California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

FILED
2020 MAY 15 AM 7:59
SAN LUIS OBISPO CO. CLERK-RECORDER
Joselyn Rodriguez

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

Company name/CPUC Utility No.: Richard Heath & Associates, Inc. [RHA] (ID U-946-E)

Utility type:
☐ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Cynthia Bruno Rafferty
Phone #: 559-573-3544
E-mail: cbrafferty@rhainc.com
E-mail Disposition Notice to: cbrafferty@rhainc.com

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)
May 14, 2020

Advice Letter (AL) #: 2-E

Tier Designation: 1

Subject of AL: RHA's Third Party San Joaquin Valley Disadvantaged Communities Electric Pilot Implementation Plan 2.0

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 #: D.20-04-006

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? ☐ Yes ☑ No

If yes, specification of confidential information: N/A
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: N/A

Resolution required? ☐ Yes ☑ No

Requested effective date: 5/14/20 No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: N/A

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Date removed from posting 06/18/2020

Discuss in AL if more space is needed.

Clear Form

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
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Cynthia Bruno Rafferty
Title: Chief Executive Officer
Utility Name: Richard Heath & Associates, Inc. (RHA)
Address: 590 W. Locust Avenue, Suite 103
City: Fresno
State: California Zip: 93650
Telephone (xxx) xxx-xxxx: 559-573-3544
Facsimile (xxx) xxx-xxxx: 559-447-7099
Email: cbrafferty@rhainc.com

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

Clear Form

May 14, 2020

Advice Letter No. 2-E
(Richard Heath and Associates, Inc. [RHA], ID U-946-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Subject: **RHA's Third Party San Joaquin Valley Disadvantaged Communities Electric Pilot Implementation Plan 2.0**

Purpose

Richard Heath & Associates, Inc. (RHA) submits this Tier 1 Advice Letter (AL) 2-E as its Pilot Implementation Plan 2.0, as shown in Attachment A, to comply with Ordering Paragraph (OP) 2 of California Public Utilities Commission (CPUC or Commission) Decision (D.) 20-04-006, "Decision Modifying Decision 18-12-015 In Response to Petition For Modification and to Address Funding Requirements for Bill Protection and Transitional Community Solar Discount Mechanisms," issued on April 23, 2020.

Decision (D.20-04-006) modifies D.18-12-015, "Decision Approving San Joaquin Valley Disadvantaged Communities Pilot Projects," to remove income eligibility requirements for the communities of Allensworth, Alpaugh, Fairmead and Le Grand, and states that all households in these communities may participate fully in the pilots, including having access to fully subsidized appliances. This modification was based on updated projections of the percentage of households in these communities that were likely to be eligible for the California Alternate Rates for Energy (CARE) program, filed by PG&E on February 18, 2020.

Advice Letter 2-E is the result of a singular change to RHA's approved advice letter 1-E-A, removal of the footnote on page 11, that reads: "Per D.18-12-015, pp. 74-75, eligibility in Alpaugh, Fairmead, and Le Grand is limited to households with incomes up to 400 percent of the Federal Poverty Guideline with priority for households with incomes up to 250 percent. These customers may self-certify incomes. All households in Lanare and La Vina are eligible to participate."

At the authorization of Energy Division, RHA requests the Commission exercise its discretion to eliminate the protest period. We request this limitation as the sole change in this Advice Letter, to comply with D.20-04-006, is the removal of a single footnote.

590 W. Locust Ave | Suite 103 | Fresno, CA 93650
559.447.7000
www.rhainc.com

Request

RHA requests the Commission adopt this SJV DAC Electric Pilot Implementation Plan 2.0.

Protests

At the authorization of Energy Division, RHA requests the elimination of the protest period.

If this request is not granted, anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than June 3, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to RHA either via E-mail or U.S. mail at the address shown below on the same date it is mailed or delivered to the Commission:

Cynthia Bruno Rafferty
Chief Executive Officer
Richard Heath & Associates, Inc.
590 W. Locust Avenue, Suite 103
Fresno, California 93650
E-mail: cbrafferty@rhainc.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

RHA requests that this Tier 1 advice letter become effective on the date submitted, May 14, 2020.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically via Email to parties on the service list for R.15-03-010.

/S/
Cynthia Bruno Rafferty
Chief Executive Officer

Attachments

cc: Service List R.15-03-010

Attachment A

RHA's Third Party San Joaquin Valley Disadvantaged Communities Electric Pilot Implementation Plan 2.0

RHA's Third Party San Joaquin Valley Disadvantaged Communities Electric Pilot Implementation Plan 2.0

Table of Contents

Third-Party SJV DAC Electric Pilot Overview

Introduction

This Implementation Plan Advice Letter describes how Richard Heath & Associates, Inc. (RHA) has designed and plans to execute the electrification pilots in Lanare, Alpaugh, Fairmead, La Vina and Le Grand[1] that were approved in the California Public Utilities Commission's (CPUC or Commission) Decision (D.) 18-12-015 (the Decision). RHA is filing this Implementation Plan Advice Letter pursuant to the decision.

As stated in D.18-12-015, the Commission's intent approving the pilot is to find affordable energy alternatives to propane and wood burning for disadvantaged communities in the San Joaquin Valley Disadvantaged Communities (SJV DAC). The Commission's stated goals and objectives for these pilots follow:[2]

- "The dual goal[s] of the pilots are to provide cleaner, more affordable energy options to propane and wood burning and gather real time data needed to assess the economic feasibility of extending affordable energy options to all listed SJV DACs"; and
- "The pilot objectives are as follows:
  - Gather inputs to assess cost-effectiveness and feasibility during Phase III;
  - Provide access to affordable energy options in participating pilot host communities;
  - Reduce household energy costs for participating pilot host customers;
  - Increase health, safety and air quality of participating host pilot communities;
  - Test approaches to efficiently implement interventions;
  - Assess potential scalability."

Although this implementation plan represents RHA's best information and current plans, it is subject to change. Potential changes to this Implementation plan may occur based upon the number of homes requiring additional power before performing electrification, customer receptiveness to participation and the implementation of bill protection credits.

Finally, changes may also arise from Commission and stakeholder feedback, feedback from pilot participants and improved information about their households, a re-scoping triggered by an anticipated budget shortfall[3], among other causes.

Pilot Communities

The following figure shows the location of the five third-party SJV DAC pilot communities.

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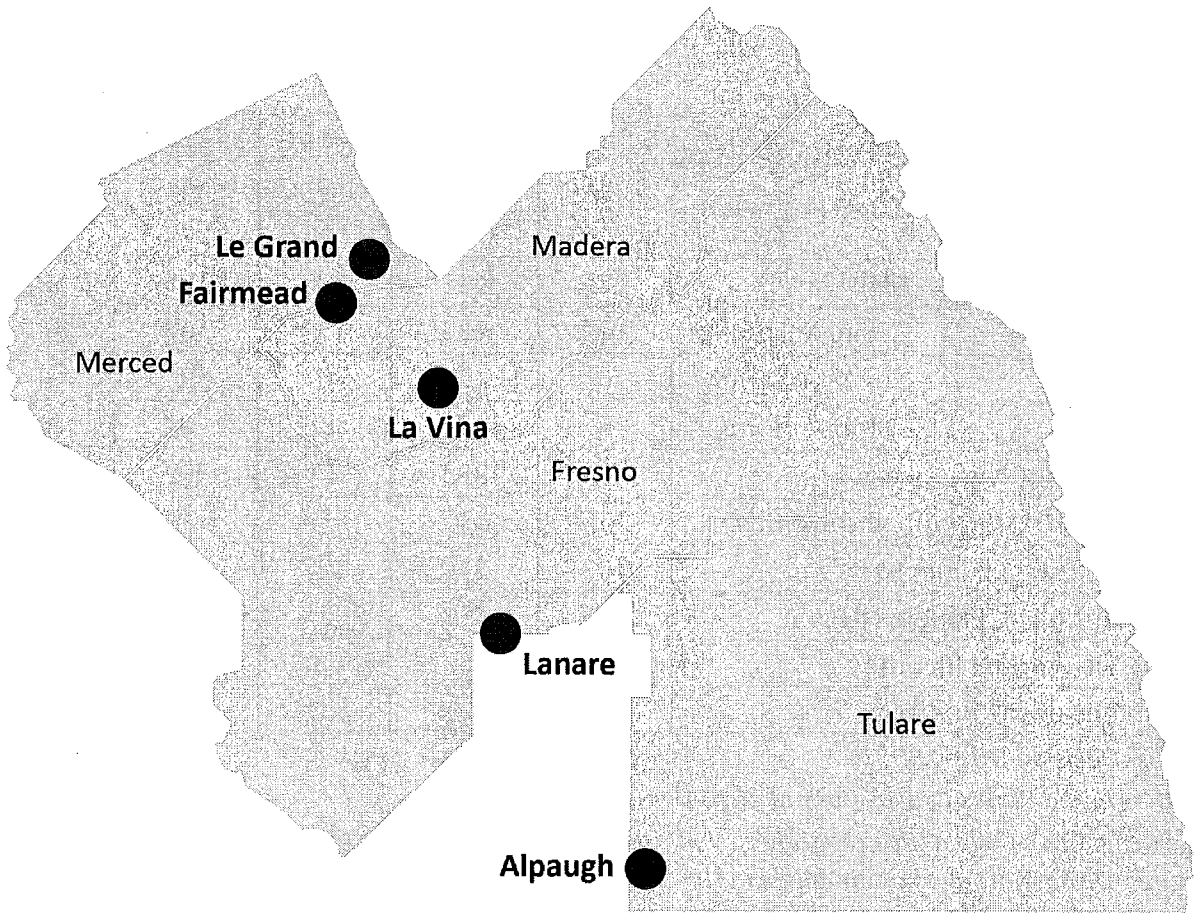
[1] Referred to throughout as third-party electric pilot communities or pilot communities.

