

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 28, 2012

Advice Letters 4055-E-A

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: Establish the Virtual Net Energy Metering Site Assessment Fee
Memorandum Account**

Dear Mr. Cherry:

Advice Letter 4055-E-A is effective as of July 26, 2012.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, 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

Fax: 415.973.6520

June 26, 2012

Advice 4055-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Establish the Virtual Net Energy Metering Site Assessment Fee Memorandum Account

Purpose

In compliance with Ordering Paragraph (OP) 2 of Resolution E-4481, PG&E proposes to establish the Electric Preliminary Statement, Part FZ - Virtual Net Energy Metering Site Assessment Fee Memorandum Account. The affected tariff sheet is listed on the enclosed Attachment 1.

On June 6, PG&E filed Advice 4055-E to establish the Virtual Net Energy Metering Site Assessment Fee Memorandum Account. PG&E makes this supplemental advice filing in response to a suggestion from the Division of Ratepayer Advocates for additional clarifying language regarding site assessments. This supplemental Advice provides additional explanatory language on the purpose and necessity of inspecting and assessing customer's interconnecting with PG&E's electric equipment.

This advice letter replaces Advice 4055-E in its entirety to add clarifying language regarding site assessments.

Background

On April 19, 2012, the Commission issued Resolution E-4481, *Tariffs Compliant with CPUC Decision 11-07-031, O.P. 2, Relating to Expansion of Virtual Net Energy Metering (VNM) to Apply to All Multi-tenant and Multi-meter Properties*. Decision (D.) 11-07-031, OP 2 ordered PG&E, SCE, and SDG&E - known collectively, as the investor-owned utilities (IOUs) to each file Tier 2 advice letters (AL) containing modifications to the Net Energy Metering (NEM) tariffs to allow VNM to apply to all multi-tenant and multi-meter properties, with the limitation that sharing of bill credits can only occur for accounts served by a single service delivery point. In compliance with D-

11-07-031,¹ OP 2, PG&E filed AL 3902-E on September 12, 2011². In AL 3902-E, PG&E proposed a \$550 Service Delivery Point and NEMV Arrangement Assessment Charge. PG&E and the other IOU's proposed site assessment fees were protested by the Joint Solar Parties and DRA. In Resolution E-4481, OP 2, the Commission stated:

"We reject the proposed site assessment fees. Utilities shall modify their application forms to collect the necessary technical details from VNM interconnection applications. If after review of the application the IOUs determine a site assessment is essential, the utilities may conduct a site assessment and track the expenses associated with such on-site VNM site assessments for the "complex service configurations" and one year from the effective date of this resolution may request recovery of those expenses and/or address the need for and criteria that would trigger a VNM site assessment going forward."

Request for Approval

PG&E requests approval to establish the Virtual Net Energy Metering Site Assessment Fee Memorandum Account to record incremental costs resulting from performing site assessments for customers requesting VNEM service.

PG&E believes a site assessment will be required for most VNM interconnections. Similar to PG&E's experience during the past two years with interconnecting NEMVMASH customers, site visits by experienced PG&E personnel are generally necessary to assess the complex service configurations associated with establishing VNM service. PG&E considers a service configuration to be complex when altering any components on the line side of an existing main disconnect switch, as discussed below.

The purpose of a site assessment is to verify the location and feasibility of a proposed interconnection point. Unlike standard net energy metering where the point of interconnection is typically on the load side of the customer's meter, VNM interconnections must be made on the line side of the customer's meters. PG&E's Electric and Gas Service Requirements (Greenbook) allow two standard points of interconnection for VNM: (i) within a newly installed Termination Enclosure (box), located ahead of the existing electric panels. Upon connecting the wires and establishing interconnection, this Termination Enclosure is sealed by PG&E; or (ii) inside the main electric switch section (still ahead of all tenant/house meters).

Under the NEMVMASH program, applicants have typically requested interconnection within PG&E's sealed electric panel sections. PG&E's Greenbook, Section 5.5.2, prohibits unauthorized entry of these sections.

¹ http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/139683.pdf

² PG&E also made two revisions to NEMV in AL 3902-A filed October 11, 2011 and 3902-B on December 20, 2011, but these did not modify the site assessment language contained in AL 3902-E.

