commission's requirements and provide sufficient information to support the Commission's review. Accordingly, PG&E recommends that the Commission continue to defer to the Energy Division to develop budget proposal templates for future application cycles.

H. CARE/FERA PEV Upload Platform

1. PG&E Position

PG&E proposes \$2.7 million over the 2028-2033 program cycle (or \$450 thousand per year) for enhancing the channels used for PEV by way of a new platform to assist customers in uploading PEV documents.⁷² This platform is intended to improve the customer experience by enabling customers to submit the required qualifying documentation easier and thereby reduce the percentage of "incomplete" PEV submittals.⁷³ An "incomplete" PEV submittal is when a customer attempts to submit income documentation but is unsuccessful. As described in PG&E's Prepared

⁶⁸ Exhibit (PG&E-1E), p. 2-65, lines 2-7.

⁶⁹ Exhibit (PG&E-1E), p. 2-65, lines 8-9.

⁷⁰ Exhibit (PG&E-1E), p. 2-65, lines 9-12.

⁷¹ PG&E's Response to Data Request Cal Advocates_005-Q05, dated 7/10/26 in Attachment A, at the end of this chapter.

⁷² Exhibit (PG&E-01E), p.2-30, lines 5-11.

⁷³ Exhibit (PG&E-01E), p. 2-31, lines 6-14.

1 Direct Testimony, PG&E aims to test the efficacy of the platform to (1)
 2 reduce the PEV incomplete rate of 5.6 percent and (2) increase the PEV
 3 overall response rate of 34 percent.⁷⁴

4 In mid-September 2026, PG&E executed a contract and is working with
 5 the vendor to conduct a 12-to-18-month test, utilizing authorized funding for
 6 2026 and 2027. As described in its Prepared Direct Testimony, should the
 7 platform prove to be effective at improving PEV outcomes, (as measured by
 8 the metrics of (1) a decreased PEV incomplete rate and/or (2) an increased
 9 PEV response rate), PG&E will expand the platform to the 2028-2033
 10 program cycle.⁷⁵ As described in its Prepared Direct Testimony, PG&E will
 11 continue to explore other solutions that may simplify PEV for its customers,
 12 that could be implemented in parallel with the platform, or in lieu of the
 13 platform, should it not be proven to be successful.⁷⁶ It is important to have
 14 flexibility in the program so that PG&E can test out tools and solutions.
 15 PG&E respectfully notes that meaningful progress in removing barriers for
 16 customers to prove eligibility with ease, generally requires a test-and-learn
 17 approach, supported by upfront investment and sufficient operational
 18 flexibility. This approach enables PG&E to adopt new advancements that
 19 could benefit customers as they occur in a timely manner.

20 **2. Party Position(s)**

21 Cal Advocates

22 Cal Advocates requests the Commission reject PG&E's proposed
 23 multiyear implementation budget for the PEV platform because PG&E has
 24 not completed the test case needed to justify broader deployment.⁷⁷

25 Cal Advocates argues that PG&E needs to first complete the PEV platform
 26 pilot, evaluate the results, and demonstrate that it is effective and
 27 cost-effective before receiving six years of implementation funding.⁷⁸

28 Beyond saying the funding proposal should be rejected without prejudice,

⁷⁴ Exhibit (PG&E-01E), p. 2-30, line 30 to p. 2-31, line 5.

⁷⁵ Exhibit (PG&E-01E), p. 2-30, line 30 to p. 2-31, line 5.

⁷⁶ Exhibit (PG&E-01E), p. 2-31, line 6-14.

⁷⁷ CA-02, p. 3-7, lines 9-24.

⁷⁸ CA-02, p. 3-7, lines 15-20.

1 Cal Advocates does not offer how PG&E could seek approval for future
2 funding.⁷⁹

3 TURN

4 While TURN appreciates PG&E's focus on improving the PEV
5 completion rates and supports the aim of improving the PEV process that
6 the platform is envisioned to do,⁸⁰ TURN recommends that the Commission
7 deny PG&E's funding request for the new platform.⁸¹ TURN argues that the
8 proposed platform's benefits are unclear because PG&E has not estimated
9 its expected impact on response or completion rates.⁸² TURN also
10 describes concerns that the PEV platform could potentially increase overall
11 PEV costs.⁸³ Therefore, TURN requests the Commission remove the PEV
12 platform budget request from PG&E's proposed budget and instead require
13 PG&E to seek funding later through a Tier 2 AL process after results are
14 available.⁸⁴ If the Commission instead authorizes the funding, TURN
15 recommends that PG&E should be required to return the funds to customers
16 if the platform is not successful, rather than allowing PG&E to redirect the
17 money to unspecified alternatives.⁸⁵

18 **3. PG&E Response**

19 Cal Advocates

20 PG&E acknowledges that development and implementation of the
21 platform has only recently commenced with the executed vendor agreement
22 in mid-September 2026, and that a full-scale test and evaluation of the
23 results have not yet been completed. However, PG&E respectfully
24 disagrees with Cal Advocates' recommendation that the Commission should
25 reject the proposed multiyear implementation budget on that basis. This
26 IQP application is the appropriate procedural forum for PG&E to request

⁷⁹ CA-02, p. 3-8, lines 1-4.

⁸⁰ TURN 02, p. 25, lines 8-10.

⁸¹ TURN 02, p. 26, lines 3-4.

⁸² TURN 02, p. 25, lines 19-23.

⁸³ TURN 02, p. 25, lines 8-18.

⁸⁴ TURN 02, p. 26, line 4-6.

⁸⁵ TURN 02, p. 26, lines 6-9.

1 CARE and FERA program funding for the 2028-2033 program cycle.
2 Accordingly, PG&E has proposed the requested funding in this proceeding,
3 subject to the condition that the platform will be deployed at scale during
4 2028-2033 program cycle only if the pilot demonstrates successful results
5 based on measurable outcomes. Requiring a separate approval process for
6 implementation funding would impose unnecessary administrative
7 complexity and delay. PG&E should retain reasonable operational flexibility
8 to test, evaluate, and implement program improvements under existing
9 Commission requirements.

10 TURN

11 PG&E appreciates TURN's support for its efforts to improve PEV
12 completion rates. PG&E acknowledges that the platform is being
13 implemented currently, and test results are not yet available.⁸⁶ PG&E
14 therefore cannot presently quantify the platform's benefits, including its
15 effect on customer response and completion rates. The absence of final
16 results, however, does not establish that the platform lacks value; rather, the
17 pilot is specifically designed to measure and validate those benefits before
18 broader deployment.

19 PG&E also recognizes TURN's concern that the platform could increase
20 overall PEV costs. However, if implemented at scale, PG&E envisions that
21 the platform could ultimately reduce total PEV costs by reducing existing
22 process-related expenses, though it is too early in the implementation
23 process to determine.

24 PG&E opposes TURN's recommendation to require PG&E to seek
25 funding later through a Tier 2 AL, because such a process would introduce
26 additional delays and administrative time and complexity, which could
27 disrupt customers' continued access to a platform that supports PEV during
28 the next program cycle. In contrast, authorizing funding in this proceeding is
29 the more efficient and appropriate approach because it ensures that funding
30 is available if the pilot demonstrates successful results. As an alternative,
31 PG&E is amenable to submitting a Tier 1 AL reporting on the pilot's

⁸⁶ While PG&E has not yet tested the platform, the vendor reports results from other recent deployments of the platform that include customer satisfaction ratings of 4.5 out of 5 and up to 90% customer completion rates for income verification.

1 outcomes, thereby providing transparency without the delays and
2 complexities associated with TURN's proposal.

3 PG&E further opposes TURN's recommendation that authorized funds
4 be automatically returned to customers if the platform is unsuccessful. If the
5 platform does not achieve the anticipated results, PG&E requests flexibility
6 to apply the authorized budget to other PEV process improvements,
7 particularly as technologies evolve and additional tools emerge to address
8 customer barriers. Such operational flexibility would remain subject to
9 existing accountability requirements, including PG&E's obligations to track
10 and account for expenditures, report on implementation progress and
11 outcomes, and return any unspent funds to ratepayers through the annual
12 electric and gas true-up process.

13 PG&E appreciates stakeholders' comments and respectfully requests
14 that the Commission authorize funding for the PEV platform as part of
15 PG&E's 2028-2033 program cycle, subject to continued reporting and
16 oversight. This allows PG&E to move efficiently based on successful pilot
17 results to support deployment, with the goal of improving customer
18 experience and reducing barriers to successful PEV completion, while
19 preserving accountability for ratepayer funds.

20 **I. CARE/FERA Capitation Fee Increases**

21 **1. PG&E Position**

22 PG&E proposes increasing the CARE and FERA capitation fees from
23 \$30 to \$40⁸⁷ and \$30 to \$60,⁸⁸ respectively, to test whether enhanced
24 compensation improves CBO engagement and enrollment outcomes.⁸⁹ As
25 stated in PG&E's Prepared Direct Testimony, the proposed increases are in
26 response to CBOs' feedback, via an informal survey, for reasonable
27 compensation for resources and efforts to enroll eligible customers.⁹⁰

⁸⁷ Exhibit (P&GE-01E), p. 2-55, lines 17-21.

⁸⁸ Exhibit (PG&E-01E), p. 3-40, line 28 to p. 3-41, line 19.

⁸⁹ Exhibit (PG&E-01E), p. 2-55, line 17 to p. 2-56, line 20; p. 3-41, lines 1-19.

⁹⁰ Exhibit (PG&E-01E), p. 2-55, line 17 to p. 2-56; p. 3-41, lines 1-19.

2. Party Position

Cal Advocates recommends that the Commission deny PG&E's proposed capitation fee increases, arguing PG&E has not sufficiently demonstrated that the proposed capitation fee increases are "necessary or a cost-effective" option to improve program enrollment.⁹¹ Cal Advocates contends that because only 14 of PG&E's 37 CARE Outreach Contractors (COC) completed a survey that resulted in PG&E proposing an increase in the capitation fee, that these survey results are not based on a sufficiently large enough pool to be utilized.⁹²

3. PG&E Response

PG&E's proposed capitation fee increases are designed to respond to CBO input and help determine whether enhanced compensation can improve CBO participation and improve program enrollment outcomes. As PG&E states in its Prepared Direct Testimony,⁹³ feedback from participating CBOs indicates that the current compensation levels do not adequately reflect the level of effort and compensation required to identify, educate, and enroll eligible CARE and FERA customers. PG&E acknowledges that the precise impact of the proposed fee increases cannot be known in advance. However, the effectiveness of a revised compensation model also cannot be assessed without implementation. Therefore, implementation of the proposed fee structure is required to evaluate whether enhanced incentives improve CBO enrollment outcomes.

PG&E acknowledges Cal Advocates' concern regarding the number of survey respondents. However, the survey achieved a 38% response rate (14 of 37 CBOs), which is generally considered a strong level of participation for a voluntary external stakeholder survey.⁹⁴ Moreover, the survey population consisted of a relatively small, targeted group of CBOs with direct

⁹¹ CA-02, p. 3-2, line 17 to p. 3-3, line 5.

⁹² CA-02, p. 3-2, lines 5-16.

⁹³ Exhibit (PG&E-01E), p. 2-56, lines 4-7 and 11-16.

⁹⁴ Sogolytics, Good Survey Response Rate: Benchmarks, Calculation & Ways to Improve (updated Aug. 27, 2026), "What is a Good Survey Response Rate?" External customer surveys have response rates between 10% and 30%, available at: <https://www.sogolytics.com/learning-center/surveys/what-is-a-good-survey-response-rate/> (accessed Oct. 13, 2026).

1 experience administering outreach and enrollment activities. As such, the
 2 responses provide valuable firsthand insights from organizations that
 3 interact directly with the communities they serve. PG&E maintains that
 4 proposals that respond to direct feedback from community partners, such as
 5 the proposed capitation fee increases informed by CBO input, help build
 6 trust, strengthen partnerships with trusted CBOs, and demonstrates PG&E's
 7 commitment to continuing enrollment efforts among hard-to-reach
 8 customers.

9 In addition, PG&E's Capitation Fee Program represents a very small
 10 component of CARE outreach, accounting for less than one percent of new
 11 enrollments.⁹⁵ The proposed fee increase is therefore a targeted low-cost
 12 investment rather than a material expansion of outreach spending. Even at
 13 the proposed \$40 CARE capitation level, the entire program budget would
 14 comprise less than 0.02 percent of PG&E's proposed CARE outreach
 15 budget.⁹⁶ Similarly for FERA, at the \$60 proposed amount, the entire
 16 program budget would comprise less than 0.002 percent of PG&E's
 17 proposed FERA outreach budget.⁹⁷ Given this minimal cost exposure, the
 18 proposal is a prudent way to test whether modestly higher compensation
 19 can improve CBO participation and enrollment outcomes among
 20 hard-to-reach customers.

21 PG&E's increased capitation proposal helps build trust and strengthens
 22 partnerships with trusted CBOs because it (1) demonstrates PG&E's
 23 commitment to compensating CBOs for continuing enrollment efforts among
 24 hard-to-reach customers, and (2) responds to direct feedback from
 25 community partners.

26 For the reasons discussed above, PG&E respectfully requests that the
 27 Commission approve the proposed CARE and FERA capitation fee

⁹⁵ Exhibit (PG&E-01E), p. 2-52, lines 9-12.

⁹⁶ Exhibit (PG&E-01E), p. 2-36, Table 2-10 shows proposed outreach budget of \$27,598,000 for 2028-2033 and p. 2-56, Table 2-16 shows the proposed COC program costs at \$40 per enrollment of \$444,000 for the 2028-2033 program cycle.

⁹⁷ Exhibit (PG&E-01E), p. 3-37, Table 3-12 shows proposed outreach budget of \$17,902,000 for 2028-2033 and p. 3-41, Table 3-14 shows the proposed COC program costs at \$60 per enrollment of \$27,000 for the 2028-2033 program cycle.

increases during the 2028-2033 program cycle to support and encourage
CARE and FERA enrollment through the capitation program.

J. Conclusion

For the reasons discussed above, PG&E recommends that the Commission
approve PG&E's CARE and CARE/FERA proposals, including:

- the CARE administrative budget,
- the CHANGES program,
- a policy framework for categorical programs,
- presentation of CARE/FERA program budget proposals,
- the CARE/FERA PEV document upload platform, and CARE/FERA
capitation fees.

Approval of PG&E's proposals would support continued effective program
administration, improve customer enrollment and retention efforts, and enable
reliable delivery of program benefits throughout the 2028-2033 program cycle.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 2

ATTACHMENT A

CARE PROGRAM

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

PG&E Data Request No.:	CalAdvocates_005-Q005
PG&E File Name:	IQPPY28-33_DR_CalAdvocates_005-Q005
Request Date:	June 29, 2026
Requester DR No.:	CalAdv-KH-PG&E-2026-02
Requesting Party:	Public Advocates Office
Requester:	Ke Hu
Date Sent:	July 10, 2026
PG&E Witness(es):	Jenny Wu

QUESTION 005

Please provide all data supporting PG&E's proposed annual labor escalation rate of 3.75 percent and annual non-labor escalation rate of 3 percent:

- a) Actual annual labor costs for the CARE Program in the past 5 years, broken down by labor category;
- b) The annual percentage change in labor costs for each category;
- c) All historical data, calculations, analyses, and workpapers demonstrate how the observed wage increases and contract price adjustments were used to derive the proposed escalation rates of 3.75 percent for labor and 3 percent for non-labor costs.

ANSWER 005

PG&E objects to the request as unduly burdensome as it requests all historical data, calculations, analyses, and workpapers to demonstrate how the observed wage increases and contract price adjustments were used to derive the proposed escalation rates of 3.75 percent for labor and 3 percent for non-labor costs. Subject to and without waiving this objection, as general matter, PG&E's responds as follows:

- a. PG&E's proposed annual labor escalation rate follows the 3.75% enterprise-wide annual labor escalation rate proposed in its 2027 General Rate Case (GRC). Please refer to 2027 GRC, A.25-05-009, Exhibit (PGE-8), Chapter 3, Labor Escalation section, pages 3-32 to 3-34, Table 3-6 'Proposed Wage Increases.'
- b. Please see subpart (a).
- c. Please see subpart (a) for questions concerning annual escalations for labor.

PG&E's proposed annual escalate rate of 3% for non-labor costs, which balances rate affordability and inflationary pressure, is below the price increases observed during the current program cycle and is in-line with the Commission's decision in the 2027 IQP Bridge Funding Proceeding.¹ Examples of observed general inflationary trends and specific costs increases are provided below.

The Consumer Price Index (CPI) published by the U.S. Bureau of Labor Statistics serves as a benchmark for overall prices changes in the economy. From 2021 through 2024, the annual CPI increase ranged from 2.8% to 6.3%, averaging 4.1% (Table 1).

Table 1: CPI Changes (2021-2024)

Year	CPI Annual	Change	% Change
2021	304.602	12.001	4.1%
2022	323.900	19.298	6.3%
2023	334.662	10.762	3.3%
2024	343.886	9.224	2.8%

Source: U.S. Bureau of Labor Statistics. (Series ID CWURS49BSA0).

One example of a specific price change is rising postage rates. In 2025, the costs for mailing CARE program materials increased by more than 3% when the United States Postal Services (USPS) implemented new rates across several mail classes (Table 2). Because postal mail remains an important channel for communicating program information with income-qualified customers, these price increases directly affect CARE program administration costs.

Table 2: Postage Rate Change by Mail Class (2025)

Rate	Old	New (July 13, 2025)	% Change
Presort	\$ 0.6122	\$ 0.6602	7.84%
Full Rate	\$ 0.69	\$ 0.78	13.04%
Marketing	\$ 0.4140	\$ 0.4662	12.61%

Similarly, higher prices were also observed in marketing and outreach activities during the current program cycle. For example, the effective cost per thousand impressions (eCPM),² which represents the cost to PG&E to deliver 1,000 paid media impressions, increased between 3% to 18% annually between 2021 and

¹ Decision 26-07-007 at p.17. The Commission states that "it is reasonable to utilize 2024 actual spend, plus application of three years of three percent escalation (an increase of 9.27 percent)" to determine the 2027 CARE administrative budget.

² eCPM is a metric for comparing media costs using the same "cost per 1,000 ad views" measure. When eCPM increases from one year to the next, it means an entity has to pay more to deliver the same amount of advertising exposure, even if the campaign goal or audience remains similar.

2025 (Table 3). These cost increases reflect ongoing upward cost pressures associated with reaching CARE customers.

Table 3: CARE Media eCPM (2021-2025)

Year	eCPM	% Change
2021	\$ 4.10	NA
2022	\$ 4.83	18%
2023	\$ 5.02	4%
2024	\$ 5.52	10%
2025	\$ 5.66	3%

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
REBUTTAL TESTIMONY ON
FAMILY ELECTRIC RATE ASSISTANCE PROGRAM

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
REBUTTAL TESTIMONY ON
FAMILY ELECTRIC RATE ASSISTANCE PROGRAM

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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 3
REBUTTAL TESTIMONY ON
FAMILY ELECTRIC RATE ASSISTANCE PROGRAM

A. Introduction [Witness: Jenny Wu]

This rebuttal testimony responds to the direct testimony of The Utility Reform Network (TURN) regarding Pacific Gas and Electric Company's (PG&E) Prepared Direct Testimony, and Supplemental Testimony I and II.¹

This chapter presents PG&E's rebuttal to Family Electric Rate Assistance (FERA)-specific issues, namely, the issue of FERA enrollment goals. PG&E summarizes PG&E and TURN's position in Section B and details in succeeding sections.

For FERA issues that overlap with California Alternate Rates for Energy (CARE) issues, PG&E includes its rebuttal in Chapter 2, CARE. In Chapter 2, PG&E discusses the following CARE/FERA issues: (1) program budget presentation;² (2) funding for a contract that supports Post-Enrollment Verification (PEV) process for customers;³ and (3) capitation fee increases to improve program enrollment through Community-Based Organizations (CBO).⁴

B. Summary of Party Positions

Only TURN commented on PG&E's proposed FERA enrollment goal. TURN recommends increasing PG&E's FERA enrollment goals to be at least 50 percent by 2033.⁵ In addition, PG&E identifies analytical errors in TURN's direct testimony.

¹ All references to PG&E exhibits are to the testimony served on January 9, 2026, and as updated in PG&E's June 30, 2026 errata (PG&E-01E), as well as Supplemental Testimony (PG&E-02) served on July 10, 2026 and Supplemental Testimony II (PG&E-03) served on August 10, 2026.

² See Chapter 2, Section G.

³ See Chapter 2, Section H.

⁴ See Chapter 2, Section I.

⁵ TURN-02, p. 30, lines 16-23.

1. Uncontested Issues

No party offered testimony related to:

- PG&E's proposed FERA budget escalation rates;⁶
- Maintaining FERA income eligibility guidelines adopted in Decision (D.) 21-06-015;⁷
- Maintaining FERA enrollment and recertification processes adopted in D.21-06-015;⁸ and
- Continuing funding for CBO Grant Program.⁹

C. FERA Enrollment Goals

1. PG&E Position

PG&E proposes FERA enrollment goals that begin at 30 percent in 2028 and increase by one percentage point annually, reaching 35 percent by 2033.¹⁰ PG&E's proposal is based on the achievable enrollment framework developed in the FERA Barriers Study.¹¹ PG&E acknowledges that its proposed goals are lower than the California Public Utilities Commission (CPUC or Commission)-adopted goals for the current program cycle.¹² However, PG&E maintains that the proposed enrollment goals represent more realistic expectations because they consider historical enrollment performance, the characteristics of the FERA-eligible population, and the ongoing challenges of identifying and enrolling eligible households as discussed in the FERA Barriers Study.¹³

⁶ Exhibit (PG&E-01E), p. 3-47, lines 9-13.

⁷ Exhibit (PG&E-01E), p. 3-10, line 14 to p. 3-11, line 16.

⁸ Exhibit (PG&E-01E), p. 3-21, line 16 to p. 3-24, line 12.

⁹ Exhibit (PG&E-01E), p. 3-41, line 22 to p. 3-43, line 2.

¹⁰ Exhibit (PG&E-01E), p. 3-17, lines 19-20.

¹¹ Exhibit (PG&E-01E), p. 3-17, lines 27-29. Also, Evergreen Economics and Resource Innovations, FERA Barriers Study – An Assessment of Achievable Enrollment and Program Efforts, Final Report (Aug. 22, 2025) ("FERA Barriers Study"), available at: <https://pda.energydataweb.com/#!/documents/4156/view> (accessed Oct. 8, 2026).

¹² Exhibit (PG&E-01E), p. 3-11, lines 23-25.

¹³ Exhibit (PG&E-01E), p. 3-17, line 27 to p. 3-18, line 17.

2. TURN

TURN recommends that the Commission adopt FERA goals of at least 50 percent by 2033 for PG&E.¹⁴ Specifically, TURN points to three recent developments as support for more ambitious enrollment goals than PG&E's proposal assumes:

- a) Senate Bill (SB) 1130 expanded FERA eligibility to include 1-2 person households, substantially increasing the number of eligible customers.¹⁵

TURN states that enrollment among these newly eligible households is "still far under-enrolled" (about 9 percent),¹⁶ suggesting significant untapped potential as awareness of the program increases.¹⁷ TURN also states that the newly eligible customer segment may exhibit different levels of interest, awareness, and follow-through in the enrollment process than larger households,¹⁸ but concedes that "[i]t is not yet clear whether the IOUs will observe different enrollment trends among 1-2 person households compared with households with 3+ members."¹⁹

- b) The new Base Service Charge (BSC) provides an additional discount of \$12 per month for FERA customers.²⁰ When combined with utility outreach efforts regarding the BSC, TURN assumes the FERA program, in combination with the BSC discount, would be more attractive and encourage participation.²¹

- c) PG&E proposes a Marketing, Education, and Outreach (ME&O) budget of approximately \$19.1 million and strategies for the 2028-2033 program cycle.²² TURN notes that PG&E's proposed 2028 ME&O budget of approximately \$3 million is 48 percent higher than recorded spending in

¹⁴ TURN-02, p. 30, lines 22-23.

¹⁵ TURN-02, p. 28, line 9 to p. 29, line 8.

¹⁶ TURN-02, p. 29, lines 5-6.

¹⁷ TURN-02, p. 29, lines 4-8.

¹⁸ TURN-02, p. 29, lines 9-10.

¹⁹ TURN-02, p. 29, lines 13-14.

²⁰ TURN-02, p. 29, lines 15-18.

²¹ TURN-02, p. 29, line 21 to p. 30, line 2.

²² Exhibit (PG&E-01E), p. 3-28, line 4 to p. 3-29, line 3 and Table 3-10.

2025²³ and yields an outreach cost of \$936 per new customer.²⁴

TURN concludes that it is “reasonable to expect that the efforts underlying these high costs will drive enrollment faster than in recent years.”²⁵

Given the expansion of eligibility, additional discounts, and higher outreach investments, TURN concludes that PG&E’s goals are overly conservative. TURN therefore recommends that the Commission adopt FERA enrollment goals of at least 50 percent by 2033 for PG&E.²⁶

3. PG&E Response

TURN’s three stated drivers for higher enrollment rates—SB 1130 FERA expansion, the BSC discount, and increased ME&O spending—were each examined in the FERA Barriers Study. The FERA Barriers Study determined these three factors to be either already embedded in the achievable enrollment estimate or outside PG&E’s control. Furthermore, TURN’s recommendations are not supported by PG&E’s program data which shows SB 1130, BSC, and outreach spending have had a limited impact on FERA enrollment rates as explained further below.

a. SB 1130 FERA Eligibility Expansion

TURN argues that newly eligible one- and two-person households may represent an opportunity for enrollment growth beyond PG&E’s forecast. However, this argument incorrectly equates growth in the number of eligible customers with growth in the enrollment rate. In support of higher enrollment goals, TURN points to the current enrollment rate gap between newly eligible one- and two-person households (9 percent) and households with three or more members (27 percent) as evidence for an increase.²⁷

²³ TURN-02, p. 30, lines 7-9.

²⁴ TURN-02, p. 30, lines 12-14.

²⁵ TURN-02, p. 30, lines 14-15.

²⁶ TURN-02, p. 30, lines 22-23; TURN’s response to PG&E Data Request PGE_TURN_002-Q2, dated 9/24/26 in Attachment A, at the end of this chapter.

²⁷ TURN-02, p. 29, lines 4-7.