[2] D.18-012-015, p. 10 (Note that page references are consistent with the version of D.18-12-015 served on December 19, 2019. A previous version has slightly different pagination). Referred to throughout as the decision or SJV DAC Pilots Decision.

[3] SJV DAC Pilots Decision, p. 136.

FIGURE 1
PILOT COMMUNITIES



The table below provides demographic and household information for the third-party electrification pilot communities.

TABLE 1
3P PILOT COMMUNITY DATA

Community Data	Alpaugh	Fairmead	Lanare	La Vina	Le Grand
County	Tulare	Madera	Fresno	Madera	Merced
Population*	1,026	1,447	589	279	1,659
Est. No. of Households (HH)^	225	401	150	165	502
Single Family#	219	396	138	165	446
Multifamily#	0	0	0	0	36
Mobile Homes#	6	5	12	0	0
Est. HH Without Natural Gas^	46	253	17	84	502
Est. Percent HH Without Natural Gas^	20%	63%	11%	51%	100%
Est. No. of CARE Eligible HH^	193	340	127	140	431
Est. Percent CARE Eligible HH^	86%	85%	85%	85%	86%
Average HH Annual Income^	$38,750	$31,773	$26,023	$23,000	$41,776
Est. Percent of HH Renting^	47%	43%	38%	38%	31%

^ From the Decision D.18-012-015

**From the United States Census Bureau 2010 Demographic Profile*

#From Pacific Gas and Electric Company's (U 39 G) Amended Updated Proposals for Pilot Projects in Designated Disadvantages Communities in the San Joaquin Valley

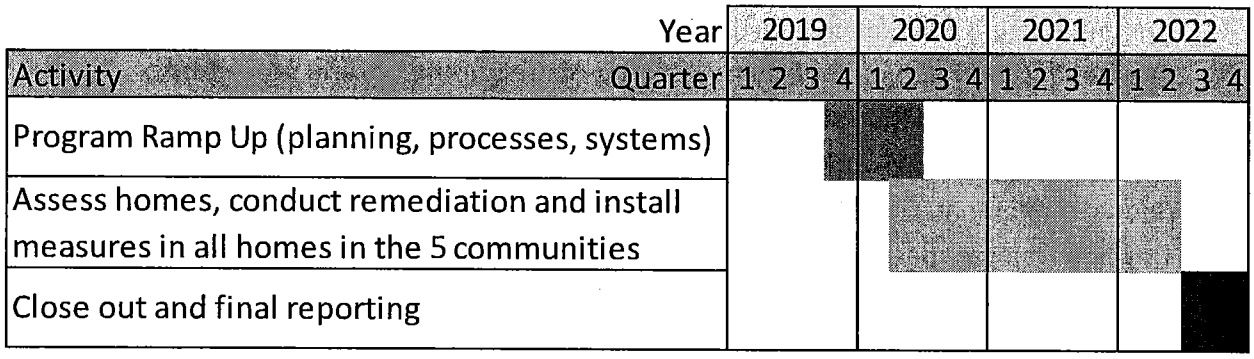
Major Tasks and Timeline

The primary activities of the pilot include:

- Replacement of wood and propane appliances with efficient electric appliances, specifically space conditioning appliances/systems, water heaters, cooking ranges and clothes dryers;
- Leveraging of existing programs, especially community solar programs, low-income discount programs and energy efficiency (EE) programs to support the efficient operation of pilot households and reduce energy cost;
- Gathering pilot community members and participants' data on energy cost, program enrollment
- and barriers, and other information; and
- Support efforts of the Community Energy Navigator (CEN) program to build a network of local, knowledgeable and trusted energy experts to support the above pilot activities, as needed.

The figure below provides a high-level timeline for the major activities under the third-party pilot:

FIGURE 2
THIRD PARTY ELECTRIC PILOT TIMELINE



In the revised timeline, RHA gave considerable thought to how best to streamline efforts. We have created maximum flexibility for both the CENs and interested customers by planning to work wherever the work is. This will allow RHA to respond to the realities the CENs encounter as they establish the customer pipeline, rather than placing unnecessary geographic limitations. As a result, we have not differentiated timelines by community. Instead RHA will work in all communities as we receive completed customer applications.

We note that our ability to achieve this timeline will depend on several factors, most notably quickly receiving CPUC authorization to proceed, the removal of shelter in place notices resulting from COVID-19, the CENs ability to establish and maintain a stable pipeline of completed customer applications and "in-front-of-the-meter" electric infrastructure adequate to support electrification.

Program Management

A breakdown of major responsibilities of the pilot team members is provided below consistent with the Decision;[4] RHA notes that this is subject to change:

Pilot Administrator (PA)

- Develop Pilot Forms and Procedures for:
  - Documentation of existing conditions;
  - Developing customer-specific scopes of work;
  - Procuring materials and appliances;
  - Quality control;
  - Safety;
  - Developing survey forms and collecting, storing and transmitting Data in conjunction

[4] D.18-12-015, p. 54 for Program Administrator; pp. 82-85 for CPM.

with the Data Gathering Consultant, CEN, Community-based Organizations (CBO) and Implementer(s);
    - Supporting outreach by the CEN and CBOs; and
    - Develop Specifications for work and materials in partnership with CPM and Implementer;
- General Program Management:
    - Communicating with and supporting Energy Division;
    - Overseeing contractor compliance with program requirements and procedures;
    - Develop implementation strategy/phasing/approach with CPM and Implementer;
    - Scope and coordinate work of Implementer;
    - Source Implementation Partner(s), if applicable;
    - Develop training specifications for Implementer in coordination with other Administrators;
    - Develop and track overall project timeline;
    - Oversee development of customer-specific scopes of work;
    - Inspect and control quality for all installations;
    - Identify vendor safety requirements;
    - Resolve issues, including escalated customer concerns;
    - Track overall budget and monitor budget issues, including progress and trends relative to budget caps; and
    - Process Invoices;
- Data Collection and Reporting:
    - Collect data from CPM and Implementer, including program operations, eligibility and enrollment information, job statuses, contractor compliance, invoices paid, metrics on training and local labor;
    - In coordination with other administrators, consultants and contractors, develop instruments, survey forms and protocols for collecting, storing and transmitting data beyond what is specified in Data Gathering track (e.g., local hiring data, and community-specific evaluation metrics); and
    - Provide quarterly and annual reports to the Commission and stakeholders;
- If required, conduct limited outreach outside of CPM responsibilities (e.g., community engagement prior to CPM engagement and outreach to local officials and government representatives in respective pilot counties); and
- Provide requirements for bulk purchases of appliances and ensure warranties on all improvements and installed appliances.

Pilot Implementer (PI)

- Train staff and contractors; ensure appropriate certifications;
- Identify, source and coordinate necessary sub-contractors;
- Source appliances and other materials per specifications and bulk purchasing requirements;
- Conduct in-home assessments;

- Develop customer-specific scopes of work and energy cost savings estimates;
- Manage the permitting and installation of appliances and other associated measures or remediations, and removal of replaced appliances for proper recycling and/or disposal;
- Provide contact information for and provide servicing and maintenance of installed technologies during and after the pilot;[5]
- Manage any corrections to work done and warranty issues; and
- Adhere to Master Safety Plan.

CEN Program Manager (CPM)

- Develop a community engagement plan:
  - Identify engagement techniques, barriers and mitigations; staffing structure; cadence of engagements; partnerships, workforce engagement and coordination with Workforce Education and Training (WE&T) plans;
  - Including education on the importance of retaining propane and/or wood consumption, cost information, and existing program qualifications for enrollment;
  - Tactics for following up with customers who may be ineligible or decline for any reason that may change over the course of the pilot program;
- Support development of eligibility, surveys and other pilot forms and procedures;
- Conduct or facilitate pre-pilot surveys and interviews;
- Work with Administrator to ensure consideration of community concerns, input and outcomes;
- Conduct community education and outreach at each stage of the pilot;
- Identify and facilitate access to additional local, state, federal and private sources for additional grants and loans, especially for remediation needs;
- Identify, train and maintain a network of CEN's and CBO's to:
  - Engage pilot community members in pilot by organizing and leading in-community meetings and home visits and assisting with completion of the application process;
  - Collect and facilitate access to program resources such as relevant agencies and programs;
  - Assist and/or enroll customers in existing programs, especially available discount programs and selection of most appropriate rate:
    - Gather information about pilot community households, including propane consumption, cost data and existing appliances; and
    - Assist customers whose households requiring significant remediation and support them in identifying resources to be eligible to participate;
  - Support customers' adjustment to new appliances;
- Report to Administrator on CEN activities and metrics, including Monthly reports on remediation funding for quarterly substandard housing report leveraged outside of the pilot

[5] SJV DAC Pilots Decision, p. 164.

budget; and

- Assist pilot participants in understanding and adhering to owner-tenant agreement and monitor tenant protection issues.

Budget and Reporting

The Commission approved a maximum budget of $25,754,613 for pilot projects in Alpaugh, Lanare, Fairmead, La Vina and Le Grand.[6] Table 2 shows third-party pilot costs by component. Table 3 shows anticipated spend in each pilot community.

TABLE 2
THIRD-PARTY SJV DAC PILOT BUDGET

Pilot Component	Total Cost
Administration	$ 1,394,242.00
Electrification Estimates	$ 16,554,539.00
Other Costs - Remediation/Repairs	$ 2,186,293.00
Total Estimated Cost	$ 20,135,074.00
Average per home	**$ 22,372.30**

TABLE 3
THIRD-PARTY SJV DAC PILOT BUDGET BY COMMUNITY

Item	Budget
General Admin	$ 1,369,146.00
General WE&T	$ 25,096.00
Alpaugh Home Upgrades	$ 844,245.00
Alpaugh Remediation	$ 111,497.00
Fairmead Home Upgrades	$ 4,643,346.00
Fairmead Remediation	$ 613,228.00
Lanare Home Upgrades	$ 312,004.00
Lanare Remediation	$ 41,206.00
La Vina Home Upgrades	$ 1,541,664.00
La Vina Remediation	$ 203,602.00
Le Grand Home Upgrades	$ 9,213,280.00
Le Grand Remediation	$ 1,216,760.00
Total	**$ 20,135,074.00**

[6] D.18-012-015, Order Correcting Error, p. 3.

