

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



June 4, 2004

Advice Letter 2498-E/2498-E-A

Ms Anita Smith, Rate Analyst  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code 10B  
San Francisco, CA 94177

Subject: Establishment of new Schedule E-FERA, Family Electric Rate Assistance, a balancing account and FERA application forms

Dear Ms Smith:

Advice Letter 2498-E is effective April 26, 2004 and Supplement 2498-E-A is effective June 17, 2004. A copy of the advice letter is returned herewith for your records.

Sincerely,

A handwritten signature in cursive script that reads "Paul Clanon".

Paul Clanon, Director  
Energy Division



**Karen A. Tomcala**  
Vice President  
Regulatory Relations

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June 3, 2004

**Advice 2498-E-A  
(Pacific Gas and Electric Company ID U39E)**

Public Utilities Commission of the State of California

**Subject:** Supplemental to Establish New Schedule E-FERA--Family Electric Rate Assistance, A Family Electric Rate Assistance Balancing Account (FERABA) in the Baseline Balancing Account, and Application for FERA Forms Per Decision 04-02-057

Pacific Gas and Electric Company (PG&E) hereby submits for filing revisions to its electric tariffs. The affected tariff sheets are listed on the enclosed **Attachment I**. This filing supplements Advice 2498-E – Establishment of New Schedule E-FERA—Family Electric Rate Assistance, A Family Electric Rate Assistance Balancing Account (FERABA) in the Baseline Balancing Account and FERA Forms.

**Purpose**

The purpose of this supplemental advice letter is to make certain clarifying revisions to the new Schedule E-FERA filed in Advice 2498-E, as discussed below. PG&E does not seek any revisions to the FERABA balancing account or FERA customer enrollment forms in this supplemental advice letter, but modifies Electric Preliminary Statement Part CG – Utility Generation Balancing Account.

**Medical Baseline**

The Western Manufactured Housing Community Association (WMA) filed a May 11, 2004 protest to Advice 2498-E that correctly assumed medical baseline participants were not eligible to participate in the FERA program. PG&E's May 18, 2004 protest response corroborated WMA's assumption, attached a revised Schedule E-FERA tariff sheet, and indicated that PG&E would address this issue in a supplemental advice letter. In Attachment I, PG&E has modified Special Condition 2, Eligibility, of Schedule E-FERA, to indicate medical baseline program participants are not eligible to participate in the FERA program.

## **FERA For Master-Metered Customers**

WMA's protest also sought clarification on how the utility would bill a master-metered account to reflect submetered FERA participants. Schedule E-FERA in Attachment I specifies the methodology for prorating and discounting Tier 3 usage to appropriately reflect FERA, CARE, and medical baseline participation by the submetered tenants. PG&E has slightly modified this from the version PG&E filed in its protest response to delete an internal billing system validity check not necessary for tariff purposes.

## **FERA Reporting Requirements**

PG&E indicated in Advice 2498-E that several parties were working to finalize an agreement regarding FERA reporting requirements. **Attachment II** provides the resulting document setting forth the agreed upon FERA reporting requirements. These final FERA reporting requirements were developed jointly by the utilities, ORA, Energy Division, Latino Issues Forum, and TURN.

## **Transitional Bundled Service**

Transitional Bundled Service (TBS) customers migrating between bundled and Direct Access rates are not eligible to participate in the FERA program. TBS customers pay short-term commodity prices as set forth in Schedule TBCC rather than the regular Tier 3 rates that are waived under the FERA program.

## **Schedule EM**

PG&E inadvertently listed Schedule EM as eligible to participate in the FERA program. However, just as Schedule EM is not eligible for the CARE program,<sup>1</sup> Schedule EM should not be eligible for the FERA program, because there is no way to ensure that the master-metered customer will pass the FERA discount through to non-submetered tenants. Schedule EM is eligible for CARE only in the situation of non-profit group living facilities where 100 percent of the residents individually meet CARE income guidelines. However, non-profit group living discounts have not been extended to the FERA program. Thus, Schedule EM is not eligible to participate in the FERA program.