As discussed in PG&E's Prepared Direct Testimony and Supplemental Testimony I, PG&E's proposed enrollment goals already considered the impacts of SB 1130.²⁸ The FERA Barriers Study concluded that despite extensive outreach and streamlined enrollment processes, structural and programmatic barriers continue to limit participation, and even with expanded eligibility under SB 1130, achievable enrollment will remain below current Commission goals.²⁹ Accordingly, PG&E's proposed enrollment goals reflect both the near-term enrollment ramp-up associated with the expanded eligibility and the expectation that newly eligible households will ultimately participate at rates comparable to those of the existing FERA-eligible population.³⁰

Current program data supports these assumptions. Tables 3-1A, B, and C below summarize PG&E's program enrollment data by household sizes before and after the implementation of SB 1130. The data shows that enrollment among newly eligible one- and two-person households has grown more rapidly than enrollment among larger households since SB 1130 took effect on January 2025. For example, enrollment within the one- and two-person household segment nearly doubled, increasing from 7,547 at the end of 2025 to 14,461 as of August 2026.³¹

However, the data also shows that the observed growth among newly eligible households has had a limited impact on overall program enrollment rates. Although the enrollment rate among eligible one- and two-person households increased from approximately 5 percent at the end of 2025 to approximately 9 percent as of August 2026, the overall FERA enrollment rate increased by only two percentage points, from 16

²⁸ Exhibit (PG&E-01E), p. 3-18, lines 1-10 and Exhibit PG&E-02, p. 8, line 4 to p. 10, line 24.

²⁹ Exhibit (PG&E-01E), p. 3-17, lines 20-24.

³⁰ Exhibit (PG&E-02), p. 9, line 6 to p. 10, line 4.

³¹ IQP 2025 Annual Report, FERA Table 2, available at: https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2026/05/2025_ESA_CARE_FERA_AR_Tables.xlsx (accessed Oct. 13, 2026) and IQP August 2026 Monthly Report, FERA Table 2, available at: https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2026/09/ESA_CARE_FERA_Tables_August_2026-PGE.xlsx (accessed Oct. 13, 2026).

1 percent to 18 percent, and remains well below the Commission's 70
 2 percent enrollment goal for 2026. PG&E expects enrollment growth
 3 among the newly eligible population to taper off as its participation rate
 4 approaches that of larger households.

TABLE 3-1A
FERA ENROLLMENT DATA BY HOUSEHOLD (HH) SIZE (2024)

Line No.	2024 ^(a)	Eligible	Enrolled	% Enrolled (Enrolled/ Eligible)
1	Total HH	156,547	39,262	25%
2	1-2 HH	N/A	N/A	N/A
3	3+ HH	156,547	39,262	25%

(a) Data from PG&E's 2024 IQP Annual Report, FERA Table 2. Prior to SB 1130, 1-2 HH were ineligible for FERA.

TABLE 3-1B
FERA ENROLLMENT DATA BY HOUSEHOLD (HH) SIZE (2025)

Line No.	2025 ^(a)	Eligible	Enrolled	% Enrolled (Enrolled/Eligible)
1	Total HH	315,626	49,207	16%
2	1-2 HH	156,272	7,547	5%
3	3+ HH	159,354	41,660	26%

(a) Data from PG&E's 2025 IQP Annual Report, FERA Table 2 and December 2025 IQP Monthly Report, Section 3, p.20. Prior to SB 1130, 1-2 HH were ineligible for FERA.

TABLE 3-1C
FERA ENROLLMENT DATA BY HOUSEHOLD (HH) SIZE (JAN – AUG 2026)

Line No.	2026 (Jan –Aug) ^(a)	Eligible	Enrolled	% Enrolled (Enrolled/Eligible)
1	Total HH	314,839	57,929	18%
2	1-2 HH	155,883	14,461	9%
3	3+ HH	158,956	43,468	27%

(a) Data from PG&E's August 2026 IQP Monthly Report, FERA Table 2 and Section 3, p.19.

To achieve the 50 percent enrollment goal proposed by TURN, PG&E would need to enroll approximately 73 percent of the newly eligible population based on current eligibility estimates.³² This outcome is unlikely and is unsupported by data because neither the FERA Barriers Study³³ nor TURN offer support³⁴ that newly eligible households are more likely to enroll in FERA than historically eligible households to meet a 50 percent FERA enrollment goal.³⁵ PG&E previously reported that approximately 39 percent of the 20,537 gross new enrollments in 2025 (roughly 8,000 customers) were from the newly eligible population.³⁶ Even this increase of enrollment only amounted to a 3 percent impact on overall enrollment.³⁷

b. Base Services Charges (BSC) Discount

TURN suggests that the introduction of the BSC discount provides a “higher effective discount, paired with a new marketing angle,” that could increase FERA enrollment and support a higher enrollment goal for PG&E.³⁸

PG&E’s BSC became effective in March 2026. PG&E included discount messaging for BSC in a broad reaching multi-channel outreach campaign and the majority of this campaign concluded at the end of June 2026. As a result, the most significant impacts of BSC awareness marketing and impacts on FERA enrollment have already been reflected in the current enrollment status. See Table 3-2.

³² Calculation from Table 3-1C above. Total Eligible: 314,839 50 percent Enrollment Goal: $314,839 * 0.5 = 157,420$ Subtract Current 3+ HH Enrollments to determine Goal 1-2 HH Enrollments: $157,420 - 43,468 = 113,952$ Divide Goal 1-2 HH Enrollments by 1-2 HH Eligibility: $113,952 / 155,883 = 73\%$.

³³ FERA Barriers Study, p. 35.

³⁴ PG&E propounded discovery to TURN on September 17, 2026, TURN’s response on September 24, 2026, provided no additional support to its intervenor testimony. See Attachment A to this Chapter.

³⁵ TURN-02, p. 29, lines 13-14.

³⁶ Joint IOUs Program Highlights, Low Income Oversight Board Meeting (Mar. 26, 2026), p. 2, available at: <<https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2026/03/Item-8-Joint-IOU-Status-Reports.pdf>> (accessed Oct. 12, 2026).

³⁷ *Id.*, p. 7.

³⁸ TURN-02, p. 29, line 21 to p. 30, line 2.

From January through the end of August in 2026, monthly net FERA program enrollment has increased at an average of ~1,100 per month. This is calculated using available enrollment data such as what is provided in monthly FERA reporting.³⁹ While positive, this rate of enrollment increase does not support the likelihood of achieving the overly ambitious targets proposed by TURN. The overall FERA enrollment rates have continued to increase at a pace that is generally consistent with pre-BSC trends as shown in Table 3-2 below. To date, program data does not support TURN's assumption that the BSC would have a material impact on PG&E's FERA enrollment to result in the level of growth proposed by TURN.

TABLE 3-2
MONTHLY FERA ENROLLMENT RATES (2025 AND JAN AUG 2026)

Line No.	Month	2025	2026
1	January	13%	16%
2	February	13%	16%
3	March	13%	17%
4	April	13%	17%
5	May	13%	17%
6	June	13%	18%
7	July	14%	18%
8	August	14%	18%
9	September	15%	NA
10	October	15%	NA
11	November	15%	NA
12	December	16%	NA

c. Proposed Increases in ME&O Strategies and Budget

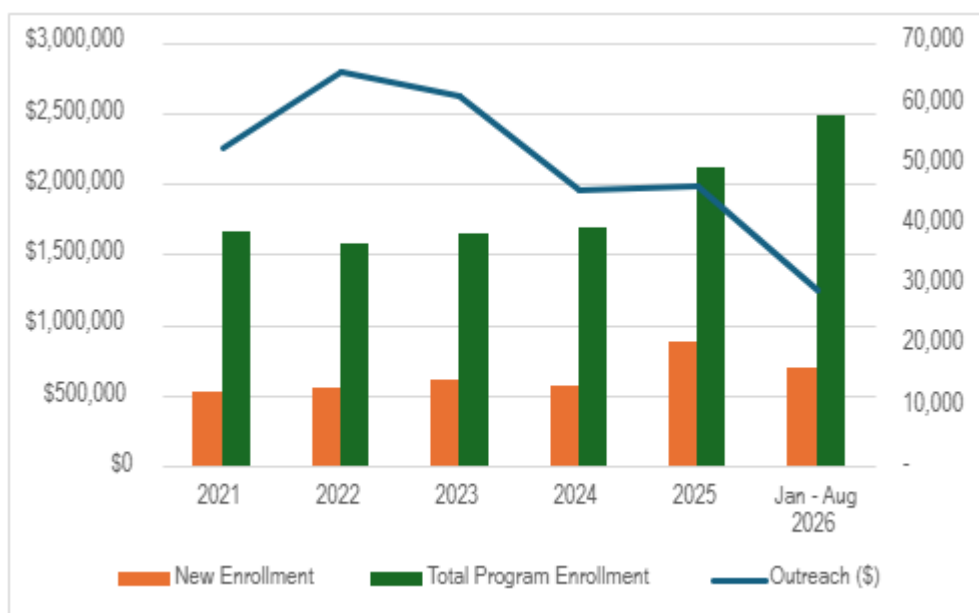
TURN asserts that PG&E's proposed increases in ME&O spending and outreach activities support higher FERA enrollment expectations. PG&E agrees that sustained ME&O investment is essential to reaching eligible customers and sustaining enrollment.

³⁹ A.19-11-003, Monthly Report of PG&E on IQP for August 2026, p. 20, Section 3.1.2, available at: https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2026/09/A.19-11-003-et-al_PGE-Monthly-Report-on-IQP-August-2026_FINAL_9.21.2026.pdf (accessed Oct. 12, 2026).

However, as discussed in PG&E's Prepared Direct Testimony, based on PG&E's program outcomes, increased spending alone does not automatically result in proportionally higher enrollment.⁴⁰

Figure 3-1 below illustrates this lack of a direct correlation between ME&O spending alone and enrollment levels.

**FIGURE 3-1
FERA ME&O EXPENDITURE AND ENROLLMENT**



Looking at ME&O outreach as the sole factor, despite higher ME&O spending levels in 2021, 2022 and 2023, enrollment outcomes for both new and total program enrollment did not outperform 2024 when the spending was reduced.⁴¹ This is because PG&E's FERA ME&O plan is a multichannel approach. Enrollment results from targeting, channel mix, and customer journey communications working together, along with eligibility rules and benefit levels outside PG&E's control, not from spending level alone. Thus, additional outreach spending as the only factor may have limited ability to overcome the structural barriers to

⁴⁰ Exhibit (PG&E-01E), p. 3-12, line 1 to p. 3-14, line 8.

⁴¹ In 2025, SB 1130 expanded FERA program eligibility which contributed to the increase in the total number of households enrolled.

1 participation identified in the FERA Barriers Study and, therefore, may
2 not automatically lead to higher enrollment levels and goals.

3 **d. Issues With TURN's Outreach Cost per New Customer Analysis**

4 PG&E identifies three analytical errors in TURN's testimony. First,
5 TURN states that by "[d]ividing each IOUs' proposed 2028 outreach
6 budget by its targeted annual increase in program enrollments (Table 8)
7 yields an outreach cost per new customer of \$936 for PG&E..."⁴²
8 TURN confuses "targeted annual increase in program enrollments,"⁴³
9 which it calculates using the data in Table 8 of its Testimony,⁴⁴ with the
10 number of new customers acquired. PG&E's enrollment forecasts
11 reflect the net number of customers enrolled in the FERA program at
12 year-end, accounting for both new enrollments and customers who are
13 removed from the program during the year.⁴⁵ Because attrition is
14 reflected in the enrollment forecast, using the year-over-year change in
15 enrollment as a proxy for new customer acquisition understates the
16 actual number of new customers enrolled during the year. As a result,
17 TURN's calculation overstates the cost of new customer acquisition.⁴⁶
18 Secondly, in that same analysis TURN erroneously assumes that
19 PG&E's outreach budget is entirely allocated to new customer
20 acquisition. However, as PG&E explains in its Prepared Direct
21 Testimony that "[t]his budget category includes costs for acquisition and
22 retention marketing and community engagement strategies."⁴⁷ By
23 attributing the entire outreach budget to new customer acquisition,

⁴² TURN-02, p. 30, lines 12-14.

⁴³ TURN-02, p. 30, lines 12-15.

⁴⁴ TURN-02, p. 28, Table 8.

⁴⁵ Workpapers, *IQP_2028-2033_WP_PGE_20260109-Ch03-FERA_EnrollmentForecast*.

⁴⁶ TURN's \$936 cost per new customer figure divides PG&E's proposed FERA 2028 outreach budget (\$2.953 million) by a targeted net enrollment increase of 3,156, ignoring attrition and treating enrollments that replace departing customers as costless. As an illustrative example, adding the 10,592 customers who left FERA in 2025 to the targeted net increase means the same budget works out to approximately \$215 per enrollment. The 10,592 figure is total 2025 FERA attrition from the December 2025 monthly IQP report, FERA Table 2.

⁴⁷ Exhibit (PG&E-01E), p. 3-47, lines 18-20.

1 TURN improperly assigns costs unrelated to new customer acquisition
2 to overstate the cost of acquiring new customers.

3 Lastly, TURN's outreach cost-per-new-customer metric lacks data
4 consistency because it is calculated using inputs from two different
5 program years. Specifically, TURN uses PG&E's 2028 outreach budget
6 as the numerator but divides it by the projected net enrollments for 2029
7 rather than 2028.⁴⁸ This mismatch distorts the calculated cost per net
8 new enrollment, undermining the reliability, in addition to validity, of
9 TURN's analysis.

10 **D. Conclusion**

11 For the reasons discussed above, PG&E recommends that the Commission
12 approve PG&E's proposed FERA enrollment goals which begin at 30 percent in
13 2028 and increase by one percentage point annually to reach 35 percent by
14 2033, as these goals already exceed the maximum achievable enrollment levels
15 based on current program requirements and processes, and account for the
16 impacts of the recent eligibility expansion and BSC. PG&E recommends the
17 Commission rejects TURN's proposed 50 percent enrollment goal because it is
18 not supported by program data or analysis.

⁴⁸ TURN-02, p. 30, lines 12-14 and p. 28, Table 8.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 3

ATTACHMENT A

FERA PROGRAM

PACIFIC GAS AND ELECTRIC COMPANY
2028-2033 Income Qualified Programs
Application 26-01-003
Data Request

To:	The Utility Reform Network (TURN)
Recipient Name:	Jennifer Kellay Sylvie Ashford Julia De Lamare Hayley Goodson Reina Yanagiba
Request Date:	September 17, 2026
PG&E Data Request No:	PGE_TURN002
PG&E File Name:	IQPPY28-33_DR_TURN_002
Response Date:	September 24, 2026

Please acknowledge receipt of this discovery request via email. PG&E further requests that TURN provide responses on an expedited schedule on or before September 24, 2026, or otherwise as soon as possible.

Please provide an electronic response to this Discovery Request to the following recipients:

- Amanda.Sweetman@pge.com;
- Jennifer.ReyesLagunero@pge.com;
- Mary.Kenaston@pge.com;
- Katherine.Foley@pge.com.

Hard copy responses are unnecessary. The responses should be sent as e-mail attachments to the recipients above. If the files are too large to e-mail, please notify the recipients above and contact Katherine Foley (Katherine.Foley@pge.com) to upload the documents into a folder on the Electronic Secure File Transfer (ESFT).

When available, provide documents in their original electronic format and leaving all formulas intact. Each page of the responses should be numbered, referenced, and indexed so worksheets can be followed. If any of your responses references or reflects calculations, provide a copy of the electronic files, including Excel spreadsheets or computer programs, that were used to derive such calculations in order to enable PG&E to review the underlying formulas and data sources.

SUBJECT: TURN OPENING TESTIMONY

Q 1: Regarding the testimony of the The Utility Reform Network (TURN), submitted September 14, 2026 in the above-referenced proceeding:

On page 34 of TURN's ESA testimony, TURN recommends:

In cases where electrification is projected to result in bill savings or no change in bills for a customer as compared to the fossil-fueled alternative, ratepayer funds must be used to support electrification so long as electrification is technically feasible. In no case should the installation of fossil-fueled equipment be allowed if technically feasible electrification is projected to cost the same or less than the fossil-fueled equipment.¹

Please clarify what TURN is referring to when it states “projected to cost the same or less than the fossil-fuel equipment.” Is TURN referring to the post-installation customer utility bills? If not, please explain.

Q01 Response:

Yes, TURN it is referring to post-installation customer utility bills. It is TURN's understanding that the methodology and inputs into the IOU's bill impact analyses are not yet defined. Notwithstanding and subject to this limitation, a customer-level bill impact analysis should provide a comparison of post-installation customer-specific bills for all fuels for the proposed electrification project and the proposed project involving a fossil-fueled alternative.

¹ TURN-01, Prepared Testimony of Jennifer Kallay on the ESA Programs, p. 34, September 14, 2026.

Q 2: On page 30 of TURN's testimony, TURN recommends that the Commission "adopt goals for PG&E and SCE of at least 50% FERA enrollment by 2033."² Please provide the basis for TURN's recommendation of a 50% FERA enrollment goal, including:

- a. Identify and provide all analyses, calculations, assumptions, studies, data, or other evidence TURN relied upon to determine that a 50% enrollment goal is achievable for PG&E by 2033.
- b. Explain how TURN derived the specific 50% figure, including whether TURN performed any quantitative analysis or forecast of PG&E's FERA enrollment through 2033. If so, provide the analysis and all supporting workpapers.

Q02 Response:

- a. TURN proposes an enrollment goal of 50% for PG&E by 2033 based on the analysis presented on pages 28-30 of TURN's testimony (Ex. TURN-02). TURN identified three factors that support an enrollment goal higher than PG&E proposes. First, SB 1130 expanded FERA eligibility to 1-2 person households; PG&E reports that only 9% of eligible 1-2 person households are enrolled compared to 27% of households with 3 or more members.³ Second, PG&E implemented the Base Services Charge in March 2026, which includes a 50% (\$12/month) discount for FERA customers, increasing the incentive for customers to enroll in the FERA program. Third, PG&E proposes new ME&O activities and requests a higher FERA outreach budget than its recent recorded spending. Taken together, it is reasonable to expect that these factors should drive higher enrollment than PG&E forecasts.
- b. TURN proposes an enrollment goal of 50% by 2033 as a reasonable midpoint between PG&E's goal of 35% proposed in testimony and SDG&E's proposed goal of 70%. This target reflects that PG&E's proposal is conservative, as discussed in response to part (a), while also recognizing that PG&E is starting from a lower level of enrollment than SDG&E.

² TURN-02, Prepared Testimony of Sylvie Ashford Addressing CARE and FERA, p. 30, September 14, 2026.

³ PG&E Response to TURN DR 9, Q9.

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
REBUTTAL TESTIMONY ON
ENERGY SAVINGS ASSISTANCE PROGRAM

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
REBUTTAL TESTIMONY ON
ENERGY SAVINGS ASSISTANCE PROGRAM

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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 4
REBUTTAL TESTIMONY ON
ENERGY SAVINGS ASSISTANCE PROGRAM

A. Introduction [Witness: Jackson Pilutti]

This rebuttal testimony responds to the direct testimony of the Public Advocates Office (Cal Advocates), The Utility Reform Network (TURN), Sierra Club and the Energy Efficiency Council (EEC), regarding Pacific Gas and Electric Company's (PG&E) Prepared Direct Testimony,¹ and Supplemental Testimony I² and II.³

Party positions are summarized in Section B, while detailed party positions and PG&E's rebuttal are provided in the succeeding sections. Intervenor testimony raises issues regarding PG&E's proposed Energy Savings Assistance (ESA) Program, including the scope and implementation of electrification measures, ESA budgets and fund-shifting rules, program design and delivery, marketing and outreach, reporting requirements, contracting and payment practices, workforce education and training, and measure eligibility. Intervenors offer differing recommendations about electrification offerings, management of ESA funds and whether additional program requirements and administrative processes should be imposed. PG&E addresses these differing recommendations below.

B. Summary of Party Positions

1. Summary of Party Positions

Cal Advocates, TURN, Sierra Club, and EEC submitted intervenor testimony regarding the following:

¹ Exhibit (PG&E-01E), (Jun. 30, 2026).
² Exhibit (PG&E-02), (July 10, 2026).
³ Exhibit (PG&E-03), (Aug. 10, 2026).

a. Cal Advocates

- Recommends rejecting PG&E’s proposed electrification funding and imposing additional requirements related to post-electrification bill impacts.⁴
- Recommends modifications to PG&E’s proposed budgets, fund-shifting rules, program delivery, and contracting practices.⁵

b. TURN

- Supports ESA electrification and fuel switching, while recommending changes related to electrification studies, goals, bill impacts, cost allocation, and energy-savings treatment.⁶
- Recommends modifications to fund-management rules and additional ESA reporting requirements.⁷

c. Sierra Club

- Recommends prioritizing and accelerating low-income electrification, including a faster transition to heat pumps.⁸
- Recommends expanding certain ESA measure offerings, including heat-pump replacements and access to air purifiers.⁹

d. Energy Efficiency Council (EEC)

- Recommends greater fund shifting flexibility and modifications to contractor support through changes to fund management, marketing and outreach, cost adjustments, payment terms, and workforce education and training.¹⁰

2. Uncontested Issues

No party offered testimony related to PG&E’s following proposals:

⁴ CA-01, p. 2-19, lines 3-6 and p. 2-12, lines 10-14.

⁵ CA-01, p. 2-3, lines 6-7; p. 2-4, line 18 to p. 2-7, Table 2-1; p. 3-4, lines 3-8; p. 3-12 lines 17-20.

⁶ TURN-01, pp. 4-8, Table 1.

⁷ *Id.*

⁸ SC-01, p. 2, lines 5-13; p. 3, lines 11-16.

⁹ SC-01, p. 2, lines 14-21 and lines 24-26; p. 3, lines 11-21.

¹⁰ EEC Testimony, p. 4, line 44 to p. 5, line 61.

- 1 • The proposed ESA Cost Effectiveness Test (ESACET) Target.¹¹
- 2 • Set portfolio-level energy savings goals for the program cycle with
- 3 annual energy savings forecasts as targets, and set households treated
- 4 forecasts as targets.¹²
- 5 • Substantially maintain the current design and delivery process of ESA
- 6 Main and Multifamily Whole Building (MFWB).¹³
- 7 • Allow in-unit copays for certain MFWB in-unit measures.¹⁴
- 8 • ESA MFWB Single Point of Contact (SPOC).¹⁵
- 9 • Retire the Multifamily Central Portal (MCP).¹⁶
- 10 • Remove normalized energy savings analysis as a requirement for
- 11 MFWB.¹⁷
- 12 • ESA Main & MFWB In-Unit Customer Segmentation Proposals.¹⁸
- 13 • Sunset Medical Baseline (MBL), High Wildfire Threat, and High Energy
- 14 Use need states.¹⁹
- 15 • The ESA measure mix, with the exception of all electrification measures
- 16 and the air purifier measure.²⁰
- 17 • ESA Program Marketing & Outreach Proposals
- 18 – Continue data-driven targeting and customer segmentation
- 19 strategies, and continue multi-channel and multi-campaign outreach
- 20 strategies.²¹

¹¹ Exhibit (PG&E-01E), p. 4-29, line 6 to p. 4-31, line 11.

¹² Exhibit (PG&E-01E), p. 4-15, lines 14-23; p. 4-22, lines 4-6 and Table 4-11; p. 4-23, Table 4-12.

¹³ Exhibit (PG&E-01E), p. 4-36, lines 3-11.

¹⁴ Exhibit (PG&E-01E), p. 4-80, lines 5-11.

¹⁵ Exhibit (PG&E-01E), p. 4-62, line 1 to p. 4-64, line 11.

¹⁶ Exhibit (PG&E-01E), p. 4-64, lines 4-8.

¹⁷ Exhibit (PG&E-01-E), p. AppB-1, line 4.

¹⁸ Exhibit (PG&E-01E), pp. 4-67, line 1 to p. 4-69, line 6.

¹⁹ Exhibit (PG&E-01E), p.4-70, line 3 to p. 4-73, Table 4-26.

²⁰ See Sections C, D, and K below for PG&E's response to measure-specific recommendations.

²¹ Exhibit (PG&E-01E), pp. 4-85, line 19 to p. 4-86, line 4.

- 1 – Community Electrification Outreach through Community Based
- 2 Organization.²²
- 3 – ESA Program Tribal Outreach Activities.²³
- 4 • PG&E's ESA Program Workforce Development Proposals
- 5 – Maintain current training offerings.²⁴
- 6 – Propose direct contractor requirements for disadvantaged worker
- 7 recruitment and on-the-job training.²⁵
- 8 – Retire certain Workforce Education & Training (WE&T) reporting
- 9 metrics and Career and Workforce Readiness requirements.²⁶
- 10 • Propose open and competitive solicitations to procure third-party
- 11 solicitations, use in-house program design, and do not require
- 12 Independent Evaluator (IE) or Procurement Review Group (PRG)
- 13 support.²⁷
- 14 • Proposed improvements to the solicitation process and timeline.²⁸
- 15 • Proposals for coordination and leveraging.²⁹
- 16 • Proposed ESA Inspections, CPUC Energy Division, Regulatory
- 17 Compliance, Training Center, and General Administration activities.³⁰
- 18 • Modify and/or sunset a subset of ESA compliance items that have
- 19 become obsolete.³¹

²² Exhibit (PG&E-01E), p. 4-97, lines 1-25.

²³ Exhibit (PG&E-01E), p. 4-96, lines 3-30.

²⁴ Exhibit (PG&E-01E), p. 4-99, lines 27-29.

²⁵ Exhibit (PG&E-01E), p. 4-100, lines 19-28.

²⁶ Exhibit (PG&E-01E), p. AppB-1, lines 7-8.

²⁷ Exhibit (PG&E-01E), p. 4-103, line 12 to p. 4-104, line 10.

²⁸ Exhibit (PG&E-01E), p. 4-105, line 14 to p. 4-106, line 6.

²⁹ Exhibit (PG&E-01E), p. 4-117, lines 5-26.

³⁰ Exhibit (PG&E-01E), p. 4-120, line 16 to p. 4-125, line 22.

³¹ Exhibit (PG&E-01-E), p. AppB-1, Table B-1.

1 C. Electrification in ESA

2 1. PG&E's ESA Electrification Proposals

3 a. PG&E Position

4 Consistent with PG&E's broader decarbonization strategy,³² PG&E
 5 proposes to incorporate electrification into its ESA Program in a manner
 6 that advances California's climate, affordability, and energy-equity
 7 objectives while supporting a core purpose of ESA: delivering
 8 meaningful benefits to income-qualified customers. PG&E's proposed
 9 approach (1) expands income-qualified customer access to heat pump
 10 technologies, (2) supports evolving state and local decarbonization
 11 requirements and priorities, and (3) provides no-cost electrification
 12 opportunities to customers who may otherwise face barriers to adoption.

13 To achieve these objectives, PG&E proposes two primary
 14 electrification initiatives within ESA. First, PG&E proposes to modify its
 15 existing Repair and Replace (R&R) offerings to enable the replacement
 16 of failed gas water heating and space heating equipment with electric
 17 technologies, including heat pump water heaters and heat pump HVAC
 18 systems.³³ Second, PG&E proposes a new Targeted Deep Savings
 19 Tier that builds upon lessons learned from Pilot Plus and Pilot Deep and
 20 is designed to deliver substantial energy savings and electrification
 21 opportunities through targeted treatment of households that exhibit high
 22 savings potential.³⁴

23 PG&E's proposals are informed by operational experience gained
 24 through the current program cycle, including the Pilot Plus and Pilot
 25 Deep programs,³⁵ and are designed to prioritize customer affordability,
 26 program feasibility, workforce readiness, and implementation

³² Exhibit (PG&E-01E), p. 1-14, line 14 to p. 1-15, line 14.