As noted earlier, the decision directs PAs to make every effort to control costs and to treat the forecast number of homes with the approved budgets. However, in the event that average costs trend significantly higher than forecast, the decision directs administrators to reduce the scope of work with guidance from the Commission staff.[7] As described in the section on reporting, RHA will provide quarterly forecasts and reports on budget and average costs per household to ensure such re-scoping can occur in a way that avoids a sudden halt to work in any home or community as envisioned by the Commission.

Customer Journey

Serving disadvantaged communities and providing a positive customer experience is fundamental to this pilot. Customers will interact with multiple Pilot stakeholders, as well as additional external stakeholders, such as solar program implementers. With multiple contacts and touchpoints, customers could become confused, find it difficult to navigate service offerings, and ultimately end up dissatisfied. As such, RHA has developed a customer journey, and established customer hand-off mechanisms and points of communication, to ensure pilot customers have a very positive and satisfying experience. RHA also will work in close collaboration with other pilot stakeholders to support a seamless customer journey.

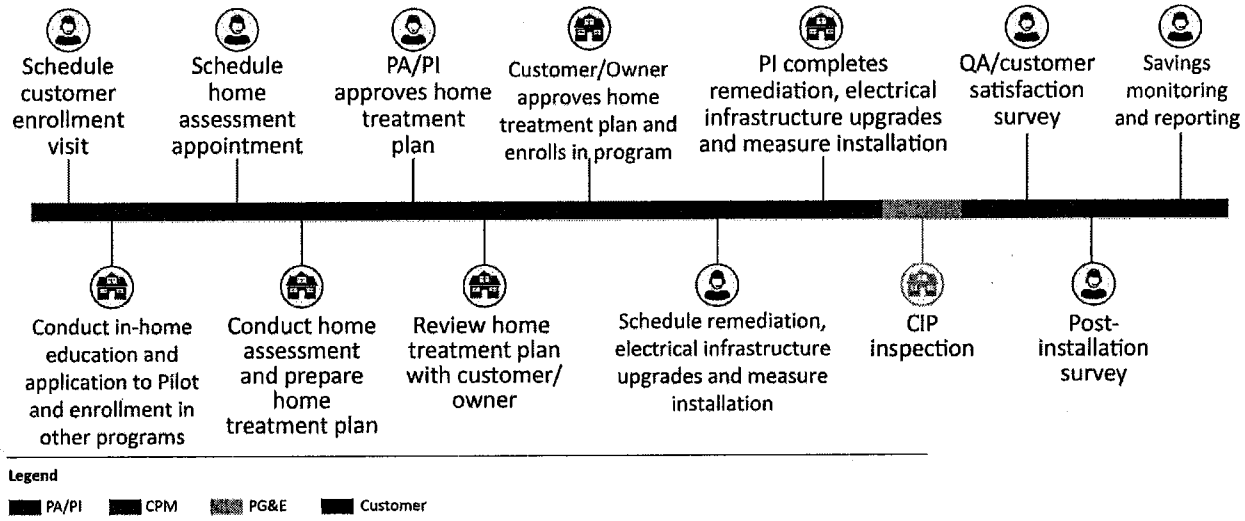
The customer journey can be divided into seven phases:

1. Customer Outreach
2. Customer Acquisition
3. Pilot Enrollment
4. Home Assessment
5. Home Treatment Plan
6. Installation
7. Quality Assurance

RHA provides the proposed high-level customer journey, shown in Figure 3 and Appendix A, as an overview of the program from the customer's perspective from Customer Acquisition to Quality Assurance.

[7] SJV DAC Pilots Decision, p. 136.

FIGURE 3
CUSTOMER JOURNEY



Customer Outreach

The CEN will conduct a kick-off for the pilot communities, to offer information about the pilot and provide contact information. The CEN will also use targeted outreach, community outreach and community meetings to encourage participation. Once a customer has contacted the CEN, a navigator will speak with the customer to:

- Provide additional details about the pilot, existing programs, and application and enrollment processes;
- Inquire about the customer's level of interest and availability;
- Request that the customer begins retaining propane and wood usage information (if available);
- Gather information on current household appliances and any planned upcoming renovations;
- Determine eligibility;
- Help the customer apply for the pilot and enroll the customer into other programs, as applicable.

In the course of the Pilot Implementer conducting outreach for the ESA program, all potential ESA customers will be pre-screened for the pilot program and the information sent to the CEN/CPM to contact the customer for final eligibility determination and application.

Communication

For outreach and acquisition strategies, RHA will rely on the CPM to initiate standard and non-standard communication with customers. As part of the support provided to the customer, CENs will document on the program application any disabilities and the preferred language spoken by the customer so that RHA can manage language expectations successfully. When necessary, especially

to address unique communication needs, RHA will include the assigned CEN throughout the customer journey to overcome language, cultural and other barriers.

Although RHA will rely on pilot materials created by the CPM to comply with accessibility standards, in the limited instance RHA provides written materials to pilot customers, we will do so in-language, and in large print, electronic format or audio, when necessary. RHA and the Pilot Implementer will not organize community events or produce video material as this is the function of the CPM/CENs. RHA will not provide pilot information online, but instead will rely on the CPM for all outreach and marketing functions.

Interactions with customers, at all stages of the customer journey, will be conducted in appropriate formats and in a culturally competent manner. Both RHA and the Pilot Implementer have served successfully low-income communities in the San Joaquin Valley for decades, by successfully overcoming communication barriers.

The RHA team includes staff members from diverse backgrounds who speak the languages identified below. In addition, RHA maintains access to the AT&T Language Line for translation and interpretation services in more than 240 languages that are not immediately available through staff. RHA has utilized this approach effectively to serve hundreds of thousands of Energy Savings Assistance (ESA) Program customers in the San Joaquin Valley, including those in the 5 pilot communities.

In 2019 alone, the RHA team served successfully over 36,000 such customers. Languages spoken internally include:

- Spanish
- Hmong
- Cantonese
- Mandarin
- Tagalog
- Arabic
- Farsi
- French
- Russian
- Navajo
- Portuguese
- Czech
- Norwegian
- Vietnamese
- Hindi
- Tongan

Pilot Application

Information received during customer outreach activities will be utilized by the CEN/CPM for program application, to include:

- Provide detailed information about participation in the pilot including what to expect through the assessment and installation process;
- Assess pilot eligibility using the Energy Savings Assistance (ESA) self-certification approach, as applicable;
- Educate the customer on existing programs such as ESA, California Alternative Rates for Energy (CARE), Family Electric Rate Assistance (FERA), etc.;
- Assess existing program(s) enrollment eligibility;

- Facilitate customers' enrollment in existing programs per existing program enrollment processes where applicable;
- Gather additional household information in support of the assessment and installation plans;
- Inform the customer regarding next steps, including any follow-up communication to confirm existing program enrollment (ESA, CARE, FERA, etc.) and to schedule the initial in-person household assessment; and
- Confirm the customer's understanding and readiness to participate in the pilot.

Home Assessment

Pilot customers will be contacted to schedule a comprehensive in-home assessment. During the call, the scheduler will validate information collected by the CEN/CPM and obtain permission to text and/or call the customer for appointment confirmations and reminders.

The scheduler will also validate ESA pre-screening information and, if applicable, communicate the documentation required to complete enrollment in those programs, reinforcing the importance of having documentation available at the time of their home assessment.

The assessment will include a walkthrough of the household and include the CEN where needed or applicable. Due to the complex nature of the comprehensive home assessment, this work will be done by journeyman-level Installation Specialists. Installation Specialists will be skilled at determining the feasibility for electrification measure installation, identifying and specifying electrical infrastructure upgrades, identifying required remediation work and detailing work necessary for all feasible electrification measures. Installation Specialists will also be qualified to assess for ESA program enrollment.

The Installation Specialist will start the appointment by introducing themselves, providing a high-level overview of what will occur during the appointment, and answering general questions about the program. The Installation Specialist will conduct the comprehensive home assessment, determining the feasibility of pilot-specific measures, ESA measures and other leveraged program measures, if applicable.

As part of the assessment, the Installation Specialist will assess whether the existing electrical infrastructure can handle the load from electrification measures and the physical structure can support feasible measures. This includes evaluation of the following:

- Main Distribution Panel (MDP) condition and capacity
- Subpanel condition and capacity
- Existing branch circuits
- New branch circuits
- Structural Assessment (condition of existing roof, plumbing, remediation needed, etc.)

The Installation Specialist will document all findings, including remediation work necessary to make measure installation feasible.

Finally, consistent with the decision, households with income levels consistent with California Alternate Rates for Energy (CARE) eligibility requirements will be prioritized in staging assessment and installation steps.[8]

Home Treatment Plan

Informed by the comprehensive home assessment, the implementer will develop a home treatment plan to include:

- Recommended measures from all applicable programs
- Remediation plans to address conditions that make any recommended measures non-feasible, including costs
- Electrical infrastructure upgrades
- Energy cost savings estimate

If the home treatment plan includes a remediation plan, the plan will include scope, timeline and cost per measure needing remediation work. Remediation spending will be capped at $5,000 per home, exclusive of electrical infrastructure upgrades. The plan will be sent to RHA for approval prior to presenting to the customer/owner.

The Installation Specialist will review preliminary findings with the customer/owner, including likely measures to be installed, remediation issues, electrical infrastructure upgrades and next steps. Approval of the home treatment plan and consent to move forward, from both the customer and landlord, where applicable, will be required to proceed, and will constitute enrollment into the program. If expected costs of required remediation exceeds the $5,000 program maximum, the customer will be referred back to the CEN to secure the additional funding, only proceeding to the installation step once required funding is obtained.

