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Pacific Gas and Electric Company's COVID-19 Emergency Customer Protections Transition Plan



April 1, 2021



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1 Introduction

PG&E recognizes the hardships that customers may be facing due to the impacts of the COVID-19 pandemic. The statewide unemployment rate is 8.8 percent as of January 2021, compared to 5.5 percent in March 2020,¹ and increases in unemployment have been concentrated among low-income households². We know that many of our customers are facing uncertainty and financial instability due to loss of life and/or livelihood, school and childcare closures, and other economic impacts.

In response, PG&E implemented emergency protections in March 2020 to support our customers and continues to offer these protections through June 30, 2021. With the expiration of the COVID-19 customer protections in the coming months, we are committed to easing the anxiety customers may face by providing ways to manage their bills and energy usage. The purpose of this plan is to describe how we will reduce customer anxiety by:

- Implementing programs or initiatives to assist them in bill management
- Proactively communicating with customers to inform them of changes in protections and help enroll them in programs to manage their bills

PG&E's transition plan is organized in 12 sections that provide the following information in support of these objectives:

- **Section 2:** details the **background** on our implementation of customer protections and our transition plan's **objectives, guiding principles, and desired outcomes**
- **Section 3:** provides a **timeline of resumed and new activities** and details on our plans to support customers during the transition
- **Section 4:** discusses our **marketing education and outreach plan** to increase customer awareness of the status of their accounts, help customers get out of arrears, and enable customers to stay current on their bills through ongoing support and financial assistance
- **Section 5:** identifies the **operational processes and training** that we will implement to efficiently administer our transition plan and ensure a positive customer experience
- **Section 6:** discusses **how we incorporated stakeholder feedback** on our plan
- **Section 7:** demonstrates how we considered **best practices and lessons learned from utilities and industry leaders** to develop our transition plan
- **Section 8:** presents the **metrics** we propose to track and monitor to assess progress
- **Section 9:** includes the **budget** for transition activities, including incremental funds we propose to record to the COVID-19 Pandemic Protections Memorandum Accounts
- **Section 10:** demonstrates how our transition plan **aligns with the other IOUs**
- **Section 11:** explains **how PG&E's transition plan complies** with related program requirements and is consistent with appropriate state and local health orders
- **Section 12:** summarizes and concludes our transition plan

¹ Current Month Unemployment Rate and Labor Force Summary

<https://www.labormarketinfo.edd.ca.gov/data/unemployment-and-labor-force.html>

² "Income Inequality and Economic Opportunity in California," Sara Bohn, Dean Bonner, Julien Lafortune, and Tess Thorman, Public Policy Institute of California <https://www.ppic.org/wp-content/uploads/incoming-inequality-and-economic-opportunity-in-california-december-2020.pdf> (December 2020). The cited figures are California data from the Basic Monthly Current Population Survey published by the Bureau of Labor Statistics on a monthly basis covering a period from January 2020 through September 2020.

2 Background

In response to Governor Newsom's March 4, 2020 declaration of a state of emergency due to the COVID-19 pandemic, PG&E suspended disconnections and offered our most flexible payment plans to all residential and small business customers.³ Following the California Public Utilities Commission's (CPUC or Commission) adoption of Resolution M-4842 on April 16, 2020, we offered additional assistance through our income-qualified and medical baseline programs and extended COVID-19 customer protections for residential and small business customers⁴ through April 16, 2021.⁵ In addition to the protections adopted in Resolution M-4842, PG&E offered additional assistance to our customers, such as extending the repayment period for energy efficiency on-bill financing (OBF) loans⁶ and reduced the High Usage Surcharge.⁷ See Table 1 for the protections that PG&E extended in response to the COVID-19 pandemic.

On February 11, 2021, the Commission adopted Resolution M-4849, which extends the protections for residential and small business customers through June 30, 2021.⁸ Resolution M-4849 also directs PG&E to submit a transition plan to discuss how it will effectively ease customer anxiety during the transition.⁹

Table 1. Overview of COVID-19 Customer Protections

Customer Protection ¹⁰	PG&E Action
Implement payment plan options for residential customers	In place through 6/30/21—see: <ul style="list-style-type: none"> Resolution M-4842 and Advice 4224-G/5816-E and supplements Resolution M-4849
Suspend disconnection for nonpayment and associated fees; waive deposit and late fee requirements for residential customers	
Support low-income residential customers by: <ul style="list-style-type: none"> a) Freezing all standard and high-usage reviews for the California Alternative Rates for Energy (CARE) program eligibility for 12 months and potentially longer, as warranted b) Contacting all community outreach contractors, the community-based organizations who assist in enrolling hard-to-reach low-income customers into CARE, to help better inform customers of eligibility changes c) Partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months d) Indicate how the energy savings assistance program can be deployed to assist customers 	
Suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections	
Discontinue generating all recertification and verification requests that require customers to provide their current income information	
Include customer protections as part of IOU community outreach and public awareness plans under Section 8386(c)(16)(b)	

³ See PG&E Advice 4227-G/5784-E and supplements.

⁴ Small business electric customers are all non-residential metered service customers whose annual usage is equal to or less than 40,000 kWh or whose demand is equal to or less than 20 kW. Small business gas customers are all non-residential metered customers whose usage does not exceed 10,000 therms annually. Non-residential customers are also identified as small businesses if they meet the definition of a "micro-business" under California Government Code 14837.

⁵ See PG&E Advice 4244-G/5816-E and supplements.

⁶ See PG&E Advice 4236-G/5805-E.

⁷ See D.20-06-013.

⁸ Resolution M-4849, Ordering Paragraph (OP) 1

⁹ Resolution M-4849, OP 5

¹⁰ The COVID-19 consumer protections did not include protections associated with destruction of property or degradation of service (e.g., stopping estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency.)

Customer Protection ¹⁰	PG&E Action
Meet and confer with the Community Choice Aggregators as early as possible to discuss their roles and responsibilities for each emergency customer protection	
Support medical baseline customers by: <ul style="list-style-type: none"> a) Suspending all customer removals from the medical baseline program b) No longer sending forms to customers that require them to re-certify through a qualified medical practitioner for the medical baseline program c) Allowing customers to enroll in the medical baseline program without authorization from a qualified medical practitioner 	In place through 6/30/21—see: <ul style="list-style-type: none"> • Advice 4227-G/5784-E and supplements • Advice 4224-G/5816-E and supplements • Resolution M-4849

2.1 Transition Plan Guiding Principles and Desired Outcomes

We developed our transition plan in accordance with guiding principles and desired outcomes (see Table 2), which recognize that the pandemic has uniquely impacted all Californians and that supporting a positive customer experience requires a thoughtful and comprehensive analysis of our customers' needs. To this end, PG&E considered available customer data to identify trends and opportunities, benchmarked with the other investor-owned utilities (IOUs) and industry leaders, and engaged a broad spectrum of external stakeholders, including the water utilities, community choice aggregators (CCAs), community-based organizations (CBOs), the People with Disabilities Aging Advisory Council (PWDAAC),¹¹ and the Low-Income Oversight Board (LIOB). We discuss this coordination further in Sections 4, 6, 7, and 10.

Table 2. PG&E's Objectives, Guiding Principles, and Desired Outcomes

Objectives	Effectively ease customers through a transition from COVID-19 protections and reduce their anxiety by: <ul style="list-style-type: none"> • Implementing programs or initiatives to assist them in bill management • Proactively communicating with customers to inform them of changes in protections and help enroll them in programs to manage their bills
Guiding Principle	Desired Outcome
Focus on the customer experience	<ul style="list-style-type: none"> • Make it easy to pay and/or get assistance through tailored programs and services • Communications are made early, and they are clear and simple to understand • Listened to our customers and incorporated their feedback
Engage stakeholders	<ul style="list-style-type: none"> • Build community relationships • Diverse range of stakeholders consulted • Constructive feedback considered • Commitments maintained

¹¹ PG&E established the PWDAAC to help improve support and allow for feedback from vulnerable and access and functional needs customers regarding the Public Safety Power Shutoff (PSPS) program.



3 Tactical Plan for Resumed and New Activities

In this section, we describe the timeline of events for resuming our business-as-usual programs and services.¹² These timelines illustrate the steps we are putting in place to help customers before and after the expiration of customer protections. PG&E recognizes the importance of providing customers early insight into the expiration of the COVID-19 protections. As such, we are implementing a two-pronged approach to our customer communication strategy – “pre-transition” communications and “post-transition (during and after the transition). We believe this early communication strategy will help customers have the information they need to prepare for the transition. Details on our approach to proactively communicate with customers to inform them of the changes to programs and services are included in Section 4.

¹² Certain customers impacted by wildfires and other disasters pursuant to D.19-07-015 will continue to receive emergency customer protections. For more information, see PG&E Advice 4305-G/5939-E (2020 August Fires), 4311-G/5957-E (Creek Fire), 4322-G/5973-E (Oak, Glass, Zogg Fires), and 4383-G/6087 (January 2021 Winter Storms).



COVID-19 Customer Protections	Jan - Jun	Jun	July		Aug																															Sept																Oct						
	1 - 30	30	1	2 - 31	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16-30	1						
Residential Collection Activities	Pre-transition communications explaining COVID-19 customer protections expiration and program opportunities	Moratorium ends						N												N						C			C		D																											
Small Business Collection Activities								N									C					D																																				
CARE/FERA Recertifications			N		N																																N													B								
CARE/FERA Post Enrollment Verifications			N														N	B																																								
MBL Self-Certification			N																															N	B																							
MBL Recertification through Medical Practitioner			N																																					N	B																	

Key	
Notice sent to customer	N
Customer response period	
Call made to customer	C
Disconnection	D
Removed in 1 - 2 billing cycles	B



3.1 Credit Protections

Following Governor Newsom's emergency declaration on March 4, 2020, PG&E suspended disconnections, extended its most flexible payment plans, and waived deposits for residential and small business customers. While Resolution M-4849 extends these protections through June 30, 2021, D.20-06-003 requires PG&E to implement permanent measures to support residential customers, including offering a 12-month payment plan and eliminating deposits to establish or re-establish service.¹³ PG&E also offers programs and services to support small business customers, including offering a 12-month payment plan and programs to increase energy savings to lower costs. PG&E describes its transition plan for each of the applicable protections in further detail below.

3.1.1 Disconnections

In March 2020, PG&E suspended disconnections to ensure Californians could continue to access essential utility service during the pandemic. Since pausing disconnections, many of our customers have fallen behind on their bills and accumulated past due balances (arrears). As of January 2021, approximately 21 percent¹⁴ of our residential customers are in arrears, compared to approximately 16 percent in January 2020.¹⁵ This situation can cause significant stress and anxiety for many of our customers, and we know that a thoughtful transition timeline is critical to ensuring customers are aware of the programs and services we have in place to help them get back on track. PG&E views disconnection due to non-payment **as a last resort** and intends to work with customers that have arrears to increase awareness of available assistance programs, such as the new Arrearage Management Plan (AMP).

Arrearage Management Plan

In February 2021, PG&E launched the Arrearage Management Plan (AMP), a new payment plan option to help qualifying residential customers reduce unpaid balances on their bills.

With each on-time payment, AMP will forgive 1/12 of the eligible debt a customer owes at the time of enrollment. After twelve on-time payments of the monthly current charges, the customer's eligible debt will be forgiven up to \$8,000.

In addition, several existing policies mitigate the risk of disconnection for residential customers. For example, PG&E does not disconnect residential customers if:¹⁶

- The customer qualifies for medical baseline and agrees to a 12-month payment plan;
- The customer has not been offered to enroll in all applicable benefit programs administered by PG&E;
- The customer is on a 12-month payment plan and is current on both monthly bills and the 12-month payment plan;
- The customer has a Low-Income Home Energy Assistance Program (LIHEAP) pledge pending; and

¹³ D.20-06-003, OPs 1d, 8-9.

¹⁴ "Pacific Gas and Electric Company's Monthly Disconnect Data Report," February 22, 2021. Calculated as 1,139,330 residential customers in arrears (Section 3) divided by 5,507,488 active residential customer accounts (Section 7).

¹⁵ "Pacific Gas and Electric Company's Monthly Disconnect Data Report," February 20, 2020. Calculated as 871,883 residential customers in arrears (Section 3) divided by 5,486,580 active residential customer accounts (Section 7).

¹⁶ D.20-06-003, OPs 1b-f.

- Temperatures are forecasted to be above 100 degrees or below 32 degrees on a 72-hour-look-ahead period.

In addition, PG&E will not terminate service for nonpayment of bills or credit deposit requests on Saturdays, Sundays, legal holidays, or when the offices of PG&E are closed to the public.

Residential Customer Timeline

In the months leading up to the moratorium's expiration, PG&E will inform customers about ways we can help them manage their bills, including enrolling/referring them to bill assistance programs. In addition to notifications on the expiration of protections and general marketing of our bill assistance programs, we began proactively calling customers last year to ensure they were aware of resources to support their specific needs. In addition to our traditional marketing channels such as email and direct, mail, we have leveraged our customer service representatives (CSRs)¹⁷ to perform proactive outbound calls to customers. As of February 2021, our CSRs connected with more than 42,000 customers, enrolling 51% of them in financial assistance programs and identifying more than \$5 million in savings for these customers by changing their rate. In addition, our Credit Operations team has also been involved in proactive outbound calls to our customers. In total, PG&E has proactively reached out to more than 200,000 customers as of February 2021 to help them manage their bills.¹⁸

Once the moratorium expires, PG&E will begin segmenting customers for the first phase of disconnection notices. Customer segmentation will be based on the customer's risk level using the following characteristics:

- Number of cycles past due in the past 6, 12, and 14 months;
- Number of payment plans granted in past 12 months;
- Life of account;
- Number of returned payments in the life of the account;
- Number of times shut off for non-payment;
- Current balance;
- Amount past due; and
- Months of service.

As shown in Figure 2**Error! Reference source not found.**, PG&E will provide a full billing cycle (typically 27-33 days) once the moratorium expires for customers to make payments and enroll in payment plans and other assistance programs before any unpaid balance is considered past due.