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<sup>1</sup> D.89-07-062 initiated the CARE program eligibility criteria, application, and certification procedures. The CARE program was originally termed the LIRA (Low-Income Rate Assistance) program. D.89-07-062 excluded non-submetered tenants from participating in the LIRA program: "Where consumers are not submetered, their energy bill and rent are bundled together. It would be extremely difficult to estimate usage and enforce the pass through of a rate discount. These end-users are not customers of the utility, there is no individual energy bill, and no party submitted a proposal that would ensure that these end-users would receive any benefit. Thus, we will extend this program of assistance only to eligible submetered customers." (32 CPUC 2d, p. 346.)

### **Experimental Schedules E-2 and E-3**

Experimental residential time-of-use (TOU) Schedule E-2, and experimental Critical Peak Pricing Program Schedule E-3, should not be eligible to participate in the FERA program. PG&E inadvertently listed these rate schedules as eligible in Advice 2498-E. These experimental or pilot programs adopted in D. 03-03-036 in Advanced Metering OIR 02-06-001 measure customer response to price signals, and the FERA program would undermine Schedule E-2 and E-3 program analysis and objectives.

### **Energy Resource Recovery Account**

PG&E observed that in their respective FERA advice letters both San Diego Gas and Electric Company (SDG&E) and Southern California Edison (SCE) made entries to their Energy Resource Recovery Account (ERRA), with SCE also posting an entry to its Native Load Balancing Account (NLBA), to account for FERA related revenue shortfalls. Upon review, PG&E's balancing accounts should similarly be revised to ensure that FERA commodity shortfalls are not inadvertently collected, or collected from the wrong customer classes, prior to the time at which the Commission decides how to allocate FERA commodity shortfall costs among the customer classes. In PG&E's case, the Utility Generation Balancing Account (UGBA) in Preliminary Statement Part CG in Attachment I has been modified accordingly.

### **Tariff Revisions**

The revisions discussed above are included in the revised tariff sheet for Schedule E-FERA and Electric Preliminary Statement Part CG – Utility Generation Balancing Account, provided in Attachment I.

### **Protests**

Anyone wishing to protest this filing may do so by sending a letter by **June 23, 2004**, which is 20 days from the date of this filing. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. Protests should be mailed to:

IMC Branch Chief – Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: [jjr@cpuc.ca.gov](mailto:jjr@cpuc.ca.gov)

Protests also should be sent by e-mail and facsimile to Mr. Jerry Royer, Energy Division, as shown above, and by U.S. mail to Mr. Royer at the above address.

The protest should be sent via both e-mail and facsimile to PG&E on the same date it is mailed or delivered to the Commission at the address shown below.

Pacific Gas and Electric Company  
Attention: Brian Cherry  
Director, Regulatory Relations  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-7226  
E-mail: [RxDd@pge.com](mailto:RxDd@pge.com)

### **Effective Date**

**PG&E requests an effective date of June 17, 2004 for the attached Schedule E-FERA and the attached Preliminary Statement Part CG, but April 26, 2004 for all other tariff revisions filed in Advice 2498-E.**

### **Notice**

In accordance with General Order 96-A, Section III, Paragraph G, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list for Rulemaking (R.) 01-05-047. Address changes should be directed to Sharon Tatai at (415) 973-2788. Advice letter filings can also be accessed electronically at:

<http://www.pge.com/tariffs>

*Karen A. Somcala*  
*AWS*

Vice President - Regulatory Relations

### Attachments

cc: Service List – R. 01-05-047

**Attachment I  
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Advice 2498-E-A**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
21640-E	Electric Preliminary Statement – CG–Utility Generation Balancing Account	21490-E
21641-E	Electric Rate Schedule E-FERA –Family Electric Rate Assistance (Cont'd)	New
21642-E	Electric Rate Schedule E-FERA – Family Electric Rate Assistance (Cont'd)	New
21643-E	Electric Rate Schedule E-FERA – Family Electric Rate Assistance	New
21644-E	Table of Contents – Preliminary Statements	21474-E
21645-E	Table of Contents – Rate Schedules	21629-E



