



**Pacific Gas and  
Electric Company®**

**Brian K. Cherry**  
Director  
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May 13, 2005

**Advice 2632-G/2664-E**  
**(Pacific Gas and Electric Company ID U 39 M)**

Public Utilities Commission of the State of California

**Subject:**     **Proposal of Pacific Gas and Electric Company to Establish  
New Memorandum Accounts to Record Advanced Metering  
Infrastructure Costs**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby requests California Public Utilities Commission (CPUC or the Commission) approval to establish two new Advanced Metering Infrastructure Memorandum Accounts (AMIMA-E for electric and AMIMA-G for gas) to record costs incurred for the Advanced Metering Infrastructure (AMI) Project prior to Commission approval of PG&E's requests for rate recovery in Application (A.)05-03-016 and its upcoming AMI Project Application. Upon approval of these accounts, PG&E will record all costs incurred for the AMI Project for future review and disposition by the Commission in these accounts, and such AMI costs will no longer be recorded in the Advanced Metering and Demand Response Account (AMDRA).<sup>1</sup>

**Background**

In its Order Instituting Rulemaking (R.)02-06-001, the CPUC began a process of assessing ways to implement programs and tools that would enable utilities to offer demand response options to customers in order to reduce energy consumption on peak days. The CPUC, in conjunction with the California Energy Commission, set targets to meet specific demand response goals by the summer of 2007. Although PG&E has numerous programs targeted to large customers, the ability to move toward achieving those 2007 goals requires

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<sup>1</sup> Costs previously recorded in AMDRA, prior to approval of these accounts, will be subject to review and disposition by the Commission in accordance with the AMDRA tariff and related Commission decisions and resolutions. Advice Letter 2633-E-A, dated February 25, 2005, is currently pending before the Commission regarding costs booked into AMDRA, and PG&E will seek separate recovery of amounts booked into AMDRA in accordance with AL 2633-E-A prior to the effectiveness of accounts proposed in this Advice Letter.

participation by the residential and small commercial sectors. PG&E's AMI Project is a key component of that plan.

PG&E filed its initial preliminary AMI Project Business Case in October of 2004 and PG&E updated its business case filing on March 15, 2005. Simultaneous with the AMI business case filing in March, PG&E also filed A.05-03-016 seeking rate recovery for certain AMI Project pre-deployment costs. PG&E continues to seek expeditious approval of A.05-03-016.

Nevertheless, PG&E believes that it is imperative that certain critical path AMI activities must commence and continue beginning as early as July 1, 2005, pending Commission review of A.05-03-016 and PG&E's AMI Project Application. Therefore, PG&E is now requesting expedited approval to record costs associated with the AMI Project in the proposed memorandum accounts, AMIMA-E and AMIMA-G, in order to preserve the ability to obtain future rate recovery of these costs in A.05-03-016 and the AMI Project Application, as listed in the attached Preliminary Statements proposed herein.<sup>2</sup> PG&E is also identifying possible categories of costs which will be recorded to these memorandum accounts so all AMI-related costs incurred prior to Commission decisions on A.05-03-016 and the AMI Project Application are tracked and subject to verification, on a month-to-month basis, in one place.

PG&E is making this filing in order to prevent any delay in the progress of the AMI Project, and in order to meet the Commission's demand response goals. Full meter deployment is projected to begin as early as the second quarter of 2006. As stated in A.05-03-016 and consistent with the procedural approach outlined in the "Assigned Commissioner's Ruling Laying Out Approach to the Case, Scheduling a Pre-hearing Conference and Other Procedural Matters" in San Diego Gas & Electric Company's similar AMI proceeding (A.05-03-015), approval of these memorandum accounts and PG&E's A.05-03-016 is needed in order to ensure that necessary pre-deployment advanced metering infrastructure activities may continue without delay and without precluding rate recovery at a future date, after Commission review.

### **Proposed Preliminary Statements**

PG&E is requesting Commission authority to establish the Advanced Metering Infrastructure Memorandum Accounts for electric (AMIMA-E) and gas (AMIMA-G) to record all expenses incurred as a result of AMI Project activities prior to Commission approval of PG&E's full AMI Project Application. The proposed Preliminary Statements are attached.