Installation

After obtaining customer approvals, the PI will obtain building permits and schedule installation appointments with the customer. To minimize customer interruption, the PI will make every effort to schedule multiple activities to occur during each appointment. Remediation, electrical infrastructure work and installation of Pilot or ESA measures will occur simultaneously, where safe and feasible. This will reduce the instances of the customer missing work or other obligations to be at home and may also decrease the time to complete the installations overall.

Installation Specialists are familiar with applicable installation standards and leveraged IOU demand-side program policies and procedures. Installation of all measures will occur in compliance

[8] SJV DAC Pilots Decision, OP 14.

with applicable standards and regulations. Installation Specialists will also follow safety procedures as outlined later in our proposal.

Should RHA become aware of installation quality issues through feedback from the third-party inspector, or through QA checks, we will take immediate action to correct the issue for the customer and to improve the PI or Installation Specialist's performance.

During installation, the PI will provide customers education on the operation of new measures and supply warranties and manuals. Minimum warranty requirement for ESA program measures and appliances are shown in Appendix C. The PI will answer all customer questions thoroughly and provide contact information for subsequent questions or issues. Once work is completed, the PI will close out all permits.

Quality Assurance

RHA will be responsible for the intake and processing of customer inquiries and escalations not handled directly by the CEN. Introductory communications sent to customers will include a phone number and e-mail address enabling the customer to contact RHA directly. Those inquiries will go to a voicemail or inbox monitored by a dedicated RHA representative.

RHA will perform file checks on documentation and program data from the PI. RHA will review internal and PI administrative operations, including invoice submissions, forms, completion of work flow steps, measure disputes, accuracy of forms and documentation and timely submission.

RHA will work with the CPM to benefit from customer satisfaction information supplied in the post-pilot survey. As needed, RHA will supplement CPM survey efforts by collecting customer feedback through the following:

- In-field QA
- Inbound customer complaints
- Telephone QA calls to ESA customers (leveraged activity)

RHA will monitor PI field performance through:

- Post-QA spot checks on a percentage of homes not inspected by CIP to validate that feasible measures were installed are functioning and ensure compliance with program standards
- Targeted field assistance based on data (identified trends) to focus strategically on individuals requiring extra support

Through these quality assurance activities, RHA will validate that the PI delivers high quality services accurately and timely, and that the customer is satisfied. Based on our findings, we will improve work processes and increase efficiencies.

Marketing, Education and Outreach

Approach

RHA will work collaboratively with, and provide support to, the CPM and their CEN network in each of the third-party communities.

ESA Opportunities

Although the CEN will drive marketing and outreach, there may be cases where a potential pilot customer is identified through outreach conducted by the PI for the ESA Program. In that situation, the PI will provide the customer with basic information on the program, provide any collateral material developed and approved by the CEN, and provide the customer's information to the CEN for pilot eligibility determination and enrollment.

Vendor Sourcing

RHA has sourced 2 vendors directly for this pilot work

1. Pilot Implementation Partner (Implementer or PI)
2. Bulk Appliance Partner

RHA will also work collaboratively with identified implementers of other programs, such as CSI Thermal, WatterSaver, DAC-SASH and SGIP, to ensure that customers are served with all programs for which they qualify and are interested. This collaboration will include obtaining pre-qualifying information at the home assessment, a warm transfer of information to the implementer, and coordination of installation appointments, when feasible.

Pilot Implementation Partner

The major responsibilities of the Implementer are to conduct a comprehensive in-home assessment to identify all feasible measures and required remediation, develop a customer-specific home treatment plan, manage the permitting process, conduct remediation work, install appliances and other associated measures, and resolve corrections to work done or address warranty concerns. RHA has selected an Implementer who is also an ESA Contractor to ensure that leveraging the ESA Program with the pilot will occur to the fullest extent and appear seamlessly to the customer.

Bulk Appliance Partner

RHA has selected a Bulk Appliance Partner to provide appliances for the pilot program at existing ESA Program pricing, for ESA measures, and competitive pricing for new measures. The Bulk Appliance Partner will deliver and install appliances and remove old appliances for recycling.

Workforce Education and Training

Workforce Education

Workforce education will occur primary through the PI. The PI currently recruits qualified staff by engaging with local and regional workforce investment boards and CBOs to identify experienced

workers with expertise in electricity and energy efficiency work. They will also partner with local technical/trade schools, attend trade school job fairs, advertise on online employment websites and utilize other means to recruit qualified staff for this pilot. Finally, the PI will leverage veteran organizations in the hope of recruiting veterans into the program. When feasible the PI will leverage existing staff working on ESA and other related programs.

The PI intends specifically to post open positions in each pilot community in order to source local, qualified candidates. The job postings and interviews will occur no less than 3-6 months in advance of anticipated installations occurring in the individual pilot communities, to allow time for recruitment, onboarding and training.

At the conclusion of the pilot, the PI will:

- Support its pilot workforce with continued employment by shifting to other programs, when available, or through job placement services including job interview skills and resume writing support;
- Support its pilot workforce in seeking other energy-related work after the Pilot should they choose

Training

RHA will ensure their staff and PI staff working on the Pilot receive onboarding training on operations, data gathering requirements and other areas, as needed, to ensure alignment with pilot goals and objectives and ensure a positive customer experience. This training will occur either in-person or via webinar.

As work is performed in the pilot communities, RHA will conduct post-quality assurance (QA) inspections on a sample of customers not reached by PG&E's Central Inspection Program (CIP). If issues are identified at the post-QA inspections, we will provide supplemental training and technical assistance to the PI to address deficiencies identified.

Throughout the Pilot, RHA will use data to verify contract compliance and pass rates, and to identify performance and safety issues. RHA will rely on QA data to inform operational changes, policy and procedure changes, program improvements and to identify needs for refresher or enhanced training.

The PI will conduct technical training for existing and new staff to ensure that they possess the skills and abilities to successfully perform pilot work. Specific topics will include program measure eligibility criteria and feasibility requirements, identifying, documenting and resolving remediation issues, and measure installation. In addition, the PI's pilot staff will receive Combustion Appliance Safety (CAS) Training. Recommended licenses and/or registration for installing pilot measures is shown in Appendix B.

Repair and Maintenance Network Staff

Upon completion of the warranty phase of the pilot, customers served will require accessible, trained staff to address requests for repair and maintenance. One-off repair and maintenance requests from hard-to-reach areas may not be served by contractors from the larger cities within the San Joaquin Valley (e.g., Modesto, Merced, Fresno, Tulare, Bakersfield), nor from more distant locations such as the Bay Area or Southern California due to travel costs. RHA intends to address this potential service gap by engaging with local contractors, manufacturers and suppliers to cultivate a local workforce of qualified, trained repair and maintenance technicians in and near the pilot communities.

Risk Management

As part of a comprehensive risk management process, RHA will identify a comprehensive set of risks to project success, to customers, stakeholders and contractors. It will conduct a ranking exercise and develop controls and mitigations with an emphasis on high-ranking risks. The risk matrix will be developed collaboratively with stakeholders and updated as needed through the implementation process.

The following three key risk areas are described below, and mitigations proposed - participant willingness, remediation of substandard homes, and ensuring contractor and participant safety. Depending on the final approved approaches addressing these risks, additions or changes to the proposed activities in this implementation plan may be appropriate.

Participant Willingness

RHA has identified a major risk as participant willingness to go "all electric" and adopt the technology offered by the program. Customer perceptions surrounding grid reliability, the expense of electricity and limitations of electric cooktops may impact customer willingness to participate. Messaging to allay these concerns will prove critical to alleviating customer fears.

RHA will support efforts to mitigate these concerns by:

- Engaging in the Bill Protection proceeding to aid in creation of a methodology that proves feasible and sustainable
- Providing support to the CPM in the delivery of messages reinforcing program information and education

Remediation of Substandard Homes

The Decision requires an approach to substandard housing in this implementation plan, including a description of home assessments and safety/siting plans, prioritization and identification of specific conditions that might preclude extensive in-home work.[9]

[9] SJV DAC Pilots Decision, p. 95.

A healthy home is a structure that is free from the following substandard housing conditions:

1. Moisture and mold that can cause or worsen illness or damage personal belongings;
2. Pests that can cause illness or are a nuisance;
3. Unsafe conditions and poorly maintained plumbing, heating and other systems that can lead to injuries and other problems;
4. Unventilated areas that can increase indoor pollutant levels.[10]

Often residents in disadvantaged communities are not able to afford the upkeep that over time contributes to substandard housing. Although the responsibility of owners/landlords to fix substandard housing conditions in rental properties, not all owners/landlord are engaged or responsive to renters. Pilot customer homes may not be up to code, may have been built with hazardous materials or may suffer from other disrepair leading to increased inefficiency and barriers to being served by the Pilot and leveraged programs.

A highly experienced PI foreman will conduct a comprehensive home assessment to determine the feasibility of electrification measure installation, identify and specify electrical infrastructure upgrades, and identify feasible measure for all applicable programs. The home assessment will also document all conditions and remediation work needed to make safe and feasible the installation of all measures, including estimated costs.

The PI will create a Home Treatment Plan that outlines feasible pilot and leveraged program measures, as well as required remediation and estimated costs. Required remediation will be categorized, and prioritized, as:

1. Remediation required for ESA measures that can leverage minor home repair funds to:
   a. Mitigate hazardous conditions (e.g., Combustion Appliance Safety [CAS] Testing)
   b. Mitigate major infiltration sources (e.g., broken windows)
   c. Permit the installation of a measure
2. Remediation that can be completed within the $5,000 pilot program maximum
3. Remediation that requires additional funding over the $5,000 pilot program maximum

However, the prioritization of remediation may not reflect the order in which they are completed.

Additionally, if there are propane appliances that cannot feasibly be replaced with electric, the PI foreman will evaluate existing appliances for combustion safety, including the presence of leaks and determine adequate combustion ventilation air (CVA). If unacceptable levels of carbon monoxide are identified, or inadequate CVA is present, all work will stop, and the condition will be remediated prior to infiltration measure installation. If the combustion ventilation air is inadequate and irreparable, the job will be classified as non-infiltration measures only and the Installation Specialist will record this as such in the assessment findings.

