

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to Advance
Demand Flexibility Through Electric
Rates.

Rulemaking 22-07-005

**OPENING BRIEF OF THE PUBLIC ADVOCATES OFFICE REGARDING
TRACK A OF THE ORDER INSTITUTING RULEMAKING TO ADVANCE
DEMAND FLEXIBILITY THROUGH ELECTRIC RATES**

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TABLE OF CONTENTS

PAGE

TABLE OF AUTHORITIES..... iv

I. INTRODUCTION 1

A. What directions should the Commission provide for the development of an ME&O plan for the first IGFCs? 1

1. What topics should residential customers receive ME&O about before IGFCs are implemented?..... 1

2. Should the Commission direct investor-owned utilities (IOUs) to develop a single, statewide ME&O plan or individual ME&O plans for each utility? 2

3. If the Commission directs IOUs to develop individual ME&O plans, should the IOUs develop consistent messages about IGFCs or custom messages and materials that differ for each utility? 4

4. If the Commission authorizes an ME&O working group, what should be the scope of work for this working group (e.g., should it include ME&O for small and multijurisdictional utilities (SMJUs), development of messages about IGFCs, and/or propose ME&O budgets)? When should the working group proposal be due?..... 5

5. If the Commission authorizes the hiring of a consultant to assist an ME&O working group, what should be the consultant’s scope of work (e.g. facilitation, research, drafting), criteria for selection, and budget? What would be the proportional cost share of each IOU for the consultant?..... 6

B. What reporting requirements and directions for developing an evaluation plan should the Commission approve for the first IGFCs? 7

1. The following responses assume a First Version of IGFCs with bracket breakdowns as described in section II. What reporting metrics should we establish for the first IGFCs? 7

TABLE OF CONTENTS
(Con't)

	<u>PAGE</u>
2. How often should reports for the first IGFC be distributed, and how should the reports be distributed?.....	8
3. Should we require an independent evaluator for the first IGFCs? If so, what should be the scope of work, criteria for selection, and budget for the independent evaluator?	9
4. Which questions should the evaluation of the first IGFCs address?	9
5. What implementation period should the first evaluation report consider (e.g., first 12 or 18 months of implementing the first IGFCs)?	10
C. What are the estimated implementation costs of the first version of IGFCs, and how should these costs be tracked and recovered?	11
1. What are the estimated costs of modifying each IOU’s billing systems for the first IGFCs if the Commission authorizes three tiers for IGFCs?	11
2. Other than billing system changes, and ME&O, are there other estimated costs for implementing the first IGFCs? Provide a breakdown of implementation costs by category.	11
3. How should the implementation costs of the first IGFCs be recovered?	11
D. What timeline and procedural pathway should the Commission adopt for implementing the first version of IGFCs and developing and adopting the second version of IGFCs?.....	12
1. Should the Commission provide enough direction for the first IGFCs in the upcoming Track A decision for utilities to file advice letters to implement the first IGFCs rather than file rate design window applications?	12
2. If the Commission authorizes utilities to file advice letters to implement the first IGFCs after the upcoming Track A decision, when should the advice letters be filed? When should the first IGFCs be applied to customer bills?	14

TABLE OF CONTENTS
(Con't)

	<u>PAGE</u>
3.	Should the Commission authorize a working group to develop a proposal for income verification and tiers for the second version of IGFCs? If so, (i) what should be the scope of work for the working group, (ii) how much time should the working group be given to develop a proposal? 15
4.	Should the Commission authorize hiring a consultant to advise Energy Division staff or a working group on income verification for the second version of IGFCs? If so, what should be the scope of work and budget for the consultant? What should be the criteria for selecting a consultant (e.g., experience as a third-party administrator of income verification processes)? What should be the proportional cost share of each IOU for the consultant? 16
5.	When should the Commission consider the design of the second version of IGFCs? Should the timing depend on reviewing a certain number of months of implementation data for the first IGFCs, and/or consideration of a working group proposal for income verification and tiers for the second version of IGFCs? 17
6.	Should the timeline or procedural pathway for SMJUs' IGFCs differ from the implementation pathway for large IOUs? If so, please explain why it should differ and specify how it should differ. 18
II.	NEW PROPOSAL FOR A FIRST VERSION OF INCOME-GRADUATED FIXED CHARGES THAT RELY ON EXISTING CARE AND FERA INCOME VERIFICATION PROCESSES, INCLUDING PREFERRED TIER LEVELS AND FULL RESULTS FROM THE E3 TOOL..... 18
III.	CONCLUSION..... 27

TABLE OF AUTHORITIES

PAGE

COMMISSION RULE OF PRACTICE AND PROCEDURE

Rule 13.12..... 1

CALIFORNIA PUBLIC UTILITIES CODE

Section 739.9(e)(1) 2, 14

BEFORE THE PUBLIC UTILITIES COMMISSION
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**OPENING BRIEF OF THE PUBLIC ADVOCATES OFFICE REGARDING
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DEMAND FLEXIBILITY THROUGH ELECTRIC RATES**

I. INTRODUCTION

Pursuant to California Public Utilities Commission (Commission) Rule of Practice and Procedure (Rule) 13.12, and the Administrative Law Judge’s (ALJ) *Ruling Addressing the Track A Procedural Schedule, Opening Briefs Guidance, and Exhibits*, (Ruling),¹ the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) timely files this opening brief. Cal Advocates addresses questions in the order the Ruling provides them. Cal Advocates adds Section III in which Cal Advocates proposes a “First Version” of income-graduated fixed charge, pursuant to the ALJ’s Email Ruling allowing for such a proposal.²

A. What directions should the Commission provide for the development of an ME&O plan for the first IGFCs?

1. What topics should residential customers receive ME&O about before IGFCs are implemented?

Before Income Graduated Fixed Charges (IGFCs) are implemented, residential customers should receive Marketing, Education & Outreach (ME&O) that explain a number of topics. Similar to the education that customers received before defaulting to

¹ Ruling, August 22, 2023, at 3.

² Clarifying ALJ Ruling On Track A Briefs, Opening Briefs, And Exhibits, August 24, 2023.

time of use (TOU) rates, customers should receive education on what IGFCs are and their intended purpose.³ In particular, such topics could include:

- An explanation to customers of what IGFCs are, including an explanation that customers in a relatively lower-income class will receive a relatively lower fixed charge;
 - An explanation that IGFCs reduce volumetric charges, minimize bill impacts for low-income customers, and incent electrification without increasing the revenue requirement that an investor-owned utility (IOU) recovers;
 - An explanation as to how an IGFC will apply to each customer;
 - The statutory requirements to employ fixed charges on an income-graduated basis;⁴ and
 - Information on eligibility for different income brackets, as well as the means for moving to a lower income bracket.
- 2. Should the Commission direct investor-owned utilities (IOUs) to develop a single, statewide ME&O plan or individual ME&O plans for each utility?**

The Commission should direct IOUs to develop a single statewide ME&O plan, that uses a common outline, and applies common metrics to measure ME&O effectiveness. However, the statewide plan should accommodate for the unique needs of each IOU and its customers as well. Each of these are discussed in more detail here.

As part of the structure of the statewide plan, the Commission could require the IOUs to follow a common outline similar to the one used in the TOU rulemaking. With input from a working group, in another Rulemaking the Commission approved a common

³ Exhibit (Ex.) Joint IOUs-01-E2, Joint Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company (the Joint IOUs) Describing Income-Graduated Fixed Charge Proposals, at 115:17-22.

⁴ Cal. Pub. Util. Code Section 739.9(e)(1).

outline for each IOU to present its ME&O plan regarding TOU rates for Commission and stakeholder consideration.⁵ The common outline included such topics as:⁶

- Background and Objectives for the ME&O plans.
- A description of the IOU's customer base and ME&O segmentation strategies to reach specific groups (such as hard to reach or economically vulnerable).
- A section that describes lessons from previous ME&O efforts. This section could detail how each IOU is leveraging the learnings from the TOU transition.
- A section that outlines each IOU's detailed marketing plan including timing of communications, communications messaging, tools to help customers choose the correct rate for them based on the new IGFC structure, tools, and strategies to reach specific customer groups.
- A section that explains each IOU's plan to quantitatively measure ME&O effectiveness throughout the transition.
- A detailed budget of each ME&O activity.

Given the specific needs of each IOU, the statewide plan should allow each IOU to identify its unique needs that relate to IGFC implementation. For example, certain IOUs may require more or less time than others to implement the First Version of IGFCs given the time it will take to prepare their respective billing systems.⁷ The statewide ME&O plan could help customers' awareness of each IOU's anticipated schedule to effectively implement the First Version of the IGFCs.

⁵ Ex. Cal Advocates-05, Supplemental Opening Testimony of the Public Advocates Office with Excerpts from Party Comments that Only Contain Material Facts (No Policy or Legal Arguments) (Supplemental Opening Testimony), at 27, fn. 87, citing R.12-06-013, Administrative Law Judge's Ruling Inviting Prehearing Conference Statements and Setting Next Steps Following the September 12, 2016, Marketing Education and Outreach Workshop, September 30, 2016, at Attachment B: Common Outline for Rate Reform ME&O Plans.

⁶ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 27:11-28.

⁷ Ex. Cal Advocates-06, Supplemental Reply Testimony of the Public Advocates Office with Excerpts from Reply Comments that Only Contain Material Facts (No Policy or Legal Arguments) (Supplemental Reply Testimony), at 3:5-8; Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed-Charge Proposals, at 10:10-12.

To avoid unnecessary potential backlash, all ME&O communications with customers should make clear that the inclusion of the fixed charge does not increase utility revenues, and explain that if a customer experiences a bill increase in excess of the fixed charge amount, it is because the Commission approved utilities to collect more money from customers. Effective ME&O will provide customers insights into how their bill may change, so they do not interpret a perceived increase in their monthly bill to be a direct result of the implementation of IGFC.

3. If the Commission directs IOUs to develop individual ME&O plans, should the IOUs develop consistent messages about IGFCs or custom messages and materials that differ for each utility?

As a general principle, the IOUs should develop consistent messages about IGFCs. First, consistent messaging will help avoid customer confusion. To ensure consistency, the IOU messages should include the topics identified in Section 1.a.

Second, consistent messaging can enable IOUs to leverage one common piece of research of customer attitudes about rates related to IGFCs. A TOU working group engaged in such research in another rulemaking. The IOUs also submitted periodic updates on the progress of their efforts to assist customers with transition of residential customers to a default TOU rate.⁸

The Commission should establish a working group to discuss IGFC implementation issues and to recommend improvements to address such issues. Consistent messaging should also help a working group compare how effective each IOU's customer ME&O efforts are against the others.

Although consistent messaging is a good idea. IOUs may have specific reasons for discrete pieces of their messaging to differ from one another. These include differences in customer make up, projected bill impacts, climate zones, and relationships with

⁸ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 28, fn. 89, citing <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-rates/residential-rate-reform-r12-06-013>.

community-based organizations. The Commission should consider whether to allow such discrete differences on a case-by-case basis.

4. If the Commission authorizes an ME&O working group, what should be the scope of work for this working group (e.g., should it include ME&O for small and multijurisdictional utilities (SMJUs), development of messages about IGFCs, and/or propose ME&O budgets)? When should the working group proposal be due?

If the Commission authorizes an ME&O working group, the scope of work should include: 1) ME&O for the larger utilities and the small and multijurisdictional utilities (SMJUs); 2) development of messages about IGFCs; 3) proposed ME&O budgets; 4) the timing of implementation of ME&O; and 5) development of metrics to measure effectiveness of ME&O.

The Commission should allow parties to participate in an ME&O working group that would submit a proposal for party comments.² Such parties would include SMJUs.

The working group should discuss IGFC implementation issues and recommend improvements to address such issues. To facilitate such implementation and improvements, the working group's scope of work should include how to effectively message about IGFCs.

As noted above, with input from a TOU working group, the Commission approached a common outline for residential default TOU implementation, which included a detailed budget for each ME&O activity.¹⁰ Similarly, an IGFC working group should have such detailed ME&O budgeting within its scope of work.

The working group should provide the Commission an ME&O proposal by the third quarter of 2024 to quickly facilitate ME&O in a timely manner and not delay IGFC implementation.¹¹ The working group could begin discussions even before the Commission votes on a Decision to avoid any delays.

