



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Advance  
Demand Flexibility Through Electric Rates.

Rulemaking 22-07-005  
Filed: July 14, 2022

**FILED**

09/08/23

04:59 PM

R2207005

**JOINT MOTION TO  
ADMIT EXHIBITS INTO EVIDENTIARY RECORD FOR TRACK A**

GAIL L. SLOCUM  
JENNIFER REYES LAGUNERO  
Pacific Gas and Electric Company  
Law Department, 19<sup>th</sup> Floor  
300 Lakeside Drive, Suite 210  
Oakland, CA 94612  
Telephone: (925) 786-5113  
Facsimile: (510) 898-9696  
E-Mail: Jennifer.ReyesLagunero@pge.com

Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

Dated: September 8, 2023

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Advance  
Demand Flexibility Through Electric Rates.

Rulemaking 22-07-005  
Filed: July 14, 2022

**JOINT MOTION TO  
ADMIT EXHIBITS INTO EVIDENTIARY RECORD FOR TRACK A**

**I. INTRODUCTION**

Pursuant to the assigned Administrative Law Judge’s *Ruling Addressing the Track A Procedural Schedule, Opening Briefs Guidance, and Exhibits* (August 22 Ruling),<sup>1</sup> Pacific Gas and Electric Company (PG&E) respectfully files this *Joint Motion to Admit Exhibits into the Evidentiary Record* (Joint Motion) on behalf of the parties enumerated in Section II.A.

**II. PROCEDURAL BACKGROUND**

On August 25, 2023, PG&E circulated a draft of this Joint Motion and its appendices to parties on the service list. Since the August 22 Ruling provides an opportunity for parties to respond to this Joint Motion, PG&E also informed parties that it would not be including any objections in this filing.

The following parties submitted revisions and/or comments: Advanced Energy United (AER), Bear Valley Electric Service, Inc. (Bear Valley), California Community Choice Association (CalCCA), California Energy Storage Alliance (CESA), California Environmental Justice Alliance (CEJA), Center for Accessible Technology (CforAT), Clean Coalition, Liberty Utilities (CalPeco Electric) LLC (Liberty Utilities), Natural Resource Defense Council (NRDC), PacifiCorp, Public Advocates Office at the California Public Utilities Commission (Cal Advocates), San Diego Gas & Electric Company (SDG&E), Sierra Club, Solar Energy Industries Association (SEIA), Southern California Edison Company (SCE), The Utility Reform Network (TURN), Utility Consumers’ Action Network (UCAN).

---

<sup>1</sup> R.22-07-005, *Ruling Addressing the Track A Procedural Schedule, Opening Briefs Guidance, and Exhibits* (August 22, 2023).

On September 6, 2023, PG&E sent a copy of the consolidated Joint Motion, seeking confirmation that PG&E had authority to file it on September 8, 2023 on behalf of parties' pursuant to the August 22 Ruling and Rule 1.8 (d) of the Commission's Rules of Practice and Procedure. The following parties affirmatively responded to PG&E's email and expressly granted PG&E authority to file this Joint Motion on their behalf:

- 350 Bay Area
- AEU
- Bear Valley
- Cal Advocates
- CalCCA
- CEJA
- CESA
- CforAT
- Clean Coalition
- Liberty Utilities
- NRDC
- PacifiCorp
- SCE
- SDG&E
- SEIA
- Sierra Club
- TURN
- UCAN

Due to the large number of parties in this proceeding, if a party is unnamed above, then they: (1) are not moving to include any exhibits into the record at this time, (2) did not respond, or (3) did not provide PG&E with an email response by September 6, 2023 in time for it to be included in this filing.

### **III. DISCUSSION**

#### **A. Exhibits**

The August 22 Ruling provides:

PG&E is directed to work with parties to file and serve the Exhibits Motion in accordance with the following directions:

- a. The list of exhibits shall be in the attached format and will include the full web address of the e-filed Supporting Document.
- b. The list of exhibits will include all items that parties seek to have identified and received into evidence.

