

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

ENERGY DIVISION

RESOLUTION E-4381  
January 27, 2011

**R E S O L U T I O N**

Resolution E-4381. Pacific Gas and Electric Company requests approval of its proposed metrics for its Peak Day Pricing and Time-of-Use customer education and outreach activities for non-residential customers.

PROPOSED OUTCOME: This Resolution approves with modifications PG&E's proposed metrics.

ESTIMATED COST: None

By Advice Letter 3693-E filed on June 25, 2010.

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**SUMMARY**

This Resolution approves with modifications Pacific Gas and Electric Company's (PG&E) proposed performance metrics for its Time-of-Use (TOU) and Peak Day Pricing (PDP) outreach and education plan.

PG&E proposes metrics that quantify and measure PG&E's outreach and education activities for the new TOU and Peak Day Pricing Rates that are being introduced over the next two years to all non-residential customer classes. PG&E's proposed metrics emphasize the utility's efforts to reach customers and do not adequately measure customer understanding of the new rates. The proposed metrics will not provide adequate information to enable PG&E, the Commission or other parties to determine if PG&E's outreach efforts are preparing customers for the new rates. The Commission directs PG&E to eliminate some metrics that focus on the utility's efforts and further directs PG&E to add several metrics that measure customer understanding of the new rates. PG&E is also directed to adjust its reporting schedule so that results can inform its outreach and education in a timely manner.

## **BACKGROUND**

Time-differentiated rates are designed to mirror the variation in the cost of energy and will therefore vary by time of day. A Time-of-Use (TOU) rate divides the day into time periods and charges a different rate for each period, with the highest rate charged during “peak” hours when demand is highest, but is offset by low rates during off peak periods (evenings and early morning hours). TOU rates do not vary by the day.<sup>1</sup> Peak Day Pricing (PDP) is a critical peak pricing rate that includes two components: a TOU rate and a peak pricing signal. On most days of the year PDP customers will operate as usual on their TOU rate. However, on days when electricity demand is expected to be exceptionally high, the utility will declare a peak event day which triggers a very high energy charge for the peak period. PDP customers are given a day-ahead notice of a peak event day and are advised to shift their usage away from the peak period to avoid the high energy charge. TOU rates and peak charges are different for each customer class. All non-residential customers under 200kW will be defaulted on to TOU or PDP after they have 12 months of smart meter data.

Time-differentiated and dynamic rates are an integral part of the Commission’s demand response policy in that they provide customers a price signal that electricity generation during periods of high demand is more expensive than other times of the day. That price signal acts as an incentive for customers to lower their demand during peak hours. The aggregate response by customers to reduce or shift their demand away from peak periods lessens the utility’s need to rely on less efficient peaker plants that also have higher greenhouse gas emissions.

On February 25, 2010 the Commission issued D.10-02-032, which approved default TOU for PG&E’s small agricultural customers (Small Ag) and small and medium business customers (SMB). This rate will replace their otherwise applicable rate (OAR). Small Ag service agreements will default to TOU starting on February 1, 2012.<sup>2</sup> 450,000 SMB service agreements will change to a TOU rate starting on November 1, 2011.

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<sup>1</sup> Some TOU rates can vary by season.

<sup>2</sup> D.10-02-032 ordered PG&E to default small agricultural customers to TOU by February 1, 2011. On November 8, 2010, the Commission’s Executive Director extended the

*Footnote continued on next page*

D.10-02-032 also approved default PDP rates for large commercial and industrial customers (Large C&I), large agricultural customers (Large Ag), and SMB. Each group has a different default date at which time customers will be defaulted onto PDP. Customers defaulting to the PDP rate may choose to opt off the rate and go back to their OAR before the default date or at any time after they default. Customers have bill protection throughout their first year on the PDP rate, meaning that if their monthly bill under PDP is higher in comparison to their bill under their OAR, they can opt off PDP at any time and be provided a credit for the difference in the following month. Additionally, if they opt out of PDP at the end of the first year, and their PDP bills during the 12 months on the rate were in aggregate higher than what their bills would have been under their OAR (in aggregate), they will receive a credit for the difference. Large C&I customers were defaulted onto PDP on May 1, 2010. Large Ag customers will default to PDP on February 1, 2011 and SMB customers will default to PDP on November 1, 2011.