During a site assessment, trained and experienced PG&E personnel typically:

- Review panel area space/clearances to verify the proposed interconnection point is feasible as proposed in the application and can be implemented safely and without affecting PG&E sealed electric service panels.
- Ensure the proposed meter, metering equipment, and AC disconnect locations meet PG&E's Greenbook.
- Assess the condition of existing PG&E service equipment for early planning of any upgrades necessary to handle the addition of potentially significant generation.
- Access PG&E sealed electric panel sections, if necessary.

Finally, the site assessment also provides the ability for early planning of the disconnecting and reconnecting of the electric service in a safe manner when the interconnection is located ahead of the main breaker. Lead times for scheduling disconnection/reconnection vary, depending on the resources needed to de-energize equipment (e.g. transformers) and, at times, the time needed to communicate with other affected customers.

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 **July 2, 2012**, which is 6 days after the date of this supplemental 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: EDTariffUnit@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) 973-6520
E-mail: PGETariffs@pge.com

Effective Date

PG&E requests that this Tier 2 advice filing become effective on regular notice, **July 26, 2012**, which is 30 calendar 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 and the parties on the service list for R.10-05-004. 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 Process_Office@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 black ink that reads "Brian Cherry". The signature is written in a cursive style and includes a large, stylized flourish at the end.

Vice President, Regulatory Relations

Attachments

cc: Service List 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 E)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Kimberly Chang

Phone #: (415) 972-5472

E-mail: kwcc@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) #: **4055-E-A**

Tier: **2**

Subject of AL: **Establish the Virtual Net Energy Metering Site Assessment Fee Memorandum Account**

Keywords (choose from CPUC listing): Compliance, Memorandum Account

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-4481

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: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for:

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: **July 26, 2012**

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: New Electric Preliminary Statement Part FZ - VIRTUAL NET ENERGY METERING SITE ASSESSMENT MEMORANDUM ACCOUNT (VNEMMA)

Service affected and changes proposed:

Pending advice letters that revise the same tariff sheets: 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
E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Brian Cherry
Vice President, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

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

Title of Sheet

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

31687-E ELECTRIC PRELIMINARY STATEMENT PART FZ
VIRTUAL NET ENERGY METERING
SITE ASSESSMENT MEMORANDUM ACCOUNT
Sheet 1

31688-E ELECTRIC TABLE OF CONTENTS
Sheet 1

31677-E

31689-E ELECTRIC TABLE OF CONTENTS
PRELIMINARY STATEMENT
Sheet 17

31674-E



ELECTRIC PRELIMINARY STATEMENT PART FZ
 VIRTUAL NET ENERGY METERING
 SITE ASSESSMENT MEMORANDUM ACCOUNT

Sheet 1

- FZ. VIRTUAL NET ENERGY METERING SITE ASSESSMENT MEMORANDUM ACCOUNT (VNEMMA) (N)
1. PURPOSE: The purpose of this account, as directed in Resolution E-4481, Ordering Paragraph 2, is to track actual electric expenses incurred by PG&E for on-site Virtual Net Energy Metering (NEMV) site assessments, when deemed essential through April 19, 2013 or as otherwise directed by the Commission. (N)
 2. APPLICABILITY: The VNEMMA shall apply to all customer classes, except for those specifically excluded by the California Public Utilities Commission (CPUC).
 3. REVISION DATE: Disposition of the electric balance in this account shall be determined in a future rate case or as authorized by the Commission.
 4. RATES: The VNEMMA does not have a rate component.
 5. VNEMMA ACCOUNTING PROCEDURE: PG&E shall maintain the account by making entries at the end of each month as follows:
 - a. A debit entry to record the incremental electric expenses incurred by the PG&E for on-site NEMV site assessments as directed by the Commission.
 - b. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as authorized by the CPUC.
 - c. A debit or credit entry, as appropriate, 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.b. 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 (N)



ELECTRIC TABLE OF CONTENTS

Sheet 1

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	Maps, Contracts and Deviations	29909-E	
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PRELIMINARY STATEMENT

Sheet 17

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(Continued)

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

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