

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



September 13, 2004

Advice Letter 2523-E

Rose de la Torre  
Pacific Gas & Electric  
77 Beale Street, Room 1088  
Mail Code B10C  
San Francisco, CA 94105

Subject: Adoption of summer demand reduction programs

Dear Ms Smith:

Advice Letter 2523-E is effective July 8, 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

77 Beale Street, Room 1065  
San Francisco, CA 94105

*Mailing Address*  
Mail Code B10A  
P.O. Box 770000  
San Francisco, CA 94177

415.972.5209  
Internal: 222.5209  
Fax: 415.972.5625  
Internet: KAT5@pge.com

June 14, 2004

**Advice 2523-E  
(Pacific Gas and Electric Company ID U 39 E)**

Public Utilities Commission of the State of California

**Subject: Proposal of Pacific Gas and Electric Company for Adoption of  
Summer Demand Reduction Programs**

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.

**Purpose**

In response to an Assigned Commissioner's Ruling dated June 4, 2004 (the "ACR"), in Rulemaking (R.) 02-06-001, this advice letter requests approval of two new programs to achieve demand reduction during the summer of 2004. The ACR expresses concern "about the possibility of supply shortages this summer." To address this concern, PG&E proposes acceleration of two programs it has been planning for rollout in the summer of 2005. These new programs will augment those PG&E already has in place as well as promote implementation of the Energy Action Plan's preferred loading order, to which PG&E is committed. They will also provide an additional margin of safety to address the possibility that, contrary to industry expectations, extreme conditions converge to create supply shortages this summer.

In its April 1, 2004, filing in R.02-06-001,<sup>1</sup> PG&E suggested several new demand response programs. These program ideas stemmed from focus group feedback on demand response as a whole, and PG&E programs in particular. Although PG&E suggested, at the time, that these programs be vetted in the AMI working group process for rollout in the summer of 2005, it is willing to move forward this summer in response to the concerns raised in the ACR. Implementing these programs now will serve two purposes. First, they will provide a start on the

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<sup>1</sup> "Plan of Pacific Gas and Electric Company Regarding Modifications to Demand Response Programs for 2004 and New Programs for 2005."

development on a long-term integrated plan consistent with California's Energy Action Plan. Second, they will provide additional operational insurance for 2004 in the event that energy supplies become critical.

Specifically, PG&E proposes:

- Implementing a new demand response program called "E-SAVE" targeted to Commercial/Industrial customers with demands over 200 kilowatt (kW). It is a program that is closely based on the "No-Bid" Demand Response Program proposed for 2005 in PG&E's April 1, 2004 demand response plan filed in R. 02-06-001 and would provide a rebate to medium and large customers who reduce their peak loads by 20 percent on days when the forecast price of power is \$0.20/kilowatt-hour (kWh) or higher.
- Implementing a grassroots "Power Down" program, which, in concert with the State's "Flex Your Power" program, will encourage customers, in a targeted manner to optimize message effectiveness, to reduce energy consumption at key times. Expanding PG&E's and other outreach programs will reinforce with customers the wide range of programs available that can help them do their part to reduce energy consumption.

### **Background**

The ACR invited the three utility respondents in R. 02-06-001 to submit advice letters within five business days of the ruling, or by June 14, 2004, to implement programs that achieve demand response through Advanced Load Control and expansion of Smart Thermostat programs. PG&E does not currently offer such programs, nor could it create the infrastructure to support these types of programs in time to impact summer 2004 demand. PG&E, however, respects the concerns expressed in the ACR and believes the new programs proposed in this Advice Letter will, in conjunction with those already in place, significantly contribute to averting any realization of those concerns.

PG&E is committed to leading California's effort to develop a diversified, environmentally friendly electric resource portfolio, and in delivering safe, reliable energy service at stable, competitive prices. PG&E supports building a diversified portfolio that gives first preference to cost-effective energy efficiency and demand response programs, environmentally sustainable emerging technologies and renewable projects.

Since demand reduction programs are a key element of PG&E's diversified portfolio approach, PG&E has engaged in extensive efforts to foster those programs and it will continue to do so in the future. PG&E aggressively promotes conservation with its customers as conservation plays a key role in making sure the state has enough power to meet customers' demand. Energy

efficiency is equally important as it reduces the need for new sources of power for the future.

For the past 28 years, PG&E has offered its customers energy efficiency incentive and rebate programs. In 2003, the energy savings from energy efficient measures totaled 549 million kWh. In 2004, PG&E will offer \$258 million in energy efficiency rebates for residential, business, new construction and training programs. The programs include rebates for energy efficient household products, energy audits for businesses, and restaurant appliance efficiency. PG&E has already committed or spent all 2004 rebate funding for most residential retrofit and lighting measures, and has separately requested additional funding flexibility from the CPUC to meet the unmet customer demand for these measures.<sup>2</sup> In addition, PG&E's demand reduction programs have obtained commitments to reduce peak demand by about 300 MW. PG&E is continuing to obtain additional commitments to further reduce peak demand. For the summer of 2004, PG&E proposes the additional measures requested in this Advice Letter to further help customers manage their energy consumption.

For the longer term, PG&E will continue to work with stakeholders to evaluate the opportunities for deploying advanced metering (AMI) and other technologies that can facilitate energy and demand reduction. In particular, PG&E is moving forward as rapidly as possible to develop and complete its AMI business case analysis. In conjunction with that work PG&E will also continue to explore how related applications such as air-conditioning cycling programs can work in tandem with advanced technologies to realize additional benefits for customers. In the interim, however, PG&E will continue its demand reduction efforts outlined above.