D.10-02-032 also approved \$ 30.78 million for PG&E's outreach and education activities that are intended to prepare customers for the new rates. Ordering Paragraph 12 requires PG&E to submit an outreach plan 60 days after the decision. The purpose of the plan is to describe customer education goals and the activities that PG&E will implement to achieve the goals. The decision also directed PG&E to receive comments and feedback from interveners on the plan and gave PG&E the option to revise the plan based on comments.<sup>3</sup> Ordering Paragraph 12 also gives authority to the Energy Division Director to direct the utility to make additions to the plan if necessary.

Ordering Paragraph 15 directs the utility to file an Advice Letter 120 days after the decision that includes a proposed timeline to develop customer surveys, a description of the information the utility will gather, and specific performance measurements for each of its customer classes. PG&E and the Commission will

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implementation date for default TOU for small agricultural customers to February 1, 2012. The Executive Director also extended the implementation date for optional Peak Day Pricing for residential customers from February 1, 2011 to November 1, 2011.

<sup>3</sup> PG&E did not receive any input from stakeholders about the plan.

use the performance measurements to determine if its outreach and education campaign is preparing customers for the new rates, and to identify adjustments that PG&E can make to its campaign.

PG&E complied with the decision by submitting an Outreach Plan on April 26, 2010 and AL 3693-E on June 25, 2010. As directed, PG&E included the April 26<sup>th</sup> Outreach Plan in AL 3693-E. In the Plan, PG&E defines successful implementation as:

1. **Awareness:** Customers must be made aware that their existing pricing plan may either be eliminated or significantly modified.
2. **Education:** Customers must be helped to understand their own energy usage and which rate option is best for them. In addition, customers need to understand how they can change their behavior to leverage the rate. This includes education on conservation, load shifting, DR, and energy efficiency opportunities
3. **Drive Action:** Customers need to know when to act. As default date nears, customers need to understand that they can affirm to PDP or opt out. If they don't actively select an option, customers need to be informed that they will default to PDP.
4. **Provide On-going Support:** Whatever their choice, customers need to understand how managing their peak usage will impact energy costs. PG&E will provide on-going support on rate education. PG&E will continue to educate customers about benefits associated with energy efficiency and demand response technologies.

The decision offers examples of performance metrics to be included in the Advice Letter, but clarifies that the suggested metrics should not be limited to the list provided. PG&E's proposed metrics include timeframes for establishing a baseline population, providing target values and reporting dates for each metric.

PG&E proposes two ways of gathering information to track whether they are achieving target values: (1) tracking its efforts to reach customers and (2) gathering information through customer awareness and customer experience surveys. Customers that opt off of PDP will also be surveyed. Some survey

questions will be used as metrics, but others will provide additional data that is tracked to aid PG&E in making adjustments to future outreach.

PG&E explains in its Advice Letter that results from surveys will be compared against target metric values to determine if PG&E's outreach and education is achieving the desired results. PG&E also states that it will periodically review metrics and target values and propose to modify, add or eliminate metrics and target values as appropriate. PG&E proposed the following eighteen metrics:

1. Customers aware of TOU or PDP.
2. Customers aware of receiving information about new technologies that can help them manage energy use on the PDP pricing plan (ex. programmable thermostats).
3. Percent of Service Agreements sent a pre-default communication about rate change.
4. Number of community organizations from which PG&E requests support for local PDP outreach (Ex: Chambers and Trade Groups).
5. Number of community organizations that agree to assist PG&E with local PDP outreach efforts.
6. Percent of Service Agreements that PG&E attempted to directly contact.
7. Percent of Service Agreements that PG&E is able to directly contact.
8. Percent of Service Agreements that PG&E is unable to directly contact that receive a customized information kit (via mail, email).
9. Percent of Service Agreements that had an educational contact with PG&E.
10. Percent of Service Agreements that were provided a customized bill analysis (in-person, online, direct mail) prior to the start of their PDP

event season or transition to TOU.

