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Regulatory Affairs
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February 4, 2022

**ADVICE LETTER 3941-E/3058-G
(San Diego Gas & Electric Company (U 902-M))**

**ADVICE LETTER 007-E
(San Diego Community Power)**

**ADVICE LETTER 004-E
(Clean Energy Alliance)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: JOINT IMPLEMENTATION PLAN FOR PERCENTAGE OF INCOME PAYMENT PLAN (PIPP) PILOT PROGRAM AND ESTABLISHMENT OF PIPP REGULATORY ACCOUNTS PURSUANT TO DECISION 21-10-012

San Diego Gas & Electric Company (SDG&E), together with participating Community Choice Aggregators (CCAs) San Diego Community Power (SDCP) and Clean Energy Alliance (CEA) (the CCAs jointly referred to as "CCA energy partners"), hereby submit this Advice Letter (AL) regarding details of implementing its PIPP Pilot program for approval to the California Public Utilities Commission (Commission).

PURPOSE

SDG&E and the CCA energy partners jointly submit this Tier 3 AL for approval of the PIPP Pilot program implementation plan attached hereto in accordance with Ordering Paragraphs (OP) 2 and 3 of Decision (D.) 21-10-012.

BACKGROUND

On September 28, 2017, Governor Brown signed Senate Bill (SB) 598 into law acknowledging the rising disconnections of gas and electric utility customers, especially among vulnerable populations. On July 12, 2018, the Commission opened Rulemaking (R.) 18-07-005 to address SB 598 requirements and residential disconnections across California's electric and gas investor-owned utilities (IOUs).

On June 16, 2020, the CPUC adopted Decision (D.) 20-06-003 (Phase I Decision), which established various rules and policy changes to reduce the number of residential customer disconnections and to improve reconnection processes for disconnected customers. In addition, the Phase I Decision adopted the Arrearage Management Plan (AMP) program, which provides bill debt forgiveness for residential customers that make on-time bill payments and established a ratesetting phase (PIPP Phase) for this proceeding to consider a PIPP program.

On October 30, 2020, the assigned Commissioner issued a scoping memo on the PIPP Phase requesting briefs, which were filed by parties in December 2020. The assigned Administrative Law Judge (ALJ) issued a series of rulings requesting party comments on various PIPP issues and details throughout the first half of 2021.

On October 11, 2021, the Commission issued D.21-10-012 (PIPP Decision), which adopted the PIPP Pilot program to test whether a percentage of income payment plan would reduce residential disconnections of electric and gas services. Generally, PIPP programs sets participating customer bills at a percentage of monthly income regardless of energy usage. Here, the Commission has established the PIPP Pilot to test and evaluate whether the PIPP Pilot program can help achieve any of the following program goals: (i) reduce the number of low-income households at risk of disconnection, (ii) encourage participation in energy saving and energy management programs, (iii) increase access to essential levels of energy service, and (iv) control program costs.¹

Pursuant to the PIPP Decision, eligible CCA customers may also participate in the PIPP Pilot to the extent their CCAs elect to participate the utility's program.² The PIPP Decision directs IOUs to work closely with participating CCAs to develop the PIPP Pilot implementation plan and marketing strategy within the guidance lines outlined in Attachment A of the PIPP Decision.

CEA and SDCP notified SDG&E via service list in this proceeding that they would like to participate in SDG&E's PIPP Pilot program on October 25, 2021 and November 11, 2021 respectively.

The PIPP Decision directs the IOUs to commence marketing, education, and outreach for the PIPP Pilot within 45 days of the approval of this AL, and for SDG&E no sooner than July 1, 2022,³ and serve evaluation metrics every six months after launch of the PIPP Pilot program. Southern California Edison (SCE) is directed to hire a third-party facilitator to coordinate the working group, which must convene within 60 days of the effective date of the PIPP Decision.⁴ The PIPP Decision further directs Pacific Gas & Electric Company (PG&E) to conduct a request for proposal and enter into a contract with an evaluation contractor with experience evaluating low-income energy programs, based on direction from the Energy Division, within six months of the PIPP Decision.⁵ The Energy Division will select the evaluation contractor and approve key deliverables, including the scope of work, the evaluation plan, the reporting metrics, and the evaluation report.⁶

¹ D.21-10-012, Attachment A page 1.

² D.21-10-012, OP 3, page 90.

³ *Id.* at Attachment A, p.4.

⁴ D.21-10-012, OP 12.

⁵ D.21-10-012, Attachment A at Section 15; OP 13.

⁶ D.21-10-012, Attachment A at Section 15.

Lastly, the Decision authorized the utilities, including SDG&E, to establish new memorandum accounts to track incremental administrative costs associated with the PIPP pilot as well as a two-way PIPP balancing account for pilot bill subsidies.⁷

DISCUSSION

SDG&E, jointly with SDCP and CEA, its CCA energy partners, submit the PIPP Pilot program plan herein as Attachment C, which includes proposed implementation details and plan specifics that align with PIPP Pilot guidance as directed by the Commission in the PIPP Decision.

The plan, as outlined in Attachment C, includes agreed-upon pilot size and participation targets/caps for SDG&E, SDCP, and CEA customers and other details regarding the enrollment process, targeted customers and eligible zip codes in the service territory, income verification, billing specifics, and a marketing, education, and outreach plan.

SDG&E also submits for approval revisions regarding PIPP Pilot details to SDG&E's tariff language (see Attachments A and B for proposed E-PIPP and G-PIPP tariffs, respectively).

Finally, SDG&E proposes the establishment of the PIPP Memorandum Accounts (electric and gas) and the PIPP Balancing Accounts (electric and gas) in this AL as directed by the PIPP Decision. Proposed preliminary statements for the new regulatory accounts are located in Attachment A (Electric) and Attachment B (Gas). The proposed CCA cost recovery and remittance process proposed here is consistent with the AMP resolution as directed by the PIPP Decision.⁸

With this AL submission, SDG&E, SDCP, and CEA seeks Commission approval of the PIPP Pilot Program Plan outlined in Attachment C, and SDG&E seeks approval of related proposed SDG&E Electric and Gas tariff changes located in Attachments A and B, respectively.

EFFECTIVE DATE

SDG&E believes this submittal is subject to Commission approval and should be classified as a Tier 3 Advice Letter submittal pursuant to OP 2 of D.21-06-012 and GO 96-B. SDG&E respectfully requests that this submittal be effective upon Commission approval.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be submitted electronically and must be received no later than February 24, 2022, which is 20 days of the date this Advice Letter was submitted with the Commission. There is no restriction on who may submit a protest.

The protest should be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the addresses shown below on the same date it is delivered to the Commission.

⁷ D.21-10-012, OP 10-11, page 91.

⁸ D.21-10-012, Attachment A, 5.b. page 3.

For SDG&E:

Attn: Greg Anderson
Regulatory Tariff Manager
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, CA 92123
GAnderson@sdge.com
SDGETariffs@sdge.com

For SDCP:

Laura Fernandez
Director of Regulatory and Legislative Affairs
San Diego Community Power
815 E Street, Suite 12716
San Diego, CA 92112
LFernandez@sdcommunitypower.org

For CEA:

Barbara Boswell
Chief Executive Officer
Clean Energy Alliance
1200 Carlsbad Village Dr.
Carlsbad, CA 92008
ceo@thecleanenergyalliance.org

NOTICE

A copy of this submittal has been served on the utilities and interested parties shown on the attached list, including interested parties in R.18-07-005 by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by email to SDGETariffs@SDGE.com.