² Ex. Cal Advocates-05, Supplemental Opening Testimony, at 2:26-27.

¹⁰ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 27:9-12, 28.

¹¹ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 3, Timeline Table.

5. If the Commission authorizes the hiring of a consultant to assist an ME&O working group, what should be the consultant’s scope of work (e.g. facilitation, research, drafting), criteria for selection, and budget? What would be the proportional cost share of each IOU for the consultant?

The Commission should establish a working group to provide ME&O support, without a consultant. As shown above, the TOU implementation working group experience can be applied to develop an ME&O proposal for IGFC, which would make hiring a consultant unnecessary.

The Commission should avoid a hiring ME&O consultant here because it would risk repeating a bad experience regarding a TOU consultant. The TOU consultant was received an expensive contract and was opaque about how it charged funding. consultant received 73% of the total funds set aside for community-based organization (CBO) outreach, but CBO’s received only 23% of the total funds, with no justification.¹² That same consultant spent nearly the entire statewide ME&O program budget during a period when only San Diego Gas & Electric Company (SDG&E) defaulted customers to TOU rates,¹³ leaving no budget for ME&O in the other two IOU service territories. That consultant also claimed cost overruns, but did not show how it used any of that funding.¹⁴

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¹² Ex. Cal Advocates-05, Supplemental Opening Testimony, at 27, fn. 84, citing R.12-06-013 Phase 5: Cal Advocates’ Comments of The Public Advocates Office on The Alternate Proposed Decision Addressing Phase 5 Issues and the 2016 Order to Show Cause, served 3/16/2020, at 4.

¹³ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 27, fn. 85, citing R.12-06-013 Phase 5: Cal Advocates’ Comments of The Public Advocates Office on The Alternate Proposed Decision Addressing Phase 5 Issues and the 2016 Order to Show Cause, served 3/16/2020, at 2- 3

¹⁴ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 27, fn. 86, citing R.12-06-013 Phase 5: Cal Advocates’ Comments of The Public Advocates Office on The Alternate Proposed Decision Addressing Phase 5 Issues and the 2016 Order to Show Cause, served 3/16/2020, at 5.

B. What reporting requirements and directions for developing an evaluation plan should the Commission approve for the first IGFCs?

1. The following responses assume a First Version of IGFCs with bracket breakdowns as described in section II. What reporting metrics should we establish for the first IGFCs?

For the First Version IGFC, the Joint IOUs propose an IGFC that is largely based on existing California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) processes and data. The Joint IOUs claim there is no need for a working group to develop extensive new reporting requirements or evaluation plans for the First Version IGFC; they envision a First Version IGFC implementation where the rate design, cost recovery, and programmatic requirements, such as reporting, are articulated in detail within the 2024 decision such that the initial implementation can occur through a Tier 2 Advice Letter. However, if the Commission determines that a working group is necessary, the Joint IOUs advocate for an expedited working group process with limited meetings, in order to avoid delaying implementation.¹⁵

Cal Advocates agrees with the Joint IOUs' proposal to have an expedited working group with limited meetings. In the TOU Rulemaking, a TOU ME&O working group collaborated to develop a common set of metrics to evaluate the progress of ME&O effectiveness in increasing customer knowledge about TOU rates.¹⁶ Such metrics have been included in a PG&E Advice Letter regarding Marketing, Education, and Outreach in a prior proceeding.¹⁷ The IOUs also discuss pre-/post implementation evaluations on the awareness and understanding of the new IGFC rate structure.¹⁸ Progress toward these

¹⁵ Ex. Joint IOUs-04, Supplemental Testimony, at 26-27.

¹⁶ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 28:1-4.

¹⁷ Ex. Cal Advocates-0 at 28:1-6, n. 88, referencing, PG&E Advice Letter 4949-E. (See in particular, Advice Letter at 121-122 for metrics.)

¹⁸ Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 27.

metrics could be measured in multiple surveys in each IOU's territory throughout the transition process.^{19 20}

Throughout the transition process, the IOUs administered surveys in each service territory. The working group metrics were measured using those survey results. In this way, the IOUs evaluated how effectively ME&O had increased customer knowledge about TOU.²¹ The IOUs could use similar metrics specific to IGFC implementation to evaluate the transition to IGFCs. If necessary, the IGFC ME&O working group could collaborate to develop a common set of metrics to evaluate the progress of ME&O effectiveness in educating customers about IGFCs and a proposal should be put forward by the third quarter of 2024 for expeditious implementation.

2. How often should reports for the first IGFC be distributed, and how should the reports be distributed?

For the First Version IGFC, the Joint IOUs propose that they could share information in working group meetings, and report on a quarterly basis, which they did in the Residential Rate Reform OIR.²² Cal Advocates agrees with the Joint IOUs' approach. Ongoing updates will provide much needed insight to evaluate and monitor the roll out of First Version IGFCs in real time. Such information may prove valuable in case adjustments to implementation are required.

¹⁹ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 28:4-6.

²⁰ See Ex. Cal Advocates-05, Supplemental Opening Testimony, at 28, fn. 88, citing PG&E Advice Letter 4949-E, Pacific Gas and Electric Company's Marketing, Education & Outreach Plan in Compliance with December 17, 205 Assigned Commissioner and Administrative Law Judge's Ruling and Decision 15-07-001, November 1, 2016, at 121-122.

²¹ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 28:1-4, citing PG&E Advice Letter 4949-E, Pacific Gas and Electric Company's Marketing, Education & Outreach Plan in Compliance With December 17, 2015 Assigned Commissioner and Administrative Law Judge's Ruling and Decision 15-07-001, November 1, 2016, at 121-122.

²² Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 27.

3. Should we require an independent evaluator for the first IGFCs? If so, what should be the scope of work, criteria for selection, and budget for the independent evaluator?

An independent evaluator (IE) for first IGFCs would not provide clear benefits that would justify the expenditure of ratepayer funds. The IOUs can already provide the facts an IE would report, such as changes in volumetric rates, customer bill impacts, and customer movement between brackets. Therefore, Cal Advocates instead recommends the IOUs provide annual evaluations, with the first one provided 12 months after the first customers are enrolled on to the new fixed charges. Before the annual evaluations are finalized, the draft forms of them should be provided to the service list of the proceeding for feedback before a final evaluation is issued. This process can be refined through the working group.²³

4. Which questions should the evaluation of the first IGFCs address?

The Joint IOUs state that the First Version IGFC should cover operational metrics such as the number of customers in each bracket, fluctuations in bracket population, average bill impacts, and potentially pre-post implementation evaluation results about awareness and understanding of the new IGFC rate structure.²⁴ Cal Advocates agrees with the IOUs' evaluation plan for the first IGFCs.

Regarding the question of what information to include in the evaluation of the first IGFCs, the Joint IOUs state that in its Residential Rate Reform proceeding, the Commission considered data from periodic surveys, load and bill impacts, as well as operational and customer findings from the default pilots, which were presented in working group meetings.²⁵ The Joint IOUs also recommend that the Commission

²³ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 29:17-18.

²⁴ Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 27.

²⁵ Ex. Joint IOUs-04 Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 30. The Residential Rate Reform proceeding is R.12-06-013.

consider both data and any reports about the initial implementation of the First Version IGFC as well as from later checkpoints.²⁶

Regarding the question of long-term IGFC implementation, the Joint IOUs recommend tracking customer understanding and awareness, and operational metrics (e.g., the number of customers with missing income information and the number of appeals).²⁷ The Joint IOUs add that bill impact findings can be considered pre-post implementation (e.g., compare estimates with actual bill impacts).²⁸ Cal Advocates agrees with the Joint IOUs that estimates should be compared with actual bill impacts as soon as feasible. Load impacts are not directly measurable without a control group.²⁹

5. What implementation period should the first evaluation report consider (e.g., first 12 or 18 months of implementing the first IGFCs)?

The Joint IOUs note that the implementation period for the first evaluation report could occur shortly after implementation. This operational feedback and lessons learned should come immediately, and be follow-up on 12 to 18 months after implementation with longer term lessons about stabilization.³⁰ Cal Advocates agrees that, if a working group is put into place in the near term, the Joint IOUs could share information gleaned

²⁶Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 31.

²⁷Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 30-31.

²⁸ Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 31.

²⁹ Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 31.

³⁰ Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 30.

from the First Version IGFC implementation in that forum.³¹ The Joint IOUs should provide a similar cadence for reporting as in the Residential Rate Reform proceeding, with quarterly reports.³²

Reporting of the operational metrics identified in the section above could follow a similar model as the Residential Rate Reform OIR, where the IOUs shared information in working group meetings, and reported on a quarterly basis (Progress Reports on Residential Rate Reform).³³

Cal Advocates agrees with these stated reporting periods.

C. What are the estimated implementation costs of the first version of IGFCs, and how should these costs be tracked and recovered?

1. What are the estimated costs of modifying each IOU's billing systems for the first IGFCs if the Commission authorizes three tiers for IGFCs?

Cal Advocates' opening brief does not have input in response to this question.

2. Other than billing system changes, and ME&O, are there other estimated costs for implementing the first IGFCs? Provide a breakdown of implementation costs by category.

Cal Advocates' opening brief does not have input in response to this question.

3. How should the implementation costs of the first IGFCs be recovered?

Cal Advocates recommends tracking implementation costs through a memorandum account. This approach is reasonable given the evolving nature of this proceeding with the large array of IGFC proposals. The Commission should establish a

³¹ Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 30.

³² Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 30.

³³ Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 27.

cost cap based upon justified implementation cost estimates. The commission should establish a memorandum account with a hard cost cap, with utilities seeking cost recovery for the memorandum account through an application that would allow the Commission and parties to complete a reasonableness review. Such costs should then be collected from customers through PPP revenues given the underlying equity and policy goals inherent in an IGFC.

D. What timeline and procedural pathway should the Commission adopt for implementing the first version of IGFCs and developing and adopting the second version of IGFCs?

1. Should the Commission provide enough direction for the first IGFCs in the upcoming Track A decision for utilities to file advice letters to implement the first IGFCs rather than file rate design window applications?

Yes. The Commission's Track A decision should provide enough direction for IOUs to file Tier 2 advice letters as soon as possible in order to implement the first IGFCs.³⁴ Specifically, the Commission's decision should identify: 1) the costs the Commission authorizes for recovery in the IGFC; 2) how large the fixed charge will be; 3) fixed charge differentials, which means the differences in fixed charges among each income brackets; 4) the number of income brackets;³⁵ 5) design of the income brackets; 6) calculation for the IGFCs; and 7) the income verification process.³⁶ The Commission should require the IOUs to include bill impacts to low-income customers in their Advice Letters. The Commission should also provide guidance for addressing IGFCs for default and operational rates, so that customers do not have inadvertent incentives to move to rates without IGFCs.³⁷

The Commission should not have IOUs file additional rate design window applications to implement First Version IGFCs because such applications will consume

³⁴ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 2:5-7, 12-15.

³⁵ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 2:9-10.

³⁶ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 2:9-10.

³⁷ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 2:10-12.

resources and time, only to duplicate the necessary record already established in this proceeding regarding this issue.³⁸ Instead, if the Commission required the IOUs to follow the advice letter process provided under General Order 96-B, IOUs could make the necessary changes to their billing systems, and implement IGFCs faster than they could through an application.³⁹ The Decision should include sufficient detail on the calculation of the IGFC to allow the IOUs to implement their First Version IGFCs with a Tier 2 advice letter.⁴⁰

The Decision should also determine the categories of costs that are eligible for consideration in IGFCs to avoid re-litigating the issue. This determination would be on the costs that could be recovered through an IGFC. The Commission would still have flexibility to decide the costs that should be recovered through an IGFC. The Commission should adopt marginal customer access cost, non-marginal distribution costs, public purpose related charges, and wildfire-related charges as eligible for recovery through an IGFC.⁴¹

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³⁸ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 2:8-9.

³⁹ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 2:12-15.

⁴⁰ General Order 96-B Section 5.2 Matters Appropriate to Tier 2 (Effective After Staff Approval) Matters appropriate to Tier 2 are:

(1) A change in a rate or charge pursuant to an index or formula that the Commission has approved for use in an advice letter by the Utility submitting the advice letter but that the Utility has not used previously for this purpose. This Industry Rule does not cover a change pursuant to a methodology, such as a methodology approved by the Commission for use by a Utility for performance-based ratemaking.