11. Customers were provided with information to make an informed decision regarding their PDP participation.

12. Customers understood how their monthly bill was impacted by their participation on the PDP or TOU (Small Ag only) pricing plan.

13. Customers knew they may need to manage their electricity use differently on PDP event days or on TOU (Small Ag only).

14. PG&E information and tools were informative in helping customers participate in PDP.

15. Customers (they or someone in their company) knew that a PDP event was coming.

16. Percent of Service Agreements sent a Welcome Kit.

17. Percent increase in frequency of visits to customers' online accounts by all eligible Business Service Agreements.

18. Percent of escalated customer complaints received of all Business Service Agreements.

## **NOTICE**

Notice of AL 3693-E was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 3.14 of General Order 96-A.

## **PROTESTS**

AL 3693-E was not protested.

## **DISCUSSION**

PG&E is responsible for educating customers on all aspects of the new rates. The utility must track its efforts and measure the effectiveness of the outreach and education campaigns. In order to evaluate PG&E's proposed tracking studies and metrics, it is necessary to review the utility's Outreach Plan and the directives in D. 10-02-032. Ordering Paragraphs 2, 3, 6, and 11 of the decision provide details about the new rates that PG&E overlooked in its proposed metrics. Modifications to the proposed tracking studies and metrics are described below.

**Several of PG&E's proposed metrics focus on tracking the utility's efforts to reach customers. PG&E should track these efforts, but they should not be considered metrics for measuring customer understanding of the new rates.**

PG&E proposed six metrics that focus on the utility's efforts to contact customers. The Commission agrees with the utility that it should be keeping track of this information. These activities show that PG&E has attempted to reach and provide information to customers. However, this data alone is not a strong indicator of whether customers understand the materials and tools that they can use to help them respond on the new rates. The following PG&E proposed metrics must be tracked, but are not considered to be metrics and measured against a target value.

3. Percent of Service Agreements sent a pre-default communication about rate change
4. Number of community organizations from which PG&E requests support
5. Number of community organizations that agree to assist PG&E with local PDP outreach efforts
9. Percent of Service Agreements that had an educational contact with PG&E
10. Percent of Service Agreements that were provided a customized bill analysis prior to the start of their PDP event season or transition to TOU
16. Percent of Service Agreements sent a welcome kit

PG&E must add these activities to the other information that it proposed to track through its customer awareness and experience surveys. PG&E's proposed studies will track whether customers implemented new technologies, the specific actions they took, how many events they responded to and their satisfaction with the rate. PG&E will also survey customers on the types and frequency of

communication they received and which materials and marketing channels were most useful to them. The Commission agrees that PG&E must collect this data to inform the amount and types of communication customers need to understand and be prepared for the new rates.

All of the findings from the tracking studies will be reported in quarterly presentations and semi-annual reports. PG&E proposed reporting dates for its tracking studies, which are outdated and need to be revised. PG&E must provide revised reporting dates to Demand Response and Business and Community Outreach staff at the CPUC one week prior to the March 2011 quarterly presentation.

**PG&E explains that the benefit of measuring survey results against target values is to determine if the utility is achieving outreach objectives. However, PG&E must also use the results to inform how to modify and improve its outreach and education so that customers understand the new rates.**

In the Advice Letter, PG&E describes that the intent of measuring results against target values is to allow, "PG&E to better understand the efficacy of its outreach efforts".<sup>4</sup> The utility also states in the Advice Letter that it will review and modify metrics as needed. PG&E is focused on the metrics and target values, and how results convey if the utility has successfully met its objectives. PG&E fails to explain how it will use this information. The purpose of knowing how the utility's efforts measure up to the target values is to determine what is effective, and what is not effective at reaching and educating customers. PG&E must then use this information in combination with the results gathered from the tracking studies to adjust and improve their outreach tactics where needed.

The Commission agrees that metrics and target values may need to be adjusted and that PG&E can propose changes. However, the utility must recognize that a greater priority is identifying how to adjust their outreach and education in response to results gathered from customer surveys. In its quarterly and semi-annual reports, PG&E must report on successes and failures to reach and educate customers that have been identified through metrics and target metric values.

