

## DRA

Division of Ratepayer Advocates  
California Public Utilities Commission

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September 18, 2013  
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**Subject: Withdrawal of DRA's Protest to PG&E's Advice Letter 3385-G/4224-E**

Dear Mr. Randolph,

The purpose of this letter is to inform the Commission that the Division of Ratepayer Advocates ("DRA") withdraws its Protest dated June 3, 2013, of Pacific Gas and Electric Company's ("PG&E") Advice Letter 3385-G/4224-E ("Protest"). This withdrawal is based on a mutual agreement between PG&E and DRA (collectively referred to as the "Parties"), described below.

### **Background:**

PG&E filed Advice Letter 3385-G/4224-E on May 14, 2013 in compliance with the directive from the Energy Division dated April 1, 2013 that ordered all energy investor-owned utilities (IOUs) and small multi-jurisdictional owned utilities providing energy service under the California Alternative Rates for Energy (CARE), Family Electric Rate Assistance (FERA), and Energy Savings Assistance (ESA) programs to revise their tariffs and forms to include updated household income guidelines and the approved list of categorical programs.<sup>1</sup> PG&E submitted its Advice Letter as a Tier 1, with tariffs and forms to become effective June 1, 2013.

DRA filed its Protest on June 3, 2013 in which it objected that PG&E's residential program guidelines and corresponding application forms for the CARE program ("CARE guidelines and forms") fail to inform customers that they are not required to provide income information during

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<sup>1</sup> CPUC, Energy Division, *Notice to all Investor owned and small multi-jurisdictional owned utilities providing service under California Alternative Rates for Energy (CARE), Family Electric Rate Assistance (FERA), and Energy Savings Assistance (ESA) Programs*, April 1, 2013.

enrollment, but instead, are entitled to enroll in the CARE program solely on the basis of categorical eligibility.

**Mutual Agreement:**


PG&E and DRA acknowledge that numerous issues pertaining to CARE enrollment, including enrollment via income eligibility and/or categorical eligibility, are currently pending resolution at the Commission. PG&E and DRA also acknowledge that the CARE guidelines and forms submitted as part of Advice Letter 3385-G/4224-E have already been printed or posted to PG&E's website, and that it would be prohibitively burdensome, costly, and/or potentially confusing for customers to amend them at this time.

In the interest of resolving DRA's Protest of Advice Letter 3385-G/4224-E, PG&E and DRA have agreed as follows:

- (1) No later than March 15, 2014, PG&E will meet and confer with DRA to discuss the CARE guidelines and forms to be used effective June 1, 2014. PG&E reserves its right to submit CARE guidelines and forms for Commission approval without obtaining DRA's support.
- (2) PG&E agrees that, in both the CARE guidelines and forms to be used effective June 1, 2014, it will make clear that customers may enroll in the CARE program either through income eligibility or through categorical eligibility, unless otherwise directed by the Commission.
- (3) PG&E agrees that, to the extent PG&E seeks income information from CARE applicants, the request for income information will appear in the portion of the CARE application form pertaining to income eligibility and not in the portion of the CARE application form pertaining to general customer information (*i.e.*, customer name and service address) or categorical eligibility, unless otherwise directed by the Commission.
- (4) PG&E agrees that these modifications will apply to both the print and online versions of PG&E's CARE guidelines and forms to be used effective June 1, 2014, unless otherwise directed by the Commission.

In recognition of the foregoing agreement, DRA hereby withdraws its Protest to Advice Letter 3385-G/4224-E.

Sincerely,



Michael Campbell, PM  
Electric Pricing and Customer Programs Branch  
Division of Ratepayer Advocates

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cc: Hazlyn Fortune, Energy Division

Brian K. Cherry, PG&E

Ann H. Kim, PG&E

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Service List for A.11-05-017