Parties may include in the Exhibits Motion supplemental testimony with material facts included in comments on the June 19 Ruling and/or material facts necessary to address the opening briefs guidance questions in this ruling.<sup>2</sup>

Pursuant to the August 22 Ruling, and Rules 13.7 and 13.8 of the Commission's Rules of Practice and Procedure, Appendix A includes, in the provided format, the list of exhibits to date that parties seek to include as part of the evidentiary record.<sup>3</sup>

The parties note that discovery is ongoing and there are several data request responses that are pending. Therefore, each party to this motion respectfully requests the right to file and serve a motion to admit further additional exhibits, as necessary, to be entered into the evidentiary record. Not all parties may have the opportunity to review or test the veracity of such exhibits prior to the filing of a motion. Certain parties may also object to entry of additional exhibits.

#### **B. Stipulations**

The August 22 Ruling states: "parties should not submit another joint case management statement in this proceeding. However, parties may serve additional joint stipulations and include these joint stipulations in the Exhibits Motion." The August 22 Ruling also states: "Parties should include any stipulations in proposed exhibits. If any stipulations are not included

---

<sup>2</sup> August 22 Ruling, pp. 7-8.

<sup>3</sup> While PG&E submits this Joint Motion and compiled the Exhibit List, each party is ultimately responsible for confirming that their respective exhibits comply with the August 22 Ruling.

in the Exhibits Motion, parties will file and serve a motion to receive these additional exhibits into evidence.”

Appendix B is “Joint Stipulation-01” which includes the list of undisputed facts from the Joint Case Management Statement filed August 11, 2023. This list does not preclude parties from attempting to garner additional stipulations for submittal through subsequent motions as permitted by the August 22 Ruling.

#### IV. CONCLUSION

The Parties appreciate the opportunity to submit this Joint Motion to Admit Exhibits to the Evidentiary Record for Track A.

Respectfully submitted on behalf of Parties,

By: /s/ Jennifer Reyes Lagunero  
JENNIFER REYES LAGUNERO

Pacific Gas and Electric Company  
Law Department, 19<sup>th</sup> Floor  
300 Lakeside Drive, Suite 210  
Oakland, CA 94612  
Telephone: (925)786-5113  
Facsimile: (510) 898-9696  
E-Mail: [Jennifer.ReyesLagunero@pge.com](mailto:Jennifer.ReyesLagunero@pge.com)

Dated: September 8, 2023

Attorney for  
PACIFIC GAS AND ELECTRIC COMPANY

**PACIFIC GAS AND ELECTRIC COMPANY**

**APPENDIX A**

<b>Proceeding No.</b>
R.22-07-005

## Exhibit List

<b>ALJ</b>
Wang

<b>Exh. No.</b>	<b>Sponsor</b>	<b>Description</b>	<b>Web Address of Supporting Document</b>
AEU-01	Brian Turner	Rebuttal Testimony of Brian Turner on Behalf of Advanced Energy United	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6665/519776725.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6665/519776725.pdf</a>
AEU-02	Brian Turner	Comments of Advanced Energy United on Administrative Law Judge's Ruling on the Implementation Pathway for Income-Graduated Fixed Charges	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6665/519776508.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6665/519776508.pdf</a>
BVES-1	Sean Matlock	Opening Testimony of Bear Valley Electric Service, Inc., Providing Income-Graduated Fixed Charge Proposal	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5905/505718259.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5905/505718259.pdf</a>
Cal Advocates -01-E	Nathan Chau Otto Nichols	Errata on Prepared Testimony on Rulemaking to Advance Demand Flexibility Through Electric Rates – Income Graduated Fixed Charge Rate Design (Clean Version)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5995/507805061.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5995/507805061.pdf</a>
Cal Advocates -02	Alejandro Marquez	Prepared Testimony on Rulemaking to Advance Demand Flexibility Through Electric Rates – Income Verification Implementation (Public Version)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5913/505449162.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5913/505449162.pdf</a>
Cal Advocates -02C	Alejandro Marquez	Prepared Testimony on Rulemaking to Advance Demand Flexibility Through Electric Rates – Income Verification Implementation (Confidential Version)	Confidential
Cal Advocates -03	Nathan Chau Otto Nichols	Rebuttal Testimony on Rulemaking to Advance Demand Flexibility Through Electric Rates – Income Graduated Fixed Charge Rate Design	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6146/510287690.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6146/510287690.pdf</a>