PG&E has already requested recovery of \$49 million in pre-deployment expenditures for the period July 1 to December 31, 2005 through the cost recovery mechanism proposed in A.05-03-016. If the Commission approves

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<sup>2</sup> As previously stated in connection with its March 15 AMI Business Case filing, PG&E presently intends to file its AMI Project Application sometime in early summer of 2005.

A.05-03-016, PG&E will transfer the AMIMA-E and AMIMA-G balances, up to the expenditure level and for the periods approved in that Application, to the cost recovery mechanism approved in that Application. PG&E will request to recover any remaining balances in AMIMA-E and AMIMA-G through the cost recovery mechanism to be proposed in PG&E's upcoming AMI Project Application.

**Previous Request in the AMI Pre-Deployment Application 05-03-016**

This request does not supersede the cost recovery mechanism proposed in PG&E's AMI Pre-deployment Application (A.05-03-016) filed on March 15, 2005. This request is for authority to record all AMI Project-related costs in these memorandum accounts until PG&E's proposals in A.05-03-016 and the upcoming AMI Project Application are acted upon.

**Request for Commission Approval**

PG&E requests the Commission approve this Advice Letter, effective as of the filing date, on or before **May 13**, specifically finding that:

1. PG&E is authorized to establish new memorandum accounts, AMIMA-E and AMIMA-G, to record AMI costs incurred for the AMI Project in those accounts beginning as of the date of this filing, subject to future disposition by the Commission.
2. PG&E is authorized to seek recovery of the balances in the AMIMA-E and AMIMA-G through future AMI ratemaking mechanisms.

**Protests**

Due to the immediate need to ensure that necessary pre-deployment advanced metering infrastructure activities may continue without delay and without precluding rate recovery at a future date, after Commission review, PG&E respectfully requests expedited treatment of this advice filing and a limitation of the protest period such that the notice period for this filing be shortened from twenty days to ten (10) calendar days after the date of this filing, pursuant to General Order 96-A, Section IV-B Effective Date and Section XV-Exceptions. PG&E requests that anyone wishing to protest this filing do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than 10 days after the date of this filing, which is **May 23, 2005**. 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) and [jinj@cpuc.ca.gov](mailto:jinj@cpuc.ca.gov)

May 13, 2005

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

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: PGETariffs@pge.com

### **Effective Date**

In accordance with General Order 96-A, Section V.B., PG&E respectfully requests that this advice filing become effective as of the filing date, on May 13, 2005. This is needed in order to ensure that necessary pre-deployment advanced metering infrastructure activities may continue without delay and without precluding rate recovery at a future date, after Commission review.

### **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 Rose De La Torre at (415) 973-4716. Advice letter filings can also be accessed electronically at:

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

  
Director - Regulatory Relations

### **Attachments**

cc: Service List R.02-06-001

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39)**

Utility type:

☒ ELC

☒ GAS

☐ PLC

☐ HEAT

☐ WATER

Contact Person: Bernard Lam

Phone #: (415) 973-4878

E-mail: bxlc@pge.com

### EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2632-G/2664-E

Subject of AL: Proposal of Pacific Gas and Electric Company to Establish New Memorandum Accounts to Record Advanced Metering Infrastructure Costs

Keywords (choose from CPUC listing): Memorandum Account, Metering

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

N/A

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: Not applicable

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Resolution Required? ☒ Yes ☐ No

Requested effective date: 05/13/2005

No. of tariff sheets: 8

Estimated system annual revenue effect (%): \_\_\_\_\_

Estimated system average rate effect (%): \_\_\_\_\_

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Preliminary Statements, Table of Contents

Service affected and changes proposed<sup>1</sup>: \_\_\_\_\_

Pending advice letters that revise the same tariff sheets: \_\_\_\_\_

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

jjr@cpuc.ca.gov and jnj@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian K. Cherry

Director, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

<sup>1</sup> Discuss in AL if more space is needed.

