

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 27, 2012

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

**Subject: PG&E Proposal for Providing Billing Data to Owners of Projects Taking Service on Schedule NEMV, in Compliance with Ordering Paragraph 8 of Resolution E-4481.**

Dear Mr. Cherry:

PG&E submitted Advice Letter 4130-E on October 25, 2012. The Advice Letter contained a background section. PG&E proposed the following language in its conclusion:

Proposed Option – “No Cost” Generator Account Report – This report provides the Owner a “no cost” monthly non-confidential report that would be included on the Owner’s detail of bill. Below is an illustrative sample of what will be provided in the report:

### Generator Account

<b>Measured kWh</b>
1,000

### Benefitting Account

<b>Service Address</b>	<b>Allocation Percentage</b>	<b>Allocated kWh</b>
123 ABC ST	50%	500
123 ABC ST, APT 101	10%	100
123 ABC ST, APT 102	10%	100
123 ABC ST, APT 103	10%	100
123 ABC ST, APT 104	10%	100
123 ABC ST, APT 105	10%	100

PG&E's proposed option in Advice Letter 4130-E is approved and effective November 26, 2012.

Sincerely,

A handwritten signature in black ink that reads "Edward F. Randolph". The signature is written in a cursive style with a prominent "E" and "R".

Edward F. Randolph, Director  
Energy Division

October 25, 2012

**Advice 4130-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: PG&E Proposal for Providing Billing Data to Owners of Projects Taking Service on Schedule NEMV, in Compliance with Ordering Paragraph 8 of Resolution E-4481<sup>1</sup>**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby submits a proposal for providing billing data to the owner of a project taking service on Electric Schedule NEMV – *VIRTUAL NET METERING FOR A MULTI-TENANT OR MULTI-METER PROPERTY SERVED AT THE SAME SERVICE DELIVERY POINT*, in compliance with Ordering Paragraph (OP) 8 of Resolution E-4481.

**Background**

On June 4, 2012, PG&E's Advice Letter (AL) 3902-E-C<sup>2</sup> was approved satisfying the requirements of Resolution E-4481 (Resolution). AL 3902-E-C established a new Rate Schedule NEMV, PG&E's virtual net energy metering tariff for a multi-tenant or multi-meter property served behind the same service delivery point.

In addition to approving NEMV, OP 8 of the Resolution requires the investor owned utilities (IOUs) to proceed as follows:

“The IOUs shall work with Generating Account Owners and will initiate discussions with the Joint Solar Parties and the Commission to identify data that can be provided to the Generating Account Owner to enable them to verify that Benefiting Account holders are properly credited. These discussions and subsequent solutions should take into account potential relevant outcomes of the Smart Grid Rulemaking (R.08-12-009). Within six months<sup>3</sup> of this resolution the IOUs shall file Advice Letters with proposed solutions to this issue.”

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<sup>1</sup> Resolution E-4481 that was approved on April 19 can be found at:

[http://docs.cpuc.ca.gov/PUBLISHED/AGENDA\\_RESOLUTION/164076.htm](http://docs.cpuc.ca.gov/PUBLISHED/AGENDA_RESOLUTION/164076.htm)

<sup>2</sup> AL 3902-E-C can be found at: [http://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC\\_3902-E-C.pdf](http://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_3902-E-C.pdf)

<sup>3</sup> Energy Division advised PG&E it should file by October 25, 2012.

In an effort to better understand the information needs of the NEMV System Owner (Owner), the IOUs hosted a joint workshop on August 3, 2012, to address specific options that could be provided to the Owners to satisfy the requirements of OP 8 without violating any customer privacy requirements.

At the workshop, the IOUs proposed to provide a monthly summary included in the Generating Accounts' monthly NEMV statement consisting of: (1) the total generation output in kWh and (2) the percentage of those kWh allocated to each of the benefitting accounts. This approach has many advantages since it does not require additional work from the Owner and does not need any customer release forms to be completed. In addition, the IOUs offered other ways in which the Owner could receive Benefitting Account information today through the current IOUs' existing customer authorization release form process and through the Green Button option.