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<sup>4</sup> PG&E Advice Letter 3693-E p. 6



The reports must also include PG&E's strategies to capitalize on aspects of outreach that are successful and its proposed solutions to overcome challenges.

**PG&E's Outreach Plan includes most of the information that customers need to understand prior to TOU and PDP default dates. However, its metrics and tracking studies do not determine if PG&E customer service representatives (CSRs)<sup>5</sup> are accurately providing this information to customers prior to their default date.**

PG&E includes five points that customers should understand before their default date to their new rate: 1) their existing pricing plan may be eliminated or significantly modified, 2) they need to understand which rate option is best for them, 3) they need to know when their default date is coming, 4) they can affirm or opt out, and 5) if they do neither they will be defaulted onto the new rate. The Commission agrees that PG&E is responsible for educating customers about this information.

PG&E proposed metrics that will monitor if customers are receiving information from the utility. However, most large customers and at least ten percent of SMB customers will be educated about the new rate options directly from a PG&E CSR. PG&E did not propose a method to evaluate if CSRs are properly educating customers so they can make an informed choice. CSRs should not recommend which rate option is best for customers as an alternative to properly educating them so they can make a decision. PG&E must track whether customers that had contact with a PG&E CSR were able to make a choice based on the information provided, or if they were advised to opt out of new rate.

In its comments, PG&E clarified that the utility can and should expect customers to respond that they understood and recalled education of the benefits of the rates as well as their options, including the option of opting out of PDP. PG&E also stated that it believes that all customer options should be presented in a balanced

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<sup>5</sup> Any reference to CSRs includes the following *if* they are trained and authorized by PG&E: Account Managers, Business and Customer Field Representatives, Community Relationship Managers, Business Customer Advisors, PG&E representatives in 3<sup>rd</sup> party and Government partnerships, Governmental Relations Representatives, PDP Specialists and third party telemarketing and canvassing representatives.

way that best enables the customer to make an informed decision. The Commission agrees with PG&E. PG&E must track this information to determine if representatives are in fact presenting information to customers in a balanced way.

Additionally, PG&E fails to address the importance of educating customers about the bill protection policy of the new rate. In Ordering Paragraph 6, D. 10-02-032 approves one year of bill protection for all customer classes. Customers are able to opt out at any time during the first year, and they will receive a credit for the difference in the following month. An advantage of first year bill protection is that a customer who cannot determine which rate is best can have up to a year to see how they perform on the rate without being negatively impacted. This protection is an advantage to customers and to PG&E. PG&E can use the first year to continue to educate customers about DR and load shifting strategies.

Accordingly, PG&E should add metrics to identify if customers were informed about bill protection. The utility also needs to measure if customers understand what bill protection means and that it applies to their first year on the rate. Bill protection metrics that PG&E must add include the following:

- Customers understand what bill protection<sup>6</sup> means,
- Customers understand that on PDP there is bill protection for the first year they are on the rate, and
- Customers understand that they can opt out of PDP in the first year and their bill will be trued up the following month.

**PG&E fails to emphasize the necessity of educating all small agricultural and small business customers about the change in their rates from a flat rate to a TOU rate.**

Ordering Paragraphs 2 and 3 of D.10-02-032 state that flat rates will no longer be available to small agricultural and small/medium commercial customers by

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<sup>6</sup> If the utility changes or modifies this phrase, the utility must report customer understanding of this concept

certain dates,<sup>7</sup> and that these customer classes will be on TOU rates. PG&E describes TOU rates as complex to understand. The utility also mentions that customers need to understand how the new rate can impact them and that there are opportunities for them to adjust their energy usage to respond to the rate during on-peak hours. Since these customers will not be able to opt off of this rate it is critical to success of the outreach campaign that PG&E's customers are aware of the rate change before it happens. PG&E proposed several metrics that are important for customers defaulting to TOU to understand:

1. Customers aware of TOU or PDP,
12. Customers understood how their monthly bill was impacted by their participation on the PDP or TOU (Small Ag only) pricing plan, and
13. Customers knew they may need to manage their electricity use differently on PDP event days or on TOU (Small Ag only).