In this way, PG&E will stagger the restart of its collections process based on a customer's particular billing cycle to provide a consistent period of time to make payments and avoid sending notices to all customers at once. For example, for a customer whose billing cycle runs from the first day of each month, August 2, 2021 would be the earliest possible date that they could receive a notice to pay their past due balance (15-day notice). In the period between receiving a 15-day notice and being eligible for disconnection, PG&E will make several additional attempts to contact customers to help them obtain the assistance they need to avoid

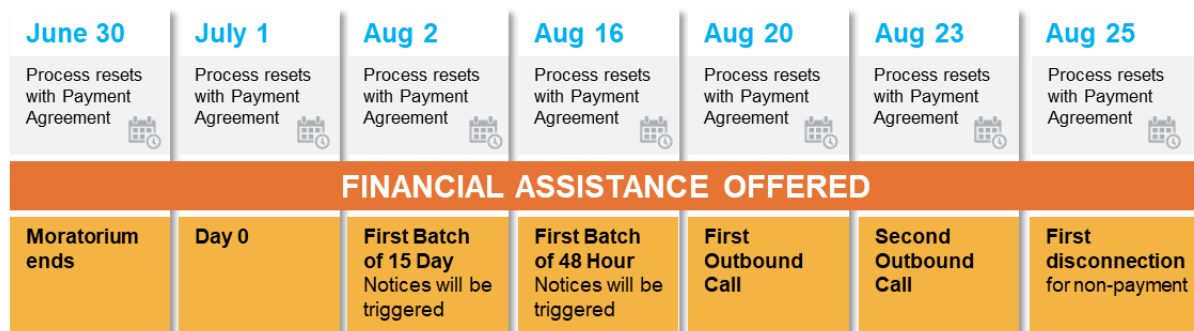
¹⁷ Inclusive of our CSRs who support currently closed Customer Service Offices (CSOs) and our credit team.

¹⁸ Specifics on programs and services that PG&E offers to help our customers manage their bills are included in Appendix A.

disconnection. In a last resort scenario, the earliest that a residential customer could be disconnected for non-payment is August 25, 2021.

Figure 2. Timeline for Earliest Possible Date for Residential Collection Activities

Residential



Customers are encouraged to enroll in assistance programs at any point in the process

Small Business Customer Timeline

In addition to general ongoing outreach to small business customers, our Credit team will be proactively calling our approximately 56,000 small business customers over the next couple of months before the disconnection moratorium ends to share how they can take advantage of offerings (e.g., economic development rate, Business Energy Savings Tool etc.) designed to ease financial challenges and offer convenient ways to manage and pay their bill.

Consistent with its approach for residential customers, PG&E will provide a full billing cycle (typically 27-33 days) once the moratorium expires for small business customers to make payments and enroll in payment plans and other assistance programs before any unpaid balance is considered past due. For a small business customer whose billing cycle runs from the first day of each month, August 2, 2021 would be the earliest possible date that they could receive a seven-day notice to pay their past due balance to avoid disconnection.¹⁹ These customers would also be informed of other options to enroll in if they are unable to pay the balance. The earliest a customer could be disconnected for non-payment is August 16, 2021. Figure 3 outlines the earliest date for each notification activity.

We understand these are difficult financial times, and we urge our customers to call us as soon as they know they will have trouble paying their bill. Disconnection of service is an action that PG&E does not take lightly. It is a last resort taken only after several attempts to work with customers to resolve their bills.

¹⁹ PG&E Rule 8, Section B; Rule 11, Section D.

Figure 3. Estimated Earliest Possible Date for Small Business Collection Activities

Small Business (Non-residential process)



Customers are encouraged to enroll in assistance programs at any point in the process

3.1.2 Deposits

PG&E does not require any residential customer to pay a deposit to establish or re-establish service.²⁰ Beginning July 1, 2021, PG&E intends to re-instate deposits to establish or re-establish service for small business customers. This requirement will be in place on a “going forward” basis for customers that establish or re-establish service. Small business customers can establish credit by:

- Making a credit deposit to secure payment of bills; or
- Furnishing a qualified guarantor to secure payment of applicant’s PG&E bills;

Beginning July 1, 2021, PG&E will provide the following options to assist small business customers who are having difficulty paying the credit deposit to establish or re-establish service in lieu of full payment:

- A flexible payment arrangement;
- Provide an irrevocable letter of credit; or
- Provide a surety bond

PG&E will refund the customer’s deposit as soon as practicable following any review made in accordance with paragraph B.4 of Rule 7, which shows that the customer has paid bills for service for the twelve consecutive months immediately preceding such review without having had more than two past due bills. PG&E will pay interest on deposits.²¹ No interest will be paid if service is temporarily or permanently discontinued for nonpayment of bills.

²⁰ D.20-06-003, OPs 8-9.

²¹ Interest on deposits will be calculated on a daily basis, and compounded at the end of each calendar month, from the date fully paid to the date of refund by check or application to a bill. The interest rate applicable in each calendar month may vary and shall be equal to the interest rate on commercial paper (prime, three months) for the previous month as reported in the Federal Reserve Statistical Release, G.13, or its successor publication except that when a refund is made within the first fifteen days of a calendar month the interest rate applicable in the previous month shall be applied for the elapsed portion of the month in which the refund is made.

3.1.3 Late Fees

PG&E clarifies that we do not charge fees for late payments as a standard practice and that we will continue to not charge fees once the protections expire.

3.1.4 Reconnection Fees

PG&E does not charge reconnection fees for residential customers²² and intends to re-instate its \$17.50 reconnection fee for small business customers that are disconnected after the protections expire.

3.1.5 Flexible Payment Plans

Since March 2020, 1.61 million payment plans have been created on residential and non-residential customer accounts. The collection rate for these customers has been 52% on average.

PG&E continues to offer all residential customers a 12-month payment plan²³ and intends to offer a payment plan for a period of up to 12 months to small business customers that have been impacted by the pandemic and establish their payment plan in 2021.

3.2 Income-Qualified Customer Protections

Following Governor Newsom's emergency declaration on March 4, 2020, PG&E implemented the following protections to support low-income customers:

- Suspended post-enrollment verification for the CARE program;
- Suspended all CARE and FERA program removals and re-certifications;
- Partnered with our REACH administrator to provide up to \$400 in bill assistance to all self-identifying impacted income-eligible customers (a \$100 increase from standard practice);
- Contacted our community outreach contractors to help better inform customers of income-qualified program changes; and
- Supported our ESA customers while certain in-person activities were suspended.²⁴

PG&E describes its plans to transition customers off these protections in further detail below.

3.2.1 California Alternate Rates for Energy Program (CARE) / Family Electric Rate Assistance Program (FERA)

PG&E has observed an increase in CARE/FERA enrollments since pausing re-certifications, program removals, and post-enrollment verification. Specifically, CARE penetration has increased by 13.9% and FERA penetration has increased by 9% since February 2020. In light of the increase in CARE/FERA enrollments, PG&E is committed to ensuring that impacted customers are aware of any actions they might be required to take to remain enrolled in the

²² D.20-06-003, OP 16.

²³ D.20-06-003, OP 1d.

²⁴ In response to local, state, and federal governmental guidance and health directives related to COVID-19, PG&E notified impacted ESA vendors on March 18, 2020 that it would suspend all customer outreach, enrollment, and installation activities in the ESA program that require face-to-face interactions, with the exception of critical activities to ensure the health and safety of our customers. PG&E discontinued the suspension on customer outreach, enrollment, and installation activities in the ESA program on May 31, 2020, and will continue to implement the ESA program in full force, unless directed otherwise based on local, state, and federal governmental guidance and health directives.

programs. PG&E describes its plans to increase customer awareness and support for re-instating the recertification and post-enrollment verification processes in further detail below.

3.2.1.1 Recertification

PG&E requires CARE and FERA participants to recertify their eligibility to remain enrolled in the programs either:

- Every two years for individually metered customers and sub-metered tenants of master-metered customers; or
- Every four years for customers that have a fixed income.

Customers do not need to provide proof of income during recertification and are only required to attest that they still meet the program's eligibility requirements. Customers can recertify by either:

- Completing an automated CARE/FERA application at www.pge.com/carefera
- Renewing through mail or a CARE Community Outreach Coordinator²⁵

PG&E provides five notifications to customers that inform them of the need to recertify their eligibility to remain in the program. Figure 4 describes this notification process which begins 90 days prior to the date that their recertification is due.

Figure 4. Timeline for Earliest Possible Date for CARE/FERA Re-Certification Process and Program Removal



Customers are encouraged to enroll in other assistance programs throughout the process

3.2.1.1.1 Customers Who Would Have Received a Recertification Notice Within the Protection Period

In support of its objective of reducing customer anxiety during the transition period, PG&E will not require all customers who would have received a recertification notice within the protection period (March 2020-June 2021) to recertify immediately upon the expiration of the protections. To this end, PG&E will spread out the recertification process for any customer that would have received a recertification notice during the protection period so that these customers receive notices between July and December 2021.

²⁵ CARE Community Outreach Contractors List
https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/longer-term-assistance/care/COC_Enhanced_Info_List.pdf

For example, assume that a CARE customer would have received a recertification notice on April 15, 2021 in the absence of customer protections and that their recertification due date is July 15, 2021. Because we are not sending notifications to customers during the protection period, the earliest that this customer could receive a 90-day notice is July 1, 2021. This customer would receive the email and direct mail notifications and be removed from CARE or FERA if they do not recertify their eligibility by October 1, 2021.

However, as described above, not all customers that would have been required to recertify during the protection period will receive 90-day notices in July 2021. PG&E will spread these notices out over the remaining months in 2021 to promote a smooth transition back to the recertification process. Once customers successfully recertify their eligibility by their respective due dates, PG&E will use that date as their “anniversary date” for future recertifications.

3.2.1.1.2 Customers That Would Have Received a Recertification Notice on July 1, 2021 or Later

If a customer’s recertification date was unaffected by the customer protections and they would have received a recertification notice on July 1, 2021 or later, this customer will receive a recertification notice on their original schedule. For example, a CARE customer that enrolled in CARE on October 15, 2019 and is not on a fixed income (i.e. recertifies every two years) would receive a 90-day notice on July 15, 2021 and be required to recertify by October 15, 2021 to remain in the program.

3.2.1.1.3 Customers That Are Eligible for Automatic Recertification

PG&E will automatically re-enroll customers that are in the deciles 1 and 2²⁶ for CARE/FERA based on PG&E’s propensity models.²⁷ Customers who are automatically re-enrolled will receive a communication that confirms re-enrollment and provides information on where to find additional financial support programs.

3.2.1.2 Post-Enrollment Verification

PG&E conducts standard and high usage reviews to verify the eligibility of customers enrolled in the CARE and FERA programs. In a standard review, randomly selected customers must submit income documentation²⁸ to PG&E to verify their eligibility. For high usage reviews, a selection of electric customers with energy usage greater than 400% of their electric baseline allowance in their most recent bill must submit income documentation for all adults in the household to verify eligibility *and* participate in ESA within 45 days to remain in the program. electric customers with electric usage above 600% of baseline in any monthly billing cycle receive requests requiring the customer to drop usage below 600% baseline within 90 days, submit official income documentation for all adults living in the household to establish eligibility, and also apply for the ESA program within 45 days. Prior to implementing customer protections, 8% of CARE participants annually received post-enrollment verification requests.

²⁶ PG&E’s CARE propensity model assigns customers a decile score from 1 to 10, with 1 being the most-likely to be CARE-eligible and 10 being the least likely to be CARE-eligible.

²⁷ As required by D.12-08-044 OP 89, basic factors incorporated into the propensity models for recertification selection include: high energy use (including customers with usage above 400% baseline in any monthly billing cycle and above); annual bill amounts; household size; PRIZM or ZIP code; enrollment method; previously indicated customer ineligibility; customers previously de-enrolled from CARE; length of program enrollment; and length of time lapse since previously income verification.

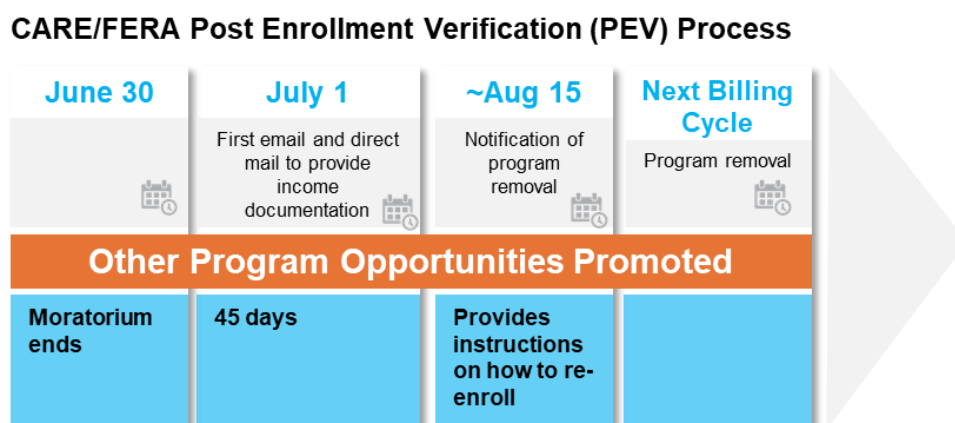
²⁸ See Required Income Document Guide for CARE

https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/EN_income_guide.pdf

PG&E will reinstate both the standard and high usage review processes beginning July 1, 2021. PG&E will include messaging on the reinstatement of these processes as part of its web content and in communications on CARE/FERA recertification.

Participants who are required to complete a PEV will receive a notification requesting income documentation within 45 days. Consistent with our practice prior to the implementation of customer protections, we will conduct PEVs throughout the course of the year (i.e., not all PEVs will occur once the protections expire). However, if a customer receives a PEV request on July 1, 2021, the earliest they could be removed from the CARE program is August 15, 2021 (see Figure 5 below).

Figure 5. Timeline for Earliest Possible Date for CARE Post Enrollment Verification Process



Customers are encouraged to enroll in other assistance programs throughout the process

3.2.2 Relief for Energy Assistance through Community Help (REACH)

For over 30 years, the Relief for Energy Assistance through Community Help program (REACH) has helped low-income families maintain utility service in times of hardship. A non-profit organization administers the REACH program from 170 offices in Northern and Central California.²⁹ REACH helps eligible customers³⁰ pay for energy during a crisis by providing an energy credit of up to \$300 based on the past due bill, subject to funding availability. The program is funded through tax-deductible contributions from PG&E customers and employees.

To help better serve customers impacted by the COVID-19 pandemic, the REACH administrator began providing an additional \$100 in bill payment assistance in March 2020 to all self-identifying impacted income-eligible customers in PG&E's service territory. Thus, COVID-19 impacted income-eligible customers were eligible for an energy credit up to \$400 based on the

²⁹ 2020 Program Reach Sites

https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/REACH-Agencies-by-County-2020.pdf

³⁰ REACH eligibility: 1) Must have a residential account with a utility company in the name of an adult living in the household; 2) Must not have received REACH assistance within the past 12 months; 3) Must not exceed the REACH income guidelines, which are currently 200 percent above the federal poverty guidelines; and 4) Must have received either a 15-day or 48-hour disconnection notice (requirement suspended due to moratorium on disconnections, but will resume on July 1, 2021)

past due bill, subject to funding availability. In 2020, approximately 3,100 customer households participated in REACH.

Beginning July 1, 2021, the additional \$100 for bill payment assistance will no longer be made available to customers. However, subject to availability, customers will still be able to apply to receive a one-time energy credit annually for up to \$300. The REACH administrator will ensure that all marketing, engagement, and outreach efforts reflect the \$300 energy credit. Based on customer participation in REACH in 2020, approximately 250 REACH customers per month will be affected by this change. PG&E will continue to promote awareness of REACH funding after the protections expire to help customers that need bill payment assistance as described in Section 4.