PG&E has undertaken a resource strategy to meet its customers' needs plus planning reserve requirements for this summer through a combination of owned resources and contracted for resources and energy efficiency and demand reduction programs. PG&E anticipates that there will be sufficient resources to meet anticipated customer demand under CPUC-adopted planning standards and capacity reserves requirements as well as under certain higher demand scenarios. According to the California Energy Commission's (CEC) assessment for summer 2004, which the ACR references, supplies are expected to be adequate under normal weather conditions. However, the CEC assessment also notes that under 1-in-10 year temperatures, "statewide projected operating

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<sup>2</sup> On March 25, 2004, PG&E filed a petition for modification of the decisions authorizing energy efficiency expenditures for the period 2004-2005. (D.03-12-060 and D.04-02-059). In that petition, PG&E described how public demand for the residential retrofit rebate program exceeded budgeted amounts by approximately \$4.7 million at the end of 2003; how PG&E had requested authorization in February 2004 to use uncommitted, unspent energy efficiency funds from prior periods to cover this amount, and how the Commission denied that request and instead ordered PG&E to use its 2004 energy efficiency budget to pay for those 2003 expenditures. This reduced the funds available for 2004 residential retrofit rebates. Responses to the petition for modification were filed, and the matter awaits disposition by the Commission.

reserves may drop as low as 4.8%.”<sup>3</sup> Under these circumstances, voluntary conservation programs, interruptible-load programs and other emergency response programs will be critical to avoiding actual blackouts. The new programs sought through this Advice Letter will augment and strengthen these existing measures and provide an additional margin of security.

### **Description of Proposed Electric Rate Schedule E-SAVE (Voluntary Reduction Incentive Program)**

PG&E proposes that its “no-bid” program, which was conceptually described in its April 1<sup>st</sup> filing, be implemented beginning July 1, 2004. Officially, it would be called the “Voluntary Reduction Incentive Program” or electric Rate Schedule E-SAVE. PG&E believes the program will be attractive to business customers with significant electric usage but with limited time and resources to devote to demand reduction, because the program is straightforward and simple for them to implement. Many business customers do not have the personnel in place to track and bid into demand response programs. If a business were to hire an energy manager, or even reallocate its existing personnel resources to analyze energy prices and exchange information with the utilities, the programs became unattractive, and not cost effective to businesses. This is true even though there is “no risk” in participation. The E-SAVE program is designed to overcome these potential obstacles to business customer participation in peak demand reduction efforts.

The program works somewhat like a “bidding” program, except that customers would not be required to bid to receive an incentive payment. Instead, they would simply curtail when asked. The utility would send notification to each customer for a “next day” event when it forecasts a price per kilowatt-hour of \$0.20 or more. It would be up to the customer whether to participate in the event or not. If the customer reduces its energy usage by 20 percent over the duration of the event, the customer would receive a \$0.20 cent credit on its bill for each kWh reduced during that time. Of course, by reducing overall usage, the customers could also achieve additional savings in their energy bills. As in PG&E’s bidding program electric Rate Schedule E-DBP (Demand Bidding Program), the 20 percent reduction would be measured against the customer’s 10-day “baseline.” Each participant would be required to have an interval meter. For those participants lacking such meters, PG&E proposes to provide the meter at no cost to the customer and book the cost instead to costs of the program to be recovered as discussed below.

The E-SAVE program is only available to PG&E bundled service customers, with minor exceptions, with demands of greater than 200kW.

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<sup>3</sup> See California’s Summer 2004 Electricity Supply and Demand Outlook, Final Staff Report, California Energy Commission, June 2004, p. 1.

PG&E estimates the program will cost approximately \$220,000 for 2004. The costs would include an estimated \$80,000 in customer incentive credits and an estimated \$140,000 in incremental administrative costs. PG&E anticipates E-SAVE could achieve a peak demand reduction of 20 megawatt (MW) or greater.

### **Description of "Power Down" Program**

The second of PG&E's two proposed new programs is the "Power Down" program. In concert with the State's "Flex Your Power" program, Power Down will encourage customers to reduce energy consumption during critical summer peak periods. PG&E believes that voluntary conservation will play a critical role in managing tight energy supplies in the future. For example, studies by NRDC and others of customer behavior during the energy crisis have credited voluntary conservation with saving thousands of MW of on-peak load.

Currently, PG&E joins Flex Your Power in conducting both summer and winter media and advertising campaigns to remind customers about energy efficiency and conservation. While these broader messages are delivered each season, PG&E proposes to further focus its outreach efforts by working with Flex Your Power and other key stakeholders to test and develop a grassroots campaign called "Power Down" that is modeled after the "Spare the Air" statewide air pollution campaign.

The primary goal of "Power Down" is to reduce peak usage during those targeted summer days when the state has heightened supply/demand balance concerns. Just as other demand response programs are focused on a few key days, "Power Down" would be a targeted subset of the current broader conservation messaging.

PG&E proposes to use the following strategies in creating "Power Down":

- Model "Power Down" after the successful "Spare the Air" campaign;
- Partner with Flex Your Power to develop and launch a grassroots media campaign with other key stakeholders, including government entities and customer groups;
- Issue "Power Down" press releases when the California Independent System Operator (CAISO) declares tight supplies;
- Provide targeted messages to customers on those days regarding ways to reduce peak usage and save money;
- Provide targeted marketing of peak reducing rebate measures (assuming more funding is allocated for 2004 rebate measures);
- Issue summer conservation media packets to reporters throughout PG&E's service area (300 packets);

The key messages the "Power Down" program will communicate are:

- While the CAISO has said that electric reserves should be adequate under normal conditions this summer, it says adverse conditions could shrink electricity reserves, possibility resulting in power emergencies.
- The CEC's California Summer 2004 Electricity Supply and Demand Outlook report indicates a need for close monitoring and prudent use of electricity resources, particularly during periods of hotter than normal summer temperatures.
- Customers can play a significant part in ensuring adequate electricity this summer by doing their part in participating in the "Power Down" campaign when supplies are predicted to be tight.

PG&E is requesting \$2 million to work with Flex Your Power and the Energy Coalition on developing and launching this campaign. Concurrently, PG&E will continue to run its conservation ads throughout the summer.

### **Proposed Implementation**

PG&E will begin implementing the new programs immediately upon Commission authorization.

### **Program Cost Recovery**

PG&E proposes the following cost recovery mechanisms for the costs incurred in implementing the two new programs. PG&E seeks confirmation that (1) these mechanisms are appropriate, and (2) that reasonable amounts spent in implementation of these programs are recoverable in rates.