The utility specified that it will report its results of customer awareness of TOU in the December 2011 semi-annual report. However, SMB customers default onto TOU in November 2011. Customer awareness of the rate needs to be measured before the default date, so that the utility has information to make adjustments to outreach as needed to prepare customers. Therefore, PG&E must report customer awareness of TOU in September 2011 for SMB customers and in December 2011 for Small Ag customers.

Similarly, the utility proposes that results of the second and third metrics will be reported in the December 2012 semi-annual report. This reporting date occurs after the customer default dates, and after the customers have been on the rate for a summer season. It is crucial for SMB and Small Ag customers to understand that their monthly bills can change as a result of the rate and there are actions that they can take to reduce impacts to their bills. The utility needs to educate customers about this before the summer season begins, and if customers do not understand this information the utility must adjust its outreach

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<sup>7</sup> As noted in Footnote 1, some of the default dates in D.10-02-032 have subsequently been modified by the Commission's Executive Director.

accordingly. Therefore, PG&E must report on these metrics in the June 2012 semi-annual report.

Additionally, because these customers will not be able to opt off of the TOU rate, it is critical to the success of the outreach campaign that PG&E's customers are aware of the rate change. The Commission directs the utility to add the following metrics for small customers:

- Customers on TOU understand that their rate increases during certain hours of the day,
- Small Ag and SMB customers understand that TOU is their new applicable rate and they cannot opt out to return to their previous rate,
- SMB customers understand that if they opt out of PDP they will return to a TOU rate, and
- SMB customers agree or disagree that PG&E tools and information enabled them to understand how their bill was impacted by the TOU rate.

The first three of these additional metrics must be reported at the September 2011 quarterly report presentation for SMB customers and in the December 2011 semi-annual report for Small Ag customers.

In Ordering Paragraph 11, D.10-02-032 directed PG&E to have customer service representatives directly contact at least 10 percent of the SMB customers whose bills are likely to be increased by the largest percentage based on the previous year's usage if they stay on PDP. PG&E proposed three metrics to evaluate their attempts to reach these customers:

6. Percent of Service Agreements that PG&E attempted to directly contact,
7. Percent of Service Agreements that PG&E is able to directly contact, and
8. Percent of Service Agreements that PG&E is unable to directly contact that receive a customized information kit (via mail, email).

Of these three proposed metrics, the only one that directly relates back to Ordering Paragraph 11 is the Percent of Service Agreements that PG&E is able to directly contact. It is important to note that the decision specifically directs the utility to directly contact those customers whose bills are likely to see the largest percentage increase (the top 10% of such customers). We clarify here that the target value for the direct contact metric is that all SMB customers identified in

the top 10% for bill increases will be contacted. PG&E may track its efforts with regard to the percentage of service agreements it attempted to directly contact and those that it sent a customized information kit, but these efforts are not considered metrics.

In its comments, PG&E requested that two clarifications be made to the metric: percent of SMB customers (that are the 10 percent of all customers whose bills are likely to be increased by the largest percentage based on the previous year's usage) that PG&E customer service representatives have directly contacted. First, PG&E asks to clarify that 'customer service representatives' include employees and contracted agents that have been trained and authorized by PG&E to speak to customers. PG&E states that these representatives can include, Account Managers, Business and Customer Field Representatives, Community Relationship Managers, Business Customer Advisors, PG&E representatives in 3<sup>rd</sup> party and Government partnerships, Governmental Relations Representatives, PDP Specialists and third party telemarketing and canvassing representatives. Second, PG&E seeks clarification that 'direct contacts' include phone calls, scheduled appointments, cold-calls, workshops, webinars, industry speaking engagements and mail if a customer requests it.

The purpose for directing the utility to have direct contact with these customers is to ensure that customers can have two-way interactions with trained staff about the upcoming rate changes. PG&E is responsible for providing opportunities for these customers to ask questions and receive information from representatives that understand the rates, and the potential impacts individual customers may have. The Commission agrees with PG&E's expansion of the term customer service representatives, and emphasizes that these staff must be trained and authorized by PG&E. PG&E's list of types of direct contacts is acceptable, with one exception; only live, not recorded webinars are considered a direct contact. Also, PG&E must have a way to identify that the customers attending outreach activities such as workshops, industry engagements and live webinars are in the 10% group of SMB customers whose bills are likely to be increased by the largest percentage.