(2) A tariff change that is consistent with authority the Commission previously has granted to the Utility submitting the advice letter, such as a rate change within a price floor and ceiling previously approved by the Commission for that Utility.

⁴¹ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 9:6-7.

2. If the Commission authorizes utilities to file advice letters to implement the first IGFCs after the upcoming Track A decision, when should the advice letters be filed? When should the first IGFCs be applied to customer bills?

Based upon the scheduled mandate from Assembly Bill 205,⁴² the Commission should issue a Proposed Decision in the first quarter of 2024, and with a Commission vote and a Final Decision by second quarter of 2024.⁴³ Based upon this statutorily mandated deadline, the Commission should require IOUs to file a Tier 2 Advice Letter by the third quarter of 2024, which explains in detail how they will each implement their First Version IGFCs.⁴⁴

The IOUs anticipate the First Version IGFC could be implemented between 12 and 36 months (varying by utility) after the Commission issues its Final Track A Decision. PG&E has more complex implementation issues, pushing implementation for PG&E later than SCE and SDG&E.⁴⁵ Cal Advocates understands this to mean that, after the Commission’s Final Decision, SCE and SDG&E will need 12 months to implement their First Version IGFCs, and PG&E will need 36 months. The Commission should require a working group convene even before a Decision is issued to provide sufficient time to develop a ME&O proposal by third quarter of 2024. Parties should comment on the ME&O proposal by fourth quarter of 2024 and the Commission should issue a Final Decision on ME&O by the end of 2024. The IOUs should file a Tier 2 advice letter on ME&O within 60 days of the ME&O decision and the First Version IGFC should apply to customer bills for SCE and SDG&E 12 months after the Commission Decision on IGFCs.

⁴² Cal. Pub. Util. Code Section 739.9(e)(1). [“The commission shall, no later than July 1, 2024, authorize a fixed charge for default residential rates.”]

⁴³Ex. Cal Advocates-05, Supplemental Opening Testimony, at 3, Timeline Table.

⁴⁴ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 3, Timeline Table.

⁴⁵ Ex. Joint IOUs-04, Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals, September 8, 2023, at 10:8-12.

3. Should the Commission authorize a working group to develop a proposal for income verification and tiers for the second version of IGFCs? If so, (i) what should be the scope of work for the working group, (ii) how much time should the working group be given to develop a proposal?

To date, there is a wide range of proposals for income verification and tiers for the second version of IGFCs. Given the range of proposals, it is unlikely that a working group could reach a consensus on the issue of the attributes of tiers, such as number, range, whether to apply the California Climate Credit (CCC) to them, and whether they should be based on customer or household income. Such lack of consensus may simply lead parties to repeat of income bracket proposals parties already proposed in testimony.

The Commission should create a working group that simply focuses on the technical details of income verification alternatives, and provides the facts that support each alternative. Parties could then decide which income verification alternative they support to lead to a Commission decision. Such a working group could consider input from subject matter experts related to such proposals. Cal Advocates proposes that working group members and Energy Division staff hear from Equifax’s representatives about “TheWorkNumber”, and its abilities to effectively do income verification. Additionally, experts that utilize confidential income data, such as the California Policy Lab, could present on how customers could be assigned to brackets while keeping specific income information confidential from the IOUs.

The Commission should also immediately start the process of looking for a Third Party Administrator (TPA) to handle the income data for the second version of IGFCs. The TPA should be hired before the Commission determines the specific design of income brackets, or the exact sources on the income data that will be utilized. The TPA should be an expert in handling confidential income data and have the knowledge and flexibility to work with different income bracket designs and data sources. The contract should ensure that the TPA is prepared to work with multiple data sources so that it can

develop its systems and processes to account for the issue.⁴⁶ The LifeLine TPA, Maximus is the name of the TPA for a program known as Lifeline. Maximus hosts a monthly consumer advocate meeting to discuss program goals and solicit feedback. Cal Advocates supports a TPA for IGFC that models LifeLine and holds monthly or quarterly meetings.⁴⁷ As with the Lifeline TPA, the Commission should establish a working group to discuss IGFC implementation issues and recommendations for refinement in the future.⁴⁸

4. Should the Commission authorize hiring a consultant to advise Energy Division staff or a working group on income verification for the second version of IGFCs? If so, what should be the scope of work and budget for the consultant? What should be the criteria for selecting a consultant (e.g., experience as a third-party administrator of income verification processes)? What should be the proportional cost share of each IOU for the consultant?

The Commission should not authorize funding for a third-party contractor to develop income verification proposals for future versions of IGFCs. Parties have already provided detailed proposals for IGFCs and would participate in future proceedings for changes to IGFCs. A TPA should be flexible enough to work with multiple data sources for income verification⁴⁹ and work with parties. The LifeLine TPA, Maximus, hosts a monthly consumer advocate meeting to discuss program goals and solicit feedback. Cal Advocates supports a TPA for IGFC that models LifeLine and holds monthly or quarterly meetings with the working group.⁵⁰

There is no evidence that shows a separate third-party contractor could propose something different than parties have provided regarding income verification. Hiring a

⁴⁶ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 22:18 – 23: 2.

⁴⁷ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 28:20-21.

⁴⁸ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 28:18-21.

⁴⁹ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 22:18-24.

⁵⁰ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 28:19-21.

contractor would add unnecessary expense, would require time to contract and would not necessarily provide commensurate benefits.

As an alternative to hiring a consultant, as discussed above, the Commission could have a working group in which non-party entities with expertise in income verification present, such as Equifax and the California Policy Lab.

If there is a consultant, cost should be based on annual sales which roughly tracks with the allocation of costs associated with the Public Tool and Consulting in this proceeding.⁵¹

5. When should the Commission consider the design of the second version of IGFCs? Should the timing depend on reviewing a certain number of months of implementation data for the first IGFCs, and/or consideration of a working group proposal for income verification and tiers for the second version of IGFCs?

The Commission should consider the design of the second version of the IGFCs as expeditiously as possible. However, if the Commission approves an income verification working group, the schedule for the second version's design would need to include time to consider the work product of that working group.

The First Version income tiers would not inform or provide data needed to design the second version. Since the first version proposal only relies on existing CARE/FERA processes, it cannot provide insights on how to approach bifurcating the non-CARE/FERA bracket in to moderate income and high-income brackets.

The Commission should immediately start work on the second version of IGFCs, including additional tiers, while implementing the First Version.

⁵¹ R.22-07-005, Administrative Law Judge's Ruling Providing Guidance for Phase 1 Track A Proposals and Requesting Comments on a Consulting Services Proposal, January 17, 2023, Attachment 2, R.22-07-005, Phase 1 Track A: Income Graduated Fixed Charge Guidance Memo, at 14. "Staff supports the IOUs' proposal to share the costs associated with this work using a split of 40% PG&E, 40% SCE, and 20% SDG&E." The attachment did not specify how such ratios were developed but these ratios roughly track the share of total sales of each of the three large IOUs. If costs are shared with the small multi jurisdictional utilities, only the California-relates sales should be factored.

6. Should the timeline or procedural pathway for SMJUs' IGFCs differ from the implementation pathway for large IOUs? If so, please explain why it should differ and specify how it should differ.

Cal Advocates answers this question in two separate parts. First, should Cal Advocates and SJMUs reach a settlement on implementation for a SMJU IGFC, the Commission should give that proposal substantial weight in considering its approval. If a settlement is not presented for Commission consideration, the Commission should apply unique timelines and procedural pathways for each of the SMJUs, as it considers second versions of the income graduated fixed charges to apply to the large IOUs.

The Commission has not determined the timeline and procedural pathway for the large IOUs yet. The timeline and procedural pathway for the SMJUs' IGFCs can be considered as the Commission considers next versions for the large IOUs. However, the Commission can consider applying a unique timeline and procedural pathway to each of the SMJUs once it determines the framework of the next version based on the circumstance of each SMJU.

II. NEW PROPOSAL FOR A FIRST VERSION OF INCOME-GRADUATED FIXED CHARGES THAT RELY ON EXISTING CARE AND FERA INCOME VERIFICATION PROCESSES, INCLUDING PREFERRED TIER LEVELS AND FULL RESULTS FROM THE E3 TOOL.⁵²

On August 24, 2023, the ALJ ruled that “Parties may include new proposals for a First Version of income-graduated fixed charges that rely on existing CARE and FERA income verification processes in opening briefs...Parties who include new proposals in opening briefs may propose their preferred tier levels and shall include full results from the E3 tool.”⁵³ In compliance with this Ruling, Cal Advocates’ new proposal will lay the proper groundwork for the First Version of IGFCs. By relying on existing CARE/FERA income verification processes, this proposal may be implemented quickly.

⁵² This subheading is authorized by the ALJs Email Ruling, August 24, 2023.

⁵³ ALJ Ruling, August 24, 2023.

For the First Version of IGFCs, the Commission should adopt the IOUs' proposal for a very low-income bracket (<100% FPL)⁵⁴ with the lowest IGFC and a low income bracket with all other CARE and FERA customers with a higher IGFC.⁵⁵ A third income bracket covering all remaining customers would have the highest IGFC.⁵⁶

The Commission should adopt average fixed charge amounts of \$23.25, \$24.52 and \$25.62 for PG&E, SCE and SDG&E respectively. These amounts are large enough to provide a beneficial volumetric rate reduction which will provide measurable benefits for electrification. Cal Advocates estimates that this proposal would reduce volumetric rates by roughly 19% for PG&E, 15% for SCE and 11% for SDG&E.⁵⁷

These fixed charges are designed to collect the same marginal customer access costs, PPP, and wildfire charges consistent with Cal Advocates' original proposal.⁵⁸ For the First Version IGFC, Cal Advocates recommends recovering just 15% of non-marginal distribution costs. Cal Advocates proposes that total revenues collected by fixed charges fluctuate in tandem with the underlying revenue requirements for each of the aforementioned cost categories. For instance, if the underlying non-marginal distribution revenues increase, the average fixed charge should increase to maintain the recommended recovery rate of 15%. This will ensure that volumetric rates do not increase in a manner that erodes the volumetric rate reduction benefits provided by the fixed charge.

Cal Advocates' original proposal included a higher percentage of non-marginal distribution costs based on income brackets separating low, moderate and high income

⁵⁴ FPL stands for "Federal Poverty Level".

⁵⁵ This would mean CARE eligibility allows for customers at <200% FPL and FERA eligibility allows for customers at <250% FPL.

⁵⁶ FERA customers to be levied a same fixed charge as CARE equivalent.

⁵⁷ See E3 Printable Results attached herein.

⁵⁸ Ex. Cal Advocates-05, Supplemental Opening Testimony, at 9:5-7.

customers.⁵⁹ Adoption of a high income bracket with a higher IGFC would have allowed for adoption a lower IGFC for a moderate income bracket with minimal bill impacts for moderate income customers. For this First Version proposal, the third income bracket would consist of all non-CARE/FERA customers, including moderate and high income customers. Cal Advocates selected this smaller allocation of non-marginal distribution costs to limit the size of the average fixed charge. This approach will alleviate bill pressure on moderate income non-CARE/FERA customers. Without a higher-income bracket, increases to the average fixed charge will necessitate increasing fixed charges on such customers which will further lead to bill increases all else being equal.

These average fixed charge levels are comparable to those customers in other service territories pay in California. For example, Sacramento Municipal Utility District (SMUD) customers currently pay a fixed charge of \$23.50.⁶⁰ Cal Advocates' proposed averages would recover 15%-16%⁶¹ of the IOUs' *current* revenue requirement which is comparable to SMUD's recovery of 23% of its revenue requirement through its fixed charge.⁶² The following table compares Cal Advocates' original proposal to the new First Version proposal.

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⁵⁹ Cal Advocates' original proposal included 23%, 32%, and 45% of non-marginal distribution costs for SCE, PG&E, and SDG&E respectively. Ex. Cal Advocates-01-E, Errata on Prepared Testimony on Rulemaking to Advance Demand Flexibility Through Electric Rates – Income Graduated Fixed Charge Rate Design (Clean Version), Appendix A.I, Fixed Charge Tool Inputs and Outputs, at 2-4.