### **Operating and Maintenance (O&M) and Administrative and General (A&G) Expenses**

PG&E will incur incremental O&M and A&G costs to implement the programs proposed in this Advice Letter. PG&E proposes that these costs be recorded and recovered via PG&E's Advanced Metering and Demand Response Account (AMDRA) mechanism established in Decision (D.) 03-03-036. With respect to the E-SAVE program, the costs of the incentive credit will be recovered as described below under "Revenue Shortfalls."

PG&E seeks approval to reallocate to these two new programs unspent funds, as needed, that were previously earmarked by the Commission for other large customer programs in R. 02-06-001. In D.03-03-036 the Commission approved specific funding caps for various demand response programs proposed by PG&E. This funding allows for recovery of incremental Program and Administration Costs, Transitional "Technical" and Operational Incentives Costs and Capital Costs (as appropriate) for PG&E's Critical Peak Pricing, Demand Bid and CPA Demand Response Programs. These costs are outlined in Attachment

B of that decision. The total anticipated unspent amounts for PG&E in these categories through 2004 is approximately \$ 6 million, which is more than sufficient to fund the two programs being proposed in this Advice Letter.

In its April 1, 2004 filing, PG&E requested that the Commission approve reallocation of these amounts to assist funding incremental costs associated with the development of new programs for the summer of 2005. The June 2, 2004 ALJ Ruling adopting programs proposed in the April 1st filing was silent on this issue. PG&E therefore renews its request and further specifically requests that these funds be allowed to be used for these two programs this summer.

Alternatively, if PG&E is not authorized to use previously approved funding for these programs, PG&E requests that a new section be added to PG&E's Electric Preliminary Statement CS *Advanced Metering and Demand Response Account*, as described in Attachment I.

### **Revenue Shortfalls**

The revenue shortfalls created by rebating to customers a portion of their electric bill will be accounted for through PG&E's UGBA (Utility Generation Balancing Account),<sup>4</sup> the regular revenue adjustment mechanism for generation revenue. The revenue recorded in UGBA will be net of the credit for the E-SAVE program. Thus, no revision to the UGBA tariff is necessary.

### **Capital Costs**

To the extent that participating E-SAVE customers lack an interval meter, PG&E proposes to provide the meter and any necessary communications equipment at no cost to the customer and record the costs in AMDRA. Each month, PG&E will record a debit entry to the AMDRA equal to the capital related revenue requirement (e.g. return, taxes and depreciation) associated with the costs of the installed meter and communications equipment.

### **Request for Commission Approval**

PG&E requests the Commission issue a resolution on or before July 8, 2004, approving PG&E's request and specifically finding that:

1. PG&E is authorized to implement both the "E-SAVE" program and the "Power Down" program as described herein; and

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<sup>4</sup> In a separate advice filing being made today, PG&E is requesting that the UGBA be re-named GRAM.

2. PG&E is authorized to recover all costs associated with these programs, via PG&E's Advanced Metering and Demand Response Account (AMDRA) mechanism established in Decision (D.) 03-03-036 and the Utility Generation Balancing Account (UGBA), as described herein.

In order to meet the requested approval date of no later than July 8, 2004, PG&E respectfully requests the Commission to expedite the protest period for good cause shown, in accordance with General Order 96-A, Section IV-B Effective Date and Section XV-Exceptions. The Commission may reduce the comment period for a draft resolution provided by Public Utilities Code Section 331(g)(1) in accordance with its rules adopted pursuant to that Section. In accordance with Commission Rule of Practice and Procedure 77.7 (f)(9), PG&E requests that the Commission reduce the comment period due to public necessity.

Although PG&E's proposed new programs do not meet the criteria stated in the ACR, they are intended to address the underlying concerns of the ACR, and PG&E accordingly requests that this Advice Letter be considered in accordance with the shortened time periods outlined in the ACR.

PG&E therefore proposes the following schedule for review and approval of this Advice Letter:

Action	Due Date
Advice Letter Filed	June 14, 2004
Protests to Advice Letter	June 24, 2004
Draft Resolution	June 30, 2004
Comments on Resolution	July 2, 2004
Final Resolution Adopted	July 8, 2004

### Protests

PG&E requests that anyone wishing to protest this filing do so by sending a letter by **June 24, 2004**, which is 10 days from the date of this filing and less than the 20 days provided for by Section II.G. of General Order 96-A. 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 K. 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

### **Effective Date**

In accordance with Section V.B. of General Order 96-A, PG&E requests that this advice filing and the tariff sheets attached hereto become effective on **July 8, 2004**, which is less than regular notice.

### **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 and the parties on the service list for R.02-06-001. 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. Donmala*  
Vice President - Regulatory Relations

Attachments

cc: Service List R.02-06-001

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
21695-E	Electric Preliminary Statement CS - Advanced Metering And Demand Response Account (AMDRA)	21510-E
21696-E	Electric Preliminary Statement CS (Continued)	21510-E
21697-E	Electric Preliminary Statement CS (Continued)	21510, 21565-E
21698-E	Electric Rate Schedule E-SAVE – Voluntary Reduction Incentive Program	New
21699-E	Electric Rate Schedule E-SAVE (Continued)	New
21700-E	Electric Rate Schedule E-SAVE (Continued)	New
21701-E	Electric Rate Schedule E-SAVE (Continued)	New
21702-E	Sample Form – Customer Agreement And Password Agreement Governing Use Of Internet-Based Software (Form 79-977)	20406-E
21703-E	Table of Contents - Sample Forms (Continued)	20624-E
21704-E	Table of Contents – Preliminary Statement (Continued)	21477-E
21705-E	Table of Contents – Rate Schedules (Continued)	21501-E
21706-E	Table of Contents	21477-E



PRELIMINARY STATEMENT

CS. ADVANCED METERING AND DEMAND RESPONSE ACCOUNT (AMDRA)

1. **PURPOSE:** The purpose of the Advanced Metering and Demand Response Account (AMDRA) is to record and recovers the incremental, one-time set-up and ongoing Operating and Maintenance (O&M) and Administrative and General (A&G) expenses incurred to develop and implement, or in reasonable anticipation of implementing (i.e., all development and implementation costs incurred after January 1, 2003), the demand response programs adopted in Phase 1 and Phase 2 of the Advanced Metering, Demand Response, and Dynamic Pricing Proceeding. The authorization for recovery in Phase 1 is pursuant to Ordering Paragraph 8 of Decision 03-03-036 and in Phase 2 is pursuant to the Assigned Commissioner's Ruling and Scoping Memo, date November 24, 2003.