³³ Exhibit (PG&E-01E), p. 4-37, line 13 to p. 4-49, line 8.

³⁴ Exhibit (PG&E-01E), p. 4-49, line 9 to p. 4-54, line 9.

³⁵ Exhibit (PG&E-01E), p. 4-49, line 24 to p. 4-50, line 1.

considerations.³⁶ PG&E proposes a phased deployment approach that transitions R&R offerings to electrification by the end of 2031.³⁷

Through these proposals, PG&E seeks to continue the ESA Program's longstanding role in reducing customer energy burdens while expanding access to electrification technologies that benefit customers and support California's broader decarbonization goals.

b. Party Position(s)

Sierra Club, TURN, and Cal Advocates submitted testimony regarding PG&E's ESA electrification proposals. EEC did not submit testimony regarding PG&E's ESA electrification proposals.

1) Sierra Club

Sierra Club recommends that the Commission make an express policy determination that ESA should prioritize low-income electrification as a primary program objective during the 2028-2033 cycle.³⁸ Sierra Club states that California's climate, air quality, public health, and energy equity goals require accelerated electrification of low-income households and contends that ESA should evolve from supporting fossil-fuel equipment toward facilitating widespread electrification.³⁹ Sierra Club further states that continued investment in gas-fired appliances is inconsistent with state decarbonization objectives and risks increasing long-term energy burdens for low-income customers.⁴⁰

Sierra Club states that Investor Owned Utilities (IOU) should be required to provide mostly heat pump measures beginning in 2028.⁴¹ Specifically, Sierra Club recommends that PG&E accelerate its proposed electrification rollout and transition ESA Main and MFWB furnace and water-heater repair and replacement

³⁶ Exhibit (PG&E-01E), p. 4-37, line 13 to p. 4-54, line 9.

³⁷ Exhibit (PG&E-01E), p. 4-44, Table 4-19.

³⁸ SC-01, p. 38, line 5 to p. 39, line 18.

³⁹ SC-01, p. 8, line 1 to p. 38, line 4.

⁴⁰ *Id.*

⁴¹ SC-01, p. 40, lines 4-8.

services to electrification measures throughout PG&E's service territory beginning in 2028.⁴² Sierra Club further recommends limiting any continued installation of gas equipment to circumstances where electric replacements are infeasible.⁴³

2) TURN

TURN also expresses support for incorporating electrification measures into ESA program offerings. TURN details California's aggressive policy and statutory goals to limit greenhouse gas emissions and decarbonize the economy, including California's statutory policy to achieve net zero GHG emissions by 2045, AB 32, and CARB's *2022 Scoping Plan for Achieving Carbon Neutrality*, as well as the Commission's 2024 decision which phased out incentives for non-exempt, non-cost-effective residential gas energy efficiency measures that would materially increase gas usage.⁴⁴

Given this, TURN recommends low-income customers be included in the statewide energy transition away from natural gas appliances, and that ESA is an avenue to enable this transition.⁴⁵

3) Cal Advocates

Cal Advocates requests that the Commission reject all electrification measures being offered through PG&E's ESA program, specified by Cal Advocates as the \$97 million identified as ESA electrification initiatives, including all fuel substitution measures.⁴⁶ Cal Advocates asserts that these proposals constitute a significant increase in measure expenses through ESA,⁴⁷ constitute the majority of a "\$25 million increase" during the program

⁴² SC-01, p. 66, lines 7-9.

⁴³ SC-01, p. 94, lines 11-13.

⁴⁴ TURN-01, p. 18, lines 7-19.

⁴⁵ TURN-01, p. 19, lines 7-16.

⁴⁶ CA-01, p. 2-19, lines 3-9.

⁴⁷ CA-01, p. 2-15, line 8 to p. 2-18, line 9.

cycle,⁴⁸ “weigh down” the budget,⁴⁹ and are primarily predicated on Bay Area Air District (BAAD) gas appliance rules.⁵⁰

Cal Advocates states that PG&E’s proposed \$97 million electrification budget constitutes a significant portion of the ESA Main and MFWB measures budgets and is the principal driver of their growth over the 2028-2033 cycle. Cal Advocates notes that annual electrification funding would increase from \$2.8 million in 2028 to \$23.2 million in 2032, claiming that this accounts for most of the \$25 million “increase” in PG&E’s overall measures budgets during that period. Cal Advocates further asserts that electrification would grow from less than two percent of PG&E’s proposed annual budget in 2028 to more than 13 percent in 2032 and 2033, while spending on the remaining measures would remain relatively flat or decline.

Cal Advocates recommends rejecting all of PG&E’s proposed funding related to fuel substitution measures because it views the funding as predicated on the BAAD’s zero-NOx appliance requirements, while BAAD may exempt qualifying low-income property owners from those requirements.

c. **PG&E Response**

Sierra Club

- **PG&E Agrees with Sierra Club’s Statements on the Importance of Income-Qualified Customers and California’s Goals on Electrification.**

PG&E appreciates Sierra Club’s discussion of California’s climate, electrification, environmental justice, and energy equity objectives. Sierra Club contends that low-income customers must be included in California’s clean-energy transition and that programs

⁴⁸ CA-01, p. 2-16, lines 4-10.

⁴⁹ CA-01, p. 2-19, lines 1-2.

⁵⁰ CA-01, p. 2-19, line 3 to p. 2-21, line 2.

1 serving these households should support broader statewide
2 decarbonization goals.⁵¹

3 PG&E concurs with Sierra Club's central observation that
4 income-qualified households should have access to electrification
5 opportunities if California is to achieve its long-term climate, air
6 quality, and equity goals. PG&E likewise agrees that electrification
7 can provide significant benefits for eligible customers, including
8 access to newer technologies, reduced greenhouse gas emissions,
9 and alignment with broader State policy objectives. These
10 considerations are a principal reason why PG&E proposes to
11 transition the ESA portfolio toward all-electric appliance installations
12 during the 2028-2033 cycle.

13 As such, PG&E supports Sierra Club's conclusions on the
14 importance of electrification through ESA and Sierra Club's
15 recommendation that the Commission makes an express
16 determination that ESA prioritizes low income electrification.

17 • **The Conversion of ESA Appliance Replacement to**
18 **Electrification will Benefit from an Incremental Transition**

19 PG&E disagrees with Sierra Club's recommendations that all
20 appliance replacement services be converted to electrification
21 immediately beginning in 2028, which includes limiting continued
22 installation of gas appliances to circumstances where electric
23 replacements are infeasible. While PG&E shares Sierra Club's
24 ultimate objective, Sierra Club's proposals do not adequately
25 account for the operational, workforce, and implementation
26 requirements associated with transitioning ESA from a portfolio that
27 historically conducted like-for-like replacement technologies.

28 Sierra Club asserts that PG&E has not demonstrated that such
29 a ramp-up period is necessary, citing PG&E's 2027 proposals
30 associated with compliance with BAAD heat pump water heater
31 requirements and previous electrification activities. However, PG&E
32 disagrees with Sierra Club's assertion because the comparison

⁵¹ SC-01, p. 8, line 1 to p. 30, line 9.

1 does not reflect the magnitude of the electrification transition
2 proposed through ESA. For example, PG&E forecasted installation
3 of approximately 300 replacement water heaters annually within the
4 Bay Area when complying with BAAD rules.⁵² Similarly, annual
5 electrification efforts through Pilot Plus/Pilot Deep (PP/PD) have yet
6 to exceed approximately 200 fuel substitution measures.⁵³ By
7 contrast, once PG&E's proposed transition is fully implemented,
8 PG&E forecasts more than 1,500 annual electrification replacement
9 projects through ESA, an order of magnitude greater than the levels
10 previously tested through ESA implementation.⁵⁴ Therefore, it is
11 not reasonable to conclude that based on prior experience alone,
12 that PG&E can immediately scale ESA to full-service-territory
13 electrification beginning in 2028.

14 PG&E's proposal reflects a deliberate and manageable
15 transition strategy designed to preserve customer service quality
16 while building the infrastructure necessary to support significantly
17 higher levels of electrification activity across PG&E's service
18 territory. The proposed phased approach allows ESA contractors to
19 expand workforce capacity, establish new operational processes,
20 and refine implementation practices before electrification volumes
21 increase substantially. The approach also provides time for PG&E
22 to scale supporting internal functions including service planning,
23 electrical infrastructure assessments, permitting coordination, and
24 contractor oversight necessary to support widespread deployment of
25 electrification measures through ESA.

26 A phased transition balances the Commission's objectives of
27 advancing electrification at scale while supporting program quality,
28 customer experience, and implementation effectiveness.

29 Nevertheless, should the Commission determine that
30 electrification should occur more rapidly than proposed by PG&E,

⁵² A.25-06-024, Exhibit (PG&E-01E), p. 42, line 8.

⁵³ Year-to-date count of fuel substitution measures as of August 2026, as noted in A.19-11-003, Monthly Report of PG&E on IQP for August 2026, p. 30, ESA Table 2B.

⁵⁴ Exhibit (PG&E-01E), p. AppA-6, Table A-1.

PG&E requests that the Commission authorize a phased transition period rather than require immediate full deployment beginning in 2028. PG&E recommends that the Commission provide a ramp-up period extending at minimum through calendar year 2029.

Finally, if the Commission adopts an accelerated electrification schedule that differs materially from PG&E's proposal, PG&E requests authorization to revise its associated program forecasts, including energy savings goals and targets through the appropriate regulatory vehicle. These forecasts were developed based on PG&E's proposed implementation schedule and assumptions. Modification of the electrification timeline would necessarily affect the underlying assumptions and the portfolio's forecasted goal attainment.

Cal Advocates

- **PG&E's Electrification Budget is not a New \$97 million Expense.** Cal Advocates characterizes the entire \$97 million electrification budget as an increase in ESA spending.⁵⁵ That characterization is incorrect. The majority of PG&E's proposed electrification budget represents a transition from existing gas repair and replacement activities to electric heat pump technologies, rather than an entirely new category of program spending. Cal Advocates' analysis does not account for the natural gas appliance expenditures that the proposed electric measures would replace.

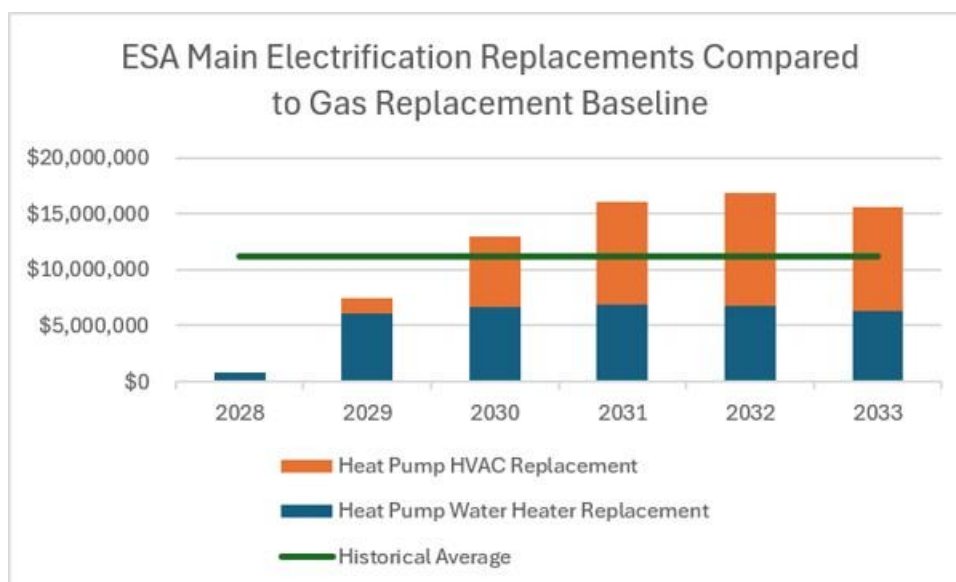
For example, once ESA Main replacement services have transitioned to electrification, PG&E forecasts average annual expenditures of approximately \$16.2 million for heat pump repair and replacement activities.⁵⁶ This is not a wholly new program cost. Instead, it should be evaluated in comparison with historical spending on the natural gas repair and replacement measures that heat pump technologies would replace. From 2023 through 2025, ESA spent an average of approximately \$11.6 million annually on

⁵⁵ CA-01, p. 2-15, lines 12-15.

⁵⁶ Exhibit (PG&E-01E), p. AppA-6, Table A-1.

natural gas repair and replacement activities.⁵⁷ This comparison between ESA Main historical gas replacement costs and forecasted electric replacement costs is demonstrated in Figure 4-1, below. Thus, the majority of the forecasted heat pump replacement budget reflects a transfer of funding from one measure category to another, rather than the incremental \$97 million expense suggested by Cal Advocates.

FIGURE 4-1
PG&E'S 2028-2033 FORECAST OF ESA MAIN FUEL SUBSTITUTION APPLIANCE
REPLACEMENTS COMPARED TO HISTORICAL GAS REPLACEMENTS



Cal Advocates' own description of PG&E's proposal confirms that approximately \$70 million of the \$97 million is attributable to ESA Main fuel substitution, with another \$7.6 million associated with multifamily fuel substitution.⁵⁸ By treating the full amount as incremental spending without considering the gas appliance budgets displaced by these activities, Cal Advocates' analysis materially overstates the budgetary effect of PG&E's proposed transition.

⁵⁷ A.19-11-003, PG&E 2023 ESA Annual Report, p. 124, ESA Table 1, PG&E 2024 ESA Annual Report, p. 92, ESA Table 1, and PG&E 2025 ESA Annual Report, p. 87, ESA Table 1.

⁵⁸ CA-01, p. 2-16, Table 2-2.

1 • **Cal Advocates Conflates the Proposed Program Ramp-Up with**
 2 **an Electrification-Driven Budget Increase.**

3 Cal Advocates also mischaracterizes the difference between
 4 PG&E's 2028 and 2032 Energy Efficiency Measures budgets as a
 5 \$25 million increase driven primarily by electrification.

6 Cal Advocates reaches this conclusion by comparing PG&E's
 7 proposed \$126 million budget in 2028 with the \$151 million budget
 8 proposed for 2032 and observing that annual electrification funding
 9 increases from \$2.8 million to \$23.2 million over the same period.⁵⁹

10 This comparison is incomplete because it does not account for
 11 PG&E's proposed ramp-up of ESA Main and MFWB activities during
 12 the initial years of the program cycle.⁶⁰ The difference between
 13 2028 and 2032 is not solely a comparison between a portfolio
 14 without electrification and a portfolio with electrification. Rather,
 15 2028 reflects the first year where PG&E forecasts lower installation
 16 volume due to general ramp-up,⁶¹ while 2032 reflects a later year in
 17 which both ESA program activity and the planned transition to
 18 electrification are more fully implemented.⁶² Supporting this
 19 conclusion, Cal Advocates' testimony visualizes the increase
 20 resulting from general program ramp-up between 2028 and 2029 in
 21 Figure 2-3 of their testimony.⁶³

22 Cal Advocates further relies on the amounts presented in its
 23 Table 2-2 to treat all expenditures associated with electrification as
 24 incremental.⁶⁴ However, as discussed above, a substantial portion
 25 of those expenditures replaces funding that otherwise would support
 26 natural gas repair and replacement measures. PG&E
 27 acknowledges that Cal Advocates' Table 2-2 shows that the annual

⁵⁹ CA-01, p. 2-16, lines 4-10.

⁶⁰ See Exhibit (PG&E-01E), p. 4-122, lines 10-26; p. 4-123, line 19 to p. 4-124, line 16.

⁶¹ *Id.*

⁶² Exhibit (PG&E-01E), p. 4-44, Table 4-19.

⁶³ CA-01, p. 2-14, Figure 2-3.

⁶⁴ CA-01, p. 2-16, lines 9-10.

growth describes the timing of PG&E's proposed transition to electrification, and demonstrates how total forecasted budget for all electrification measures grows as natural gas replacements transition to electrification. On the other hand, Cal Advocates' Table 2-2 does not establish that the entire amount constitutes an increase in the overall cost of providing electrification services.

- **The Size of PG&E's Electrification Budget Does Not Demonstrate that the Proposal Is Unreasonable**

Cal Advocates states that PG&E's electrification proposals constitute a "significant part" of the proposed ESA budget and asserts that the "growing electrification budgets are weighing the next cycle of budgets down."⁶⁵ Cal Advocates notes that electrification costs increase from less than two percent of the proposed annual budget in 2028 to more than 13 percent in 2032 and 2033.⁶⁶

PG&E disagrees that the relative size of the electrification budget demonstrates that the proposal is excessive or would "weigh" the portfolio down. PG&E's electrification budget supports a suite of more than eight heat pump and other electric measure offerings.⁶⁷ In the aggregate, the proposed budget for these measures is comparable to, or less than, the budgets associated with certain individual high-volume ESA measures. As shown in Table 4-1 below, measures such as air sealing and refrigerators receive budget allocations similar to or greater than the collective budget for the entirety of PG&E's proposed electrification offerings.

⁶⁵ CA-01, p. 2-19, lines 1-2.

⁶⁶ CA-01, p. 2-18, line 14 to p. 2-19, line 1.

⁶⁷ See Exhibit (PG&E-01E), pp. AppA-6 to AppA-7, Tables A-1 and A-1a for the complete list of electrification measures.

TABLE 4-1
2030 PROPOSED ESA MAIN MEASURES AS A PERCENT OF TOTAL 2030 ESA MAIN EE
BUDGETS COMPARED TO ESACET ESTIMATES

Line No.	Measure	Measure Budget as a % of total ESA Main EE Budget	Measure-Level Estimated ESACET Forecast
1	Refrigerator	13.3%	0.4
2	Air Sealing	18.2%	0.5
3	Prescriptive Duct Sealing	12.6%	1.0
4	Heat Pump Water Heater (Fuel Substitution)	6.5%	0.7
5	Ducted Heat Pump (Fuel Substitution)	6.3%	0.5
6	Targeted Deep Savings Tier Measures		
7	Heat Pump Water Heater (Fuel Substitution)	0.9%	0.7
8	Heat Pump HVAC (Fuel Substitution)	1.2%	0.7
9	Heat Pump Clothes Dryer (Fuel Substitution)	0.1%	0.4

Note: All measure budget estimates and measure-level ESACET estimates are as forecasted in Exhibit (PG&E-01E).

The size of a measure budget, standing alone, is not a reasonable basis for determining whether the measure adversely affects the portfolio because measures with large, forecasted budgets may be cost-effective or provide substantial participant benefits. As demonstrated by the ESACET values provided in Table 4-1, above, PG&E estimates that its proposed fuel-substitution measures will provide cost-effectiveness results comparable to, or better than, the other high-budget, historically high-volume ESA measures identified in Table 4-1. PG&E developed the proposed measure mix in accordance with the Commission's portfolio ESACET guidance, with electrification serving as one component of the broader portfolio. As Cal Advocates acknowledges, PG&E has achieved ESACET scores near to or above the Commission's 0.7 guideline and proposes similar targets during the next program cycle.⁶⁸

- **PG&E's Electrification Proposal Is Not Predicated Solely on Bay Area Air District Requirements**

Cal Advocates mischaracterizes PG&E's proposed electrification budgets as predicated on the BAAD appliance requirements. One primary driver of PG&E's proposal to begin the electrification transition

⁶⁸ CA-01, p. 3-2, lines 14-18.

in the Bay Area is that the timing of the Air District's requirements aligns with PG&E's planned portfolio transition.⁶⁹ However, this is not the only driver. PG&E identifies compliance with applicable regulations as one basis for the proposal, together with broader climate, affordability, public-health, and energy-equity objectives.⁷⁰ Moreover, PG&E proposes electrification through repair and replacement services and through the Targeted Deep Savings Tier throughout its entire service territory, not restricted solely within the Bay Area.

While Cal Advocates identifies a potential exemption to the BAAD appliance requirements for certain low-income property owners, the importance of broader customer and program benefits supporting PG&E's service-territory-wide proposal, including the climate, public health, and energy justice priorities noted in both PG&E's and Sierra Club's testimony as discussed above still remains.

D. Electrification Implementation and Policies

Parties provide additional recommendations regarding electrification through ESA, including (1) revising ESA goals and budgets following the next Potential & Goals (P&G) Study, (2) offering fuel-switching through ESA, (3) modifying cost allocation for electrification measures, (4) estimating post-installation customer bills following electrification, (5) air conditioner (AC) replacements, and (6) standardizing energy savings reporting for electrification measures. The following section addresses each party's recommendation, and includes PG&E's position on the recommendation in the respective section.

1. TURN's Recommendation to Revise ESA Goals and Budgets Following the Results of the Next P&G Study is Out of Scope, Redundant, and Overly Burdensome

TURN argues that the most recent P&G Study did not adequately incorporate fuel switching and that the study's fuel-substitution assumptions contain shortcomings.⁷¹ TURN recommends improving future studies and

⁶⁹ Exhibit (PG&E-01E), p. 4-40, lines 4-12.

⁷⁰ Exhibit (PG&E-01E), p. 4-38, lines 10-12.

⁷¹ TURN-01 p. 40, lines 4-5.

1 requiring utilities to revise ESA fuel-substitution and fuel-switching budgets
2 and goals to reflect future study results.⁷²

3 PG&E addressed the P&G Study in PG&E's Prepared Direct
4 Testimony.⁷³ PG&E has no further comment, but acknowledges that this
5 proceeding is not the forum to discuss the methodology of the P&G Study.
6 For background, the P&G Study is led by the Energy Division and there is
7 an established process for stakeholder comments on the draft.⁷⁴

8 PG&E disagrees with requiring budget and goal revisions based on
9 results of the next study. First, such a requirement is outside the scope of
10 how ESA programs should consider the P&G study as the Commission has
11 previously provided guidance that the P&G study should be used to inform,
12 but not set,⁷⁵ ESA Program goals:

13 The primary purpose of the 2025 Study is to provide information that can
14 inform the budget, goal, and target setting proceedings for the ESA
15 programs. The Study results should not be interpreted as setting ESA
16 goals. While the 2025 Study provides data that can be compared to the
17 current ESA program goals, the study results are not directly
18 comparable. The study results do not include all the same boundaries
19 and limitations considered for the ESA decision goals.⁷⁶

20 Additionally, this requirement is administratively burdensome and
21 redundant because PG&E has proposed other, sufficient avenues for
22 responding to study results. These include PG&E's ability to modify ESA
23 program offerings dynamically throughout the program cycle using the
24 measure modification process and PG&E's proposed mid-cycle modification
25 process.⁷⁷

⁷² TURN-01 p. 40, lines 7-11.

⁷³ Exhibit (PG&E-01E), p. 4-17, line 15 to p. 4-20, line 2.

⁷⁴ For more information on the 2027 P&G Study and the engagement processes, see CPUC Energy Efficiency Potential and Goal Studies, available at: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/energy-efficiency-potential-and-goals-studies> (accessed Oct. 8, 2026).

⁷⁵ Decision (D.) 21-06-015, pp 219-220.

⁷⁶ 2025 Income Qualified Potential and Goals Study Final Report (July 9, 2025), p. viii, available at: <https://pda.energydataweb.com/#!/documents/4187/view> (accessed Oct. 13, 2026).

⁷⁷ Exhibit (PG&E-01E), p. 4-109, line 23 to p. 4-112, line 3.

PG&E instead requests the Commission deny TURN's proposal and allow any necessary changes to be conducted through standard modification processes such as those detailed in Chapter 5 of PG&E's Rebuttal Testimony and Chapter 4 of PG&E's Opening Testimony.⁷⁸

2. TURN's Recommendation to Offer Fuel Switching Immediately through ESA Is Reasonable

Because PG&E's electrification proposals are supported by learnings originating from both its PP/PD program and natural gas appliance replacement offerings—neither of which have historically offered fuel switching—PG&E focused on fuel *substitution* when forecasting installations in 2028-2033. PG&E is, however, authorized to install fuel-switching measures and proposed evaluating fuel-switching⁷⁹ during the 2028-2033 cycle.⁸⁰

TURN acknowledges that as PG&E is already authorized to install certain fuel-switching measures, these measures could be offered through ESA at the beginning of the 2028-2033 cycle.⁸¹ TURN states fuel switching is particularly important for customers who do not have access to utility natural gas and for customers who may benefit from transitioning from non-utility fuels to electric technologies.⁸²

PG&E appreciates TURN's testimony regarding fuel switching opportunities and agrees that fuel switching may provide benefits for certain income-qualified customers—particularly customers who do not have access to utility natural gas. PG&E also agrees that ESA is an appropriate vehicle for providing these customers with access to electrification technologies.

⁷⁸ *Id.*

⁷⁹ Fuel substitution is defined as projects where all or a portion of the measures involve converting an existing energy use from one regulated fuel to another (e.g., natural gas to electricity). Fuel switching is defined as energy efficiency projects where all or a portion of the measures involve converting an existing energy use from non-regulated fuel (e.g., propane, wood, or oil, to electricity) to another regulated fuel.

⁸⁰ Exhibit (PG&E-01E), p. 4-37, fn. 69.

⁸¹ TURN-01, p. 20, lines 21-23.

⁸² TURN-01, p. 21, lines 6-19.

Consistent with PG&E's existing authorization to install certain fuel-switching measures and TURN's objectives, PG&E is amenable to incorporating fuel-switching offerings into its proposed Targeted Deep Savings Tier and further exploring expansion of fuel-switching offerings as implementation experience develops. Accordingly, PG&E does not oppose TURN's recommendation that ESA provide fuel-switching opportunities for eligible customers during the 2028-2033 cycle.

3. Proposals Regarding Cost Allocation for Electrification Measures

TURN observes that the Commission has not established specific cost-allocation guidance for electrification activities within ESA.⁸³ TURN further notes that PG&E's proposed approach differs from the methodology used by the other IOUs and from Commission guidance applicable to energy efficiency fuel-substitution programs.⁸⁴ TURN recommends that the Commission require PG&E to allocate electrification costs entirely to electric ratepayers and establish statewide guidance governing cost allocation for both fuel substitution and fuel switching within ESA.⁸⁵

PG&E proposes a 2028-2033 gas/electric split of approximately 51 percent to electric customers and 49 percent to gas customers that is generally consistent with prior ESA portfolio cost-recovery approaches and reflects PG&E's methodology to allocate ESA costs based on costs and benefits realized by participating customers.⁸⁶ PG&E acknowledges TURN's reference to D.19-08-009, which established cost allocation guidance for fuel-substitution measures in the energy efficiency portfolio and generally allocates such costs to the ratepayers of the new fuel.⁸⁷

While PG&E finds its proposed methodology appropriate based on the costs and benefits realized by participating customers, PG&E will comply with Commission guidance regarding allocation of fuel-substitution and fuel-switching costs within ESA. However, should the Commission require a

⁸³ TURN-01, p. 20, lines 5-12.

⁸⁴ TURN-01, p. 19, lines 19-23.

⁸⁵ TURN-01, p. 20, lines 14-19.

