

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



May 31, 2006

Advice Letter 2673-G/2732-E

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

**RECEIVED**  
REGULATORY RELATIONS DEPARTMENT  
JUN 6 2006

Subject: Recovery of 2005 – 2006 Self Generation Incentive Program costs

Dear Ms de la Torre:

Advice Letter Advice Letter 2673-G/2732-E is withdrawn by your letter dated February 17, 2006. A copy of the advice letter is returned herewith for your records.

Sincerely,

A handwritten signature in black ink, appearing to read "S. H. Gallagher".

Sean H. Gallagher, Director  
Energy Division

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



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Sincerely,

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Sean H. Gallagher, Director  
Energy Division



**Pacific Gas and  
Electric Company**<sup>®</sup>

**Brian K. Cherry**  
Director  
Regulatory Relations

77 Beale Street, Room 1087  
San Francisco, CA 94105

*Mailing Address*  
Mail Code B10C  
Pacific Gas and Electric Company  
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November 9, 2005

**Advice 2673-G/2732-E**  
(Pacific Gas and Electric Company ID 39M)

**Subject: Recovery of 2005 - 2006 Self Generation Incentive Program (SGIP) Costs, Approval of SGIP Revenue Requirement and Future SGIP Cost Recovery Methodology (Revises Electric Preliminary Statement Parts BY and CZ, and Gas Preliminary Statement Parts F, J, and AW)**

Public Utilities Commission of the State of California

Pacific Gas and Electric Company (PG&E) hereby submits for filing revisions to its gas and electric tariffs. The affected tariff sheets are listed on the enclosed Attachment I.

### **Purpose**

Pursuant to Decision (D.) 05-06-029 and in response to Draft Resolution E-3956 on PG&E's 2006 Annual Electric True-up advice letter, PG&E is filing this advice letter to request Commission approval and recovery of Self Generation incentive Program (SGIP) gas and electric costs for the period July 1, 2005, through December 31, 2005, and approval to include in gas and electric rates a forecast of the 2006 SGIP budget.

This filing also seeks approval for PG&E to include subsequent requests for recovery of SGIP costs directly through its Annual Electric True-up (AET) and Annual Gas True-up (AGT) advice filings, beginning in 2007.<sup>1</sup> This will provide some consistency between SGIP gas and electric cost recovery, and eliminate advice letter redundancy and lagged recovery of costs, which now have a significant impact on customer's rates.

Specifically, for the period July 1, 2005, through December 31, 2005, PG&E requests recovery of \$29.68 million of SGIP electric costs and \$3.84 million of SGIP gas costs.<sup>2</sup> These amounts are based on recorded costs through October 2005 and forecast costs for November and December 2005.<sup>3</sup> For 2006, PG&E

<sup>1</sup> For example, in the 2007 AET and 2007 AGT PG&E will request a January 1, 2007, rate adjustment, which will include a forecast 2007 SGIP budget and the amortization of the 2006 SGPMA balance.

<sup>2</sup> All cost data includes franchise fees and uncollectibles (FF&U) where applicable.

<sup>3</sup> At the time of this advice letter filing recorded SGPMA costs were available through October 31, 2005. When the 2006 Annual Gas True-up (AGT) advice letter is filed, the request for 2005 costs will consist of

forecasts its SGIP budget to be \$55 million of the \$60 million authorized annually in D.01-03-073 and D.04-12-045. Using the allocation of costs between gas and electric customers adopted in D.01-03-073, PG&E's 2006 SGIP electric budget is \$46.2 million and the 2006 SGIP gas budget is \$8.8 million.<sup>4</sup> Although the budget is proposed as a revenue requirement for the purpose of setting rates, PG&E will continue to record actual costs associated with the SGIP in its approved gas and electric Self Generation Program Memorandum Account (SGPMA).

In compliance with D.05-06-029 (PG&E 2004 BCAP), PG&E requests that Energy Division review recorded costs and the forecast 2006 SGIP budget before December 15, 2005, as part of this resolution to allow for recovery in rates starting January 1, 2006. Alternatively, PG&E requests authorization to include the forecast 2006 SGIP budget in January 1, 2006 gas and electric rates. PG&E's request is consistent with Commission decisions and the recovery of these costs by other California utilities.<sup>5</sup> It was the Legislature's and the Commission's intent, when mandating the program, to provide PG&E with timely cost recovery for the SGIP.

PG&E requests that this advice letter be approved by **December 9, 2005**, but no later than December 15, 2005 in time to incorporate approved 2005 costs and the 2006 SGIP budget into gas and electric rates effective January 1, 2006.

