

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



August 6, 2004

Advice Letter 2524E|E-A

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

Subject: Methodology for Calculation of Non-Bypassable Charges for Mountain House
Area Customers (Modesto Irrigation District)

Dear Ms de la Torre:

Advice Letter 2524E|E-A is effective July 25, 2004. A copy of the advice letter is sent
herewith for your records.

Sincerely,

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

Director
Energy Division



**Pacific Gas and
Electric Company**

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 15, 2004

Advice 2524-E
(Pacific Gas and Electric Company ID U39E)

Subject: Methodology for Calculation of Non-Bypassable Charges for Mountain House Customers (Modesto Irrigation District)

Public Utilities Commission of the State of California:

Pacific Gas and Electric Company (PG&E) hereby files to clarify its calculations and methodologies for determining applicable non-bypassable charges (NBCs), and addresses the cost responsibility surcharges (CRS) imposed by Decision (D.) 03-07-028, for customers in the Mountain House Area of San Joaquin County, California, served by Modesto Irrigation District (MOD). This filing also is made in accordance with Decision (D.) 04-03-036, dated March 16, 2004, for PG&E's Application 03-02-005 pertaining to authorization to lease and sell certain electric distribution facilities serving the Mountain House Area to MOD.

Background

Pursuant to Public Utilities Code § 9610, a total of 137 Mountain House customers departed PG&E's service territory on January 1, 2001, and began receiving electric service from MOD. Decision 04-03-036 approved, among other things, an agreement between PG&E and MOD for the lease of certain electric distribution facilities in the Mountain House area ("the Lease Agreement") (Application 03-02-005 dated February 7, 2003). The Lease Agreement provides that MOD will pay NBCs on behalf of the departing customers. Ordering Paragraph 5 of D. 04-03-036 requires that PG&E file an advice letter clarifying PG&E's calculations and methodologies for determining the annual NBCs, and addressing the calculation and payment of any applicable CRS for municipal departing load imposed by D. 03-07-028.

Methodology and Illustrative Calculations

Attachment 1 to this filing is PG&E's update of the statement of methodology for calculating NBCs to be paid by MOD on behalf of departing customers.



Attachment 2 to this filing provides illustrative NBC calculations for three Mountain House customers, representing three different customers classes. As noted in Attachment 1, Mountain House customers are not obligated to pay the DWR-related components of the CRS imposed by D.03-07-028, since they departed prior to the February 1, 2001, threshold date adopted in that decision.¹

Protests

Anyone wishing to protest this filing may do so by sending a letter by **July 5, 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, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: 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

¹ See D.03-07-028, Ordering Paragraph 2. For PG&E, the CRS adopted by D.03-07-028 consists of the DWR Bond Charge (DWRBC), the DWR Power Charge (DWRPC), and the Competition Transition Charge (CTC). The DWRBC and DWRPC components of the CRS only apply to customers who departed PG&E service after February 1, 2001, and thus not to Mountain House customers (who departed on the January 1, 2001 transfer date). However, Mountain House customers are obligated to pay the CTC component of the CRS, which is applicable to customers who depart after December 20, 1995.

**Effective Date**

In accordance with General Order 96-A, PG&E requests that this advice filing become effective on regular notice, **July 25, 2004**, which is 40 days after the date of this filing.

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 service list parties for Application (A.) 03-02-005. 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. Tomcala/ss

Vice President - Regulatory Relations

Attachments

cc: Service List - A. 03-02-005

Revised Methodology for Calculation of Non-Bypassable Charges For Mountain House Customers

Pursuant to Ordering Paragraph 5 of Decision 04-03-036, this attachment describes PG&E's method of calculating the non-bypassable charge (NBC) obligations associated with PG&E's Mountain House customers that departed to Modesto Irrigation District (MID).

A total of 137 Mountain House customers departed PG&E service on January 1, 2001 and began receiving electric service from MID. Just prior to their departure, PG&E took a "snapshot" of each customer's billing determinants for the period of January 2000 to December 2000 (i.e., the 12 months immediately prior to their departure on January 1, 2001).

The NBC obligations of the Mountain House customers include Competition Transition Charges (CTCs, per Public Utilities Code Sections 367, 368, 375 and 376), Fixed Transition Amounts (FTA, per Code Section 840(d)),¹ and Nuclear Decommissioning (ND, per Code Section 379) Charges:²

- CTCs — The opportunity for utilities to recover and the obligation for customers to pay CTCs has been established both by Commission policy decisions and California law.³ Except for those specific activities expressly exempted by the California legislature or the Commission, these costs are to be paid by all energy consumers.
- FTA Charges — The FTA charge is only applicable to PG&E's residential and small commercial customers, to pay back rate reduction bonds issued to finance a 10 percent reduction in rates for these customers.
- ND Charges — ND costs are separately identified in Code Section 379 as a non-bypassable charge that will continue until those costs are fully recovered. Per PG&E Advice 1614-E, filed October 11, 1996, PG&E's Commission-

¹ Preliminary Statement Part AS of PG&E's electric tariffs establishes a Fixed Transition Amount (FTA) charge for residential and small commercial customers who received the 10 percent rate reduction on January 1, 1998, as mandated in Assembly Bill (AB) 1890 (Code § 368 (a)).