In addition, pursuant to Decision 04-01-012, the AMDRA will also record the Statewide Pricing Pilot (SPP) 2004 activities, and the administrative costs associated with Phase 2 of Rulemaking 02-06-001.

2. **APPLICABILITY:** The AMDRA applies to all customer classes, except for those specifically excluded by the Commission.
3. **REVISIONS:** The revision dates applicable to the AMDRA shall be upon approval of the annual advice filing referenced below or as otherwise ordered by the Commission.
4. **RATES:** The current AMDRA does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the AMDRA by making entries to this account at the end of each month as follows:

- a. A debit entry equal to the UDC's incremental one-time "set up" and ongoing O&M and A&G expenses incurred to develop and implement, or incurred in reasonable anticipation of implementing, the following programs being developed in Rulemaking 02-06-001: (1) the statewide pricing pilot (SPP) for small customers (under 200 kW), and (2) demand response tariffs and programs for large customers (greater than 200 kW), including:

1. Market research prerequisite to SPP implementation;
2. Development of rate, information, and technology treatments for various SPP cells;
3. Sample design for various SPP cells;
4. Miscellaneous pilot design refinement and implementation activities;
5. Development of systems for billing and implementing tariffs and programs for large customers; and
6. Miscellaneous large customer tariff refinement and implementation activities reasonably necessary to ensure timely implementation of large customer tariffs and programs approved in the Phase 1 decision.
7. Incremental activities in 2004 as described in Decision 04-01-012 which include: (1) Automated Demand Response System Pilot and Enabling Technologies, (2) CPP-V Track A/Enhanced Website Information, (3) San Francisco Co-op Track B, and (4) Additional Pilot Evaluation and Customer Research Activities.

(L)

(Continued)



PRELIMINARY STATEMENT  
(Continued)

CS. ADVANCED METERING AND DEMAND RESPONSE ACCOUNT (AMDRA) (Cont'd.)

5. ACCOUNTING PROCEDURE: (Cont'd.)

a. (Cont'd.)

8. Demand response programs proposed by PG&E in response to the June 4, 2004 "Assigned Commissioner's Ruling Inviting Filing Of Advice Letters To Implement Additional Demand Response Programs in Summer 2004," and adopted by the Commission, including but not limited to: (N)

(a) The Voluntary Reduction Incentive Programs (E-SAVE); and

(b) The 2004 "Power Down" program. (N)

b. A debit entry equal to PG&E's incremental O&M and A&G expenses, including costs of consultants, and costs of workshop participation, incurred after September 19, 2003, of developing analyzing proposals for and participating in Phase II of Rulemaking (R.) 02-06-001 within the scope of the November 24, 2003 Assigned Commissioner's Ruling and Scoping Memo (Phase II) issued in Docket R.02-06-001, including: (L)

(1) Development of an advance metering infrastructure (AMI) business case methodology, including development of costs and benefits and methodologies to evaluate the costs and benefits.

(2) Development of technology options, such as Air-Conditioning (A/C) Cycling, and how they interface with AMI.

(3) Development of PG&E's plan (both for 2004 and post-2004 proposals and activities) for achieving the Commission's 5 percent demand response target in 2007, including analysis of the feasibility of achieving the target, PG&E's position on modification of existing programs, and preliminary identification of new programs. (L)



PRELIMINARY STATEMENT

(Continued)

CS. ADVANCED METERING AND DEMAND RESPONSE ACCOUNT (AMDRA) (Cont'd.)

5. ACCOUNTING PROCEDURE: (Cont'd.)

- c. A debit entry equal to PG&E's incremental O&M and A&G expenses, including costs of consultants and internal staff, incurred in: (1) developing an advanced metering infrastructure (AMI) business case analysis as contemplated by the November 24, 2003 Assigned Commissioner's Ruling and Scoping Memo (Phase 2) and the February 19, 2004 Joint Assigned Commissioner and Administrative Law Judge's Ruling issued in R.02-06-001, and as discussed in subsequent workshops facilitated by CPUC and CEC staff, and (2) pre-planning evaluation and assessment activities carried out in reasonable anticipation of deployment of AMI systems under the time frame in the proposed schedule discussed by the CPUC and CEC staff in the workshops held in R.02-06-001 on March 29 and 30, 2004, including, without limitation: (L)

  - (1) All activities reasonably necessary for the development of an AMI business case analysis such as:
    - (a) Determination of all internal and external costs associated with different AMI rollout scenarios, including: issuance and analysis of requests for proposals (RFPs) for AMI technology acquisition; AMI technology evaluation; evaluation of information technology (IT) costs; evaluation of costs of interfacing AMI with utility systems; and development of computer models to analyze costs and financing.
    - (b) Estimation of utility operational benefits of AMI deployment under different under different rollout scenarios.
    - (c) Estimation and valuation of demand response benefits under different rollout scenarios including development of suitable computer models.
    - (d) Continued costs of workshop participation related to AMI analysis and deployment.
  - (2) Activities associated with pre-AMI deployment evaluation and planning. These activities would assess functional and technical system requirements for infrastructure, communication systems, internal system integration, as well as other potential rollout requirements.

PG&E will provide the Energy Division with a bi-monthly update and report of the costs being Recorded for items 1 and 2 above. (L)

- d. A debit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the above entry at a rate equal to one-twelfth 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. (L)

PG&E shall file an annual advice letter, which shall include a summary of the entries to this account and a proposal for the disposition of the debit balance in the account. (L)

- e. A debit entry for capital-related revenue requirements, if any, that includes depreciation expense, the return on investment, federal and state income taxes, and properly taxes associated with the costs of installation of meter and communications equipment. (N)



SCHEDULE E-SAVE – VOLUNTARY REDUCTION INCENTIVE PROGRAM

APPLICABILITY: Schedule E-SAVE, the Voluntary Reduction Incentive Program (E-SAVE) offers bundled service customers incentives for voluntarily reducing their energy consumption by a minimum of twenty percent (20%) when requested by Pacific Gas and Electric Company (PG&E) to increase system reliability. (N)

E-SAVE is optional for bundled service customers with a billed maximum demand of 200 kilowatts (kW) or greater during any one of the past 12 billing months. Customers must receive service on a demand Time-Of Use (TOU) electric rate schedule. Schedule AG-V, Schedule AG-R, and Schedule S, are exempted from participating in E-SAVE. Customers must also have interval metering to receive service under this Program.