⁸⁶ Exhibit (PG&E-01E), p. 6-13, lines 2-5.

⁸⁷ D.19-08-009, p. 59, Ordering Paragraph (OP) 5.

different allocation framework than proposed by PG&E, PG&E requests authorization to revise the portfolio's electric and gas funding allocation to reflect the Commission's determination and the associated revenue requirement impacts through the appropriate regulatory vehicle.

Accordingly, PG&E will follow the Commission's direction on this issue.

4. Post-Electrification Bill Impacts

a. TURN's Proposals are Reasonable, Provided there is Sufficient Flexibility for IOUs to Develop Bill Impact Tools Independently.

PG&E supports TURN's recommendation to evaluate customer bill impacts before offering electrification measures to a customer, although PG&E disagrees that utilities should be required to co-develop a bill impact tool. PG&E already proposes estimating post-installation bill impacts when considering an electrification measure in its Repair and Replacement program and Targeted Deep Savings Tier proposals.⁸⁸ Integrating estimated electrification bill impacts into ESA's targeting process supports the program's core objectives to reduce energy usage, lower utility bills, and improve home comfort and safety. Ideally, electrification measures achieve all three objectives. However, outcomes are largely dependent on the specifics of the home and household. With electrification bill savings being variable, PG&E plans to educate customers on potential bill increases as well as strategies to improve bill savings.⁸⁹

While PG&E supports reviewing estimated bill impacts when targeting households for electrification measures, it disagrees with TURN's proposal to the extent that it requires IOUs to develop and use a joint tool for bill impact analysis, as IOUs should deploy the tools suited to estimate bill impacts in their service territory and that consider IOU-specific attributes such as climate and geography and rate design. Co-development of a joint tool would require re-work to integrate existing IOU tools or could result in a tool that is not purposely built for the service territory that is being analyzed. Co-development of a new

⁸⁸ Exhibit (PG&E-01E), p. 4-37, line 13 to p. 4-54, line 9.

⁸⁹ Exhibit (PG&E-01E), p. 4-48, line 4 to p. 4-49, line 8; p. 4-53, line 26 to p. 4-54, line 9.

1 bill impact tool would also introduce additional complexities, additional
2 development and maintenance costs, and risk deployment delays.

3 **TURN's Proposals Regarding the Application of Bill Impact**
4 **Analysis are Reasonable, Provided there is Adequate Flexibility**
5 **and any Guidance Conforms with PG&E's Proposed Transition.**

6 PG&E supports collaboration and knowledge sharing between IOUs,
7 and is neutral on TURN's recommendation for formal guidance on the
8 application of estimated bill impacts to ESA. PG&E proposes that ESA
9 transition away from gas appliance installation incrementally,
10 transitioning entirely to electrification by the end of 2031.⁹⁰

11 TURN recommends that the Commission establish guidance
12 governing the application of estimated customer bill impacts to ESA
13 electrification decisions. TURN recommends that electrification be
14 pursued where an electric alternative is technically feasible and
15 projected to be bill-neutral or bill-reducing relative to the fossil-fueled
16 alternative.⁹¹ TURN further recommends that customers be permitted
17 to choose electrification where it is projected to increase customer bills.

18 PG&E appreciates TURN's intention to promote electrification in this
19 proposal, and is neutral regarding whether the Commission provides
20 guidance on the application of customer bill impacts within ESA. PG&E
21 agrees that customer bill impacts are an important consideration in
22 electrification decision-making and that bill analysis may help inform
23 technology selection under certain circumstances.

24 However, any Commission guidance should be implemented in a
25 manner that is consistent with PG&E's proposed transition to
26 electrification and provides sufficient implementation flexibility. PG&E
27 proposes to transition repair and replacement services from gas
28 appliances to electric technologies over the course of the 2028-2033
29 cycle, with full electrification occurring after 2031.⁹² Accordingly, any
30 bill-impact requirements should apply only where fuel-substitution

⁹⁰ Exhibit (PG&E-01E), p. 4-44, Table 4-19.

⁹¹ TURN-01, p. 34, lines 4-13.

⁹² Exhibit (PG&E-01E), p. 4-44, Table 4-19.

offerings are available and should not conflict with the proposed transition schedule.

PG&E does not oppose the Commission adopting guidance regarding the application of estimated bill-impact analysis, provided such guidance is implemented in a manner that supports flexible program administration and customer choice. Thus, PG&E also recommends that the Commission preserve flexibility to address customer-specific circumstances, including situations where projected bill impacts are subject to significant uncertainty or where a customer declines the recommended technology.

b. PG&E Supports Cal Advocates’ Intent, and Disagrees with “Guaranteeing” Bill Neutrality.

Cal Advocates argues that ESA electrification measures should not increase customer energy burdens, and recommends requiring utilities to model expected post-installation bill impacts resulting from electrification.⁹³ Cal Advocates specifically recommends a 12-month post-installation bill neutrality requirement along with targeting electrification investments toward homes where meaningful bill savings are more likely to occur.⁹⁴

PG&E agrees in part with Cal Advocates’ position. PG&E agrees with the importance of estimating post-installation bill impacts and providing customer education, and indeed proposes modeling estimated post-installation bill impacts resulting from electrification.⁹⁵ However PG&E disagrees with requiring a “guarantee” because this term is undefined, could incur significant ratepayer costs, and estimated impacts of fuel-substitution are uncertain. In fact, the Commission has agreed in other recent proceedings that post-installation bill impacts are estimates and has declined to require guarantees of bill neutrality.⁹⁶ Actual post-installation utility bills can vary based on a number of factors

⁹³ CA-01, p. 2-12, line 10 to p. 2-13, line 5.

⁹⁴ *Id.*

⁹⁵ Exhibit (PG&E-01E), p. 4-48, line 4 to p. 4-49, line 8; p. 4-53, line 26 to p. 4-54, line 9.

⁹⁶ D.26-07-030, p. 76, Findings of Fact 24.

outside of utility control including weather, occupancy, rate changes, customer behavior, and appliance usage.

Accordingly, the Commission should reject Cal Advocates' recommendation to "guarantee" bill neutrality.

PG&E remains neutral on Cal Advocates' recommendation requiring IOUs to estimate bill impacts because this is already included in PG&E's 2028-2033 proposals.⁹⁷

5. Transitioning AC Replacement to HP Replacement Is Reasonable.

Sierra Club recommends that PG&E discontinue traditional air conditioner replacement offerings and prioritize air conditioner-to-heat-pump conversions beginning in 2028 with some exceptions.⁹⁸ Sierra Club states that replacing aging cooling equipment with heat pumps would better align ESA investments with California's electrification objectives while providing customers both heating and cooling benefits.⁹⁹

PG&E is generally supportive of this suggestion and agrees with Sierra Club that exceptions may be necessary on a case-by-case basis.¹⁰⁰ Since heat pump installations typically require higher per-project expenditures than like-for-like air conditioner replacements, ¹⁰¹ such a requirement may slightly reduce home treatment volumes and affect the program's ability to achieve proposed energy savings goals. Thus, exceptions would be necessary in certain circumstances, including those involving customer eligibility, projected bill impacts, installation feasibility, or installation costs. Accordingly, any adopted requirement should provide flexibility to address customer-specific conditions and implementation constraints. While PG&E is amenable to prioritizing heat pump technology when replacing central A/C units, PG&E remains neutral on the Commission explicitly requiring heat pump technology when replacing Central AC units.

⁹⁷ Exhibit (PG&E-01E), p. 4-48, line 4 to p. 4-49, line 8; p. 4-53, line 17 to p. 4-54, line 9.

⁹⁸ SC-01, p. 68, line 19 to p. 69, line 4.

⁹⁹ *Id.*

¹⁰⁰ SC-01, p. 68, lines 19-21.

¹⁰¹ Please see the average measure costs for both A/C Replacement and Heat Pump HVAC outlined in Exhibit (PG&E-01E), p. AppA-5, Table A-1.

6. TURN's Proposal to Standardize Electrification Savings.

For the fuel-substitution measures forecasted in PG&E's ESA 2028-2033 proposals, PG&E utilized Statewide Energy Efficiency Workpapers that estimate positive therm savings related to retired gas equipment alongside negative kWh savings resulting from added electric load. This approach is also consistent with how PG&E's residential Energy Efficiency programs report savings related to electrification measures.¹⁰²

TURN identifies that the energy savings approaches utilized vary between IOUs, noting that Southern California Edison (SCE) forecasted savings using a different approach from PG&E and San Diego Gas & Electric (SDG&E), and recommends standardizing IOU electrification savings approaches.¹⁰³ TURN specifically recommends that all IOUs claim positive Therm savings and negative kWh savings.¹⁰⁴

PG&E generally supports the flexibility for each ESA program to make accurate engineering decisions that reflect the customer and measure use cases in each IOU's service territories. PG&E remains neutral on standardizing this issue because TURN's recommendation is identical to the electrification energy savings approach utilized in PG&E's 2028-2033 proposals where PG&E estimates positive Therm savings and negative kWh savings.¹⁰⁵

E. ESA Budgets and Fund Shifting Rules

1. PG&E's Escalations Should Be Approved as Proposed.

a. PG&E Position

In forecasting the cost requirements necessary to support ESA program operations and measure installation, PG&E utilizes labor and non-labor escalations of 3.75 percent and 3 percent, respectively.¹⁰⁶

¹⁰² See PG&E Energy Efficiency portfolio reporting, available at: <https://cedars.cpuc.ca.gov/reports/portfolio-metrics/> (accessed Oct. 8, 2026).

¹⁰³ TURN-01, p. 25, lines 16-22.

¹⁰⁴ TURN-01, p. 26, lines 1-4.

¹⁰⁵ Exhibit (PG&E-01E), p. 4-19, fn. 34.

¹⁰⁶ Exhibit (PG&E-01E), p. 4-122, lines 5-9; p. 4-123, lines 14-18; p. 4-126, line 27 to p. 4-127, line 3.

b. Party Position(s)

1) EEC

EEC agrees that escalations are necessary for ESA, and recommends the Commission approve reasonable initial escalation assumptions.¹⁰⁷ EEC also proposes a streamlined adjustment process when documented changes between forecasts and actual program delivery costs threaten the ability to achieve authorized customer service and energy savings goals.¹⁰⁸ EEC's recommendations are based on its observed uncertainty of actual ESA delivery costs in later years of the program cycle.

2) Cal Advocates

Cal Advocates raises issues with all methodologies utilized by IOUs to escalate ESA-related expenses throughout the next program cycle.¹⁰⁹ Cal Advocates specifically recommends setting PG&E escalation rates of 2.2 percent for 2029, 2.3 percent for 2030, and zero percent for program years 2031-2033.¹¹⁰ Cal Advocates' justification for the reduced escalation rates is based on critiques of the compounding effects of escalations on program budgets over a six-year program cycle.¹¹¹ Cal Advocates' recommendations for PG&E's escalation rates are based on their comments on PG&E's 2027 General Rate Case (GRC) I proceeding.¹¹²

3) TURN

TURN does not oppose PG&E's escalation rates specifically.

TURN makes two general recommendations:

- The Commission should direct the utilities to provide budgets without escalation, budgets with escalation, and isolate for any

¹⁰⁷ EEC Testimony, p. 10, line 211.

¹⁰⁸ EEC Testimony, p. 10, lines 211-214.

¹⁰⁹ CA-01, p. 2-4, lines 20-21.

¹¹⁰ CA-01, p. 2-7, Table 2-1.

¹¹¹ CA-01, p. 2-5, lines 9-11.

¹¹² *Id.*

proposed escalation by program and cost category for transparency.

- The Commission should direct the utilities to provide the methodology used to calculate escalation by program and cost category and the justification for the applied methodology.

c. PG&E Response

EEC

PG&E appreciates EEC's recognition of the reasonableness of forecasting future increases in the costs to deliver the ESA program effectively. However, PG&E disagrees that EEC's recommendation for an additional process to respond to external price pressures is necessary. PG&E manages adjustments in ESA implementation costs pursuant to its contracts established through the competitive solicitations process.¹¹³ As such, PG&E recommends that the Commission concur with EEC that reasonable escalation assumptions should be approved, and deny EEC's proposal to establish an additional adjustment process.

Cal Advocates

PG&E appreciates Cal Advocates' acknowledgement that PG&E has not significantly underspent its budgets and the recognition that some escalation rates for PG&E's ESA program are reasonable.¹¹⁴

However, PG&E disagrees with Cal Advocates' specific escalation recommendations and requests that the Commission accept PG&E's proposed budgets, including the methodologies used to escalate individual labor and non-labor costs. The proposed budgets are supported by escalation methodologies that are based on observed cost trends experienced through years of administering the ESA program. Denying PG&E's forecasted cost escalations risks underfunding the program and limiting goal attainment by limiting the ability to respond to real material and contractor labor cost increases. In addition, Cal Advocates' recommendations are inconsistent and under-supported.

¹¹³ See Section I of this Chapter for additional testimony on how implementation costs are managed through PG&E's ESA contract terms and conditions.

¹¹⁴ CA-01, p. 2-6, lines 11-16.

1 First, PG&E's proposed escalations for non-labor costs are based
 2 on observed increases in vendor and operating costs during the current
 3 ESA program cycle, as provided in workpapers and data responses.¹¹⁵
 4 Labor cost escalations are based on monitored wage trends and
 5 industry-specific price indices that reflect cost fluctuations pertinent to
 6 the energy utility sector, as discussed in PG&E's 2027 GRC¹¹⁶ and
 7 through data responses.¹¹⁷

8 Second, denying PG&E's proposed budgets including cost
 9 escalation risks underfunding ESA by reducing the budget necessary to
 10 implement the program. This risks underfunding both the activities
 11 required to administer ESA as well as the cost of materials and labor
 12 necessary to install ESA measures. Should the Commission reduce
 13 PG&E's ESA budgets based on Cal Advocates' recommendations, it will
 14 be more difficult for PG&E to meet its energy savings goals, due to
 15 limited funding to support installation of ESA measures, implementation,
 16 and administration activities.

17 Additionally, Cal Advocates' suggested escalation rates for PG&E
 18 are inconsistent. Specifically, Cal Advocates recommends variable
 19 rates for the ESA program through 2030 and 0 percent after 2030.¹¹⁸
 20 Cal Advocates does not provide justification for utilizing ESA escalation
 21 factors through 2030 while subsequently eliminating escalation entirely
 22 from 2030 through 2033. Cal Advocates' proposed escalation
 23 assumptions appear to be derived from recommendations made in
 24 PG&E's 2027 General Rate Case I proceeding, which is still pending as
 25 of the date of this rebuttal testimony.¹¹⁹ However, because those
 26 recommendations extend only through 2030, Cal Advocates does not
 27 provide any justification for its assumption that program delivery costs

¹¹⁵ PG&E's response to Data Request CalAdvocates_003-Q001Rev01, dated 6/3/26 in Attachment A, at the end of this chapter.

¹¹⁶ A.25-05-009, 2027 General Rate Case, Exhibit (PG&E-8), p. 3-32, line 21 to p. 3-34, line 12.

¹¹⁷ PG&E's response to Data Request CalAdvocates_005-Q005, dated 6/10/26 in Attachment A, at the end of this chapter.

¹¹⁸ CA-01, p. 2-7, Table 2-1.

¹¹⁹ *Id.*

1 will experience no escalation during the final three years of the cycle. In
 2 addition, Cal Advocates' justification for escalation based on their
 3 proposal in PG&E's 2027 GRC I is premature because it presumes the
 4 Commission has already issued a final decision in that proceeding that
 5 accepts Cal Advocates' proposal as is. However, the final decision for
 6 PG&E's 2027 GRC I is still pending.

7 Accordingly, PG&E recommends that the Commission reject Cal
 8 Advocates' escalation proposals and approve PG&E's ESA program
 9 budgets as detailed in its Opening Testimony.

10 **TURN**

11 In response to TURN's recommendations regarding escalation
 12 methodologies and reporting, PG&E's budget proposals are presented
 13 in compliance with the Commission's requirements. PG&E
 14 recommends that the Commission continue to defer to the Energy
 15 Division to develop budget proposal templates for future application
 16 cycles.

17 Please see Section G of Chapter 2 of this Rebuttal Testimony for
 18 PG&E's comments on TURN's recommendations regarding escalations.

19 **2. PG&E's Proposed Fund-Shifting Rules Should Be Approved**

20 PG&E proposes standardizing fund-shifting rules and carry-over rules
 21 across the program for (1) how funds can be shifted within years, (2) carried
 22 over between years, and (3) be used to reduce or offset the need for
 23 additional revenue collection in subsequent program years.¹²⁰ PG&E's
 24 proposed consistent fund-shifting rules are designed to (1) resolve previous
 25 inconsistencies,¹²¹ (2) help strengthen program management flexibility, and
 26 (3) support a portfolio-based approach to attain portfolio goals and deliver
 27 ESA programs while avoiding carrying large balances of unspent funds.

¹²⁰ Exhibit (PG&E-01E), p. 4-107, line 23 to p. 4-109, line 21.

¹²¹ *Id.*

1 **a. Party Position(s)**

2 **1) Cal Advocates**

3 Cal Advocates recommends implementing a mid-cycle budget
4 adjustment mechanism via a Tier 3 advice letter to minimize
5 overcollection.¹²² This proposal requires any IOU that
6 underspends by 30 percent of the total authorized budgets in 2028
7 and 2029 to submit a Tier 3 advice letter (the Mid-Cycle Budget AL)
8 by June 30 the following year to seek downward adjustment of
9 post-2029 annual budgets to 15 percent below the average of the
10 2028 and 2029 authorized budgets.¹²³ Cal Advocates also
11 recommends that any unspent funds from 2028 and 2029 will be
12 required to offset the collection the following year.¹²⁴

13 **2) TURN**

14 TURN recommends the following:

- 15 • Require application of all unspent and uncommitted funds to
16 offset the budget in the next program year.¹²⁵
- 17 • Require submittal of a Tier 1 advice letter by June 1 of each
18 year to document the application of all unspent and
19 uncommitted funds and identify the remaining collection
20 needed.¹²⁶
- 21 • Limit borrowing from future year budgets within this program
22 cycle to a specified percent of those budgets. Based on other
23 jurisdictions, TURN recommends 10 percent as a limit to place
24 on borrowing from future year budgets without more formal
25 notification and modification.¹²⁷

¹²² CA-01, p. 2-3, line 6 to p. 2-4, line 17.

¹²³ *Id.*

¹²⁴ *Id.*

¹²⁵ TURN-01, p. 38, lines 17-18.

¹²⁶ TURN-01, p. 38, lines 19-21.

¹²⁷ TURN-01, p. 38, lines 22-25.

1 **3) EEC**

2 EEC agrees with PG&E that reasonable carryover and
3 fund-shifting authority can reduce delays and allow utilities to direct
4 resources toward effective services.¹²⁸ EEC also recommends
5 approval of broader fund-shifting flexibility between program years in
6 each cycle, provided that clear policies and implementation
7 procedures accompany it.¹²⁹

8 **b. PG&E Response**

9 **1) Cal Advocates' Proposed Requirements are Overly**
10 **Burdensome and Risk Program Performance**

11 PG&E disagrees with Cal Advocates' proposed Tier 3 Advice
12 Letter process because it is overly burdensome and this process
13 could disrupt program delivery by requiring budget adjustments that
14 do not adequately account for unforeseen implementation
15 challenges or changing program conditions.

16 First, requiring downward adjustments beginning in 2030 risks
17 disrupting program delivery. Such disruptions could include delays
18 in launching new programs and measures or other anomalous
19 events that reduce authorized budget spend in 2028 and 2029,
20 similar to the delays observed in launching the MFWB programs in
21 the previous program cycle.¹³⁰

22 Second, Cal Advocates' proposal may not only prematurely
23 reduce the budgets for the years following 2029 but could also
24 prevent IOUs from deploying potential unspent funds from 2028 and
25 2029 in later years to support meeting ESA Program portfolio goals.
26 This proposal will prevent PG&E from managing ESA programs as a
27 single portfolio with cycle length goals or adapting to dynamic
28 market conditions.

29 Third, requiring a Tier 3 advice letter in June 2030 is overly
30 burdensome. This is because it requires a complex regulatory

¹²⁸ EEC Testimony, p. 10, line 215 to p. 11, line 242.

¹²⁹ *Id.*

¹³⁰ Exhibit (PG&E-01E), p. 4-14, line 8 to p. 4-15, line 1.

process when PG&E already proposed consistent, streamlined ESA fund-shifting rules that allow for unspent funds to be used to offset collections in subsequent years. These proposals mitigate risk of a large unspent funds balance¹³¹ without the need for such an AL process.

Accordingly, PG&E recommends the Commission reject Cal Advocates' suggestion for a Tier 3 AL process and approve PG&E's proposed fund-shifting rules.

2) PG&E Disagrees with TURN's Suggestions to Limit Fund-Shifting Between Years.

TURN recommends that all unspent and uncommitted ESA funds be used to offset collections in the following year and opposes expanded fund-shifting flexibility, specifically recommending a 10 percent limit for borrowing from future years.¹³² TURN argues that this approach would reduce the accumulation of unspent balances and ensure that unused funds are returned to customers more quickly.¹³³

PG&E disagrees that all unspent funds should *automatically* be used to offset collections in the following year. TURN's proposal does not adequately account for the operational flexibility necessary to manage a multi-year portfolio and achieve adopted program goals and targets. Limiting the use of unspent funds to annual collection offsets could reduce the program's ability to respond to changing participation levels, implementation needs, and cost fluctuations over the course of the cycle.

The unspent balances experienced during the 2021-2026 cycle were, in part, a consequence of existing fund-shifting limitations. Under current rules, unspent funds from MFWB, pilots, and studies are subject to restrictions on how they may be carried forward or used to offset collections and cannot generally be redirected to

¹³¹ Exhibit (PG&E-01E), p. 4-107, line 1 to p. 4-109, line 21.

¹³² TURN-01, p. 38, lines 17-25.

¹³³ TURN-01, p. 37, line 23 to p. 38, line 12.

1 support other ESA activities without additional administratively
 2 burdensome processes.¹³⁴ Thus, all four IOUs forecast
 3 accumulating significant unspent funds at the end of 2026, primarily
 4 from MFWB and pilots.¹³⁵ PG&E's proposal to standardize and
 5 expand fund-shifting flexibility is intended, in part, to address this
 6 problem—it reduces the accumulation of unspent balances by
 7 allowing available funds to be used to offset collections or efficiently
 8 deployed where they are most needed within the portfolio.

9 Accordingly, PG&E recommends that the Commission reject
 10 TURN's suggestions to require all unspent funds be used to offset
 11 collections in the following year and limit borrowing from future
 12 years. Instead, the Commission should approve PG&E's proposed
 13 flexible fund-shifting rules, which would allow unspent funds to
 14 support future portfolio objectives, reduce the need for additional
 15 revenue collection, or provide a combination of both benefits
 16 depending on program needs and customer affordability
 17 considerations.

18 **Existing Regulatory Pathways and Reporting are**
 19 **Sufficiently Transparent without Adding an Additional Tier 1**
 20 **Advice Letter**

21 PG&E disagrees with TURN's proposal to require a Tier 1
 22 advice letter by June 1 of each year to document the application of
 23 all unspent and uncommitted funds and identify the remaining
 24 collection needed. This proposal is unnecessary because PG&E
 25 already includes any unspent funds that will be used to offset
 26 collections in the annual electric and gas true-up advice letter
 27 submitted in Q4 to be effective on January 1 of the following
 28 year.¹³⁶ PG&E also reports the treatment of unspent funds in its
 29 Annual Report and to the Low Income Oversight Board (LIOB)
 30 quarterly report.

¹³⁴ D.21-06-015, p. 520, OP 181.

¹³⁵ D.26-07-007, p. 59, Table 12.

¹³⁶ See PG&E's Annual Electric True-Up AL 7797-E/E-A and Annual Gas True-Up AL 5160-G.

1 Additionally, TURN references the requirement adopted by the
 2 Commission for Bridge Year 2027 to report the exact amount of
 3 unspent funds, both committed and uncommitted, remaining at the
 4 end of 2026 along with updated 2027 program budget balances¹³⁷
 5 as justification for requiring additional Tier 1 advice letter reporting in
 6 2028-2033. The Commission required this additional transparency
 7 solely for the Bridge Funding year in response to substantial
 8 unspent funds.¹³⁸ 2027 is a one-year bridge year—while it extends
 9 the program cycle, it is not part of the 2021-2026 program cycle.
 10 The Commission found an advice letter process to be unnecessary
 11 for the 2021-2026 program cycle for most fund-shifting because it
 12 found reporting fund-shifting activities in annual reports to be
 13 sufficient.¹³⁹ Thus, the Commission's 2027 bridge funding decision
 14 is not appropriate justification for requiring reporting every year of
 15 the 2028-2033 program cycle.

16 The existing reporting processes already fulfill what TURN
 17 would like to accomplish without creating additional administrative
 18 burden to both IOUs and the Commission, therefore PG&E
 19 recommends the Commission deny TURN's proposal to submit a
 20 Tier 1 advice letter by June 1 of each year.

21 **F. ESA Design and Delivery: The Commission should Reject Cal Advocates'**
 22 **Proposal to Add an Instant Rebate Marketplace.**

23 Cal Advocates recommends that the Commission require the IOUs to
 24 transition a subset of ESA measures from direct installation to a zero-cost
 25 instant-rebate marketplace model.¹⁴⁰ Cal Advocates suggests that measures
 26 such as LEDs, smart power strips, air purifiers, refrigerators, and smart
 27 thermostats are sufficiently accessible and “easy-to-install” that customers could

¹³⁷ D.26-07-007, pp. 59-60.

¹³⁸ D.26-07-007, pp. 59-60.

¹³⁹ D.21-06-015, p. 428.

¹⁴⁰ CA-01, p. 3-4, lines 9-11.

1 obtain them directly through retail channels rather than through traditional ESA
2 delivery.¹⁴¹

3 Cal Advocates asserts that an instant-rebate approach would reduce
4 measure delivery costs, increase participation among customers who prefer not
5 to receive in-home services, and allow utilities to treat more customers with
6 existing ESA funding.¹⁴² Cal Advocates states that current ESA delivery costs
7 for certain measures exceed comparable retail prices and that transitioning
8 these measures to a marketplace model would improve overall portfolio
9 cost-effectiveness and energy-savings performance.¹⁴³

10 **Cal Advocates' Instant Rebate Marketplace Proposal is**
11 **Underdeveloped and should not be Mandatory.**

12 PG&E shares Cal Advocates' objective of delivering customer benefits as
13 efficiently as possible and appreciates Cal Advocates' efforts to identify
14 opportunities to improve ESA cost-effectiveness and program delivery.
15 However, PG&E does not support requiring utilities to implement an
16 instant-rebate marketplace model based on the current record.

17 Cal Advocates' proposal is underdeveloped and lacks sufficient analysis to
18 demonstrate that the proposed delivery model would produce the
19 cost-effectiveness, customer, or programmatic benefits asserted by
20 Cal Advocates.