⁶⁰ Ex. NRDC-TURN-01, Opening Testimony of Mohit Chhabra and Sylvie Ashford, Sponsored by the Natural Resources Defense Council and the Utility Reform Network Addressing Options for an Income-Graduated Fixed Charge, at 4, Appendix C.

⁶¹ See Cal Advocates' E3 Printable results attached herein.

⁶² Ex. NRDC-TURN-01, Opening Testimony of Mohit Chhabra and Sylvie Ashford, Sponsored by the Natural Resources Defense Council and the Utility Reform Network Addressing Options for an Income-Graduated Fixed Charge, at 4, Appendix C.

**Table 1:
Comparison of Cal Advocates' Original IGFC
to Cal Advocates' "First Version" IGFC**

	Original Proposed IGFC					Proposed First Version IGFC				
CARE	Bracket	Income Range	PG&E	SCE	SDG&E	Bracket	Income Range	PG&E	SCE	SDG&E
CARE		< \$25,000*	\$10.20	\$10.83	\$13.70	1	< 100% FPL ⁶³	\$4.00	\$4.00	\$4.00
	1	< \$25,000 - \$50,000*	\$10.20	\$10.83	\$13.70	2	Rest of CARE and FERA ⁶⁴	\$7.00	\$7.00	\$7.00
	2	\$50,000 - \$100,000	\$14.27	\$15.17	\$19.18					
	3	> \$100,000	\$16.41	\$17.44	\$22.06					
Non-CARE	1	< \$50,000*	\$22.79	\$21.82	\$26.70	3	Non- CARE/F ERA	\$29.96	\$31.15	\$32.15
	2	\$50,000 - \$100,000	\$31.91	\$30.55	\$36.42					
	3	> \$100,000	\$36.69	\$35.14	\$41.88					
		Average Fixed Charge	\$28.86	\$27.78	\$34.64		Average Fixed Charge	\$23.25	\$24.52	\$25.62

*Excludes CCC offset. First Version Proposal does not feature a CCC offset for any bracket.

⁶³ Approximately <\$25,000.

⁶⁴ CARE eligibility allows for customers at <200% FPL and FERA eligibility allows for customers at <250% FPL.

The fixed charge amounts for Brackets 1 and 2 of the First Version IGFC are determined such that they are progressive⁶⁵ and guarantee that the average CARE and FERA customer in every climate zone will see bill savings, consistent with AB 205’s requirement that “low income ratepayers in each baseline territory would realize lower average monthly bills without making changes to usage.” Cal Advocates proposes Bracket 3’s fixed charge to collect the remaining fixed costs not collected from Brackets 1 and 2.

In compliance with the ALJ’s August 24, 2023 Ruling, Tables 2-4 below depict estimated bill impacts using the E3 tool. All CARE and FERA customers will see bill decreases while all other customers see increases or decreases depending on climate zone.⁶⁶

Finally, unlike Cal Advocates’ original IGFC proposal, the First Version IGFC would not leverage the CCC to offset fixed charges for low-income customers. There is no need for the offset since this proposal consists of a low \$4 Bracket 1 fixed charge. It would not be worth the administrative effort to apply the CCC differently to customers to provide a relatively minor benefit. As shown in the bill impacts tables below, Bracket 1 customers (i.e., CARE<\$25,000) would see average bill savings ranging between \$8-\$10/month without the CCC offset.

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⁶⁵ Progressive features increasingly higher fixed charges levied on customers with higher incomes given household size.

⁶⁶ The E3 Tool models bill impacts for FERA customers using Bracket 3 fixed charges. To better illustrate FERA bill impacts, the Tool’s results are altered to reflect the lower fixed charge FERA customers would receive under this proposal. This FERA alteration is reflected in the bill impact tables provided.

**Table 2:
PG&E Bill Impacts from First Version Proposal⁶²**

Income Bracket	Bill Discount		Customer Average Bill Impact (\$/mo)										
			PG&E	P	Q	R	S	T	V	W	X	Y	Z
\$0 - \$25,000	None	1	\$ 5.81	\$(6.33)	\$(3.39)	\$(6.21)	\$(3.73)	\$11.22	\$ 1.88	\$(4.34)	\$ 3.82	\$ 3.19	\$ 14.48
\$25,000 - \$50,000	None	2	\$ 2.74	\$(6.12)	\$(3.38)	\$(6.28)	\$(3.59)	\$11.27	\$ 1.79	\$(4.54)	\$ 3.81	\$ 3.19	\$ 14.50
\$50,000 - \$75,000	None	3	\$ 2.36	\$(5.93)	\$(3.29)	\$(5.62)	\$(3.11)	\$11.33	\$ 1.80	\$(3.69)	\$ 3.91	\$ 3.19	\$ 14.46
\$75,000 - \$100,000	None	4	\$ 2.94	\$(5.58)	\$(3.31)	\$(4.76)	\$(2.42)	\$11.37	\$ 1.88	\$(2.47)	\$ 3.98	\$ 3.19	\$ 14.48
\$100,000 - \$150,000	None	5	\$ 3.69	\$(5.18)	\$(3.08)	\$(3.75)	\$(1.64)	\$11.42	\$ 1.96	\$(1.01)	\$ 4.12	\$ 3.19	\$ 14.50
\$150,000 - \$200,000	None	6	\$ 4.64	\$(4.40)	\$(2.91)	\$(2.60)	\$(0.66)	\$11.46	\$ 2.06	\$ 0.63	\$ 4.30	\$ 3.19	\$ 14.44
\$200,000+	None	7	\$ 5.95	\$(3.41)	\$(2.34)	\$(0.85)	\$ 0.75	\$11.53	\$ 2.09	\$ 2.55	\$ 4.82	\$ 3.18	\$ 14.45
\$0 - \$25,000	CARE	1	\$(8.12)	\$(13.25)	\$(10.56)	\$(11.25)	\$(9.99)	\$(3.83)	\$(6.23)	\$(10.87)	\$(6.24)	\$(11.44)	\$(7.86)
\$25,000 - \$50,000	CARE	2	\$(5.38)	\$(10.19)	\$(7.55)	\$(8.01)	\$(6.83)	\$(0.80)	\$(3.24)	\$(7.52)	\$(3.19)	\$(8.44)	\$(4.94)
\$50,000 - \$75,000	CARE	3	\$(5.01)	\$(10.10)	\$(7.34)	\$(7.77)	\$(6.71)	\$(0.78)	\$(3.17)	\$(7.12)	\$(3.17)	\$(8.43)	\$(4.99)
\$75,000 - \$100,000	CARE	4	\$(4.87)	\$(10.08)	\$(6.93)	\$(7.67)	\$(6.53)	\$(0.76)	\$(3.10)	\$(6.75)	\$(3.17)	\$(8.43)	\$(5.01)
\$100,000 - \$150,000	CARE	5	\$(4.66)	\$(10.02)	\$(7.48)	\$(7.38)	\$(6.37)	\$(0.75)	\$(3.21)	\$(6.53)	\$(3.10)	\$(8.43)	\$(5.05)
\$150,000 - \$200,000	CARE	6	\$(4.28)	\$(9.90)	\$(7.65)	\$(7.20)	\$(6.22)	\$(0.76)	\$(3.23)	\$(5.99)	\$(3.09)	\$(8.43)	\$(4.90)
\$200,000+	CARE	7	\$(3.71)	\$(9.54)	\$(7.65)	\$(6.85)	\$(5.97)	\$(0.75)	\$(3.10)	\$(5.76)	\$(3.03)	\$(8.42)	\$(7.36)
\$0 - \$25,000	FERA	1	\$(22.65)	\$(33.88)	\$(28.22)	\$(29.31)	\$(26.99)	\$(14.51)	\$(19.38)	\$(28.49)	\$(19.39)	\$(30.38)	\$(22.93)
\$25,000 - \$50,000	FERA	2	\$(23.00)	\$(33.78)	\$(28.20)	\$(28.57)	\$(26.56)	\$(14.45)	\$(19.40)	\$(27.48)	\$(19.27)	\$(30.38)	\$(23.49)
\$50,000 - \$75,000	FERA	3	\$(22.33)	\$(33.62)	\$(27.68)	\$(27.86)	\$(26.24)	\$(14.41)	\$(19.26)	\$(26.41)	\$(19.21)	\$(30.39)	\$(23.71)
\$75,000 - \$100,000	FERA	4	\$(22.11)	\$(33.59)	\$(26.71)	\$(27.60)	\$(25.81)	\$(14.36)	\$(19.11)	\$(25.52)	\$(19.22)	\$(30.39)	\$(23.83)
\$100,000 - \$150,000	FERA	5	\$(21.78)	\$(33.48)	\$(28.02)	\$(26.86)	\$(25.41)	\$(14.34)	\$(19.34)	\$(25.02)	\$(19.07)	\$(30.39)	\$(23.99)
\$150,000 - \$200,000	FERA	6	\$(21.13)	\$(33.29)	\$(28.45)	\$(26.44)	\$(25.08)	\$(14.35)	\$(19.37)	\$(23.91)	\$(19.04)	\$(30.40)	\$(23.22)
\$200,000+	FERA	7	\$(20.20)	\$(32.68)	\$(28.45)	\$(25.67)	\$(24.52)	\$(14.34)	\$(19.10)	\$(23.49)	\$(18.91)	\$(30.40)	\$(26.31)

⁶² In the bill impact Tables 2, 3, and 4, customers are grouped by climate zone (represented as each letter column) and by income level (represented as each income septile, labeled 1-7). The bill impact tables are formatted in the tool by default to represent bill changes on a gradient scale from green to red, from bill savings (shown in parenthesis) to bill increases accordingly. All three bill impact Tables are produced using the E3 Tool.

**Table 3:
SCE Bill Impacts from First Version Proposal**

Income Bracket	Bill Discount		Customer Average Bill Impact (\$/mo)									
			SCE	5	6	8	9	10	13	14	15	16
\$0 - \$25,000	None	1	\$ 1.89	\$(0.14)	\$ 7.19	\$ 5.53	\$ (0.66)	\$ (1.78)	\$ (7.63)	\$ (5.60)	\$(10.93)	\$ 3.99
\$25,000 - \$50,000	None	2	\$ 0.83	\$(0.14)	\$ 7.22	\$ 5.44	\$ (1.00)	\$ (2.69)	\$ (7.15)	\$ (5.29)	\$(11.74)	\$ 4.04
\$50,000 - \$75,000	None	3	\$ 1.02	\$(0.14)	\$ 7.26	\$ 5.44	\$ (1.03)	\$ (2.58)	\$ (6.29)	\$ (4.92)	\$(11.20)	\$ 4.09
\$75,000 - \$100,000	None	4	\$ 1.33	\$(0.14)	\$ 7.28	\$ 5.50	\$ (0.90)	\$ (2.19)	\$ (5.64)	\$ (4.36)	\$(10.70)	\$ 4.26
\$100,00 - \$150,000	None	5	\$ 1.82	\$(0.14)	\$ 7.35	\$ 5.61	\$ (0.73)	\$ (1.50)	\$ (4.81)	\$ (3.77)	\$(10.25)	\$ 4.42
\$150,000 - \$200,000	None	6	\$ 2.42	\$(0.14)	\$ 7.42	\$ 5.77	\$ (0.41)	\$ (0.84)	\$ (4.21)	\$ (3.12)	\$(9.72)	\$ 4.61
\$200,000+	None	7	\$ 3.45	\$(0.14)	\$ 7.58	\$ 6.12	\$ 0.06	\$ (0.02)	\$ (2.96)	\$ (2.30)	\$(8.80)	\$ 4.74
\$0 - \$25,000	CARE	1	\$ (9.55)	N/A	\$ (5.20)	\$ (6.46)	\$ (8.55)	\$ (11.92)	\$(13.30)	\$(13.51)	\$(15.19)	\$(10.38)
\$25,000 - \$50,000	CARE	2	\$ (6.38)	N/A	\$ (2.19)	\$ (3.45)	\$ (5.54)	\$ (8.84)	\$(10.11)	\$(10.31)	\$(11.90)	\$ (7.31)
\$50,000 - \$75,000	CARE	3	\$ (6.29)	N/A	\$ (2.18)	\$ (3.44)	\$ (5.53)	\$ (8.72)	\$ (9.96)	\$(10.20)	\$(11.75)	\$ (7.32)
\$75,000 - \$100,000	CARE	4	\$ (6.28)	N/A	\$ (2.18)	\$ (3.44)	\$ (5.52)	\$ (8.64)	\$ (9.80)	\$(10.18)	\$(11.61)	\$ (7.32)
\$100,00 - \$150,000	CARE	5	\$ (6.13)	N/A	\$ (2.16)	\$ (3.43)	\$ (5.51)	\$ (8.51)	\$ (9.79)	\$ (9.96)	\$(11.51)	\$ (7.21)
\$150,000 - \$200,000	CARE	6	\$ (5.88)	N/A	\$ (2.15)	\$ (3.40)	\$ (5.48)	\$ (8.28)	\$ (9.61)	\$ (9.73)	\$(11.28)	\$ (7.07)
\$200,000+	CARE	7	\$ (5.51)	N/A	\$ (2.15)	\$ (3.37)	\$ (5.45)	\$ (8.10)	\$ (9.34)	\$ (9.57)	\$(10.84)	\$ (6.91)
\$0 - \$25,000	FERA	1	\$(22.40)	N/A	\$(15.12)	\$(17.28)	\$(21.01)	\$(26.58)	\$(28.75)	\$(29.28)	\$(32.35)	\$(24.34)
\$25,000 - \$50,000	FERA	2	\$(22.22)	N/A	\$(15.10)	\$(17.26)	\$(20.99)	\$(26.39)	\$(28.22)	\$(28.83)	\$(31.62)	\$(24.20)
\$50,000 - \$75,000	FERA	3	\$(22.11)	N/A	\$(15.09)	\$(17.24)	\$(20.97)	\$(26.12)	\$(27.86)	\$(28.59)	\$(31.27)	\$(24.22)
\$75,000 - \$100,000	FERA	4	\$(22.10)	N/A	\$(15.08)	\$(17.23)	\$(20.96)	\$(25.96)	\$(27.48)	\$(28.54)	\$(30.93)	\$(24.22)
\$100,00 - \$150,000	FERA	5	\$(21.88)	N/A	\$(15.06)	\$(17.20)	\$(20.95)	\$(25.67)	\$(27.44)	\$(28.08)	\$(30.72)	\$(24.01)
\$150,000 - \$200,000	FERA	6	\$(21.47)	N/A	\$(15.04)	\$(17.16)	\$(20.90)	\$(25.20)	\$(27.04)	\$(27.63)	\$(30.20)	\$(23.76)
\$200,000+	FERA	7	\$(20.87)	N/A	\$(15.03)	\$(17.10)	\$(20.85)	\$(24.86)	\$(26.48)	\$(27.31)	\$(29.30)	\$(23.48)