**PG&E does not provide customers with foundational understanding of the meaning of “peak”.**

PG&E explains that part of its ongoing support is to explain that managing peak usage can impact their energy costs. Helping customers understand this information after their default date is not sufficient. Outreach and education prior to PDP and TOU default dates is an opportunity to educate customers about the meaning of peak, and the timing component of the rates. If customers understand the concept of peak before they are defaulted onto their new rates they will better understand the link between their usage and the impact on their bills. Understanding of the peak hours is crucial for their participation in reducing load. Metrics to determine understanding of peak include:

- Customers understand that there are peak hours during the day when demand for electricity is the greatest and the cost of providing electricity is more expensive,
- Customers understand that the reduction of the peak is dependant on customer actions on very few specific days and times, and
- Customers understand that by taking action during these few specific days they can reduce the cost of supplying electricity.

In its comments PG&E states that asking customers to recall that their actions can reduce the cost of supplying electricity is a very specific way to describe the policy concept behind critical peak pricing. PG&E proposed revising the metric to read: Customers understand that by taking action during these few specific days they can help reduce overall system costs and constraints in supplying energy (e.g. reduce the need to build or maintain rarely used power plants, reduce the risk of power interruptions, etc.). The Commission accepts this revision.

**Summary of Revised Metrics and Timelines**

In summary via this resolution, the following revised set of education and outreach metrics are to be used for PG&E's Peak Day Pricing and Time-of-Use outreach and education activities for non-residential customer classes:

1. Customers aware of TOU or PDP.

2. Customers are aware of receiving information about new technologies that can help them manage energy use on the TOU or PDP pricing plan (ex. programmable thermostats).
3. Percent of SMB customers (that are the 10 percent of all customers whose bills are likely to be increased by the largest percentage based on the previous year's usage) that PG&E customer service representatives have directly contacted.<sup>8</sup>
4. Customers were provided with information to make an informed decision regarding their PDP participation.
5. Customers understood how their monthly bill was impacted by their participation on the PDP or TOU pricing plan.
6. Customers knew they may need to manage their electricity use differently on PDP event days or on TOU
7. PG&E information and tools were informative in helping customers participate in TOU or PDP.
8. Customers (they or someone in their company) knew that a PDP event was coming.

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<sup>8</sup> Types of representatives that can contact customers may include the following *if* they are trained and authorized by PG&E: Account Managers, Business and Customer Field Representatives, Community Relationship Managers, Business Customer Advisors, PG&E representatives in 3<sup>rd</sup> party and Government partnerships, Governmental Relations Representatives, PDP Specialists and third party telemarketing and canvassing representatives. Direct contacts may include phone calls, scheduled appointments, cold-calls, workshops, live webinars, industry speaking engagements and mail if a customer requests it. PG&E must be able to identify if customers attending events are in the 10% group.

9. Percent increase in frequency of visits to customers' online accounts by all eligible Business Service Agreements.
10. Percent of escalated customer complaints received of all Business Service Agreements.
11. Customers understand what bill protection<sup>9</sup> means (they can opt out of PDP any time in the first year or at the end of the first year and they will be credited for the difference of their OAR bill).
12. Customers understand that on PDP there is bill protection for the first year they are on the rate.
13. Customers on TOU understand that their rate increases during certain hours of the day.
14. Small Ag and SMB customers understand that TOU is their new applicable rate and they cannot opt out to return to their previous rate.
15. SMB customers understand that if they opt out of PDP they will be on a TOU rate.
16. SMB customers agree or disagree that PG&E tools and information enabled them to understand how their bill was impacted by the TOU rate.
17. Customers understand that there are peak hours during the day when demand for electricity is the greatest and the cost of providing electricity is more expensive.
18. Customers understand that the reduction of the peak is dependant on customer actions on very few specific days and times.