/s/ Clay Faber

CLAY FABER
Director – Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission
CA. Public Advocates (CalPA)

R. Pocta
F. Oh

Energy Division

M. Ghadessi
M. Salinas
L. Tan
R. Ciupagea
K. Navis
Tariff Unit

CA Energy Commission

B. Penning
B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

M. Cade
K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Biofuels Energy, LLC

K. Frisbie

Braun & Blaising, P.C.

S. Blaising
D. Griffiths

Buchalter

K. Cameron
M. Alcantar

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Cameron-Daniel, P.C.

General

City of Poway

Poway City Hall

City of San Diego

L. Azar
J. Cha
D. Heard
F. Ortlieb
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P. DeVille

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T. Schmid
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J. Martin
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Davis Wright Tremaine LLP

J. Pau

Douglass & Liddell

D. Douglass
D. Liddell

Ellison Schneider Harris & Donlan LLP

E. Janssen
C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg
J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard
R. Keen

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson
M. Huffman
Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

SD Community Power

L. Fernandez
L. Utouh

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing
Communities Association

S. Dey

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clower@earthlink.net
hpayne3@gmail.com
puainc@yahoo.com
AKanzler@anaheim.net

Service List

R.18-07-005

ATTACHMENT A
ADVICE LETTER 3941-E

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Revised 35968-E	PRELIMINARY STATEMENT, II. BALANCING ACCOUNTS, DESCRIPTION/LISTING OF ACCOUNTS, Sheet 3	Revised 35913-E
Original 35969-E	PRELIMINARY STATEMENTS, II. BALANCING ACCOUNTS, PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT (PIPPBA), Sheet 1	
Original 35970-E	PRELIMINARY STATEMENTS, II. BALANCING ACCOUNTS, PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT (PIPPBA), Sheet 2	
Revised 35971-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, DESCRIPTION/LISTING OF ACCOUNTS, Sheet 3	Revised 35697-E
Original 35972-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT (PIPPMA), Sheet 1	
Original 35973-E	PRELIMINARY STATEMENT, III. MEMORANDUM ACCOUNTS, PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT (PIPPMA), Sheet 2	
Original 35974-E	SCHEDULE E-PIPP, PERCENTAGE OF INCOME PAYMENT PLAN, Sheet 1	
Original 35975-E	SCHEDULE E-PIPP, PERCENTAGE OF INCOME PAYMENT PLAN, Sheet 2	
Original 35976-E	SCHEDULE E-PIPP, PERCENTAGE OF INCOME PAYMENT PLAN, Sheet 3	
Revised 35977-E	TABLE OF CONTENTS, Sheet 1	Revised 35953-E
Revised 35978-E	TABLE OF CONTENTS, Sheet 2	Revised 35916-E
Revised 35979-E	TABLE OF CONTENTS, Sheet 7	Revised 35636-E



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 35968-E

Canceling Revised Cal. P.U.C. Sheet No. 35913-E

PRELIMINARY STATEMENT

Sheet 3

II. BALANCING ACCOUNTS
DESCRIPTION/LISTING OF ACCOUNTS

Listing of Accounts (Continued)

- Medium-Duty and Heavy-Duty Electric Vehicle Balancing Account (MDHDBA)
- Vehicle to Grid Balancing Account (V2GBA)
- Power Charge Indifference Adjustment Under-Collection Balancing Account (CAPBA)
- Overhead Pools Balancing Account (OPBA)
- San Diego Unified Port District Balancing Account (SDUPDBA)
- Light-Duty Electric Vehicle Balancing Account (LDBA)
- BioMAT Non-Bypassable Charge Balancing Account (BNBCBA)
- Microgrid Balancing Account (MGBA)
- Flex Alert Balancing Account (FABA)
- Rule 20 Balancing Account (R20BA)
- Distribution Deferral Contract Cost Balancing Account (DDCBA)
- Distribution Deferral Incentive Balancing Account (DDIBA)
- DWR Excess Bond and Power Charge Refund (AB1XBA)
- Percent of Income Payment Plan Balancing Account (PIPPBA)

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3P4

Advice Ltr. No. 3941-E

Decision No. 21-10-012

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Feb 4, 2022

Effective _____

Resolution No. _____



PRELIMINARY STATEMENTS

II. BALANCING ACCOUNTS

PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT (PIPPBA)

1. Purpose

The Percentage of Income Payment Plan Balancing Account (PIPPBA) is a two-way, interest bearing balancing account recorded on SDG&E's financial statements pursuant to Decision (D.) 21-10-012, OP 9 and OP 10. The purpose of the PIPP Balancing Account is to record customer bill discounts associated with the PIPP pilot program. If an eligible Community Choice Aggregator (CCA) opts to participate in the PIPP pilot program, then the CCA cost recovery will be consistent with that of Resolution E-5114 (AMP Resolution).

2. Applicability

The PIPP Balancing Account applies to all residential CARE customers only and participating CCAs.

3. Rates

Utilities and participating CCAs will recover electric pilot costs through the Public Purpose Programs Charge.

4. Accounting Procedures

The Utility shall maintain the PIPPBA by making entries at the end of each month as follows:

- a. A debit entry equal to the total amount of the discounts given under the PIPP pilot program, including the commodity related discounts for participating CCA's, net of Franchise Fees and Uncollectibles (FF&U), for the month under the discount reflected in tariff Schedule PIPP Pilot;
- b. A credit entry equal to the revenue billed during the month from PPP revenue.
- c. An entry equal to amortization of the PIPPBA balance as authorized by the Commission;
- d. An entry to reflect any transfers to or from other regulatory accounts as authorized by the Commission; and
- e. A debit or credit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the entries above, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

(Continued)

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San Diego Gas & Electric Company
San Diego, California

Original Cal. P.U.C. Sheet No. 35970-E

Canceling Cal. P.U.C. Sheet No.

PRELIMINARY STATEMENTS

Sheet 2

II. BALANCING ACCOUNTS

PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT (PIPPBA)

5. Disposition

For the PIPPBA, the balance shall be recovered through the PPP rates in connection with SDG&E's annual PPP surcharge advice letter submittal.

Pursuant to Commission D.03-04-027, the Utility shall file by October 1 of each year an advice letter requesting to apply to the electric PPP rate effective January 1 of the following year 1) the net amortization component of electric PPP account balances and 2) the Commission's currently authorized program budget revenue requirements for the PPPs.

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2P6

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San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 35971-E

Canceling Revised Cal. P.U.C. Sheet No. 35697-E

PRELIMINARY STATEMENT

Sheet 3

III. MEMORANDUM ACCOUNTS
DESCRIPTION/LISTING OF ACCOUNTS

Listing of Accounts (Continued)

- Integration Capacity and Locational Net Benefit Analysis Memorandum Account (ICLNBMA)
- Wildfire Consumer Protections Memorandum Account (WCPMA)
- Adaptive Streetlight Implementation Memorandum Account (ASLIMA)
- Adaptive Streetlight Maintenance Memorandum Account (ASLMMA)
- Integrated Resource Plan Costs Memorandum Account (IRPCMA)
- General Rate Case Memorandum Account 2019 (GRCMA2019)
- Emergency Customer Protections Memorandum Account (ECPMA)
- Disadvantaged Communities Single Family Solar Homes Memorandum Account (DACSASHMA)
- Power Charge Indifference Adjustment Customer Outreach Memorandum Account (PCIACOMA)
- Officer Compensation Memorandum Account 2019 (OCMA2019)
- Fire Risk Mitigation Memorandum Account (FRMMA)
- Working Group Facilitator Memorandum Account (WGFMA)
- Third-Party Claims Memorandum Account (TPCMA)
- Covid-19 Pandemic Protections Memorandum Account (CPPMA)
- Climate Adaptation Vulnerability Assessment Memorandum Account (CAVAMA)
- Microgrid Memorandum Account (MGMA)
- Electric Vehicle Infrastructure Rule Memorandum Account (EVIMA)
- Cost of Capital Memorandum Account (CCMA)
- Percent of Income Payment Plan Memorandum Account (PIPPMA)