Finally, to implement these requests, PG&E asks for approval of revisions to electric Preliminary Statement Part BY and gas Preliminary Statement Part AW—*Self Generation Program Memorandum Account (SGPMA)* as well as revisions to electric Preliminary Statement Part CA—*Distribution Revenue Adjustment Mechanism (DRAM)* and gas Preliminary Statement Part F—*Core Fixed Cost Account (CFCA)*, Part J—*Noncore Customer Class Charge Account (NCA)*.. PG&E also is revising the electric and gas SGPMA to reflect the decision of the SGIP Working Group that any forfeited SGIP application fees will be added to the SGIP incentive budget.

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recorded costs through September 30, 2005, and forecast through December 31, 2005. When the 2006 annual Electric True-up (AET) advice letter was filed, the request for 2005 costs consisted of recorded costs through July 31, 2005, and forecasted costs through December 31, 2005.

<sup>4</sup> Presently, 84 percent of SGIP costs are allocated to electric customers and 16 percent allocated to gas customers. See the "Background" and "2006 SGIP Revenue Requirement" sections in this advice letter for additional information on the 2006 budget and the gas and electric split.

<sup>5</sup> Southern California Edison Company recovers their prospective SGIP authorized budget annually as a revenue requirement in their Other Distribution Adjustment Mechanism (ODAM) balancing account, which is trued up annually in the Energy Resources Recovery Account (ERRA). (See Application 05-08-002). San Diego Gas and Electric Company recovers SGIP costs in the consolidation of its Rewards and Penalties Balancing Account (RPBA) – gas and electric, which is trued-up annually in the Electric and Gas Regulatory Account filed annually in October. (See Advice 1720-E/1549-G, approved by letter on September 15, 2005) Southern California Gas Company recovers annual SGIP costs in its Annual Regulatory Account Balances Update, filed each October. (See AL 3416, approved December 9, 2004).

## **Background**

The SGIP is a mandated program under which the Commission directed California utilities to provide incentives for the installation of qualifying on-site distributed generation facilities, including clean and/or renewable technologies. The changes requested in this advice letter will simplify and unify the current discrete and independent recovery of the same program costs, which are allocated between gas and electric customers. Now that these costs have become significant and will continue to be significant, timely recovery is critical.

In D.01-03-073, the Commission implemented Assembly Bill (AB) 970 and established the SGIP. Subsequently, the SGIP was extended and modified by AB 1685; the CPUC implemented the legislation in D.04-12-045. Through these decisions, the Commission ordered PG&E to establish the SGIP for years 2001 through 2007 and authorized PG&E to spend \$60 million annually, or \$420 million in total for the seven year program.

In addition, the Commission provided a mechanism for recovering program costs. In D.01-03-073 the Commission stated:

“We direct [PG&E and SCE] to increase their distribution revenue requirement...to reflect today’s authorized budgets. On the gas side, PG&E...should include the costs of these programs in their next gas rate recovery proceedings, e.g., the Biennial Costs Adjustment Proceedings.... PG&E shall present specific factors they use to allocate self-generation program budgets between their electric and gas customers. These factors shall reflect the current allocation of energy efficiency programs between these customers. Utilities shall establish memorandum accounts to track all program costs and benefits by customer class.” (See pages 12-13, and IO 2.)<sup>6</sup>

Decision 03-12-035, which adopted PG&E’s bankruptcy settlement, affected the recovery mechanism for the electric portion of the SGPMA. As required by D.03-12-035, PG&E filed Advice 2555-G/2521-E on June 14, 2004, providing its 2003 headroom calculation. This headroom advice letter showed electric SGPMA entries of \$7.8 million in 2002 and \$19.2 million in 2003, for a total end-of-year 2003 SGPMA electric balance of \$27 million. Although Advice 2555-G/2521-E is still pending, PG&E has transferred \$27 million from the SGPMA electric account to the Headroom Account for recovery.

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<sup>6</sup> After D.01-03-073 was issued, D.01-07-128 and D.01-09-012 reaffirmed the use of a memorandum account to track costs during the rate freeze and reaffirmed that the SGIP program costs are to be recoverable in distribution rates.

Decision 04-12-045 states:

“Program costs will continue to be included in utility distribution revenue requirements. The utility will track these costs in the SGIP memorandum accounts created by Decision (D.) 01-03-073 for recovery in their respective general rate cases or other authorized proceedings.” (p. 2)

Decision 05-06-029 (PG&E 2004 BCAP) established the SGPMA-gas cost allocation among customers and directed cost recovery to the annual advice letter process:

“PG&E should be required to allocate SGIP costs to all customer classes on an equal cents per therm basis. It should seek recovery of SGIP costs as part of its annual advice letter process, as it requests, except that in future funding periods, PG&E may not recover SGIP costs prior to a Commission review or audit of SGIP expenditures.” (Conclusion of Law 5)

Also, pursuant to D.05-06-029, on July 1, 2005, PG&E began recovery in rates of \$14.9 million of SGIP gas costs, as recorded and forecasted through June 30, 2005. (See Decision, page 2.) The 2004 BCAP decision accepted the PG&E SGIP recovery request and the Office of Ratepayer Advocate (ORA) review of the account.<sup>7</sup> (See Decision, page 19.)