**PRELIMINARY STATEMENT**  
(Continued)

**CG. UTILITY GENERATION BALANCING ACCOUNT (UGBA)**

1. **PURPOSE:** The purpose of the Utility Generation Balancing Account (UGBA) is to record and recover the authorized revenue requirements associated with PG&E-owned generation, including capital and related non-fuel operating and maintenance expenses. Until generation rates reflect the 2004 authorized revenue requirement consistent with the 2004 UGBA revenue requirements underlying the rate reduction adopted in D.04-02-062. PG&E will reduce UGBA revenue, by the amount of imputed revenues in the Distribution Revenue Adjustment Mechanism, Public Purpose Programs Revenue Adjustment Mechanism and Nuclear Decommissioning Adjustment Mechanism, to mitigate a large overcollection in the UGBA.
2. **APPLICABILITY:** The Utility Generation Balancing Account (UGBA) shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATES:** Disposition of amounts in the UGBA shall be as determined in the Electric Annual True-up Proceeding or any other proceedings authorized by the Commission.
4. **GENERATION RATES:** The generation rates are included in the effective rates set forth in each rate schedule.
5. **ACCOUNTING PROCEDURES:** The CPUC jurisdictional portion of all entries shall be made at the end of each month as follows:
  - a. A credit entry equal to the revenue from the generation rates less the recorded revenues from the: (1) Energy Resource Recovery Account (as defined in Part I of PG&E's electric Preliminary Statement (PS)), (2) DWR Power Charge Balancing Account (as defined in Part I of PG&E's electric PS), (3) Regulatory Asset Revenue Adjustment Mechanism (as defined in Part I of PG&E's electric PS), (4) Modified Transition Cost Balancing Account (as defined in Part I of PG&E's electric PS); (5) Regulatory Asset Tax Balancing Account (as defined in Part I of PG&E's electric PS); (6) Headroom Account (as defined in Part I of PG&E's electric PS); (7) Procurement Transactions Auditing Account (as defined in Part I of PG&E's electric PS); and (8) DWR Franchise Fees and Uncollectibles (as defined in Part I of PG&E's electric PS);
  - b. A credit entry equal to the Family Electric Rate Assistance (FERA) revenue shortfall. The corresponding debit entry is defined in PG&E's electric Preliminary Statement Part CE, item 5.d.1.; (N)  
|  
(N)
  - c. A debit entry equal to the sum of entry 5.e. in the Distribution Revenue Adjustment Mechanism, entry 5.c. in the Public Purpose Program Revenue Adjustment Mechanism, and entry 5.c. in the Nuclear Decommissioning Adjustment Mechanism; (T)
  - d. A debit entry equal to the annual authorized revenue requirements associated with PG&E's owned generation divided by twelve; (T)
  - e. A credit entry equal to one-twelfth of the adopted annual on going CTC portion of PG&E's revenue requirement associated with PG&E's owned generation for serving the Western Area Power Authority (WAPA) load; and (T)
  - f. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H-15 or its successor. (T)



SCHEDULE E-FERA—FAMILY ELECTRIC RATE ASSISTANCE

(N)

**APPLICABILITY:** This schedule is applicable to single-phase and polyphase residential bundled service in single-family dwellings and in flats and apartments separately metered by PG&E and domestic submetered tenants residing in multifamily accommodations, mobilehome parks and to qualifying recreational vehicle parks and marinas and to farm service on the premises operated by the person who's residence is supplied through the same meter where the applicant qualified for Family Electric Rate Assistance (FERA) under the eligibility and certification criteria set forth below in Special Conditions 2 and 3.

All individually meter customers and submetered tenants must have a maximum annual household income of between 175% and 250% of federal poverty guidelines and have 3 or more persons residing full time in their household for that household to receive benefit of Schedule E-FERA.

**TERRITORY:** The entire territory served.

**RATES:** The rate of the customer's otherwise applicable rate schedule; E-1, E-7, E-A7, E-8, E-9 and E-NET will apply except that all Tier 3 baseline usage will be billed at Tier 2 baseline rates. These conditions also apply to master-metered customers and to qualified sub-metered tenants where the master-meter customer is served under PG&E's Rate Schedule ES, ESL, ESR, ESRL, ET, or ETL.

For master-metered customers, the FERA discount is equal to the Tier 3 usage assigned to non-CARE and non-medical units on a prorated basis times the difference between Tier 2 and Tier 3 rates multiplied by the number of FERA units divided by the sum of the number of non-CARE and non-medical units.