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PRELIMINARY STATEMENT

Sheet 1

III. MEMORANDUM ACCOUNTS

PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT (PIPPMA)

1. Purpose:

The Percentage of Income Payment Plan Memorandum Account (PIPPMA) is an interest-bearing memorandum account that is recorded on SDG&E's financial statements. Pursuant to Decision (D.) 21-10-012 OP 9 and OP 11, the purpose of the PIPPMA is to record all administrative costs associated with the PIPP Pilot program. Pursuant to D.21-10-012, page 66, specific administrative cost budgets are not authorized in this decision but rather, utilities will record all incremental administrative costs of the PIPP pilot in the PIPPMA, subject to a reasonableness review by the Commission. Incremental administrative costs of the PIPP pilot are costs incurred solely for the purpose of implementing the PIPP pilot and do not include costs that would have been incurred in the course of administering the CARE program or other existing responsibilities of the utilities or Community Choice Aggregators (CCAs). Additionally, third party facilitator and evaluation contractor costs are considered recoverable administrator costs and SDG&E will pay its share based on its proportional share of the pilot participation cap. If an eligible CCA opts to participate in the PIPP pilot program, then the CCA cost recovery will be consistent with that of Resolution E-5114 (AMP Resolution).

General costs that cannot be attributed specifically to either providing electric service or gas service will be allocated 73% to electric and 27% to gas.

2. Applicability:

The PIPP Memorandum Account applies to all residential CARE customers only and participating CCAs.

3. Rates:

Utilities will recover the electric pilot costs through the Public Purpose Programs Charge.

(Continued)

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PRELIMINARY STATEMENT

Sheet 2

III. MEMORANDUM ACCOUNTS

PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT (PIPPMA)

4. Accounting Procedure:

SDG&E shall maintain the PIPPMA by recording entries at the end of each month as follows, net of FF&U, where applicable:

- a. A debit entry to record incremental administrative operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes and return) associated with implementing the PIPP pilot program authorized in D.21-10-012;
- b. An entry to reflect any transfers to or from other regulatory accounts as authorized by the Commission; and
- c. A debit or credit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the entries above, at a rate equal to one-twelfth of the interest rate on the three-month nonfinancial Commercial Paper for the previous month, as reported in the federal Reserve Statistical Release, H.15, or its successor publication.

5. Disposition:

The disposition of the amounts in this account will be addressed in SDG&E's next general rate case or other applicable proceeding.

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SCHEDULE E-PIPP

Sheet 1

PERCENTAGE OF INCOME PAYMENT PLAN

APPLICABILITY

The Percentage of Income Payment Plan (PIPP) Pilot is a program available to enrolled California Alternate Rates for Energy (CARE) customers that meet the requirements as described herein and is taken in conjunction with the customer's otherwise applicable service schedule. The PIPP Pilot sets an eligible enrolled CARE customer's utility bill payment amounts at an affordable percentage of their monthly income. PIPP Pilot customers will receive a monthly bill cap as described in the Rates section below. The number of SDG&E PIPP Pilot participants are capped at 1,000 customers and is available to:

- 1) Enrolled CARE customers that are also either;
- 2) Located in one of the zip codes with the highest rates of recurring disconnections prior to the COVID-19 disconnection moratorium per Resolutions M-4842 and M-4849 as approved in Advice Letter 3941-E; or,
- 3) Have been disconnected 2 or more times during the 12 months prior to the COVID-19 disconnection moratorium (March 2019 to February 2020).

This schedule is not available to master metered customers and its sub-metered tenants, Direct Access customers, customers on Schedule E-SMOP (a smart meter is required for service on this schedule), customers enrolled in or participating in another pilot program, and/or customers enrolled in a Net Energy Metering schedule.

PIPP Pilot participants are eligible to participate in the Arrearage Management Payment (AMP) Plan if the AMP Plan Eligibility and Enrollment Criteria in SDG&E's Electric Rule 9 is met.

The PIPP Pilot will be available for 48 months (4 years) from the approval date of Advice Letter 3941-E.

TERRITORY

Within the entire territory served by the Utility.

(Continued)

1P9

Advice Ltr. No. 3941-E

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Dan Skopec
Vice President
Regulatory Affairs

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SCHEDULE E-PIPP

Sheet 2

PERCENTAGE OF INCOME PAYMENT PLAN

RATES

PIPP Pilot participants will receive a monthly bill cap for both current electricity and gas charges based on four percent (4%) of a standard monthly income based on the Federal Poverty Guidelines. Monthly bill caps will be standardized for households in two income tiers: 0-100% of Federal Poverty Guidelines, and 101-200% of Federal Poverty Guidelines. Electric service customers will be capped at three percent (3%) and gas service customers will be capped at one percent (1%).

The PIPP Pilot bill cap will be applied to a customer's bill prior to calculating any third-party taxes, charges, and fees and will appear as a line-item discount. The line-item discount will be either (a) the difference between the bill cap and the actual bill, or b) zero if the actual bill is lower than the bill cap.

SPECIAL CONDITIONS

ALL CUSTOMERS

1. Applicable Conditions. All special conditions contained in the customer's otherwise applicable schedule are applicable to service under this schedule.
2. Other Applicable Tariffs. Schedule E-CARE.
3. Commencement of PIPP Pilot Line-Item Discount. Eligible customers shall begin receiving the PIPP bill credit no later than one billing period after receipt of a completed and approved application by the Utility or as may otherwise be authorized by the Commission.
4. Income Eligibility. See Schedule E-CARE.
5. Income Verification and Reverification. PIPP Pilot participants must comply with Schedule E-CARE income verification and reverification rules. Information provided by the customer to the Utility is subject to verification as authorized by the Commission. Refusal or failure to provide documentation of eligibility acceptable to the Utility, upon request, shall result in the denial or termination of PIPP Pilot participation. See Schedule E-CARE

(Continued)

2P7

Advice Ltr. No. 3941-E

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SCHEDULE E-PIPP

PERCENTAGE OF INCOME PAYMENT PLAN

SPECIAL CONDITIONS (continued)

- 6. Moves or Discontinues Service. To remain enrolled in the PIPP Pilot, a customer will have 30 days from the date service is terminated to establish service at a new location. If service at a new location is established after 30 days service is terminated at the previous location, the customer will be removed from the PIPP Pilot and will receive a notice indicating how to apply to participate in the PIPP Pilot in other service territories or their current service territory.
- 7. CARE Removal. If a PIPP Pilot participant is removed from Schedule E-CARE for any reason, the participant is no longer eligible for the PIPP Pilot and will be removed immediately.
- 8. PIPP Bill Cap 0-100% of Federal Poverty Guidelines. Customers requesting this bill cap must prove their income within 90 days or they will be moved to a bill cap for participants at 101- 200% of Federal Poverty Guidelines.
- 9. PIPP Bill Cap 101-200% of Federal Poverty Guidelines. Customers requesting this bill cap will be subject to the CARE Post Enrollment Verification process. Participants will not be required to verify their income if it has been verified for CARE within the last two years.
- 10. CARE High Usage. PIPP Pilot participants are subject to the CARE High Usage rules.
- 11. Missed Payments. The PIPP Pilot bill cap is only applicable to current charges, not past-due amounts. Bill collection processes for missed payments still apply.
- 12. Dual Service: Eligible customers with both, gas and electric, service shall submit only one (1) application for the PIPP Pilot. Upon approval, the eligible customer will automatically be enrolled for the PIPP Pilot on both, gas and electric, services.