3.3 Medical Baseline Program Customer Protections

The Medical Baseline (MBL) program is an assistance program for residential customers who have special energy needs due to qualifying medical conditions.³¹ In the absence of customer protections, new MBL enrollees must provide certification from a qualified medical practitioner that they meet the eligibility requirements. Customers certified by their qualified medical practitioner that their medical condition is permanent re-certify their eligibility every two years and do not require additional certification from a qualified medical practitioner. However, customers whose medical condition is not permanent must provide certification from a qualified medical practitioner's every two years to remain enrolled in the program.

Due to COVID-19's unique impact on our customers' ability to see their medical practitioners, PG&E voluntarily implemented protections to support MBL customers in March 2020 by pausing all customer removals from the program, no longer sending forms to customers that require them to re-certify through a qualified medical practitioner, and allowing customers to enroll in the program without authorization from a qualified medical practitioner.³² As a result of these measures and additional outreach in support of our Public Safety Power Shutoff (PSPS) program, we have seen program enrollment increase by over 29% since March 2020.

Beginning July 1, 2021, PG&E will lift voluntarily implemented protections for the MBL program:

- New customers enrolling in the program will be required to obtain a certification from a qualified medical practitioner
- Customers who are due for recertification and do not have a permanent disability will receive a 75-day reminder on July 1, 2021 at the earliest;
- Customers who are due for recertification and have a permanent disability will receive a 60-day reminder on July 1, 2021 at the earliest.

³¹ The Medical Baseline Program offers 1) an additional allotment of energy every month at the lowest price available on their rate; and 2) additional notifications in advance of a Public Safety Power Shutoff (PSPS) event.

³² For more information, see PG&E Advice 4227-G/5784-E and supplements.

To help simplify the enrollment and recertification process, PG&E plans to coincide the expiration of customer protections with the launch of a new online medical practitioner portal on July 1, 2021.³³ This new online portal will provide efficiencies to the medical baseline enrollment and recertification processes by reducing the time spent completing required program forms and eliminating the manual back-and-forth process between the customer and their medical practitioner. When customers complete an enrollment/recertification form through this new online portal, they will be sent a conformation email with a web link and a confirmation number that they would share with their medical practitioner. The medical practitioner would use this link and confirmation number to certify their patient's medical needs on PG&E's new medical practitioner portal. Customers would continue to have the option to complete a paper enrollment/recertification form.

As PG&E launches our online medical practitioner portal, we will proactively communicate with healthcare providers, in-home care providers, and medical baseline customers regarding use of the new portal for recertification via emails and content on the PG&E webpage.

Customers who do not recertify will be removed from the MBL program within the next 1-2 billing cycles.³⁴ Accordingly, the earliest that a customer could potentially be removed from the medical baseline program is September 2021 (see

Medical Baseline Portal

PG&E plans to launch a new online medical practitioner portal on July 1, 2021. The portal will enable qualified medical practitioners to certify a customer's eligibility for the MBL program online.

The portal will provide efficiencies by reducing time spent completing paper forms and eliminating the manual back and forth exchange of paper forms between the medical practitioner and customer.

PG&E will proactively communicate with healthcare providers, in-home care providers, and customers regarding use of the new portal via email outreach and content on the PG&E website.

³³ See Advice 3998-G-A/5342-E and supplements.

³⁴ PG&E is committed to ensuring the safety of customers that were previously enrolled in the medical baseline program, but did not recertify themselves in the program during the wildfire season. These customers will continue to receive additional notifications for planned/unplanned outages and PSPS events until the end of the wildfire season. However, they will not be receiving the additional energy allotment or financial benefits after they have been removed from the medical baseline program.

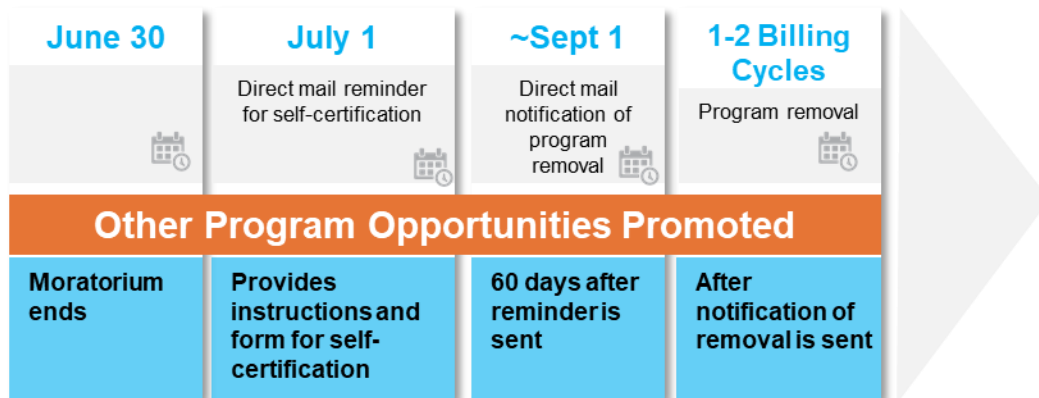
Figure 6). If a customer requires additional time to complete the recertification process, the customer can request a 30-day extension by contacting PG&E. PG&E will follow up directly with the customer within the 30-day extension if no action has been taken.

Figure 6. Timeline for Earliest Possible Date for Medical Baseline Recertification Processes

Medical Baseline Recertification Process Through Medical Practitioner



Medical Baseline Self-certification Process





4 Marketing, Education, and Outreach

PG&E's goal in our marketing, education and outreach (ME&O) efforts is to ease customers through the transition off of the COVID-19 consumer protections by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled (see Appendix A for an overview of available programs to assist customers).

ME&O Objectives

We have set forth the following objectives to guide our efforts:

1. Create early awareness around the expiration of COVID-19 consumer protections
2. Educate customers about the status of their account and resources to help
3. Help get customers out of arrears
4. Enable customers to stay current through ongoing support and financial assistance programs

Key Tenets of our ME&O Efforts

- **Leverage and coordinate with existing ME&O initiatives:** PG&E's customer protections transition plan is built on a foundation of ongoing residential and small business ME&O for income-qualified and other existing programs (e.g., Medical Baseline and Energy Efficiency). We plan to use a variety of channels (e.g., Earned media, targeted email and direct mail, online marketing, social media, phone-based outreach, coordinated outreach with CBO's etc.) to ensure we reach customers via the channels they use and are most comfortable with.
- **Deliver clear, action-oriented messaging:** Our goal is to deliver communications that are easy to understand and give clear direction on how to access our financial assistance and other programs, services, and tools to help them manage their bills. We are sensitive to the fact that many of our customers might find themselves in arrears for the first time, so we want to make sure to communicate early and often about how to find and enroll in payment and financial assistance programs.
- **Pre and Post COVID-19 Transition Customer Communications:** COVID-19 protections transition ME&O focuses on strategies and tactics "pre-transition" (i.e., the time before the COVID-19 consumer protections expire) in Q1 and Q2 of 2021, and during/after the protections expire, Q3 and ongoing. Our pre-transition strategies and tactics center on creating awareness around the expiration, and proactively informing customers about the status of their accounts and the financial assistance programs that are available to help them. Throughout Q1 and Q2 of 2021, PG&E plans to continue this work and add incremental efforts focused on supporting customers with past due balances. During Q3 of 2021 and beyond, we plan to continue ME&O efforts to educate customers and help them get out of arrears and provide them information on programs, tools, and resources to enable them to stay current. Our ME&O campaigns will feature a multi-lingual and multi-channel campaign to drive awareness of impending changes and to facilitate access to support programs and resources, including a centralized 'hub' of information and links to programs.
- **Build off of best practices and lessons learned:** To inform our ME&O plan, we have incorporated best practices and lessons learned from our PSPS customer and



community outreach such as our webinar series, CBO engagement, in-language translations, and media engagement.

4.1 Target Audience

PG&E plans to add emphasis to ongoing efforts to help customers that are past due or struggling to pay bills, as well as customers for whom continuous energy service is essential due to medical or other underlying conditions. PG&E is dividing this target audience into key customer segments using the following criteria:

- **General residential support for customers with past due bills:** As of February 19, 2021, approximately 600,000 residential customers out of a total of 1.1 million past due residential customers fall into this category. This customer population includes many of our residential customers who newly found themselves struggling to pay their bills throughout the pandemic.
- **Current participants in our residential income-qualified programs:** As of February 19, 2021, approximately 46% of our residential customers with past due balances are currently enrolled in either CARE or FERA.
- **Customers needing additional financial assistance and program support:** This includes Medical baseline-enrolled or eligible customers and/or customers that appear to be AMP-eligible due to amount and age of past due accounts.
- **Small business customers:** As of January 2021, approximately 15% of our small business customers have past due balances.

4.2 Key Customer Outreach Messages

In January and February 2021, PG&E conducted customer research and message testing among an audience of XXXX customers. The objective of the research was to test messaging and prioritization of offerings. Initial findings indicate that customers responded well to messaging that is direct, empathetic, and solution oriented. In response to these findings key messages will focus on availability and access to support for customers that are struggling to pay their bills or may be otherwise impacted by the eventual end of COVID-related customer protections.

PG&E will tailor messages to target audiences and customer needs, and eligibility requirements for specific programs. Table 3 provides example messages for our targeted audiences.



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Table 3. Target Audiences Key Messages

	Residential Customers			Small Business Customers
Target Audience	General Residential Support – Not Income Qualified	Financial Assistance – Income Qualified	Emergency Help with Bills – Special Programs	
Key Messages	PG&E is committed to helping customers. We offer bill payment options that can help you better manage your bill.	In these tough times, we're dedicated to serving our customer's needs. Together we can find solutions that work for you.	If you are struggling to pay your energy, we offer special relief and bill assistance programs.	We understand the increasing struggles businesses are facing, and we remain committed to helping you find ways to save energy and money.
Example Programs, Services and/or Tools Marketed	<p>We offer convenient ways to pay:</p> <ol style="list-style-type: none"> Flexible payment arrangements One-time payments Recurring payments Budget Billing <p>Other tools and resources:</p> <ul style="list-style-type: none"> Set up Energy Alerts Find the best Rate Plan option (TOU) 	<p>For customers who qualify, we offer additional ways to save:</p> <ol style="list-style-type: none"> CARE offers a monthly discount of 20% or more on gas and electricity. FERA provides a monthly discount of 18% on electricity only. Must be a household with three or more people. Medical Baseline provides customers with special energy needs a lower rate on their monthly energy bills. ESA provides no-cost energy efficiency measures to help reduce your energy bill. 	<p>To further assist customers facing a possible shutoff, Impacted customers may qualify for:</p> <ol style="list-style-type: none"> LIHEAP AMP REACH <ul style="list-style-type: none"> PG&E will work with our customers to find viable solutions based on their needs. Customers can visit pge.com/financialassistance or contact us at 1-800-743-5000. 	<p>We offer convenient ways to pay:</p> <ol style="list-style-type: none"> Flexible payment arrangements Economic Development Rate (EDR) offers 12%, 18 or 25% discount for qualified businesses that would relocate or expand out of state, or existing businesses that would move out of CA or close their business without the EDR <p>Other tools and resources:</p> <ul style="list-style-type: none"> On-Bill Financing (OBF) for energy efficiency projects Set up Energy Alerts Find the best Rate Plan option (TOU)
Example ME&O Channels Used	<ul style="list-style-type: none"> Website Direct-to-customer mail (e.g., email) Social and other media engagement Outbound calls via CSRs 	<ul style="list-style-type: none"> Website Direct-to-customer mail (e.g., email) Social and other media engagement Outbound calls via CSRs Community partners (e.g., CBOs) 	<ul style="list-style-type: none"> Website Direct-to-customer mail (e.g., email) Social and other media engagement Outbound calls via CSRs Community partners (e.g., CBOs) 	<ul style="list-style-type: none"> Website Social and other media engagement Direct-to-customer mail (e.g., email) Outbound calls via Credit Operations team

4.3 ME&O Campaigns and Activities

Leveraging Our Existing Campaigns and Targeted Outreach

Existing residential and small business campaigns are the foundation of PG&E's customer protections transition plan. Customer digital newsletters, credit and rate campaigns, and marketing and outreach for income-qualified programs (e.g., CARE and ESA) and Medical Baseline have all maintained a steady stream of messaging related to customer programs and support resources. PG&E will leverage these channels to inform customers about the expiration of COVID-19 protections and emphasize financial assistance and energy savings solutions that can help them best manage their bills. We will start communicating timing of the COVID-19 protections expirations as part of our "pre-transition" activities because it is important to provide customers early awareness to minimize surprises. Figure 7 shows an example of one of our pre-transition emails to our small business customers.

For customers past due on their bills, PG&E's goal is to get customers back on track to making payments. Additional campaign elements and messaging will focus on the programs impacted by the end of customer protections to raise awareness and ensure customers understand their options, ideally before the end of customer protections.

It is important to note that the lifting of customer protections would result in numerous operations resuming that have additional timelines and customer outreach plans. For example, a customer that becomes eligible for CARE recertification after June 30, would receive a series of up to six targeted email and direct mail communications over the course of 90 days. For customers facing potential disconnections, there is a process involving numerous communication attempts over the course of more than 60 days. PG&E will coordinate these communications to the extent possible to minimize customer confusion and campaign fatigue, as shown in PG&E understands the importance of coordinated customer communications. We recognize that the timing of the expiration of COVID-19 protections coincides with other important communication campaigns such as our residential TOU transition, PSPS, and emergency preparedness campaigns. We want to avoid overwhelming our customers with too many disparate communications at once. To mitigate this risk, we plan to start our pre-transition communications early to minimize customers receiving an onslaught of information, and we want to bundle messages via existing campaigns and/or channels as shown in Table 4. In addition, we want to ensure that communications are relevant to the audience that receives them. We accomplish this through data-driven targeting. For example, we want to market CARE/FERA opportunities to pre-qualified customers who have a high likelihood of eligibility.

Figure 7. Early Outreach to our Small Business Customers





Through coordination of existing campaigns, PG&E plans to communicate our financial assistance programs such as payment plan options for eligible customers, bill discount programs like CARE and FERA, energy savings opportunities like the Home Energy Checkup, and other tools and resources that help our customers manage their bills like bill alerts. In addition, PG&E plans to incorporate messaging for complementary financial assistance programs such as LIHEAP and REACH that may help customers reduce overall household expenses. PG&E also plans to work with our network of CBOs and community partners to help educate customers and keep them informed about the transition and program offerings. PG&E describes how we plan to leverage CBOs in Section 4.5.2. PG&E's financial assistance, energy savings and other support services are described in Appendix A – Solutions and Support for our Customers During the Transition. PG&E will leverage our full portfolio of programs to support our customers and help get them back on track.

Our Customer Service Representatives Provide Targeted and Proactive Outreach

In addition to our traditional marketing campaigns, PG&E's team of Customer Service Representatives (CSRs) and Credit Operation leads have been proactively calling customers who are behind on their bills to inform them about ways we can help them manage their bills, including enrolling/referring them to bill assistance programs. PG&E plans to continue to use our customer representatives to make these outbound calls to residential and small business customers pre-transition and after the COVID-19 protections expire.