PG&E filed Advice 2580-E on November 5, 2004, requesting recovery of \$35.6 million in electric SGIP expenditures recorded through October 31, 2004. Resolution E-3944 dated July 21, 2005, approved PG&E’s cost recovery request, recognized the review of SGIP costs through June 30, 2005, by ORA for the 2004 BCAP,<sup>8</sup> and directed PG&E to include the costs through October 2004 in the 2006 AET. (See Findings 5 -10.) Resolution E-3944 was issued eight months after it was filed, resulting in a lag in 2004 SGIP cost recovery. This lag prompted PG&E to explore a more proactive and streamlined approach to SGIP recovery, as requested in this advice letter.

On September 1, 2005, PG&E filed the 2006 Annual AET Advice 2706-E. In the AET PG&E requested recovery of \$96.1 million in 2004 and 2005 SGIP electric costs.<sup>9</sup> PG&E also included \$46.2 million, the electric portion of the forecast 2006

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<sup>7</sup> The 2004 BCAP was filed on July 30, 2004, and requested SGPMA costs as recorded through May 31, 2004, and forecast through June 30, 2005. When ORA reviewed the account they reviewed recorded costs through August 2004 and forecast through June 30, 2005. The 2004 BCAP SGPMA data was updated in May of 2005 but because the forecast was tracking closely to the actual cost accrual, no further review was requested by ORA.

<sup>8</sup> SGIP costs are allocated between the SGPMA gas and electric accounts based on a percent split of total program costs. Therefore, any review of SGIP costs is implicitly a review of total program costs, regardless of the split in costs between SGPMA gas and electric accounts.

<sup>9</sup> The \$96.1 million includes costs through October 31, 2004, authorized for recovery in Resolution E-3944, recorded costs from November 1, 2004, through July 31, 2005, and forecast costs from August 1, 2005, through December 31, 2005.

SGIP budget, in the 2006 revenue requirement. (See "2006 Annual Electric True-up" and "2006 SGIP Revenue Requirement" below for additional information.)

On November 2, 2005, Energy Division issued Draft Resolution E-3956 in the 2006 AET, accepting SGPMA electric costs through October 31, 2004, as approved in Resolution E-3944. The draft resolution directed PG&E to make a separate request for the Commission to review and authorize recovery in rates any SGPMA amounts after October 31, 2004. The draft resolution also denies without prejudice PG&E's request to recover forecasted SGIP costs for 2006, pending Commission review of PG&E's proposal to modify the SGPMA to allow it to establish an authorized forecasted revenue requirement. (See Draft Resolution E-3956, page 2.) PG&E is filing this advice letter in part as a response to the 2006 AET Draft Resolution. In addition, PG&E will file comments on Draft Resolution E-3956, asking the Commission to revise the final resolution to allow recovery of the electric portion of SGIP costs for the period from November 1, 2004, through June 30, 2005, which are already reviewed by ORA and approved by D.05-06-029, and recognized in Resolution E-3944. PG&E began recovery of the gas portion of these program costs on July, 1, 2005, through the 2004 BCAP decision described above.

PG&E will file its Annual Gas True-up (AGT) advice letter no later than November 17, 2005, and will include \$3.84 million of recorded SGIP gas costs from July 1, 2005 through September 30, 2005, and forecast costs from November 1, 2005 through December 31, 2005. PG&E will also request \$8.8 million, the gas portion of the forecast 2006 SGIP budget, in the 2006 revenue requirement. (See "2006 SGIP Revenue Requirement" and "2006 Annual Gas True-up" below for more information on the 2006 AGT.)

### **2006 Annual Electric True-up**

The AET advice filing provides the annual vehicle to recover balances in electric accounts already approved for amortization, and to consolidate authorized changes to rates starting on January 1 of each year.

PG&E has included in Advice 2706-E, the 2006 AET, recorded SGPMA electric costs for 2004, recorded costs through July 2005 and forecasted costs through December 31, 2005. (See Table 1, page 4, of PG&E's 2006 AET.) These costs total \$96.1 million and include those approved in Resolution E-3944 (\$36 million), those reviewed by ORA as part of the 2004 BCAP proceeding (\$30.5), and remaining recorded and forecast 2005 SGIP costs that PG&E believes are authorized for recovery by D.01-03-073 and D.04-12-045 (\$29.7 million). PG&E has also included in the AET (see Table 2, page 11 of PG&E's 2006 AET) \$46.2 million, which is the electric portion of the 2006 SGIP budget (PG&E describes the forecast 2006 SGIP budget in the "2006 SGIP Revenue Requirement" section below).