**Table 4:
SDG&E Bill Impacts from First Version Proposal**

Income Bracket	Bill Discount		Customer Average Bill Impact (\$/mo)				
			SDG&E	Inland	Coastal	Desert	Mountain
\$0 - \$25,000	None	1	\$ 4.59	\$ 2.80	\$ 5.47	\$ 1.77	\$ (9.02)
\$25,000 - \$50,000	None	2	\$ 4.44	\$ 2.45	\$ 5.47	\$ 1.56	\$ (7.98)
\$50,000 - \$75,000	None	3	\$ 4.09	\$ 2.42	\$ 5.50	\$ 2.18	\$ (7.67)
\$75,000 - \$100,000	None	4	\$ 4.11	\$ 2.58	\$ 5.55	\$ 3.00	\$ (7.21)
\$100,00 - \$150,000	None	5	\$ 4.44	\$ 3.14	\$ 5.72	\$ 2.47	\$ (6.04)
\$150,000 - \$200,000	None	6	\$ 4.99	\$ 3.97	\$ 5.91	\$ 6.73	\$ (4.42)
\$200,000+	None	7	\$ 5.94	\$ 5.11	\$ 6.46	\$ 2.26	\$ (2.39)
\$0 - \$25,000	CARE	1	\$ (8.71)	\$ (10.19)	\$ (7.00)	\$ (22.31)	\$ (24.49)
\$25,000 - \$50,000	CARE	2	\$ (5.77)	\$ (7.16)	\$ (4.00)	\$ (19.94)	\$ (21.22)
\$50,000 - \$75,000	CARE	3	\$ (5.68)	\$ (7.12)	\$ (3.98)	N/A	\$ (21.26)
\$75,000 - \$100,000	CARE	4	\$ (5.39)	\$ (7.09)	\$ (3.91)	N/A	\$ (21.59)
\$100,00 - \$150,000	CARE	5	\$ (5.20)	\$ (7.13)	\$ (3.94)	N/A	N/A
\$150,000 - \$200,000	CARE	6	\$ (3.64)	N/A	\$ (3.64)	N/A	N/A
\$200,000+	CARE	7	N/A	N/A	N/A	N/A	N/A
\$0 - \$25,000	FERA	1	\$ (20.63)	\$ (22.90)	\$ (17.63)	\$ (41.39)	\$ (46.46)
\$25,000 - \$50,000	FERA	2	\$ (20.74)	\$ (22.85)	\$ (17.63)	\$ (42.70)	\$ (45.84)
\$50,000 - \$75,000	FERA	3	\$ (20.62)	\$ (22.78)	\$ (17.61)	N/A	\$ (45.94)
\$75,000 - \$100,000	FERA	4	\$ (20.15)	\$ (22.74)	\$ (17.52)	N/A	\$ (46.67)
\$100,00 - \$150,000	FERA	5	\$ (19.79)	\$ (22.81)	\$ (17.56)	N/A	N/A
\$150,000 - \$200,000	FERA	6	\$ (17.20)	N/A	\$ (17.20)	N/A	N/A
\$200,000+	FERA	7	N/A	N/A	N/A	N/A	N/A

Cal Advocates’ proposal appropriately leverages existing CARE/FERA processes which will facilitate expedient implementation. The adoption of “very low income” and “low-income” groupings will provide the groundwork for expansion of the number of income brackets in future versions of IGFC. The proposal also features a moderately-sized fixed charge which will provide bill reductions to low-income customers without unduly burdening moderate- income customers and will provide sufficient volumetric rate reductions to improve electrification incentives.

The Commission should similarly adopt the first version IGFC proposal for the SMJU’s illustrated in *Table 5*. This proposal adopts similar income brackets as those recommended for the large IOUs’ first version IGFC since they would rely on existing CARE processes. The SMJU’s do not participate in the FERA program. Because Cal Advocates’ originally proposed average fixed charges⁶⁸ for the SMJUs were already low, Cal Advocates does not propose further reductions for their first version IGFCs. Finally, the fixed charges for CARE<100% FPL and CARE>100% FPL are fixed at \$4 and \$7 respectively, which is similar to Cal Advocates’ large IOU first version IGFC proposal.

**Table 5:
Cal Advocates’ Proposed First Version IGFC for the SMJUs⁶⁹**

Bracket	PacifiCorp (Single Family)	PacifiCorp (Multi Family)	Liberty	BVES
CARE <100% FPL	\$4.00	\$3.32	\$4.00	\$4.00
CARE >100% FPL	\$7.00	\$5.82	\$7.00	\$7.00
Non-CARE	\$27.52	\$22.86	\$24.32	\$17.01
<i>Proposed First Version Average</i>	\$20.08		\$22.91	\$16.22
Current Average	\$8.13		\$10.00	\$11.68
SMJU Proposed Average	\$62.83		\$35.00	\$105.65

⁶⁸ See Exhibit Cal Advocates-03 at 1-12 for breakdown of proposed average fixed charges for the SMJU.

⁶⁹ Cal Advocates did not perform bill impacts with the original proposal because the E3 tool is not capable of doing that. Therefore, Cal Advocates’ proposal is based off of the IOU bill impact results using the E3 tool.

III. CONCLUSION

Cal Advocates appreciates the opportunity to answer the ALJs questions. For the reasons shown in Section II, the Commission should adopt Cal Advocates' First Version IGFCs, as outlined above.

Respectfully Submitted,

/s/ Darryl Gruen

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October 6, 2023

ATTACHMENT A

Fixed Charge Tool Outputs - Cover Sheet

Purpose:

This section of the tool is formatted to be easily printed or saved as a PDF and filed as a part of testimony.

Instructions:

This worksheet automatically draws values from the rest of the tool.

This worksheet displays both rate design details and bill impacts for all three IOUs.

Please run the macro (button above) to re-generate model results using current inputs to ensure that the rate design details and bill impacts are aligned.

This macro can also be run from the Rate Design Dashboard worksheet. Please see the Rate Design Dashboard worksheet for further details.

How to Save as PDF:

Click "File", then "Print", then select "Microsoft Print to PDF". Click the large "Print" button to choose a file location and name.

How to Print:

Click "File", then "Print", then select your choice of printer.

Table of Contents

Section	Sub-Section	Page
Cover	--	1
Revenue Requirement Allocations	PG&E	2
	SDG&E	3
	SCE	4
Rate Design Inputs	--	5
Revenue Requirement Components	--	6
New Rates	--	7
	--	8
	--	9
Bill Impacts	PG&E	10
	SDG&E	11
	SCE	12



Energy+Environmental Economics

Energy and Environmental Economics, Inc.
44 Montgomery Street, Suite 1500
San Francisco, CA 94104
Phone: 415-391-5100

Model Release Date: April 13, 2023

Revenue Requirement Allocations

PG&E

Cost Category	Cost Component (See "Glossary" tab for descriptions)	Residential Revenue Requirement	CARE-Exempt	Bundled Generation	Percent to Include in Customer Charge	Percent to Include in Demand Charge	Percent to Include in Volumetric Charge
		\$	T/F	T/F	%	%	%
Generation	PCIA	\$ 183,408,243	FALSE	FALSE	0.00%	0.00%	100.00%
Generation	Marginal Energy Cost	\$ 538,263,216	FALSE	TRUE	0.00%	0.00%	100.00%
Generation	Marginal Generation Capacity Cost	\$ 218,481,550	FALSE	TRUE	0.00%	0.00%	100.00%
Generation	Non-Marginal Generation	\$ 865,996,766	FALSE	TRUE	0.00%	0.00%	100.00%
Distribution	Marginal Customer Access	\$ 454,792,861	FALSE	FALSE	100.00%	0.00%	0.00%
Distribution	Marginal Distribution Capacity Cost - Primary	\$ 439,382,040	FALSE	FALSE	0.00%	0.00%	100.00%
Distribution	Marginal Distribution Capacity Cost - New Business	\$ 476,043,853	FALSE	FALSE	0.00%	0.00%	100.00%
Distribution	Marginal Distribution Capacity Cost - Secondary	\$ 29,945,145	FALSE	FALSE	0.00%	0.00%	100.00%
Distribution	Non-Marginal Distribution	\$ 1,833,578,625	FALSE	FALSE	15.00%	0.00%	85.00%
Transmission	Transmission	\$ 1,447,654,612	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Public Purpose Programs - SGIP	\$ 58,854,252	TRUE	FALSE	100.00%	0.00%	0.00%
Line Items	Wildfire Fund Charge	\$ 63,120,120	TRUE	FALSE	100.00%	0.00%	0.00%
Line Items	Wildfire Hardening Charge	\$ 68,921,008	TRUE	FALSE	100.00%	0.00%	0.00%
Line Items	Recovery Bond Charge	\$ 215,256,658	TRUE	FALSE	0.00%	0.00%	100.00%
Line Items	Recovery Bond Credit	\$ (215,256,658)	TRUE	FALSE	0.00%	0.00%	100.00%
Line Items	Public Purpose Programs - Not CARE Exempt	\$ 230,732,710	FALSE	FALSE	100.00%	0.00%	0.00%
Line Items	Nuclear Decommissioning	\$ 37,938,712	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	New System Generation Charge	\$ 96,956,158	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Competition Transition Charge	\$ 8,518,646	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Energy Cost Recovery Account	\$ (19,846,861)	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Residential CARE Contribution		TRUE	FALSE	100.00%	0.00%	0.00%
	See "New Rates" Section (pg. 7 - 9)						
Line Items	2023 Total Estimated CARE Discount	\$ (891,914,356)					
	Note: included for comparison to model-calculated values						
Delivery RR - Before CARE Bill Discount		\$ 7,032,741,656					

