

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 3, 2008

Advice Letter 3200-E

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Subject: Revisions to LS2 – Customer Owned Street and Highway
Lighting Tariff for Testing of Energy Efficient Street Light
Technologies

Dear Mr. Cherry:

Advice Letter 3200-E is effective February 29, 2008.

Sincerely,

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

Sean H. Gallagher, Director
Energy Division



Brian K. Cherry
Vice President
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

415.973.4977
Fax: 415.973.7226

January 30, 2008

Advice 3200-E

(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

Subject: Revisions to LS2 – Customer Owned Street and Highway Lighting Tariff for Testing of Energy Efficient Street Light Technologies

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

Purpose

PG&E requests Commission approval for revisions to the LS2 tariff to support the use of energy-efficient street light technologies and address growing customer demand to test energy efficient street lights prior to a comprehensive installation of such fixtures.

Background

As more customers seek energy efficient alternatives to existing street light installations, PG&E is faced with a growing customer demand for opportunities to test new lighting technologies using existing customer owned street light facilities. While customers may presently perform such testing by making test installations in locations where metered service is available, or by retrofitting existing LS2 street light circuits with metering and changing the circuit to the LS3 Rate Schedule, customers have indicated that these options do not meet their needs. Most customers do not have LS3 metered street light circuits available, and existing metered lighting facilities are generally located in parking areas, not suitable for testing a device intended to light streets. Additionally, conversion of an existing LS2 circuit to accommodate metering is expensive and permanent, whereas customers will generally only want to utilize the installation for short term testing.

To create a consistent policy and avoid unnecessary expenditures for both the customer and the Company, PG&E proposes to accommodate such projects under the LS2 rate schedule. Under this proposal, customers will be able to test

energy efficient lighting fixtures without having to install expensive metering equipment and the Company will incorporate new technologies into the tariff only after they have been tested and accepted by customers.

Revision to Schedule

Tariff sheets from Electric Rate Schedule LS-2 are attached to indicate the proposed revision to Special Condition 13 (Billing).

This filing will not increase any rate of charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than **February 19, 2008**, which is 20 days after the date of this filing. Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jnj@cpuc.ca.gov and mas@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:

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
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

PG&E requests that this advice filing become effective on regular notice, **February 29, 2008**, which is 30 days after the date of filing.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list. Address changes to the General Order 96-B service list should be directed to Rose de la Torre at (415) 973-4716. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at:

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

A handwritten signature in black ink that reads "Brian K. Cheery". The signature is written in a cursive style and is positioned above the typed name.

Vice President, Regulatory Relations

Attachments

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 M)**

Utility type:

- ELC GAS
 PLC HEAT WATER

Contact Person: Megan Hughes

Phone #: (415) 973-1877

E-mail: mehr@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) #: 3200-E

Tier: 2

Subject of AL: Revisions to LS2 – Customer Owned Street and Highway Lighting Tariff for Testing of Energy Efficient Street Light Technologies

Keywords (choose from CPUC listing): Street Lights

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: No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: February 28, 2008

No. of tariff sheets: 3

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: Rate Schedule AG-ICE

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: Advice 3115-E-A

Protests, dispositions, 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

Tariff Files, Room 4005

DMS Branch

505 Van Ness Ave.,

San Francisco, CA 94102

jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian K. Cherry

Vice President, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

**ATTACHMENT 1
Advice 3200-E**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
27058-E	Schedule LS-2--Customer-Owned Street and Highway Lighting	26982*-E
27059-E	Table of Contents -- Rate Schedules	26515-E
27060-E	Table of Contents -- Title Page	26713-E



SCHEDULE LS-2—CUSTOMER-OWNED STREET AND HIGHWAY LIGHTING
 (Continued)

SPECIAL
 CONDITIONS:
 (Cont'd.)

13. **BILLING:** This Rate Schedule is subject to PG&E's other rules governing billing issues, as may be applicable. PG&E performs regular auditing as part of this rate schedule.

(N) (P)

Limited testing of Energy Efficient Street Light Technology will be allowed under this Rate Schedule where a light of the type and wattage of the fixture and lamp to be tested are not presently included in the rate tables. Such test installations are subject to approval by PG&E. Following approval, test installations will be billed at the customer's currently billed rate. Customer will provide a monthly inventory of streetlights that will be tested. The format and content of the inventory must be approved by PG&E. The Company reserves the right to audit customer. PG&E also reserves the right to collect the cost of any such audit from the customer. Testing is limited to existing street light fixtures and the total energy consumption per fixture must not exceed current energy use per fixture. Additional energy efficient street light fixtures installed will also be subject to billing under the current rate upon the approval of PG&E. The test period will not exceed 12 months.

(D) (P)
 (N)

Bundled Service Customers receive supply and delivery service solely from PG&E. The Customer's bill is based on the Total Rate set forth above.