**SPECIAL CONDITIONS:**

1. **OTHERWISE APPLICABLE SCHEDULE:** The Special Conditions of the Customer's otherwise applicable rate schedule will apply to this schedule.
2. **ELGIBILITY:** To be eligible to receive E-FERA the applicant must qualify under the criteria set forth below and meet the certification requirements thereof to the satisfaction of PG&E. Applicants may qualify for E-FERA at their primary residence only. Customers or sub-metered tenants participating in the California Alternate Rates for Energy (CARE) program or medical baseline program cannot concurrently participate in the FERA program. Master-metered customers without sub-metering on Schedule EM are ineligible to participate in the FERA program. In addition, non-residential customers taking service on Schedule E-CARE are categorically ineligible to take service on Schedule E-FERA. Direct Access and Transitional Bundled Service customers are also ineligible to take service on Schedule E-FERA. Customers on experimental residential Schedules E-2 and E-3 are also ineligible to participate in the FERA program.

(N)

(Continued)





SCHEDULE E-FERA—FAMILY ELECTRIC RATE ASSISTANCE  
(Continued)

(N)

SPECIAL  
CONDITIONS:  
(Cont'd.)

4. RECERTIFICATION REQUIREMENTS

Certification of individually-metered PG&E Customers is valid for a period of two years, except as provided in Section 5.

Certification of submetered tenants of master-metered customers is valid for one year, except as provided in Section 5.

Applicants either suspected of or proven to have provided incorrect information in their application for E-FERA may be required to recertify at any time. Further, PG&E reserves the right to conduct random audits to determine applicants' eligibility. Failure by any party asked to provide proper proof of eligibility will result in disqualification of applicant's eligibility to receive the E-FERA rate. PG&E may rebill Customers removed from the program for previous discounts received for which the participant did not qualify.

Upon PG&E's request that the applicant recertify eligibility following the regular expiration date of applicants' eligibility, the applicant will have 60 days to recertify, after which applicants not recertified will lose their eligibility under the E-FERA program.

It is the responsibility of the applicant to immediately notify PG&E when they are no longer eligible for the E-FERA program

Where residential dwelling units are not individually metered by PG&E and where the qualifying E-FERA applicants are not PG&E's customers of record, PG&E will perform annual audits to determine if the qualifying applicants still reside at the premises receiving E-FERA. Then PG&E will either (a) allow E-FERA to remain in effect until recertification in accordance with Section 4 above, or (b) remove the customers of record from E-FERA effective with their next regular meter reading dates.

5. MISAPPLICATION OF E-FERA

Certification for eligibility for the E-FERA program that is made based upon incorrect information provided by the applicant shall constitute misapplication of E-FERA for the period under which the applicant received E-FERA. PG&E may rebill the account at the customer's/applicant's otherwise-applicable rate schedule for misapplication of E-FERA. Such billing shall be for a period up to the most recent three years in accordance with Rule 17.1. However, nothing in this schedule shall be interpreted as limiting PG&E's rights under any provisions of any applicable law or tariff.

Master-metered customers with PG&E-certified submetered tenants shall not be held responsible for incorrect information provided by the submetered tenant to PG&E.

(N)



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**FIRST ANNUAL PROGRESS REPORT TO THE  
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**FAMILY ELECTRIC RATE ASSISTANCE  
(FERA)**

**JANUARY 1, 2004 - DECEMBER 31, 2004**

**PACIFIC GAS AND ELECTRIC COMPANY  
FERA PROGRAM  
MAIL CODE H14F  
PO BOX 770000  
SAN FRANCISCO, CA 94177**

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**FERA PROGRAM**

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## FAMILY ELECTRIC RATE ASSISTANCE (FERA)

### I. PARTICIPANT INFORMATION

A. Provide the total number of FERA customers by month, for the reporting period.

ANS. See Table 1.

<b>Table 1</b>		
<b>2004</b>	<b>FERA Enrolled<sup>1</sup></b>	<b>FERA Receiving Tier 3 Benefit<sup>1</sup></b>
<b>January</b>		
<b>February</b>		
<b>March</b>		
<b>April</b>		
<b>May</b>		
<b>June</b>		
<b>July</b>		
<b>August</b>		
<b>September</b>		
<b>October</b>		
<b>November</b>		
<b>December</b>		

Notes:

<sup>1</sup>Does not include sub-metered tenants.

**B. Provide the total number of FERA-eligible households, FERA-participating households, and FERA household penetration rates by quarter.**

ANS. See Table 2.