(Continued)

3P7

Advice Ltr. No. 3941-E

Decision No. 21-10-012

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PRELIMINARY STATEMENT

Sheet 2

IV. BALANCING ACCOUNTS
DESCRIPTION/LISTING OF ACCOUNTS

Listing of Accounts

- Curtailment Penalty Funds Account (CPFA)
- California Alternate Rates for Energy (CARE) Balancing Account
- Gas Energy Efficiency Balancing Account (GEEBA)
- Rewards & Penalties Balancing Account (RPBA)
- Pension Balancing Account (PBA)
- Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA)
- Core Fixed Cost Account (CFCA)
- Noncore Fixed Cost Account (NFCA)
- Post-2005 Gas Energy Efficiency Balancing Account (PGEEBA)
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- Integrated Transmission Balancing Account (ITBA)
- Hazardous Substance Cleanup Cost-Acct (HSCCA)
- On-Bill Financing Balancing Account (OBFBA)
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- Smart Meter Opt-Out Balancing Account (SMOBA)
- Low Carbon Fuel Standard Balancing Account (LCFSBA)
- Biomethane Cost Incentive Program Balancing Account (BCIPBA)
- Research, Development and Demonstration Balancing Account (RD&D)
- Natural Gas Leak Abatement Program Balancing Account (NGLAPBA)
- Customer Information System Balancing Account (CISBA)
- Transition, Stabilization and OCM Balancing Account (TSOBA)
- Liability Insurance Premium Balancing Account (LIPBA)
- School Energy Efficiency Stimulus Program Balancing Account (SEESPBA)
- Percentage of Income Payment Plan Balancing Account (PIPPBA)

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PRELIMINARY STATEMENTS

Sheet 1

IV. BALANCING ACCOUNTS

PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT (PIPPBA)

1. Purpose

The Percentage of Income Payment Plan Balancing Account (PIPPBA) is a two-way, interest bearing balancing account recorded on SDG&E's financial statements pursuant to Decision (D.) 21-10-012, OP 9 and OP 10. The purpose of the PIPP Balancing Account is to record customer bill discounts associated with the PIPP pilot program.

2. Applicability

The PIPP Balancing Account applies to all residential CARE customers only.

3. Rates

Utilities will recover gas pilot costs from all gas customers in transportation rates on an equal-cents-per-therm basis.

4. Accounting Procedures

The Utility shall maintain the PIPPBA by making entries at the end of each month as follows:

- a. A debit entry equal to the total of the discounts, net of Franchise Fees and Uncollectibles (FF&U), for the month under the discount reflected in tariff Schedule PIPP Pilot;
- b. A credit entry equal to the authorized revenue as authorized by the Commission.
- c. An entry equal to amortization of the PIPPBA balance as authorized by the Commission;
- d. An entry to reflect any transfers to or from other regulatory accounts as authorized by the Commission; and
- e. A debit or credit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the entries above, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

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San Diego Gas & Electric Company
San Diego, California

Original Cal. P.U.C. Sheet No. 25784-G

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PRELIMINARY STATEMENTS

Sheet 2

IV. BALANCING ACCOUNTS

PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT (PIPPBA)

5. Disposition

SDG&E will amortize the projected year-end balance in the PIPPBA in customers' gas transportation rates in connection with its annual regulatory account update advice letter submittal by October 31. The balance will be allocated on an Equal Cents Per Therm (ECPT) basis.

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Sheet 2

V. MEMORANDUM ACCOUNTS
DESCRIPTION/LISTING OF ACCOUNTS

Listing of Accounts

- Catastrophic Event Memorandum Account (CEMA)
- Core Reclassification Shortfall Memorandum Account (CRSMA)
- Liquefied Natural Gas Service Tracking Account (LNGSTA)
- Self-Generation Program Memorandum Account (SGPMA)
- FERC Settlements Proceeds Memorandum Account (FSPMA)
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- Pipeline Safety and Reliability Memorandum Account (PSRMA)
- California Solar Initiative Thermal Program Memorandum Account (CSITPMA)
- 2012 – 2014 Energy Savings Assistance Programs Memorandum Account (ESAPMA)
- Energy Data Request Memorandum Account (EDRMA)
- Residential Disconnect Memorandum Account (RDMA)
- Greenhouse Gas Administrative Costs Memorandum Account (GHGACMA)
- Deductible Tax Repairs Benefits Memorandum Account (DTRBMA)
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- Pipeline Safety Enhancement Plan - Phase 2 Memorandum Account (PSEPMA)
- Officer Compensation Memorandum Account (OCMA)
- Tax Memorandum Account (TMA)
- Avoided Cost Calculator Update Memorandum Account (ACCUMA)
- Customer Information System Memorandum Account (CISMA)
- Dairy Biomethane Solicitation Development Memorandum Account (DBSDMA)
- Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA)
- Wildfire Consumer Protections Memorandum Account (WCPMA)
- Line 1600 Records Audit Memorandum Account (L1600RAMA)
- General Rate Case Memorandum Account 2019 (GRCMA2019)
- Emergency Customer Protections Memorandum Account (ECPMA)
- Officer Compensation Memorandum Account 2019 (OCMA2019)
- Core Gas Balancing Memorandum Account (CGBMA)
- California Consumer Privacy Act Memorandum Account (CCPAMA)
- COVID-19 Pandemic Protections Memorandum Account (CPPMA)
- Residential Disconnection Protections Memorandum Account (RDPMA)
- Medium-Large Commercial And Industrial COVID-19 Disconnection Memorandum Account (CDMMA)
- Cost of Capital Memorandum Account (CCMA)
- Percent of Income Payment Plan Memorandum Account (PIPPMA)

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NOTE: For information relating to the Hazardous Substance Memorandum Account (HSMA), which is part of the Hazardous Substance Cleanup Cost Account (HSCCA), see Section VIII.

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PRELIMINARY STATEMENTS

Sheet 1

V. MEMORANDUM ACCOUNTS

PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT (PIPPMA)

1. Purpose:

The Percentage of Income Payment Plan Memorandum Account (PIPPMA) is an interest-bearing memorandum account that is recorded on SDG&E's financial statements. Pursuant to Decision (D.) 21-10-012 OP 9 and OP 11, the purpose of the PIPPMA is to record all administrative costs associated with the PIPP Pilot program. Pursuant to D.21-10-012, page 66, specific administrative cost budgets are not authorized in this decision but rather, utilities will record all incremental administrative costs of the PIPP pilot in the PIPPMA, subject to a reasonableness review by the Commission. Incremental administrative costs of the PIPP pilot are costs incurred solely for the purpose of implementing the PIPP pilot and do not include costs that would have been incurred in the course of administering the CARE program or other existing responsibilities of the utilities. Additionally, third party facilitator and evaluation contractor costs are considered recoverable administrator costs and SDG&E will pay its share based on its proportional share of the pilot participation cap.

General costs that cannot be attributed specifically to either providing electric service or gas service will be allocated 73% to electric and 27% to gas.

2. Applicability:

The PIPP Memorandum Account applies to all residential CARE customers only.

3. Rates:

Utilities will recover gas pilot costs from all gas customers in transportation rates on an equal-cents-per-therm basis.

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PRELIMINARY STATEMENTS

Sheet 2

V. MEMORANDUM ACCOUNTS

PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT (PIPPMA)

4. Accounting Procedure:

SDG&E shall maintain the PIPPMA by recording entries at the end of each month as follows, net of FF&U, where applicable:

- a. A debit entry to record incremental administrative operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes and return) associated with implementing the PIPP pilot program authorized in D.21-10-012;
- b. An entry to reflect any transfers to or from other regulatory accounts as authorized by the Commission; and
- c. A debit or credit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the entries above, at a rate equal to one-twelfth of the interest rate on the three-month nonfinancial Commercial Paper for the previous month, as reported in the federal Reserve Statistical Release, H.15, or its successor publication.

