



*Pacific Gas and
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August 26, 2014

Mr. Paul Clanon, Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: PG&E's Interaction with Customers and CBOs Participating in CHANGES

Dear Mr. Clanon:

Thank you for your August 21, 2014 letter regarding PG&E's interactions with community based organizations (CBOs) under the Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) program. In compliance with your request, PG&E is changing its process – effective immediately – to allow CHANGES CBOs to negotiate directly on the customer's behalf without the customer being present on the phone if the customer has orally authorized the CBO to do so at the beginning of the phone call. PG&E has notified its staff of these changes and will notify CHANGES CBOs of this modification on or before August 29, 2014.

Our current CHANGES CBO policy requiring written authorization was implemented based on the understanding that the CHANGES program is a utility program subject to the Commission's existing customer privacy rules and recent affiliate audit findings. These findings require written customer authorization of third parties accessing customer-specific information from PG&E ("Final Draft Report, 2010 and 2011 Affiliate Transactions Audit of Pacific Gas and Electric Company Prepared for California Public Utilities Commission," NorthStar Consulting Group, July 21, 2014). However, your letter clarifies that the Commission is the entity that is contractually and legally responsible for the program; and therefore, the Commission is responsible for the privacy rules applicable to the CBOs under the program.

In accordance with your direction regarding the Commission's customer privacy rules under the program, PG&E will implement changes to current call center processes. As was our previous policy, PG&E will permit CBOs who contact us using the required CHANGES 800-number (per the Commission's Directive in D.12-12-011) to directly negotiate by phone on the customer's behalf without the customer present on the phone if the customer has orally authorized the CBO to do so at the beginning of the call.

Lastly, we will partner with the primary CHANGES contractor and the CBOs to update our existing CHANGES contracts to reflect your direction as soon as possible.

We are supportive of the recommendations that you have proposed, and apologize for any confusion. Please feel free to contact me if you have any questions.

Aaron J. Johnson
Senior Director, Customer Programs

cc: Commissioner Catherine J.K. Sandoval
CSID Director Loreen McMahon
Commissioner Chief of Staff Ditas Katague
Commissioner Advisor Amy Baker
CPUC Public Advisor Karen Miller
CHANGES Project Manager Kyle DeVine