<b>Exh. No.</b>	<b>Sponsor</b>	<b>Description</b>	<b>Web Address of Supporting Document</b>
Cal Advocates -04	Alejandro Marquez	Rebuttal Testimony on Rulemaking to Advance Demand Flexibility Through Electric Rates – Income Verification Implementation	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6146/510460496.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6146/510460496.pdf</a>
Cal Advocates -05	Nathan Chau Otto Nichols Alejandro Marquez	Comments of the Public Advocates Office on the Assigned Commissioner's Ruling Inviting Comments on the Implementation Pathway for Income-Graduated Fixed Charges. Filed July 31, 2023	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6629/518988973.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6629/518988973.pdf</a>
Cal Advocates -06	Nathan Chau Otto Nichols Alejandro Marquez	Reply Comments of the Public Advocates Office on the Assigned Commissioner's Ruling Inviting Comments on the Implementation Pathway for Income-Graduated Fixed Charges. Filed August 21, 2023.	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6629/518988972.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6629/518988972.pdf</a>
Cal Advocates -07	Alejandro Marquez	Brief Excerpt of Equifax’s Master Service Agreement with California Department of General Services Showing Employment/Income Verification Contract and Rate Sheet	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6630/518936263.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6630/518936263.pdf</a>
Cal Advocates -08	Mike Bromley	Declaration of Mike Bromley, General Manager of Government Solutions, Equifax Workforce Solutions, LLC, Regarding The Work Number Tool and Its Successful Use Toward Income Verification	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6632/518983215.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6632/518983215.pdf</a>
CASMU-1	Sean Matlock Cynthia Fisher Robert Meredith	Joint Reply Testimony of Bear Valley Electric Service, Inc., Liberty Utilities (Calpeco Electric) LLC, and Pacificcorp	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6128/510465622.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6128/510465622.pdf</a>
CALCCA-01-E	Brian Dickman Justin Kudo	Concurrent Reply Testimony of Brian Dickman and Justin Kudo on Behalf of California Community Choice Association, Errata (Clean Version)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6638/519264515.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2/207005/6638/519264515.pdf</a>



<b>Exh. No.</b>	<b>Sponsor</b>	<b>Description</b>	<b>Web Address of Supporting Document</b>
CEJA-01	Tyson Siegele	Prepared Track A Opening Testimony of Tyson Siegele on Behalf of the California Environmental Justice Alliance in R.23-07-005, The Order Instituting Rulemaking to Advance Demand Flexibility Through Electric Rates	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6637/519264506.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6637/519264506.pdf</a>
CEJA-02	Tyson Siegele	Errata Prepared Track A Reply Testimony of Tyson Siegele on Behalf of the California Environmental Justice Alliance in R.22-07-005, The Order Instituting Rulemaking to Advance Demand Flexibility Through Electric Rates	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6637/519007954.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6637/519007954.pdf</a>
CEJA-03	Tyson Siegele	California Environmental Justice Alliance Comment Excerpts	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6637/519135250.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6637/519135250.pdf</a>
CFORAT-01	Melissa W. Kasnitz	Track A Rebuttal Testimony of Melissa W. Kasnitz on Behalf of Center for Accessible Technology Addressing Policy Issues	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6631/519007919.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6631/519007919.pdf</a>
CFORAT-02	Melissa W. Kasnitz	Center for Accessible Technology Comment Excerpts	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6634/518983232.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6634/518983232.pdf</a>
CESA-01	Richard McCann	Prepared Rebuttal Testimony of Richard McCann on Behalf of the California Energy Storage Alliance	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6653/519776818.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6653/519776818.pdf</a>
CESA-02	Richard McCann	Dr. Richard McCann CV	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6653/519776931.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6653/519776931.pdf</a>
CLC-01	Ben Schwartz	Rebuttal Testimony of Ben Schwartz on Behalf of the Clean Coalition	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6144/510460494.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6144/510460494.pdf</a>
CLC-02	Ben Schwartz	Fixed Charge Public Tool – Clean Coalition Proposal Results	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6627/518901622.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6627/518901622.pdf</a>
CLC-03	Ben Schwartz	Excerpts from the Clean Coalition’s August 21, 2023, Reply Comments on Administrative Law Judge’s Ruling on the Implementation Pathway for Income-Graduated Fixed Charges	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6628/518988958.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6628/518988958.pdf</a>