[10] https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHIB/CPE/Pages/HealthyHomes.aspx

Once approved by RHA, the Home Treatment Plan will be reviewed with the customer, or owner if a rental property. If the customer/owner approves to move forward with the home treatment plan, specific remediation requirements and costs, if greater than the $5,000 program maximum, will be submitted to the CEN to research and procure additional funding for the customer. If additional funding is not secured for required remediation, the CEN will work with the customer to ensure they understand the issues which prevent them from receiving those measures. The CEN will provide customers with other potential options for remediation (e.g., via other assistance programs) and customers may be reconsidered to receive pilot measures if repairs can be made while the pilot is still active. Ultimately, RHA will ensure the customer is served with all feasible measures from leveraged programs and within the remediation maximum. Final remediation work and costs will be tracked and reported.

Prior to beginning the comprehensive home assessment Installation Specialists will complete a Site Safety Assessment form to document any conditions outside or inside the home that would pose a safety hazard or threat. The customer will be made aware of issues identified and that moving forward with the program is dependent on resolution of the issue(s) identified.

Safety

Protecting the health and safety of our workforce, contractors, customers and clients, is critically important to RHA. Safety is ingrained in our business practices and daily guides our operations. As such, RHA is committed to protect and improve the personal safety and health of RHA and contractor employees by establishing a comprehensive and effective Master Safety Plan[11] for this pilot. This document addresses safety practice applicable to both in-house and on-site activities intended to ensure safe work practices and customer safety.

Contractors working on the Pilot program must follow all applicable laws and regulations pertaining to employee safety. In addition, employees shall take all reasonable precautions against performing work on homes that will subject employees or customers to health or safety risks.

Contractors that perform electrification and weatherization work must be aware and knowledgeable of the interaction between these activities and how home systems function interactively. The health and safety of customers and the integrity of building structures must not be compromised by electrification activities or the installation of weatherization measures. All activities shall be conducted in conformance with applicable regulations - in a manner that is safe for employees, occupants and others (e.g. visitors, neighbors, pets, etc.).

In addition to the Master Safety Plan, RHA will require employees and contractors to comply with:

- Cal/OSHA Safety and Health Standards, CCR Title 8
- The California Installation Standards Manual (CISM), which is based on the widely adopted

[11] RHA's 3P SJV DAC Pilot Master Safety Plan. Available upon request.

model building codes (UBC, UMC, NEC, etc.) and federally recognized standardizing and testing agencies (UL, ASTM, ANSI, NFPA, etc.). Also known as the ESA Weatherization Installation Standards (WIS) Manual

- The California Health and Safety Code

RHA and contractors working on the pilot will be required to have comprehensive safety training the following areas, as detailed in the Master Safety Plan:

- General Safety Practices in the Workplace
- Fire Protection and Prevention
- Personal Protective Equipment
- Record Keeping and Reporting

Additionally, the PI must ensure that staff working in homes are trained in:

- Identifying Potential Hazards (e.g. assessment and notification)
- Hazardous Conditions (e.g. structural, electrical, moisture, etc.)
- Hazardous Materials (e.g. lead, asbestos, propane, etc.)
- Combustion Appliance Safety (CAS) Testing

It is the responsibility of every RHA and contractor employee to utilize safe working practices. The Master Safety Plan will serve as a guide and is not intended to be the only set of rules. RHA recognizes the laws, regulations, codes and standards that govern the activities of RHA and contractor employees.

Although primary responsibility for training installation staff rests with the PI, it is ultimately the responsibility of the PA to ensure all employees receive proper training and instruction on how to work in a safe and healthy environment. To that end, RHA will assist our contractor partners with tailgate meetings, ride-alongs and other field activities designed to assure quality, as required.

In the course of field activities, RHA personnel will report violations of any law, regulation, code or standard. The report will be forwarded to the contractor in violation and will be inserted into the permanent file of the contractor. It will be the responsibility of the contractor to make the necessary adjustments to bring them into compliance.

Evaluation Plan

This section presents RHA's proposed research plan for the impact evaluation of the pilots. The IOUs have also been directed by the Commission to conduct a joint pilot process evaluation to examine the design and delivery of the pilots. These pilot evaluations will be used along with the information gathered in the Data Gathering Track to inform the economic feasibility and community impact of extending affordable energy options to all SJV DACs.

Pilot evaluation will be complex with data being gathered by multiple parties: Track B Data Gathering Consultant, PAs, CEN/CPM, Pilot Implementers, leveraged program Implementers and Administrators, and Evaluation Consultant(s). RHA will collaborate with the other PA's and collect data in alignment with program data gathering requests and overall Commission objectives. Please reference Appendix F[12], for an initial list of the data elements to be collected in support of the pilot research questions.

Impact Evaluation Plan

While the final research objectives are still under consideration, we agree with PG&E on the basic research objectives for conducting the impact evaluation:

1. Establish pre- and post-pilot conditions associated with customers in the pilot communities who did not have access to natural gas and relied on wood, propane, diesel, or other fuels (including those on all-electric rates) for residential energy use.
2. Determine weather-adjusted energy and bill impacts of the treatment, and identify any residual
3. propane/wood usage and bills.
4. Report total number and combinations of measure installations. Assess bill savings and satisfaction for various combinations of measure installations.
5. Better understand other factors that may have driven or influenced the changes in energy usage and the decision to adopt electrification.

Proposed Pilot Evaluation Methodology

Detailed data collection will be required to evaluate the outcomes of the pilot. These data elements will be collected by partnering with other stakeholders, leveraged programs and the PI to collect household information at the time of the behind-the-meter (BTM) appliance conversion or home system upgrade work, as well as with the CENs to collect pre- and post-pilot data. A list of the data elements to be collected is provided in Appendix F[13]. Overall, RHA plans to collect the following information either through the program implementer, utility or third-party data, or a CEN:

- **Number of Households Impacted**: RHA plans to report four sets of household counts, including:
  - The number of households in community;
  - The subset of this population that was deemed eligible candidates for BTM appliance replacements in scope for each community;
  - The subset of this population that was deemed to have homes that could not be treated broken down by cause, including excessive cost of BTM upgrades, or customer or landlord refusal, as applicable; and
  - The subset of this population that is ultimately impacted.

[12] PG&E's San Joaquin Valley Disadvantaged Communities Pilot Implementation Plan, Advice 5498-E, submitted 3/19/2019.
[13] Ibid.

- **Measures Undertaken:** RHA will report the aggregate measures undertaken in the pilot. This data collection will also inform an understanding of customer preferences for appliances.
- **Energy Usage and Household Characteristics:** RHA will support the collection of data regarding baseline and post-pilot energy usage and household characteristics.
- **Total Pilot Costs:** RHA will collect data on pilot implementation costs to gain a better understanding of grid impacts and associated costs, BTM costs associated with installation of electric appliances in scope for a community, as applicable.

Proposed Pilot Evaluation Analysis

The evaluation will provide weather-adjusted energy consumption and bill impacts for each pilot community. These impacts are quantified by the change in energy usage and electricity bills, namely from the reduction or elimination of propane or wood usage and the additional electricity usage from installed appliances. All customers in a pilot community may be eligible to receive treatment, thus it is not possible to identify a control group and a pre/post evaluation must be used to calculate impacts. In this case, the energy costs in the form of energy bills (both for electric and propane/wood/other fuels) is collected for one year prior to intervention and one-year post intervention, in the form of electric bills. To estimate pre-treatment wood and propane usage, RHA will utilize customer survey data as well as propane invoices provided by the customer where available. RHA proposes to report on impacts that cover a period of at least one-year post-intervention in order to have data that covers all weather conditions. To the extent it is possible to capture, RHA will also seek to identify the quantity, if any, of post-treatment propane usage. In communities where the number of treated customers is quite small, the results will be more sensitive to random noise caused by unrelated factors, like changes in household size or composition. Since customers may have the option of opting out of these pilots, RHA cannot guarantee a level of statistical precision because the total number of customers ultimately impacted will remain unknown until implementation is underway. Whatever the size of the participating population, RHA will utilize appropriate evaluation best practices to separate the usage and bill impacts of these interventions from random noise or other unrelated factors like anomalous weather conditions.

Database Development

It will be necessary to develop a database format to store pilot project data that is sufficiently consistent across pilot teams and the SJV DAC Data Gathering Plan that data from these interrelated efforts can be later easily merged. Data captured will be consistent across pilot studies as well as the data gathering effort, which will require pilot and data gathering teams' coordination. The database will be made available to parties while ensuring compliance with relevant state and federal customer privacy laws and Commission customer privacy decisions.

Impact Evaluation Timeline

The project evaluation timeline is largely dependent on the completion of the pilot study. RHA supports the decision's direction to report on impacts that cover a period of six months post-

intervention. Depending on the timeframe of these pilots, the Commission may choose to have one vendor conduct evaluations of all pilots in order to ensure consistency across studies. Including the one-year post-intervention data collection period, analysis, and reporting, a final evaluation report may be completed in 1.5-2 years following the end of the pilot study.

Process Evaluation

To supplement the pilot impact evaluation with qualitative insights around the administration of the program and the customer experience, PG&E, SoCalGas, and SCE plan to perform a joint process evaluation, per D.18-12-015. RHA will collaborate in this study, led by SoCalGas. We understand it will be used to evaluate the way the program is being delivered and provide recommendations on how the key features of the delivery could better meet the goals of the program while also being cost-effective. The process evaluation will generally focus on the following topics:

- The effectiveness of the CEN Program approach in building a network of local, knowledgeable and trusted energy experts to support the pilot activities;
- How well the IOU PA/PI approach worked with regards to the implementation of the pilots, including the customer experience;
- The success of leveraging existing programs, especially community solar programs, low-income discount programs and EE programs to support the efficient operation of pilot households and reduce energy cost; and
- Customer barriers to adoption of electrification, and the extent to which customers' awareness, knowledge, and attitudes around electrification and EE changed as a result of the above approaches.