SCE

Cost Category	Cost Component (See "Glossary" tab for descriptions)	Residential Revenue Requirement	CARE-Exempt	Bundled Generation	Percent to Include in Customer Charge	Percent to Include in Demand Charge	Percent to Include in Volumetric Charge
		\$	T/F	T/F	%	%	%
Generation	PCIA	\$ 18,066,203	FALSE	FALSE	0.00%	0.00%	100.00%
Generation	Marginal Energy Cost	\$ 606,708,166	FALSE	TRUE	0.00%	0.00%	100.00%
Generation	Marginal Generation Capacity Cost	\$ 584,831,167	FALSE	TRUE	0.00%	0.00%	100.00%
Generation	Non-Marginal Generation	\$ 1,378,829,544	FALSE	TRUE	0.00%	0.00%	100.00%
Distribution	Marginal - Customer	\$ 427,567,610	FALSE	FALSE	100.00%	0.00%	0.00%
Distribution	Marginal - Grid	\$ 888,543,196	FALSE	FALSE	0.00%	0.00%	100.00%
Distribution	Marginal - Peak	\$ 503,372,326	FALSE	FALSE	0.00%	0.00%	100.00%
Distribution	Non-Marginal Distribution	\$ 1,845,967,040	FALSE	FALSE	15.00%	0.00%	85.00%
Transmission	Base Transmission	\$ 599,320,433	FALSE	FALSE	0.00%	0.00%	100.00%
Transmission	Transmission Balancing Accounts	\$ (1,839,212)	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Public Purpose Programs - SGIP	\$ 23,619,309	TRUE	FALSE	100.00%	0.00%	0.00%
Line Items	Wildfire Fund Charge	\$ 103,390,404	TRUE	FALSE	100.00%	0.00%	0.00%
Line Items	Wildfire Hardening Charge	\$ 17,556,861	TRUE	FALSE	100.00%	0.00%	0.00%
Line Items	Recovery Bond Charge	\$ -	TRUE	FALSE	0.00%	0.00%	100.00%
Line Items	Recovery Bond Credit	\$ (40,575,857)	TRUE	FALSE	0.00%	0.00%	100.00%
Line Items	Public Purpose Programs - Not CARE Exempt	\$ 313,291,510	FALSE	FALSE	100.00%	0.00%	0.00%
Line Items	Nuclear Decommissioning	\$ 2,364,701	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	New System Generation Charge	\$ 148,976,188	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Residential CARE Contribution		TRUE	FALSE	100.00%	0.00%	0.00%
	See "New Rates" Section (pg. 7 - 9)						
Line Items	2023 Total Estimated CARE Discount	\$ (660,034,291)					
	Note: included for comparison to model-calculated values						
Delivery RR - Before CARE Bill Discount		\$ 6,995,933,045					

SDG&E

Cost Category	Cost Component (See "Glossary" tab for descriptions)	Residential Revenue Requirement	CARE-Exempt	Bundled Generation	Percent to Include in Customer Charge	Percent to Include in Demand Charge	Percent to Include in Volumetric Charge
		\$	T/F	T/F	%	%	%
Generation	PCIA	\$ 180,005,950	FALSE	FALSE	0.00%	0.00%	100.00%
Generation	Marginal Energy Cost	\$ 100,915,850	FALSE	TRUE	0.00%	0.00%	100.00%
Generation	Marginal Generation Capacity Cost	\$ 57,547,258	FALSE	TRUE	0.00%	0.00%	100.00%
Generation	Non-Marginal Generation	\$ 163,094,812	FALSE	TRUE	0.00%	0.00%	100.00%
Distribution	Marginal - Customer	\$ 183,005,936	FALSE	FALSE	100.00%	0.00%	0.00%
Distribution	Marginal Demand - Non-Coincident Peak	\$ 198,205,378	FALSE	FALSE	0.00%	0.00%	100.00%
Distribution	Marginal Demand - Coincident Peak	\$ 26,974,391	FALSE	FALSE	0.00%	0.00%	100.00%
Distribution	Non-Marginal Distribution	\$ 490,650,411	FALSE	FALSE	15.00%	0.00%	85.00%
Transmission	Base Transmission	\$ 537,401,722	FALSE	FALSE	0.00%	0.00%	100.00%
Transmission	Transmission Balancing Accounts	\$ (111,012,377)	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Public Purpose Programs - SGIP	\$ 8,781,000	TRUE	FALSE	100.00%	0.00%	0.00%
Line Items	Wildfire Fund Charge	\$ 29,143,070	TRUE	FALSE	100.00%	0.00%	0.00%
Line Items	Public Purpose Programs - Not CARE Exempt	\$ 61,433,000	FALSE	FALSE	100.00%	0.00%	0.00%
Line Items	Nuclear Decommissioning	\$ 526,530	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Local Generation Charge/New System Generation Charge	\$ 81,949,029	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Competition Transition Charge	\$ 11,052,908	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Total Rate Adjustment Component - Baseline adjustment	\$ 1,000,000	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Reliability Services	\$ 177,809	FALSE	FALSE	0.00%	0.00%	100.00%
Line Items	Residential CARE Contribution		TRUE	FALSE	100.00%	0.00%	0.00%
	See "New Rates" Section (pg. 7 - 9)						
Line Items	2023 Total Estimated CARE Discount	\$ (178,549,476)					
	Note: included for comparison to model-calculated values						
Delivery RR - Before CARE Bill Discount		\$ 2,020,852,676					

Rate Design Inputs

		PG&E	SCE	SDG&E
Customer charge option		User-Defined CARE Charge	User-Defined CARE Charge	User-Defined CARE Charge
<i>Customer Charge Weighting is used when Customer Charge Option is set to "Uniform Weights"</i>				
Customer Charge Weighting	[0,25]	1.0000	1.0000	1.0000
	[25,50]	1.0000	1.0000	1.0000
	[50,75]	2.0000	2.0000	2.0000
	[75,100]	2.0000	2.0000	2.0000
	[100,150]	3.0000	3.0000	3.0000
	[150,200]	3.0000	3.0000	3.0000
	200+	3.0000	3.0000	3.0000
<i>Customer Charge Weighting is used when Customer Charge Option is set to "User-Defined CARE Charges"</i>				
CARE Customer Charge (\$/mo)	[0,25]	4.0000	4.0000	4.0000
	[25,50]	7.0000	7.0000	7.0000
	[50,75]	7.0000	7.0000	7.0000
	[75,100]	7.0000	7.0000	7.0000
	[100,150]	7.0000	7.0000	7.0000
	[150,200]	7.0000	7.0000	7.0000
	200+	7.0000	7.0000	7.0000
<i>Non-CARE Customer Charge Weighting is used when Customer Charge Option is set to "User-Defined CARE Charges"</i>				
Non-CARE Customer Charge Weighting	[0,25]	1.0000	1.0000	1.0000
	[25,50]	1.0000	1.0000	1.0000
	[50,75]	1.0000	1.0000	1.0000
	[75,100]	1.0000	1.0000	1.0000
	[100,150]	1.0000	1.0000	1.0000
	[150,200]	1.0000	1.0000	1.0000
	200+	1.0000	1.0000	1.0000
<i>Average CARE Program Discount is used when Customer Charge Option is set to "User-Defined CARE Charges"</i>				
Average CARE Program Discount (\$/month)		\$ -	\$ -	\$ -
Demand Charge Options				
Billing determinant to use		Billing Month	Billing Month	Billing Month
No. of highest demand months to include		\$ 3.0000	\$ 3.0000	\$ 3.0000
Adjustments to distribution rate				
Include baseline credit from existing rate (if applicable)		Equal Cents	Equal Cents	Equal Cents
		TRUE	TRUE	TRUE

Revenue Requirement Components

PG&E

Based on CARE program size from E-TOU-C

Delivery - excluding CARE-exempt		
Rev Req - Customer	Rev Req - Demand	Rev Req - Volumetric
\$ 960,562,365	\$ -	\$ 4,258,542,379

Delivery - CARE-exempt		
Rev Req - Customer	Rev Req - Demand	Rev Req - Volumetric
\$ 430,234,289	\$ -	\$ -

Delivery - excluding CARE-exempt	
Volumetric Rev Req Breakdown	
Distribution	\$ 2,503,912,869
NBCs	\$ 46,457,358
Non-Dist	\$ 1,708,172,152

Delivery - CARE-exempt	
Volumetric Rev Req Breakdown	
Distribution	\$ -
NBCs	\$ -
Non-Dist	\$ -

SDG&E

Based on CARE program size from TOU-DR1

Delivery - excluding CARE-exempt		
Rev Req - Customer	Rev Req - Demand	Rev Req - Volumetric
\$ 318,036,498	\$ -	\$ 1,343,334,188

Delivery - CARE-exempt		
Rev Req - Customer	Rev Req - Demand	Rev Req - Volumetric
\$ 97,307,422	\$ -	\$ -

Delivery - excluding CARE-exempt	
Volumetric Rev Req Breakdown	
Distribution	\$ 642,232,618
NBCs	\$ 11,579,438
Non-Dist	\$ 689,522,133

Delivery - CARE-exempt	
Volumetric Rev Req Breakdown	
Distribution	\$ -
NBCs	\$ -
Non-Dist	\$ -

SCE

Based on CARE program size from TOU-D-4-9

Delivery - excluding CARE-exempt		
Rev Req - Customer	Rev Req - Demand	Rev Req - Volumetric
\$ 1,017,754,176	\$ -	\$ 3,727,875,818

Delivery - CARE-exempt		
Rev Req - Customer	Rev Req - Demand	Rev Req - Volumetric
\$ 314,110,689	\$ -	\$ (40,575,857)

Delivery - excluding CARE-exempt	
Volumetric Rev Req Breakdown	
Distribution	\$ 2,960,987,505
NBCs	\$ 2,364,701
Non-Dist	\$ 764,523,612

Delivery - CARE-exempt	
Volumetric Rev Req Breakdown	
Distribution	\$ -
NBCs	\$ -
Non-Dist	\$ (40,575,857)

New Rates

	PG&E	PG&E	PG&E	PG&E	PG&E	PG&E
	E-1	E-1	E-TOU-C	E-TOU-C	EV2-A	EV2-A
	Non-CARE	CARE	Non-CARE	CARE	Non-CARE	CARE
Income Bracket (1000\$):						
[0,25]	\$ 30.0100	\$ 4.0000	\$ 29.9577	\$ 4.0000	\$ 29.9278	\$ 4.0000
[25,50]	\$ 30.0100	\$ 7.0000	\$ 29.9577	\$ 7.0000	\$ 29.9278	\$ 7.0000
[50,75]	\$ 30.0100	\$ 7.0000	\$ 29.9577	\$ 7.0000	\$ 29.9278	\$ 7.0000
[75,100]	\$ 30.0100	\$ 7.0000	\$ 29.9577	\$ 7.0000	\$ 29.9278	\$ 7.0000
[100,150]	\$ 30.0100	\$ 7.0000	\$ 29.9577	\$ 7.0000	\$ 29.9278	\$ 7.0000
[150,200]	\$ 30.0100	\$ 7.0000	\$ 29.9577	\$ 7.0000	\$ 29.9278	\$ 7.0000
200+	\$ 30.0100	\$ 7.0000	\$ 29.9577	\$ 7.0000	\$ 29.9278	\$ 7.0000
Tier Credits/Charges (\$/kWh)						
Baseline Credit	\$ 0.0657	\$ 0.0427	\$ 0.0657	\$ 0.0427	\$ -	\$ -
High Usage Charge	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Demand Charges (\$/kW)						
Billing Determinant	Billing Month	Billing Month	Billing Month	Billing Month	Billing Month	Billing Month
No. of Highest Demand Months	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000
Demand Charge (\$/kW-mo)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Energy Charges (\$/kWh)						
Summer - Peak	\$ 0.3319	\$ 0.2158	\$ 0.4236	\$ 0.2753	\$ 0.4974	\$ 0.3233
Summer - Part-Peak	\$ 0.3319	\$ 0.2158	\$ -	\$ -	\$ 0.3869	\$ 0.2515
Summer - Off-Peak	\$ 0.3319	\$ 0.2158	\$ 0.3601	\$ 0.2341	\$ 0.1849	\$ 0.1202
Winter - Peak	\$ 0.3319	\$ 0.2158	\$ 0.3265	\$ 0.2122	\$ 0.3703	\$ 0.2407
Winter - Part-Peak	\$ 0.3319	\$ 0.2158	\$ -	\$ -	\$ 0.3536	\$ 0.2298
Winter - Off-Peak	\$ 0.3319	\$ 0.2158	\$ 0.3092	\$ 0.2010	\$ 0.1849	\$ 0.1202
Total CARE Program Funding - Modeled						
Customer	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Demand	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Volumetric - Delivery	\$ (459,225,565)	\$ (459,225,565)	\$ (459,225,565)	\$ (459,225,565)	\$ (459,225,565)	\$ (459,225,565)
Volumetric - Generation	\$ (431,894,113)	\$ (431,894,113)	\$ (431,894,113)	\$ (431,894,113)	\$ (431,894,113)	\$ (431,894,113)
Total CARE Credits	\$ (891,119,677)	\$ (891,119,677)	\$ (891,119,677)	\$ (891,119,677)	\$ (891,119,677)	\$ (891,119,677)
Residential CARE Funding	\$ 241,604,920	\$ 241,604,920	\$ 241,604,920	\$ 241,604,920	\$ 241,604,920	\$ 241,604,920
Non-Res CARE Funding	\$ 649,514,757	\$ 649,514,757	\$ 649,514,757	\$ 649,514,757	\$ 649,514,757	\$ 649,514,757
Total IOU forecast CARE program size						
2023 Forecast (Existing Rates)	\$ (891,914,356)	\$ (891,914,356)	\$ (891,914,356)	\$ (891,914,356)	\$ (891,914,356)	\$ (891,914,356)
Modeled Credits as % of Forecast	0%	0%	-1%	-1%	-2%	-2%