21 First, it is not sufficiently demonstrated that the proposed model will increase
22 cost-effectiveness. While Cal Advocates' analysis compares ESA measure
23 costs to products available through mainstream retailers and suggests that an
24 instant-rebate approach would lower delivery costs, the analysis does not
25 estimate the costs necessary to establish, administer, maintain, audit, or
26 otherwise operate the proposed marketplace in their testimony.¹⁴⁴ PG&E

¹⁴¹ CA-01, p. 3-4, line 27 to p. 3-5, line 4.

¹⁴² *Id.*

¹⁴³ CA-01, p. 3-4, lines 17-26.

¹⁴⁴ For example, SoCalGas reports in its 2025 Energy Efficiency Annual Report that approximately 22 percent, or \$2.2 million of the \$9.5 million annual expenditures for its Energy Efficiency Residential Marketplace (SCG3829) resulted from expenditures other than "Incentives and Rebates," which include ME&O, Non-Incentive Direct Implementation, and Administrative expenditures. SoCalGas Energy Efficiency Programs 2025 Amended Annual Report, 2025 Annual Report Narratives and Spreadsheets, tab T-1 Program Data.

1 propounded discovery requesting documentation including analysis,
 2 calculations, and workpapers, specifically those that support “establishing...
 3 maintaining, auditing, administering, or otherwise operating the proposed
 4 instant-rebate marketplace”.¹⁴⁵ Cal Advocates’ response simply referred PG&E
 5 back to their testimony and stated that they relied on marketplace reports.
 6 Cal Advocates provided no other analysis or calculations evaluating potential
 7 costs of implementing such a marketplace or the cost-effectiveness of such a
 8 marketplace for ESA including these costs. Accordingly, Cal Advocates’
 9 analysis does not provide evidence demonstrating that potential reductions in
 10 measure delivery costs¹⁴⁶ would outweigh the additional administrative and
 11 operational costs associated with creating and maintaining parallel program
 12 infrastructure.

13 In addition, Cal Advocates does not address several operational
 14 considerations associated with a self-install model. For example, the testimony
 15 does not explain how utilities would verify that a measure has been properly
 16 installed subject to codes and standards,¹⁴⁷ confirm that it replaced an
 17 appropriately less-efficient technology, ensure customer safety, or prevent
 18 duplication of benefits. The proposal likewise does not evaluate how a parallel
 19 marketplace offering would interact with existing ESA delivery channels or what
 20 impacts such a model could have on overall program administration and
 21 implementation.

22 PG&E also disagrees that Cal Advocates has demonstrated that the
 23 proposed marketplace model would adequately support customer needs or
 24 advance ESA program objectives. For example, Cal Advocates’ analysis
 25 characterizes certain measures as “easy-to-install,” but does not provide a clear
 26 definition of that term or evaluate the circumstances of customers who may
 27 require installation assistance. ESA delivery provides more than the measure

¹⁴⁵ Cal Advocates’ response to PG&E Data Request PGE_CalAdvocates_002-Q02(a), dated 10/2/26 in Attachment A, at the end of this chapter.

¹⁴⁶ In this context, “measure delivery” refers to solely measure materials and installation costs.

¹⁴⁷ Please see more details on PG&E ESA’s inspections proposals in Opening Testimony, Exhibit (PG&E-01E), p. 4-35, lines 1-8; p. 4-60, lines 27-33; and Ch. 4, Attachment 1.

1 itself; it also provides customers with installation services¹⁴⁸ and quality
 2 assurance¹⁴⁹ that may be particularly important for customers with mobility
 3 limitations, accessibility challenges, or other barriers to self-installation.

4 Finally, Cal Advocates acknowledges that traditional installation services
 5 could continue alongside the proposed marketplace model. However,
 6 introducing a parallel delivery channel may create additional customer
 7 complexity and confusion regarding measure eligibility, delivery pathways, and
 8 available program services. PG&E notes that customer confusion regarding
 9 multiple program pathways has previously been recognized by the Commission
 10 as a concern when evaluating ESA program design alternatives.¹⁵⁰ PG&E
 11 continues to share this concern.

12 Accordingly, PG&E recommends that the Commission reject Cal Advocates'
 13 proposal to require an instant-rebate marketplace model. While PG&E remains
 14 open to evaluating innovative delivery approaches that may improve customer
 15 experience and program cost-effectiveness, Cal Advocates has not
 16 demonstrated that the proposed marketplace model is sufficiently developed or
 17 supported to warrant mandatory implementation.

18 **G. ME&O [Witness: Erik Olsen]**

19 **1. PG&E Position**

20 PG&E values contractors' role in qualifying leads, engaging
 21 prospective customers, addressing customer questions, and supporting
 22 customer participation in ESA. Under the current model, contractors receive
 23 pre-screened customer lists and provide ongoing feedback that helps
 24 improve targeting and customer acquisition efforts. PG&E's coordinated

¹⁴⁸ ESA California Installation Standards v1.5 (published Jan. 1, 2026), available at: https://pda.energydataweb.com/api/downloads/4259/PGE%20ESAP%20ISv1.5_January%201%2C%202026_s.pdf (accessed Oct. 8, 2026).

¹⁴⁹ ESA subcontractors are required to comply with local codes and standards as well as the ESA Statewide Installation Standards Manual to ensure that work is performed safely and correctly. Customers express high satisfaction with the ESA program, as demonstrated by achieving a customer satisfaction score of 88 percent in 2025 as measured by post-treatment survey. Satisfaction with installation and delivery services is one of the factors evaluated in the customer satisfaction score. A.19-11-003, PG&E 2025 ESA Annual Report, p. 18.

¹⁵⁰ D.21-06-015, p. 199.

marketing model with contractors is effective and should continue without modification.

2. EEC

EEC proposes that each IOU be directed to establish a dedicated contractor marketing and outreach budget for the 2028-2033 ESA cycle.¹⁵¹ EEC also suggests, “Contractor allocations can be reasonably proportionate to each contractor’s authorized workload, contract value, geographic responsibility, or customer-enrollment obligations.”¹⁵²

Under EEC’s proposal, PG&E’s proposed ME&O budget for ESA would be reallocated to support contractors’ upfront outreach costs regardless of whether each contact results in enrollment, with allocations proportionate to authorized workload, contract value, geographic responsibility, or customer-enrollment obligations, and subject to eligible-cost standards, documentation, reporting, and outcome metrics.¹⁵³

a. PG&E Response

EEC’s proposal to reallocate portions of utility-funded marketing budget to ESA contractors should be rejected. EEC has not demonstrated a program need, identified an administrable allocation method, or shown that the proposal would improve customer outcomes. EEC’s unworkable proposal would duplicate existing outreach functions, fragment program marketing, and divert limited resources from customer-facing campaigns to contractor-level budget administration without a demonstrated benefit over PG&E’s existing coordinated approach to utility and contractor customer acquisition efforts.

1) EEC’s Unsupported Estimate Regarding IOU-Provided Leads Does Not Justify a New Funding Mechanism.

EEC’s assertion that IOU-provided leads result in enrollments fewer than 10 percent of the time is admittedly anecdotal and is unsupported by any IOU-specific analysis, underlying data, or

¹⁵¹ EEC Testimony, p. 15, lines 351–352.

¹⁵² EEC Testimony, p. 15, lines 352–354.

¹⁵³ EEC Testimony, p. 13, line 299 to p. 15, line 354.

workpapers. In response to PG&E's data request to EEC, EEC admits that its assertion that IOU-provided leads result in enrollments fewer than 10 percent of the time is anecdotal and is unsupported by any IOU-specific analysis, underlying data, or workpapers:

EEC did not conduct a survey or statistical analysis and did not prepare or rely upon a spreadsheet, calculation, member report, database, or other separate document to derive the referenced percentage. Accordingly, EEC does not have an IOU-specific or time-period-specific calculation underlying the statement and has no data, calculations, member reports, or analytical workpapers responsive to this request to produce.¹⁵⁴

The Commission should reject EEC's proposal because it provides no substantiated evidentiary basis for its conversion estimate. EEC's estimate does not support the separate contractor marketing-funding mechanism EEC proposes.

2) PG&E Data Disproves EEC's Anecdotal Assertions. More Than One-Third of Homes Treated Through PG&E's ESA Program In 2025 Received Targeted Marketing During the Year.

Of the 60,777 homes treated through the program in 2025, 21,841, or 36 percent, (versus EEC's anecdotal 10 percent) had received direct mail or email related to ESA Main, the Whole Home Pilot, or other targeted ESA offers. This 36 percent is in addition to homes treated resulting from paid digital media or other forms of outreach where customer-specific attribution is limited.

3) EEC's Proposed Allocation Framework is Undefined and Unworkable.

EEC suggests basing allocations on "authorized workload, contract value, geographic responsibility, or customer-enrollment obligations."¹⁵⁵ However, EEC does not identify which factor would control, how the factors would be weighted, or how allocations

¹⁵⁴ See Attachment A to this chapter for EEC's response to PG&E Data Request PGE_EEC001 and EEC002, dated 9/22/26.

¹⁵⁵ EEC Testimony, p. 15, lines 351-354.

1 would adjust to changes in production, territory conditions, or
2 enrollment performance. As stated above, EEC's proposal is
3 unsupported by any workpapers.

4 Based on PG&E's expertise, each of EEC's factors could
5 produce materially different results, for example:

- 6 • Authorized workload could reward assigned volume without
7 regard to actual marketing need or demonstrated performance.
- 8 • Contract value could favor larger contractors even where
9 smaller contractors serve harder-to-reach customers or
10 territories.
- 11 • Geographic responsibility could produce inconsistent allocations
12 because customer density, language needs, media costs, and
13 market saturation differ across territories.
- 14 • Enrollment obligations could reward projected targets rather
15 than efficient and verified customer acquisition.

16 Without a defined methodology, objective weights, performance
17 thresholds, and adjustment rules, the proposal would invite
18 allocation disputes and create uncertainty for contractors, program
19 administrators, and utilities, and would result in new administrative
20 costs and burden. For example, PG&E would need to establish
21 eligible-cost rules, approve budgets, review documentation,
22 distinguish allowable marketing costs from overhead or costs
23 already recovered through contract pricing, verify incremental
24 expenditures, monitor outcomes, prevent double recovery, and audit
25 compliance.

26 EEC's suggested approach to documentation, reporting, and
27 metrics for leads, applications, and enrollments confirms that the
28 proposal would require a new oversight structure, not a simple
29 funding adjustment. A contractor-by-contractor reimbursement
30 system would shift toward transaction-level oversight of fragmented
31 activities and create risk that ratepayer funds would be redirected to
32 pay for an administratively burdensome structure that is unjustified,
33 and unnecessary because PG&E's ESA ME&O has been and
34 continues to be effective.

4) PG&E's Coordinated Marketing Model With Contractors Should Continue Without Modification.

PG&E did not make any proposal to use its marketing budget for ESA contractors as PG&E's current approach is sufficient. For example, as described in PG&E's August 2026 ESA Monthly Report, contractor outreach activities complement PG&E's acquisition campaigns. Contractors conduct outreach using assigned lead lists, canvassing activities, contractor-generated customer lists, and referrals generated through PG&E marketing efforts.¹⁵⁶

This coordinated approach preserves a unified, data-informed customer acquisition strategy while recognizing contractors' field-level role. It maximizes limited marketing resources, avoids fragmented outreach efforts, and reduces the risk of contractors competing against one another for the same eligible customers.

For these reasons, the Commission should reject EEC's recommendation for dedicated contractor marketing allocations.

H. ESA Reporting [Witness: Jackson Pilutti]

PG&E proposes continuing the existing process for updating and streamlining the overall reporting structure and usability of program data, which includes working with the Energy Division to improve the reporting process.¹⁵⁷ TURN recommends three additional ESA reporting requirements, specifically that the IOUs report energy savings in MMBtu, provide additional gas/electric portfolio reporting, and provide additional information about HCS measures.¹⁵⁸ PG&E disagrees with these recommendations and includes its responses in the following sections.

¹⁵⁶ A.19-11-003, Monthly Report of PG&E on IQP for August 2026, p. 4, Section 1.2.

¹⁵⁷ Exhibit (PG&E-01E), p. 5-22, line 23 to p. 5-23, line 27.

¹⁵⁸ TURN-01, p. 43, lines 11-19.

1. TURN's million British Thermal Units (MMbtu) Reporting Requirement Is Duplicative and Unnecessary

TURN recommends requiring IOUs to report energy savings in an additional, third metric, suggested to be annual and lifetime MMBtu.¹⁵⁹ TURN previously made this request in the consolidated IQP 2027 Bridge Funding Proceeding.¹⁶⁰ The Commission declined to make modifications to reporting in the IQP Bridge Funding Decision, citing that reporting requirements should be proposed and considered in the 2028-2033 IQP applications.¹⁶¹

PG&E disagrees with this requirement for the same reasons outlined in its 2027 Bridge Funding Rebuttal Testimony,¹⁶² specifically that reporting MMBtu is duplicative. TURN has not provided sufficient justification for the benefit of converting energy savings into another redundant unit of energy. Reporting MMBtu does not assist in evaluating customer bill savings, non-energy benefits, or GHG emissions because it does not deliver additional evaluative ability for these categories beyond what is already reported. PG&E respectfully requests that the Commission deny this unnecessary additional requirement and also approve the reporting framework proposed by PG&E¹⁶³ and further detailed in Chapter 5 of this Rebuttal Testimony.

2. TURN's Request for Additional Gas/Elec Reporting Is Unnecessary.

TURN similarly reiterates its recommendation, previously made in the 2027 Bridge Funding Proceeding, to "plan and report electric and gas portfolio costs, savings, benefits, and cost-effectiveness."¹⁶⁴ TURN further mentions that it was unable to examine the costs, savings, benefits, and cost-effectiveness of electric and gas portfolios without requesting this

¹⁵⁹ TURN-01, p. 43, lines 11-19.

¹⁶⁰ TURN-01, p. 42, line 14 to p. 43, line 19.

¹⁶¹ D.26-07-007, p. 53.

¹⁶² A.25-06-024, Exhibit (PG&E-04), p. 2-22, lines 9-17.

¹⁶³ Exhibit (PG&E-01E), p. 5-22, line 23 to p. 5-23, line 27.

¹⁶⁴ TURN-01, p. 43, lines 11-19.

information in discovery from PG&E. PG&E acknowledges this statement, and notes TURN received the information from PG&E.¹⁶⁵

PG&E disagrees that additional reporting requirements are necessary on the grounds that TURN's requests are already satisfied through current reporting or are overly burdensome to add. IOUs already report measure-level costs and savings as well as portfolio-level cost-effectiveness.¹⁶⁶ TURN has not demonstrated that the proposed reporting would materially improve transparency or program oversight. Additionally, measure-level cost-effectiveness for HCS measures was provided to TURN in PG&E's 2028-2033 Application workpapers.¹⁶⁷

Moreover, PG&E's dual-fuel utility portfolio includes measures that provide both gas and electric benefits. Allocating benefits and cost-effectiveness as TURN requests would require subjective assumptions, because dual-fuel measures offer benefits from both fuels. This is particularly subjective because dual-fuel measures deliver health, comfort, and safety non-energy benefits that are not directly attributable to a specific fuel source.¹⁶⁸

For these reasons, PG&E requests that the Commission deny TURN's request for additional reporting requirements and instead approve the reporting framework proposed by PG&E¹⁶⁹ and further detailed in Chapter 5 of this Rebuttal Testimony.

3. TURN's HCS Suggestions are Met Through Current Reporting.

PG&E currently denotes health, comfort, and safety measures in its monthly and annual reports. TURN requests that the Commission require

¹⁶⁵ TURN-01, Appendix B, pp. 78-83, PG&E's response to Data Request TURN_001-Q001Atch001, "IQPPY28-33_DR_TURN_001-Q001Atch001."

¹⁶⁶ A.19-11-003, PG&E 2025 ESA Annual Report, Appendix A, p. 87, ESA Table 1 and p. 95, ESA Table 3.

¹⁶⁷ PG&E's response to Data Request TURN_001-Q005Rev01, dated 7/17/26 in Attachment A, at the end of this chapter, which provided "IQP_2028-2033_WP_PGE_20260109_Ch04_ESA_ESACET Working Documents."

¹⁶⁸ PG&E's response to TURN's 2027 Bridge Funding data request, A.25-06-024, PG&E's response to Data Request TURN_004-Q002 "IQPBridgeFundingPY27_DR_TURN_004-Q002."

¹⁶⁹ Exhibit (PG&E-01E), p. 5-22, line 23 to p. 5-23, line 27.

IOUs to include certain HCS information in reporting.¹⁷⁰ Because PG&E already denotes HCS measures in monthly and annual reporting,¹⁷¹ PG&E disagrees with specific additional and duplicative Commission requirements relating to HCS reporting. Instead, PG&E requests that the Commission approve the reporting framework proposed by PG&E¹⁷² and further detailed in Chapter 5 of this Rebuttal Testimony.

I. Solicitations and Contracting

PG&E proposed competitive solicitations to procure third party implementation for ESA Main and MFWB programs, as detailed in its Opening Testimony.¹⁷³ Both Cal Advocates and EEC make recommendations that would influence the competitive solicitations process. Cal Advocates recommends specific fixed cost contract terms in ESA contracts, while EEC makes two recommendations requesting temporary cost adjustments and specific 30-day payment terms. PG&E disagrees with these recommendations and responds to each recommendation in the following sections.

1. Cal Advocates' Proposal To Require Fixed Cost Contracting Terms is Underdeveloped and Should Be Rejected.

PG&E currently negotiates ESA implementation contracts using fixed-prices for measure delivery and materials. ESA measure installation labor rates are based on pre-negotiated unit prices derived from workpaper installation times¹⁷⁴ and competitively sourced labor rates that are reviewed for reasonableness through PG&E's sourcing process. Because subcontractors are not reimbursed based on actual hours worked, subcontractor profitability is driven by operational efficiency and overhead management rather than automatic markups on labor or material costs. To

¹⁷⁰ TURN-01, p. 43, lines 11-19.

¹⁷¹ For example, see A.19-11-003, Monthly Report of PG&E on IQP for August 2026, p. 28, ESA Table 2, fn. 7, which identifies HCS measures.

¹⁷² Exhibit (PG&E-01E), p. 5-22, line 23 to p. 5-23, line 27.

¹⁷³ Exhibit (PG&E-01E), p. 4-103, line 6 to p. 4-106, line 6.

¹⁷⁴ ESA uses measure workpapers, such as the Statewide Energy Efficiency Workpapers available through: <https://www.caetrm.com/> (accessed Oct. 13, 2026), to estimate measure installation time, defined as the amount of labor hours estimated to install a given measure.

capture economies of scale and ensure quality and standardization of measures installed, PG&E contracts with a third-party to provide some of the materials for the ESA program. Under the bulk purchasing model, this provider manages the procurement, warehousing, and fulfillment of designated materials, supplying subcontractors with products needed to complete installations. For non-supplied materials, contractors are generally compensated using fixed or capped measure pricing and, where applicable, are required to invoice actual material costs, which limits the opportunity for excessive material markups and helps protect against unreasonable pricing.

Cal Advocates suggests that the Commission require utilities to negotiate ESA contracts with “fixed cost” elements and eliminate any provisions that include guaranteed markups. This recommendation appears to assume that ESA contractors are compensated through actual-cost reimbursement with guaranteed markups on labor and materials, and that additional fixed-cost contracting terms would produce meaningful labor or material savings.

PG&E shares Cal Advocates’ objective of prudent use of ratepayer funds and cost-effective delivery of ESA services. However, Cal Advocates’ recommendation is premised on the assumption that additional fixed price contracting requirements would produce meaningful reductions in program expenses. Cal Advocates does not demonstrate that existing ESA contract structures result in unreasonable costs, nor does it provide sufficient evidence that the proposed contracting requirements would result in measurable cost reductions or improved customer outcomes as opposed to alternative contracting structures. This is confirmed in Cal Advocates’ response to PG&E’s discovery requesting workpapers or other analysis supporting their recommendation, where Cal Advocates provided no workpapers or analysis regarding fixed cost contract terms beyond what is included in their testimony.¹⁷⁵

PG&E disagrees that the Commission should prescribe a specific contracting structure for ESA implementation activities. PG&E opposes this

¹⁷⁵ Cal Advocates’ response to PG&E Data Request PGE_CalAdvocates_002-Q001(c), dated 10/2/26 in Attachment A, at the end of this chapter.

1 recommendation because ESA implementation contracts already
 2 incorporate substantial fixed-price protections, and the recommendation
 3 provides limited evidence that meaningful additional savings are available
 4 through prescriptive contract terms. For example, labor pricing is already
 5 largely predetermined through negotiated installation rates, and because
 6 contractors are not reimbursed based on actual hours worked this already
 7 drives the efficiency recommended by Cal Advocates.¹⁷⁶ Cal Advocates'
 8 recommendation may therefore overstate the opportunity for savings.

9 In addition, Cal Advocates' recommendation does not fully account for
 10 the operational services provided by a centralized material supplier, which
 11 performs procurement, warehousing, inventory management, logistics, and
 12 distribution functions that reduce program risk and administrative burden.
 13 PG&E's bulk materials supplier negotiates volume discounts through bulk
 14 purchasing, maintains inventory levels that reduce stockout risk, and helps
 15 stabilize measure pricing over time. Contract terms for bulk purchasing and
 16 implementation are determined through the competitive solicitations process
 17 in a manner that supports both program success and the needs and
 18 operations of the bidding parties.

19 Finally, Cal Advocates' assertion that existing contract structures
 20 inherently encourage higher-cost measure selection is unsupported by the
 21 record. PG&E provided Cal Advocates with details of the procurement
 22 controls such as those designed to review bulk supply measure costs.¹⁷⁷
 23 However, Cal Advocates' analysis is insufficient because their testimony
 24 does not evaluate existing procurement controls, sourcing practices,
 25 competitive solicitations, or other mechanisms used to review measure
 26 costs and supplier performance, including current controls written into
 27 PG&E's contracts.

28 Accordingly, PG&E recommends that the Commission reject
 29 Cal Advocates' proposal to mandate specific fixed-cost contracting

¹⁷⁶ CA-01, p. 3-12, line 17 to p. 3-14, line 6.

¹⁷⁷ PG&E provided all ESA contracts—including those for Bulk Materials—to Cal Advocates in discovery, as referenced in CA-01C, Confidential Appendix E, p. E-1. Cal Advocates testimony referenced the ESA Bulk Materials Contract which includes details of the procurement controls such as those designed to review bulk supply measure costs.

requirements and instead retain flexibility to utilize procurement structures that best balance cost containment, implementation effectiveness, service quality, and customer outcomes.

2. EEC's Proposals for Temporary Cost Adjustment Mechanisms Are Redundant and Unnecessary

PG&E currently manages ESA contract costs, and any associated adjustments, through authorized program budgets and established internal processes designed to address changing market conditions, implementation costs, and operational needs within approved funding levels.

EEC suggests requiring IOUs to submit proposals to introduce a temporary cost-adjustment mechanism, purporting that the proposal would allow IOUs to respond more quickly to significant unforeseen cost pressures.¹⁷⁸

PG&E opposes this proposal because a separate temporary cost-adjustment mechanism is not necessary for ESA. EEC's proposal is unsupported as they failed to provide sufficient justification or supporting workpapers to support its proposal.¹⁷⁹ IOUs already deploy existing tools to evaluate and respond to unforeseen cost pressures. PG&E has the internal system/process capability to address cost adjustments by developing new measures or modifying existing measures when deemed necessary and appropriate. For example, to support contractors facing increased fuel costs in 2026, PG&E created a new fuel surcharge measure within its system to address the immediate need.¹⁸⁰

Therefore, introducing a vague new requirement is not necessary, and could instead create administrative complexity, duplicate existing flexibility, and impose additional review burdens without demonstrated incremental benefit. Existing budget planning and cost-management processes provide a more practical and efficient path for addressing temporary or unforeseen cost pressures while preserving accountability and fiscal discipline.

¹⁷⁸ EEC Testimony, p. 4, line 44 to p. 5, line 61

¹⁷⁹ EEC's response to PG&E Data Request PGE_EEC001, dated 9/22/26 in Attachment A, at the end of this chapter.

¹⁸⁰ EEC Testimony, p. 11, lines 246-248.

Moreover, it is more appropriate for contract cost adjustment mechanisms to be addressed through the solicitation and contracting process than a regulatory forum. In fact, the Commission previously denied determining operational contract terms in D.21-06-015, stating that the Commission does not “plan to micromanage the IOU contract terms so long as the terms comply with this decision and work towards achieving the program goals.”¹⁸¹

3. EEC’s Proposals for 30-day Payment Terms

PG&E appreciates its ESA contractor workforce and PG&E acts in good faith to satisfy all its obligations, including payment terms, under its ESA contracts. PG&E currently manages contractor payment timing through negotiated contract terms and conditions between the IOU and its third-party implementers and contractors, pursuant to existing statewide requirements to remit funds within 30 days of the satisfactory completion of ESA activities.¹⁸² Project payment requirements reflect the specific scope of work, documentation requirements, quality assurance obligations, invoice procedures, and performance expectations applicable to each agreement.

EEC proposes that the Commission modify existing requirements¹⁸³ to specifically rule that the existing 30-day payment period for a project begins when the contractor submits a complete job package,¹⁸⁴ and additionally require the IOUs and program administrators to determine within that 30-day period whether satisfactory completion occurred.¹⁸⁵

PG&E understands the importance of timely contractor payment and notes that stipulated payment terms are reflected in each ESA contract. The implementation of contract payment timing and compliance with contractual requirements is most appropriately defined through negotiated contract terms and conditions between PG&E and its implementers and contractors. For example, modifications to such payment terms should occur within

¹⁸¹ D.21-06-015, p. 297.

¹⁸² See D.01-05-033, p. 91, OP 13.

¹⁸³ *Id.*

¹⁸⁴ EEC Testimony, p. 13, lines 296-298.

¹⁸⁵ *Id.*

1 established protocols such as a contract change order or entering into a new
2 contract with updated payment terms. Unresolved non-compliance with
3 payment terms can be remedied by asserting a cause of action for breach of
4 contract.

5 Additionally, to PG&E's knowledge, its ESA program has facilitated
6 timely payments to implementers and contractors during the current
7 program cycle and has not received critical feedback from implementers or
8 contractors on ESA program payment terms.

9 PG&E also disagrees that submission of a complete job package should
10 automatically trigger the Commission's 30-day payment requirement
11 because this may inadvertently limit oversight of ESA program expenditures.
12 A complete job package alone may not fully demonstrate satisfactory
13 completion, particularly where inspection, correction, documentation review,
14 or customer confirmation is required before payment can be approved. For
15 example, establishing a Commission-directed payment trigger could
16 inadvertently limit the flexibility utilities need to verify completed work,
17 resolve deficiencies, and ensure that program funds are disbursed only after
18 contractual and program requirements have been satisfied. As EEC
19 acknowledges, contractor work must satisfy applicable program and
20 quality-control requirements before payment is made.¹⁸⁶

21 Accordingly, PG&E recommends that contractor payment provisions
22 continue to be governed by existing Commission guidance and further
23 implemented through negotiated contract terms and conditions as
24 determined through the competitive solicitations process. This supports
25 appropriate oversight of ESA program expenditures and allows specific
26 payment provisions to be tailored to each implementation arrangement.

