

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 14, 2011

Advice Letter 3892-E

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

Subject: Revisions to Demand Adjustment, Schedule E-20

Dear Mr. Cherry:

Advice Letter 3892-E is approved and effective September 15, 2011.

Energy Division staff has reviewed the arguments provided in the protest by Tecogen, Inc. on September 6, 2011 and the reply comments filed by Pacific Gas & Electric on September 13, 2011. However, Energy Division staff rejects the protest at this time. The protest is denied on the basis that the Legislature and the California Energy Commission have indicated their support for programs that assist in the proliferation of fuel cells.

Sincerely,

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

Julie A. Fitch, Director
Energy Division

August 16, 2011

Advice 3892-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Revisions to Demand Adjustment, Schedule E-20

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

Purpose

Pacific Gas and Electric Company (PG&E) submits this filing to include a Fuel Cell Generation Demand Adjustment within Schedule E-20.

Background

On July 17, 2007, PG&E filed Advice Letter (AL) 3086-E¹ to introduce a Solar Generation Demand Adjustment to Schedule E-20.

Similar to the Solar Generation Demand Adjustment, this modification is intended to remove a potential disincentive to the adoption of fuel cells among PG&E's large commercial/industrial customers who are being served on rate Schedule E-20.

Specifically, a reduction in maximum demand due to fuel cell generation could result in customers being transferred off of Schedule E-20, which has mandatory requirements for a customer to exceed 999 kW, to another schedule such as Schedule E-19, a rate which may have a higher demand and energy charge.

PG&E proposes to include the capacity of a customer's PG&E approved and interconnected fuel cell system with their actual maximum demands for the sole purpose of determining on-going rate applicability. Customers will continue to be billed upon their actual demand and energy usage.

¹ http://www.pge.com/nots/rates/tariffs/tm2/pdf/ELEC_3086-E.pdf

Tariff Revisions

PG&E proposes to add language to include Fuel Cells in the existing E-20 tariff's Applicability section where it describes the Solar Generation Demand Adjustment on Sheet 2.

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 **September 6, 2011** which is 21² 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: anj@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, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

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

Effective Date

PG&E requests that this Tier 2 advice filing become effective on regular notice, **September 15, 2011**, which is 30 calendar days after the date of filing.

²The regular 20 day protest periods ends on a holiday so the protest period is extended to the next business day.

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 parties on the service list for R.10-05-004 (*Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues*). Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at ProcessOffice@cpuc.ca.gov. 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 cursive script that reads "Brian Cherry" followed by a date "8/16/11".

Vice President, Regulation and Rates

Attachments

cc: Service Lists GO 96-B and R.10-05-004

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: David Poster or Greg Backens

Phone #: (415) 973-1082 or (415) 973-4390

E-mail: DxPU@pge.com or GAB4@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) #: **3892-E**

Tier: **2**

Subject of AL: **Revisions to Demand Adjustment, Schedule E-20**

Keywords (choose from CPUC listing): Self Generation, Demand Charge

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: Does AL replace a withdrawn or rejected AL? No. If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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

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: **September 15, 2011**

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: Electric Schedule E-20

Service affected and changes proposed: Revise demand adjustment.

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 Cherry, Vice President, Regulation and Rates

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

**ATTACHMENT 1
Advice 3892-E**

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

Title of Sheet

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

30531-E	ELECTRIC SCHEDULE E-20 SERVICE TO CUSTOMERS WITH MAXIMUM DEMANDS of 1000 KILOWATTS or MORE Sheet 2	26467-E
30532-E	ELECTRIC TABLE OF CONTENTS Sheet 1	30475-E
30533-E	ELECTRIC TABLE OF CONTENTS RATE SCHEDULES Sheet 4	30270-E



ELECTRIC SCHEDULE E-20
SERVICE TO CUSTOMERS WITH MAXIMUM
DEMANDS of 1000 KILOWATTS or MORE

Sheet 2

1. APPLICABILITY:
 (Cont'd.)

Definition of Maximum Demand: Demand will be averaged over 15-minute intervals. "Maximum demand" will be the highest of all the 15-minute averages for the billing month. If the customer's use of electricity is intermittent or subject to severe fluctuations, a 5-minute interval may be used. If the customer has any welding machines, the diversified resistance welder load, calculated in accordance with Section J of Rule 2, will be considered the maximum demand if it exceeds the maximum demand that results from averaging the demand over 15-minute intervals. The customer's maximum-peak-period demand will be the highest of all the 15-minute averages for the peak period during the billing month. (See Section 6 for a definition of "Peak-Period.")

Standby Demand: For customers for whom Schedule S—Standby Service Special Conditions 1 through 6 apply, standby demand is the portion of a customer's maximum demand in any month caused by nonoperation of the customer's alternate source of power, and for which a demand charge is paid under the regular service schedule.

If the customer imposes standby demand in any month, then the regular service maximum demand charge will be reduced by the applicable reservation capacity charge (see Schedule S Special Condition 1).