PG&E	PG&E	SCE	SCE	SCE	SCE	SCE	SCE
E-ELEC	E-ELEC	D	D	TOU-D-4-9	TOU-D-4-9	TOU-D-PRIME	TOU-D-PRIME
Non-CARE	CARE	Non-CARE	CARE	Non-CARE	CARE	Non-CARE	CARE

\$ 29.8421	\$ 4.0000	\$ 31.0944	\$ 4.0000	\$ 31.1463	\$ 4.0000	\$ 31.1929	\$ 4.0000
\$ 29.8421	\$ 7.0000	\$ 31.0944	\$ 7.0000	\$ 31.1463	\$ 7.0000	\$ 31.1929	\$ 7.0000
\$ 29.8421	\$ 7.0000	\$ 31.0944	\$ 7.0000	\$ 31.1463	\$ 7.0000	\$ 31.1929	\$ 7.0000
\$ 29.8421	\$ 7.0000	\$ 31.0944	\$ 7.0000	\$ 31.1463	\$ 7.0000	\$ 31.1929	\$ 7.0000
\$ 29.8421	\$ 7.0000	\$ 31.0944	\$ 7.0000	\$ 31.1463	\$ 7.0000	\$ 31.1929	\$ 7.0000
\$ 29.8421	\$ 7.0000	\$ 31.0944	\$ 7.0000	\$ 31.1463	\$ 7.0000	\$ 31.1929	\$ 7.0000
\$ 29.8421	\$ 7.0000	\$ 31.0944	\$ 7.0000	\$ 31.1463	\$ 7.0000	\$ 31.1929	\$ 7.0000

\$ -	\$ -	\$ 0.0754	\$ 0.0509	\$ 0.0826	\$ 0.0557	\$ -	\$ -
\$ -	\$ -	\$ 0.0849	\$ 0.0573	\$ -	\$ -	\$ -	\$ -

Billing Month	Billing Month	Billing Month	Billing Month	Billing Month	Billing Month	Billing Month	Billing Month
\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

\$ 0.4962	\$ 0.3226	\$ 0.3389	\$ 0.2302	\$ 0.5072	\$ 0.3438	\$ 0.5935	\$ 0.4020
\$ 0.3344	\$ 0.2173	\$ 0.3389	\$ 0.2302	\$ 0.3988	\$ 0.2706	\$ 0.3358	\$ 0.2281
\$ 0.2777	\$ 0.1805	\$ 0.3389	\$ 0.2302	\$ 0.2921	\$ 0.1986	\$ 0.2135	\$ 0.1455
\$ 0.2647	\$ 0.1721	\$ 0.3389	\$ 0.2302	\$ 0.4393	\$ 0.2979	\$ 0.5361	\$ 0.3633
\$ 0.2426	\$ 0.1577	\$ 0.3389	\$ 0.2302	\$ 0.3168	\$ 0.2152	\$ 0.1927	\$ 0.1315
\$ 0.2288	\$ 0.1487	\$ 0.3389	\$ 0.2302	\$ 0.2816	\$ 0.1915	\$ 0.1927	\$ 0.1315

\$ -
\$ -
\$ (459,225,565)
\$ (405,034,979)
\$ (864,260,543)

\$ -
\$ -
\$ (312,030,241)
\$ (339,559,859)
\$ (651,590,101)

\$ -
\$ -
\$ (312,030,241)
\$ (347,681,851)
\$ (659,712,092)

\$ -
\$ -
\$ (312,030,241)
\$ (354,957,511)
\$ (666,987,753)

\$ 234,322,735
\$ 629,937,809

\$ 167,456,787
\$ 484,133,314

\$ 169,544,115
\$ 490,167,977

\$ 171,413,939
\$ 495,573,814

\$ (891,914,356)
-3%

\$ (660,034,291)
-1%

\$ (660,034,291)
0%

\$ (660,034,291)
1%

SDG&E	SDG&E	SDG&E	SDG&E	SDG&E	SDG&E	SDG&E	SDG&E
DR	DR	TOU-DR1	TOU-DR1	EV-TOU-5	EV-TOU-5	TOU-ELEC	TOU-ELEC
Non-CARE	CARE	Non-CARE	CARE	Non-CARE	CARE	Non-CARE	CARE

\$ 32.2428	\$ 4.0000	\$ 32.1493	\$ 4.0000	\$ 32.1651	\$ 4.0000	\$ 32.0854	\$ 4.0000
\$ 32.2428	\$ 7.0000	\$ 32.1493	\$ 7.0000	\$ 32.1651	\$ 7.0000	\$ 32.0854	\$ 7.0000
\$ 32.2428	\$ 7.0000	\$ 32.1493	\$ 7.0000	\$ 32.1651	\$ 7.0000	\$ 32.0854	\$ 7.0000
\$ 32.2428	\$ 7.0000	\$ 32.1493	\$ 7.0000	\$ 32.1651	\$ 7.0000	\$ 32.0854	\$ 7.0000
\$ 32.2428	\$ 7.0000	\$ 32.1493	\$ 7.0000	\$ 32.1651	\$ 7.0000	\$ 32.0854	\$ 7.0000
\$ 32.2428	\$ 7.0000	\$ 32.1493	\$ 7.0000	\$ 32.1651	\$ 7.0000	\$ 32.0854	\$ 7.0000
\$ 32.2428	\$ 7.0000	\$ 32.1493	\$ 7.0000	\$ 32.1651	\$ 7.0000	\$ 32.0854	\$ 7.0000

\$ 0.1047	\$ 0.0691	\$ 0.1047	\$ 0.0691	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Billing Month	Billing Month	Billing Month	Billing Month	Billing Month	Billing Month	Billing Month	Billing Month
\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000	\$ 3.0000
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

\$ 0.5105	\$ 0.3369	\$ 0.7731	\$ 0.5102	\$ 0.8070	\$ 0.5326	\$ 0.7420	\$ 0.4897
\$ 0.5105	\$ 0.3369	\$ 0.4596	\$ 0.3033	\$ 0.4720	\$ 0.3115	\$ 0.3727	\$ 0.2460
\$ 0.5105	\$ 0.3369	\$ 0.2950	\$ 0.1947	\$ 0.2176	\$ 0.1436	\$ 0.3242	\$ 0.2139
\$ 0.5105	\$ 0.3369	\$ 0.5763	\$ 0.3804	\$ 0.5022	\$ 0.3315	\$ 0.5009	\$ 0.3306
\$ 0.5105	\$ 0.3369	\$ 0.4918	\$ 0.3246	\$ 0.4385	\$ 0.2894	\$ 0.3595	\$ 0.2373
\$ 0.5105	\$ 0.3369	\$ 0.4672	\$ 0.3084	\$ 0.2093	\$ 0.1382	\$ 0.3154	\$ 0.2081

\$ -
\$ -
\$ (110,610,060)
\$ (100,157,376)
\$ (210,767,436)

\$ -
\$ -
\$ (110,610,060)
\$ (96,179,165)
\$ (206,789,225)

\$ -
\$ -
\$ (110,610,060)
\$ (96,851,978)
\$ (207,462,038)

\$ -
\$ -
\$ (110,610,060)
\$ (93,461,884)
\$ (204,071,944)

\$ 60,525,769
\$ 150,241,667

\$ 59,383,352
\$ 147,405,873

\$ 59,576,563
\$ 147,885,475

\$ 58,603,035
\$ 145,468,909

\$ (178,549,476)
18%

\$ (178,549,476)
16%

\$ (178,549,476)
16%

\$ (178,549,476)
14%

Bill Impacts

PG&E

Income Bracket	Bill Discount		Customer Average Bill Impact (\$/mo)										
			PG&E	P	Q	R	S	T	V	W	X	Y	Z
\$0 - \$25,000	None	1	\$ 5.81	\$ (6.33)	\$ (3.39)	\$ (6.21)	\$ (3.73)	\$ 11.22	\$ 1.88	\$ (4.34)	\$ 3.82	\$ 3.19	\$ 14.48
\$25,000 - \$50,000	None	2	\$ 2.74	\$ (6.12)	\$ (3.38)	\$ (6.28)	\$ (3.59)	\$ 11.27	\$ 1.79	\$ (4.54)	\$ 3.81	\$ 3.19	\$ 14.50
\$50,000 - \$75,000	None	3	\$ 2.36	\$ (5.93)	\$ (3.29)	\$ (5.62)	\$ (3.11)	\$ 11.33	\$ 1.80	\$ (3.69)	\$ 3.91	\$ 3.19	\$ 14.46
\$75,000 - \$100,000	None	4	\$ 2.94	\$ (5.58)	\$ (3.31)	\$ (4.76)	\$ (2.42)	\$ 11.37	\$ 1.88	\$ (2.47)	\$ 3.98	\$ 3.19	\$ 14.48
\$100,00 - \$150,000	None	5	\$ 3.69	\$ (5.18)	\$ (3.08)	\$ (3.75)	\$ (1.64)	\$ 11.42	\$ 1.96	\$ (1.01)	\$ 4.12	\$ 3.19	\$ 14.50
\$150,000 - \$200,000	None	6	\$ 4.64	\$ (4.40)	\$ (2.91)	\$ (2.60)	\$ (0.66)	\$ 11.46	\$ 2.06	\$ 0.63	\$ 4.30	\$ 3.19	\$ 14.44
\$200,000+	None	7	\$ 5.95	\$ (3.41)	\$ (2.34)	\$ (0.85)	\$ 0.75	\$ 11.53	\$ 2.09	\$ 2.55	\$ 4.82	\$ 3.18	\$ 14.45
\$0 - \$25,000	CARE	1	\$ (8.12)	\$ (13.25)	\$ (10.56)	\$ (11.25)	\$ (9.99)	\$ (3.83)	\$ (6.23)	\$ (10.87)	\$ (6.24)	\$ (11.44)	\$ (7.86)
\$25,000 - \$50,000	CARE	2	\$ (5.38)	\$ (10.19)	\$ (7.55)	\$ (8.01)	\$ (6.83)	\$ (0.80)	\$ (3.24)	\$ (7.52)	\$ (3.19)	\$ (8.44)	\$ (4.94)
\$50,000 - \$75,000	CARE	3	\$ (5.01)	\$ (10.10)	\$ (7.34)	\$ (7.77)	\$ (6.71)	\$ (0.78)	\$ (3.17)	\$ (7.12)	\$ (3.17)	\$ (8.43)	\$ (4.99)
\$75,000 - \$100,000	CARE	4	\$ (4.87)	\$ (10.08)	\$ (6.93)	\$ (7.67)	\$ (6.53)	\$ (0.76)	\$ (3.10)	\$ (6.75)	\$ (3.17)	\$ (8.43)	\$ (5.01)
\$100,000 - \$150,000	CARE	5	\$ (4.66)	\$ (10.02)	\$ (7.48)	\$ (7.38)	\$ (6.37)	\$ (0.75)	\$ (3.21)	\$ (6.53)	\$ (3.10)	\$ (8.43)	\$ (5.05)
\$150,000 - \$200,000	CARE	6	\$ (4.28)	\$ (9.90)	\$ (7.65)	\$ (7.20)	\$ (6.22)	\$ (0.76)	\$ (3.23)	\$ (5.99)	\$ (3.09)	\$ (8.43)	\$ (4.90)
\$200,000+	CARE	7	\$ (3.71)	\$ (9.54)	\$ (7.65)	\$ (6.85)	\$ (5.97)	\$ (0.75)	\$ (3.10)	\$ (5.76)	\$ (3.03)	\$ (8.42)	\$ (7.36)
\$0 - \$25,000	FERA	1	\$ (22.65)	\$ (33.88)	\$ (28.22)	\$ (29.31)	\$ (26.99)	\$ (14.51)	\$ (19.38)	\$ (28.49)	\$ (19.39)	\$ (30.38)	\$ (22.93)
\$25,000 - \$50,000	FERA	2	\$ (23.00)	\$ (33.78)	\$ (28.20)	\$ (28.57)	\$ (26.56)	\$ (14.45)	\$ (19.40)	\$ (27.48)	\$ (19.27)	\$ (30.38)	\$ (23.49)
\$50,000 - \$75,000	FERA	3	\$ (22.33)	\$ (33.62)	\$ (27.68)	\$ (27.86)	\$ (26.24)	\$ (14.41)	\$ (19.26)	\$ (26.41)	\$ (19.21)	\$ (30.39)	\$ (23.71)
\$75,000 - \$100,000	FERA	4	\$ (22.11)	\$ (33.59)	\$ (26.71)	\$ (27.60)	\$ (25.81)	\$ (14.36)	\$ (19.11)	\$ (25.52)	\$ (19.22)	\$ (30.39)	\$ (23.83)
\$100,000 - \$150,000	FERA	5	\$ (21.78)	\$ (33.48)	\$ (28.02)	\$ (26.86)	\$ (25.41)	\$ (14.34)	\$ (19.34)	\$ (25.02)	\$ (19.07)	\$ (30.39)	\$ (23.99)
\$150,000 - \$200,000	FERA	6	\$ (21.13)	\$ (33.29)	\$ (28.45)	\$ (26.44)	\$ (25.08)	\$ (14.35)	\$ (19.37)	\$ (23.91)	\$ (19.04)	\$ (30.40)	\$ (23.22)
\$200,000+	FERA	7	\$ (20.20)	\$ (32.68)	\$ (28.45)	\$ (25.67)	\$ (24.52)	\$ (14.34)	\$ (19.10)	\$ (23.49)	\$ (18.91)	\$ (30.40)	\$ (26.31)