27 **J. Workforce, Education, and Training: PG&E's WE&T Proposals Meet** 28 **Workforce Needs Without Additional Requirements**

29 PG&E recognizes that a solid workforce development framework is critical to
30 ESA program success. PG&E proposes multiple workforce development
31 activities for 2028-2033, including requiring its contracted implementers to
32 develop and manage structured on-the-job training programs for their

¹⁸⁶ EEC Testimony, p. 12, lines 271-275.

workforce.¹⁸⁷ This approach responds directly to contractor feedback regarding the need for additional hands-on learning opportunities and onboarding support to on-demand training resources. PG&E proposes incorporating this requirement into its competitive solicitation process.

EEC recommends that PG&E adopt the basic structure of SoCalGas's proposed WE&T model as a statewide framework, which would require each IOU to establish a dedicated contractor-level training allocation to reimburse ESA-specific training costs.¹⁸⁸

PG&E agrees that workforce development is critical to successful ESA delivery and already provides substantial training support through its train-the-trainer model, on-demand training resources, Natural Gas Appliance Testing training, and proposed on-the-job training requirements for implementers.¹⁸⁹ PG&E's proposed approach is designed to strengthen workforce readiness while leveraging existing training investments and contractor expertise.

PG&E disagrees that an additional contractor-level training reimbursement mechanism is necessary. Contractor compensation is established through a competitive solicitation process and is intended to account for reasonable business costs, including hiring, onboarding, supervision, and employee training factoring in their employee turnover rate. EEC has not established that existing compensation structures and PG&E's proposed training investments are insufficient to support workforce development or that a separate reimbursement mechanism would improve program outcomes. In response to PG&E's discovery requesting supporting workpapers, EEC responded that no additional analysis supported EEC's proposals.¹⁹⁰

Additionally, EEC's recommendation does not adequately account for differences in IOU program design and workforce structure. The proposed statewide framework is based on SoCalGas's implementation model, which differs from PG&E's ESA delivery approach. PG&E utilizes third-party

¹⁸⁷ Exhibit (PG&E-01E), p. 4-98, line 1 to p. 4-101, line 20.

¹⁸⁸ EEC Testimony, p. 5, line 67 to p. 8, line 163.

¹⁸⁹ Exhibit (PG&E-01E), p. 4-98, line 1 to p. 4-101, line 20.

¹⁹⁰ EEC's response to PG&E Data Request PGE_EEC001, dated 9/22/26 in Attachment A, at the end of this chapter.

1 implementers that are responsible for managing contractor networks, workforce
 2 development activities, and field operations,¹⁹¹ while SoCalGas contracts more
 3 directly with installation providers.¹⁹² As a result, training responsibilities,
 4 contractor oversight, and workforce management functions are allocated
 5 differently across the two program structures. EEC has not demonstrated that a
 6 workforce development model designed for one IOU's implementation approach
 7 would produce similar benefits if applied to a substantially different program
 8 structure.

9 As such, PG&E opposes EEC's unsupported recommendation because it
 10 would be duplicative of PG&E's existing workforce development structure and
 11 could create additional costs without a demonstrated need for separate
 12 contractor-level reimbursement.

13 **K. ESA Measures: Oppose Sierra Club's Proposal to Provide Air Purifiers to**
 14 **ESA Basic Customers With No Documentation of Income.**

15 PG&E proposes offering air purifiers to customers meeting specified
 16 need-state criteria, consistent with its approved tiered ESA program design.¹⁹³
 17 All need-state specific measures are offered through PG&E's Plus Tier.

18 Sierra Club recommends all IOUs offer air purifiers to specific need states
 19 as PG&E does,¹⁹⁴ and specifically requests that the Commission increase
 20 installation rates by requiring air purifiers to be offered through PG&E's Basic
 21 Tier.¹⁹⁵

22 PG&E takes no position on whether similar proposals may be appropriate
 23 for other IOUs because each IOU proposes different measure mixes, eligibility
 24 structures, and program designs.

25 PG&E disagrees with modifying its proposed need-state eligibility
 26 requirements. As the Commission approved in D.21-06-015, PG&E's tiered
 27 program design is intended to balance customer access with targeted delivery of

¹⁹¹ Exhibit (PG&E-01E), p. 4-32, line 14 to p. 4-35, line 20.

¹⁹² SCG-01, p. 168, lines 11-16.

¹⁹³ Exhibit (PG&E-01E), p. 4-70, line 3 to p. 4-73, Table 4-26.

¹⁹⁴ SC-01, p. 99, lines 8-12.

¹⁹⁵ SC-01, p. 99, line 13 to p. 100, line 3.

measures based on identified customer needs.¹⁹⁶ Under this structure, the Basic Tier is designed to minimize barriers to participation, including providing a pathway for customers who may not yet have completed full income verification to access basic services. More specialized measures, including need state measures, are available through the Plus Tier, where eligibility is determined based on customer need states and expected customer benefit.

Expanding air purifier eligibility beyond PG&E's proposed need-state framework would increase projected installation rates and program expenditures while reducing the portfolio's forecasted energy savings performance. Because air purifiers do not contribute energy savings,¹⁹⁷ broader deployment would reduce cost-effectiveness and adversely affect PG&E's ability to achieve energy-savings goals and targets.

Accordingly, PG&E recommends that the Commission reject Sierra Club's proposal to modify PG&E's air purifier eligibility requirements and adopt PG&E's proposed need-state approach.

L. Conclusion

For the reasons discussed above, PG&E recommends that the Commission approve PG&E's ESA proposals, including:

- The electrification strategy;
- The budgets, escalation methodologies, and flexible fund-shifting framework;
- The measure mix offerings and eligibility framework;
- The program design and delivery model;
- The marketing, outreach, workforce development, reporting, solicitation, and contracting activities; and
- The remaining uncontested ESA proposals.

Approval of PG&E's proposals supports continued delivery of cost-effective energy savings and bill-reduction opportunities for income-qualified customers, expands access to electrification technologies, maintains program flexibility necessary to achieve portfolio goals and targets, and enables effective administration of the ESA Program throughout the 2028-2033 program cycle.

¹⁹⁶ D.21-06-015, pp. 192-193.

¹⁹⁷ Exhibit (PG&E-01E), p. AppA-6, Table A-1.

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 4

ATTACHMENT A

ESA PROGRAM

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

PG&E Data Request No.:	CalAdvocates_003-Q001
PG&E File Name:	IQPPY28-33_DR_CalAdvocates_003-Q001Rev01
Request Date:	May 21, 2026
Requester DR No.:	CalAdv- PWL-PGE-2026-05
Requesting Party:	Public Advocates Office
Requester:	Pui-Wa Li
Date Sent:	June 3, 2026 Rev01: July 9, 2026
PG&E Witness(es):	Various

The following questions pertain to Application of Pacific Gas and Electric Company's (U 39 M) Application for Approval of Its 2028-2033 Income-Qualified Programs (PG&E's Application) filed on January 9, 2026, in the consolidated Application (A.) 26-01-003.

QUESTION 001

Please provide all tables presented in the following as part of PG&E's Application in Excel format, including calculation formulae supporting the figures presented:

- Exhibit PG&E-1
- PG&E's Application
- Supporting workpapers. PG&E's Application, at 16, states that "[s]upporting workpapers will be available soon after the Application is filed."

ANSWER 001 REVISED 01

Please note that workpaper attachment "*IQP_2028-2033_WP_PGE_20260109_Ch04_Strategic Sourcing Process Summary_PROP.pptx*" within the "04. ESA WPs" zipped folder contains PROPRIETARY and/or CONFIDENTIAL information as described in the Confidentiality Declaration dated January 5, 2026.

Please see attachments to this response, as summarized below.

Tables and Workpapers	Attachment
------------------------------	-------------------

Exhibit PG&E-1	IQPPY28-33_DR_CalAdvocates_003-Q001Rev01Atch01.xlsx IQPPY28-33_DR_CalAdvocates_003-Q001Rev01Atch02.xlsx IQPPY28-33_DR_CalAdvocates_003-Q001 Rev01Atch03PROP.xlsx
PG&E's Application	Table 1: IQPPY28-33_DR_CalAdvocates_003- Q001 Rev01Atch01.xlsx, tab "Ch 1 Table 1-4" Table 2: IQPPY28-33_DR_CalAdvocates_003- Q001 Rev01Atch01.xlsx, tab "Ch 1 Table 1-3" Appendix A: IQPPY28-33_DR_CalAdvocates_003-Q001Rev01Atch04.xlsx Appendix B: IQPPY28-33_DR_CalAdvocates_003-Q001Rev01Atch05.xlsx
Supporting workpapers. PG&E's Application, at 16, states that "[s]upporting workpapers will be available soon after the Application is filed."	IQPPY28-33_DR_CalAdvocates_003-Q001Rev01Atch03PROP.xlsx

PG&E has provided Excel versions of the testimony tables to the extent such tables exist in spreadsheet format and/or contain calculations supporting the figures. Tables 2-2, 2-11, 2-22, 3-2, 3-19, 4-2, 4-15, 4-16, 4-17, 4-20, 4-24, 4-25, 4-26, 4-27, 4-35, 5-1, 5-2, 5-3, 5-5, 6-1 and chapter attachments are narrative or text-only in nature and do not contain calculations, formulas, or underlying spreadsheets. Accordingly, no Excel version or supporting calculation formulae exist for those tables and they are not included in this response.

Chapter 6 tables 6-2, 6-3, 6-4, 6-5, 6-6, 6-7, 6-8, 6-9, 6-10, 6-11, 6-12 are included in IQPPY28-33_DR_CalAdvocates_003-Q001Rev01Atch03PROP.zip, folder "06. RRQ and Rates WP.zip", as listed below:

Table	Table Title	Filename
6-2	2028-2033 CARE REVENUE REQUIREMENT TABLES FOR ELECTRIC AND GAS (WHOLE DOLLARS)	IQP_2028-2031_WP_PGE_20260109-Ch06-ESA CARE FERA RRQ.xlsx

Table	Table Title	Filename
6-3	ESTIMATED 2028-2033 CARE DISCOUNT FORECAST (WHOLE DOLLARS)	IQP_2028-2033_WP_PGE_20260109-Ch06-ESA CARE FERA RRQ.xlsx
6-4	ILLUSTRATIVE ELECTRIC REVENUE INCREASE AND CLASS AVERAGE RATES INCOME QUALIFIED PROGRAM: CARE ADMIN	IQP_2028-2033_WP_PGE_20260109-Ch06-CARE Electric Rate Impacts.xlsx
6-5	CLASS AVERAGE BUNDLED AND TRANSPORTATION/PPPS RATES (\$/TH)	IQP_2028-2033_WP_PGE_20260109-Ch06-IQP 2028 Gas Rate Impact Workpaper.xlsx
6-6	2028-2033 FERA PROGRAM ELECTRIC REVENUE REQUIREMENT (WHOLE DOLLARS)	IQP_2028-2031_WP_PGE_20260109-Ch06-ESA CARE FERA RRQ.xlsx
6-7	ESTIMATED 2028-2033 FERA DISCOUNT FORECAST (WHOLE DOLLARS)	IQP_2028-2031_WP_PGE_20260109-Ch06-ESA CARE FERA RRQ.xlsx
6-8	ILLUSTRATIVE ELECTRIC REVENUE INCREASE AND CLASS AVERAGE RATES INCOME QUALIFIED PROGRAM: FERA ADMIN	IQP_2028-2033_WP_PGE_20260109-Ch06-FERA Electric Rate Impacts.xlsx
6-9	2028-2033 ESA PROGRAM ELECTRIC REVENUE REQUIREMENT (WHOLE DOLLARS)	IQP_2028-2031_WP_PGE_20260109-Ch06-ESA CARE FERA RRQ.xlsx
6-10	PROPOSED PG&E ELECTRIC (51 PERCENT) AND GAS (49 PERCENT) SPLIT FOR 2028-2033 (WHOLE DOLLARS)	IQP_2028-2031_WP_PGE_20260109-Ch06-ESA CARE FERA RRQ.xlsx
6-11	ILLUSTRATIVE ELECTRIC REVENUE INCREASE AND CLASS AVERAGE RATES INCOME QUALIFIED PROGRAM: ESA PROGRAM	IQP_2028-2033_WP_PGE_20260109-Ch06-ESA Electric Rate Impacts.xlsx
6-12	CLASS AVERAGE BUNDLED AND TRANSPORTATION/PPPS RATES (\$/TH)	RRQ/Rates Workpaper Zip: IQP_2028-2033_WP_PGE_20260109-Ch06-IQP 2028 Gas Rate Impact Workpaper.xlsx

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

PG&E Data Request No.:	CalAdvocates_005-Q005
PG&E File Name:	IQPPY28-33_DR_CalAdvocates_005-Q005
Request Date:	June 29, 2026
Requester DR No.:	CalAdv-KH-PG&E-2026-02
Requesting Party:	Public Advocates Office
Requester:	Ke Hu
Date Sent:	July 10, 2026
PG&E Witness(es):	Jenny Wu

QUESTION 005

Please provide all data supporting PG&E's proposed annual labor escalation rate of 3.75 percent and annual non-labor escalation rate of 3 percent:

- a) Actual annual labor costs for the CARE Program in the past 5 years, broken down by labor category;
- b) The annual percentage change in labor costs for each category;
- c) All historical data, calculations, analyses, and workpapers demonstrate how the observed wage increases and contract price adjustments were used to derive the proposed escalation rates of 3.75 percent for labor and 3 percent for non-labor costs.

ANSWER 005

PG&E objects to the request as unduly burdensome as it requests all historical data, calculations, analyses, and workpapers to demonstrate how the observed wage increases and contract price adjustments were used to derive the proposed escalation rates of 3.75 percent for labor and 3 percent for non-labor costs. Subject to and without waiving this objection, as general matter, PG&E's responds as follows:

- a. PG&E's proposed annual labor escalation rate follows the 3.75% enterprise-wide annual labor escalation rate proposed in its 2027 General Rate Case (GRC). Please refer to 2027 GRC, A.25-05-009, Exhibit (PGE-8), Chapter 3, Labor Escalation section, pages 3-32 to 3-34, Table 3-6 'Proposed Wage Increases.'
- b. Please see subpart (a).
- c. Please see subpart (a) for questions concerning annual escalations for labor.

PG&E's proposed annual escalate rate of 3% for non-labor costs, which balances rate affordability and inflationary pressure, is below the price increases observed during the current program cycle and is in-line with the Commission's decision in the 2027 IQP Bridge Funding Proceeding.¹ Examples of observed general inflationary trends and specific costs increases are provided below.

The Consumer Price Index (CPI) published by the U.S. Bureau of Labor Statistics serves as a benchmark for overall prices changes in the economy. From 2021 through 2024, the annual CPI increase ranged from 2.8% to 6.3%, averaging 4.1% (Table 1).

Table 1: CPI Changes (2021-2024)

Year	CPI Annual	Change	% Change
2021	304.602	12.001	4.1%
2022	323.900	19.298	6.3%
2023	334.662	10.762	3.3%
2024	343.886	9.224	2.8%

Source: U.S. Bureau of Labor Statistics. (Series ID CWURS49BSA0).

One example of a specific price change is rising postage rates. In 2025, the costs for mailing CARE program materials increased by more than 3% when the United States Postal Services (USPS) implemented new rates across several mail classes (Table 2). Because postal mail remains an important channel for communicating program information with income-qualified customers, these price increases directly affect CARE program administration costs.

Table 2: Postage Rate Change by Mail Class (2025)

Rate	Old	New (July 13, 2025)	% Change
Presort	\$ 0.6122	\$ 0.6602	7.84%
Full Rate	\$ 0.69	\$ 0.78	13.04%
Marketing	\$ 0.4140	\$ 0.4662	12.61%

Similarly, higher prices were also observed in marketing and outreach activities during the current program cycle. For example, the effective cost per thousand impressions (eCPM),² which represents the cost to PG&E to deliver 1,000 paid media impressions, increased between 3% to 18% annually between 2021 and

¹ Decision 26-07-007 at p.17. The Commission states that "it is reasonable to utilize 2024 actual spend, plus application of three years of three percent escalation (an increase of 9.27 percent)" to determine the 2027 CARE administrative budget.

² eCPM is a metric for comparing media costs using the same "cost per 1,000 ad views" measure. When eCPM increases from one year to the next, it means an entity has to pay more to deliver the same amount of advertising exposure, even if the campaign goal or audience remains similar.

2025 (Table 3). These cost increases reflect ongoing upward cost pressures associated with reaching CARE customers.

Table 3: CARE Media eCPM (2021-2025)

Year	eCPM	% Change
2021	\$ 4.10	NA
2022	\$ 4.83	18%
2023	\$ 5.02	4%
2024	\$ 5.52	10%
2025	\$ 5.66	3%



Public Advocates Office
California Public Utilities Commission

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 San Francisco, CA 94102
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<http://publicadvocates.ca.gov>

Public Advocates Office Data Response
A.26-01-003 et al. Income Qualified Program

To:	PG&E • Amanda.Sweetman@pge.com; • Jennifer.ReyesLagunero@pge.com; • Mary.Kenaston@pge.com; • Katherine.Foley@pge.com.
Sender Name:	Peter Chau Pui-Wa Li-Couthouis Andy Zhang Ke Hu James Ahlstedt Stephen Castello
Data Request Sent Date:	September 18, 2026
PG&E Data Request No:	PGE_CalAdvocates002
Data Response Date:	October 2, 2026

Introduction

The Public Advocates Office at California Public Utilities Commission (Cal Advocates) hereby submits the following Responses and Objections to PG&E's Data Request. Each portion of each question of the data request is re-stated prior to Cal Advocates' response.

Reservation of Rights

1. These responses and objections are made without waiving or intending to waive, but to the contrary intending to preserve and preserving: (a) any objection as to the competency, relevancy, materiality, privilege, or admissibility as evidence, for any purpose, or any documents or information produced in response to the data requests; (b) the right to object on any ground to the use of documents or information produced in response to the data requests at any hearing, trial or other point during this action; (c) the right to object on any ground at any time to a demand for further responses to data requests; and (d) the right at any time to revise, correct, add to, supplement, or clarify any of the responses to objections contained herein.
2. Cal Advocates reserves the right to present further information and produce additional documents as a result of its ongoing efforts to respond to the data requests. Cal Advocates expressly reserves the right to rely, at any time, on subsequently discovered documents.

GENERAL OBJECTIONS

1. The documents, information, and responses supplied herein are for use in A.26-01-003, et al. consolidated proceeding and for no other purpose.
2. No response or objection made herein, or lack thereof, is an admission by Cal Advocates as to the existence or non-existence of any documents or information.
3. Cal Advocates objects to each data request to the extent it is outside the scope of this proceeding.
4. Cal Advocates objects to each data request to the extent they seek to impose duties and obligations on Cal Advocates greater than Cal Advocates' duties and obligations under the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC).
5. Cal Advocates objects to each data request as unduly burdensome to the extent that the requestor purports to require Cal Advocates to create, compile, analyze, compute, and/or summarize voluminous data or information that the requestor has the ability to create, compile, analyze, compute, and/or summarize by reviewing the documents, information, or data that Cal Advocates has produced or will produce.
6. Cal Advocates objects to each data request as overly broad and unduly burdensome to the

extent that they seek to elicit information that is neither relevant to the subject matter of this proceeding, nor reasonably calculated to lead to the discovery admissible evidence.

7. Cal Advocates objects to each data request to the extent that they call for disclosure of material which is subject to the attorney-client privilege or attorney work-product doctrine.
8. Cal Advocates incorporates by reference every general objection set forth above in each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request.
9. Nevertheless, and without waiving any of its objections, in the spirit of cooperation, Cal Advocates provides the following response.

Data Request Responses

Q1: Please refer to The Public Advocates Office's Opening Testimony on 2028-2033 Income-Qualified Assistance Programs, in which PAO recommends that "the Commission require utilities to negotiate ESA contracts with fixed costs for ESA measure delivery and materials without provisions for guaranteed markups."

a. Please provide a detailed definition "fixed cost contracts" in the context of this recommendation.

Cal Advocates response:

- Fixed-cost contracts refer to a contract structure where ESA measure installations are conducted by a subcontractor that is paid a fixed fee or incentive for all the costs associated with measure installation, on a per unit of measure basis. This fee would cover the entire cost of ensuring a complete and operational measure for the ESA customer.
- Where applicable, any necessary profit, labor, or other costs for subcontractors should be included in the fixed fee, rather than having each individual provision negotiated.

b. If the answer to subpart (a) does not include the following information, please also explain the following details:

i. What component(s) does PAO recommend to be "fixed."

Cal Advocates response:

Please refer to Cal Advocates' response in Question (1)(a), immediately above this answer.

ii. The recommended duration of "fixed cost" terms.

Cal Advocates response:

There should be no fixed duration for the fixed costs, and consequently no guaranteed cost escalation for ESA measure costs. A negotiated cost for an ESA measure should be fixed indefinitely, unless and until the contract expires or a contractor provides adequate justification to renegotiate pricing.

c. Please provide any contract structures, examples, studies, analyses, or other materials relied upon in developing this recommendation.

Cal Advocates response:

- Cal Advocates relies on confidential information provided during discovery, including contract structures and examples, for developing this recommendation.¹ Please refer to Cal Advocates testimony for the PG&E contract structures and examples that Cal Advocates examined for this recommendation.²

Q2: Please refer to the Public Advocates Office's Opening Testimony on 2028-2033 Income-Qualified Assistance Programs, in which Cal Advocates recommends that "the Commission require utilities to transition a subset of ESA measures to an instant-rebate marketplace delivery approach for measures that are easily accessible through online retail stores, easy to install, and cost less than the total material and labor costs billed to ratepayers."

Please provide all analyses, studies, workpapers, calculations, assumptions, or other supporting documentation relied upon in developing this recommendation, including any evaluation of:

a. The costs associated with establishing, administering, maintaining, auditing, administering, or otherwise operating the proposed instant-rebate marketplace.

Cal Advocates response:

- The analysis and supporting documentation regarding the costs of operating the instant-rebate marketplace relies on confidential information. Please refer to Cal Advocates testimony which refers to an existing example of an operating instant-rebate marketplace from Southern California Gas Company (SoCalGas).³
- Also, Cal Advocates relied on Final Enervee IMS NY Marketplace Report, attached to this Data Response. The study examines a marketplace program operated by Enervee, which is also the same contractor for SoCalGas's marketplace program.
- Cal Advocates also examined the SMUD Energy Store and the publicly available information on the website: <https://smudenergystore.com/>.

¹ San Diego Gas & Electric Company Response to Data Request No. CAL ADVOCATES-AZ-SDGE-2025-01; SoCalGas's Response to Data Request No. CAL ADVOCATES-AZ-SCG-2025-01; Southern California Edison Company's Response to Data Request No. CAL ADVOCATES-SCE-AZ-2025-02.

² Cal Advocates Opening Testimony at 3-13; Confidential Appendix E.

³ Cal Advocates Opening Testimony at 3-12.

b. The metrics used to select and grade the effectiveness of the proposed instant rebate model vs. any other model(s) considered. Please also list other models considered.

Cal Advocates response:

- As Cal Advocates stated in testimony, the existing ESA measure delivery costs and energy savings were compared to the potential costs of an instant-rebate marketplace.⁴
- The effectiveness of the current ESA measure delivery model was analyzed to determine effectiveness based on measure delivery costs when compared to market-rate costs.
- Cal Advocates also used confidential information from SoCalGas's existing marketplace program to examine the efficacy of an instant-rebate marketplace, including participation, incentive costs, website traffic, conversion rates, number of transactions, sales, and administrative costs.⁵

c. The criteria used to determine 'easy to install' and which, if any, stakeholders were consulted in crafting this criteria.

Cal Advocates response:

- Cal Advocates does not pre-determine all the criteria for measures that are "easy to install." Cal Advocates has not consulted other stakeholders in developing this criteria.
- However, as stated in Cal Advocates' Opening Testimony, Cal Advocates defines "easy to install" as measures that a customer can reasonably install themselves with minimal labor and expertise, such as standard screw-in lightbulbs and air purifiers.

d. Any data demonstrating potential success of the proposed instant rebate model, as defined as the ability to support the goals and objectives of the ESA portfolio.

Cal Advocates response:

- Please refer to Cal Advocates' answer to Q2, parts a and b.

e. Documentation of identification of potential or actual drawbacks to the proposed instant-rebate model, and if and how they may be mitigated or addressed.

Cal Advocates response:

- Please refer to Cal Advocates' answer to Q2 parts a and b.

end of Cal Advocates responses

⁴ Cal Advocates Opening Testimony at 3-7 to 3-9, 3-12.

⁵ The confidential information was provided as part of several sequential SoCalGas's monthly Procurement Review Group presentations, dated 4/7/2026 and 5/5/2026.

**ENERGY EFFICIENCY COUNCIL
RESPONSE TO PACIFIC GAS AND ELECTRIC COMPANY DATA REQUEST
PGE_EEC001, PGE_EEC002**

Proceeding: A.26-01-003, et al. - 2028-2033 Income Qualified Programs
Responding Party: Energy Efficiency Council (EEC)
Witness: Allan Rago
Data Request: PGE_EEC001, PGE_EEC002

Response Date: September 22, 2026

PG&E REQUEST 1

Regarding the testimony of the Energy Efficiency Council (EEC), submitted September 14, 2026 in the above-referenced proceeding:

Please provide electronic copies of all workpapers which support the testimony of:

TESTIMONY OF ALLAN RAGO ON THE PACIFIC GAS AND ELECTRIC COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY, SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA GAS COMPANY APPROVAL AND FUNDING FOR THEIR INCOME-QUALIFIED PROGRAMS (IQPS) PORTFOLIOS FOR 2028-2033.

All files should be presented in their native format with formulas and calculations enabled.

EEC RESPONSE TO REQUEST 1

EEC's testimony is based primarily upon the personal knowledge and experience of witness Allan Rago, information reported to him through his activities as President of EEC and his interactions with EEC member contractors, and publicly available documents identified and cited in the testimony.

EEC did not prepare spreadsheets, financial models, computer programs, calculations, or other separate analytical workpapers in support of its testimony. Accordingly, EEC has no such electronic workpapers to produce in response to this request.

To the extent EEC's testimony relies upon publicly available documents, EEC refers PG&E to the documents and specific references identified in the filed testimony, as listed below. These sources are publicly available Commission decisions, utility applications and testimony filed in this proceeding, an SCE advice letter, and the Commission's Energy Efficiency Policy Manual.

Certain portions of the testimony reflect Mr. Rago's personal knowledge and experience gained through more than 25 years of participation in California's low-income energy-efficiency programs. Other portions reflect information reported to Mr. Rago through his interactions with EEC member contractors. No separate workpapers were prepared for those observations or reports.