The scope of the process evaluation would be focused on topics that can yield the most constructive feedback on features of program delivery and their impacts on operations relative to their impact on the customer experience. Potential research tasks include:

- Interviews with program implementers, program administrators, and CENs;
- Interviews with other stakeholders;
- Interviews or surveys with participants to understand their experience, engagement, overall satisfaction, and impact on their day-to-day lives;
- Review of program related material and tools; and
- Observations of operations and review of procedures and workflow.

Process Evaluation Timeline

D.18-12-015 stipulates that the joint IOUs will establish a process evaluation timeline. A request for extension was receive and SoCalGas will have a contract in place for a process evaluation contractor by April 30, 2020. In order to develop a statement of work with sufficient detail to obtain viable and complete proposals from vendors, the pilot implementation plans should be well defined and in progress in the communities.

Coordination with Data Gathering Track

The pilots and subsequent pilot evaluations will be implemented on a concurrent but separate timeline as the Data Gathering Track. Data collected by pilot contractors in each of the pilot communities should be shared with the Data Gathering contractor, and, accordingly, data collected by the Data Gathering contractor in pilot communities should be conducted in close coordination with the pilot contractors.

Universal data collection instruments and forms will be developed as part of the Data Gathering Track. This will enable efforts to coordinate resources and maximize the value of the data collection that occurs during both pilot implementation and Data Gathering in the greater SJV.

Leveraging Existing Programs

Pilot participants may not be aware of the existing programs and discount rates available to them to help reduce their overall energy bill. As described in D.18-12-015, the SJV DAC pilots must leverage and coordinate with all existing programs and rate options. The CEN will be the first point of contact to educate and provide information on applicable programs and rates, so that qualified pilot participants can take advantage of these existing programs and rates, but not limited to the programs listed below, to lower their overall energy costs.

Rate Discount Programs

As part of the pilot enrollment process, the CEN will inform customers about the following programs, assist in determining qualification, and enroll customers in, or refer them to, the following rate programs: All-Electric Baseline, CARE/FERA, Medical Baseline, Disadvantaged Communities-Green Tariff (DAC-GT) and Community Solar-Green Tariff (CS-GT). The DAC-GT and CS-GT programs offered to customers in the SJV Pilots will follow the rules and requirements specified in D.18-06-027 with a few exceptions and modifications as directed in the Decision.

Direct Install Energy Savings Assistance Program

RHA has considered the requirement to leverage this pilot with other programs, especially the Energy Savings Assistance (ESA) program. Because we expect most Pilot participants also may qualify for ESA, it is critical that the pilot implementer is also an ESA contractor to ensure that leveraging is as seamless as possible for the customer and interruptions are minimized.

We expect that Pilot customers will enter the program in two ways:

1. The CEN will identify and help customers apply for the Pilot program. The CEN will be provided criteria to pre-screen the customer for ESA. If the pre-screening criteria are met, the CEN will notify RHA. When the PI makes an appointment for the pilot home assessment, they will also enroll the customer in ESA.
2. The PI identifies an ESA customer who meets the pilot pre-screening criteria. In these instances, the customer's information will be submitted the CEN for eligibility determination and to complete a program application.

Once a customer has applied for the pilot program, the PI foreman will conduct a comprehensive home assessment to determine the feasibility of Pilot-specific measures, ESA and other leveraged program measures, if applicable. If a pilot customer also qualifies for ESA, we will leverage the maximum ESA Minor Home Repair dollars toward the total remediation needs identified in the customer's Home Treatment Plan.

Although called out in the decision to leverage also the Moderate-Income Direct Install (MIDI) Program, the MIDI program is sunsetting in 2019. We recognize that new residential programs may emerge from the current 3P solicitation process. Where appropriate, RHA agrees to leverage these programs as they become operational.

Solar Programs

California Solar Initiative Thermal Program (CSI-Thermal)

The decision directs program administrators to work with CSI-Thermal Administrators to offer CSI-Thermal where eligible and feasible and especially where heat pump water heaters (HPWH) are infeasible.[14] In their outreach to pilot community households, the CEN will include existing CSI-Thermal marketing material that has been tailored to pilot homeowners.

Customers will be encouraged to enroll if CSI-Thermal is a possibility in order to reserve the funds for any potential CSI-Thermal participant as the CSI-Thermal Program approaches its sunset date.[15] At the time of the home assessment, the Pilot Implementer will conduct a cursory evaluation for CSI Thermal if it appears that installation of a HPWH is infeasible. The pre-qualification information will be provided directly to a CSI Thermal implementer. CSI-Thermal outreach must be coordinated with PG&E, who has committed to this coordination as evidenced in the attestation letter in Appendix D required per the Decision.

Disadvantaged Communities Green Tariff (DAC-GT) and Community Solar Green Tariff (CS-GT) Programs

The DAC-GT Program will be available to residential customers who live in DACs and meet the income eligibility requirements for the CARE and FERA programs. PG&E is currently working on the development and implementation of the DAC-GT and CS-GT Programs. On August 20, 2018, PG&E submitted Advice Letter 5362-E to "Establish and Implement the Disadvantaged Communities Green Tariff (DAC-GT) Program Rate and the Community Solar Green Tariff (CS-GT) Program Rate", and on November 11, 2019, PG&E filed a supplemental Advice Letter 5362-E-D, which is pending Commission approval as of the writing of this advice letter.

D.18-12-015 requires PG&E to solicit CS-GT projects in the following SJV pilot communities: Allensworth, Cantua Creek, Seville, Alpaugh, Fairmead, Lanare, LeGrand. Until CS-GT projects are

[14] SJV DAC Pilots Decision, pp. 91 and 113.
[15] PG&E AL 4067-G.

built and online to offer solar electricity to pilot community customers, PG&E will seek to enroll all eligible pilot community residents in these communities onto the DAC-GT Program upon program launch.[16] Once the CS-GT projects come online and are available for customer enrollment, PG&E will transfer customers that are eligible for participation under these CS-GT projects over to those projects. SJV pilot community customers enrolled under DAC-GT that are not located within 40 miles of a CS-GT project will remain on the DAC-GT Program. In the community of La Vina, RHA will offer the DAC-GT and DAC-SASH (Single-Family Affordable Solar Housing)[17] programs to customers. RHA will coordinate directly with PG&E to ensure that pilot participants who qualify for these programs are served.

DAC-SASH

Modeled on the existing, SASH Program, DAC-SASH will provide up-front financial incentives for solar installation on homes owned by low income residents in DACs statewide. The program will allow for greater eligibility and help overcome barriers like lack of access to capital or credit. DAC-SASH will provide $10 million in incentives annually through 2030, to be funded by utility GHG allowance revenues or public purpose program funds. Grid Alternatives has recently been selected by the CPUC to administer the DAC-SASH Program.[18]

RHA has engaged GRID Alternatives regarding coordination of this pilot with DAC-SASH and includes an attestation letter documenting their commitment[19] to coordination in Appendix E, similar to that required for CSI-Thermal. For more information on DAC-SASH, please contact the program administrator, GRID Alternatives.

Self-Generation Incentive Program (SGIP)

Decision 19-09-027 sets aside $10 million in SGIP incentives for the SJV DAC pilot communities.[20] Access to these incentives will ensure that Pilot participants who replace exiting wood or propane appliances with electric, which will result in an increased electric load, can benefit from installing storage to manage increased electricity costs. At the time of application, the CENs hold the responsibility of educating all pilot customers on rate, discount and rebate program available to them, which includes SGIP. CENs will receiving training on the SGIP program to impart to customers. The Pilot Implementer will also receive training and be able to answer any additional questions the customer may have regarding SGIP at the time of assessment.

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[16] Per the DAC-GT Program rules, customers must be eligible for the CARE and/or FERA Program to be eligible to enroll under DAC-GT, as well as meet all other program eligibility requirements.

[17] As described in D.18-06-027.

[18] https://www.solarpowerworldonline.com/2019/03/grid-alternatives-cpuc-solar-environmental-justice-program/.

[19] California Public Utilities Code Section 382. All references to Code hereinafter refer to California Public Utilities Code.

[20] Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues, R.12-11-005, September 18, 2019, OP 6 (D.19-09-027).

RHA recognizes both the requirement to, and importance of, including battery storage in the pilot efforts. In collaboration with expert organizations, such as California Solar + Storage Association and Tesla, we developed a cursory evaluation to be conducted at the time of the assessment. Similar to the assessments for solar PV and solar thermal, this evaluation will determine the feasibility of battery storage in all pilot homes. This pre-qualifying information will be shared directly with a SGIP provider, dedicated to installing battery storage in the SJV DAC pilot communities, so that pilot customers can take advantage of the benefits offered through SGIP. To the extent possible, the Pilot Administrator will coordinate installation of other pilot measures with the SGIP provider to reduce customer burden.