General Awareness Strategies

PG&E recognizes the need to offer general awareness about the expiration of COVID-19 protections and the array of financial support and other programs we offer to support our customers. To this end, PG&E plans the following activities that we will execute as part of our "pre-transition" activities, as shown in Table 4:

- **Dedicated Webpage:** PG&E plans to create a centralized 'hub' of information and links to programs, modeled after our COVID-19 protections webpage³⁵ to make it easy for customers to access the information that they need on their terms.
- **Social Media:** PG&E uses social media, including Facebook,³⁶ Twitter,³⁷ Nextdoor³⁸ and Instagram to share important information, such as the timing of COVID-19 protections expiration. We also use these platforms to share program information and post key messages from news releases. PG&E plans to continue to use our social media platforms as a way to reach our customers.
- **Media Engagement:** PG&E plans to work closely with external media outlets, including both paid and earned media, to provide awareness about our financial assistance and energy savings programs. For example, NBC Bay Area (KNTV) featured the CARE, FERA and LIHEAP programs, providing customers with helpful information about how to apply. PG&E will also leverage our partnerships with multicultural media organizations to share information about our transition plan activities.

³⁵ www.pge.com/covid19

³⁶ www.facebook.com/pacificgasandelectric

³⁷ www.twitter.com/PGE4Me

³⁸ www.nextdoor.com/agency-detail/ca/san-francisco/pacific-gas-and-electric-company-13



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4.3.1.1 Tactical Plan







PG&E understands the importance of coordinated customer communications. We recognize that the timing of the expiration of COVID-19 protections coincides with other important communication campaigns such as our residential TOU transition, PSPS, and emergency preparedness campaigns. We want to avoid overwhelming our customers with too many disparate communications at once. To mitigate this risk, we plan to start our pre-transition communications early to minimize customers receiving an onslaught of information, and we want to bundle messages via existing campaigns and/or channels as shown in Table 4. In addition, we want to ensure that communications are relevant to the audience that receives them. We accomplish this through data-driven targeting. For example, we want to market CARE/FERA opportunities to pre-qualified customers who have a high likelihood of eligibility.



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Table 4. DRAFT COVID-19 Consumer Protections Transition Marketing and Communication Calendar

[This DRAFT Communication Calendar is illustrative only. PG&E will provide an updated calendar in the final filing.]

Communication Channels	January	February	March	April	May	June	After COVID-19 Protections End
 PG&E Residential Newsletter	Online Account	Rate Plan Options	Home Energy Checkup	Transition Plan Update	Customer Resources to help them through Transition (e.g., financial assistance programs)	Medical Baseline Portal and Protections Update	Safety, Energy Efficiency Program Support, and Financial Assistance
 PG&E B2B Digital Newsletter				Transition Plan Update	Customer Resources to help them through Transition (e.g., financial assistance programs)	Protections Update	Safety, Energy Efficiency Program Support, and Financial Assistance
 Digital Media	CARE, FERA, ESA, LIHEAP, B2B			CARE, FERA, ESA, MBL, B2B, TOU, PSPS Awareness	CARE, FERA, ESA, Customer Financial Assistance and Program Support campaign		CARE, FERA, ESA, TOU
 Radio	CARE, FERA, ESA	CARE, FERA, ESA, Winter Gas Safety	CARE, FERA, ESA	CARE, FERA, ESA	CARE, FERA, ESA	CARE, FERA, ESA	CARE, FERA, ESA
 Social Media	Safety, Seasonal Savings, news and events	Safety, Seasonal Savings, news and events	Safety, Seasonal Savings, news and events	Transition Plan Update	Launch Customer Support to help them through Transition	Protections Update	PSPS, MBL renewal, Customer Support, Seasonal TOU Savings
 Community Based Organization Outreach	CARE, FERA, ESA, MBL, PSPS		CARE, FERA, ESA, MBL, PSPS	CARE, FERA, ESA, MBL, PSPS	CARE, FERA, ESA, MBL, PSPS	CARE, FERA, ESA, MBL, PSPS	Income Guidelines Updates, Customer Protections
							PSPS, CARE, FERA recertification and enrollment



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Communication Channels		January	February	March	April	May	June	After COVID-19 Protections End
 Website - pge.com			Update COVID-19 Support page (ADD and Customer Protections)	AMP, LIHEAP, REACH page updates	Transition Plan and customer protections content updates	Launch Financial Assistance and Customer Support Page	Homepage promotion	Continued promotion of customer support page, PSPS, TOU resources
 Earned Media			Customer Protections Extended	TBD	Transition Plan	Launch Financial Assistance and Customer Support Page and Resources	TBD	TBD
 PG&E Bill Packet		Winter Savings Tips	LIHEAP Insert	LIHEAP Insert	LIHEAP/ESA Insert	COVID-19 Protections expirations	TBD	TBD
 Proactive Outbound Outreach		"Pre-Transition" Proactive outbound calls to Res & Small Business	"Pre-Transition" Small Business Letter re: bill payment support	"Pre-Transition" Small Business Email re: bill payment support	"Pre-Transition" Proactive outbound calls to Res & Small Business			Customer outreach continues



Overview of Tactical Plan

PG&E describes the communication channels in its tactical plan (Table 4) in further detail below. PG&E coordinates these channels across multiple campaigns. In addition, tactics such as newsletters, pge.com web content, and CBO Outreach are integrated, meaning that the mix of messages will vary at any given time and that multiple programs or topics may be covered by a single communication. This enables us to minimize “campaign fatigue” and overwhelming our customers with too many communications

- **PG&E Residential Newsletter:** Distributed monthly to more than 3.7 Million customers. We will use this tactic to drive awareness of the COVID-19 protections transition and programs we have to help them manage their bills.
- **PG&E Business to Business (B2B) Digital Newsletter:** Distributed monthly to more than 100,000 non-residential customers, the vast majority of whom are small businesses. Similar to our Residential Newsletter, this tactic helps us drive awareness of the expiration of the protections, and financial assistance and other programs.
- **Digital Media:** Online advertising campaigns which use a combination of search engine marketing, display advertising, site-specific promotions, sponsored content, etc. We use this tactic to drive awareness on important issues like PSPS, and inform customers about the types as programs and services.
- **Radio:** Pre-produced advertising and on-air reading of scripted content. Includes multi-cultural stations. This tactic is helpful in reaching a broad array of our harder-to-reach customers and inform them about helpful financial assistance programs.
- **Social Media:** PG&E posted content on social channels – Twitter, Facebook, Instagram and Nextdoor and advertises or amplifies certain posts based on timing and message relevance. This tactic is useful to highlight important dates and events like our transition plan.
- **CBO Outreach:** Campaign support for community partners ranges from sharing of social content mentioned above, to print and online collateral, to event support and local community engagement. CBOs are key to our strategy to ensure our customers and communities understand the timing for the expiration of the COVID-19 protections and driving awareness about the financial assistance programs available to our customers and their constituents.
- **Website:** www.pge.com – PG&E currently has pages dedicated to COVID-19 Support and over time, plans to shift messaging to more directly focus on customer protections and closely related financial assistance and support programs. We plan to use our website as the centralized “hub” of information on the COVID-19 protections transition.
- **Earned Media:** PG&E’s Media representatives and Communications team work with media outlets and multi-cultural media to secure placement of stories. This tactic is helpful to drive broad awareness across customers, communities, and interested stakeholders.
- **PG&E Bill Packet:** PG&E communicates key information on the exterior envelope (not seen by a customer that receives their bill electronically), bill messages on the bill itself, and through inserts packaged with customers’ monthly billing statement. We will use this tactic to update our customers on the expiration of the COVID-19 protections.



4.4 Accessibility and Translated Outreach Materials

PG&E plans to use our Access and Functional Needs (AFN) Plan for Public Safety Power Shutoff Support PSPS³⁹ as a model for customer protections transition communications.

PG&E plans to adopt a similar tiered structure to what we use for the Community Wildfire Safety Program outreach for prioritizing and streamlining criteria for translation of customer protections transition communications.⁴⁰

- Tier 1: Fully Translated Critical Collateral and Reference Information
- Tier 2: Language Support Module
- Tier 3: Small-Space Language Support Module

PG&E also offers customers materials in alternative formats such as braille, large print, and audio. PG&E remains committed to the continuous improvement of our websites to better meet the diverse needs of our customers. For example, we will ensure compliance with WCAG 2.0 standards as we launch new features and functionality to pge.com/covid19, and eventually pivot the messaging on the page to transition and post-transition messaging. We also seek to improve the customer experience with user testing for key components.

In addition, PG&E plans to engage with the media, including multi-cultural news organizations and press releases, issuing radio spot advertisements, and participating in media interviews. In turn, these media organizations may provide communications on the radio, broadcast, tv, and online.

Furthermore, we provide more detail in Section 4.5.2 below on how we will engage and partner with CBOs to share information with their consumers. As it becomes safe for CBOs, PG&E employees, and customers to gather in-person, PG&E intends to reach out to organizers and consider hosted events. Virtual events and social media collaboration will be explored as alternative channels.

4.5 Coordination with External Partners

PG&E believes that effective collaboration and coordination with external partners is critical to effectively supporting our customers. This includes consulting a diverse range of stakeholders, listening to constructive feedback, and leveraging resources for maximum impact. PG&E describes its efforts to coordinate with external partners in further detail below.

4.5.1 Local, State, Federal and Tribal Government Engagement

PG&E understands that the pandemic has placed a significant strain on governmental agencies to meet the needs of their constituents. To this end, PG&E will continue to share information on available assistance programs with local governments, including the AMP, and local service providers (LSPs) that support LIHEAP. PG&E worked with California Department of Community Services and Development (CSD) and LIHEAP agencies to explore options for improved coordination, and describes the outcomes in Section 6.

In addition, PG&E will continue to explore opportunities to partner with government agencies that are looking for ways to distribute funding (federal/state, charitable, etc.) to support customers impacted by the pandemic. PG&E is aware of approximately 22 counties and 8 cities

³⁹ Phase 2 De-Energization Decision (D.) 20-05-051, Pacific Gas and Electric Company Access and Functional Needs (AFN Plan).

⁴⁰ See PG&E's 2021 Wildfire Mitigation Plan, Section 8.4.3, pp.923-927



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are eligible for CARES Act funding. PG&E has initially been contacted by Placer County and the cities of Sacramento and Fresno to identify qualifying customers and determine opportunities to apply funding to these customers that have outstanding balances owed to PG&E. PG&E is planning proactive outreach to remaining local governments to share the process we have established to allocated CARES Act funding.

In addition to the local, state and federal government engagement, PG&E plans to work with tribal governments to prepare their communities for the expiration of COVID-19 protections and seek feedback and input on opportunities to best support these communities.

4.5.2 Community-Based Organizations

PG&E recognizes the important roles that CBOs play in the community because of their established relationships and ability to serve as trusted communication channels to customers. We know talking about financial hardships can be hard for many customers, and many do not want to share their challenges with people outside of their community. That is why CBOs will play a critical role in ensuring customers understand the timing of the COVID-19 protections transition, the various assistance programs and/or services we offer, and which programs and/or services would work best for them.

PG&E is actively engaged with a multitude of CBOs that provide education and awareness information to customers through a variety of channels, including the 250 CBOs who support information dispersal and resource provisioning related to PSPS events, another 40 CBOs that serve PG&E's income-qualified programs and the 25 CBOs that are contracted for various activities supporting rate awareness related to the TOU transition in communities. PG&E coordinates with CBOs that have existing relationships and serve disadvantaged and/or hard-to-reach communities to conduct outreach to customers proactively and/or communicate with customers to provide in-language/translated education.

PG&E is also investing resources in developing a broad strategy to improve its engagement with CBOs across program areas. Current activities include implementing a new database and tracking tool to manage CBO communications, and forming a cross-functional team to coordinate increasing CBO involvement in multiple programs and proceedings. PG&E anticipates implementing the bulk of its CBO engagement strategy and CBO database in the first half of 2021, and that these investments will have positive multiplier benefits in improving coordination and outcomes with its growing CBO network.

Through these partnerships, CBOs will help amplify our COVID-19 protections transition messaging and share relevant updates with their constituents. PG&E plans to work with our CBO network to help engage our customers by:

- Conducting bi-annual trainings with contractors that serve PG&E's customers in the CARE program, which include information on relevant PG&E programs, including our financial assistance programs, so the contractors can assist with educating their clientele throughout the year;
 - Specifically, PG&E hosted a one-off training session in January 2021 to prepare CBOs for the Arrearage Management Program (AMP) launch, and will incorporate comprehensive information about AMP and all of the COVID-19 protections transitions into its first 2021 CBO training, to be hosted on March 31, 2021.
- Providing financial assistance program and services literature for sharing through CBO



- communication channels and ESA contractor networks; and
- Providing presentations and representation at CBO-hosted webinars or online events.

PG&E will continue to collaborate with our CBO network before, during and after the transition period to ensure they have the resources they need to best support our customers.

4.5.3 Community Choice Aggregators

PG&E met with the CCAs on February 19, 2021 to discuss PG&E's preliminary plans to support residential and small business customers in light of the expiration of customer protections on June 30, 2021, and how CCAs could support the transition.⁴¹ The purpose of the meeting was to provide an update on our plans to support customers during the transition from customer protections, seek feedback on additional opportunities to support customers based on what CCAs are hearing and seeing, and discuss opportunities to align on customer engagement during the transition. During the meeting, PG&E received feedback from the CCAs on opportunities to partner with CBOs (e.g. food banks) and local government agencies, such as social service agencies. PG&E describes its coordination with CBOs in Section 4.5.2 above.

4.5.4 Water Agencies⁴²

PG&E understands that increasing the frequency of data exchanges with the water utilities can improve the reach and effectiveness of their customer assistance efforts. PG&E supports increasing the frequency of these exchanges and will continue to coordinate with water agencies throughout the transition to support a smooth transition for our customers.

5 Operational Support and Training

PG&E trains our call center staff to ensure that they can provide information to customers on relevant assistance programs.⁴³ PG&E's customer service representatives (CSRs) are the voice of our company. They must be clear and confident communicators who have a constant focus on safety and the customer at all times. CSRs provide front-line support to our customers by telephone, email, and written correspondence. Once COVID-19 protections expire, PG&E anticipates that the resumption of normal business activities will substantially increase call volume to our call center. To ensure our CSRs understand these changes and have the right information and tools to best support our customers, PG&E will provide robust virtual training to all our CSRs throughout June 2021⁴⁴. Our Customer Service Operations Support Communication team will also develop a detailed

PG&E's Contact Center Objectives

The ultimate customer experience is the singular goal and objective of PG&E's call center. We strive to gain our customers' trust, one phone call at a time by:

1. Aiming to provide first-call satisfaction
2. Providing energy and money saving tools for our customers
3. Using our survey scores to find new methods to enhance the customer experience
4. Partnering with our PG&E colleagues to ensure customer satisfaction

⁴¹ Resolution M-4842, p. 5.