5. Disposition:

The disposition of the amounts in this account will be addressed in SDG&E's next general rate case or other applicable proceeding.

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SCHEDULE G-PIPP

Sheet 1

PERCENTAGE OF INCOME PAYMENT PLAN

APPLICABILITY

The Percentage of Income Payment Plan (PIPP) Pilot is a program available to enrolled California Alternate Rates for Energy (CARE) customers that meet the requirements as described herein and is taken in conjunction with the customer's otherwise applicable service schedule. The PIPP Pilot sets an eligible enrolled CARE customer's utility bill payment amounts at an affordable percentage of monthly income. PIPP Pilot customers will receive a monthly bill cap as described in the Rates section below. The number of SDG&E PIPP Pilot participants are capped at 1,000 customers and is available to:

- 1) Enrolled CARE customers that are also either;
- 2) Located in one of the zip codes with the highest rates of recurring disconnections prior to the COVID-19 disconnection moratorium per Resolutions M-4842 and M-4849 as approved in Advice Letter 3058-G; or,
- 3) Have been disconnected 2 or more times during the 12 months prior to the COVID-19 disconnection moratorium (March 2019 to February 2020).

This schedule is not available to master metered customers and its sub-metered tenants, Direct Access customers, customers on Schedule G-SMOP (a smart meter is required for service on this schedule), customers enrolled in or participating in another pilot program, and/or customers enrolled in a Net Energy Metering schedule.

PIPP Pilot participants are eligible to participate in the Arrearage Management Payment (AMP) Plan if the AMP Plan Eligibility and Enrollment Criteria in SDG&E's Gas Rule 9 is met.

The PIPP Pilot will be available for 48 months (4 years) from the approval date of Advice Letter 3058-G.

TERRITORY

Within the entire territory served by the Utility.

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SCHEDULE G-PIPP

Sheet 2

PERCENTAGE OF INCOME PAYMENT PLAN

RATES

PIPP Pilot participants will receive a monthly bill cap for both current electricity and gas charges based on four percent (4%) of a standard monthly income based on the Federal Poverty Guidelines. Monthly bill caps will be standardized for households in two income tiers: 0-100% of Federal Poverty Guidelines, and 101-200% of Federal Poverty Guidelines. Electric service customers will be capped at three percent (3%) and gas service customers will be capped at one percent (1%).

The PIPP Pilot bill cap will be applied to a customer's bill prior to calculating any third-party taxes, charges, and fees and will appear as a line-item discount. The line-item discount will be either (a) the difference between the bill cap and the actual bill, or b) zero if the actual bill is lower than the bill cap.

SPECIAL CONDITIONS

ALL CUSTOMERS

1. Applicable Conditions. All special conditions contained in the customer's otherwise applicable schedule are applicable to service under this schedule.
2. Other Applicable Tariffs. Schedule G-CARE.
3. Commencement of PIPP Pilot Line-Item Discount. Eligible customers shall begin receiving the PIPP bill credit no later than one billing period after receipt of a completed and approved application by the Utility or as may otherwise be authorized by the Commission.
4. Income Eligibility. See Schedule G-CARE.
5. Income Verification and Reverification. PIPP Pilot participants must comply with Schedule G-CARE income verification and reverification rules. Information provided by the customer to the Utility is subject to verification as authorized by the Commission. Refusal or failure to provide documentation of eligibility acceptable to the Utility, upon request, shall result in the denial or termination of PIPP Pilot participation. See Schedule G-CARE.

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SCHEDULE G-PIPP

Sheet 3

PERCENTAGE OF INCOME PAYMENT PLAN

SPECIAL CONDITIONS (continued)

- 6. Moves or Discontinues Service. To remain enrolled in the PIPP Pilot, a customer will have 30 days from the date service is terminated to establish service at a new location. If service at a new location is established after 30 days service is terminated at the previous location, the customer will be removed from the PIPP Pilot and will receive a notice indicating how to apply to participate in the PIPP Pilot in other service territories or their current service territory.
- 7. CARE Removal. If a PIPP Pilot participant is removed from Schedule G-CARE for any reason, the participant is no longer eligible for the PIPP Pilot and will be removed immediately.
- 8. PIPP Bill Cap 0-100% of Federal Poverty Guidelines. Customers requesting this bill cap must prove their income within 90 days or they will be moved to a bill cap for participants at 101- 200% of Federal Poverty Guidelines.
- 9. PIPP Bill Cap 101-200% of Federal Poverty Guidelines. Customers requesting this bill cap will be subject to the CARE Post Enrollment Verification process. Participants will not be required to verify their income if it has been verified for CARE within the last two years.
- 10. CARE High Usage. PIPP Pilot participants are subject to the CARE High Usage rules.
- 11. Missed Payments. The PIPP Pilot bill cap is only applicable to current charges, not past-due amounts. Bill collection processes for missed payments still apply.

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Ordering Paragraph (OP) 1 of the Percentage of Income Payment Plan (PIPP) Decision authorizes San Diego Gas & Electric (SDG&E) to implement the PIPP Pilot in accordance with the parameters outlined in Attachment A of the PIPP Decision. In addition, OP 2 of the PIPP Decision directs SDG&E to submit a Tier 3 Advice Letter to establish the PIPP Pilot and associated PIPP regulatory account mechanisms. Furthermore, OP 3 of the PIPP Decision directs eligible Community Choice Aggregators (CCAs), who opt to participate in a utility PIPP Pilot program to jointly file the Tier 3 PIPP Implementation Advice Letter with the applicable utility. In accordance with these directives, SDG&E submits this PIPP Pilot Implementation Plan for Commission consideration and approval.

A. Goal:

The goal for Decision 21-10-012 (PIPP Decision) is to test whether a PIPP program can: (i) reduce the number of low-income households at risk of disconnection, (ii) encourage participation in energy saving and energy management programs, (iii) increase access to essential levels of energy service, and (iv) control program costs.

B. Pilot Size:

The PIPP Decision caps SDG&E's PIPP Pilot participation at 1,000 participants with a target enrollment level of 500 participants for SDG&E's service territory within the first six months after pilot enrollment begins.¹

The PIPP Decision also authorizes the participation of CCAs in a utility's PIPP Pilot if participating CCAs agree to certain participation requirements (as detailed further herein) and notifies the utility with a copy to the service list within 30 days of the effective date of the decision.² Both of the currently active CCAs in SDG&E's service territory, Clean Energy Alliance (CEA) and San Diego Community Power (SDCP), notified SDG&E and the service list of their intent to participate in the PIPP Pilot on October 25, 2021 and November 11, 2021 respectively. Per the PIPP Decision, the CCA PIPP Pilot participation target shall be proportional to the utility's participation cap based on the CCA's projected share of customers in the utility's service territory and shall count toward the utility's participation cap.³

The PIPP Decision authorizes SDG&E to commence the PIPP Pilot on the later of July 1, 2022 or 45 days after the approval of the PIPP Implementation Advice Letter.⁴ If the PIPP Pilot is launched on July 1, 2022, the projected proportional share between CEA, SDCP, and SDG&E will be substantively different than 2023 because a majority of SDG&E customers will transition during that time from SDG&E to a CCA as their service provider.⁵ Consequently, SDG&E, SDCP, and CEA have agreed to calculate and allocate

¹ Decision 21-10-012 at page 13, OP 1, Page 1 of Attachment A.

² OP 3 and Pg. 3 Attachment A, Paragraph 5d, Decision 21-10-012.

³ Pg. 3 Attachment A, Paragraph 5e, Decision 21-10-012.