Reporting

RHA will follow the following reporting guidelines per D.18-12-015:

- Quarterly reporting of aggregated, anonymized pre/post bill impact data for all households that receive appliance upgrades will be filed and served and provided to the Low-Income Oversight Board and Disadvantaged Communities Advisory Group;[21]
- Quarterly reporting on substandard housing remediation costs and needs in pilot community households,[22] including data from CPM on other funding sources,[23] and tracking of households prevented from participation due to remediation issues;
- Quarterly report on budget spend, average costs per household, and potential for exceeding budgets provided in the decision;
- Annual Pilot Progress Reports[24] (December 19) on overall program metrics such as households enrolled and treated, detailed budget report, and reliability complaints and issues affecting pilot communities, detailed leveraged programs and barriers report, summary of customer issues and complaints, and potential unanticipated outcomes;
- Attend and present at Commission-organized workshops during pilot implementation to summarize progress, lessons learned and implementation barriers;[25]
- Final Project Evaluation, including impacts and benefits of various technologies provided[26]
- WE&T-related reporting: Local hiring activities and results, work hours and types of work, workforce demographic and certification/licensing information;[27]
- 180-day Pilot Evaluation Report for RHA-administered pilots to be served 180 days following RHA's collection of one year's billing data for participating households in

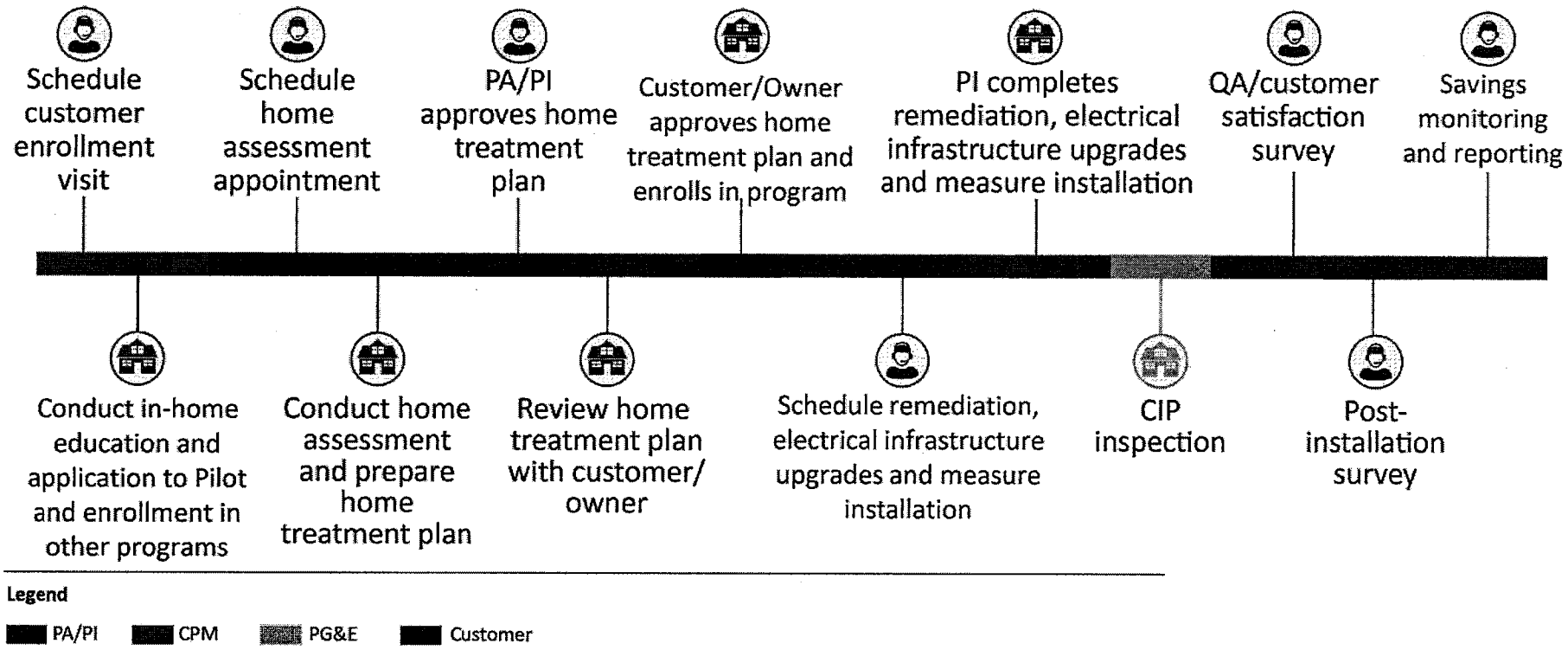
[21] D.18-012-015 p. 78.
[22] D.18-012-015 pp. 93 and 97.
[23] D.18-012-015 pp. 93 and 83.
[24] *SJV DAC Pilots Decision*, p. 129.
[25] *SJV DAC Pilots Decision*, pp. 129-130.
[26] *SJV DAC Pilots Decision*, p. 88.
[27] *SJV DAC Pilots Decision*, p.

each third-party Electric Pilot Community;[28]

- Within 90 days of completion of implementation activities, file a Tier 1 advice letter documenting adherence to safety plan, describing issues encountered and summarizing methods to ensure retention of accurate records for purposes of maintenance and warranties;[29] and
- Final report, including final evaluation results, process evaluation results, lessons learned, potential unanticipated outcomes, etc.

[28] *SJV DAC Pilots Decision*, p. 126.
[29] SJV DAC Pilots Decision, OP 12.

Appendix A: High Level Customer Journey



Appendix B: Additional Workforce Education and Training Information

Recommended License and/or Registration to Install Pilot Measures

Measure	Recommended License and/or Registration
Hot Water Appliances	
Heat Pump Water Heater (Including grid responsive and hybrid types)	C-20, or C-36
Solar Hot Water System	C-46
Electric Resistance Water Heater	C-36
Space Conditioning	
Heat Pump Space Heater (Including central split or multi-zone system)	C-20
Mini-Split Ductless System	C-20
Central Split System with Ducting (Including grid responsive type)	C-20
Other Appliances	
Standard Electric Range	EAR (BHGS)
Energy Star Electric Dryer	
Ceramic-top Electric Range	
Induction Electric Range	
Weatherization	
Various Measures	B, C-2, or D-65
Electrical Upgrades	
Various Measures	C-10

Selection of California License Types

License and/or Registration Details	
Class "B"	General Building Contractor
Class "C"	Specialty Contractor (see below for selection of relevant Class "C" licenses)
C-2	Insulation and Acoustical Contractor
C-10	Electrical Contractor
C-20	Warm-Air Heating, Ventilating and Air-Conditioning Contractor
C-36	Plumbing Contractor
C-46	Solar Contractor
C-61 "D" Subcategories	Limited Specialty Classifications Subcategorized by "D" Class
D-65	Weatherization and Energy Conservation
Source: California Contractors State Licensing Board, Description of Classifications (2015), available at http://www.cslb.ca.gov/Resources/GuidesAndPublications/DescriptionOfClassifications.pdf	
EAR (BHGS)	Electronic and Appliance Repair (California Bureau of Household Goods and Services)
Source: California Bureau of Household Goods and Services (2016), https://bhgs.dca.ca.gov/	

Appendix C: Minimum Warranty Requirements

1.0 INTRODUCTION

1.1 This appendix lists warranty requirements, in accordance with state-wide policy, for each measure installed in the ESA Program. These are *minimum* requirements. Each individual utility may have more stringent warranty requirements.

1.2 Warranty Categories/Types

1. Warranty requirements are divided into two categories:
   a. Contractor Warranty and
   b. Manufacturer Warranty.
2. Each category is subdivided into two types:
   a. Materials and
   b. Labor.

1.3 Warranty Time Periods

1. Time periods are stated in years, unless identified as being in days (e.g., "90 days").
2. The appearance of "n/a" in a field indicates that there is no warranty requirement for that category.
3. The appearance of "—" in a field indicates that, for that type of coverage, there is no warranty requirement.

1.4 Repair/Replacement: Within some fields, there is a time period for a unit that is repaired, indicated by "(Repair)," and a different time period for a unit that is replaced, indicated by "(Replacement)."

1.5 Component Type: Within some fields, the type of component for which the warranty period applies is indicated in parentheses. For example, for Sec. 12, Window Replacement:

1. "(IGU)" means the warranty period applies only to the insulated glazing unit (IGU).
2. "(Other)" means the warranty period applies to all other components of the window.

2.0 MINIMUM WARRANTY REQUIREMENTS PER MEASURE

IS Section No.	IS Measure	Contractor Warranty		Manufacturer Warranty	
		Materials	Labor	Materials	Labor
1	Caulking	1	1	10	n/a
2	Weatherstripping	1	1	3	n/a
3	Attic Insulation	1	1	1	n/a
4	Central A/C Tune-Up	1	1	1	n/a
5	Water Heater Tank Insulation	1	1	1	n/a
6	Water Heater Pipe Insulation	1	1	1	n/a
7	Cover Plate Gaskets	1	1	1	n/a
8	Energy-Saver Showerheads and Faucet Aerators	1	1	3 (showerheads) 1 (aerators)	n/a
9	Evaporative Cooler and A/C Vent Covers	1	1	1	n/a
10	Duct Testing and Sealing	1	1	1	n/a
11	Exterior Door Replacement	1	1	1	n/a

IS Section No.	IS Measure	Contractor Warranty		Manufacturer Warranty	
		Materials	Labor	Materials	Labor
12	Window Replacement	1	1	10 (IGU) 3 (Other)	n/a
13	Glass Replacement	1	1	1	n/a
14	LED Screw-Based Bulbs	1	1	1	n/a
15	LED Fixtures	1	1	1	n/a
16	Window/Wall Evaporative Cooler Installation	1	1	5 (Pan) 1 (Other)	n/a
17	Refrigerator Replacement	1	1	1	n/a
18	Natural Gas Central Forced Air Heating System Repair and Replacement	1 (Replacement) 90 days (Repair)	1 (Replacement) 90 days (Repair)	5 (Compressor) 90 days (Other)	n/a
19	Natural Gas Wall and Floor Furnace Repair and Replacement	1 (Replacement) 90 days (Repair)	1 (Replacement) 90 days (Repair)	1 (Replacement) 90 days (Repair)	n/a
20	LED Night Lights	1	1	1	n/a
21	Central High-Efficiency A/C and Heat Pump Replacement	1	1	5 (Compressor) 1 (Other)	n/a
22	Window/Wall A/C and Heat Pump Replacement	1	1	5 (Compressor) 1 (Other)	n/a
23	Natural Gas Storage Water Heater Replacement	1	1	5 (Tank) 1 (Other)	n/a
24	Natural Gas Appliance Testing (NGAT)	n/a	n/a	n/a	n/a
25	Microwave Ovens	1	1	1	n/a
26	Furnace Cleaning and Tune-up	n/a	90 days	n/a	n/a
27	Thermostatic Shower Valves	1	1	1	n/a
28	High-Efficiency Clothes Washers	1	1	1	n/a
29	Forced Air Unit (FAU) Standing Pilot Light Conversion	90 days	90 days	90 days	n/a
30	Energy-Efficient Variable Speed Pool Pump Replacement	1	1	1	n/a
31	Natural Gas Water Heater Repair	90 days	90 days	90 days	n/a
32	Smart Fan Delay/Efficient Fan Controller	1	1	1	n/a
33	Tier 1 Smart Power Strips	1	1	1	n/a
34	Vacancy Sensor Switches	1	1	1	n/a
35	LED Torchiere Replacement	1	1	1	n/a
36	Tier 2 Audio-Visual Advanced Power Strips	1	1	1	n/a
37	LED Downlight Retrofit Kits	1	1	1	n/a