To qualify for the above reduction in the maximum demand charge, the customer must, within 30 days of the regular meter read date, demonstrate to the satisfaction of PG&E the amount of standby demand in any month. This may be done by submitting to PG&E a completed Electric Standby Service Long Sheet (Form 79-726).

Solar or Fuel Cell Generation Demand Adjustment: A customer who installs a solar electric generation facility on or after January 1, 2007, or fuel cell electric generation facility may be eligible to receive a Generation Demand Adjustment. A customer will qualify for a Generation Demand Adjustment if both of the following conditions are met: (1) either the customer's solar electric generating facility was installed after January 1, 2007, or the customer's fuel cell electric generation facility was installed (and approved for interconnection by PG&E); and (2) the electric generation facility reduces the customer's maximum demand to the point that the customer would no longer be eligible for service under this schedule. The Generation Demand Adjustment will be the fixed reduction in demand as determined by PG&E from the customer's interconnection agreement, and will be added to the customer's maximum demand for the sole purpose of determining the customer's eligibility for Schedule E-20.

The Generation Demand Adjustment does not specifically guarantee the customer's continued eligibility for service under this schedule nor will it be applied to the customer's maximum demand for purposes of calculating the monthly maximum demand charge.

The Generation Demand Adjustment for solar generating facilities will terminate on December 31, 2016.

2. TERRITORY:

Schedule E-20 applies everywhere PG&E provides electric service.

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Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
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	Preliminary Statements	30068,29900,30376,30262,30174,30405,30383-E	
	Rules	30402, 30473, 30476-E	
	Maps, Contracts and Deviations.....	29909-E	
	Sample Forms	29910,30353,30372,29913,30354,29915,29916,29917,30271,29919,29920,29921-E	

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ELECTRIC TABLE OF CONTENTS
RATE SCHEDULES

Sheet 4

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Rate Schedules Commercial/Industrial		
A-1	Small General Service.....	30506, 29974, 29975, 29976,30080, 30081, 30082-30086-E
A-6	Small General Time-of-Use Service.....	30507,27610,29977,29978,25981, 29760,26931, 29072-29074-E
A-10	Medium General Demand-Metered Service.....	29075, 30508, 29979, 29980, 29981, 29982, 29081, 29082,29083, 29765, 29085,29086-89-E
A-15	Direct-Current General Service	29983,29984,29768-E
E-19	Medium General Demand-Metered Time-of-Use Service	29090, 30510,29092, 30010, 30011, 26945,29094,24886,26947-26950,29805,28825,28826, 30092,29096- 29097-E
E-20	Service to Customers with Maximum Demands of 1,000 Kilowatts or More..... 29098,30531,30012,30013,29100,24895,26958,22787,29808,28830,30093,29102-29103-E (T)
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	29104,24901,30014,30015,27613, 24904,25986,28833,29811-E
E-CARE	CARE Program Service for Qualified Nonprofit Group-Living and Qualified Agricultural Employee Housing Facilities30425-E
E-CSAC	Commercial Smart A/C Program29962,30094,27302-E
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E-SRG	Small Renewable Generator PPA30265, 30266, 28701-E
ED	Experimental Economic Development Rate 29544-29546-E

(Continued)

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

AT&T	Dept of General Services	Northern California Power Association
Alcantar & Kahl LLP	Douglass & Liddell	Occidental Energy Marketing, Inc.
Ameresco	Downey & Brand	OnGrid Solar
Anderson & Poole	Duke Energy	Praxair
Arizona Public Service Company	Economic Sciences Corporation	R. W. Beck & Associates
BART	Ellison Schneider & Harris LLP	RCS, Inc.
Barkovich & Yap, Inc.	Foster Farms	Recurrent Energy
Bartle Wells Associates	G. A. Krause & Assoc.	SCD Energy Solutions
Bloomberg	GLJ Publications	SCE
Bloomberg New Energy Finance	GenOn Energy, Inc.	SMUD
Boston Properties	Goodin, MacBride, Squeri, Schlotz & Ritchie	SPURR
Braun Blasing McLaughlin, P.C.	Green Power Institute	San Francisco Public Utilities Commission
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	Sun Light & Power
Calpine	MAC Lighting Consulting	Sunshine Design
Cardinal Cogen	MBMC, Inc.	Sutherland, Asbill & Brennan
Casner, Steve	MRW & Associates	Tabors Caramanis & Associates
Chris, King	Manatt Phelps Phillips	Tecogen, Inc.
City of Palo Alto	McKenzie & Associates	Tiger Natural Gas, Inc.
City of Palo Alto Utilities	Merced Irrigation District	TransCanada
City of San Jose	Modesto Irrigation District	Turlock Irrigation District
Clean Energy Fuels	Morgan Stanley	United Cogen
Coast Economic Consulting	Morrison & Foerster	Utility Cost Management
Commercial Energy	NLine Energy, Inc.	Utility Specialists
Consumer Federation of California	NRG West	Verizon
Crossborder Energy	NaturEner	Wellhead Electric Company
Davis Wright Tremaine LLP	Navigant Consulting	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	Norris & Wong Associates	eMeter Corporation
Defense Energy Support Center	North America Power Partners	
Department of Water Resources	North Coast SolarResources	