² PG&E's Public Purpose Program non-bypassable charges are not included because the Mountain House customers will be served by MID, which by law is required to have similar programs and cost components embedded within its tariff rates. See Ordering paragraph 12(h) of Decision 97-08-056.

³ Electric Restructuring Policy Decision (D.95-12-063), as modified by the Revised Policy Decision (D.96-01-009), primarily Conclusions of Law 54 and 58, and Ordering Paragraph 28, and AB 1890, primarily Code Sections 367, 368, 375, 376 and 840(d). (A.00-01-056)

jurisdictional nuclear decommissioning accrual is approximately \$33 million per year.⁴

The Department of Water Resources' Bond and Power Charges, imposed by Decision 03-07-028, do not apply to the Mountain House customers due to the fact that these customers departed prior to February 1, 2001.

Since January 2002 PG&E has been annually billing MID for all applicable NBCs. To date, PG&E has sent MID three annual NBC bills (for 2001, 2002, and 2003) covering the obligations of the 137 departing customers.

The first NBC bill (for 2001) was calculated by: (1) aggregating the usage "snapshots" of all customers on each rate schedule; (2) applying then-current schedule-specific NBC rates to the usage totals by schedule; and (3) summing the resulting NBC bills across schedules to obtain a total bill. Since then, however, each of the 137 customers was individually set up for departing load billing in PG&E's Customer Information System (CIS). PG&E's CIS calculates each departed customer's NBC bill based on monthly usage from the customer's 12-month historic "snapshot" and the then-current NBC rates applicable to the customer's rate schedule or otherwise approved by the Commission for municipal departing load. (See Attachment 2, which illustrates NBC calculations for three actual Mountain House customers on different rate schedules.). The monthly NBC charges for each customer are then summed across all customers to create one annual bill to send to MID covering the preceding year.

⁴ Nuclear Decommissioning costs were approved in the 1996 General Rate Case at \$36 million per year, and then reduced by Advice 1614-E to \$33 million per year after a ruling by the Internal Revenue Service.

ILLUSTRATIVE EXAMPLE OF NBC CALCULATION FOR THREE ACTUAL MOUNTAIN HOUSE CUSTOMERS

	Rates				Charges			Total Bill (\$)
	Sales	ND	CTC	FTA	ND	CTC	FTA	
	(kWh)	(\$/kWh)	(\$/kWh)	(\$/kWh)	(\$)	(\$)	(\$)	
Customer A (Schedule E-1)								
Jan	1,572	\$0.0005	\$0.0071	\$0.0078	\$1	\$11	\$12	\$24
Feb	540	\$0.0005	\$0.0071	\$0.0078	\$0	\$4	\$4	\$8
Mar	702	\$0.0005	\$0.0071	\$0.0078	\$0	\$5	\$5	\$11
Apr	613	\$0.0005	\$0.0071	\$0.0078	\$0	\$4	\$5	\$9
May	685	\$0.0005	\$0.0071	\$0.0078	\$0	\$5	\$5	\$11
Jun	796	\$0.0005	\$0.0071	\$0.0078	\$0	\$6	\$6	\$12
Jul	651	\$0.0005	\$0.0071	\$0.0078	\$0	\$5	\$5	\$10
Aug	907	\$0.0005	\$0.0071	\$0.0078	\$0	\$6	\$7	\$14
Sep	920	\$0.0005	\$0.0071	\$0.0078	\$0	\$7	\$7	\$14
Oct	638	\$0.0005	\$0.0071	\$0.0078	\$0	\$5	\$5	\$10
Nov	657	\$0.0005	\$0.0071	\$0.0078	\$0	\$5	\$5	\$10
Dec	873	\$0.0005	\$0.0071	\$0.0078	\$0	\$6	\$7	\$13
Annual	9,554				\$5	\$68	\$75	\$147