⁴² Resolution M-4849 encourages PG&E to consider increasing the frequency with which we exchange data on accounts enrolled in income-eligible programs so that eligible customers can be targeted for enrollment. Resolution M-4849, p. 13.

⁴³ Resolution M-4849, p. 13.

⁴⁴ PG&E will conduct all activities safely and in compliance with all appropriate state and local health orders. To ensure the safety of our employees and compliance with state and local COVID-19 health



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communication plan to promote and reinforce the tools and resources our CSRs can use during discussions with our customers. Our training and communication plan will prepare our employees to provide meaningful support to customers, who are experiencing financial difficulty and/or hardship.

PG&E recognizes that customers may have differing priorities and challenges to address during these unprecedented times. PG&E is focused on tailoring our engagement efforts to address the needs of each individual customer. PG&E's CSRs have been trained to work with customers to provide customers with multiple options to address issues they may face as COVID-19 customer protections are lifted. Messaging will be tailored to customer needs and eligibility requirements for specific programs. Table 5 describes the example messaging CSRs use to offer programs/services.

orders, PG&E will conduct virtual trainings with CSRs until it is safe to begin conducting in-person trainings.

Table 5. Example messaging CSRs use to offer programs/services

Target Audience	General Support – Not Income Qualified	Financial Assistance – Income Qualified	Emergency Help with Bills – Special Programs (LIHEAP, AMP, REACH)
Key Messages	PG&E is committed to helping customers. We offer bill payment options that can help you better manage your bill.	In these tough times, we're dedicated to serving our customer's needs. Together we can find solutions that work for you.	If you are struggling to pay your energy, we offer special relief and bill assistance programs.
Support Statements	<ul style="list-style-type: none"> PG&E is providing advance notice to customers who are past due that existing shutoff protections will be ending but help is available to assist with the transition. We offer convenient ways to pay: <ol style="list-style-type: none"> Flexible payment arrangements One-time payments Recurring payments Budget Billing Take advantage of our tools and resources: <ul style="list-style-type: none"> Set up Energy Alerts Find the best Rate Plan option (TOU) Customers can visit pge.com/billhelp or call us at 1-800-743-5000. 	<p>For customers who qualify, we offer additional ways to save:</p> <ol style="list-style-type: none"> California Alternative Rates for Energy Program (CARE) offers a monthly discount of 20% or more on gas and electricity. Family Electric Rate Assistance Program (FERA) provides a monthly discount of 18% on electricity only. Must be a household with three or more people. Medical Baseline provides customers with special energy needs a lower rate on their monthly energy bills. <ul style="list-style-type: none"> Customers who are past due will still be responsible for their entire bill amount, but they can qualify for bill savings and defer payments without worry. 	<ul style="list-style-type: none"> To further assist customers facing a possible shutoff, PG&E will be offering eligible customers additional help. Impacted customers may qualify for: <ol style="list-style-type: none"> LIHEAP AMP REACH Disconnecting service is a last resort. We want to work with customers to set up pay plans and enroll them in our bill assistance programs. PG&E will work with our customers to find viable solutions based on their needs. Customers can visit pge.com/financialassistance or contact us at 1-800-743-5000.



Resolution M-4849 encourages PG&E to consider the appropriate method of customer communication, including non-English languages and forms for communication to reach people with disabilities and other access and functional needs.⁴⁵ PG&E's Contact Center offers accessibility and translation services and is equipped to provide translation support in over 250 languages. PG&E also offers customers materials in alternative formats such as braille, large print, and audio. Our CSRs are committed to putting in the time to ensure customers are informed and educated about all of their options for bill relief or bill management.

In addition to our CSRs, PG&E provides support to our small business customers through unassigned small business advisors. We train our advisors on a biannual basis through Customer Relationship Management (CRM) Essentials. In May 2021, PG&E's unassigned small business advisors will be trained on existing solutions and on any new solutions that will be launched to help address the challenges our small business customers are seeing due to COVID-19.

6 Stakeholder Feedback on Our Transition Plan

PG&E recognizes the critical role that community-based organizations (CBOs) play in connecting with our customers, particularly those that are harder to reach, such as customers with disabilities and communities of color. As a result, we organized a CBO and agency focus group in January 2021 to better understand CBO and agency outreach efforts in Q1/Q2 2021 and identify opportunities to integrate COVID-19 protections information into those efforts. PG&E hosted the CBO/agency focus group on January 27, 2021 and over 40 external stakeholders attended, including 15 LIHEAP providers, two organizations representing customers with disabilities, multiple members of the Low-income Oversight Board, as well as representatives from the CPUC and CSD. During the focus group, we solicited feedback from the CBOs and agencies on what our top priorities should be in supporting customers during the transition and what else we should do to support our customers. From this conversation, we received constructive feedback on how to improve coordination with LIHEAP providers, the need for clear and direct information (i.e. clarifying the consequences of not paying the bill), and general suggestions for methods of communication and outreach, as summarized in

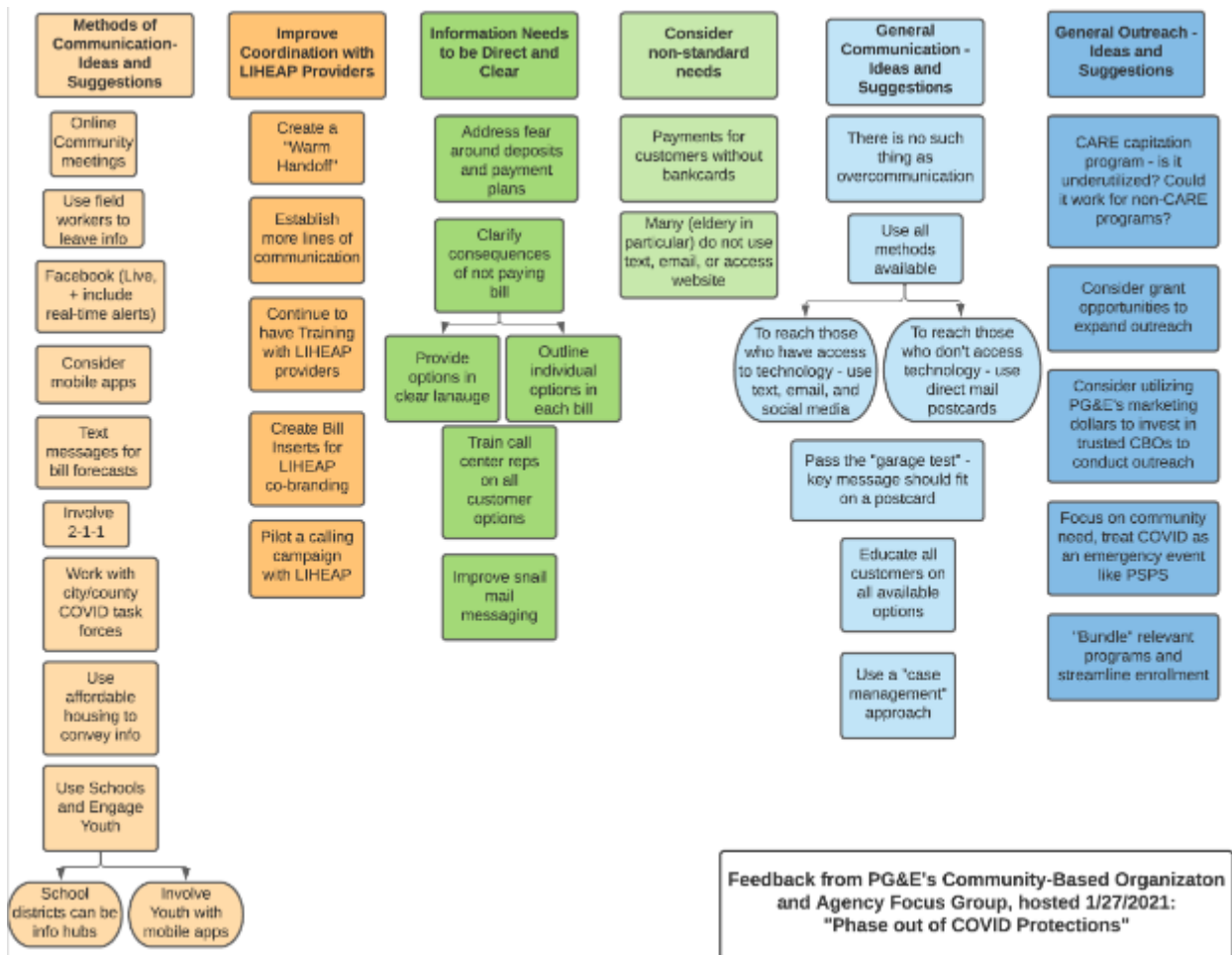
⁴⁵ Resolution M-4849, p. 13.



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Figure 8, below.

Figure 8. Summary of Feedback from CBO and Agency Focus Group



PG&E solicited other feedback from CBOs and community members. For example, we organized a focus group with the People with Disabilities and Aging Advisory Council (PWDAAC) members and other organizations representing customers with access and functional needs (AFN) on February 26, 2021. The PWDAAC feedback focused on [insert summary from meeting](#).

PG&E also gleaned insights from the Low-Income Oversight Board (LIOB) meeting on March 11, 2021. This feedback included [insert summary from meeting once final](#).

In January 2021, we conducted research with our small and medium-sized business (SMB) customers who are members of our Business Advisory Forum (an SMB online community) to get a better understanding of the multitude of effects the COVID-19 pandemic has had on them, and to identify customers who would be interested in talking with us further about how they prioritize their bills, and what support they would like from PG&E. Based on this research, we are conducted four small focus groups. Through the focus groups we learned [insert summary from meetings once final](#).

Based on the feedback, PG&E has committed to [insert ideas once final](#) as short-term opportunities. We believe [insert ideas once final](#) are more appropriate as long-term solutions and commits to addressing these throughout 2021 and 2022.



7 Benchmarking With Other Utilities and Research

In developing our transition plan, PG&E considered best practices and lessons learned from utilities and industry leaders throughout the U.S. For many non-California utilities, disconnection moratoriums and other consumer protections ended in 2020. With such high numbers of customers behind on their bills, many of these utilities needed to adjust their collections and assistance strategies as they moved out of disconnection moratoriums. For example, Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company (Ohio Companies) recognized the importance of early communications to prepare their customers and set forth a milestone of notifying customers 21 days prior to the resumption of disconnections.⁴⁶ PG&E is following a similar practice of early communications, driving broad awareness of the transition starting Q1 of 2021. Further, the Ohio Companies leveraged a multi-channel approach as part of their communications plan.⁴⁷ PG&E's ME&O plan features multiple channels to ensure our customers and communities are aware of the timing of the COVID-19 protections expirations, and have clear information about the programs and resources we have to help them throughout this transition.

BC Hydro and Austin Energy found it challenging to reach customers during moratoriums. Customers who received a disconnect notice had more incentive and urgency to reach out to the utility to enroll in a payment arrangement than customers who did not receive a notice. While neither found a specific communication channel to be particularly effective, both proactively reached out to customers in new ways. They took advantage of low call center volumes and had agents proactively call customers who were behind on bills.⁴⁸ PG&E has taken a similar approach in leveraging our CSRs who perform proactive outbound calls to our residential and small business customers, as discussed in detail in Section 3.1.1.

Findings from the 2020 E Source COVID-19 Residential Survey suggest that offering bill-relief programs, combine them with energy-saving programs to help customers adopt energy-saving behaviors. The study notes that many of our customers who have lost income because of the pandemic need financial help for the first time. The need is greater to message bill-relief programs to all your customers, not just the historically low-income ones. Findings recommend communicating regularly about who qualifies for billing programs and how to apply. Other recommendations included combining bill-relief programs with energy saving programs to help customers adopt energy saving behaviors. E Source's research suggests that customers appreciate utilities promoting flexible pay plans and offering tools to control their bill such as budget billing payment alerts.⁴⁹ We are taking a similar approach with our communications as highlighted in Section 4.

Utilities found creative ways to reach their customers and inform them of financial assistance options. For example, National Grid and Eversource hosted multi-lingual web conferences, and Austin Energy used its community partnerships to help get customers assistance in a holistic way. Similarly, PG&E plans to leverage our network of CBOs, as trusted members of their communities, to drive awareness of our financial assistance offerings.

⁴⁶ Transition Plan and Request for Waivers of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company. p.4

⁴⁷ Ibid, p.8

⁴⁸ "Shutoff moratoriums are ending—now what?." E Source, December 2020.

⁴⁹ E Source, 2020 COVID 19 Residential Survey.



Providing customers with clear information on how they can get assistance through LIHEAP was an important strategy for many utilities as many customers are seeking this kind of assistance for the first time. For example, PPL promoted LIHEAP on its website with a link to the online application, a downloadable application, and contact information for local assistance offices.⁵⁰ Like PPL, we recognize the value of helping our customers understand the financial assistance that LIHEAP can offer, and have a dedicated webpage with information on the program and links to help customers access funding. Promoting LIHEAP is an important feature of our transition plan.

8 Program Metrics

Resolution M-4849 requires PG&E to include a plan for reporting metrics on activities in the timeline, and present metrics we will track and report to monitor success in achieving the goal of effectively easing customers through the transition.⁵¹ Specifically, the Commission requires PG&E to include a progress metric for each of the following areas:

- Customers that enrolled in a bill assistance program when protections were in place are successful in sustaining their enrollment in the program if they still meet eligibility criteria
- New enrollments of impacted customers in payment programs since beginning implementation of the transition plan.

Table 6 provides an overview of PG&E's proposed metrics and methodology. The methodology for these metrics leverages existing approaches in place to provide this data in other proceedings (e.g. CARE/FERA program enrollments). PG&E will include baseline data and the first month of data for each metric in the monthly reports required in R.18-07-005.

Table 6. Transition Plan Metrics and Methodology

Progress Metric	Methodology
Customer retention post June 30, 2021	
<ul style="list-style-type: none"> • Percentage of customers that complete re-certification for <ul style="list-style-type: none"> ○ CARE ○ FERA ○ Medical baseline program • Percentage of customers that complete post-enrollment verification for <ul style="list-style-type: none"> ○ CARE ○ FERA 	[to be completed prior to filing]
Enrollments of impacted customers in new programs	
<ul style="list-style-type: none"> • Number of new monthly enrollments/participation in income-qualified programs <ul style="list-style-type: none"> ○ CARE ○ FERA ○ LIHEAP and REACH 	[to be completed prior to filing]
<ul style="list-style-type: none"> • Number of new enrollments in Medical baseline program 	
<ul style="list-style-type: none"> • Number of customers enrolled in AMP • Number enrolled as a percentage of total customers eligible for AMP 	
<ul style="list-style-type: none"> • Number of small business customers with payment arrangements 	

⁵⁰ "Help your customers get LIHEAP benefits during COVID-19." E Source, May 2020

⁵¹ Resolution M-4849, p. 15.

