

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 3, 2011

**Advice Letter 3177-G/3779-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: Revision to Gas and Electric Energy Efficiency Balancing  
Accounts to Record On-Bill Financing Default Expense**

Dear Ms. Yura:

Advice Letter 3177-G/3779-E is effective January 14, 2011.

Sincerely,

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

Julie A. Fitch, Director  
Energy Division



**Jane Yura**  
Vice President  
Regulation and Rates

*Mailing Address*  
Mail Code B10B  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415.973.6520

December 15, 2010

**Advice 3177-G/3779-E**

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Revision to Gas and Electric Energy Efficiency Balancing  
Accounts to Record On-Bill Financing Default Expense**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby submits this advice letter to revise Gas Preliminary Statement Part Y, *Gas Public Purpose Energy Efficiency Balancing Account (PPPEEBA)*; Electric Preliminary Statement Part P, *Electric Public Purpose Energy Efficiency Balancing Account (PPPEEBA)*; and Electric Preliminary Statement Part DI, *Procurement Energy Efficiency Balancing Account (PEEBA)* (together referred to as the expense balancing accounts) to correctly record any default on loans made under the On-Bill Financing Program adopted in Decision (D.) 09-09-047 and Advice 3118-G-A/3667-E-A approved on June 30, 2010.

**Background**

D.09-09-047 adopted the OBF Program, including the provision that the value of the loan pool would be removed from energy efficiency (EE) portfolio cost effectiveness calculations and that the loan defaults would be considered a program expense.

PG&E filed tariffs to implement the OBF Program in Advice 3118-G-A/3667-E-A, approved on June 30, 2010, that included a provision to transfer the authorized OBF loan pool amount from the expense balancing accounts to the Gas and Electric On-Bill Financing Balancing Accounts (OBFBA). This provision allows PG&E to track the OBF loan activity separate from EE program expenses.

In the case of a loan default, the approved OBFBA and expense balancing accounts have offsetting entries to record a reduction to the available loan pool amount in the OBFBA equal to the amount of the default and record the loan default expense in the expense balancing accounts. However, an additional entry is needed to transfer funds back to the expense balancing accounts in an amount equal to the default expense. Without the proposed additional entries, the

approved tariffs inadvertently reduce the amount of EE program funding by the loan default amount rather than reducing the amount of the available OBF loan pool.

### **Requested Tariff Revisions**

PG&E requests a revision to the Gas and Electric PPPEEBAs and PEEBA to record a credit entry in each of the expense balancing accounts equal to the loan default amount recorded in the accounts. These entries will in effect reverse the one-time loan pool transfers previously recorded in the expense balancing accounts by the amount of the loan default. Therefore, the available OBF loan pool will be reduced by the OBF loan default and the available EE program budget will not be impacted. The OBFAs are unchanged.

Specifically, PG&E requests approval to add the following new entry 6e to the PPPEEBA-gas, PPPEEBA- electric, and PEEBA:

- A credit entry to partially reverse the OBF loan pool transfer made in entry 6c, above, equal to the write off for any OBF loan default recorded in entry 6d, above.

### **Effective Date**

PG&E requests that this advice filing become effective on regular notice, **January 14, 2011**, which is 30 calendar days after the date of filing.

### **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 **January 5, 2011**, which is 21 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: [jjn@cpuc.ca.gov](mailto:jjn@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:

**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 and the service list for A.08-07-021. Address changes to the General Order 96-B service list should be directed to email [PGETariffs@pge.com](mailto:PGETariffs@pge.com). For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov). Send all electronic approvals to [PGETariffs@pge.com](mailto: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 "Jane Yura-OB". The signature is written in a cursive style.

Vice President – Regulation and Rates

cc: Service List for A.08-07-021

# 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) #: 3177-G/3779-E

**Tier:** 2

Subject of AL: Revision to Gas and Electric Energy Efficiency Balancing Accounts to Record On-Bill Financing Default Expense

Keywords (choose from CPUC listing): Compliance

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 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: January 14, 2011

No. of tariff sheets: 11

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: Gas Preliminary Statement Part Y and Electric Preliminary Statement Parts P and DI

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 GasOBF**

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
28663-G	GAS PRELIMINARY STATEMENT PART Y CUSTOMER ENERGY EFFICIENCY ADJUSTMENT Sheet 3	28303-G
28664-G	GAS PRELIMINARY STATEMENT PART Y CUSTOMER ENERGY EFFICIENCY ADJUSTMENT Sheet 4	
28665-G	GAS TABLE OF CONTENTS Sheet 1	28637-G
28666-G	GAS TABLE OF CONTENTS Sheet 4	28640-G