⁴ D.21-10-012 at 38, Conclusion of Law (COL) 13d, and Attachment A, Section 7d at 4.

⁵ CCA expansion plans through 2023 are on file with the Commission as "San Diego Community Power Addendum No. 1 to the Community Choice Aggregation Implementation Plan and Statement of Intent to Address Expansion to

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the proportional share of the 1,000 PIPP Pilot participant enrollment cap using 2023 projections for the duration of the 48-month pilot. SDG&E along with SDCP and CEA agree that in order to accommodate future CCA expansion, SDG&E, SDCP and CEA will continue to work together to support PIPP participation enrollment levels based on changes in the share of customers served by SDCP and CEA SDG&E’s service territory. Therefore, SDG&E, SDCP, and CEA propose the following participation caps as a starting point with the flexibility to pivot from these caps, within the 1,000 participant cap, to accommodate future CCA expansion as well as any potential movement of PIPP Pilot participants within SDG&E and its CCA energy partners’ service territories during the 4-year PIPP Pilot.

Table A. Proportional Share of SDG&E Enrollment Participation Cap

Column (A) Service Provider	Column (B) Projected Proportional Share	Column (C) Customer Enrollment Participation Cap
CEA	10%	100
SDG&E	25%	250
SDCP	65%	650
Total (bundled + unbundled)	100%	1,000

The projected proportional percentage share for each service provider’s eligible population (Column B) was calculated by dividing the number of residential meters that each CCA is projected to have in 2023 by the total number of residential meters in the service territory.

The Customer Enrollment Participation Cap targets (Column C) for each service provider was calculated by multiplying the total SDG&E enrollment cap of 1,000 by the respective Projected Proportional Share percentage (Column B).

The PIPP Decision directs CCAs to propose target enrollment levels in this joint advice letter filing. The CCA target enrollment levels are based on the same methodology used to develop the PIPP participation targets above, in Table A. SDG&E, SDCP, and CEA have agreed to allocate the 500 target enrollment level for the SDG&E service territory proportionally, using 2023 customer load projections. These targets are included to help inform enrollment progress and ME&O effectiveness in each part of SDG&E’s service territory.

Table B. Proposed Target Enrollment Levels

Column (A) Service Provider	Column (B) Projected Proportional Share	Column (C) Proposed Target Enrollment Levels
CEA	10%	50
SDG&E	25%	125

the City of National City and the Unincorporated Areas of San Diego County.” and “Clean Energy Alliance Addendum No. 1 to the Community Choice Implementation Plan and Statement of Intent to Address Expansion to the Cities of Escondido and San Marcos.”

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SDCP	65%	325
Total (bundled + unbundled)	100%	500

C. Customer Eligibility:

Pursuant to Section 3 of Attachment A in the PIPP Decision, SDG&E and its participating CCAs will use the following PIPP Pilot customer eligibility guidelines:

1. PIPP Pilot will be limited to customers who are enrolled in the California Alternate Rates for Energy (CARE) program, and who either: (i) are located in one of the zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium, or (ii) have been disconnected two or more times during the 12 months prior to the disconnections moratorium.

Tables B through D below list the proposed zip codes representing the highest rates of recurring disconnection for PIPP Pilot eligibility for CEA, SDG&E, and SDCP in section 1. (i) above. As discussed previously, the zip codes are representative of the expected service provider at the end of 2023 due to the transition of a majority of SDG&E's customers in 2022. Since CCA territories are determined by town code, rather than zip code, some zip codes may span multiple town codes. This is not an error, instead it is an indicator that the zip code is serviced by two different providers, which will be differentiated by town codes during pilot enrollment.

Additionally, the proposed zip codes meet the PIPP Decision requirement to propose eligible high recurring disconnection rate zip codes within the CCA's service territory regardless of whether the utility proposed the same high disconnection zip codes.⁶

2. Each service provider selected zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium, based on utility data. The number of zip codes selected was determined by the number of CARE-eligible customers in the selected zip codes, such that each service provider could meet target enrollment levels within six months after pilot enrollment begins and for the duration of the pilot.
3. The pilot will exclude: (i) master-metered operators and its sub-metered tenants, (ii) direct access customers, (iii) customers who do not have a SmartMeter, (iv) customers who are enrolled in any other pilot, and (v) customers enrolled in net energy metering rates.

SDG&E's PIPP Pilot will adhere to the exclusions for PIPP Pilot participation as outlined above.

4. As directed in the PIPP Decision⁷, if a customer moves within the SDG&E service territory, continues to meet PIPP eligibility requirements stated above and establishes service at a new location within 30 days of terminating service at the previous location, the customer will remain enrolled in the PIPP Pilot. Otherwise, the customer will be removed from the PIPP Pilot and will receive notice of how to re-apply to participate in the PIPP Pilot if they are interested.

⁶ D. 21-10-012 at COL 11f, Attachment A; Section 5e at 3.

⁷ Pg. 2 Attachment A, Paragraph 3d, Decision 21-10-012.

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5. Utilities may limit pilot participation to customers enrolled in the most commonly enrolled residential rates.

SDG&E’s PIPP Pilot will not limit participation to customers enrolled in the most commonly enrolled residential rates with the exception of those as noted in C. 3. above.

Table C. Eligible Zip Codes proposed by Clean Energy Alliance (CEA)

Count	Zip Code	City Name
1	92008	CARLSBAD
2	92009	CARLSBAD & RANCHO LA COSTA
3	92010	CARLSBAD
4	92011	CARLSBAD
5	92014	DEL MAR
6	92025	ESCONDIDO
7	92026	ESCONDIDO
8	92027	ESCONDIDO
9	92029	ESCONDIDO
10	92069	SAN MARCOS
11	92078	SAN MARCOS
12	92075	SOLANA BEACH

Table D. Eligible Zip Codes proposed by San Diego Gas & Electric (SDG&E)

Count	Zip Code	City Name
1	91945	LEMON GROVE
2	92054	OCEANSIDE
4	92057	OCEANSIDE/SAN LUIS REY
5	92071	SANTEE
6	92081	VISTA
7	92651	SOUTH LAGUNA
7	92656	LAGUNA HILLS/ALISO VIEJO
8	92672	SAN CLEMENTE
9	92677	LAGUNA NIGUEL
10	92691	MISSION VIEJO

Table E. Eligible Zip Codes proposed by San Diego Community Power (SDCP)

Count	Zip Code	City Name	Count	Zip Code	City Name
1	91901	ALPINE	41	92061	PAUMA VALLEY
2	91902	BONITA	42	92065	RAMONA
3	91905	BOULEVARD	43	92067	RANCHO SANTA FE
4	91906	CAMPO	44	92070	SANTA YSABEL