EEC has not created any new analyses, calculations, spreadsheets, or other documents for purposes of responding to this data request.

PUBLIC DOCUMENT REFERENCES IDENTIFIED IN FILED TESTIMONY

Footnote	Publicly Available Source Identified in Filed Testimony
1	PG&E Application at 12; SCE-02 at 127-131; Ex. SCG-01, Section 14.1, OV and RC-163 to OV and RC-166.
2	Ex. SCG-01, Section 14.1, OV and RC-163 to OV and RC-164.
3	Ex. SCG-01, Section 14.1, OV and RC-163.
4	Ex. SCG-02 at AS-12 to AS-13.
5	Ex. SCG-01, Section 14.1, OV and RC-164 to OV and RC-165.

6	SCG-01, Section 14.3.2, OV and RC-166.
7	D.08-11-031, Section 8, p. 75 et seq.; see also id., Summary ("LIEE Budgets Shall Promote Relevant Workforce Education and Training").
8	D.21-06-015 at 287.
9	SCE at 33, footnote 33.
10	PG&E at 4-121, footnote 195.
11	PG&E AppA-3, AppA-4.
12	SCG-01, Section 6.1.6, OV and RC-106 to OV and RC-107.
13	SCE Advice 5852-E (July 9, 2026), pp. 2-4.
14	Id. at p. 3.
15	PG&E Application at 12; SCG-01 at OV and RC-106 to OV and RC-108.
16	D.01-05-033 at 10.
17	PG&E Application, AppA-5 n.2; Energy Efficiency Policy Manual, Version 6.0 (Apr. 2020), Appendix C at 92-93 (Marketing and Outreach Costs); D.21-06-015, OP 112.
18	D.21-06-015, OP 177.
19	SCE-04 at 91.

PG&E REQUEST 2

EEC states that “EEC members have reported anecdotally that IOU-provided leads generate new program enrollments fewer than 10% of the time.” Please provide the basis for the “fewer than 10%” estimate, including any data, analysis, calculations, member reports, or other information supporting this assertion. Please also identify the IOU(s), program(s), and time period(s) to which this estimate applies.

EEC RESPONSE TO REQUEST 2

The statement that EEC members have reported anecdotally that IOU-provided leads generate new program enrollments fewer than 10 percent of the time is based on anecdotal information reported to Mr. Rago through his activities as President of EEC and his interactions with EEC member contractors participating in the ESA Program. The statement was intended to describe generally the reported effectiveness of IOU-provided leads in generating ESA Program enrollments and was not presented as an IOU-specific, contractor-specific, or time-period-specific statistical calculation.

EEC did not conduct a survey or statistical analysis and did not prepare or rely upon a spreadsheet, calculation, member report, database, or other separate document to derive the referenced percentage. Accordingly, EEC does not have an IOU-specific or time-period-specific calculation underlying the statement and has no data, calculations, member reports, or analytical workpapers responsive to this request to produce.

EEC understands that the IOUs maintain information regarding overall ESA Program enrollments and leads generated or provided through IOU marketing and outreach activities. EEC does not maintain the IOUs' underlying program data and therefore did not independently calculate the percentage from those records.

Response prepared on behalf of the Energy Efficiency Council.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q005
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q005Rev01
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	April 27, 2026 Rev01: July 17, 2026
PG&E Witness(es):	Jack Pilutti

SUBJECT: COST-EFFECTIVENESS

QUESTION 005

Please provide electronic versions of all supporting workpapers for the proposed plan, including benefit-cost analysis models.

ANSWER 005 REVISED 01

PG&E responds to this question following the clarification via email with TURN on April 15, 2026. As such, PG&E provides electronic versions of its cost-effectiveness workpapers that support benefit-cost analysis models in support of the 2028-2033 program cycle in the folder, titled, "IQPPY28-33_DR_TURN_001-Q005Rev01Atch01.zip."

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

PG&E Data Request No.:	CalAdvocates_002-Q001
PG&E File Name:	IQPPY28-33_DR_CalAdvocates_002-Q001
Request Date:	April 23, 2026
Requester DR No.:	002
Requesting Party:	Public Advocates Office
Requester:	Pui-Wa Li
Date Sent:	May 15, 2026

QUESTION 001

Referring to CalAdv-PWL-PGE-2026-01-Attach.xlsx, table Q1, please fill in the following tables regarding annual ESA surcharge collected from Your Company's California Alternate Rates for Energy (CARE) and non-CARE customers to recover the costs of Your Company's ESA pilots and programs in the program years (PY) indicated.

- a) Please fill in Table 1(a) below the amount of total ESA surcharge collected from Your Company's gas and electric customers through public purpose program (PPP) rates:

TABLE 1(A):
ANNUAL ESA SURCHARGE COLLECTED FROM YOUR COMPANY'S ALL CARE, NON-CARE, FERA, AND NON-INCOME-QUALIFIED RESIDENTIAL CUSTOMERS (I.E., GAS AND ELECTRIC BILLS COMBINED)

All Residential Customers	Annual (\$/year)	PY 2021	PY 2022	PY 2023	PY 2024	PY 2025
CARE	Median					
	Average					
Non-CARE	Median					
	Average					
FERA	Median					
	Average					
Non-CARE <u>and</u> Non-FERA (i.e., Non-Income-Qualified Customers)	Median					
	Average					

- b) Please fill in Table 1(b) below the amount of total ESA surcharge collected through electric PPP rates only:

**TABLE 1(B):
ANNUAL ESA SURCHARGE COLLECTED FROM YOUR COMPANY'S ELECTRIC CARE, NON-CARE, FERA, AND NON-INCOME-QUALIFIED RESIDENTIAL CUSTOMERS**

Electric Residential Customers	Annual (\$/year)	PY 2021	PY 2022	PY 2023	PY 2024	PY 2025
CARE	Median					
	Average					
Non-CARE	Median					
	Average					
FERA	Median					
	Average					
Non-CARE and Non-FERA (i.e., Non-Income-Qualified Customers)	Median					
	Average					

- c) Please fill in Table 1(c) below the amount of total ESA surcharge collected through gas PPP rates only:

**TABLE 1(C):
ANNUAL ESA SURCHARGE COLLECTED FROM YOUR COMPANY'S GAS CARE AND NON-CARE RESIDENTIAL CUSTOMERS**

Gas Residential Customers	Annual (\$/year)	PY 2021	PY 2022	PY 2023	PY 2024	PY 2025
CARE	Median					
	Average					
Non-CARE	Median					
	Average					

ANSWER 001

As requested in the Instructions of this Data Request, PG&E has also provided these figures in, "IQPPY28-33_DR_CalAdvocates_002-Q001Atch001.xlsx", Tab Q1.

**Table 1(a): Annual ESA Surcharge Collected from Your Company's
All CARE, Non-CARE, FERA, and Non-Income-Qualified Residential Customers
(i.e., Gas and Electric Bills Combined)**

Line No.

All Residential Customers		Annual (\$/year)	PY 2021	PY 2022	PY 2023	PY 2024	PY 2025
CARE	Median	\$ 12.96	\$ 21.17	\$ 28.47	\$ 30.06	\$ 32.53	
	Average	\$ 14.63	\$ 18.99	\$ 28.17	\$ 32.12	\$ 33.69	
Non-CARE	Median	\$ 9.42	\$ 20.88	\$ 25.71	\$ 24.68	\$ 27.98	
	Average	\$ 11.51	\$ 18.21	\$ 25.39	\$ 26.43	\$ 28.48	
FERA	Median	\$ 10.37	\$ 3.61	\$ 14.70	\$ 22.75	\$ 19.28	
	Average	\$ 12.42	\$ 4.12	\$ 16.25	\$ 24.99	\$ 21.49	
Non-CARE <u>and</u> Non-FERA (i.e., Non-Income-Qualified Customers)	Median	\$ 4.82	\$ 1.94	\$ 7.95	\$ 11.70	\$ 10.78	
	Average	\$ 7.76	\$ 2.65	\$ 10.68	\$ 15.94	\$ 14.53	

**Table 1(b): Annual ESA Surcharge Collected from Your Company's
Electric CARE, Non-CARE, FERA, and Non-Income-Qualified Residential Customers**

Electric Residential Customers	Annual (\$/year)	PY 2021	PY 2022	PY 2023	PY 2024	PY 2025
CARE	Median	\$ 8.24	\$ 2.84	\$ 11.14	\$ 17.08	\$ 15.59
	Average	\$ 10.75	\$ 3.50	\$ 13.78	\$ 21.40	\$ 19.57
Non-CARE	Median	\$ 4.82	\$ 1.94	\$ 7.95	\$ 11.70	\$ 10.78
	Average	\$ 7.76	\$ 2.65	\$ 10.68	\$ 15.94	\$ 14.53
FERA	Median	\$ 10.37	\$ 3.61	\$ 14.70	\$ 22.75	\$ 19.28
	Average	\$ 12.42	\$ 4.12	\$ 16.25	\$ 24.99	\$ 21.49
Non-CARE <u>and</u> Non-FERA (i.e., Non-Income-Qualified Customers)	Median	\$ 4.82	\$ 1.94	\$ 7.95	\$ 11.70	\$ 10.78
	Average	\$ 7.76	\$ 2.65	\$ 10.68	\$ 15.94	\$ 14.53

**Table 1(c): Annual ESA Surcharge Collected from Your Company's
Gas CARE and Non-CARE Residential Customers**

Gas Residential Customers	Annual (\$/year)	PY 2021	PY 2022	PY 2023	PY 2024	PY 2025
CARE	Median	\$4.72	\$18.33	\$17.33	\$12.98	\$16.94
	Average	\$3.88	\$15.49	\$14.39	\$10.72	\$14.12
Non-CARE	Median	\$4.60	\$18.94	\$17.76	\$12.98	\$17.20
	Average	\$3.75	\$15.56	\$14.71	\$10.49	\$13.95

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 5
REBUTTAL TESTIMONY ON
STUDIES AND EVALUATION, REPORTING,
WORKING GROUPS, AND CONCURRENT APPLICATION
SYSTEM

PACIFIC GAS AND ELECTRIC COMPANY
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PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 5
REBUTTAL TESTIMONY ON
STUDIES AND EVALUATION, REPORTING,
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A. Introduction [Witness: Iris Cheung]

This rebuttal testimony responds to the direct testimony of The Utility Reform Network (TURN), the Energy Efficiency Council (EEC), and the California Emerging Technology Fund (CETF), regarding Pacific Gas and Electric Company's (PG&E) Prepared Direct Testimony, and Supplemental Testimony I and II.¹

Party positions are summarized in Section B, while detailed party positions and PG&E's rebuttal are provided in the succeeding sections. Intervenors offer testimony regarding several cross-cutting Income Qualified Programs (IQP) topics, including processes for considering program modifications and study findings, working group oversight, customer communications, and the scope and implementation of the Concurrent Application System (CAS). PG&E addresses these issues below.

B. Summary of Party Positions

1. Summary of Party Positions

TURN, EEC, and CETF raise the following issues:

TURN:

- TURN recommends establishing a formal mid-cycle review process for considering potential IQP program modifications.²
- TURN recommends a formal process for considering and responding to findings from IQP-related studies and evaluations.³

¹ All references to PG&E exhibits are to the testimony served on January 9, 2026, and as updated in PG&E's June 30, 2026, errata (PG&E Exhibit-01E), as well as Supplemental Testimony I (PG&E-02) served on July 10, 2026 and Supplemental Testimony II (PG&E-03) served on August 10, 2026.

² TURN-04, p. 8, line 17 to p. 9, line 18.

³ TURN-04, p. 5, line 12 to p. 7, line 11.

EEC:

- EEC recommends an alternative oversight structure if the Energy Savings Assistance (ESA) Working Group (WG) were to discontinue, including potentially assigning an expanded oversight role to the Low-Income Oversight Board (LIOB) or the Energy Division (ED).⁴

CETF:

- CETF recommends expanded Investor-Owned Utility (IOU) communications to income-qualified customers regarding affordable broadband offerings, including recurring direct notifications.⁵
- CETF recommends including broadband programs as a limited enhancement to the CAS Phase I.⁶
- CETF recommends enhancements including a continuing policy, framework, listing standards, and functionality to support the ongoing participation and management of broadband programs in the CAS.⁷
- CETF recommends that the IOUs⁸ estimate and track the incremental costs and potential savings associated with including broadband programs in the CAS Phase I.⁹
- CETF recommends that the IOUs leverage existing CAS resources to support broadband program participation on the platform. For costs exceeding reasonable expenditures, CETF recommends that the IOUs seek external funding or additional California Public Utilities Commission (CPUC or Commission) authorization before proceeding.¹⁰
- CETF recommends that the IOUs submit a joint implementation plan for the CAS, developed in collaboration with stakeholders, including CETF,

⁴ EEC Testimony, p. 15, line 355 to p. 17, line 392.

⁵ CETF Investor Testimony, p. 16, lines 3-9.

⁶ CETF Intervenor Testimony, p. 21, lines 3-4.

⁷ CETF Intervenor Testimony, p. 19, line 26 to p. 22, line 14.

⁸ The IOUs are PG&E, San Diego Gas & Electric Company (SDG&E), Southern California Edison (SCE), and Southern California Gas Company (SoCalGas).

⁹ CETF Intervenor Testimony, p. 21, line 25 to p. 22, line 5.

¹⁰ CETF Intervenor Testimony, p. 21, line 25 to p. 22, line 4.

to the Energy Division and serve it on the service list within 90 days of the Commission's decision.¹¹

2. Uncontested Issues

No party offered testimony related to PG&E's proposals listed below:

Studies and Evaluations

- Proposals for the following studies and evaluations and their associated budgets:
 - 2031 and 2034 Low Income Needs Assessments (LINA);¹²
 - Impact Evaluations for the ESA Main and Multi-Family Whole Building programs;¹³
 - Non-Energy Benefits Study;¹⁴
 - Evolving Study and Data Needs;¹⁵
- Maintaining the ESA/CARE Study WG as adopted in Decision (D.) 21-06-015; and¹⁶
- Maintaining the existing fund shifting between program years for studies and evaluations as adopted in D.21-06-015.¹⁷

Reporting

- Maintaining the ability to submit a Tier 2 Advice Letter (AL) to propose using an online data management tool or dashboard to replace the need for spreadsheets and PDF reports;¹⁸ and
- As directed by the Commission, continuing Energy Division's work with the IOUs regarding the format and contents of monthly and annual reports, where it is not authorized by statute.¹⁹

¹¹ CETF Intervenor Testimony, p. 23, lines 6-12.

¹² Exhibit (PG&E-01E), p. 5-14, line 16 to p. 5-15, line 23.

¹³ Exhibit (PG&E-01E), p. 5-15, line 24 to p. 5-16, line 12.

¹⁴ Exhibit (PG&E-01E), p. 5-16, line 13 to p. 5-17, line 11.

¹⁵ Exhibit (PG&E-01E), p. 5-17, line 12 to p. 5-18, line 22.

¹⁶ Exhibit (PG&E-01E), p. 5-18, lines 23-30.

¹⁷ Exhibit (PG&E-01E), p. 5-19, lines 1-13.

¹⁸ *Ibid.*

¹⁹ *Ibid.*

Working Groups

- Continuing the role of the ESA Policy and Procedures and Installation Standards (PP&IS) Sub-Working Group (SWG) with a stand-alone WG focused on technical ESA issues, including measure updates (ESA Technical WG).²⁰

CAS

- Maintaining a two-way balancing account for cost recovery, if CAS Phase I were to continue beyond 2027.²¹

Cross Cutting Compliance Requirements

- Sunsetting a combined list of obsolete CARE, FERA, and ESA compliance items.²²

C. Mid-Cycle Process**1. PG&E Position**

PG&E proposes a mid-cycle Tier 2 AL to recommend adjustments and improvements to the IQP programs based on study and evaluation findings, and best practices and lessons learned from the initial two to three years of program implementation.²³

2. Party Position(s)**a. TURN**

TURN recommends the Commission adopt a formal mid-cycle review process for considering IQP modifications based on current and upcoming studies and evaluations, as well as other program and policy changes that may be warranted.²⁴

In TURN's response to PG&E's discovery request, TURN provides more details on what the process may entail. TURN recommends:

The Commission initiate the formal mid-cycle review process in 2029 Q3 by issuing an Assigned Commissioner's Ruling and Scoping Memo (ACR), setting a schedule for contemplating

²⁰ Exhibit (PG&E-01E), p. 5-32, line 5 to p. 5-33, line 4.

²¹ Exhibit (PG&E-01E), p. 5-36, line 17 to p. 5-37, line 17.

²² Exhibit (PG&E-01E), p. 5-39, lines 1-7.

²³ Exhibit (PG&E-01E), p. 5-24, line 7 to p. 5-25, line 4.

²⁴ TURN-04, p. 8, line 17 to p. 9, line 18.

potential changes in program goals, program designs, and program budgets for implementation in the second half of the program cycle.²⁵

TURN further elaborates that: (1) “the ACR would solicit comments on IQP changes in response to studies finalized since the decision adopting programs and budgets,”²⁶ (2) “solicit comments on IQP changes in response to changed circumstances, such as relevant changes in law, regulation, or public policy, or significant lessons learned,”²⁷ and (3) “solicit comments on IQP changes to improve coordination with other programs in California serving the same population served by ESA, as these programs and related policies evolve.”²⁸ Finally, TURN expects there would be “a final decision no later than the end of 2030 Q1 for implementation either in 2031, if the Commission adopts a 2028-2033 program cycle, or as soon as feasible with a shorter program cycle.”²⁹

3. PG&E Response

a. TURN

PG&E respectfully disagrees with TURN’s proposal to mandate a formal mid-cycle review via an ACR because it closely resembles a new application process. First, because this process would essentially be a brand-new application, it would divert critical administrative resources away from program delivery and generally duplicate the efforts from this current application.

Second, TURN’s recommendation overlooks the procedural safeguards already embedded in the AL process. A mid-cycle AL is already a formal and structured regulatory process, enabling a transparent and robust mechanism for stakeholder engagement. In the case of a Tier 2 AL, the Commission has a well-established process

²⁵ TURN’s response to PG&E Data Request PGE_TURN003-Q01, dated October 1, 2026 in Attachment A, at the end of this chapter.

²⁶ *Ibid.*

²⁷ *Ibid.*

²⁸ *Ibid.*

²⁹ *Ibid.*

where parties have a clear, formal right to submit protests, and utilities may also respond.³⁰ Should Energy Division determine that a Commission resolution is necessary, Energy Division can prepare a draft resolution for the Commission's consideration.³¹ The AL protest mechanism routinely accommodates detailed, technical, and data-driven feedback from stakeholders.

Creating an entirely new and separate formal review track would unnecessarily stall the implementation of real-time program updates. Furthermore, the flexibility required to adapt programs based on lessons learned and evaluation findings is best served by a streamlined process. The mid-cycle Tier 2 AL is designed to strike the proper balance: it maintains rigorous formal oversight while avoiding the litigious delays of a standalone proceeding track.

D. IQP Study Protocol

1. PG&E Position

PG&E did not submit a standalone proposal regarding a formal process for soliciting stakeholder feedback on finalized IQP studies. Instead, PG&E recommends leveraging its broader proposal for IQP Workshops³² to serve as the dedicated forum for this purpose. PG&E respectfully requests that the Commission utilize this integrated framework and reject TURN's proposal to issue formal rulings at the conclusion of every individual study.

2. Party Position(s)

a. TURN

TURN recommends:

the Commission adopt a process for soliciting reactions from the utilities and other stakeholders to each forthcoming IQP-related study currently underway or planned to be completed during the next program cycle. These studies include, but may not be limited to, the 2028 and 2031...LINA, which must be completed every three years. ESA 2021-2026 program cycle impact and process evaluations for all program components, and the biennial Potential

³⁰ CPUC General Order (GO) No. 96-B, General Rule 7.4 (2007).

³¹ GO No. 96-B, General Rules 7.6.2 & 8.2 (2007).

³² Exhibit (PG&E-01E), p. 5-29, line 10 to p. 5-32, line 4.

and Goals Studies, which include an estimate of energy efficiency potential from the ‘Income-Qualified’ sector and programs, including ESA.³³

In addition, TURN,

“specifically recommends that the Commission issue a ruling after each study is finalized that directs the utilities to file a summary of proposed actions based on findings and recommendations from the study, and that invites comments from parties on the utilities’ proposed actions. TURN recommends that this process take place through formal filings, rather than an informal compliance mechanism.³⁴

3. PG&E Response

- 1) Currently, the IOUs host two public workshops for every IQP study or evaluation – one during research initiation and another after draft findings become available.³⁵ The purpose of the second workshop is to solicit stakeholder feedback and comments and incorporate them into the final report as appropriate. It is important to note that all verbal and written comments captured at the workshops and during the commenting period are responded to. All comments and responses are posted on the CPUC Public Document Area (PDA).³⁶

In parallel, the ESA/CARE Study WG provides a collaborative, stakeholder-inclusive and consensus-based process towards managing the IOUs’ non-statutory ESA and CARE studies during the program cycle.³⁷ Select Study WG activities include providing input on proposed scopes, budgets, and timelines before they are finalized for study

³³ TURN-04, p. 6, lines 3-10.

³⁴ TURN-04, p. 6, line 11 to p. 7, line 1.

³⁵ A recent example was the 2025 LINA. Two workshops were hosted to present the draft research plan and draft evaluation report in April 2024, available at: <https://pda.energydataweb.com/#!/documents/3946/view> (accessed Oct. 13, 2026) and September 2025, available at: <https://pda.energydataweb.com/#!/documents/4219/view> (accessed Oct. 13, 2026).

³⁶ As an example, for the PG&E’s ESA Pilot Evaluation – Interim Findings Workshop, all verbal and written comments captured at the workshop and during the commenting period, along with corresponding responses, were posted on the CPUC PDA site. See “Workshop Q&A - Final.xlsx” available at: <https://pda.energydataweb.com/#!/documents/4301/view> (accessed Oct. 13, 2026).

³⁷ D.21-06-015, p. 410.

execution; participating in project kick-offs; offering feedback on project milestones and draft study results.³⁸ Per D.21-06-015, Study WG membership comprises of IOU representatives, Energy Division staff, and no more than two representatives from each segment of the following interest groups: contractors, CBOs, Cal Advocates, consumer protection/advocates, and other special interest groups.³⁹ TURN has been a core and active member of the Study WG throughout the current program cycle. In fact, TURN regularly proposes recommendations that PG&E considers for adoption.

In response to TURN's proposal, PG&E recommends using the proposed IQP Workshops as the dedicated forum for the IOUs to submit and present proposed actions based on findings and recommendations from IQP studies, and to gather additional stakeholder input before study findings are applied to program design and implementation.

- 2) PG&E respectfully requests that the Commission reject the requirement to issue a ruling after the finalization of every individual study. First, transparency and accountability can be more effectively achieved through the three-part framework described above:

- **Public Workshops (two per study/evaluation):** Utilizing the public workshop process already embedded in each IQP study or evaluation.
- **The ESA/CARE Study WG:** Continuing this dedicated WG into the next program cycle as proposed by the IOUs.⁴⁰
- **IQP Workshops:** Leveraging this public forum to openly discuss and finalize proposed action items.

Furthermore, TURN's proposal would result in potentially seven separate rulings, as demonstrated in their response to PG&E's data

³⁸ Due to the confidential nature of competitive solicitations, scoping contents presented to the Study WG are not publicly posted.

³⁹ D.21-06-015, p. 410.

⁴⁰ Exhibit (PG&E-01E), p. 5-18, lines 23-30.

request.⁴¹ This would create a continuous cycle of formal rulings and stakeholder filings, thus likely delaying PG&E's ability to swiftly implement program enhancements. Finally, third-party evaluation reports provide context-specific guidance rather than definitive actions that can be universally adopted. Evaluation recommendations must be synthesized against real-world operational realities, instead of being treated as automatic mandates. Imposing a formal ruling process at the conclusion of every study would likely compromise the flexible adaptation needed to ensure continuous program improvements.

E. ESA WG Oversight

1. PG&E Position

Consistent with its Prepared Direct Testimony and in coordination with the IOUs, PG&E proposes replacing the ESA WG with a workshop format to engage a broader range of stakeholders across all three IQPs (CARE, FERA, and ESA).⁴² Unlike the current ESA WG, formal membership would not be a prerequisite for participation. PG&E anticipates this format will reduce meeting frequency, diversify stakeholder engagement, and foster more productive dialogue. To support this, PG&E and the IOUs propose hosting these workshops on a rotational basis at least twice a year, providing a transparent forum to review program progress and discuss cross-cutting issues.⁴³

2. Party Position

a. EEC

The EEC claims that limited stakeholder input in the ESA WG process would lead to decisions being made behind closed doors.⁴⁴ Specifically, EEC cited SCE's Direct Prepared Testimony that "[e]ach

⁴¹ TURN's response to PG&E Data Request PGE_TURN003-Q01, dated 10/1/26 in Attachment A, at the end of this chapter (see table titled "Anticipated Timing of Certain Studies of Relevance to the IQPs").

⁴² Exhibit (PG&E-01E), p. 5-29, line 10 to p. 5-32, line 4.

⁴³ Exhibit (PG&E-01E), p. 5-29, line 10 to p. 5-32, line 4; SCE-04 p. 91, line 1 to p. 93, line 9; SCG-01 at p. OV and RC – 177 to p. OV and RC-181; SDG&E-01 at p. KO – 21, line 19 to p. KO – 22, line 7.

⁴⁴ EEC Testimony, p. 16, lines 363-364.

working group will convene as a closed session comprised exclusively of IOU subject matter experts”⁴⁵ and they (the specialized Working Groups) “retain the discretion to invite external stakeholders for targeted consultation.”⁴⁶ As a result, EEC recommends that “the Commission either grant the Low-Income Oversight Board (LIOB) the authority, consistent with the role originally envisioned for the ESA Working Group, to serve as the Program’s statewide ‘oversight’ body or provide such authority to the Energy Division Staff.”⁴⁷

3. PG&E Response

a. EEC

When the IQP Workshops were proposed to replace the existing ESA WG, PG&E and the other IOUs did not intend for them to be closed sessions. PG&E clarifies that, on the contrary, since membership is no longer a prerequisite for participation, the IQP Workshops format is specifically designed to invite diverse stakeholders from all three programs – ESA, CARE and FERA—and serve as a transparent, public forum for cross-cutting discussions. Similar to the current ESA WG format,⁴⁸ invitations for the IQP Workshops will be publicly noticed via the low-income service list in advance of the meetings, and presentation materials and meeting minutes will be posted on the CPUC PDA site after each meeting. It is important to note that the specialized working groups EEC referenced—such as the existing PP&IS SWG (which the IOUs propose to replace with a stand-alone ESA Technical WG) and the ESA/CARE Study WG—already consist of active stakeholder

⁴⁵ EEC Testimony, p. 16, lines 364-367.

⁴⁶ *Ibid.*

⁴⁷ EEC Testimony, p. 17, lines 389-392.