PG&E seeks authority by this advice letter to recover July – December 2005 SGIP electric costs, \$29.7 million, the amount in Table 1 of the AET not yet reviewed by ORA, and currently denied in the Draft Resolution E-3956.<sup>10</sup> PG&E also seeks authority by this advice letter to recover \$46.2 million the amount in Table 2, the electric portion of the forecast 2006 SGIP budget.

No incremental change in electric rates already proposed in the AET will result from approval of this advice filing since all of the amounts discussed here were already proposed in Tables 1 and 2 of the AET.

### **2006 Annual Gas True-up**

The AGT advice filing provides the annual vehicle to recover balances in gas accounts already approved for amortization, and to consolidate authorized changes to rates starting on January 1 of each year.

As stated above, PG&E will file its 2006 AGT advice letter by November 17, 2005. PG&E will include SGPMA gas costs of \$3.84 million, which includes the recorded September 2005 SGPMA gas balance and forecasted SGIP gas activity for November 2005 and December 2005. PG&E will also include the gas portion of the forecast 2006 SGIP budget, \$8.8 million, as described below.

PG&E seeks authority in this advice letter to recover \$3.84 million, the remaining 2005 SGIP gas costs and \$8.8 million, the gas portion of the forecast 2006 SGIP budget, to be requested in the AGT for recovery in rates beginning on January 1, 2006.

Prior to gas and electric rate changes effective January 1, 2006, PG&E will update the AET and AGT for any final Commission decisions in various outstanding proceedings and approval of pending advice filings.

### **Future SGIP Cost Recovery and the SGIP Revenue Requirement**

PG&E would like to clarify and simplify and the process for recovering SGIP costs by establishing the AET and AGT as the regulatory vehicles for future SGIP cost recovery. Requiring PG&E to make separate requests for SGIP cost recovery, in addition to including them in the AET and AGT, is redundant, creates additional work for PG&E and Energy Division, and subjects these costs to lagged recovery. PG&E believes Commission review of the recorded and forecast SGIP costs, requested for recovery in the AET and AGT, can be completed in conjunction with these annual filings. Therefore, PG&E asks authority to request future recorded and forecast SGIP costs directly in the AET and AGT.<sup>11</sup>

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<sup>10</sup> PG&E will seek authority in the final resolution of the 2006 AET to recover \$30.5 million, the costs between November 1, 2004 and June 30, 2005, which have been reviewed by ORA. In any event, PG&E would support the approval of the costs herein if Energy Division finds resolution more appropriate.

<sup>11</sup> D.05-06-029 already directs PG&E to recover future costs in the annual advice letter process. PG&E requests that this advice letter uphold D.05-06-029.

Decisions 01-03-073 and 04-12-045 clearly authorize the establishment of a SGPMA revenue requirement. PG&E requests to establish the SGPMA revenue requirement as the forecast of the next year SGIP budget. PG&E believes that the use of a forecast is superior to the use of the annual authorized amount as it will allow for recovery of costs at a rate that matches as closely as possible to the accrual of costs on PG&E's books. PG&E believes that including a forecast budget does not hamper the Commission's authority to review program costs. Allowing a forecast to be put into rates is a common practice for accounts amortized in the AET and AGT and was accepted for the SGIP by the Commission in the PG&E 2004 BCAP and in filings by other California utilities requesting recovery of SGIP costs. Therefore, this request does not establish a new precedent.

### **2006 SGIP Revenue Requirement**

PG&E forecasts the 2006 SGIP budget to be \$55 million of the \$60 million authorized to be spent each year. PG&E based the \$55 million on the level of incentive expenditures and other program costs in 2004 and 2005.<sup>12</sup> PG&E estimates that the program costs in 2006 will be similar to 2004 and 2005. As described above, D.01-03-073 adopted an allocation of SGIP costs between gas and electric customers based on the allocation of energy efficiency costs. Using this methodology, 84 percent of SGIP costs currently are allocated to electric customers and 16 percent allocated to gas customers. This results in a 2006 SGIP electric revenue requirement of \$46.2 million and a 2006 SGIP gas revenue requirement of \$8.8 million.

### **Preliminary Statements Revisions**

PG&E proposes to modify SGPMA electric Preliminary Statement Part BY and gas Preliminary Statement Part AW, respectively, to record entries equal to the electric portion of SGIP costs recovered through electric Preliminary Statement Part CZ--*Distribution Revenue Adjustment Mechanism (DRAM)* in the AET; and entries equal to the gas portion of SGIP costs recovered through gas Preliminary Statement, Part F--*Core Fixed Cost Account (CFCA)*, and Part J--*Noncore Customer Class Charge Account (NCA)*, in the AGT. Additional modifications are made to the gas and electric SGPMA to ensure consistent recovery of SGIP costs, along with conforming changes to gas Preliminary Statements Parts F and J, and electric Preliminary Statement Part CZ.