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5	91910	CHULA VISTA	45	92078	SAN MARCOS
6	91911	CHULA VISTA	46	92082	VALLEY CENTER
7	91913	CHULA VISTA	47	92083	VISTA
8	91914	CHULA VISTA	48	92084	VISTA
9	91915	CHULA VISTA	49	92086	WARNER SPRINGS
10	91916	DESCANSO	50	92091	RANCHO SANTA FE
11	91917	DULZURA	51	92101	SAN DIEGO
12	91931	GUATAY	52	92102	SAN DIEGO
13	91932	IMPERIAL BEACH	53	92103	SAN DIEGO
14	91934	JACUMBA	54	92104	SAN DIEGO
15	91935	JAMUL	55	92105	SAN DIEGO
16	91941	LA MESA	56	92106	SAN DIEGO
17	91942	LA MESA	57	92107	SAN DIEGO
18	91948	MOUNT LAGUNA	58	92108	SAN DIEGO
19	91950	NATIONAL CITY	59	92109	SAN DIEGO
20	91962	PINE VALLEY	60	92110	SAN DIEGO
21	91963	POTRERO	61	92111	SAN DIEGO
22	91977	SPRING VALLEY	62	92113	SAN DIEGO
23	91978	SPRING VALLEY	63	92114	SAN DIEGO
24	91980	TECATE	64	92115	SAN DIEGO
25	92003	BONSALL	65	92116	SAN DIEGO
26	92007	CARDIFF	66	92117	SAN DIEGO
27	92019	EL CAJON	67	92119	SAN DIEGO
28	92020	EL CAJON	68	92121	SAN DIEGO
29	92021	EL CAJON	69	92122	SAN DIEGO
30	92024	ENCINITAS	70	92123	SAN DIEGO
31	92025	ESCONDIDO	71	92124	SAN DIEGO
32	92026	ESCONDIDO	72	92126	SAN DIEGO
33	92027	ESCONDIDO	73	92127	SAN DIEGO
34	92028	FALLBROOK	74	92128	SAN DIEGO
35	92029	ESCONDIDO	75	92129	SAN DIEGO
36	92036	JULIAN	76	92130	SAN DIEGO
37	92037	LA JOLLA	77	92131	SAN DIEGO
38	92040	LAKESIDE	78	92139	SAN DIEGO
39	92058	OCEANSIDE	79	92154	SAN DIEGO
40	92059	PALA	80	92173	SAN YSIDRO

D. Income Eligibility Verification:

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Pursuant to Section 4 in Attachment A of the PIPP Decision, the following PIPP Pilot income verification and reverification provisions will apply for PIPP Pilot participants:⁸

1. PIPP Pilot participants must comply with CARE income verification and reverification rules;
2. Any participant that is removed from the CARE program shall also be removed from the PIPP Pilot;
3. Participants who request a bill cap for 0-100% of Federal Poverty Guidelines must prove their income within 90 days or they will be moved to a bill cap for participants at 101-200% of Federal Poverty Guidelines;
4. Participants who request a bill cap for 101-200% of Federal Poverty Guidelines will be subject to the CARE post-enrollment verification processes;
5. Participants will not be required to verify their income if they have verified their income for CARE within the past two years;
6. Utilities will contract with community-based organizations to provide upfront income verification services for PIPP Pilot during pilot intake and enrollment if such community-based organizations currently provide upfront income verification services for CARE and/or ESAP; and
7. The PIPP Pilot will rely on the CARE income reverification processes and will not have separate income reverification requirements.

E. Community Choice Aggregator Eligibility and Participation Requirements:

Pursuant to the PIPP Decision, the following provisions will apply for CCA participation in the PIPP Pilot:⁹

1. Both CEA and SDCP at time of the PIPP Decision participated in AMP in accordance with AMP Resolution E-5114 and will continue to participate in AMP for the duration of PIPP Pilot.
2. The CCA cost recovery proposal outlined in the Cost Recovery section of this Implementation Plan is consistent with AMP Resolution E-5114.
3. Pilot enrollment, income verification, and billing will be administered by SDG&E for the CCAs. SDG&E will provide sufficient data to each participating CCA in weekly reports to facilitate CCA billing of PIPP Pilot participation.
4. The CCAs will participate in the PIPP working group and will jointly file with the applicable Tier 3 advice letter within 120 days of the final decision. The Tier 3 advice letter will include proposal for target enrollment level, eligible high recurring disconnection rate zip codes, a marketing, education and outreach plan, and a proposed budget.
5. The CCA pilot participation target shall be proportional to the utility's participation cap (based on the CCA's projected share of customers in the utility's service territory) and shall count toward the utility's participation cap.
6. The CCAs may propose eligible high recurring disconnection rate zip codes within each participating CCA's service territory regardless of whether the utility proposes the same high recurring disconnection rate zip codes.

⁸ Pg. 80, Conclusions of Law, Paragraph 6a – 6g, Decision 21-10-012.

⁹ Pg. 2-3, Attachment A, Section 5a-5f, Decision 21-10-012.

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F. Taxes and Fees:

The PIPP Decision dictates that the PIPP bill cap will be applied to a customer's bill prior to calculating any third-party taxes, charges, and fees.¹⁰ SDG&E's PIPP Pilot will adhere to the PIPP Decision requirements regarding the application of taxes and fees.

G. Duration and Timeline:

Tracking target enrollment levels (500 participants) and enrollment level caps (1,000 participants) will begin day of launch and will continue for the 48-month duration of the pilot.¹¹ SDG&E will enroll its target number of participants (500) during the first 6 months of pilot launch¹² and participation by CEA and SDCP customers will count towards both the target enrollment level and participation cap. The enrollment targets for CEA and SDCP are proportional to the utility's participation cap based on the CCA's projected share of customers in the utility's service territory, for the 48-month duration of the pilot and will count towards the utility's participation cap (1,000 participants).¹³

Within 7 months after the launch of the pilot and every 6 months thereafter, SDG&E, CEA and SDCP will file and serve to the service list of the proceeding a report with evaluation metrics covering previous 6 months of pilot data. If there is any significant shortfall in enrollments below target enrollment levels (Table B), SDG&E or CEA or SDCP will explain the shortfall and the plan to remedy the shortfall¹⁴.

The evaluation contractor will complete the PIPP evaluation report within 25 months after all PIPP implementation advice letters have been approved, based on at least the first 18 months of pilot data.¹⁵ Within 25 months of the approval of the PIPP pilot program advice letter the evaluation report will be completed and served to the service list of the proceeding.¹⁶

If the evaluation report recommends modifications to the pilot program, SDG&E will file a Tier 2 Advice Letter within 60 days of the service of the evaluation report to implement the modifications recommended by the PIPP pilot evaluation report.¹⁷

If the pilot evaluation report finds that the pilot achieved the goals established in the decision or shows significant potential to achieve the decision goals with modifications, then (i) the pilot working group will file and serve recommendations for the long-term PIPP program design within 4 months after the evaluation report is served, and (ii) Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company will file joint application for

¹⁰ Pg. 3, Attachment A, Section 6, Decision 21-10-012.

¹¹ Pg. 1 Attachment A, Paragraph 2, Decision 21-10-012.

¹² Pg. 4 Attachment A, Paragraph 7e, Decision 21-10-012.

¹³ Pg. 3 Attachment A, Paragraph 5e, Decision 21-10-012.

¹⁴ Pg. 90 Ordering Paragraph 5, Decision 21-10-012.

¹⁵ Pg.4 Attachment A, Paragraph 7g, Decision 21-10-012.

¹⁶ Pg. 90 Ordering Paragraph 6, Decision 21-10-012.

¹⁷ Pg. 90-91 Ordering Paragraph 7, Decision 21-10-012.

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a long-term PIPP program within 7 months after the evaluation report is served, and shall serve a courtesy copy of the joint application to the service list of this proceeding.¹⁸

H. Bill Caps:

SDG&E will use SDG&E’s customer information system to implement the following:

1. Cap a participant’s bill at 4% of household income for both electricity and gas using the following standard assumptions: household size of 3 people; reference income of 50% of Federal Poverty Guidelines for households with incomes between 0-100% of Federal Poverty Guidelines; and reference income of 150% of Federal Poverty Guidelines for households with incomes between 101- 200% of Federal Poverty Guidelines.