**ATTACHMENT I  
ADVICE 2632-G**

| Cal. P.U.C.<br>Sheet No. | Title of Sheet                                                                                  | Cancelling Cal.<br>P.U.C. Sheet No. |
|--------------------------|-------------------------------------------------------------------------------------------------|-------------------------------------|
| 23152-G                  | Preliminary Statements -- Part BK -- Advanced Metering<br>Infrastructure Memorandum Account-Gas | NEW                                 |
| 23153-G                  | Preliminary Statements -- Part BK -- Advanced Metering<br>Infrastructure Memorandum Account-Gas | NEW                                 |
| 23154-G                  | Table of Contents -- Preliminary Statements --                                                  | 21966-G                             |
| 23155-G                  | Table of Contents -- Rate Schedules --                                                          | 23135-G                             |

**ATTACHMENT I  
ADVICE 2664-E**

| Cal. P.U.C.<br>Sheet No. | Title of Sheet                                                                                       | Cancelling Cal.<br>P.U.C. Sheet No. |
|--------------------------|------------------------------------------------------------------------------------------------------|-------------------------------------|
| 23441-E                  | Preliminary Statements -- Part DY -- Advanced Metering<br>Infrastructure Memorandum Account-Electric | NEW                                 |
| 23442-E                  | Preliminary Statements -- Part DY -- Advanced Metering<br>Infrastructure Memorandum Account-Electric | NEW                                 |
| 23443-E                  | Table of Contents -- Preliminary Statements --                                                       | 23419-E                             |
| 23444-E                  | Table of Contents -- Rate Schedules --                                                               | 23420-E                             |



PRELIMINARY STATEMENT

BK. ADVANCED METERING INFRASTRUCTURE MEMORANDUM ACCOUNT-GAS (AMIMA-G)

(N)

1. **PURPOSE:** The purpose of the Advanced Metering Infrastructure Memorandum Account-Gas (AMIMA-G) is to record and recover the incremental Operations and Maintenance (O&M) and Administrative and General (A&G) expenditures and capital-related costs incurred for an Advanced Metering Infrastructure (AMI) Project.
2. **APPLICABILITY:** The AMIMA-G applies to all customer classes, except for those specifically excluded by the Commission.
3. **RATES:** The current AMIMA-G does not have a rate component.
4. **ACCOUNTING PROCEDURE:** PG&E shall maintain the AMIMA-G by making entries to this account at the end of each month as follows:
  - a. A debit entry equal to PG&E's incremental O&M and A&G expenses and capital-related costs incurred for the AMI Project. These capital, O&M and A&G costs may relate to numerous activities or organizations, including but not limited to the following areas:
    - AMI project management, including contract management and development, communications, budget and accounting management, human resource management, process redesign, and other related areas
    - Communication systems, including network controllers and telecommunications links
    - Customer outreach and customer care
    - Data collector hardware and software
    - Development of training materials and procedures
    - Evaluation and planning
    - Facilities
    - Gas and electric meters, transmitting modules, and related equipment
    - Logistics management tools and activities
    - Meter installation, including customer data exceptions processing
    - Network operations staff
    - Operations center hardware and systems
    - Site surveys and development
    - System design, programming, and other upgrades/enhancements for integrated systems including billing, records, customer information and other information systems using meter information
    - Technical support staff and operations
    - Testing of systems and processes
    - Training

(N)

(Continued)



PRELIMINARY STATEMENT  
(Continued)

BK. ADVANCED METERING INFRASTRUCTURE MEMORANDUM ACCOUNT-GAS (AMIMA-G)  
(Cont'd.)

(N)

4. ACCOUNTING PROCEDURE: (Cont'd.)

b. 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.

5. DISPOSITION: Upon Commission approval of a cost recovery mechanism in the AMI Pre-deployment Application (A.05-03-016) or another proceeding determined by the Commission, such as PG&E's AMI Project Application, PG&E will transfer the costs, not to exceed the approved expenditure level, from the AMIMA-G to the GAMA to be recovered via the mechanism as set forth in A.05-03-016 or such other account as may be approved by the Commission at that time.