<b>Table 2</b>			
<b>FERA Penetration Rate</b>			
<b>2004 Quarter Ending</b>	<b>FERA-Eligible Households<sup>1</sup></b>	<b>FERA-Participating Households<sup>1</sup></b>	<b>FERA Household Penetration Rate<sup>2</sup></b>
March 31	Not applicable.	Not applicable.	Not applicable.
June 30			
September 30			
December 31			

Notes:

<sup>1</sup>Does not include sub-metered tenants.

<sup>2</sup>FERA Household Penetration Rate is calculated by dividing FERA Participating Households by FERA-Eligible Households.

**C. Discuss how the estimates of current FERA-eligible households were developed.**

ANS.

**D. Provide the current FERA sub-metered tenant counts at year-end.**

ANS.

**E. Discuss any problems encountered during the reporting period administering the FERA program for sub-metered tenants and/or master-meter customers.**

ANS.

## II. PROGRAM COSTS

### A. Discount Cost

- 1. State the average monthly FERA discount received, in dollars per FERA customer<sup>1,2</sup>.**

Notes:

<sup>1</sup>Does not include sub-metered tenants.

<sup>2</sup>Does include all enrolled customers who have received a discount in any month.

ANS.

- 2. State the cumulative annual discount for all FERA customers<sup>1</sup>.**

Notes:

<sup>1</sup>Does not include sub-metered tenants.

ANS.

**B. Administrative Cost**

**1. Show the FERA Program's administrative cost by category.**

ANS. See Table 4

<b>Table 4</b>	
<b>FERA Program Administrative Costs by Category and Benefits</b>	
<b>Category</b>	<b>Cost</b>
<b>Outreach</b>	\$
<b>Processing, Certification, and Verification</b>	
<b>General Administration</b>	
<b>Startup</b>	
<b>TOTAL PROGRAM COSTS</b>	
<b>CUSTOMER BENEFITS</b>	
<b>TOTAL PROGRAM COSTS &amp; CUSTOMER BENEFITS</b>	\$

**2. Explain what is included in each administrative cost category.**

ANS. See table below.

<b>Category</b>	<b>Description</b>
<b>Outreach</b>	Includes: Bill inserts, advertising, applications (printing and mailing), posters, brochures, flyers, postage, and other outreach, information technology (technical support and software licensing), staff labor, out bound dialing, 800#, outreach pilots, and Capitation Fee Project.
<b>Processing, Certification, and Verification</b>	Includes: Staff labor, information technology (technical support and software licensing), application processing, training, programming labor, and sub-meter certification.
<b>General Administration</b>	Includes: <b>Billing System /Programming</b> Manual rebilling and programming and billing labor  <b>Regulatory Compliance</b> Applications, advice filings, comments and reply comments, hearings, reports and studies, working group meetings, public input meetings, and tariff revisions.  <b>Other</b> Office supplies, market research, program management labor (including pensions and benefits), and information technology (technical support and software licensing).
<b>Startup</b>	Includes: Labor and system programming to implement the program
<b>Benefits</b>	Includes: Rate discounts.

**3. Explain how costs of joint CARE/FERA activities are charged to each program.**

ANS.

**C. Provide the year-end December 31 balances for the FERA balancing account for both the current and prior reporting periods.**

ANS.

### III. OUTREACH

- A. Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.**

ANS.

- B. Discuss each of the following:**

- 1. How FERA customer data and other relevant program information is shared within the utility, for example, between its LIEE and other appropriate low-income programs.**

ANS.

- 2. Discuss barriers to participation encountered during the reporting period and steps taken to mitigate them.**

ANS.

#### IV. PROCESSING FERA APPLICATIONS

##### A. Processing Self-Certification and Self-Recertification Applications (individual and sub-metered customers)

1. Provide the number of utility and third-party FERA self-certification and self-recertification applications provided, received, approved, denied, pending/never completed, or duplicates for the reporting period.

ANS. See Table 5.

TABLE 5						
FERA Self-Certification and Self-Recertification Applications <sup>1</sup>						
	Provided	Received	Approved	Denied	Pending/Never Completed	Duplicates
Utility						
Capitation						
Other Third-Party						
Total						

Notes:

<sup>1</sup>Includes sub-metered tenants.