A customer is not eligible to participate in E-SAVE if the revenue metering configuration is either Net Sale or Wholesale Transaction as specified in PG&E's Interconnection Handbook. A customer with multiple meters at a single site may qualify for E-SAVE under the specified multiple meter provisions of this tariff. This schedule is available until modified or cancelled by the California Public Utilities Commission (CPUC).

TERRITORY: This schedule applies everywhere PG&E provides electric service.

ELIGIBILITY: This schedule is available to individual PG&E customers who are currently being served under a commercial, industrial and agricultural customers schedule. Each customer must take service under the provisions of their otherwise-applicable rate schedule.

Customers must submit an Inter-Act Agreement (Form 79-977) in order to establish service under this rate schedule. In addition, customers must have the required metering and notification equipment in place prior to participation in this Program.

Customers who are "Essential Customers" under PG&E's Electric Emergency Plan and as defined by the Commission in Rulemaking 00-10-002, must submit to PG&E a written declaration that states that the customer is, to the best of that customer's understanding, an Essential Customer under Commission rules and exempted from rotating outages. The declaration must also state that the customer voluntarily elects to participate in this interruptible program for part of its load upon request by PG&E under the terms of the E-SAVE, while continuing to adequately meet its essential needs with backup generation or other means. In addition, an Essential Customer may commit no more than a total of 50 percent (50%) of its average peak load to all demand response programs for each participating account.

Customers that have multiple meters located at a single site (e.g., contiguous property, campus facilities, business parks) with individual meters that have less than 200 kW (as described in the Applicability Section) may participate in this program under the provisions stated in Multiple Meter Customer Section of this tariff. (N)

(Continued)



SCHEDULE E-SAVE – VOLUNTARY REDUCTION INCENTIVE PROGRAM  
(Continued)

**METERING EQUIPMENT:** Each participating customer account must have an interval meter capable of recording usage in 15-minute intervals installed that can be read remotely by PG&E. Metering equipment (including telephone line, cellular, or radio control communication device) must be in operation for at least ten (10) days prior to participating in E-SAVE to establish baseline. If required, PG&E will provide and install the metering equipment at no cost to the customer. PG&E will also provide meter data retrieval at no cost to those customers receiving free meters through this tariff until otherwise directed by the CPUC. (N)

**NOTIFICATION EQUIPMENT:** Customers, at their expense, must have access to the Internet and an e-mail address to receive notification regarding program operations. In addition, all customers must have, at their expense, an alphanumeric pager that is capable of receiving a text message sent via the Internet. A customer cannot participate in E-SAVE until all of these requirements have been satisfied.

PG&E may also use other electronic means of communication to notify customers of a E-SAVE Event including, but not limited to, telephone, pager, fax, and mass media announcements. If a E-SAVE Event occurs, customers will be notified using one or more of the above-mentioned systems. PG&E will make best efforts to notify customers, however it is the customer's responsibility to receive such notice and to check the PG&E website to see if E-SAVE is activated. PG&E does not guarantee the reliability of the pager system, e-mail system or Internet site by which the customer receives notification.

**EVENT NOTICE:** By 2:00 p.m. (Pacific Time), PG&E may implement an E-SAVE Event (Event) for the following day when the forecasted Day-Ahead hourly market prices equal or exceed \$0.20 per kWh for four consecutive hours between 12:00 noon and 6:00 p.m. the next day. PG&E will notify customers of such event, and will post the hours for which the Event is being issued through the program's web site by 3:00 p.m. the day preceding the Event. Event notices will be issued on Friday by 3:00 p.m. for events occurring on the following Monday, or for events that are issued for Tuesday following a holiday that falls on Monday. Events will only be issued for weekdays excluding holidays.

Participating customers do not have to acknowledge receipt of the Event notice or bid load into the program.

**WEBSITE:** When a Program Event is issued, PG&E will communicate the following information on the Program's website:

1. The Date and the Time Period of the Events; and
2. The customer's specific energy baseline (CSEB), based on the hourly average of the three (3) highest energy usages on the immediate past ten (10) similar days. The three (3) highest energy usage days will be deemed as those days with the highest total kilowatt-hour usages between noon and 8:00 p.m. The past ten (10) similar days will include Monday through Friday, excluding holidays, and will additionally exclude days when the customer was paid to reduce load on an interruptible or other curtailment program or days when rotating outages are called. (N)

(Continued)



SCHEDULE E-SAVE -- VOLUNTARY REDUCTION INCENTIVE PROGRAM  
(Continued)

PROGRAM TESTING:

PG&E may activate an E-SAVE Event with a simulated test trigger twice per year. Each test event shall be no longer than four (4) hours. During such a test, the customer shall be responsible for curtailing load consistent with the terms of this schedule. Participants will receive incentive payment for qualifying load reduction based on terms of an actual E-SAVE Event.

(N)

EVENT LOAD CHECK:

Customers will only be eligible for E-SAVE incentive if during a one-hour period, starting two hours prior to the start of the event, the customer's load meets or exceeds at least eighty percent (80%) of their hourly baseline usage for that same hour prior to the event. Customers who do not meet this requirement will not be eligible for the event incentive for any reduction that occurs during the event period.

INCENTIVE PAYMENTS:

PG&E will evaluate and pay for the customer's hourly load reductions realized under E-SAVE within ninety (90) days after each Event, depending on when the Event occurred within the participant's actual billing cycle. The incentive payments will be reflected in the customer's regular monthly bill as an adjustment.