9 Budget

Resolution M-4849 encourages PG&E to use existing ME&O budgets to the extent practicable to implement its transition plan.⁵² To the extent that PG&E believes that it cannot leverage only existing ME&O budgets, Resolution M-4849 directs PG&E to note the cost estimate, describe details of the incremental new activity, and use the CPPMA to record and track incremental costs associated with transition plan implementation.⁵³

At this time, PG&E anticipates that it can complete the required ME&O as described herein through existing budgets and does not forecast incurring incremental costs for these activities.

10 Statewide IOU Coordination

Resolution M-4849 explains that statewide consistency in administering the transition plans is critical for the following reasons:⁵⁴

1. Eases confusion and/or increases efficiencies for customer facing entities supporting IOUs in executing the ME&O strategy
2. Reduces challenges for call centers receiving customers reports from customers across multiple utilities; and
3. Eases processing and interactions between regulators and utilities as utilities report on their implementation of the plan.

To this end, PG&E met with the other large investor-owned utilities (IOUs), small municipal utilities, and water utilities on a weekly basis to evaluate potential areas for consistency and best practice sharing. As a result of these meetings, we aligned with the other IOUs on the following key elements of our transition plan:

[TBD—to be completed prior to filing]

11 Compliance and Safety

Resolution M-4849 requires PG&E to provide the following information in support of compliance and safety:

- An explanation of how the transition plan aligns with program enrollment targets, eligibility requirements, and customer protections in effect outside emergency customer protections;
- The number and percentage of unique customers (by zip code) who are more than 90 days in arrears, or not enrolled in a payment plan, or have more than \$250 in total arrears; and
- A discussion of how the transition plan ensures that activities are safe and consistent with all appropriate state and local health orders.

PG&E discusses these issues in further detail below.

11.1 Alignment with Other Program Targets and Requirements

PG&E recognizes that the customer protections are cross-cutting and impact a number of customer programs and proceedings. To this point, Resolution M-4849 emphasizes the importance of the IOUs explaining how their transition plans align with program enrollment targets, eligibility requirements, and customer protections in effect outside the emergency

⁵² Resolution M-4849, p. 17.

⁵³ Resolution M-4849, p. 17.

⁵⁴ Resolution M-4849, pp. 13-14.



customer protections. PG&E is committed to continuing to meet all related regulatory compliance requirements, which includes but is not limited to:

- Continuing to increase penetration of CARE/FERA enrollments;
- Conducting CARE/FERA post enrollment verification as applicable;
- Complying with all disconnection policies identified in D.20-06-003, including not exceeding the disconnection cap;
- Providing an online LIHEAP pledge portal by March 2021;⁵⁵
- Launching a new online portal that enables qualified medical practitioners to e-sign Medical Baseline applications;⁵⁶ and
- Offering training to county health works that conduct in-home visits prior to Q2 2021⁵⁷

11.2 Data

See Appendix A [TBD—to be completed prior to filing] for the number and percentage of unique customers (by zip code) who are more than 90 days in arrears, or not enrolled in a payment plan, or have more than \$250 in total arrears.

11.3 Alignment with State and Local Health Orders

PG&E will conduct all activities safely and in compliance with all appropriate state and local health orders. This includes ensuring that all PG&E employees interacting with customers follow applicable health orders such as wearing a face covering and social distancing.

PG&E's customer service offices are currently closed in compliance with state and local safety protocols for COVID-19. To ensure the safety of our customers and employees and compliance with state and local COVID-19 health orders, PG&E's offices will remain closed until they are permitted to be reopened. PG&E will continue to encourage customers to utilize other payment options and provide assistance accessing payment options as needed. PG&E offers the following convenient payment methods:

- **Automatic Payments:** Customers can sign up for recurring payments. Utility bills are automatically paid from a credit card, debit card, or bank account. Customers can set start and stop dates for recurring payments and a maximum payment amount.
- **Pay Online:** Customers can pay online as a registered user or as a one-time user with no registration required.
- **Pay by Phone:** Customers can call 1-877-704-8470 to pay their utility bill.
- **Pay by Mail:** Customers can pay by mail by making their check payable to PG&E and sending it along with their energy statement remittance stub to PG&E P.O. Box 997300, Sacramento, CA 95899-7300.
- **Pay in Person:** Customers can pay at a neighborhood payment center⁵⁸.

⁵⁵ D.20-06-003, OP 27.

⁵⁶ D.20-06-003, OP 36.

⁵⁷ D.20-06-003, OP 37.

⁵⁸ PG&E offices are temporarily closed. Neighborhood payment centers may be open. Customers can locate a payment center using PG&E's Payment Center Locator: https://www.pge.com/en_US/residential/your-account/your-bill/ways-to-pay/pay-center-locator/pay-center-locator.page.



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Virtually all customers (98%) are currently paying or say they would be able to pay their PG&E bill by an alternative method other than in-person at a local customer service office.

In addition, PG&E will continue to implement virtual options for customers to limit contact with individuals outside their household. For example, as discussed in Section 3.3, PG&E is launching an online portal that will enable customers to obtain authorization from a qualified medical practitioner to enroll in or re-certify eligibility in the Medical Baseline program without an in-person visit. In addition, PG&E will continue to conduct trainings virtually with its community outreach contractors and other CBO partners to inform them of program eligibility requirements and other relevant information.

PG&E will monitor developments and governmental directives and they reserve the right, in consultation with Staff, to postpone implementation of some or all of the provisions of this Plan as necessary to ensure the safety of employees, customers, and the general public.

12 Conclusion

PG&E will continue to ensure that all customers are aware of and prepared for the end of COVID-19 consumer protections. PG&E will continue to listen to our customers and community partners, soliciting feedback to enhance communications and resources throughout the year.

Appendix A – Solutions and Support for our Customers During the Transition

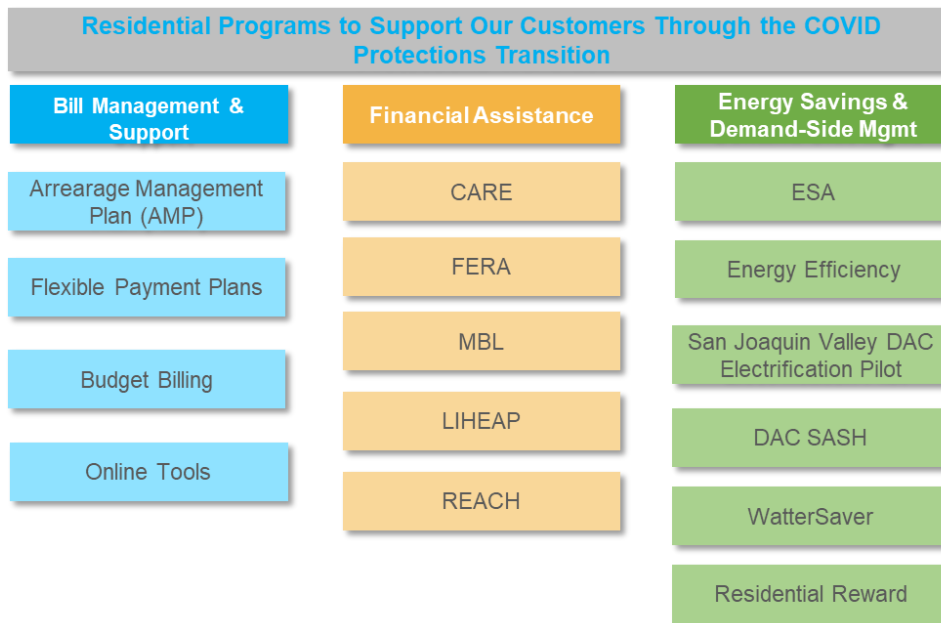
We recognize that higher energy bills coupled with the economic impacts of the pandemic have made it more difficult for our customers to pay their bills. We are empathetic to the increasing struggles our customers may be facing and are committed to helping our customers by providing them with the right type of assistance based on their needs and circumstances. PG&E provides more information about how it will increase customer awareness of these opportunities in its ME&O plan in Section 4 and describes these offerings in further detail below.

1. Residential Customers

Figure 9 identifies the three types of programs that we will be promoting to customers as they transition off customer protections. This includes:

- **Bill management and support programs** that help customers manage the amount that they are required to pay on their monthly bills;
- **Financial assistance programs** that provide income-based bill discounts and additional funding to help customers pay their bills; and
- **Energy savings and demand-side management programs** that help customers reduce their energy bills by using less energy.

Figure 9. PG&E Residential Customer Programs





a. Bill Management and Service Support

PG&E has a suite of bill management and support services available that can help customers manage their monthly billing amounts, including paying off any unpaid bills that may have accumulated since the onset of the pandemic.

Arrearage Management Plan

PG&E launched the AMP program on February 1, 2021 to help customers reduce and/or eliminate their past due balances. Each time a participating customer pays their current monthly charges on time, PG&E will forgive 1/12 of their outstanding debt. After twelve on-time payments, PG&E will have forgiven all of their past due balances (up to \$8,000 per year).

To qualify for AMP, customers must meet the following criteria:

- Enrolled in CARE or FERA;
- Owe \geq \$500 on their gas and electric bill *or* \geq \$250 on their gas bill (gas only customers);
- Part of their debt is more than 90 days past due;
- Be a PG&E customer for at least 6 months; and
- Have made at least one on-time payment.

PG&E provides additional information about the AMP on its website (including FAQs) and will offer eligible customers the opportunity to enroll in the program if they contact PG&E for any reason.

Flexible Payment Plans

As described in Section 3.1, PG&E offers flexible payment plans to help customers spread their past due balances over an extended period of time to help address temporary financial strains. PG&E offers all residential customers a 12-month payment plan and will not disconnect any customer that is current on their 12-month payment plan. In addition, PG&E will continue to offer small businesses a 12-month payment plan for the remainder of 2021. PG&E will continue to provide information about payment plan options as part of its ME&O prior to and after the expiration of protections.

Budget Billing

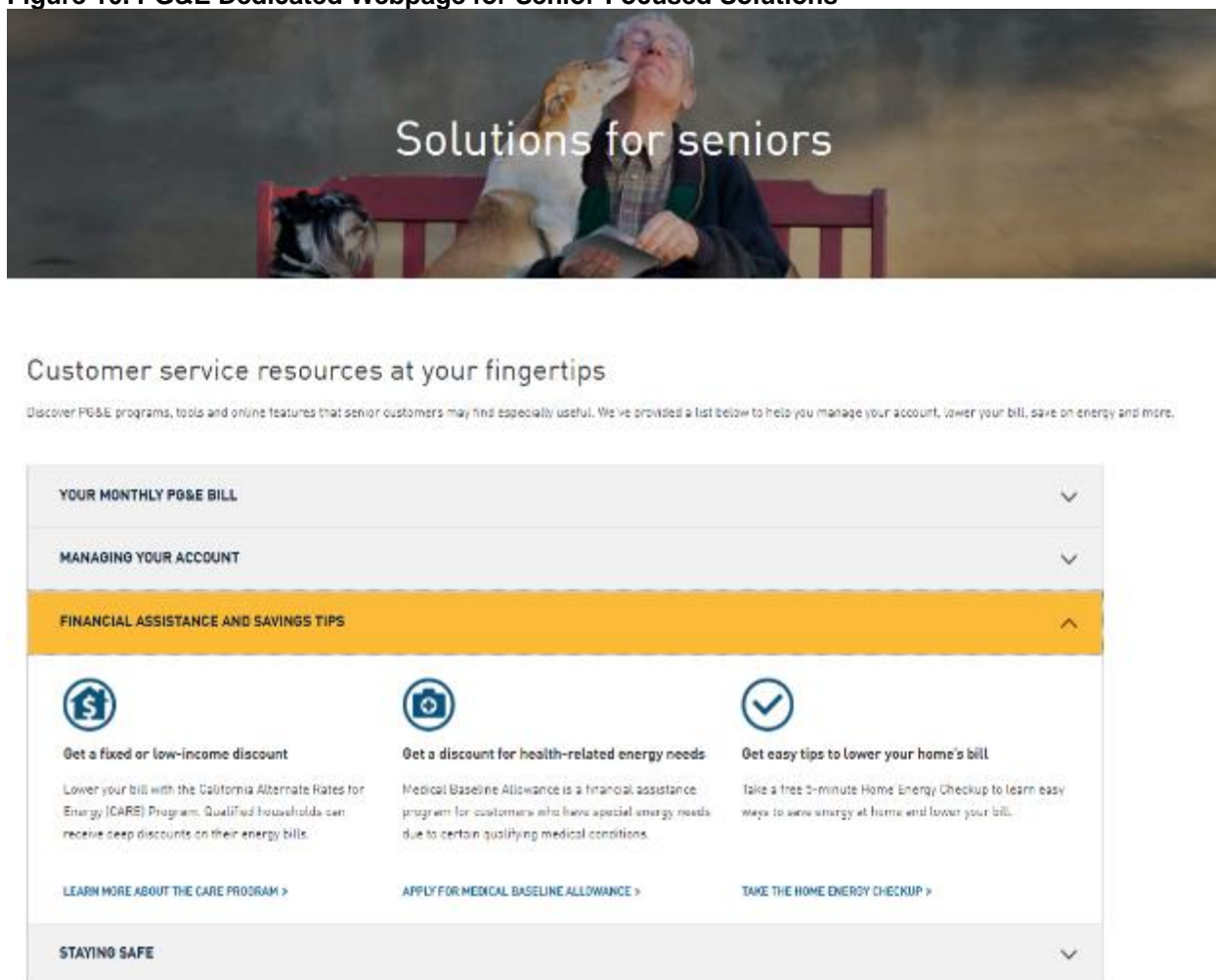
Budget Billing enables customers to average out energy costs for more manageable monthly payments. Using the customer's energy use history, PG&E will level out the monthly payment amount, so if energy usage changes significantly from season to season, customers will not see big spikes on their bills. Budget Billing averages annual energy costs over the last 12 months to determine a monthly payment amount. Every four months, we will review the customer's Budget Billing amount and adjust the Budget Billing amount (up or down) if the actual energy usage changes significantly.

Online Tools and Support

PG&E will continue to encourage our customers to access support through their PG&E online account to monitor energy use and check or compare rate plans. These self-service tools provide an easy way for customers to access relevant information based on their particular needs. For example, to help customers find the information they may be looking for, we have created specialized webpages that consolidate useful information for families, senior, roommates, and energy savvy customers. Figure 10 shows an example of our dedicated

webpage for our senior customers.⁵⁹ We will promote these types of tools in our coordinated communication campaigns, as described in Section 3.

Figure 10. PG&E Dedicated Webpage for Senior-Focused Solutions



Other online tools like our Rate Plan Comparison tool are helpful for customers to compare all rate plan options based on their home's past 12 months of usage. In addition, customers can access the following online tools to help them manage their bills, including:

- **Bill Forecast Alerts** to easily stay on top of monthly energy bills and avoid bill surprises;
- **An Energy Usage Tool** to help customers understand when and how there are using energy; and
- **The Home Energy Checkup** provides customers with personalized energy-saving recommendations based on answers about their home and lifestyle.