	Rates				Charges			Total Bill (\$)
	Sales	ND	CTC	FTA	ND	CTC	FTA	
	(kWh)	(\$/kWh)	(\$/kWh)	(\$/kWh)	(\$)	(\$)	(\$)	
Customer B (Schedule A-1)								
Jan	742	\$0.0005	\$0.0071	\$0.0082	\$0	\$5	\$6	\$12
Feb	774	\$0.0005	\$0.0071	\$0.0082	\$0	\$6	\$6	\$12
Mar	691	\$0.0005	\$0.0071	\$0.0082	\$0	\$5	\$6	\$11
Apr	681	\$0.0005	\$0.0071	\$0.0082	\$0	\$5	\$6	\$11
May	933	\$0.0005	\$0.0071	\$0.0082	\$1	\$7	\$8	\$15
Jun	1,610	\$0.0005	\$0.0071	\$0.0082	\$1	\$11	\$13	\$25
Jul	1,225	\$0.0005	\$0.0071	\$0.0082	\$1	\$9	\$10	\$19
Aug	1,674	\$0.0005	\$0.0071	\$0.0082	\$1	\$12	\$14	\$26
Sep	1,438	\$0.0005	\$0.0071	\$0.0082	\$1	\$10	\$12	\$23
Oct	789	\$0.0005	\$0.0071	\$0.0082	\$0	\$6	\$6	\$12
Nov	637	\$0.0005	\$0.0071	\$0.0082	\$0	\$5	\$5	\$10
Dec	814	\$0.0005	\$0.0071	\$0.0082	\$0	\$6	\$7	\$13
Annual	12,008				\$6	\$85	\$98	\$190

	Rates				Charges			Total Bill (\$)
	Sales	ND	CTC	FTA	ND	CTC	FTA	
	(kWh)	(\$/kWh)	(\$/kWh)	(\$/kWh)	(\$)	(\$)	(\$)	
Customer C (Schedule AG-1B)								
Jan	4,136	\$0.0640	\$0.0071	\$0.0000	\$265	\$29	\$0	\$294
Feb	3,751	\$0.0640	\$0.0071	\$0.0000	\$240	\$27	\$0	\$267
Mar	3,641	\$0.0640	\$0.0071	\$0.0000	\$233	\$26	\$0	\$259
Apr	2,864	\$0.0640	\$0.0071	\$0.0000	\$183	\$20	\$0	\$204
May	3,020	\$0.0640	\$0.0071	\$0.0000	\$193	\$21	\$0	\$215
Jun	3,297	\$0.0640	\$0.0071	\$0.0000	\$211	\$23	\$0	\$234
Jul	3,020	\$0.0640	\$0.0071	\$0.0000	\$193	\$21	\$0	\$215
Aug	3,676	\$0.0640	\$0.0071	\$0.0000	\$235	\$26	\$0	\$261
Sep	3,321	\$0.0640	\$0.0071	\$0.0000	\$213	\$24	\$0	\$236
Oct	2,442	\$0.0640	\$0.0071	\$0.0000	\$156	\$17	\$0	\$174
Nov	3,375	\$0.0640	\$0.0071	\$0.0000	\$216	\$24	\$0	\$240
Dec	4,325	\$0.0640	\$0.0071	\$0.0000	\$277	\$31	\$0	\$308
Annual	40,868				\$2,616	\$291	\$0	\$2,906

Notes:

1. ND and FTA rates shown are from PG&E's current tariffs in effect on March 1, 2004.
2. Currently, there is no Commission approved CTC rate for municipal departing customers. The CTC rate shown has been proposed in PG&E's updated testimony (p. 8-2) filed on 2/17/04 in the Energy Resource Recovery Account (A. 03-08-004) proceeding. Future Commission approved CTC rates will be used for actual bill calculation.

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

ABAG Power Pool
Accent Energy
Agllet 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 Gas Acquisition Svcs
California ISO
Calpine
Calpine Corp
Calpine Gilroy Cogen
Cambridge Energy Research Assoc
Cameron McKenna
Cardinal Cogen
Cellnet Data Systems
Chevron Texaco
Chevron USA Production Co.
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
Cross Border Inc
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
Dynergy Inc.
Ellison Schneider
Energy Law Group LLP
Enron Energy Services
Exelon Energy Ohio, Inc
Exeter Associates
Foster Farms
Foster, Wheeler, Martinez
Franciscan Mobilehome
Future Resources Associates, Inc
G. A. Krause & Assoc
GLJ Energy Publications
Goodin, MacBride, Squeri, Schlotz &
Gruneich Resource Advocates
Hanna & Morton
Heeg, Peggy A.
Hogan Manufacturing, Inc
House, Lon
Imperial Irrigation District
Integrated Utility Consulting Group
International Power Technology
Interstate Gas Services, Inc.
J. R. Wood, Inc
JTM, Inc
Kaiser Cement Corp
Korea Elec Power Corp
Luce, Forward, Hamilton & Scripps
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.
Navigant Consulting
New United Motor Mfg, Inc
Norris & Wong Associates
North Coast Solar Resources
Northern California Power Agency
Office of Energy Assessments
Palo Alto Muni Utilities

PG&E National Energy Group
Pinnacle CNG Company
PITCO
Plurimi, Inc.
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
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Southern California Edison
SPURR
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