This filing also includes changes to the SGPMA gas and electric accounts so that forfeited SGIP Application Fees now will be added to the SGIP incentive budget. As background, in D.01-03-073 the Commission ordered the formation of the SGIP Working Group. (D.01-03-073, page 38 and IO 16) In D.04-12-045, the CPUC directed the SGIP Working Group to develop appropriate procedural or financial

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<sup>12</sup> In 2004 SGIP costs were \$54.4 million. PG&E forecasts that the final 2005 SGIP costs will be close to \$55 million.

mechanisms to deter inappropriate reservation requests, or "phantom projects" (D.04-12-045, p. 24). Additional clarification was given in an e-mail dated June 20, 2005, from ALJ Malcolm to the service list for R.04-03-017 confirming the SGIP Working Group's authority to impose an Application Fee. The Working Group implemented an Application Fee process for the SGIP in August 2005. This Application Fee is applicable to new projects and implemented retroactively for Program Year 2005, SGIP Level 1 Wait List Applications. As agreed to by the SGIP Working Group, all forfeited Application Fees will be added to the Program Administrator's incentive budget.

### **Effective Date**

In order to remain synchronized with the regulatory schedules of the AET and AGT, PG&E requests that the Commission approve this filing on **December 9, 2005**, but in any event no later than December 15, 2005, in order that the proposed changes in this filing may be implemented effective January 1, 2006 concurrent with the AET and AGT changes.

### **Protests**

Anyone may protest this advice filing by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than 20 days after the date of this filing, which is **November 29, 2005**. Protests should be mailed to:

CPUC Energy Division  
Attention: Tariff Unit, 4<sup>th</sup> Floor  
505 Van Ness Avenue  
San Francisco, California 94102  
Facsimile: (415) 703-2200  
E-mail: [jjr@cpuc.ca.gov](mailto:jjr@cpuc.ca.gov) and [jnj@cpuc.ca.gov](mailto:jnj@cpuc.ca.gov)

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 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](mailto:PGETariffs@pge.com)

**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 lists for the Distributed Generation Rulemaking (R.) 04-03-017 and the 2004 Biennial Cost Allocation Proceeding (BCAP) Application (A.) 04-07-044. Address changes should be directed to Rose de la Torre at (415) 973-4716. Advice letter filings also can be accessed electronically at:

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

*Brian K. Cherry /sr*

Director, Regulatory Relations

cc: Service Lists – R.04-03-017, A.04-07-044

# 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 U39

Utility type:

ELC       GAS  
 PLC       HEAT     WATER

Contact Person: Sue Shaw

Phone #: (415) 973-7375

E-mail: sxs9@pge.com

**EXPLANATION OF UTILITY TYPE**

(Date Filed/ Received Stamp by CPUC)

ELC = Electric      GAS = Gas  
PLC = Pipeline      HEAT = Heat    WATER = Water

Advice Letter (AL) #: **2673-G/2732-E**

Subject of AL: Request for Approval of 2006 Self-Generation Incentive Program (SGIP) Cost Recovery and Electric Revenue Requirements

Keywords (choose from CPUC listing): \_\_\_\_\_

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

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

Decision 01-03-073

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

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

Resolution Required?  Yes  No

Requested effective date: **12-9-05**

No. of tariff sheets: **13**

Estimated system annual revenue effect: (%): \$46.2 million for 2006 electric SGIP and \$8.8 million for gas SGIP

Estimated system average rate effect (%): Proposed SGIP costs will be combined with True-up and other costs in separate advice filings for gas and electric rates effective January 1, 2006

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). See above

Tariff schedules affected: Electric Preliminary Statement Parts BY and CZ; gas Preliminary Statements Parts F, J and AW

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**

**Utility Info (including e-mail)**

**505 Van Ness Ave.,  
San Francisco, CA 94102**

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

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

**ATTACHMENT I  
ADVICE 2673-G**

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal P.U.C. Sheet No.
23534-G	Preliminary Statement Part F—Core Fixed Cost Account	23355-G
23535-G	Preliminary Statement Part J—Noncore Customer Class Charge Account	23271-G
23536-G	Preliminary Statement Part AW—Self Generation Program Memorandum Account	23284-G
23537-G	Preliminary Statement Part AW (Cont'd)	--
23538-G	Table of Contents (Cont'd)— Preliminary Statements (Cont'd)	22707-G
23539-G	Table of Contents (Cont'd)— Preliminary Statements (Cont'd)	23508-G
23560-G	Table of Contents	23510-G

**ADVICE 2732-E**

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal P.U.C. Sheet No.
23988-E	Preliminary Statement Part BY—Self Generation Program Memorandum Account	18777-E
23989-E	Preliminary Statement Part BY (Cont'd)	--
23990-E	Preliminary Statement Part CZ—Distribution Revenue Adjustment Mechanism	22718-E
23991-E	Table of Contents - Preliminary Statements (Cont'd)	23416-E
23992-E	Table of Contents - Preliminary Statements (Cont'd)	23960-E
23993-E	Table of Contents	23962-E



PRELIMINARY STATEMENT  
(Continued)

F. CORE FIXED COST ACCOUNT (CFCA) (Cont'd.)

6. ACCOUNTING PROCEDURE: (Cont'd.)

b. Core Cost Subaccount (Cont'd.)