Exh. No.	Sponsor	Description	Web Address of Supporting Document
Joint IOUs-01-E2	Michael Backstrom Gwendolyn Morien Robert Thomas Colin Kerrigan Rosa Alvarez Claire Coughlan Miriam Fischlein Norma Kane Melanie McCutchan Eva Molnar April Bernhardt Brian Kopec Erika Wasmund Rebecca Madsen Erin Pulgar	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; Joint IOUs' Exhibit 1, addressing: -Policy -Rate Design -Income Verification -Implementation -Marketing -Cost Recovery Errata (Clean)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6666/519777282.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6666/519777282.pdf</a>
Joint IOUs-02-E	Michael Backstrom Colin Kerrigan Gwendolyn Morien Robert Thomas Rosa Alvarez Claire Coughlan Miriam Fischlein Norma Kane Melanie McCutchan Eva Molnar April Bernhardt Brian Kopec Erika Wasmund Rebecca Madsen Erin Pulgar	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; Joint IOUs' Exhibit 1 Appendices; Appendix A – Witness Qualifications; Appendix B – Joint IOU IGFC Proposal Printable Results; Appendix C – Estimated Budgets for the Income Graduated Fixed Charge, Errata (Clean)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6666/519776300.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6666/519776300.pdf</a>

Exh. No.	Sponsor	Description	Web Address of Supporting Document
Joint IOUs-03-E1	Michael Backstrom Colin Kerrigan Gwendolyn Morien Robert Thomas Rosa Alvarez Claire Coughlan Miriam Fischlein Norma Kane Melanie McCutchan Eva Molnar April Bernhardt Brian Kopec Erika Wasmund Rebecca Madsen Erin Pulgar	Joint Reply Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company (the Joint IOUs) Addressing Income-Graduated Fixed Charge Proposals, Errata (Clean)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6666/519776731.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6666/519776731.pdf</a>
Joint IOUs-04	Michael Backstrom Colin Kerrigan Gwendolyn Morien Robert Thomas Rosa Alvarez Claire Coughlan Miriam Fischlein Norma Kane Melanie McCutchan Eva Molnar April Bernhardt Brian Kopec Erika Wasmund Rebecca Madsen Erin Pulgar	Supplemental Testimony of Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company Addressing Income-Graduated Fixed Charge Proposals	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6680/519776665.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6680/519776665.pdf</a>

<b>Exh. No.</b>	<b>Sponsor</b>	<b>Description</b>	<b>Web Address of Supporting Document</b>
Joint IOUs-05	Nathan Chau Otto Nichols Alex Marquez	Cal Advocates Response to SCE Date Request-CalPA-004	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6684/519776783.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6684/519776783.pdf</a>
Joint Stip-01	Various	Joint Stipulation-01 for Track A	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6681/519777337.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6681/519777337.pdf</a>
Liberty-01	Cynthia Fisher	Liberty Utilities Testimony	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5894/505748652.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5894/505748652.pdf</a>
NRDC-TURN-01	NRDC/TURN	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	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519777268.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519777268.pdf</a>
NRDC-TURN-02	NRDC/TURN	Rebuttal 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	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519776169.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519776169.pdf</a>
NRDC-TURN-03	NRDC/TURN	Factual Excerpts from Comments of the Natural Resources Defense Council and the Utility Reform Network on Administrative Law Judge's Ruling on The Implementation Pathway for Income-Graduated Fixed Charges, Filed July 31, 2023	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6671/519776851.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6671/519776851.pdf</a>
NRDC-TURN-04	NRDC/TURN	Factual Excerpts from Reply Comments of the Natural Resources Defense Council and the Utility Reform Network on Administrative Law Judge's Ruling on The Implementation Pathway for Income-Graduated Fixed Charges, Filed August 21, 2023	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6671/519776737.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6671/519776737.pdf</a>
NRDC-TURN-05	NRDC/TURN	SEIA Response to Data Request, TURN-NRDC-01	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519777269.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519777269.pdf</a>