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<sup>9</sup> If the utility changes or modifies this phrase, the utility must report customer understanding of this concept



19. Customers understand that by taking action during these few specific days they can help reduce overall system costs and constraints in supplying energy (e.g. reduce the need to build or maintain rarely used power plants, reduce the risk of power interruptions, etc.)

The results for metrics numbered 1, 13, 14 and 15 must be reported by PG&E at the September 2011 quarterly report presentation for SMB customers and in the December 2011 semi-annual report for Small Ag customers. Results for metrics numbered 5 and 6 must be reported in the June 2012 semi-annual report for Small Ag customers. The remaining metrics require new or revised timeframes to identify the baseline populations, metric target values and reporting dates. PG&E must provide target values, reporting dates and timeframes to identify baseline populations to Demand Response and Business and Community Outreach staff at the CPUC one week prior to the March 2011 quarterly presentation. The newly proposed timelines, target values, justification for target values, and reporting dates will be reviewed and discussed during the quarterly presentation. At the June semi-annual report PG&E will share result of its baseline population studies.

In its comments, PG&E agrees that metrics can be initially reported in a quarterly presentation, but requests that ongoing progress against a metric target value be reported in a semi-annual report. PG&E additionally commented that research studies would take 6 to 8 weeks to conduct and compile. Therefore, results that are reported in September will be based on customer understanding in July. The Commission understands that in July the outreach effort for SMB customers will be in its middle stages. It is essential to gather information on customer understanding during the mid point of outreach to determine if efforts are reaching and educating customers.

The utility is expected to achieve its target metrics by customer default dates. Since outreach and education are ongoing, the utility may propose additional dates after customer defaults with higher target metric values. When research is gathered during a mid point in outreach, the purpose is to identify if the utility is on target. The September 2011 quarterly report presentation must include PG&E's progress towards its target values based on customer research it conducts in July. The report must also include PG&E's strategies to capitalize on aspects of outreach that are successful and its proposed solutions to overcome challenges so that the utility can reach its default date target metric values and target values for proposed dates after the default.

The revised set of metrics is a starting point, from which PG&E and the Commission will identify success for PG&E's customer outreach and education. In both the March and June reports, PG&E will identify target values and provide the following: baseline results from customer surveys, justifications for target values, target dates when target values will be achieved, and reporting dates. If PG&E does not enhance the metrics to more clearly define successful outreach and education, the Energy Division Director may modify the metrics and assign target values and target dates.

### **COMMENTS**

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

The California Farm Bureau Federation submitted comments in a timely manner on January 18, 2011. The comments did not propose changes to the resolution. The Farm Bureau expressed support for metrics 12 through 15, which measure customer understanding of TOU and PDP rates. The Farm Bureau further stated that a reporting date of December 2011, 2 months prior to the TOU default date for small agricultural customers, "will provide a benchmark to assess any changes that are warranted."<sup>10</sup>

PG&E submitted comments in a timely manner on January 18, 2011. PG&E proposed revisions to metrics 3, 15 and 19. PG&E asked for clarifications of the terms 'Customer Service Representatives' and 'direct contacts' in reference to

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<sup>10</sup> Comments of the California Farm Bureau Federation, p. 2, January 18, 2011

outreach to SMB customers. The utility also commented on the implications for changing its research timeline, and seeks clarification on reporting frequency of the metrics. The utility also commented on Ordering Paragraph 2, stating that PG&E should expect customers to recall education about their options including the option to opt out. PG&E's comments are addressed throughout this resolution.

PG&E also noted that on January 14, 2011 the utility filed a Petition for Modification of D. 10-02-032 in which it proposes to 1) default SMB customers to TOU in November 2012, and PDP in March 2014, and 2) default Small Ag customers to TOU in March 2013. If necessary, the response to the PFM will address revisions to timelines pertaining to this resolution.

DRA submitted reply comments in a timely manner on January 24, 2011. DRA acknowledged that PG&E has submitted a Petition to Modify D. 10-02-032 to change the default dates for SMB and small Ag customers. DRA recommended modifying several metrics to measure customer understanding of PDP *or* TOU so that they are flexible in the event that the Decision is modified and the PDP default date is changed. The Commission agrees with DRA's proposed changes to metrics 2, 5, 6 and 7. Metric 4 will not be changed, because it is not applicable to TOU, since customers will not choose whether or not to be on the rate.