**GAS PRELIMINARY STATEMENT PART Y**  
**CUSTOMER ENERGY EFFICIENCY ADJUSTMENT**

Sheet 3

Y. CUSTOMER ENERGY EFFICIENCY ADJUSTMENT (CEEA) (Cont'd.)

- 6. Gas Public Purpose Program Energy Efficiency Balancing Account (PPPEEBA): The following entries will be made to this subaccount each month or as applicable:
  - a. A debit entry equal to the expenses incurred for gas portion of authorized EE program related activities;
  - b. A credit entry equal to one-twelfth of the gas PPP surcharge portion of authorized EE funding for the current program year. (see corresponding debit entry in gas Preliminary Statement Part BA - Public Purpose Program Surcharge-Energy Efficiency); (T)
  - c. A one-time debit entry equal to the gas portion of the initially authorized revolving loan amount and any subsequent amount authorized by the Commission (see corresponding credit entry in Gas Preliminary Statement Part BY-On-Bill Financing Balancing Account (OBFBA-Gas); the gas portion of other OBF expenses are recorded in entry 6.a, above.); (T)
  - d. A debit entry equal to the gas portion of a write-off for any OBF loan defaults (See offsetting tracking entries in OBFBA-Gas); (T)
  - e. A credit entry to partially reverse the OBF loan pool transfer made in entry 6c, above, equal to the write off for any OBF loan default recorded in entry 6d, above; (N)  
(N)
  - f. A debit or credit entry equal to any amounts authorized by the CPUC to be recorded in this subaccount; (T)
  - g. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts, as approved by the Commission; and (T)
  - h. An entry equal to the interest on the average balance at the beginning of the month and the balance after the above entries are made, 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)

(Continued)



**GAS PRELIMINARY STATEMENT PART Y**  
**CUSTOMER ENERGY EFFICIENCY ADJUSTMENT**

Sheet 4

Y. CUSTOMER ENERGY EFFICIENCY ADJUSTMENT (CEEA) (Cont'd.)

- 7. Gas Public Purpose Program Gas Low-Income Balancing Account (PPPLIBA): The following entries will be made to this subaccount each month or as applicable: (L)

  - a. A debit entry equal to the gas portion of expenses incurred for authorized LIEE program-related activities; |
  - b. A credit entry equal to one-twelfth of the gas PPP surcharge portion of authorized LIEE funding for the current program year. (See corresponding debit entry in gas Preliminary Statement Part BH - Public Purpose Program Surcharge-Low Income Energy Efficiency); |
  - c. A debit or credit entry equal to any amounts authorized by the CPUC to be recorded in this subaccount; |
  - d. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts, as approved by the Commission; |
  - e. An entry equal to the interest on the average balance at the beginning of the month and the balance after the above entries are made, 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. |

(L)



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Part X	Liquefied Natural Gas Balancing Account .....	27454-G
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**ATTACHMENT 1  
Advice OBF**

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

**Title of Sheet**

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

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29729-E	ELECTRIC PRELIMINARY STATEMENT PART P CUSTOMER ENERGY EFFICIENCY ADJUSTMENT Sheet 3	29486-E
29730-E	ELECTRIC PRELIMINARY STATEMENT PART P CUSTOMER ENERGY EFFICIENCY ADJUSTMENT Sheet 4	
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29732-E	ELECTRIC PRELIMINARY STATEMENT PART DI PROCUREMENT ENERGY EFFICIENCY BALANCING ACCOUNT Sheet 2	
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29735-E	ELECTRIC TABLE OF CONTENTS PRELIMINARY STATEMENT Sheet 8	29497-E