⁵⁹ pge.com/seniors



b. Financial Assistance Programs

PG&E offers a variety of bill discounts and savings opportunities for our customers. As the financial protections expire, PG&E will continue to promote these opportunities to our customers and encourage enrollments.

Bill Discounts

CARE, FERA, and Medical Baseline are PG&E discount programs that help eligible customers pay their energy bills:

- **CARE:** A monthly discount of 20% or more on gas and electricity. Participants qualify through income guidelines or if enrolled in certain public assistance programs.
- **FERA:** A monthly discount of 18% on electricity only. Must be a household with three or more people. Participants qualify through income guidelines.
- **Medical Baseline (Medical Baseline Allowance):** An assistance program for residential customers who depend on power for certain medical and independent living needs. The program offers eligible customers lower rate on their monthly energy bill and additional PSPS notifications.

Low-Income Home Energy Assistance Program

LIHEAP is a federally funded⁶⁰ income-qualified⁶¹ program overseen by the California Department of Community Services and Development (CSD) and administered by 31 Action Agencies throughout California that provides up to \$1,000 to pay eligible household energy costs, including electric and gas bills. As a result, LIHEAP funds may be an additional source of funds that can be used to pay for some arrearages.⁶²

In March 2020, Congress enacted the Coronavirus Aid, Relief, and Economic Security (CARES) Act to provide emergency assistance in response to the pandemic. As part of this effort, the federal government allocated an additional \$49 million⁶³ to California to supplement its annual LIHEAP grant, which totaled \$203 million for Federal Fiscal Year 2019-2020.

In addition, Governor Newsom signed Executive Order N-75-20 on August 24, 2020 to provide additional flexibility to CSD to ensure that CARES Act funds for LIHEAP are maximized to benefit Californians in need. While LIHEAP services are available to all eligible Californians,

LIHEAP Awareness Campaign

After soliciting input on messaging from CSD, PG&E launched a LIHEAP awareness campaign using online advertising and direct marketing in Q4 2020. As part of this campaign, PG&E sent zip-code targeted direct mail postcards to customers in San Joaquin County.

Based on positive response by the agency and increased application volume after deployment, PG&E is expanding this effort and offering agencies across our service area the option to participate in a co-marketing campaign which target potentially eligible income-qualified customers and refer interested customers directly to participating agencies.

⁶⁰ LIHEAP is funded by the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services.

⁶¹ See 2021 LIHEAP Income Eligibility <https://www.csd.ca.gov/Pages/LIHEAP-Income-Eligibility.aspx>

⁶² See D.20-06-003, p. 28.

⁶³ See FY 2020 Release to States and Territories of LIHEAP Supplemental Funds under the CARES Act https://www.acf.hhs.gov/sites/default/files/documents/ocs/comm_liheap_supplreleasedclstatesterr fy2020.pdf.



CARES Act funding is prioritized for Californians that have suffered an employment impact from the COVID-19 recession. California has prioritized this funding to support the immediate financial needs of low-income individuals and families through utility assistance payments.⁶⁴

In 2020, PG&E observed a 33% decrease in the monthly average of LIHEAP customer pledges compared to 2019. Action Agencies such as Redwood Community Action Agency and Local Service Providers (LSPs) such as the Dolores Huerta Foundation have observed a decrease in customers reaching out to request assistance with paying their utility bills.⁶⁵ Action Agencies have indicated changes in their customer interactions due to COVID-19, such as halting weekly education and intake workshops, reducing the number of clients allowed to enter the office, and eliminating in-person outreach efforts. Both Action Agencies and LSPs believe the decrease was, in part, a result of customers not receiving disconnection notices during the disconnections moratorium.⁶⁶

PG&E plans to continue collaborating with CSD, Action Agencies, and LSPs to notify customers about the expiration of customer protections and the benefits of LIHEAP as an option for customers to manage their utility bills.

In addition, PG&E continues to explore opportunities to partner with local, state, and federal government agencies that have been allocated additional CARES Act Funding. See Section 4.5.1 for more information on how PG&E is working with government agencies.

PG&E observed a 33% decrease in the monthly average of LIHEAP pledges in 2020.

Action Agencies and LSPs have indicated that the decrease is due in part to the fact that customers are not receiving disconnection notices and have stopped thinking about their utility bills.

Relief for Energy Assistance through Community Help

REACH provides income-qualified customers with financial assistance during times of hardship. As discussed in Section 3.2.2, customers can receive an energy credit for up to \$300 based on the past due bill, subject to funding availability. The program is funded through tax-deductible contributions from PG&E customers and employees.

⁶⁴ See California Low Income Home Energy Assistance Program State Plan <https://www.csd.ca.gov/Shared%20Documents/2021-LIHEAP-State-Plan.pdf>.

⁶⁵ Statements made by Redwood Community Action Agency and Dolores Huerta Foundation at the November 12, 2020 [CPUC Workshop on COVID Impacts on Customers in the Energy Sector](#)

⁶⁶ Statements made by CSD, Action Agencies, and LSPs at the November 12, 2020 [CPUC Workshop on COVID Impacts on Customers in the Energy Sector](#)

c. Energy Savings and Demand-Side Management Programs

Energy Savings Assistance Program

The ESA program provides free home weatherization, energy-efficient appliances, and energy education services to income-qualified⁶⁷ PG&E customers.⁶⁸ The ESA program emphasizes long-term and enduring energy savings, serving all willing and eligible low-income customer populations by providing program measures such as refrigerators, water heaters, furnaces, light-emitting diodes (LEDs), appliances, attic insulation, and other weatherization measures at no cost to the customer. Participation in the ESA program can help customers lower energy bills, while increasing their health, comfort, and safety. The ESA program is available to both homeowners and renters of all housing types.

PG&E automatically enrolls customers in CARE who participate in ESA. When combined with ESA energy savings, CARE and ESA low-income participants can further reduce their utility bills and help make on-time payment more achievable.⁶⁹

Low-income households exhibit diverse housing characteristics and demographics, suggesting that tailored and personalized outreach stands to be more effective than a uniform, one-size-fits-all approach.⁷⁰ PG&E is confident that our ESA contractors⁷¹ are positioned to help connect low-income households to both CARE and ESA programs through personalized outreach. To improve the reach of these programs, PG&E will work with ESA contractors to target low-income households for enrollment in the CARE and ESA programs.

Other Energy Savings and Demand-Side Management Opportunities⁷²

In addition to ESA, PG&E offers a number of other programs that can help customers lower their bills. While these programs have various eligibility requirements and may not work for all customers, our CSRs are trained to help customers navigate the available options and help guide them to the programs that might work best for them.

- **PG&E's Energy Efficiency Portfolio:** As customers begin to recover from the financial hardships, they have experienced during the COVID-19 pandemic, PG&E energy efficiency programs may offer good opportunities to help implement long-term savings

⁶⁷ See income eligibility requirements for ESA

https://www.pge.com/en_US/residential/save-energy-money/help-paying-your-bill/energy-reduction-and-weatherization/energy-savings-assistance-program/energy-savings-assistance-program.page

⁶⁸ Authorized in D.16-12-022 as modified by D.17-12-009. To qualify for the ESA program, a residential customer's household income must be at or below 200% of FPG, as required in D.05-10-044. The 2017-2020 ESA program continues to follow the policy and guidance outlined in D.07-12-051, which required the IOUs to offer all eligible customers the opportunity to participate in the program, and to offer participants all cost-effective energy efficiency measures by 2020.

⁶⁹ Free Energy Savings Co LLC response letter on the Commission's Draft Resolution M-4849 p. 3.

⁷⁰ O'Dwyer, Cindy, DEFG. 2013a. "Engaging and Enrolling Low Income Consumers in Demand Side Management Programs." <http://defgllc.com/publication/engaging-and-enrolling-low-income-consumers-in-demandside-management-programs/>

⁷¹ The ESA program is administered through PG&E's third-party implementers, Nexant and Richard Health & Associates who oversee networks of ESA contractors. The ESA program trains Energy Specialists, Weatherization Specialists, Natural Gas Appliance Testing Technicians, and appliance subcontractors to help install program measures.

⁷² As of February 2021, there are several programs that are fully subscribed but could help customers if and/or when program enrollments reopen. These include the Low Income Weatherization Program (LIWP), Community Solar Green Tariff, DAC Green Tariff, Single Family Affordable Solar Homes (SASH), and Multi-family Affordable Solar Homes (MASH)

on their energy bills. Appendix C includes details on energy efficiency program options for our residential customers.

- **San Joaquin Valley Disadvantaged Communities Pilot Program:** A pilot program providing fuel switching from wood/ propane appliances to electric appliances at no cost for residents in 8 communities in the San Joaquin Valley. Other PG&E programs are also leveraged to maximize energy and bill savings, including CARE, FERA, ESA, DAC-GT, DAC-SASH, SGIP, and WatterSaver.
- **Disadvantaged Communities (DAC) Single Family Affordable Homes (DAC-SASH):** Low-income homeowners in economically and environmentally disadvantaged communities can further increase financial savings by going solar. PG&E's DAC-SASH program provides qualifying low-income homeowners no-cost rooftop solar installations.
- **Solar on Multi-family Affordable Housing (SOMAH):** SOMAH provides financial incentives for installing photovoltaic energy systems on multifamily affordable housing.
- **WatterSaver:** A five-year distributed thermal energy storage program using customer owned electric water heaters to shift energy use outside of the peak period reduce and help low-income and residential and small business) DAC customers save on their electricity bills, as well as provide an upfront enrollment incentive and continuing monthly participation payments.
- **Residential Reward:** A three-year demand response pilot program that will dispatch bring-your-own technologies and behavioral customers on Flex Alert and grid emergency days, and provides enrollment and end-of-season rewards for customers.

d. Helping our Residential Customers Find the Best Rate Plans

PG&E believes that it is important for our customers to understand their rate options and choose the plan that works best for them, especially since the expiration of customer protections coincides with the transition to TOU rates for approximately 2.5 million eligible customers. Specifically, from April 2021 through March 2022, PG&E plans to automatically transition approximately 2.5 million eligible customers from a Tiered Rate Plan (E-1) to the Time-of-Use (Peak Pricing 4-9 p.m. Every Day) (E-TOU-C) rate plan on a county by county basis as shown in Figure 11.

TOU rates are a valuable tool to help meet our state's goal to create a cleaner energy future. This rate plan's prices vary based on the time of day electricity is used every day as well as the season. It includes a baseline credit that offers residential customers a price discount for usage below their baseline allowance and offers bill protection for the first year.⁷³ In addition, several customer classes are excluded from the transition, including customers in hot climate zones who are enrolled in or eligible for enrollment in CARE/FERA.⁷⁴

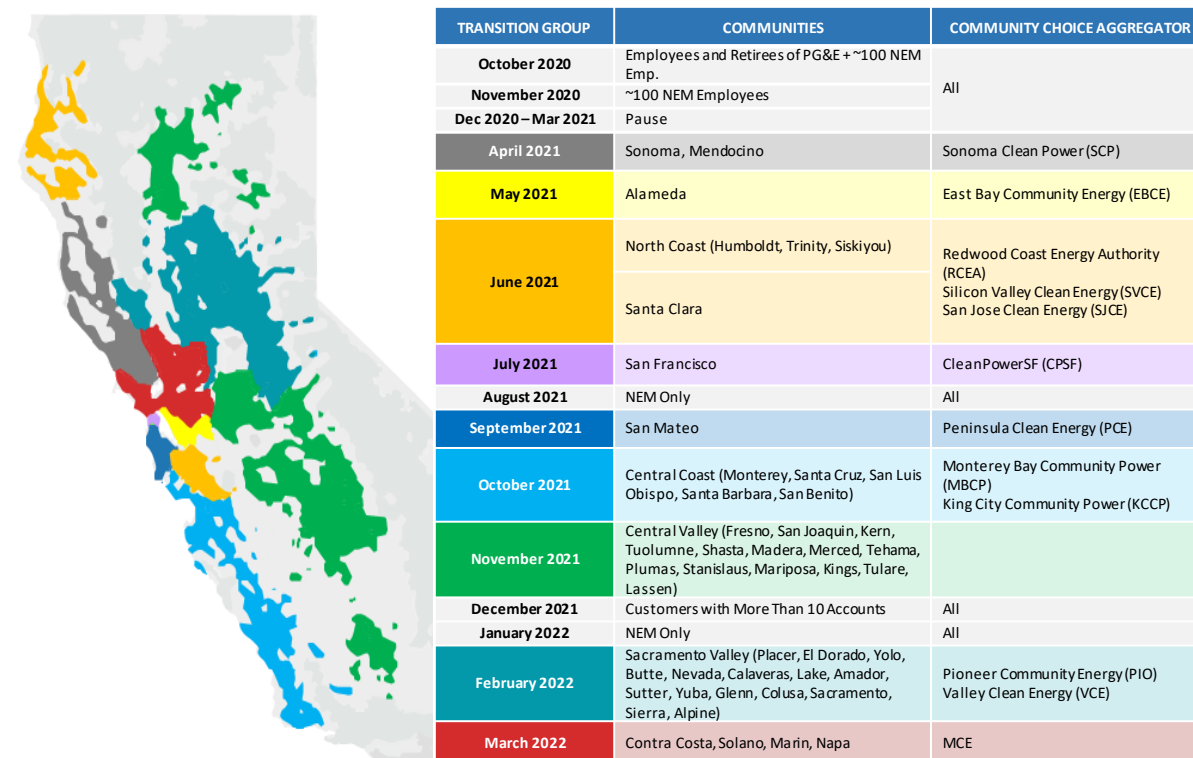
However, PG&E recognizes that a TOU rate plan might not fit the needs of all of customers and they may opt-out of it if they choose. Nevertheless, the TOU transition serves as an opportunity

⁷³ If a customer pays more during their first year on the E-TOU-C rate plan than if the customer had remained on the Tiered Rate Plan (E-1), PG&E will credit the customer the difference at the end of 12 months. If the customer decides they are not satisfied on this rate plan, the customer can switch to another rate plan at any time. Bill protection will still apply for the time that the customer was on the E-TOU-C rate plan.

⁷⁴ Other customers excluded from the E-TOU-C rate plan transition include 1) Customers already on a TOU rate plan (including an Electric Vehicle rate plan); 2) Customers enrolled in Medical Baseline; 3) Customers who started or transferred service as of October 1, 2020 or later; and 4) Customers with less than 12 months of service at their current address

to highlight that customers have rate options and that they should choose the rate plan that works best for their household.

Figure 11. Time of Use Transition Timeline



Our objective is to transition customers off customer protections and onto TOU as smoothly as possible with clear, coordinated communications and targeted customer outreach wherever possible. In some instances, the TOU communications will overlap with our COVID-19 consumer protections ME&O. As a result, PG&E will coordinate the messaging in its ME&O for these initiatives to avoid customer confusion and communication “fatigue.”