(N)



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| Part AO  | Not Being Used                                                |                              |
| Part AP  | Not Being Used                                                |                              |
| Part AQ  | Pipeline Expansion Balancing Account.....                     | 16519 to 16521-G             |
| Part AR  | Demand-Side Management Tax Change Memorandum Account.....     | 16502-G                      |
| Part AS  | Not Being Used                                                |                              |
| Part AT  | Not Being Used                                                |                              |
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| Part AV  | Capital Audit Consultant Cost Memorandum Account .....        | 20432-G                      |
| Part AW  | Self-Generation Program Memorandum Account .....              | 20984-G                      |
| Part AX  | Food Service Technology Center Memorandum Account .....       | 20987-G                      |
| Part AY  | Baseline Balancing Account .....                              | 21051-G                      |
| Part AZ  | El Paso Turned-Back Capacity Balancing Account .....          | 21378 to 21380-G             |
| Part BC  | Financial Hedging Memorandum Account .....                    | 21818-G                      |
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## RATE SCHEDULES

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| GTL      | Mobilehome Park CARE Program Service .....            | 23127,23128,23033-G     |
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PRELIMINARY STATEMENT

DY. ADVANCED METERING INFRASTRUCTURE MEMORANDUM ACCOUNT-ELECTRIC (AMIMA-E)

(N)

1. **PURPOSE:** The purpose of the Advanced Metering Infrastructure Memorandum Account-Electric (AMIMA-E) is to record and recover the incremental Operations and Maintenance (O&M) and Administrative and General (A&G) expenditures and capital-related costs incurred for an Advanced Metering Infrastructure (AMI) Project.
2. **APPLICABILITY:** The AMIMA-E applies to all customer classes, except for those specifically excluded by the Commission.
3. **RATES:** The current AMIMA-E does not have a rate component.
4. **ACCOUNTING PROCEDURE:** PG&E shall maintain the AMIMA-E by making entries to this account at the end of each month as follows:
  - a. A debit entry equal to PG&E's incremental O&M and A&G expenses and capital-related costs incurred for the AMI Project. These capital, O&M and A&G costs may relate to numerous activities or organizations, including but not limited to the following areas:
    - AMI project management, including contract management and development, communications, budget and accounting management, human resource management, process redesign, and other related areas
    - Communication systems, including network controllers and telecommunications links
    - Customer outreach and customer care
    - Data collector hardware and software
    - Development of training materials and procedures
    - Evaluation and planning
    - Facilities
    - Gas and electric meters, transmitting modules, and related equipment
    - Logistics management tools and activities
    - Meter installation, including customer data exceptions processing
    - Network operations staff
    - Operations center hardware and systems
    - Site surveys and development
    - System design, programming, and other upgrades/enhancements for integrated systems including billing, records, customer information and other information systems using meter information
    - Technical support staff and operations
    - Testing of systems and processes
    - Training

(N)

(Continued)



Pacific Gas and Electric Company  
San Francisco, California

Cancelling

Original

Cal. P.U.C. Sheet No.  
Cal. P.U.C. Sheet No.

23442-E

PRELIMINARY STATEMENT  
(Continued)

DY. ADVANCED METERING INFRASTRUCTURE MEMORANDUM ACCOUNT-ELECTRIC (AMIMA-E)  
(Cont'd.)

(N)

4. ACCOUNTING PROCEDURE: (Cont'd.)

- b. 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.

5. DISPOSITION: Upon Commission approval of a cost recovery mechanism in the AMI Pre-deployment Application (A.05-03-016) or another proceeding determined by the Commission, such as PG&E's AMI Project Application, PG&E will transfer the costs, not to exceed the approved expenditure level, from the AMIMA-E to the AMDRA to be recovered via the mechanism as set forth in A.05-03-016 or such other account as may be approved by the Commission at that time.

(N)

Advice Letter No. 2664-E  
Decision No.

100398

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

Date Filed May 13, 2005  
Effective \_\_\_\_\_  
Resolution No. \_\_\_\_\_



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## RATE SCHEDULES

| SCHEDULE              | TITLE OF SHEET                                                                        | CAL P.U.C.<br>SHEET NO.                                                                                                                                                   |
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