- 4) a debit entry equal to one-twelfth of the core portion of the authorized local transmission revenue requirement, excluding the allowance for F&U;
- 5) A debit or credit entry, as appropriate, to record the transfer of amounts from other accounts to this subaccount for recovery in rates, upon approval by the CPUC;
- 6) an entry equal to 70.03 percent of the local transmission revenue shortfall or over-recovery resulting from a change in customers qualifying for backbone-level end-use service, and associated throughput reduction or increase, as applicable;
- 7) a monthly debit entry equal to one-twelfth of the core portion of the current year Self Generation Incentive Program (SGIP) costs authorized by the CPUC in the AGT, or as otherwise authorized by the CPUC. (N)  
|  
(N)
- 8) a debit or credit entry equal to any expense adopted by the CPUC as a cost to be recovered in this subaccount; and (T)
- 9) an entry equal to interest on the average of the balance in the account at the beginning of the month and the balance in the account after entries F.6.b.1 through F.6.b.8 above, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. (T)  
(T)



PRELIMINARY STATEMENT  
(Continued)

J. NONCORE CUSTOMER CLASS CHARGE ACCOUNT (NCA) (Cont'd.)

6. ACCOUNTING PROCEDURE: (Cont'd.)

c. Noncore Subaccount

The following entries will be made to this subaccount each month:

- 1) a debit entry equal to the noncore portion of intervenor compensation and any other expense adopted by the CPUC as a cost to be included in this subaccount;
- 2) a credit entry equal to the NCA revenue not recorded to J.6.a or J.6.b, above, excluding the allowance for F&U;
- 3) an entry equal to the adopted balances transferred to this subaccount in the Annual Gas True-up or at other times, as ordered by the CPUC;
- 4) a monthly debit entry equal to one-twelfth of the noncore portion of the current year Self Generation Incentive Program (SGIP) costs authorized by the CPUC in the AGT, or as otherwise authorized by the CPUC. (N)  
|  
(N)
- 5) an entry equal to 29.97 percent of the local transmission revenue shortfall or over-recovery resulting from a change in customers qualifying for backbone-level end-use service, and associated throughput reduction or increase, an applicable; and (T)
- 6) an entry equal to interest on the average of the balance in the subaccount at the beginning of the month and the balance after entries from J.6.c.1 through J.6.c.5, above, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. (T)

d. Interim Relief Subaccount

The following entries will be made to this subaccount each month:

- 1) a one-time entry equal to the noncore distribution portion of the gas revenue requirement adopted in GRC Decision 04-05-055, from January 1, 2003 to the implementation date, including interest, and excluding the allowance for F&U.
- 2) an entry equal to any other amounts adopted by the CPUC to be included in this subaccount;
- 3) a monthly credit equal to the revenue to amortize the balances in this subaccount, excluding the allowance for F&U; and
- 4) an entry equal to interest on the average of the balance in the account at the beginning of the month and the balance in the account after entries J.6.d.1 through J.6.d.3, above, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.



PRELIMINARY STATEMENT  
(Continued)

AW. SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA)

1. PURPOSE:

The purpose of the SGPMA is to track the costs incurred by PG&E for implementing self-generation programs authorized by Decisions 01-03-073, 01-07-028, 01-09-012, 02-02-026 and 04-12-045. Qualifying self-generation is defined as distributed generation technologies (microturbines, small gas turbines, wind turbines, photovoltaics, fuel cells and internal combustion engines, and combined heat and power or cogeneration) installed on the customer's side of the utility meter that provides electricity for all or a portion of that customer's electric load. The Self-Generation Incentive Program (SGIP) provides incentives to customers installing certain self-generation facilities. The self-generation program budget shall be allocated between electric and gas customers to reflect the current allocation of energy efficiency programs. As authorized in PG&E's Biennial Cost Allocation Proceeding Decision 05-06-029, the balance in this account will be recovered from all gas transportation customers in the Annual Gas True-up of Balancing Accounts advice letter (AGT), or other advice filing, after a Commission review or audit of the self-generation incentive program expenditures.

(T)  
  
(T)  
|  
(T)  
  
(T)

As authorized in Decisions 01-03-073 and 04-12-045, the SGIP program costs will be included in utility distribution revenue requirements.

(N)  
|

As authorized in Decision 04-12-045 and agreed to by the SGIP Working Group, all forfeited Application Fees will be re-allocated to the Program Administrator's incentive budget.

(N)  
|

2. APPLICABILITY:

The SGPMA shall apply to all customer classes, except for those specifically excluded by the CPUC.

