

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 5, 2010

**Advice Letter 3638-E**

Jane K. Yura  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10B  
P.O. Box 770000  
San Francisco, CA 94177

**Subject: Revisions to Rate Schedule NEMVNMA, Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s), to Provide an Alternative Metering Option**

Dear Ms. Yura:

Advice Letter 3638-E is effective June 8, 2009.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director  
Energy Division

March 24, 2010

**Advice 3638-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Revisions to Rate Schedule NEMVNMA, *Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s)*, to Provide an Alternative Metering Option**

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

**Purpose**

In compliance with Decision (D.) 08-10-036, this filing seeks to make changes to Electric Rate Schedules NEMVNMA, *Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s)*, to provide an alternate, potentially less expensive metering option for the generation output meter than the current tariff.

**Background**

Issued October 20, 2008, Appendix B of D.08-10-036, the Multifamily Affordable Solar Housing Decision, contained a requirement that each utility's Virtual Net Metering (VNM) tariff must comply with Public Utilities (PU) Code §2827 and at a minimum:

“The building owner / manager shall be responsible for, and shall bear all costs associated with, installing a generator output meter capable of recording solar energy system output in 15-minute increments, if required, to insure appropriate customer credits. ...”

In PG&E's original NEMVNMA tariff (See Advice 3422-E-A, effective June 8, 2009), PG&E believed that an interval meter would be necessary in most instances for the generator account because the tenant units and common area accounts had the possibility of being on, or switching to, any of various time-of-use rates having different time of use periods. For reference, the time-of-use (TOU) periods for the most common TOU rate schedules PG&E expected to encounter (E-6, E-7, and A-6 for the common area) are shown in Table 1 below:

Table 1 – Time-of-use periods for most common TOU rate schedules – illustrating the varying TOU periods for three common rate schedules that might occur in a NEMVNMA eligible facility.

Rate Schedule	Season	Time-of-Use Period		
		Peak	Part-Peak	Off-Peak
E-6 / EL-6 Residential Time-of-Use Service (open to new customers)	SUMMER (Service from May 1 through October 31):	1:00 p.m. to 7:00 p.m. Monday through Friday	10:00 a.m. to 1:00 p.m. AND 7:00 p.m. to 9:00 p.m. Monday through Friday  Plus 5:00 p.m. to 8:00 p.m. Saturday and Sunday	All other times including Holidays <sup>1</sup> .
	WINTER (Service from November 1 through April 30):	n/a	All other times including Holidays.	All other times including Holidays.
E-7 / EL-7 Residential Time-of-Use Service (closed to new customers)	Summer & Winter	12:00 noon to 6:00 p.m. Monday through Friday	n/a	OFF-PEAK: All other hours
A-6 Residential Time-of-Use Service	SUMMER (Service from May 1 through October 31):	12:00 noon to 6:00 p.m. Monday through Friday (except holidays)	8:30 a.m. to 12:00 noon Monday through Friday (except holidays) AND 6:00 p.m. to 9:30 p.m.	9:30 p.m. to 8:30 a.m. Monday through Friday All day Saturday, Sunday, and holidays
	WINTER (Service from November 1 through April 30):		8:30 a.m. to 9:30 p.m. Monday through Friday (except holidays)	9:30 p.m. to 8:30 a.m. Monday through Friday (except holidays) All day Saturday, Sunday, and holidays

(While additional residential and commercial TOU rates are a possibility, PG&E expects flat rates and the TOU rates in this table to predominate in NEMVNMA arrangements.)

Because of the differences in TOU rate schedule time structures, as shown in Table 1, using a TOU meter to capture data for two or more TOU rates pushes the limits of a TOU meter's capability. As an example of this complexity, consider a

<sup>1</sup> "Holidays" for the purposes of this rate schedule are New Year's Day, President's Day, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving Day, and Christmas Day. The dates will be those on which the holidays are legally observed.

scenario where two TOU rates are involved in a NEMVNMA facility, such as the E7 and E6. In order for PG&E to make the proper allocations, PG&E's meter would need to separate out 7 kWh periods just for summer weekdays: 12pm to 10 am, 10 am to noon, noon to 1pm, 1pm to 6pm, 6 pm to 7pm, 7pm to 9pm, and 9pm to 12pm. In such situations, interval meters excel, because they allow data to be recorded in 15 minute intervals. From this data, the allocation of the kWh to support the two or more different TOU rates can then be processed on a computer back at PG&E's office without encountering any meter limitations.

To date and based on recent PG&E experience in installing NEMVNMA arrangements, most cases involve only flat (non-TOU) rates (e.g., E1, A1, or E8) or only one TOU rate structure along with a flat rate. These situations are well within the capability of a TOU meter. The current TOU metering costs would provide a less expensive alternative to the interval meter option. For these reasons, PG&E requests authorization to make the TOU meter option available in NEMVNMA installations where an interval meter is not needed

### Tariff Revisions

To support this less costly approach, PG&E proposes to add a TOU meter option to its Electric Rate Schedule NEMVNMA. The following charges for its TOU meter options have been included:

Service	rate	Single phase Meter		3 Phase Meter	
Troubleman	\$182.70/hr	1.0 hours	\$182.70	1.0 hours	\$182.70
Rep	\$171.28/hr	1.5 hours	\$256.92	1.5 hours	\$256.92
Meter cost			\$123.65		\$226.02
(subtotal)			<b>\$563.27</b>		<b>\$665.64</b>
ITCC <sup>2</sup>	(34%)		\$191.27		\$226.32
<b>total</b>			<b>\$754.84</b>		<b>\$891.96</b>
<b>One-time charge</b>			<b>\$755</b>		<b>\$890</b>

PG&E anticipates the need to adjust these charges periodically to allow for changes in labor costs, material costs and/or the ITCC rate and plans to do so in subsequent advice letters. PG&E also anticipates that when the Smart Meter program is able to support the NEMVNMA program, then these costs will be re-evaluated.