**ELECTRIC PRELIMINARY STATEMENT PART P**  
**CUSTOMER ENERGY EFFICIENCY ADJUSTMENT**

Sheet 3

P. CUSTOMER ENERGY EFFICIENCY ADJUSTMENT (CEEA) (Cont'd.)

- 6. Electric Public Purpose Program Energy Efficiency Balancing Account (PPPEEBA): The following entries will be made to this subaccount each month or as applicable:
  - a. A debit entry equal to the expenses incurred for the electric portion of authorized EE program related activities;
  - b. A credit entry equal to one-twelfth of the Electric PGC portion of authorized EE funding for the current program year (see corresponding debit entry in electric Preliminary Statement Part DA - Public Purpose Programs Revenue Adjustment Mechanism); (T)
  - c. A one-time debit entry equal to the PGC portion of the initial authorized revolving loan amount, and any subsequent amount authorized by the Commission (see corresponding credit entry in Electric Preliminary Statement Part FE-On-Bill Financing Balancing Account (OBFBA-Electric); the PGC portion of other OBF expenses are recorded in entry 6.a, above.); (T)
  - d. A debit entry equal to the PGC portion of a write-off for any OBF loan defaults (see offsetting tracking entries in OBFBA-Electric); (T)
  - e. A credit entry to partially reverse the OBF loan pool transfer made in entry 6c, above, equal to the write off for any OBF loan default recorded in entry 6d, above; (N)  
(N)
  - f. A debit or credit entry equal to any amounts authorized by the Commission to be recorded in this subaccount; (T)
  - g. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission; and (T)
  - h. An entry equal to the interest on the average balance at the beginning of the month and the balance after the above entries are made, at a rate equal to one-twelfth the interest rate on Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release H.15, or its successor. (T)

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**ELECTRIC PRELIMINARY STATEMENT PART P**  
**CUSTOMER ENERGY EFFICIENCY ADJUSTMENT**

Sheet 4

P. CUSTOMER ENERGY EFFICIENCY ADJUSTMENT (CEEA) (Cont'd.)

- 7. Electric Public Purpose Program Low-Income Balancing Account (PPPLIBA): The following entries will be made to this subaccount each month or as applicable: (L)

  - a. A debit entry equal to the electric portion of expenses incurred for authorized LIEE program-related activities; |
  - b. A credit entry equal to one-twelfth of the Electric PGC portion of authorized LIEE programs for the current program year (See corresponding debit entry in electric Preliminary Statement Part DA - Public Purpose Programs Revenue Adjustment Mechanism); |
  - c. A debit or credit entry equal to any amounts authorized by the Commission to be recorded in this subaccount; |
  - d. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission; and |
  - e. An entry equal to the interest on the average balance at the beginning of the month and the balance after the above entries are made, at a rate equal to one-twelfth the interest rate on Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release H.15, or its successor. | (L)



**ELECTRIC PRELIMINARY STATEMENT PART DI**  
**PROCUREMENT ENERGY EFFICIENCY BALANCING ACCOUNT**

Sheet 1

DI. PROCUREMENT ENERGY EFFICIENCY BALANCING ACCOUNT (PEEBA)

1. PURPOSE:

Decision 03-12-062 established the one-way Procurement Energy Efficiency Balancing Account (PEEBA) to track PG&E's procurement energy efficiency (EE) costs and revenues associated with authorized programs. The PEEBA tracks the procurement portion of PG&E's EE program expenditures against the procurement portion of authorized EE program funding.

2. APPLICABILITY:

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

3. REVISION DATE:

The disposition of the balance in this account shall be through the Annual Electric True-up advice letter process or as otherwise authorized by the Commission.

4. RATES:

The PEEBA does not have a separate rate element.

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**ELECTRIC PRELIMINARY STATEMENT PART DI**  
**PROCUREMENT ENERGY EFFICIENCY BALANCING ACCOUNT**

Sheet 2

DI. PROCUREMENT ENERGY EFFICIENCY BALANCING ACCOUNT (PEEBA)

5. ACCOUNTING PROCEDURE:

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

- a. A debit entry equal to the procurement portion of authorized EE program expenses. | (L)
- b. A credit entry equal to one-twelfth of the procurement portion of authorized EE funding for the current program year (see corresponding debit entry in electric Preliminary Statement Part EF - Procurement Energy Efficiency Revenue Adjustment Mechanism (PEERAM)). |
- c. One-time debit entry equal to the procurement portion of the initial authorized revolving loan amount, and any subsequent amount authorized by the Commission (see corresponding credit entry in electric Preliminary Statement Part FE – On-Bill Financing Balancing Account (OBFBA-Electric); the procurement portion of other OBF expenses are recorded in entry 5.a, above.) | (T)
- d. A debit entry equal to the procurement portion of write-off for any OBF loan defaults (see offsetting tracking entries in OBFBA - Electric). |
- e. A credit entry to partially reverse the OBF loan pool transfer made in entry 6c, above, equal to the write off for any OBF loan default recorded in entry 6d, above. | (N)
- f. A debit or credit entry equal to any amount authorized by the CPUC to be recorded in this subaccount. | (T)
- g. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the CPUC. | (T)
- h. An entry equal to interest on the average balance at the beginning of the month and the balance after the above entries are made, 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. | (L)



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**PRELIMINARY STATEMENT**

Sheet 8

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

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