##### B. Processing Random Post-Enrollment Verification Requests

1. Provide the total number of verifications requested, received, approved, denied, pending/never completed, or duplicates, for the reporting period.

ANS. See Table 6.

TABLE 6						
FERA Random Post-Enrollment Verification Requests <sup>1</sup>						
	Requested	Received	Approved	Denied	Pending/Never Completed	Duplicates
Total						

Notes:

<sup>1</sup>Verification process for FERA is the same as CARE.

## V. PROGRAM MANAGEMENT

- A. Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.**

ANS.

**PG&E Electric Advice Filing List  
General Order 96-A, Section III(G)**

ABAG Power Pool	Duncan, Virgil E.	Sempra Energy
Aglet Consumer Alliance	Dutcher, John	Sequoia Union HS Dist
Agnews Developmental Center	Dynegy Inc.	SESCO
Ahmed, Ali	Ellison Schneider	Sierra Pacific Power Company
Alcantar & Elsesser	Energy Law Group LLP	Silicon Valley Power
Anderson Donovan & Poole P.C.	Enron Energy Services	Simpson Paper Company
Applied Power Technologies	Exeter Associates	Smurfit Stone Container Corp
APS Energy Services Co Inc	Foster, Wheeler, Martinez	Southern California Edison
Arter & Hadden LLP	Franciscan Mobilehome	SPURR
Avista Corp	Future Resources Associates, Inc	St. Paul Assoc
Barkovich & Yap, Inc.	GLJ Energy Publications	Stanford University
BART	Goodin, MacBride, Squeri, Schlotz &	Sutherland, Asbill & Brennan
Bartle Wells Associates	Gruneich Resource Advocates	Tabors Caramanis & Associates
Blue Ridge Gas	Hanna & Morton	Tansev and Associates
Bohannon Development Co	Heeg, Peggy A.	Tecogen, Inc
BP Energy Company	Hogan Manufacturing, Inc	TFS Energy
Braun & Associates	House, Lon	TJ Cross Engineers
C & H Sugar Co.	Imperial Irrigation District	Transwestern Pipeline Co
CA Bldg Industry Association	Integrated Utility Consulting Group	Turlock Irrigation District
CA Cotton Ginners & Growers Assoc.	International Power Technology	United Cogen Inc.
CA League of Food Processors	J. R. Wood, Inc	URM Groups
CA Water Service Group	JTM, Inc	Utility Cost Management LLC
California Energy Commission	Kaiser Cement Corp	Utility Resource Network
California Farm Bureau Federation	Korea Elec Power Corp	Wellhead Electric Company
California ISO	Marcus, David	Western Hub Properties, LLC
Calpine	Masonite Corporation	White & Case
Calpine Corp	Matthew V. Brady & Associates	WMA
Calpine Gilroy Cogen	Maynor, Donald H.	
Cambridge Energy Research Assoc	McKenzie & Assoc	
Cameron McKenna	McKenzie & Associates	
Cardinal Cogen	Meek, Daniel W.	
Cellnet Data Systems	Mirant California, LLC	
Childress, David A.	Modesto Irrigation Dist	
City of Glendale	Morrison & Foerster	
City of Healdsburg	Morse Richard Weisenmiller & Assoc.	
City of Palo Alto	New United Motor Mfg, Inc	
City of Redding	Norris & Wong Associates	
CLECA Law Office	North Coast Solar Resources	
Constellation New Energy	Northern California Power Agency	
CPUC	PG&E National Energy Group	
Creative Technology	Pinnacle CNG Company	
Crossborder Inc	PPL EnergyPlus, LLC	
CSC Energy Services	Price, Roy	
Davis, Wright Tremaine LLP	Product Development Dept	
Davis, Wright, Tremaine, LLP	Provost Pritchard	
Defense Fuel Support Center	R. M. Hairston & Company	
Department of the Army	R. W. Beck & Associates	
Department of Water & Power City	Recon Research	
Dept of the Air Force	Regional Cogeneration Service	
DGS Natural Gas Services	RMC Lonestar	
DMM Customer Services	Sacramento Municipal Utility District	
Downey, Brand, Seymour & Rohwer	SCD Energy Solutions	
Duke Energy	Seattle City Light	
Duke Energy North America	Sempra	