⁴⁸ As an example, for the August 27, 2026 ESA WG meeting, a public meeting notice was sent on August 12, 2026 by the representing IOU to Service Lists A.19-11-003/004/005/006/007 (cons.) and A.26-01-003/005/010/011 (cons.). Presentation materials and meeting minutes were posted on the CPUC PDA site available at: <https://pda.energydataweb.com/#!/documents/5376/view> (accessed Oct. 13, 2026).

memberships, which is fully consistent with the guiding principles of the
ESA working group structure.⁴⁹

F. Use of Income-Qualified Program Funding for Broadband Promotion **[Witness: Erik Olsen]**

1. PG&E Position

PG&E generally supports efforts to connect income-qualified customers with resources that may help them access essential services, including affordable broadband.⁵⁰ However, in the context of using energy ratepayer dollars (Public Purpose Program (PPP) funds) to fund such efforts, PG&E's position is that any co-marketing of affordable broadband to its IQP customers should have minimal effect on the budget.

2. CETF Position

CETF requests that the Commission approve, as part of the IQP Program budgets for the 2028-2033 Program Years, a significant expansion of the Joint Stipulation between CETF and the IOUs. This significant expansion adds a Direct Notification⁵¹ commitment to the parties' existing affordable broadband partnership and suggests using mail, text, and e-mail to promote affordable broadband offers, with a goal of achieving 99 percent of CARE customers online within 5 years.⁵² All other elements of the 2026 Bridge Funding Joint Stipulation will continue unchanged.⁵³

CETF proposes that utilities absorb the cost of affordable broadband marketing expenses, which may include list preparation, printing, mailing, and coordination in their Commission-approved IQP marketing, education,

⁴⁹ D.21-06-015 specifically requires that Study WG membership be comprised of IOU representatives, Energy Division staff, and no more than two representatives from each stakeholder interest group.

⁵⁰ 2027 Bridge Year – EXHIBIT A – AMENDED JOINT STIPULATION – 01: Affordable Internet Education and Outreach (Mar. 26, 2026), pp. 6-7.

⁵¹ CETF Intervenor Testimony – p. 16, lines 6-11.

⁵² CETF Intervenor Testimony, pp. 15, line 25 to p. 16, line 1.

⁵³ CETF Intervenor Testimony, p. 17, lines 1-3.

1 and outreach (ME&O) budgets.⁵⁴ CETF would continue to develop the
 2 materials and supply templates.⁵⁵

3 CETF also specifies the frequency of marketing and further proposes
 4 that Direct Notification by mail will occur no less than once a year. Direct
 5 Notification through other channels, including text and email, will occur no
 6 less than every six months, depending on each IOU's planned
 7 communications and mailed notifications will be stand-alone, visually distinct
 8 pieces a postcard or flyer with its own design and IVR number.

9 **3. PG&E Response**

10 It is inappropriate to increase use of PPP funds collected in energy utility
 11 rates to communicate on behalf of broadband telecommunications
 12 providers. Ratepayer-funds and IQP activities should not be converted into
 13 a general marketing channel for broadband telecommunications providers.

14 Expanding IQP-funded communications into broadband marketing
 15 would represent a material scope expansion beyond the CARE/ESA/FERA
 16 statutory purpose.⁵⁶ IOUs historically expressed limitations on using
 17 ratepayer funds for non-energy purposes confirming that program scope
 18 constraints exist and remain relevant.⁵⁷

19 CETF alleges that incorporating broadband messaging in the IOUs'
 20 marketing materials would not cost much and uses Program Year 2026 cost
 21 reporting and budget levels as an assumed proxy for future budgets and
 22 spending.⁵⁸ This is incorrect and fails to account for substantial impact to
 23 existing campaigns. If CETF's proposed approach to direct notifications was
 24 to be approved, then PG&E would be forced to divert approved funding from
 25 ME&O for CARE, FERA, and/or ESA and instead pay for affordable
 26 broadband marketing. PG&E's CARE, FERA, and ESA ME&O would be

⁵⁴ CETF Intervenor Testimony, p. 16, lines 17-20.

⁵⁵ CETF Intervenor Testimony, p. 16, lines 24-26.

⁵⁶ CARE: Pub. Util. Code § 739.1. FERA: Pub. Util. Code § 739.12. ESA: Pub. Util. Code § 2790.

⁵⁷ D.23-05-006, pp. 16-17, Sec. 5.1.1.

⁵⁸ CETF Intervenor Testimony, p. 8, line 25 to p. 9 line 7.

negatively impacted because this would essentially act as a budget reduction for those programs in future budget years.

In total and based on the proposal from CETF the impact to IQP budgets could be between \$70,000 and \$100,000 for non-energy-related campaigns in the first year, with additional maintenance costs in the following years.

Implementation costs would depend on the specific audience to be targeted and number of pieces. For example, the estimated cost to print and insert one standalone affordable broadband piece to a quantity of 20,000 CARE Welcome Kits is approximately \$12,000 per year (approx. \$0.60 per piece). Cost to add a standalone insert to a larger volume mailer might decrease on a per-piece basis for printing, but total cost would be dependent on manual vs. automated insertion and other factors.

PG&E estimates adding affordable broadband messaging to recurring email outreach, retention communications and Post-Enrollment Verification emails could cost roughly \$10,000 to \$20,000 for PG&E labor and third-party agency time for each distinct campaign. Most of these campaigns are automated, so edits would require removing campaigns from automation, updating content to add affordable broadband messages, and then reprogramming, testing, and restarting deployment. Based on recent PG&E projects, and assuming a simple design template, creating a standalone email for incremental “direct notification” could also cost at least \$20,000 for PG&E labor, translation fees, and third-party agency programming and deployment costs are approximately \$5,000 per e-mail.

In summary, CETF’s proposal is unreasonable because it would incur significant costs and labor that would have a detrimental impact on PG&E’s income-qualified customers and PG&E’s ME&O for CARE, FERA and ESA programs.

a. CETF Mischaracterizes PG&E’s CARE Customer Email Data

CETF’s characterization of PG&E’s 2024 figure is incorrect. CETF’s testimony reports 213,000 email addresses on file⁵⁹ as if that figure represented the complete CARE population, then describes the resulting

⁵⁹ CETF Intervenor Testimony, p. 7, Table 2 line 8.

1 15.5 percent as PG&E's "reachable share."⁶⁰ PG&E requested
 2 clarification of these figures and their source through propounding
 3 discovery.⁶¹ As of October 13, PG&E had not received a response from
 4 CETF.

5 PG&E has previously provided the true number of CARE customers
 6 with email on file: "[A]s of November 21, 2025, PG&E has 1,380,224
 7 customers enrolled in CARE. Of these customers, 1,142,572 or
 8 approximately 83 percent of CARE enrolled customers have an e-mail
 9 address on file with PG&E."⁶² Thus, as of November 21, 2025, PG&E
 10 estimates that approximately 238,000 CARE customers do not have
 11 email addresses on file with PG&E.

12 According to CETF, "[T]he customer having an email address is a
 13 reasonable if rough proxy for a household's connection to the
 14 Internet."⁶³ Notwithstanding the inaccurate understatement of the
 15 number of PG&E customers with email on file, PG&E believes this is a
 16 flawed proxy for home internet service. Customer email-on-file counts
 17 only show whether *PG&E* possesses an email address in its customer
 18 records. There may be different reasons why a CARE customer
 19 chooses not to provide an email address. A customer may also simply
 20 choose not to provide an email address. CETF's leap from an
 21 incomplete administrative contact field (CARE customer email on file) to
 22 a statement that a "very large share of CARE households still cannot be
 23 shown to have basic Internet connectivity at home"⁶⁴ is a flawed
 24 statement and should be rejected.

⁶⁰ CETF Intervenor Testimony, p. 7, lines 24-25.

⁶¹ On September 18, 2026, PG&E propounded a discovery request on CETF seeking a response on an accelerated schedule on or before September 25, 2026. CETF requested, and PG&E granted, an extension until October 9, 2026. As of October 13, PG&E had not received a response from CETF.

⁶² A.25-06-024, ME&O Rebuttal Testimony of Erik Olsen, p. 1-4, lines 21-23.

⁶³ CETF Intervenor Testimony – p. 6, lines 5-6.

⁶⁴ CETF Intervenor Testimony, p. 8, lines 8-9.

b. CETF's Direct Notification Proposal Is Unworkable

CETF's proposal would expand PPP-funded communications beyond the core CARE, ESA, and FERA purposes into promotion of third-party broadband offerings. That expansion entails more than marginal printing costs: it requires legal and regulatory review, vendor and production coordination, customer-data governance, operational prioritization, and management of competing outreach demands. Given there is no incremental budget for these activities, ME&O funding approved as part of the 2028-2033 program cycle would need to be redirected from CARE, FERA, and/or ESA ME&O to instead pay for marketing of affordable broadband services. Leading industry practices as well as PG&E marketing experience reinforce that competing messages and offers may dilute response rates. The priority of these communications should remain CARE, FERA, and ESA acquisition and retention.

While PG&E strategically integrates complementary programs and services where possible, parties should not assume that new broadband communications can be added without tradeoffs or displacement of program messaging including Medical Baseline, Relief for Energy Assistance Through Community Help (REACH), and safety or service-related notifications. The Commission should continue to prioritize these essential programs rather than distract with third party marketing of broadband services.

c. CETF's Proposal Is a Recurring Third-Party Broadband Marketing Campaign, Not a Routine IQP or Energy-Related Communication

CETF would require the IOUs to send stand-alone broadband notifications by email and text at least every six months, identify the IOU as the sender, and direct customers to CETF's call center.⁶⁵ PG&E's customer contact information is collected primarily to provide regulated energy service, administer CARE/ESA/FERA, deliver billing and safety notices, and meet regulatory obligations, not to promote third-party programs. Using that information for repeated marketing of broadband

⁶⁵ CETF Intervenor Testimony, p. 16, lines 3-9.

offers would raise material privacy, consent, and compliance concerns under the California Consumer Privacy Act,⁶⁶ Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003,⁶⁷ and other applicable electronic-communications requirements. The proposal provides no evidence that customers authorized this use of their email addresses or mobile numbers, nor does it establish who would bear compliance responsibility for consent, opt-outs, disclosures, suppression lists, and complaints.

The problem is especially acute because CETF's proposal is not limited to a single informational notice. It calls for multi-channel, repeated communications, including mail, email, and text.⁶⁸ The Commission should reject CETF's proposal because it is a recurring third-party broadband marketing campaign, not a routine IQP or energy-related communication.

G. CAS Phase I [Witness: Iris Cheung]

1. PG&E Position

PG&E is not proposing additional Phase I CAS enhancements because the Commission-approved Phase I scope of work already includes all feasible recommendations from the CAS Working Group and Energy Division.⁶⁹ CAS Phase II recommendations fall outside the scope of this CARE, FERA, and ESA proceeding because the CAS Phase II is intended to involve broader industries and utilities and therefore should be deferred to future CAS II proceeding as directed by the Commission in D.23-05-006.⁷⁰ Considering Phase II recommendations exceeds the scope of this proceeding, undermines the Commission's separation of Phase I and Phase

⁶⁶ California Consumer Privacy Act of 2018, effective 01/01/2025, available at: https://coppa.ca.gov/regulations/pdf/ccpa_statute.pdf (accessed Oct. 12, 2026).

⁶⁷ Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003 (CAN-SPAM Act), available at: <https://www.ftc.gov/legal-library/browse/statutes/controlling-assault-non-solicited-pornography-marketing-act-2003-can-spam-act> (accessed Oct. 12, 2026).

⁶⁸ CETF Intervenor Testimony, p. 14, lines 13-14.

⁶⁹ Exhibit (PG&E-01E), p. 5-36, lines 17-23.

⁷⁰ D.23-05-006, p. 9, pp. 13-14, Conclusion of Law 2 (p. 29).

1 II activities, and risks assigning non-energy program costs to energy
2 ratepayers.⁷¹

3 **2. CETF**

4 CETF is the only party who submitted intervenor testimony regarding the
5 CAS. CETF provides several recommendations for enhancements, costs,
6 and implementation of the CAS Phase I platform. These recommendations
7 include:

8 Enhancements

- 9 • A continuing framework for the CAS to display and refer customers to
10 both energy and non-energy assistance programs, including California
11 LifeLine and affordable home broadband programs for low-income
12 households.⁷²
- 13 • A standing CAS policy that includes affordable broadband offers and
14 continues across program cycles.⁷³
- 15 • Establishing clear, neutral criteria and processes for listing and updating
16 low-income assistance programs and broadband offers in the CAS, as
17 well as allowing CETF to propose updates to those listings.⁷⁴
- 18 • Enhancing the CAS information and referral functions for non-energy
19 assistance programs, while requiring separate Commission approval for
20 any broader enrollment integration or expenditures beyond existing
21 authority.⁷⁵

22 Costs

- 23 • Requiring the IOUs to estimate the incremental costs and potential
24 savings associated with including broadband offers in CAS.⁷⁶
- 25 • Leveraging existing functionality and external information to support the
26 inclusion of broadband programs, where feasible, to minimize energy

71 Exhibit (PG&E-02) p. 28, line 20 to p. 29, line 4.

72 CETF Intervenor Testimony, p. 19.

73 CETF Intervenor Testimony, p. 19, line 26 to p. 20, line 2.

74 CETF Intervenor Testimony, p. 20, line 16 to p. 21, line 2.

75 CETF Intervenor Testimony, p. 21, lines 3-7.

76 CETF Intervenor Testimony, p. 21, line 25 to p. 22, line 5.

ratepayer-funded expenditures within the Commission-authorized budgets.⁷⁷

- Requiring the IOUs to track incremental costs and obtain external funding or separate Commission authorization before incurring costs exceeding existing budget authority.⁷⁸

Implementation

- Establishing information requirements and presentation standards for broadband programs presented to consumers through the CAS.⁷⁹
- Including data on aggregate use, referral, CARE customers, enrollments, and incremental costs in CAS reporting.⁸⁰
- Requiring the CAS to provide ongoing information and referral services for non-energy assistance programs, including California LifeLine and affordable broadband programs for low-income households.⁸¹
- Requiring the IOUs to jointly develop an implementation plan, in consultation with stakeholders, including CETF, and submit the plan to Energy Division and serve it on the service list within 90 days of a final Commission decision.⁸² The implementation plan should establish listing criteria, governance responsibilities, update procedures, costs, funding, and implementation timelines; prioritize use of existing CAS functionality; create a process for maintaining broadband and telecommunications listings; and expand CAS reporting on usage, referrals, enrollments, and costs.⁸³

3. PG&E Response

CETF's recommendations to include non-energy programs, such as broadband, as enhancements to the CAS Phase I are inconsistent with the Commission's directives for the CAS Phase I, exceed the approved work

⁷⁷ CETF Intervenor Testimony, p. 21, line 25 to p. 22, line 5.

⁷⁸ CETF Intervenor Testimony, p. 21, line 25 to p. 22, line 5.

⁷⁹ CETF Intervenor Testimony, p. 21, lines 22-23.

⁸⁰ CETF Intervenor Testimony, p. 22, lines 16-19.

⁸¹ CETF Intervenor Testimony, p. 22, line 23 to p. 23, line 5.

⁸² CETF Intervenor Testimony, p. 23, lines 6-7.

⁸³ CETF Intervenor Testimony, p. 23, lines 22-25.

1 scope for the CAS Phase I, and risk improper allocation of energy ratepayer
2 funds.

3 First, including broadband programs in CAS Phase I is inconsistent with
4 the Commission's phased approach to CAS implementation because it
5 expands the scope of Phase I beyond the energy sector. In D.23-05-006,
6 the Commission specifically limits Phase I to focus on the integration of the
7 IOUs' CARE, FERA, and ESA programs,⁸⁴ while designating Phase II to
8 evaluate the integration of other low-income energy programs and the
9 potential inclusion of non-energy programs.⁸⁵ Accordingly, CETF's
10 recommendation to include broadband programs in the CAS Phase I
11 exceeds the scope established by the Commission. Consistent with this
12 position, PG&E cautions against conflating Phase I implementation activities
13 with Phase II policy considerations, as discussed in its Supplemental
14 Testimony I.⁸⁶

15 Second, contrary to CETF's characterization, expanding CAS to include
16 broadband programs is not "a limited enhancement to [existing]
17 CAS...functions."⁸⁷ While CETF's recommendations regarding a standing
18 CAS policy and framework, listing criteria and presentation standards and
19 update procedures for broadband programs may provide administrative
20 efficiencies for CETF,⁸⁸ they would introduce new system policies and
21 process flows specific to broadband programs that do not currently exist
22 within the CAS Phase I. As a result, implementing these recommendations
23 would require work that exceeds the scope and budgets approved by the
24 Commission for the CAS Phase I development and implementation.⁸⁹

25 Third, CETF's recommendations highlight unresolved questions about
26 cost responsibility for the CAS that PG&E has repeatedly raised in its

⁸⁴ D.23-05-006, p. 12.

⁸⁵ D.23-05-006, pp. 13-14.

⁸⁶ Exhibit (PG&E-02), p. 29, lines 10-13.

⁸⁷ CETF Intervenor Testimony, p. 21, line 3.

⁸⁸ CETF Intervenor Testimony, p. 19, line 26 to p. 20, line 6.

⁸⁹ Resolution E-5394; PG&E AL 4994-G/7422-E.

1 Prepared Direct Testimony⁹⁰ and Supplemental Testimony I.⁹¹ While
 2 CETF states it is “not proposing that energy customers finance a higher cost
 3 due to inclusion of broadband offers in the cross-sector platform,”⁹² it also
 4 recommends leveraging existing CAS functionality developed using energy
 5 ratepayer funds.⁹³ Additionally, CETF recommends that the IOUs estimate
 6 and track costs and potential savings associated with the inclusion of
 7 broadband programs and seek external fundings or additional funding
 8 allocation from the Commission for costs beyond the approved budgets for
 9 the CAS Phase I development and implementation.⁹⁴ Similar to PG&E’s
 10 arguments in Section F above, CETF’s recommendations would be an
 11 inappropriate cost allocation of energy ratepayer funds for non-energy
 12 programs. There would also be a lack of an equitable framework for
 13 allocation and covering costs across all other participating sectors. Because
 14 these concerns pertain to Phase II and are beyond the scope of the current
 15 IQP proceeding, PG&E maintains that costs associated with “other
 16 industries and utilities” should not be funded through energy ratepayer
 17 funds.

18 Lastly, with respect to CETF’s proposal regarding a CAS implementation
 19 plan, PG&E notes that the Commission has already approved the CAS
 20 Phase I implementation plan.⁹⁵ However, if CETF is requesting a CAS
 21 Phase II implementation plan, then as mentioned above, the Commission
 22 has not initiated the proceeding for CAS Phase II. Setting a CAS Phase II
 23 Implementation Plan before the Commission has initiated a proceeding with
 24 all interested stakeholders and issuing a final decision regarding cost
 25 recovery, is premature.

90 Exhibit (PG&E-01E) p. 5-38, lines 12-26.

91 Exhibit (PG&E-02), p. 29, lines 14-26.

92 CETF Intervenor Testimony, p. 22, lines 4-5.

93 CETF Intervenor Testimony, p. 21, line 25 to p. 22, line 2.

94 CETF Intervenor Testimony, p. 21, line 25 to p. 22, line 5.

95 PG&E AL 4994-G/7422-E; see also Res. E-5394. See also Exhibit (PG&E-02), pp. 31-32.

1 For the reasons discussed above, PG&E recommends that the
2 Commission reject CETF's recommendation to incorporate CETF's
3 recommendations for CAS Phases I and II.

4 **H. Conclusion**

5 For the reasons discussed above, PG&E recommends that the Commission
6 approve PG&E's proposals regarding the cross-cutting IQP topics addressed in
7 this chapter, including:

- 8 • The mid-cycle process;
- 9 • Studies and evaluations;
- 10 • Working group oversight;
- 11 • Customer communications; and
- 12 • CAS Phase I.

13 PG&E respectfully requests the Commission decline additional requirements
14 that are unnecessary, duplicative, or outside the scope of this proceeding.

PACIFIC GAS AND ELECTRIC COMPANY
CHAPTER 5
ATTACHMENT A
STUDIES AND EVALUATION, REPORTING, WORKING GROUPS
AND CONCURRENT APPLICATION SYSTEM

PACIFIC GAS AND ELECTRIC COMPANY
2028-2033 Income Qualified Programs
Application 26-01-003
Data Request

To:	The Utility Reform Network (TURN)
Recipient Name:	Jennifer Kellay Sylvie Ashford Julia De Lamare Hayley Goodson Reina Yanagiba
Request Date:	September 24, 2026
PG&E Data Request No:	PGE_TURN003
PG&E File Name:	IQPPY28-33_DR_PGE_TURN003
Due Date:	October 1, 2026
Response Date:	October 1, 2026

Please acknowledge receipt of this discovery request via email. PG&E further requests that TURN provide responses on an expedited schedule on or before October 1, 2026, or otherwise as soon as possible.

Please provide an electronic response to this Discovery Request to the following recipients:

- Amanda.Sweetman@pge.com;
- Jennifer.ReyesLagunero@pge.com;
- Mary.Kenaston@pge.com;
- Katherine.Foley@pge.com.

Hard copy responses are unnecessary. The responses should be sent as e-mail attachments to the recipients above. If the files are too large to e-mail, please notify the recipients above and contact Katherine Foley (Katherine.Foley@pge.com) to upload the documents into a folder on the Electronic Secure File Transfer (ESFT).

When available, provide documents in their original electronic format and leaving all formulas intact. Each page of the responses should be numbered, referenced, and indexed so worksheets can be followed. If any of your responses references or reflects calculations, provide a copy of the electronic files, including Excel spreadsheets or computer programs, that were used to derive such calculations in order to enable PG&E to review the underlying formulas and data sources.

SUBJECT: TURN OPENING TESTIMONY

Q 1: Regarding the testimony of the The Utility Reform Network (TURN), submitted September 14, 2026 in the above-referenced proceeding:

On pages 8-9 of TURN's Cross-Cutting Procedural Issues testimony, TURN recommends that the Commission establish a "formal mid-cycle review process" to consider potential IQP officiations based on emerging study results, changes in the policy landscape, and other circumstances.¹ Please describe in detail TURN's proposed formal mid-cycle review process, including:

- a. The anticipated timing, procedural framework, opportunities for party participation and record development, and process for Commission consideration and approval of any resulting IQP modifications.

Q01 Response:

In TURN-04, TURN recommends two types of processes related to IQP adjustments during the upcoming program cycle. First, TURN recommends that the Commission solicit reactions to studies that emerge by issuing a ruling after each study is finalized. The ruling should direct the utilities to file a summary of proposed actions based on findings and recommendations from the study and invite other parties to file comments on the utilities' proposed actions. (TURN-04, p. 6). Second, TURN recommends a formal mid-cycle review process, as this question references. Although TURN did not provide the level of detail solicited in this question in its testimony, TURN welcomes the opportunity to share additional specifics regarding this proposal and seek alignment if possible with other stakeholders.

Based on the timing of forthcoming studies with relevance to the IQPs (shown below), TURN recommends that the Commission initiate the formal mid-cycle review process in 2029 Q3 by issuing an Assigned Commissioner's Ruling and Scoping Memo (ACR), setting a schedule for contemplating potential changes in program goals, program designs, and program budgets for implementation in the second half of the program cycle. The ACR would solicit comments on IQP changes in response to studies finalized since the decision adopting programs and budgets, such as ESA impact and process evaluations, the 2028 Low Income Needs Assessment, and the 2029 Potential & Goals Study, the results of which are anticipated on the timelines shown below. Likewise, the next triennial CHANGES program evaluation, anticipated in 2028, may yield actionable recommendations to consider. The ACR would also solicit comments on IQP changes in response to changed circumstances, such as relevant changes in law, regulation, or public policy, or significant lessons learned. Finally, the ACR would solicit comments on IQP changes to improve coordination with other programs in California serving the same population served by ESA, as these programs and related policies evolve.

¹ TURN-04, Prepared Testimony of Hayley Goodson Addressing Cross-Cutting Procedural Issues Impacting The Income-Qualified Programs, pp. 8-9, September 14, 2026.

Anticipated Timing of Certain Studies of Relevance to the IQPs

	2026	2027	2028	2029	2030	2031
ESA Main Impact and Process Eval ²		Q4				
ESA MFWB Impact and Process Eval ³			Q4			
ESA Pilot Plus/Pilot Deep ⁴			Q4			
SCE Building Electrification Pilot ⁵		Q2				
SCE Whole Home Pilot ⁶	Q4					
2028 LINA ⁷			Q4			
2029 P&G Study ⁸				Q2		

TURN proposes that the ACR set a deadline for opening comments from all parties of 30 days from the issuance of the ACR, with concurrent reply comments due 30 days later. TURN anticipates that the utilities would have already had an opportunity to address recommendations in studies finalized in 2026-2028, so these ACR comments would focus on consolidated IQP changes not already implemented earlier in the program cycle or that require a Commission decision for implementation.

Following the Mid-Cycle opening and reply comments, the ALJ would hold a status conference to discuss the need for additional procedural steps before the preparation of a proposed decision addressing mid-cycle IQP changes. The extent and nature of any additional procedural steps would depend upon the IQP changes under consideration and state of the record. The expectation would be a final decision no later than the end of 2030 Q1 for implementation either in 2031, if the Commission adopts a 2028-2033 program cycle, or as soon as feasible with a shorter program cycle. A possible schedule for these procedural events is summarized below (with illustrative dates adjusted to align with business days).

² TURN-04, p. 6, fn. 11 and Appendix B.

³ TURN-04, p. 6, fn. 11 and Appendix B.

⁴ TURN-04, p. 6, fn. 11 and Appendix B.

⁵ SCE ESA Pilots Public Workshop, June 2026, BE Pilot Project-Midpoint Eval Findings, Slide 39, <https://pda.energydataweb.com/#!/documents/5334/view>

⁶ SCE ESA Pilots Public Workshop, June 2026, Whole Home Pilot, Slide 26, <https://pda.energydataweb.com/#!/documents/5334/view>

⁷ LINA Study Team Presentation to LIOB, 3/10/26, Slide 13, <https://pda.energydataweb.com/api/downloads/4285/2028%20LINA%20Presentation%20to%20LIOB%202026-03-06.pdf>; 2028 LINA Draft Work Scope Presentation to LIOB, 5/5/26, Slide 14, <https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2026/04/Item-4-LINA-Presentation.pdf>

⁸ See TURN-04, p. 9; TURN-01, pp. 39-40.

Illustrative Mid-Cycle Review Schedule

Mid-Cycle Review Event	Timing	Illustrative Dates
Mid-Cycle ACR	2029 Q3	7/9/29
All Party Comments	2029 Q3 [ACR +30 days]	8/8/29
Reply Comments	2029 Q3 [ACR +60 days]	9/7/29
Status Conference	2029 Q3 [ACR +75 days]	9/24/29
Proposed Decision	2030 Q1 [ACR + 180 days]	1/7/30
Final Decision	2030 Q1	