New rate option
 Counterfactual rate option
 Use model-calculated counterfactual rates

 Select single new rate (if applicable)
 Select single counterfactual rate (if applicable)

User-selected rate across all subclasses
User-selected rate across all subclasses
TRUE
E-TOU-C
E-TOU-C

SDG&E

Income Bracket	Bill Discount	Customer Average Bill Impact (\$/mo)					
		SDG&E	Inland	Coastal	Desert	Mountain	
\$0 - \$25,000	None	1	\$ 4.59	\$ 2.80	\$ 5.47	\$ 1.77	\$ (9.02)
\$25,000 - \$50,000	None	2	\$ 4.44	\$ 2.45	\$ 5.47	\$ 1.56	\$ (7.98)
\$50,000 - \$75,000	None	3	\$ 4.09	\$ 2.42	\$ 5.50	\$ 2.18	\$ (7.67)
\$75,000 - \$100,000	None	4	\$ 4.11	\$ 2.58	\$ 5.55	\$ 3.00	\$ (7.21)
\$100,00 - \$150,000	None	5	\$ 4.44	\$ 3.14	\$ 5.72	\$ 2.47	\$ (6.04)
\$150,000 - \$200,000	None	6	\$ 4.99	\$ 3.97	\$ 5.91	\$ 6.73	\$ (4.42)
\$200,000+	None	7	\$ 5.94	\$ 5.11	\$ 6.46	\$ 2.26	\$ (2.39)
\$0 - \$25,000	CARE	1	\$ (8.71)	\$ (10.19)	\$ (7.00)	\$ (22.31)	\$ (24.49)
\$25,000 - \$50,000	CARE	2	\$ (5.77)	\$ (7.16)	\$ (4.00)	\$ (19.94)	\$ (21.22)
\$50,000 - \$75,000	CARE	3	\$ (5.68)	\$ (7.12)	\$ (3.98)	N/A	\$ (21.26)
\$75,000 - \$100,000	CARE	4	\$ (5.39)	\$ (7.09)	\$ (3.91)	N/A	\$ (21.59)
\$100,000 - \$150,000	CARE	5	\$ (5.20)	\$ (7.13)	\$ (3.94)	N/A	N/A
\$150,000 - \$200,000	CARE	6	\$ (3.64)	N/A	\$ (3.64)	N/A	N/A
\$200,000+	CARE	7	N/A	N/A	N/A	N/A	N/A
\$0 - \$25,000	FERA	1	\$ (20.63)	\$ (22.90)	\$ (17.63)	\$ (41.39)	\$ (46.46)
\$25,000 - \$50,000	FERA	2	\$ (20.74)	\$ (22.85)	\$ (17.63)	\$ (42.70)	\$ (45.84)
\$50,000 - \$75,000	FERA	3	\$ (20.62)	\$ (22.78)	\$ (17.61)	N/A	\$ (45.94)
\$75,000 - \$100,000	FERA	4	\$ (20.15)	\$ (22.74)	\$ (17.52)	N/A	\$ (46.67)
\$100,000 - \$150,000	FERA	5	\$ (19.79)	\$ (22.81)	\$ (17.56)	N/A	N/A
\$150,000 - \$200,000	FERA	6	\$ (17.20)	N/A	\$ (17.20)	N/A	N/A
\$200,000+	FERA	7	N/A	N/A	N/A	N/A	N/A

New rate option	User-selected rate across all subclasses
Counterfactual rate option	User-selected rate across all subclasses
Use model-calculated counterfactual rates	TRUE
Select single new rate (if applicable)	TOU-DR1
Select single counterfactual rate (if applicable)	TOU-DR1

SCE

Income Bracket	Bill Discount		Customer Average Bill Impact (\$/mo)									
			SCE	5	6	8	9	10	13	14	15	16
\$0 - \$25,000	None	1	\$ 1.89	\$ (0.14)	\$ 7.19	\$ 5.53	\$ (0.66)	\$ (1.78)	\$ (7.63)	\$ (5.60)	\$ (10.93)	\$ 3.99
\$25,000 - \$50,000	None	2	\$ 0.83	\$ (0.14)	\$ 7.22	\$ 5.44	\$ (1.00)	\$ (2.69)	\$ (7.15)	\$ (5.29)	\$ (11.74)	\$ 4.04
\$50,000 - \$75,000	None	3	\$ 1.02	\$ (0.14)	\$ 7.26	\$ 5.44	\$ (1.03)	\$ (2.58)	\$ (6.29)	\$ (4.92)	\$ (11.20)	\$ 4.09
\$75,000 - \$100,000	None	4	\$ 1.33	\$ (0.14)	\$ 7.28	\$ 5.50	\$ (0.90)	\$ (2.19)	\$ (5.64)	\$ (4.36)	\$ (10.70)	\$ 4.26
\$100,00 - \$150,000	None	5	\$ 1.82	\$ (0.14)	\$ 7.35	\$ 5.61	\$ (0.73)	\$ (1.50)	\$ (4.81)	\$ (3.77)	\$ (10.25)	\$ 4.42
\$150,000 - \$200,000	None	6	\$ 2.42	\$ (0.14)	\$ 7.42	\$ 5.77	\$ (0.41)	\$ (0.84)	\$ (4.21)	\$ (3.12)	\$ (9.72)	\$ 4.61
\$200,000+	None	7	\$ 3.45	\$ (0.14)	\$ 7.58	\$ 6.12	\$ 0.06	\$ (0.02)	\$ (2.96)	\$ (2.30)	\$ (8.80)	\$ 4.74
\$0 - \$25,000	CARE	1	\$ (9.55)	N/A	\$ (5.20)	\$ (6.46)	\$ (8.55)	\$ (11.92)	\$ (13.30)	\$ (13.51)	\$ (15.19)	\$ (10.38)
\$25,000 - \$50,000	CARE	2	\$ (6.38)	N/A	\$ (2.19)	\$ (3.45)	\$ (5.54)	\$ (8.84)	\$ (10.11)	\$ (10.31)	\$ (11.90)	\$ (7.31)
\$50,000 - \$75,000	CARE	3	\$ (6.29)	N/A	\$ (2.18)	\$ (3.44)	\$ (5.53)	\$ (8.72)	\$ (9.96)	\$ (10.20)	\$ (11.75)	\$ (7.32)
\$75,000 - \$100,000	CARE	4	\$ (6.28)	N/A	\$ (2.18)	\$ (3.44)	\$ (5.52)	\$ (8.64)	\$ (9.80)	\$ (10.18)	\$ (11.61)	\$ (7.32)
\$100,000 - \$150,000	CARE	5	\$ (6.13)	N/A	\$ (2.16)	\$ (3.43)	\$ (5.51)	\$ (8.51)	\$ (9.79)	\$ (9.96)	\$ (11.51)	\$ (7.21)
\$150,000 - \$200,000	CARE	6	\$ (5.88)	N/A	\$ (2.15)	\$ (3.40)	\$ (5.48)	\$ (8.28)	\$ (9.61)	\$ (9.73)	\$ (11.28)	\$ (7.07)
\$200,000+	CARE	7	\$ (5.51)	N/A	\$ (2.15)	\$ (3.37)	\$ (5.45)	\$ (8.10)	\$ (9.34)	\$ (9.57)	\$ (10.84)	\$ (6.91)
\$0 - \$25,000	FERA	1	\$ (22.40)	N/A	\$ (15.12)	\$ (17.28)	\$ (21.01)	\$ (26.58)	\$ (28.75)	\$ (29.28)	\$ (32.35)	\$ (24.34)
\$25,000 - \$50,000	FERA	2	\$ (22.22)	N/A	\$ (15.10)	\$ (17.26)	\$ (20.99)	\$ (26.39)	\$ (28.22)	\$ (28.83)	\$ (31.62)	\$ (24.20)
\$50,000 - \$75,000	FERA	3	\$ (22.11)	N/A	\$ (15.09)	\$ (17.24)	\$ (20.97)	\$ (26.12)	\$ (27.86)	\$ (28.59)	\$ (31.27)	\$ (24.22)
\$75,000 - \$100,000	FERA	4	\$ (22.10)	N/A	\$ (15.08)	\$ (17.23)	\$ (20.96)	\$ (25.96)	\$ (27.48)	\$ (28.54)	\$ (30.93)	\$ (24.22)
\$100,000 - \$150,000	FERA	5	\$ (21.88)	N/A	\$ (15.06)	\$ (17.20)	\$ (20.95)	\$ (25.67)	\$ (27.44)	\$ (28.08)	\$ (30.72)	\$ (24.01)
\$150,000 - \$200,000	FERA	6	\$ (21.47)	N/A	\$ (15.04)	\$ (17.16)	\$ (20.90)	\$ (25.20)	\$ (27.04)	\$ (27.63)	\$ (30.20)	\$ (23.76)
\$200,000+	FERA	7	\$ (20.87)	N/A	\$ (15.03)	\$ (17.10)	\$ (20.85)	\$ (24.86)	\$ (26.48)	\$ (27.31)	\$ (29.30)	\$ (23.48)

New rate option	User-selected rate across all subclasses
Counterfactual rate option	User-selected rate across all subclasses
Use model-calculated counterfactual rates	TRUE
Select single new rate (if applicable)	TOU-D-4-9
Select single counterfactual rate (if applicable)	TOU-D-4-9