Transitional Bundled Service Customers take transitional bundled service as prescribed in Rules 22.1 and 23.1, or take bundled service prior to the end of the six (6) month advance notice period required to elect bundled portfolio service as prescribed in Rules 22.1 and 23.1. These customers shall pay charges for transmission, transmission rate adjustments, reliability services, distribution, nuclear decommissioning, public purpose programs, the FTA (where applicable), the RRBMA (where applicable), the applicable Cost Responsibility Surcharge (CRS) pursuant to Schedule DA CRS or Schedule CCA CRS, and short-term commodity prices as set forth in Schedule TBCC.

Direct Access (DA) and Community Choice Aggregation (CCA) Customers purchase energy from their non-utility provider and continue receiving delivery services from PG&E. Bills are equal to the sum of charges for transmission, transmission rate adjustments, reliability services, distribution, public purpose programs, nuclear decommissioning, the FTA (where applicable), the RRBMA (where applicable), the franchise fee surcharge, and the applicable CRS. The CRS is equal to the sum of the individual charges set forth below. Exemptions to the CRS are set forth in Schedules DA CRS and CCA CRS.

	<u>DA CRS</u>	<u>CCA CRS</u>	
Energy Cost Recovery Amount Charge (per kWh)	\$0.00318 (R)	\$0.00318 (R)	
Power Charge Indifference Adjustment (per kWh)	(\$0.00024) (R)	\$0.01972 (R)	
DWR Bond Charge (per kWh)	\$0.00477 (I)	\$0.00477 (I)	
CTC Charge (per kWh)	\$0.00028 (I)	\$0.00028 (I)	
Total CRS (per kWh)	\$0.00799 (R)	\$0.02795 (R)	(P)

14. **DWR BOND CHARGE:** The Department of Water Resources (DWR) Bond Charge was imposed by California Public Utilities Commission Decision 02-10-063, as modified by Decision 02-12-082, and is property of DWR for all purposes under California law. The Bond Charge applies to all retail sales, excluding CARE and Medical Baseline sales. The DWR Bond Charge (where applicable) is included in customers' total billed amounts.

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 Commercial/Industrial**

A-1	Small General Service	26044, 26045, 25484-25485, 21339-E
A-6	Small General Time-of-Use Service	24871, 26775-26776, 26047, 25981, 25486, 26777-E
A-10	Medium General Demand-Metered Service	24876, 26048-26050, 24877, 22874, 25487, 25982, 25488, 24880-E
A-15	Direct-Current General Service	26052, 26936, 26053, 25489-E
E-19	Medium General Demand-Metered Time-of-Use Service	26778-26784, 24886, 26785, 26786-26791-E
E-20	Service to Customers with Maximum Demands of 1,000 Kilowatts or More	26792, 26467, 26793-26795, 24895, 26796, 22787, 26797-26799-E
E-31	Distribution Bypass Deferral Rate	20620, 24899, 20622-E
E-37	Medium General Demand-Metered Time-of-Use Service to Oil and Gas Extraction Customers.....	24900-24901, 26058-26059, 24903-24904, 25986, 25492-25493-E
ED	Experimental Economic Development Rate	23917, 24807-E
E-CARE	CARE Program Service for Qualified Nonprofit Group-Living and Qualified Agricultural Employee Housing Facilities	25494-E
E-CSMART	Commercial SmartRate Program	26395-26399-E
E-CSAC	Commercial Smart A/C Program.....	25965-25966-E

**Rate Schedules
 Lighting Rates**

LS-1	Pacific Gas and Electric Company-Owned Street and Highway Lighting	26800-26804, 24536-24537, 26805-26806, 25495-25496-E
LS-2	Customer-Owned Street and Highway Lighting	26807-26811, 24545, 26812, 24547, 26813, 24549, 26814, 27058-E
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**PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV**

ABAG Power Pool
Accent Energy
Aglet Consumer Alliance
Agnews Developmental Center
Ahmed, Ali
Alcantar & Kahl
Ancillary Services Coalition
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.
City of Glendale
City of Healdsburg
City of Palo Alto
City of Redding
CLECA Law Office
Commerce Energy
Constellation New Energy
CPUC
Cross Border Inc
Crossborder Inc
CSC Energy Services
Davis, Wright, Tremaine LLP
Defense Fuel Support Center
Department of the Army
Department of Water & Power City
DGS Natural Gas Services

Douglass & Liddell
Downey, Brand, Seymour & Rohwer
Duke Energy
Duke Energy North America
Duncan, Virgil E.
Dutcher, John
Dynergy Inc.
Ellison Schneider
Energy Law Group LLP
Energy Management Services, LLC
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.
IUCG/Sunshine Design LLC
J. R. Wood, Inc
JTM, Inc
Luce, Forward, Hamilton & Scripps
Manatt, Phelps & Phillips
Marcus, David
Matthew V. Brady & Associates
Maynor, Donald H.
MBMC, Inc.
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
OnGrid Solar
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
Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tecogen, Inc
TFS Energy
Transcanada
Turlock Irrigation District
U S Borax, Inc
United Cogen Inc.
URM Groups
Utility Resource Network
Wellhead Electric Company
White & Case
WMA