By adopting a retroactive date as the effective date of this change to the NEMVNMA tariff, PG&E will be able to refund to customers the difference in cost between the interval meter installed and the TOU meter option in those cases where the TOU meter would have been and continues to be an option.

<sup>2</sup> Income Tax Component of Contribution is based on current Internal Revenue Code.

**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 **April 13, 2010**, 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: [ijnj@cpuc.ca.gov](mailto:ijnj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto: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:

Jane K. Yura  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10B  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-6520  
E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**Effective Date**

PG&E requests that this advice filing become effective retroactively on **June 8, 2009**.

**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 and all electronic approvals should be directed to [PGETariffs@pge.com](mailto:PGETariffs@pge.com). Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

*Jane Yura - OB*

Vice President, Regulation and Rates

Attachments

cc: Service List R.08-03-008

# 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: Olivia Brown

Phone #: 415.973.9312

E-mail: [oxb4@pge.com](mailto:oxb4@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) #: 3638-E

**Tier:** 2

Subject of AL: Revisions to Rate Schedule NEMVNMA, Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s), to Provide an Alternative Metering Option  
Keywords (choose from CPUC listing): Net Metering

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.08-10-036

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 AL: N/A

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: N/A

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

Resolution Required?  Yes  No

Requested effective date: June 8, 2009

No. of tariff sheets: 4

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). N/A

Tariff schedules affected: Electric Schedule NEMVNMA

Service affected and changes proposed: N/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**

**[jn@cpuc.ca.gov](mailto:jn@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)**

**Pacific Gas and Electric Company**

**Attn: Jane K. Yura, Vice President, Regulation and Rates**

**77 Beale Street, Mail Code B10B**

**P.O. Box 770000**

**San Francisco, CA 94177**

**E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)**

**ATTACHMENT 1  
Advice 3638-E**

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

**Title of Sheet**

**Cancelling Cal  
P.U.C. Sheet No.**

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29161-E	ELECTRIC SCHEDULE NEMVNMA VIRTUAL NET ENERGY METERING FOR MULTIFAMILY AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S) Sheet 4	28285-E*
29162-E	ELECTRIC SCHEDULE NEMVNMA VIRTUAL NET ENERGY METERING FOR MULTIFAMILY AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S) Sheet 5	28286-E*
29163-E	ELECTRIC TABLE OF CONTENTS Sheet 1	29057-E
29164-E	ELECTRIC TABLE OF CONTENTS RATE SCHEDULES Sheet 4	29053-E







**ELECTRIC TABLE OF CONTENTS**

Sheet 1

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Sheet 4

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**PG&E Gas and Electric  
Advice Filing List  
General Order 96-B, Section IV**

Alcantar & Kahl	Day Carter Murphy	North Coast SolarResources
Ameresco	Defense Energy Support Center	Northern California Power Association
Anderson & Poole	Department of Water Resources	Occidental Energy Marketing, Inc.
Arizona Public Service Company	Department of the Army	OnGrid Solar
BART	Dept of General Services	Praxair
BP Energy Company	Division of Business Advisory Services	R. W. Beck & Associates
Barkovich & Yap, Inc.	Douglass & Liddell	RCS, Inc.
Bartle Wells Associates	Downey & Brand	Recon Research
Bloomberg New Energy Finance	Duke Energy	SCD Energy Solutions
Boston Properties	Dutcher, John	SCE
C & H Sugar Co.	Economic Sciences Corporation	SMUD
CA Bldg Industry Association	Ellison Schneider & Harris LLP	SPURR
CAISO	Foster Farms	Santa Fe Jets
CLECA Law Office	G. A. Krause & Assoc.	Seattle City Light
CSC Energy Services	GLJ Publications	Sempra Utilities
	Goodin, MacBride, Squeri, Schlotz & Ritchie	Sierra Pacific Power Company
California Cotton Ginners & Growers Assn	Green Power Institute	Silicon Valley Power
California Energy Commission	Hanna & Morton	Silo Energy LLC
California League of Food Processors	Hitachi	Southern California Edison Company
California Public Utilities Commission	International Power Technology	Sunshine Design
Calpine	Intestate Gas Services, Inc.	Sutherland, Asbill & Brennan
Cameron McKenna	Los Angeles Dept of Water & Power	Tabors Caramanis & Associates
Cardinal Cogen	Luce, Forward, Hamilton & Scripps LLP	Tecogen, Inc.
Casner, Steve	MBMC, Inc.	Tiger Natural Gas, Inc.
Chamberlain, Eric	MRW & Associates	Tioga Energy
Chris, King	Manatt Phelps Phillips	TransCanada
City of Glendale	McKenzie & Associates	Turlock Irrigation District
City of Palo Alto	Merced Irrigation District	U S Borax, Inc.
Clean Energy Fuels	Mirant	United Cogen
Coast Economic Consulting	Modesto Irrigation District	Utility Cost Management
Commerce Energy	Morgan Stanley	Utility Specialists
Commercial Energy	Morrison & Foerster	Verizon
Consumer Federation of California	NRG West	Wellhead Electric Company
Crossborder Energy	New United Motor Mfg., Inc.	Western Manufactured Housing Communities Association (WMA)
		eMeter Corporation
Davis Wright Tremaine LLP	Norris & Wong Associates	