Energy reduction for a E-SAVE Event will be determined as the difference between the sum of the customer's baseline usage during the corresponding hours of the event and the sum of the customer's actual energy usage during the hours of the event. If the customer is able to achieve a minimum twenty percent (20%) reduction of load during the event period, as compared to the accumulative baseline load for the same time period, the customer would be eligible for E-SAVE incentive. Percent reduction will be rounded to the nearest whole percentage number when calculating the customer's incentive eligibility. No incentive will be paid if the customer does not achieve the minimum twenty percent (20%) reduction of load during the event period.

E-SAVE incentive for qualifying load reduction will be equal to \$0.20/kWh of load reduction during the event time period.

There are no penalties associated with this program for failing to comply (reduce energy) with an E-SAVE Event.

(N)

(Continued)



**SCHEDULE E-SAVE – VOLUNTARY REDUCTION INCENTIVE PROGRAM**

(Continued)

<p><b>INTERACTION WITH CUSTOMER'S OTHER APPLICABLE PROGRAMS AND CHARGES:</b></p>	<p>Participating customers' regular electric service bills will continue to be calculated each month based on their actual recorded monthly demands and energy usage.</p> <p>Customers who participate in a third-party sponsored interruptible load program must immediately notify PG&amp;E of such activity. E-SAVE participants shall not participate in the California Power Authority Demand Reserves Partnership (CPA-DRP) program, the California ISO's Participating Load Program (Supplemental and Ancillary Services), PG&amp;E's Demand Bidding Program (Schedule E-DBP), PG&amp;E's Optional Binding Mandatory Curtailment (Schedule E-OBMC) Program, and PG&amp;E's Pilot Optional Binding Mandatory Curtailment (Schedule E-POBMC) Program.</p> <p>Load can only be committed to one program for any given hour of a curtailment, and customers will be paid for performance under only one program for a given load reduction. In other words, should another demand response program be activated, while an E-SAVE Event is in progress, those events will supersede an E-SAVE Event, and no E-SAVE incentive payments will be applied for those overlapping hours. With the limitation stated above, E-SAVE customers may participate in the Non-Firm Program, the Base Interruptible Program (Schedule E-BIP), and the Critical Peak Pricing Program (Schedule E-CPP),</p> <p>Customers enrolled in the Scheduled Load Reduction Program (Schedule E-SLRP) may participate in E-SAVE during the days when the customer's load is not scheduled for curtailment under the E-SLRP program.</p>	<p>(N)</p>
<p><b>EMERGENCY STANDBY GENERATION:</b></p>	<p>Customers may achieve energy reductions by operating back-up or onsite generation. The customer will be solely responsible for meeting all environmental and other regulatory requirements for the operation of such generation.</p>	
<p><b>PROGRAM TERMS:</b></p>	<p>Customers' participation in this tariff will be in accordance with Electric Rule 12. Customers may terminate their participation in the program by giving a minimum of 30 days' written notice. Cancellation will become effective with the first regular billing cycle after the 30-day notice period.</p>	<p>(N)</p>

(Continued)



PACIFIC GAS AND ELECTRIC COMPANY  
CUSTOMER AGREEMENT AND PASSWORD AGREEMENT  
GOVERNING USE OF INTERNET-BASED SOFTWARE  
FORM NO. 79-977 (6/04)  
(ATTACHED)

(T)  
I  
(T)

(Continued)



Pacific Gas and Electric Company

**Customer Agreement and Password Agreement Governing Use of Internet-Based Software**

DISTRIBUTION:

- PARTICIPANT (Original)
- ACCOUNT SERVICES
- CUSTOMER BILLING
- RATES & TARIFFS (Original)
- CUSTOMER ENERGY MGMT

REFERENCE:

- Cordaptix ID \_\_\_\_\_
- Service Account ID \_\_\_\_\_
- Area/Division \_\_\_\_\_
- Acct. Rep. \_\_\_\_\_
- Rep. Ph. No. \_\_\_\_\_

This agreement is dated this \_\_\_\_\_ day of \_\_\_\_\_, 2\_\_\_\_ and is entered into, by and between: \_\_\_\_\_, having its registered and principal place of business located at \_\_\_\_\_ ("Customer"), and Pacific Gas and Electric Company ("PG&E").

This agreement outlines the respective duties and responsibilities of Customer and PG&E related to Customer's use of an Internet-Based Software. If the Customer is also participating in PG&E's Demand Response Programs this agreement will be in conjunction with PG&E's Demand Response Program Agreement(s) (DRPA) and its tariffs. This agreement covers Customer's specific facilities located at:

\_\_\_\_\_

(List multiple-meter accounts on Page 4 of this Agreement)

**GENERAL TERMS AND CONDITIONS**

Term: This agreement shall become effective as of the date first indicated above and shall continue in full force unless otherwise terminated as provided under this Agreement or as specified in the appropriate PG&E tariffs governing PG&E's Demand Response Programs.

Internet-Based Software Participation: Customer agrees they have read and accept the Conditions of Use agreement governing use of the Internet-Based Software posted electronically via a 'click-through' agreement located at <https://inter-act.pge.com> or <https://emeter.pge.com> ("Conditions of Use"), including but not limited to the "Use of the Service" and "No Warranties" sections as well as the provision providing for amendment to the Conditions of Use agreement from time to time.

Load Data: Customers understand that the information provided by the Internet-Based Software will consist of interval metering data directly measured from a PG&E interval meter located at the specific facility noted above. PG&E will determine which internet site the Customer's interval meter data will be located. Customer understands and accepts that metering data in the Internet-Based Software is "raw" meter quality data that has not been validated or edited for final billing calculations. Therefore, the data may not directly correlate to Customer's final billing usage.

Customer Technical Requirements: The Customer must have an interval meter installed at the specific facility noted above or on Page 4 for multiple-meter customer group(s) (CPP and DBP Applicants only).

For use of the Internet-Based Software the following hardware and software is required and must be installed at Customer's facility:

- Windows 95/98/NT/2000 compliant system
- Microsoft Internet Explorer 5.01 Web browser (or above)
- 32MB RAM
- 10MB available disk space
- 17" monitor or larger
- Video card capable of supporting 1024x768 resolution

**Termination:** PG&E reserves the right to terminate this agreement at any time as provided in the electronic Conditions of Use governing use of the Internet-Based Software. This contract shall at all times be subject to such changes or modifications by the Public Utilities Commission of the State of California as said Commission may, from time to time, direct in the exercise of its jurisdiction.