Table F: Statewide IOU CARE Electric & Gas Bill Splits

Statewide IOU CARE Electric & Gas Bill Splits			
Ratio of Bill Charges (Electric/Gas)	75/25	75.68/24.32	Proposed
0-100% of FPG PIPP Cap	\$37.00	\$37.00	\$37.00
Electric Bill Cap	\$27.75	\$28.00	\$28.00
Gas Bill Cap	\$9.25	\$9.00	\$9.00
101-200% of FPG PIPP Cap	\$109.00	\$109.00	\$109.00
Electric Bill Cap	\$81.75	\$82.00	\$82.00
Gas Bill Cap	\$27.25	\$27.00	\$27.00

2. Update bill caps annually to reflect current income guidelines, concurrently with CARE program income guideline updates, provided that bill caps will not be adjusted during the first six months after the pilots are launched.
3. Implement the PIPP bill caps as a line-item bill discount, and the bill discount will be either (a) the difference between the bill cap and the actual bill, or b) zero if the actual bill is lower than the bill cap.
4. SDG&E, in alignment with PG&E, SCE, and SoCalGas, proposes a statewide electric/gas split of the 4% total bill cap to be allocated to electric and gas fuel bills 75% and 25%, respectively. Or said differently, the 4% bill cap will equate to a 3% bill cap for electric bills and a 1% bill cap for gas bills using the same income and household assumptions noted above. Furthermore, a single

¹⁸ Pg. 91 Ordering Paragraph 7, Decision 21-10-012.

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fuel customer will also be subject to a 3% bill cap for single fuel electric bills and a 1% bill cap for single fuel gas bills.¹⁹

I. Energy Usage:

Utilities will contract with community-based organizations that conduct ESAP and/or Low-Income Home Energy Assistance Program (LIHEAP) outreach to perform concurrent PIPP pilot outreach.

PIPP Pilot participants who use 400% of baseline will have to follow the CARE program certification and recertification process for high usage rules.

J. Missed Payments and Arrearages:

The PIPP bill caps only apply to current charges and not past-due charges.²⁰ SDG&E will follow the normal business processes for addressing customer's missed payments. If a PIPP pilot customer misses their payment, like a non-pilot customer, they will receive a notification. PIPP Pilot customer will follow the same dunning and credit treatment steps as any other customer.

A PIPP Pilot customer is eligible to enroll in AMP if they meet the requirements.

K. Marketing, Education, and Outreach (ME&O):

SDG&E will take the following initial steps to provide marketing and outreach efforts to enroll eligible customers in the PIPP Pilot. In order to help customers manage their utility bills, SDG&E plans to promote the PIPP Pilot using a targeted, multi-step approach through a variety of channels. At pilot inception, to ensure information is available and easy to find, SDG&E will have a dedicated PIPP webpage including requirements, benefits, and FAQ's and will link to relevant assistance pages on sdge.com. During the initial enrollment stage, SDG&E plans to send targeted communications, such as direct mail and email in English and Spanish, to eligible CARE/FERA customers, to provide awareness of the PIPP Pilot and promote enrollment.

Current marketing and outreach efforts to CARE/FERA customers will be reviewed to determine where secondary PIPP messaging can be included to help raise awareness for at-risk customers in select zip codes. As space permits, secondary messaging about PIPP will be included in printed material and other collateral email. Relevant PIPP information will be also provided to specific CBOs that serve the most at-risk communities to help communicate program benefits and requirements. These CBOs will be able to inform customers of PIPP when conducting outreach for CARE, ESAP, AMP, or other assistance programs. As needed, customers can call SDG&E's Customer Care Center (CCC) to speak with an Energy Service Specialist (ESS) with questions and receive enrollment assistance. Additionally, the pilot will be

¹⁹ At the time in submitting the Advice Letter, SDG&E nor the participating CCAs have customers served by two utilities for electricity and gas that met the eligible population criteria, and therefore omit a strategy for bill caps split into separate bill caps for electric and gas service.

²⁰ Pg.5 Attachment A, Paragraph 10, Decision 21-10-012.

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offered to eligible customers before disconnecting a customer.²¹ As part of this ME&O plan, SDG&E will collaborate with CCAs to ensure information made available to potential PIPP customers is consistent. SDG&E plans to monitor campaign engagement and enrollment levels and adjust ME&O strategy accordingly.

L. Cost Recovery:

SDG&E requests the creation of PIPP Balancing Accounts and PIPP Memorandum Accounts to track PIPP Pilot costs separately for electric and gas customers.

SDG&E intends to recover electric costs in rates via the Public Purpose Program (PPP) rate component from all customer classes, excluding lighting customers, on an equal cent per kWh based on current authorized sales, similar to the approved allocation to recover other low-income programs authorized in the 2019 General Rate Case Phase 2 decision, D.21-07-010. Pursuant to D.21-10-012, CARE customers will not be exempted from paying the costs of the PIPP pilots²². SDG&E intends to include subsidy balances recorded in the electric PIPP Balancing Account in SDG&E's annual PPP advice letter filing in September for implementation in rates the following year.

Bundled and unbundled customers pay the same PPP rates. The cost recovery will be the same for bundled and unbundled customers. Consistent with AMP Resolution E-5114, SDG&E will jointly recover both IOU and CCA costs associated with customer PIPP bill caps through the PPP Charge and subsequently remit to SDCP and CEA the amount of recovered costs attributable to generation-related CCA costs. Following the first operational year of the PIPP pilot SDG&E will begin remittance of recovered costs to each participating CCA on a monthly basis.

SDG&E intends to recover gas costs in rates via the transportation rate component from all customer classes on an equal cent per therm basis. SDG&E intends to include subsidy balances recorded in the gas PIPP Balancing Account in SDG&E's annual Regulatory Accounts Update advice letter filing in October for implementation in rates the following year.

SDG&E intends to seek recovery of balances recorded in the electric and gas PIPP Memorandum Accounts in a future General Rate Case (GRC) or other appropriate regulatory proceeding.

²¹ Pg.6, Attachment A, Paragraph 11f, Decision 21-10-012.

²² Pg, 67, D.21-07-010.

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See SDG&E’s estimated PIPP Pilot costs during the 4-year pilot below:

Table G. San Diego Gas & Electric (SDG&E) Estimated PIPP Pilot Budget ²³

Cost Name	Estimated Range of Expenses
Planned administration ²⁴	\$400,000 - \$1,000,000
Marketing, Education & Outreach	\$120,000 - \$170,000
Billing System	\$3,500,000 - \$5,500,000
Gas and Electric Subsidy Recovery	\$650,000 - \$8,300,000
Total	\$4,670,000 - \$14,970,000

M. Working Group:

SDG&E joined PG&E, SCE, and SoCalGas, all participating CCAs, and other interested stakeholders in participating in a Working Group²⁵, facilitated by the third-party, Barakat Consulting Incorporated, hired by SCE. The working group met on 12/06/21, 12/20/21, 1/10/22 and 1/24/22. Stakeholders provided feedback on a variety of PIPP Pilot implementation details including the identification of eligible high recurring disconnection rate zip codes, marketing and outreach plans, bill cap implementation, the evaluation plan, and details around cost recovery. SDG&E considered the feedback received and this plan incorporates much of the feedback.

N. Evaluation Report:

An evaluation consultant will be procured to conduct a statewide evaluation of the Pilot. The evaluation will utilize data collected on Pilot participants and a comparison group of similar nonparticipant customers to assess Pilot impacts. The consultant will produce a written report of the evaluation within 25 months from pilot commencement. At a minimum, the evaluation report will address the questions proposed in the PIPP Decision.²⁶ SDG&E acknowledges that Cal Advocates shared some thoughts on potential additional evaluation criteria and looks forward to considering these ideas further during working sessions with the evaluation consultant and other interested parties.

²³ Estimated budgets include estimated costs for SDG&E, SDCP, and CEA for the duration of the 4-year PIPP Pilot.

²⁴ Estimated administration costs does not include evaluation costs.

²⁵ Pg. 87, Conclusions of Law, Paragraph 29b, D.21.10.012.

²⁶ Pg.7, Attachment A, Paragraph 14a-14n, Decision 21-10-012.