<b>Exh. No.</b>	<b>Sponsor</b>	<b>Description</b>	<b>Web Address of Supporting Document</b>
NRDC-TURN-06	NRDC/TURN	PAO Response to Data Request, TURN-NRDC-01	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519776286.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519776286.pdf</a>
NRDC-TURN-07	NRDC/TURN	CalSSA Response to Data Request, TURN-NRDC-01	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519776499.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519776499.pdf</a>
NRDC-TURN-08	NRDC/TURN	Clean Coalition Response to Data Request, TURN-NRDC-01	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519777270.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6663/519777270.pdf</a>
PAC/100	Robert M. Meredith	Direct Testimony of Robert M. Meredith	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5910/505807861.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5910/505807861.pdf</a>
PG&E-01-E	Colin Kerrigan Melanie McCutchan Erika Wasmund	Pacific Gas and Electric Company, Electric Rates Demand Flexibility Rulemaking, Errata Testimony (Clean Version), PG&E-Specific Implementation of Income Graduated Fixed Charge	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6667/519776621.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6667/519776621.pdf</a>
SC-01E	John D. Wilson	Errata Direct Testimony of John D. Wilson on Behalf of Sierra Club (Clean Version)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5977/507387504.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5977/507387504.pdf</a>
SC-02E	John D. Wilson	Errata Reply Testimony of John D. Wilson on Behalf of Sierra Club (Clean Version)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6420/513347081.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6420/513347081.pdf</a>
SCE-01-E	Robert A. Thomas	Southern California Edison Company's Testimony Describing Its Income-Graduated Fixed Charge Proposal, Errata (Clean Version)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6010/508084940.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6010/508084940.pdf</a>
SCE-02	Eva Molnar	Southern California Edison Company's Testimony Describing Its Income-Graduated Fixed Charge Proposal, Specific Implementation of Income-Graduated Fixed Charge	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5912/505718264.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5912/505718264.pdf</a>
SDGE-01-E	Gwendolyn R. Morien	Prepared Opening Testimony of Gwendolyn R. Morien on Behalf of San Diego Gas & Electric Company, Ch. 1 – Rate Design & Cost Recovery, Errata (Clean Version)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5994/507814159.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5994/507814159.pdf</a>
SDGE-02	Norma Kane	Prepared Opening Testimony of Norma Kane on Behalf of San Diego Gas & Electric Company, Ch. 2 – Implementation	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5900/505807844.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5900/505807844.pdf</a>

<b>Exh. No.</b>	<b>Sponsor</b>	<b>Description</b>	<b>Web Address of Supporting Document</b>
SDGE-03	April Bernhardt	Prepared Opening Testimony of April Bernhardt on Behalf of San Diego Gas & Electric Company, Ch. 3 – Marketing, Education & Outreach	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5900/505736523.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5900/505736523.pdf</a>
SEIA-01	R. Thomas Beach	Prepared Direct Testimony of R. Thomas Beach on behalf of the Solar Energy Industries Association	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/519119856.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/519119856.pdf</a>
SEIA-02	R. Thomas Beach	Prepared Rebuttal Testimony of R. Thomas Beach on behalf of the Solar Energy Industries Association	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/519135217.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/519135217.pdf</a>
SEIA-03	R. Thomas Beach	Prepared Supplemental Testimony of R. Thomas Beach on behalf of the Solar Energy Industries Association	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/518983216.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/518983216.pdf</a>
SEIA-04	R. Thomas Beach	Second Errata to the Prepared Testimony of R. Thomas Beach on behalf of the Solar Energy Industries Association	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/519135218.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/519135218.pdf</a>
SEIA-05	R. Thomas Beach	Second Errata to the Prepared Rebuttal Testimony of R. Thomas Beach on behalf of the Solar Energy Industries Association	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/518998747.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/518998747.pdf</a>
SEIA-06	R. Thomas Beach	The Solar Energy Industries Association Response to TURN/NRDC Data Request #2	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/518936268.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6633/518936268.pdf</a>
UCAN-01	Mark Fulmer	Rebuttal Testimony of Mark Fulmer on Behalf of the Utility Consumers' Action Network Concerning the Establishment of a Residential Income-Graduated Fixed Charge	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6139/510525236.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/6139/510525236.pdf</a>

**PACIFIC GAS AND ELECTRIC COMPANY**

**APPENDIX B**

Rulemaking: 22-07-005  
Exhibit No.: Joint Stip-01  
Date: September 8, 2023  
Witness(es): Various

## JOINT STIPULATIONS-01 FOR TRACK A



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to  
Advance Demand Flexibility Through  
Electric Rates.

Rulemaking 22-07-005

**Joint Stipulation-01 for Track A**

Pursuant to the assigned Administrative Law Judge’s *Ruling Addressing the Track A Procedural Schedule, Opening Briefs Guidance, and Exhibits* (August 22 Ruling),<sup>1</sup> Pacific Gas and Electric Company (PG&E) respectfully submits Joint Stipulation-01 for Track A. The August 22 Ruling states: “Parties should include any stipulations in proposed exhibits. If any stipulations are not included in the Exhibits Motion, parties will file and serve a motion to receive these additional exhibits into evidence.”