**Your Password:** Customer will have a user name and password to access the Internet-Based Software. Customer agrees to safeguard the Customer's user name and password in a manner consistent with the electronic Conditions of Use governing use of the Internet-Based Software. In addition, Customer agrees:

1. Any Password provided to Customer is permitted solely as an administrative convenience to Customer, which will be solely responsible for the monitoring and use of any such password and, without limitation, PG&E will have no responsibility whatsoever for controlling or monitoring the use of such Passwords and no liability for any use of such Passwords.
2. Customer shall be solely responsible for any and all acts or omissions with respect to access and use of the Internet-Based Software (including the execution of transactions) by any person using the Password, and it shall only provide the Passwords to its employees and others who are authorized by Customer to access and use the Internet-Based Software and not to any unauthorized third parties. Customer will implement and enforce reasonable measures to protect the confidentiality of the Password and shall immediately notify PG&E of any unauthorized disclosure or use of the Passwords.
3. Any Terms and Conditions and any transactions executed using the Internet-Based Software, and all records of such, will be deemed to be "in writing" and to have been "signed" for all purposes. Customer agrees to be bound by any transaction executed using the Internet-Based Software and by any person using the passwords, subject to and in accordance with the terms of this Agreement, the Customer's Interruptible Program Agreements and related tariffs.

**Indemnity:** Customer agrees to indemnify PG&E, its officers, directors, agents and employees against all loss, expense, and liability resulting from injury to, or death of persons, and injury to property, arising out of or any way connected with the performance of this Agreement.

#### **SPECIFIC TERMS AND CONDITIONS FOR PARTICIPATION IN PG&E'S LOAD MANAGEMENT PROGRAMS**

**General:** For Customers that will or may participate in PG&E's Demand Response Programs (excluding PG&E's Non-Firm Service Programs), in addition to all of the above, the following will also apply:

**Demand Response Programs:** All requirements for specific load reductions, Customer obligations and Curtailment Event parameters are outlined in the specific program tariffs for Schedule E-BIP – Base Interruptible Program (E-BIP), Schedule E-CPP – Critical Peak Pricing Program (E-CPP), Schedule E-DBP – Demand Bidding Program (E-DBP), Schedule E-SLRP – Scheduled Load Reduction Program (E-SLRP), Schedule E-OBMC - Optional Binding Mandatory Curtailment Program (E-OBMC) and Schedule E-POBMC - Pilot Optional Binding Mandatory Curtailment Program (E-POBMC). Customer agrees to all terms and conditions specified in these and all other applicable PG&E tariffs.

Customers understand that this Agreement also allows the customer to participate in Schedule E-SAVE, the Voluntary Reduction Incentive Program. E-SAVE is a non-bid, no commitment demand response program that pays customers an incentive if they voluntarily reduce their load by a minimum of twenty percent (20%) or more when an E-SAVE Event is issued. The terms and conditions of the program can be found in Schedule E-SAVE. Enrollment in Schedule E-SAVE is automatic with the execution of this contract unless the customer designates that they do not wish to participate in this program, or the provisions of the Schedule E-SAVE prohibits the customer from participation.

- I wish to be excluded from participating in E-SAVE and do not wish to receive E-SAVE event notices. (Please check if applicable)

Load Data and Notification: Customers understand that they must utilize the Internet-Based Software located at <https://inter-act.pge.com> for load curtailment event notifications, curtailments, and communications.

Customer Technical Requirements: Customer agrees to retain the interval meter installed at this location until December 31, 2004. PG&E agrees to maintain an interval meter at this location until December 31, 2004, unless specifically required to cease maintenance by any regulatory or legal entity for pricing operational reasons.

Load Reduction Calculation: While the data provided by the Internet-Based Software may not match billing quality data, Customer understands and agrees that for purposes of load reduction and incentive payments from E-BIP, E-CPP, E-DBP, E-SLRP, E-OBMC, E-POBMC, or any other Demand Response Programs covered under this agreement, the interval data posted to the internet-based software will be treated as final and that all incentive payment calculations will be based on this data.

Communication of Load Curtailment Events: For those Customers participating in PG&E's Demand Response Programs, PG&E's Internet-Based Software will communicate the Curtailment Events (issued by the ISO or PG&E) ("Event") to the Customer in a manner outlined in the specific program tariff(s). The Event will be communicated to the customer via the Internet-Based Software in the form of an e-mail and/or an e-page. Customer will then have the obligation to log-in to the Internet-Based Software in a timely manner to receive the specific details of the Event for Customer action. PG&E will make reasonable efforts to communicate ongoing system conditions in conjunction with the ISO's or PG&E's electric emergency conditions. At minimum, PG&E will communicate as described in its relevant Load Management Programs.

Customer Testing Requirement: PG&E may require Customer to participate in curtailment tests to ensure Internet-Based Software reliability and load reduction performance. Customer agrees to participate in the test(s) and reduce actual load as specified under each curtailment program(s) specified in its Interruptible Program Agreement for the event time prescribed. PG&E will make reasonable efforts to coordinate the test with any Curtailment Events that may occur during that time in an effort to lessen any impact on Customer's operations.

### 1.1.1 DEFINITIONS

Curtailment Event: A load reduction event, which will be called as directed by the ISO or PG&E under the terms and conditions prescribed in PG&E's specific programs tariff(s) as approved by the California Public Utilities Commission (CPUC).

Customer: A participating Customer described by a single account at a specified facility.

Internet-Based Software: The software the Customer uses to view usage data. For Customers participating in PG&E's Load Management Programs, the software the Customer is required to use is located at <https://inter-act.pge.com>.

ISO: Independent System Operator responsible for the operation of the State of California's electric transmission system and implementation of the State of California's electric emergency plan.

Load Reduction: The amount of energy removed from a facility's total connected load as described in the terms of kilowatt (kW), kilowatt hour (kWh), megawatt (MW), or megawatt hour (MWh).

This Agreement is effective as of the date specified.