Specifically, we will send a letter to eligible customers 90 days before they are transitioned to a TOU rate and will include a personalized rate comparison so that they can make an informed decision of whether to participate. Customers can then choose to stay on their current rate plan (i.e. opt-out of the transition), pick another rate plan that is best for their household, or transition to TOU. They can make their selection online through “Your Account”, by returning the tear-off section of their 90-day notification, or by calling PG&E. Customers who elect to transition to TOU will receive a welcome letter or email 30 days before they transition to TOU which includes additional tips on how to be successful on TOU.⁷⁵ See Figure 12 for a snapshot of the customer journey.

Additionally, PG&E has currently enlisted the help of more than 20 CBOs to help educate vulnerable customers (e.g., low-income, multicultural, disabled, seniors, geographically isolated) on how to manage their bills and understand their rate options. This includes raising awareness that eligible residential electric customers will transition to TOU rates from April 2021 through March 2022 based on their geographic location.

⁷⁵ We offer an array of tools (i.e., bill forecast alerts) that customers can use to get the most value out of their new TOU plans and save energy and money.

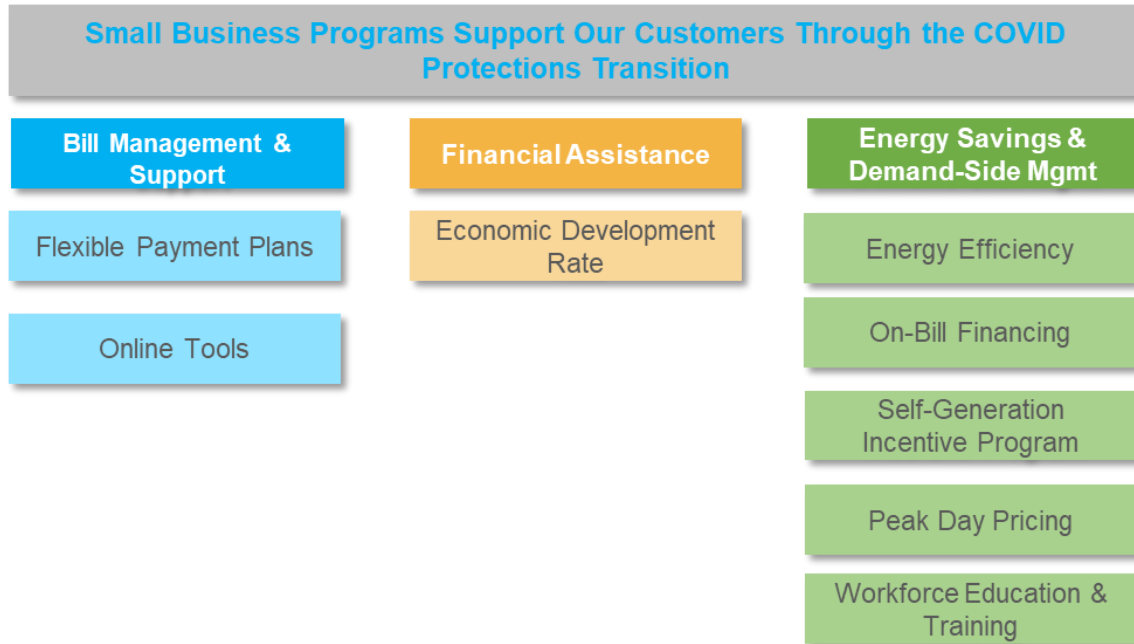
Figure 12. TOU Customer Notification & Transition Timeline



2. Small Business Customers

California's COVID-19 daily diagnosis statistics remain high⁷⁶ and many businesses are not operating at full capacity. In support of these customers, PG&E's small business engagement team reaches out to small businesses and local chambers to inform customers of online tools, energy efficiency programs, payment arrangements, and rate options to help save time and money. PG&E identifies specific programs available to assist small business customers in Figure 13 and describes these offerings in further detail below.

Figure 13. PG&E's Small Business Customer Programs



a. Bill Management and Service Support

Flexible Payment Plans

Although PG&E will no longer be required to provide flexible payment plans to customers once the protections expire, PG&E will continue to offer 12-month payment plans to our small business customers throughout 2021. PG&E will inform customers of this continued assistance through the ME&O activities described for small businesses in Section 4.

b. Financial Assistance

Economic Development Rate (EDR)

PG&E offers 12%, 18 or 25% discount for qualified businesses that would relocate or expand out of state, or existing businesses that would move out of CA or close their business without the EDR. Small businesses below 150 kW can qualify. PG&E's small business team is actively reaching out to eligible customers to educate and enroll them in the EDR rate.

⁷⁶ See Johns Hopkins University & Medicine tracking of daily confirmed new cases at <https://coronavirus.jhu.edu/region/us/california>.



Energy Savings and Demand-Side Management Programs

In addition to the EDR, PG&E offers a number of other programs that can help small businesses lower their bills. While these programs have various eligibility requirements and may not work for all small businesses, our CSRs are trained to help customers navigate the available options and help guide them to the programs that might work best for them.

- **Energy Efficiency:** We offer a variety of energy efficiency programs to help small business customers lower their bills by reducing their energy usage. Many of these programs require little to no investment from the customer, which can further assist customers struggling to pay their bills. A list of these energy efficiency programs is included in Appendix C – Energy Efficiency Programs.
- **On-Bill Financing (OBF):** OBF allows eligible PG&E commercial customers to obtain zero interest loans of \$5,000-\$100,000 with payback periods of up to 60 months for a wide variety of energy efficiency projects. Improving energy efficiency is a goal for many small business customers to help reduce energy bills but can be viewed as cost prohibitive, particularly during the pandemic.

To address this barrier to energy efficiency, PG&E began allowing customers to request to defer loan repayments for six months.⁷⁷ PG&E was authorized by the Commission to defer customer payments on OBF loans through November 11, 2020 and intends to submit an advice letter to further extend this support.

- **Self-Generation Incentive Program (SGIP):**⁷⁸ SGIP offers rebates for installing energy storage technology at non-residential facilities, including battery storage systems that can help small businesses to operate during a power outage.
- **Peak Day Pricing (PDP):** PDP offers businesses a discount on regular summer electricity rates in exchange for higher prices during nine to 15 Peak Pricing Event Days per year, typically occurring on the hottest days of the summer. Peak Day Pricing comes with automatic bill protection for the first 12 months. This ensures customers will not pay more during the first year than they would have on a previous plan.
- **Workforce Education and Training at PG&E's Energy Centers:** Small business customers can gain new skills through free online courses and a robust learning library. For example, our Food Service Technology Center (FSTC) offers restaurant owners in-person (subject to current public health issues) and online education and training options. Educational seminars at the FSTC cover such topics as energy-saving best practices, specifying efficient equipment, and electrifying restaurants.

⁷⁷ See Advice 4326-G/5805-E.

⁷⁸ To better align incentive payments with what customers were expecting pre-COVID, PG&E is seeking authorization to provide better flexibility around the calculations of performance-based incentives. If approved, this would improve the return on some customers' storage investments, affording them more money in their pockets to pay for essential needs.

c. Online Business Resource Tools

PG&E offers a number of online tools for our small business customers to help them manage their business's energy use and save money. Available assistance includes tools that make it easy for customers to pay their bills, understand their energy usage and rates, and access tips to reduce energy in their facilities. In addition, we offer small businesses the monthly *PG&E Energy Advisor for Business* newsletter, an easy-to-read update to help customers stay informed of the latest news and solutions for managing their business's energy use and costs. In our most recent newsletter, as shown in Figure 14, we provided helpful information about financial assistance opportunities and ways to save.

d. Helping our Small Business Customers Find the Best Rate Plans

Beginning in March 2021, eligible businesses will be moving to new TOU rate plans with later peak hours. The new on-peak hours (when rates will be higher) will be 4-9 p.m. every day of the year. In addition, these new rate plans will only have partial-peak periods during summer months (2-4 p.m. and 9-11 p.m. every day, June through September), and a super off-peak period, when prices will be lower, during spring months (9 a.m. – 2 p.m. every day, March through May). It will be important for our small business customers to understand these changes, and how they might impact their electric bills. Many of our small business customers have faced significant financial hardships throughout the COVID-19 pandemic.

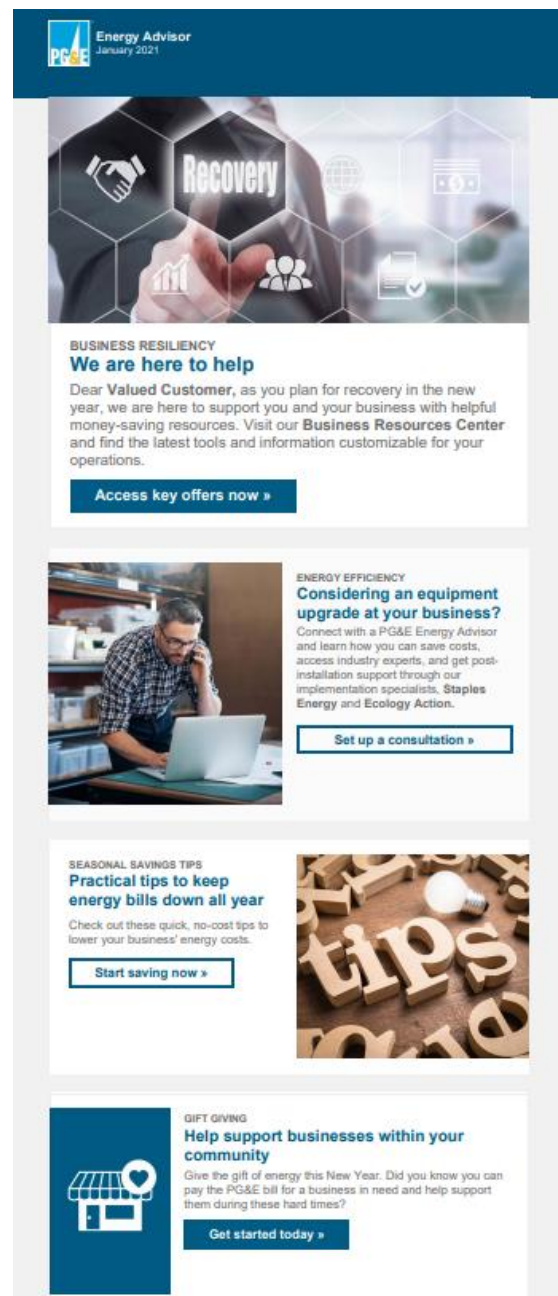
As COVID-19 protections end for our small business customers, it is important that we help them find the rate options that work best for them. Most business customers have several rate options from which to choose. With our online rate analysis tool, customers can see the different rate plans that apply to their account. We also offer our customers a helpful tool that allows them to easily track their energy use, get energy savings recommendations, and create energy savings plans. We want to ensure our small business customers are on the best rate, and have the right tools, to help them manage and control their energy use.

Ultimately, we will coordinate the TOU rate plan changes with our COVID-19 protection communications to mitigate customer confusion, conflicting messaging, and communication “fatigue.” Our ME&O plans are described in more detail in Section 4.

3. Expanding Solutions for COVID-Impacted Customers

PG&E is exploring further solutions that could benefit customers financially impacted by the COVID-19 pandemic. In addition to the Percentage of Income Payment Plan (PIPP) Pilot that is

Figure 14. Excerpt from January 2021 Version of *PG&E Energy Advisor for Business Newsletter*





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currently being considered in R.18-07-005, PG&E is considering additional measures that will be discussed in more detail in the Order Instituting Rulemaking (OIR) to Address Energy Utility Customer Bill Debt Accumulated During the COVID-19 Pandemic (Rulemaking (R.) 21-02-014).



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Appendix B – Customer Arrearage Data

[TBD—to be completed prior to filing]



Appendix C – Energy Efficiency Programs

PG&E offers a variety of energy efficiency programs to help customers lower their bills by reducing their energy usage. Many of these programs require little to no investment from the customer, which can further assist customers struggling to pay their bills. The residential and non-residential energy efficiency programs are summarized below in Table 7 and Table 8, respectively.

Table 7. Residential Energy Efficiency Programs

Program	Cost to Customer	Best for Customers Who Want to...	Products and Services	Geography and Eligibility
HomeIntel, by Home Energy Analytics	Free	Better understand their electric and gas use and identify the categories with the most savings potential. Reduce "idle load" energy waste from electronics, refrigerators, and other plug loads.	In-depth analysis of your home's energy use, customized recommendations, and energy coaches to help you. Includes monthly energy efficiency progress report.	Services will be focused on all PG&E territory. PG&E customers that live in single family homes and multi-family units.
Home Energy Rewards, by Franklin Energy	Free to start; Discounts on purchase of energy efficient products. Earn points and redeem them for rewards.	Reduce energy use in your home. Start an energy efficiency journey to achieve savings and earn benefits.	In-depth analysis of your home's energy use, customized recommendations, and free energy savings kit (LEDs, water saving devices). Discounted energy efficient products.	PG&E Electric customers that live in single family homes. Must have lived in the home at least one-year and not have participated in a PG&E rebate program in that time. No solar, no electric vehicles.
Home Energy Optimization Program, by ICF	Free	Help make saving energy automatic with no cost smart home technology, professionally installed for free.	Includes smart thermostat, additional smart home tech, other energy-efficient products. All items are professionally installed free of charge.	Qualified single-family homeowners in Fresno.



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Table 8. Non-Residential Energy Efficiency Programs

Program	Partner	Description	Eligible Technologies	Geography and Eligibility
The Hospitality Program	Ecology Action	The Hospitality Program provides energy efficiency recommendations, project oversight, and rebates to hospitality customers in the PG&E service area. Free energy audits are available to hotels, food service, casinos, health clubs and others.	Lighting, HVAC, Motors, Controls, Pool Heaters, Custom Retrofit, Retrocommissioning	<ul style="list-style-type: none"> • All PG&E • Hotels, food service, casinos, health clubs and others
Regional Direct Install Programs	Marin County	PG&E's Regional Direct Install Programs provide a full-service approach to serving small & medium business customers by offering no-cost energy audits, technical assistance & installation support, and financial incentives for lighting and refrigeration projects. Each area in PG&E's service territory is served by a unique "regional" program and operates in partnership with a local government partner under the "Energy Watch" brand.	Lighting, Refrigeration	<ul style="list-style-type: none"> • Marin County and City of Richmond • Small and Medium Businesses, Municipalities, and Non-Profits
Regional Direct Install Programs	Staples Energy	PG&E's Regional Direct Install Programs provide a full-service approach to serving small & medium business customers by offering no-cost energy audits, technical assistance & installation support, and financial incentives for lighting and refrigeration projects. Each area in PG&E's service territory is served by a unique "regional" program and operates in partnership with a local government partner under the "Energy Watch" brand.	Lighting, HVAC, Refrigeration	<ul style="list-style-type: none"> • All PG&E small and medium businesses, municipalities, and non-profits