As directed by the Assigned Commissioner’s Phase 1 Scoping Memo and Ruling (Scoping Memo), PG&E coordinated “with parties to serve a joint case management statement for Track A” which included a list of stipulated facts.<sup>2</sup> PG&E filed and served the Joint Case Management Statement for Track A on August 11, 2023, which included the procedural background regarding the list of stipulated facts.<sup>3</sup>

Below is a list of stipulated facts from the Joint Case Management Statement filed August 11, 2023. This list does not preclude parties from attempting to garner additional stipulations for submittal through subsequent motions as permitted by the August 22 Ruling.

---

<sup>1</sup> R.22-07-005, Ruling Addressing the Track A Procedural Schedule, Opening Briefs Guidance, and Exhibits (August 22, 2023).

<sup>2</sup> R.22-07-005, Assigned Commissioner’s Phase 1 Scoping Memo and Ruling, p. 6 (November 2, 2022).

<sup>3</sup> Joint Case Management Statement for Track A, pp. 7-p (August 11, 2023).

**Parties to Joint Stipulation-01 as noted in the Joint Case Management Statement:**

- 350 Bay Area
- Bear Valley Electric Service, Inc. (Bear Valley)
- California Community Choice Association (CalCCA)
- California Efficiency + Demand Management Council (The Council)
- California Solar & Storage Association (CALSSA)
- California Environmental Justice Alliance (CEJA)
- California Energy Storage Alliance (CESA)
- California Manufacturers and Technology Association (CMTA)
- Center for Accessible Technology (CforAT)
- Clean Coalition
- Coalition of California Utility Employees (CUE)
- Google Nest
- Grid2.0
- Liberty Utilities (CalPeco Electric) LLC (Liberty)
- Natural Resources Defense Council (NRDC)
- PacifiCorp d/b/a Pacific Power (PacifiCorp)
- PG&E
- Public Advocates Office at the California Public Utilities Commission (Cal Advocates)
- Southern California Electric Company (SCE)
- San Diego Gas & Electric Company (SDG&E)
- Solar Energy Industries Association (SEIA)
- Sierra Club
- The Utility Reform Network (TURN).
- Utility Consumers' Action Network (UCAN)<sup>4</sup>

---

<sup>4</sup> UCAN was unavailable when the stipulations were originally filed in the August 11, 2023 Joint Case Management Statement. Upon review of the *Joint Motion to Admit Exhibits in the Evidentiary Record for Track A* and related appendices on September 7, 2023, UCAN requested PG&E add UCAN as one of the parties to this Joint Stipulation-01.

## **List of Stipulated Facts**

1. Residential volumetric electricity rates in California have long been above the national average and are projected to continue growing over the next decade across the three large investor-owned utilities (IOU).
2. The California legislature passed AB 205 and the Governor signed that bill into law on June 30, 2022, and it was recorded by the Secretary of State on that same day as Chapter 61 of the Statutes of 2022, which amended Section 739.9 of the Public Utilities Code regarding fixed charges for residential customers.
3. The State of California has not conducted any income-graduated fixed charge pilots for electric residential rates.
4. Revenue and Taxation Code Section 19542 prohibits the Franchise Tax Board of California (FTB) from providing personal financial information without taxpayer authorization, and this restriction applies to confirmation of any self-reported income data from the taxpayer.
5. The FTB has a process for taxpayers to authorize disclosure of their data through submission of a form, but this authorization only allows for disclosure of the income of the individual taxpayer, not the entire household.
6. Without additional statutory authorization, the FTB would not be able to verify income information for taxpayers without their written consent.
7. Automatic verification of all customers' incomes through FTB data is not feasible without legislation, and FTB will not have data for all customers.
8. The small and multi-jurisdictional utilities (SMJUs)<sup>5</sup> have significantly fewer customers than the larger IOUs.
9. CARE-exempt charges include the CARE surcharge, the Wildfire Fund charge, the Self-Generation Incentive Program charge, and the Wildfire Hardening Fixed Recovery charge.

---

<sup>5</sup> The SMJUs include Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, and PacifiCorp.