3. REVISION DATE:

Disposition of the balance in this account shall be determined in the Annual Gas True-up (AGT) advice letter, or as otherwise authorized by the Commission.

(T)  
(T)

4. RATES:

The SGPMA does not have a rate component.

5. ACCOUNTING PROCEDURE:

PG&E shall maintain the SGPMA by making entries as follows:

- a. A monthly debit entry for the gas portion of administrator costs, including program design, contract administration, marketing, regulatory reporting, and program evaluation.

(T)  
  
(L)  
|  
(L)

(Continued)



PRELIMINARY STATEMENT  
(Continued)

AW. SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA) (Cont'd.)

5. ACCOUNTING PROCEDURE: (Cont'd.)

- |    |  |                       |     |
|----|--|-----------------------|-----|
| b. | A monthly debit entry for the gas portion of incentive payments to customers or contractors for services rendered. The total costs recorded to this entry and entry 5.a. above, plus the costs allocated to electric customers and recorded in the electric SGPMA (electric Preliminary Statement Part BY), are not to exceed the total funding authorized for this program in Decisions 01-03-073 and 04-12-045, plus any forfeited Application Fees. | (T)<br><br>(T)<br>(T) | (L) |
| c. | A monthly credit entry equal to one-twelfth of the gas portion of the current year SGIP costs as authorized by the CPUC in the AGT (a monthly debit equal to this total amount is divided as appropriate between core and noncore and recorded in the CFCA and the NCA), or as otherwise authorized by the CPUC.   | (N)<br> <br>(N)       |     |
| d. | An annual debit or credit entry to transfer all or a portion of the balance in the SGPMA to the CFCA and NCA, for rate recovery as approved by the CPUC in the AGT or as otherwise authorized by the CPUC.   | (T)<br> <br>(T)       |     |
| e. | A monthly entry equal to the interest on the average of the balance at the beginning of the month and the balance after the entries 5.a. through 5.d., above, 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.   | (T)<br>(T)            | (L) |



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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	
Part AU	Allocation of Residual Costs Memorandum Account.....	19933,19934-G
Part AV	Capital Audit Consultant Cost Memorandum Account.....	20432-G
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Part AX	Food Service Technology Center Memorandum Account.....	20987-G
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Part AZ	Not Being Used	
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Part BC	Financial Hedging Memorandum Account (FHMA) .....	21818-G
Part BD	Not Being Used	
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Part L	Balancing Charge Account.....	22031,22032-G	
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RATE SCHEDULES

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GTL	Mobilehome Park CARE Program Service .....	23500,23501,23502-G
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G-NT	Gas Transportation Service to Noncore End-Use Customers .....	22892,23286,22037,22038-G
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PRELIMINARY STATEMENT  
(Continued)

BY. SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA)

1. PURPOSE:

The purpose of the SGPMA is to track the costs incurred by PG&E for implementing the self-generation program authorized by Decisions 01-03-073, 01-07-028, 01-09-012, 02-02-026, and 04-12-045. Qualifying self-generation is defined as distributed generation technologies (microturbines, small gas turbines, wind turbines, photovoltaics, fuel cells and internal combustion engines, and combined heat and power or cogeneration) installed on the customer's side of the utility meter that provides electricity for all or a portion of that customer's electric load. The Self-Generation Incentive Program (SGIP) provides incentives to customers installing certain self-generation facilities. The self-generation program budget shall be allocated between electric and gas customers to reflect the current allocation of energy efficiency programs. (T)

As authorized in Decisions 01-03-073 and 04-12-045, the costs in this account will be included in utility distribution revenue requirements. (N)

As authorized in Decision 04-12-045 and agreed to by the SGIP Working Group, all forfeited Application Fees will be re-allocated to the Program Administrator's incentive budget. (N)

2. APPLICABILITY:

The SGPMA shall apply to all customer classes, except for any classes that may be specifically excluded by the CPUC.

3. REVISION DATE:

Disposition of amounts in this account shall be determined in the Annual Electric True-up (AET) advice filing, or any other proceeding as authorized by the CPUC. (T)

4. RATES:

The SGPMA does not have a rate component.

5. ACCOUNTING PROCEDURE:

PG&E shall maintain the SGPMA by making entries as follows: (T)

a. A monthly debit entry for the electric portion of administrator costs including program design, contract administration, marketing, regulatory reporting, and program evaluation. (T)

b. A monthly debit entry for the electric portion of incentive payments to customers or contractors for services rendered. The total costs recorded to this entry and entry 5.a. above, plus the costs allocated to gas customers and recorded in the gas SGPMA (gas Preliminary Statement Part AW), are not to exceed the total funding authorized for this program in Decisions 01-03-073 and 04-12-045, plus any forfeited Application Fees. (N)

(L)  
|  
(L)

(Continued)



PRELIMINARY STATEMENT  
(Continued)

BY. SELF-GENERATION PROGRAM MEMORANDUM ACCOUNT (SGPMA) (Cont'd.)