DRA also proposed an additional metric to measure customers' load reduction during peak, compared to baseline usage in the last six months. The Commission agrees with DRA that it is important to track load reductions from customers on new time-varying rates. However, it will not be considered as a metric for successful outreach and education of the rates.

## **FINDINGS AND CONCLUSIONS**

1. Decision 10-02-032 directed Pacific Gas and Electric Company to file an Advice Letter to propose metrics to measure the success of its Time-of-Use and Peak Day Pricing outreach and education campaign for non-residential customers.
2. PG&E filed AL 3693-E on June 25, 2010 proposing 18 metrics for its Time-of-Use and Peak Day Pricing outreach and education campaign.

3. The six proposed metrics that focus on PG&E's efforts to contact customers must be tracked but are not considered metrics for measuring customer understanding of the new rates.
4. The purpose of measuring customer responses against target metric values is to inform PG&E's approach to reaching and educating customers.
5. PG&E must use the results of its surveys to modify its outreach and education to customers as needed, and report on successes, challenges, and proposed adjustments to its outreach campaign in its regular reporting requirements.
6. PG&E failed to propose that interactions between CSRs and customers must be tracked to ensure that CSRs are educating customers and not advising them to opt out of PDP.
7. PG&E failed to propose metrics that measure successful education about bill protection for PDP participants.
8. PG&E failed to propose metrics to adequately determine if small agricultural and business customers understand that their rates will change from a flat rate to a Time-of-Use rate.
9. The target value for the direct contact metric is that all SMB customers identified in the top 10% for bill increases will be contacted.
10. PG&E's proposed reporting dates for small agricultural and small and medium business customer metrics will not provide the utility with timely information about its outreach since these customers will have already defaulted onto the new rates.
11. PG&E failed to provide adequate measurements of customer understanding of peak.
12. The timelines for identifying target values and baselines for metrics must be revised.

**THEREFORE IT IS ORDERED THAT:**

1. The request of the Pacific Gas and Electric Company to measure the success of educating non-residential customers about Time-of-Use and Peak Day Pricing rates as requested in AL 3693-E is approved with the modifications outlined in this resolution.
2. PG&E must add survey questions to its tracking studies to identify if CSRs are adequately educating customers so they can make an informed decision. Survey questions must ask if customers were advised by a CSR to opt off of PDP prior to having the opportunity to understand information about their rate choices and make a decision based on their understanding.
3. The 18 metrics listed under the "Summary of Revised Metrics and Timelines" in this resolution shall be used to evaluate PG&E's customer education and outreach for Peak Day Pricing and Time-of-Use rates for non-residential customers.
4. The results for metrics numbered 1, 13, 14 and 15 must be reported by PG&E at the September 2011 quarterly report presentation for SMB customers and in the December 2011 semi-annual report for Small Ag customers.
5. Results for metrics numbered 5 and 6 must be reported by PG&E in the June 2012 semi-annual report for Small Ag customers.
6. The remaining metrics require new or revised timeframes to identify the baseline populations, metric target values and reporting dates. PG&E must provide target values, reporting dates and timeframes to Demand Response and Business and Community Outreach staff at the CPUC one week prior to the March 2011 quarterly presentation. The newly proposed timelines, target values, justification for target values and reporting dates will be reviewed and discussed during the quarterly presentation.
7. If PG&E does not enhance the metrics to more clearly define successful outreach and education, by providing satisfactory target values, justifications for target values, and target dates when target values will be achieved, then the

Energy Division Director may modify the metrics and assign target values and target dates.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on January 27, 2011; the following Commissioners voting favorably thereon:

/s/ Paul Clanon  
Paul Clanon  
Executive Director

MICHAEL R. PEEVEY  
PRESIDENT  
MICHEL PETER FLORIO  
CATHERINE J. K. SANDOVAL  
Commissioners

Commissioner Timothy Alan Simon, being necessarily absent, did not participate.