IS Section No.	IS Measure	Contractor Warranty		Manufacturer Warranty	
		Materials	Labor	Materials	Labor
38	Thermostatic Tub Spout/Tub Diverter	1	1	1	n/a
39	Prescriptive Duct Sealing	1	1	1	n/a
40	Heat Pump Water Heaters	1	1	1	n/a
14	Thread-Based CFLs (archived measure)	1	1	1	n/a
15	Hard-Wired CFFs (archived measure)	1	1	1	n/a
35	Fluorescent Torchiere Lamp Replacement (archived measure)	1	1	1	n/a

Minimum Appliance Warranty Requirements

Appliance	Manufacturer's Equipment Warranty	Contractor's Installation Warranty	Servicing and Maintenance[11]
Electric Cooktop	2 years from install	2 years from install	5 years from install
Conventional Electric Clothes Dryer			
Heat Pump Water Heater	5 years from install	5 years from install	
Heat Pump Clothes Dryer (if offered)			
Heat Pump Space Heater/Cooler			
Electrical Infrastructure Upgrades	Default Manufacturer Warranty	Default Contractor Warranty	None
ESA Program Measures	See Appendix F of CISM	See Appendix F of CISM	None
Existing-Program Measures	Refer to Applicable Program	Refer to Applicable Program	None

Appendix D: PG&E CSI-Thermal Attestation Letter

The California Public Utilities Commission's (CPUC) "Decision Approving San Joaquin Valley Disadvantaged Communities Pilot Projects," Decision 18-12-015, requires investor-owned utilities, or a designated Pilot Administrator/Pilot Implementer, to coordinate with the CSI-Thermal Program.

Richard Heath & Associates, Inc. (RHA) and Pacific Gas & Electric Company (PG&E) attest:

1. In the third-party pilot communities located in PG&E service territory:
    a. As RHA administers the pilot program in the targeted communities of Alpaugh, Fairmead, Lanare, La Vina and Le Grand, RHA, its contractor or Community Energy Navigators (CENs) may identify participants who are interested in solar thermal. These participant(s) will be referred to PG&E's CSI Thermal Program.

I declare that this letter is accurate and true to the best of my knowledge.

RHA Representative: Cynthia Bruno Rafferty, Chief Executive Officer

/S/ Cynthia Rafferty
Signature

12/31/2019
Date

I declare that this letter is accurate and true to the best of my knowledge.

PG&E Representative: Tiffany Hanson, CSI Thermal Program Manager

Signature

12/31/2019
Date

Appendix E: GRID Alternatives Attestation Letter

The California Public Utilities Commission Decision 18-12-015 issued on December 19, 2018, approving San Joaquin Valley Disadvantaged Communities Pilot Projects (SJV Pilot), required investor-owned utilities to coordinate with the Single-Family Affordable Solar Homes Program (SASH) and the SASH for Disadvantaged Communities (DAC-SASH) Program to leverage the program where feasible. Richard Heath Associates (RHA) and GRID Alternatives attest:

1. In pilot communities located in SCE's and PG&E's service territory:
   a. When RHA administers the SJV Pilot in the targeted communities, RHA, its contractor or Community Energy Navigators (CENs) may identify participants who are interested in and may be eligible for SASH and/or DAC-SASH. Participant(s) will be referred and if eligible, GRID Alternatives will engage participant(s) according to current SASH and/or DAC-SASH programs procedures, as long as funding is available.
   b. When GRID Alternatives administers the SASH and/or DAC-SASH programs in the targeted communities, GRID Alternatives or its contractors may identify participants who are interested in and may be eligible for the SJV Pilot. Participant(s) will be referred and if eligible, RHA, its contractor or CEN will engage participant(s) according to current SJV Pilot procedures, as long as funding is available.

I declare that this letter is accurate and true to the best of my knowledge.

/Cynthia Bruno Rafferty/ 12/20/19

Signature Date

I declare that this letter is accurate and true to the best of my knowledge.
GRID Alternatives Representative: Elise Hunter, Policy & Regulatory Affairs Director

/ Elise Hunter/ 12/20/19

Signature Date

Appendix F: Evaluation Data Elements

Primary Desired Outcomes/Objectives and Data Elements	
1	**Ensure Equitable Access to Affordable Energy Options to Communities and Households**
	Number of options provided and short description
	Number and percent of households choosing each option
	Household participating per option
	Households declined per option
	Households unwilling per option
	What percentages opted in to pilot after initial outreach
	What percentages opted out of pilot after initial outreach
	What percentage opted in after assessment
	What percentage opted out after assessment
	Customer understanding of changes to rate and usage
2	**Reduce Energy Burden of Participating Households**
	Cost per household
	Pre- and post-pilot energy costs
	Electric
	Propane/oil/wood
3,4,5,6	**Non-Energy Benefits - General / Health / Safety / Environmental**
	Pre-existing health conditions
	Number of emergency room visits
	How often residents are ill
	Air temperature comfort
	Reduction in fires
	Reduction in burns
	Pre- and post-pilot outdoor air quality measurements (flue gas emissions)
	Pre- and post-pilot indoor air quality measurements (PM2.5)
	Greenhouse gas emissions impacts
7	**Non-Energy Benefits - Local Hire and/or Workforce Development**
	Number or percentage of local residents hire to support pilots
	Customer requested job opportunities e.g., service and maintenance
	Community requested job opportunities
	What were successes of local hire
	What were limitations of local hire
	What are best practices for local hire development
	What are best practices for local workforce development
8	**Non-Energy Benefits - Reliability**
	Electrical Outages
9	**Appropriately Minimize Rate and Bill Impacts for Non-Participating Customers**

	Non Pilot ratepayer changes - outside of DAC communities
	Non Pilot ratepayer changes - inside of DAC communities
	Total costs to implement pilots
	Cost to participating customers - specific to rate and bill impacts
	What impact do vary levels of electric rate subsidies have on customer participation rates
	Minimum project size to achieve economies of scale and thus to reduce costs
	How many measures installed vs. amount spent per participating households
	HH conditions / remediation amount spent per participating households
	Cost reductions were achieved:
	Bulk purchasing
	leverage of existing programs
10	**Effective Engagement Strategies and Appropriate Flow of Benefits to Landlords and Tenants**
	Outreach received
	Informed on Pilot options
	Customer satisfaction with their pilot experience
	What proportion of landlords agreed to participate in the pilots
	Strategies least and most successful in securing landlord participation
	Landlord engagement
	Landlord WTP - % participate/not
	Customer WTP - % participate/not
11	**Minimize Residual Wood and Propane Use**
	Baseline use of propane/wood combustion
	Residual use of propane/wood combustion
	Percentage of households retained propane or wood-burning equipment per option
	Percentage of households report using these residual energy sources monthly or more after pilot per option
12	**Participant Options & Customer Preferences for Electrification**
	Why was option(s) chosen
	Customers' bill savings affected by the intensity of the home retrofit
	How do bill savings compare to overall program cost across different "packages/options"
	Rate changes
	Are customers differentially interested in the different packages?
	Incentives to electrify, such as an in-community solar option, an out-of community solar option, electric bill discounts, etc.?
	What portion of the community will adopt new technologies and whether this will change over time
	Interest in new technology / likelihood of customer to adopt new technology
13	**Identify Barriers to Customer Participation and Options to Mitigate**
	Customer barriers: Language, immigration status, structural condition of home, ownership, time investment vs. pilot benefits, availability
	What aspects of the process will be / were most challenging for customers
	Landlord WTP - barriers
	Pilot implementers and/or participating contractors barriers: customer availability, language, multi program coordination

14	**Best Practices to Provide Below-Code and /or Structurally-Unsound homes with Affordable Energy Options**
	Approaches to reduce energy burden in homes with many code violations
	What alternative funding sources or programs where offered
	What alternative funding sources or programs where leveraged were applicable
15	**Improve Understanding of the Impact of Electric Rate Structures on Energy Burden and Affordability**
	Pre- and post-pilot usage data
	Cost (rate comparisons) pre- and post-pilot e.g., CARE vs non-CARE customer
	Were bill protections necessary to keep bills affordable to participants
16	**Advance Technical Understanding of Challenges of Scaling Options to All SJV DACs**
	Number of households requiring wiring, service panels, smart meter upgrades
17	**Identify Effective Community Outreach Approaches**
	Number of survey responses per community
	Townhall participation per community
	Pilot enrollment through CEN/CBO
	Total pilot participants (post install / project totals)
	Participation because of pilot outreach or community / neighbor
18	**Improve Understanding of SJV DAC Household Energy Behaviors**
	How much do customers use the various appliances pre- and post-pilot
	Satisfaction with the new appliances
	Was appropriate education provided to support required behavioral changes for heat pump technology
	Did behavioral change post install
19	**Identify General Learnings**
	Administration, assessment & installation - invested time to execute
	Who benefited the most, e.g., owner, tenant, future tenant
	Unsafe conditions that restricted participation or installation (e.g. unsafe working conditions)
20	**Identify Household Demographics & Home Conditions**
	Size of home (sq foot)
	Type of home
	# in household
	Ownership status
	Appliances used
	Non-gas appliances
	Upgrades needed
	Property Feasibility – pass or fail

CPUC Service List: R.15-03.010
Last Changed: May 5, 2020

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