5. ACCOUNTING PROCEDURE: (Cont'd.)

- |  |  |                                    |
|--|--|------------------------------------|
| <p>c. A monthly credit entry equal to one-twelfth of the electric portion of the current year SGIP costs as authorized by the CPUC in the AET (a monthly debit equal to this amount is recorded in the DRAM), or as otherwise authorized by the CPUC.</p> <p>d. An annual debit or credit entry to transfer all or a portion of the balance in the SGPMA to the DRAM, for rate recovery as approved by the CPUC in the AET, or as otherwise authorized by the CPUC.</p> <p>e. A monthly entry equal to the interest on the average of the balance at the beginning of the month and the balance after the entries 5.a. through 5.d., above, 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.</p> | <p>(N)</p> <p>-----</p> <p>(N)</p> <p>-----</p> <p>(T)</p> | <p>(L)</p> <p>-----</p> <p>(L)</p> |
|--|--|------------------------------------|



PRELIMINARY STATEMENT  
(Continued)

CZ. DISTRIBUTION REVENUE ADJUSTMENT MECHANISM (DRAM) (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

- e. A credit entry equal to the debit entry in the California Alternative Rates for Energy Account (CARE) that corresponds to the actual CARE revenue shortfall. The corresponding debit entry is defined in PG&E's electric Preliminary Statement Part M.
- f. A monthly debit entry, equal to one-twelfth of the electric portion of the current year Self Generation Incentive Program (SGIP) costs authorized by the CPUC in the AET, or as otherwise authorized by the CPUC. (T)  
|  
(T)
- g. A credit entry equal to the recorded amount of revenue cycle services credits given to customers for revenue cycle services provided by entities other than PG&E. (T)
- h. A credit entry equal to the amount of Shareholder Participation, as defined in Section 6 below. (T)
- i. A debit entry equal to the payment to fund PG&E Environmental Enhancement Corporation plus an allowance for FF&U, pursuant to the Chapter 11 Settlement Agreement Paragraph 17c adopted in Decision 03-12-035. (T)
- j. A debit or credit entry, as appropriate, to record the transfer of amounts from other accounts to the DRAM for recovery in rates, upon approval by the CPUC. (T)
- k. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor. (T)

6. SHAREHOLDER PARTICIPATION: PG&E's shareholders bear some responsibility for economic risks and rewards associated with, but not limited to, Commission-approved economic discounts and credits to certain PG&E customers. This section ensures that ratepayers will not assume shareholders' obligations.

Shareholder Participation will be calculated monthly as follows:

The amount of the Shareholder Participation Mechanism for Schedule ED, in accordance with Resolution E-3654.



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Part BH	Not Being Used	
Part BI	Not Being Used	
Part BK	Transmission Revenue Requirement Reclassification Memorandum Account .....	16761-E
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Part BM	Applicant Installation Trench Inspection Memorandum Account.....	16607-E
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Part BQ	Interim PX-Based Price Tracking Account.....	16695-E
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E-7	Residential Time-of-Use Service .....	21268,23790,23791,21595,22909,23792-E
E-A7	Experimental Residential Alternate Peak Time-of-Use Service .....	21274,23793,23794,21277,22912,23795-E
E-8	Residential Seasonal Service Option .....	23796,23797,23798,22159-E
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**PG&E Gas and Electric Advice  
Filing List  
General Order 96-A, Section III(G)**

ABAG Power Pool  
Accent Energy  
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 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  
Commerce Energy  
Constellation New Energy  
Cooperative Community Energy  
CPUC  
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  
DGS Natural Gas Services  
DMM Customer Services  
Douglass & Liddell  
Downey, Brand, Seymour & Rohwer  
Duke Energy  
Duke Energy North America  
Duncan, Virgil E.  
Dutcher, John  
Dynegy Inc.  
Ellison Schneider  
Energy Law Group LLP  
Energy Management Services, LLC  
Enron Energy Services  
Exelon Energy Ohio, Inc  
Exeter Associates  
Foster Farms  
Foster, Wheeler, Martinez  
Franciscan Mobilehome  
Future Resources Associates, Inc  
G. A. Krause & Assoc  
Gas Transmission Northwest Corporation  
GLJ Energy Publications  
Goodin, MacBride, Squeri, Schlotz &  
Hanna & Morton  
Heeg, Peggy A.  
Hitachi Global Storage Technologies  
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  
Luce, Forward, Hamilton & Scripps  
Manatt, Phelps & Phillips  
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  
Praxair, Inc.  
Price, Roy  
Product Development Dept  
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  
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  
Transcanada  
Turlock Irrigation District  
U S Borax, Inc  
United Cogen Inc.  
URM Groups  
Utility Cost Management LLC  
Utility Resource Network  
Wellhead Electric Company  
Western Hub Properties, LLC  
White & Case  
WMA