On Behalf of CUSTOMER

By: \_\_\_\_\_  
(Authorized Signature)

\_\_\_\_\_  
(Type or Print Name)

Title: \_\_\_\_\_

Date: \_\_\_\_\_

On Behalf of PACIFIC GAS AND ELECTRIC

By: \_\_\_\_\_  
(Authorized Signature)

\_\_\_\_\_  
(Type or Print Name)

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**ATTACHMENT A**

**ATTACHMENT – MULTIPLE METER CUSTOMER GROUP – LEAD ACCOUNT TO BE 200 kW OR LARGER (CPP and DBP APPLICANTS ONLY)**

Each multiple-meter customer group must have at least one service account with an average demand of 200 kW or larger and be designated as the lead account. A lead Applicant may group accounts to qualify for the CPP and/or DBP programs provided each individual service account is on an applicable rate schedule, has interval metering in place, and takes service under the same corporate tax identification number. Refer to Schedules E-CPP and/or E-DBP for additional program requirements for multiple-meter customer groups.)

I hereby state that I am the \_\_\_\_\_ (title) of \_\_\_\_\_ (Company), and am authorized to make this declaration on behalf of my Company at the following location for the accounts listed below.

Tax Payer Identification Number: \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_ Zip \_\_\_\_\_

\_\_\_\_\_  
(Applicant Signature)

\_\_\_\_\_  
(Date)





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62-4501		Absolving Service Agreement .....	3190-E	
62-4527	1/91	Agreement to Perform Tariff Schedule Related Work.....	11598-E	
62-4778	12/89	Cancellation of Contract.....	11047-E	
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--		Agreement for Extending Electric Line and Supplying Electric Service Under Guarantee of Operations for Central Camp, Madera County, CA.....	3158-E	
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79-848	11/95	Generation Operating Agreement .....	13864-E	
79-861	9/96	Electric Data Interchange Trading Partner Agreement .....	14148-E	
79-862	12/96	Interim Competition Transition Charge Agreement.....	14233-E	
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79-936	9/90	Deed of Conveyance.....	11566-E	
79-937	8/90	Assignment Agreement.....	11567-E	
79-954	12/97	Departing Load Competition Transition Charge Agreement.....	14974-E	
79-955	12/97	Amendment to Pacific Gas and Electric Company's Departing Load Competition Transition Charge Agreement for Subsequently Obtained CTC Exemption .....	14975-E	
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**PG&E Electric Advice Filing List  
General Order 96-A, Section III(G)**

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Aglet Consumer Alliance  
Agnews Developmental Center  
Ahmed, Ali  
Alcantar & Elsesser  
Anderson Donovan & Poole P.C.  
Applied Power Technologies  
APS Energy Services Co Inc  
Arter & Hadden LLP  
Avista Corp  
Barkovich & Yap, Inc.  
BART  
Bartle Wells Associates  
Blue Ridge Gas  
Bohannon Development Co  
BP Energy Company  
Braun & Associates  
C & H Sugar Co.  
CA Bldg Industry Association  
CA Cotton Ginners & Growers Assoc.  
CA League of Food Processors  
CA Water Service Group  
California Energy Commission  
California Farm Bureau Federation  
California ISO  
Calpine  
Calpine Corp  
Calpine Gilroy Cogen  
Cambridge Energy Research Assoc  
Cameron McKenna  
Cardinal Cogen  
Cellnet Data Systems  
Childress, David A.  
City of Glendale  
City of Healdsburg  
City of Palo Alto  
City of Redding  
CLECA Law Office  
Constellation New Energy  
CPUC  
Creative Technology  
Crossborder Inc  
CSC Energy Services  
Davis, Wright Tremaine LLP  
Davis, Wright, Tremaine, LLP  
Defense Fuel Support Center  
Department of the Army  
Department of Water & Power City  
Dept of the Air Force  
DGS Natural Gas Services  
DMM Customer Services  
Downey, Brand, Seymour & Rohwer  
Duke Energy  
Duke Energy North America

Duncan, Virgil E.  
Dutcher, John  
Dynegy Inc.  
Ellison Schneider  
Energy Law Group LLP  
Enron Energy Services  
Exeter Associates  
Foster, Wheeler, Martinez  
Franciscan Mobilehome  
Future Resources Associates, Inc  
GLJ Energy Publications  
Goodin, MacBride, Squeri, Schlotz &  
Grueneich Resource Advocates  
Hanna & Morton  
Heeg, Peggy A.  
Hogan Manufacturing, Inc  
House, Lon  
Imperial Irrigation District  
Integrated Utility Consulting Group  
International Power Technology  
J. R. Wood, Inc  
JTM, Inc  
Kaiser Cement Corp  
Korea Elec Power Corp  
Marcus, David  
Masonite Corporation  
Matthew V. Brady & Associates  
Maynor, Donald H.  
McKenzie & Assoc  
McKenzie & Associates  
Meek, Daniel W.  
Mirant California, LLC  
Modesto Irrigation Dist  
Morrison & Foerster  
Morse Richard Weisenmiller & Assoc.  
New United Motor Mfg, Inc  
Norris & Wong Associates  
North Coast Solar Resources  
Northern California Power Agency  
PG&E National Energy Group  
Pinnacle CNG Company  
PPL EnergyPlus, LLC  
Price, Roy  
Product Development Dept  
Provost Pritchard  
R. M. Hairston & Company  
R. W. Beck & Associates  
Recon Research  
Regional Cogeneration Service  
RMC Lonestar  
Sacramento Municipal Utility District  
SCD Energy Solutions  
Seattle City Light  
Sempra

Sempra Energy  
Sequoia Union HS Dist  
SESCO  
Sierra Pacific Power Company  
Silicon Valley Power  
Simpson Paper Company  
Smurfit Stone Container Corp  
Southern California Edison  
SPURR  
St. Paul Assoc  
Stanford University  
Sutherland, Asbill & Brennan  
Tabors Caramanis & Associates  
Tansev and Associates  
Tecogen, Inc  
TFS Energy  
TJ Cross Engineers  
Transwestern Pipeline Co  
Turlock Irrigation District  
United Cogen Inc.  
URM Groups  
Utility Cost Management LLC  
Utility Resource Network  
Wellhead Electric Company  
Western Hub Properties, LLC  
White & Case  
WMA