Participants were then able to provide feedback and share their vision of information that would be useful to them. This included everything from 15-minute interval generation data to IOU prepared reports summarizing all confidential Benefitting Account billing data that could be received electronically or online. Below is a summary of the two additional proposals discussed:

1.) Generator Account Report (Does not require Benefitting Account Customer Release Form)

- For the Generator Account:
  - Measured Generation (kWh) output in 15-minute intervals for the billing month
- For each Benefitting Account:
  - Service Address
  - Allocation Percentage
  - Allocated kWh by Interval or by TOU period if such information can be presented in a non-confidential manner (i.e., so that it does not reveal the Benefitting Account's rate schedule)

2.) Confidential Generator/Benefitting Account Billing Report (Only includes Benefitting Accounts for which a customer has provided a Customer Release Form.)

- For the Generator Account:
  - Measured Generation (kWh) output in 15-minute intervals for the billing month
- For Each Benefitting Account that has agreed to share this information:
  - Service Address
  - Allocation Percentage

- Allocated kWh by Interval or by TOU period
- The rate schedule of the customer (TOU, E1, etc.)
- Gross Consumption in kWh by TOU period of the applicable rate schedule as measured at the Benefitting Account's usage meter
- Net Consumption of allocated generation with each benefitting account's usage in kWh by TOU period of their rate schedule
- Peak or Net Demand in 15-minute intervals if the otherwise-applicable rate schedule has a demand charge

The IOUs and workshop participants explored the usefulness of these reports, discussed customer confidentiality issues, the anticipated costs to implement these options, and whether these costs outweighed the benefits. The take-away from this workshop was for the IOUs to investigate whether these two reports could be implemented, what the costs would be for the Owners, or whether it was more prudent to wait for the outcome of the Smart Grid Rulemaking, which is anticipated to develop a streamlined process for entities to access third party data.

Following this workshop, the IOUs continued to refine the proposed Generator Account Report and Confidential Generator/Benefitting Account Report through multiple teleconference meetings with CPUC Energy Division Staff and interested parties. Additionally, the IOUs jointly worked through their internal information technology and billing departments to develop initial cost estimates. They also explored leveraging existing systems for the preparation and delivery of the two reports.

In looking at the Generator Account Report described at the workshop, Energy Division Staff recommended the IOUs investigate the cost of providing 15-minute interval generation data online to the Owners at the participants urging. (This report would include this information in addition to providing the IOU's original proposal to provide a summary table on the generating account monthly NEMV statement.) PG&E identified the following considerations that would need to be addressed:

- This generating data would need to be provided to the Owner on a secure website (as it is still confidential customer information) that PG&E would have to set up and administer.
- The report preparation itself would require significant programming by PG&E to be able to prepare the generation data, as it would need to be verified and made consistent with regular billing data,<sup>4</sup> reformatted monthly with Benefitting Account allocations in an electronic file for Owners and posted to a secure website.
- There is already a standing requirement for all California Solar Initiative (CSI) participants to contract with a third party Performance Monitoring Reporting

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<sup>4</sup> The standard Validation, Editing and Estimation (VEE) process used for all PG&E's billing data.

Service (PMRS) required to provide 15-minute interval generation data to the Owner for solar generating systems greater than 10 kW<sup>5</sup> for a minimum of 5 years. This data is essentially duplicative of the interval data the IOUs would provide.

- PG&E would likely seek to establish a fee – either one time or monthly – to implement this 15-minute interval generation report online. This charge might be significant to the Owners given the limited number of NEMV participants at this time. PG&E estimates the one-time cost for PG&E to produce and deliver this report is approximately \$100,000. The IOUs would need to track Owners that want this report, in case every Owner does not want to pay the charge. The IOUs would also need to track payments of these charges into its accounting system to ensure that the full cost of implementing this report is recovered.
- There is a chance the Owners may not want this report once they can get the Confidential Generator/Benefitting Account Report as it will contain most of the same information, along with additional information.

Based on PG&E's discussion of this report with CPUC Energy Division Staff and the above considerations, PG&E does not recommend building this platform at this time.

In assessing the second report, the Confidential Generator/Benefitting Account Report, PG&E identified the following considerations, *in addition* to many of those identified above for the Generator Account Report:

- The cost of setting up the programming to net the Benefitting Account consumption data with the allocated generator data and provide it to the Owner will be significant.
- The execution and management of multiple customer release forms is necessary to limit the report content to only Benefitting Accounts that have provided appropriate current authorizations for each month at any given NEMV complex. Given the complexity of managing these release forms today, additional Information Technology (IT) development costs would be needed to maintain and update records to track customer authorizations for NEMV.
- The Smart Grid Rulemaking confidential data protocols are currently in the process of being developed. Once completed, it may provide a way to lower the cost to Owners for this report.

Given all the above reasons, the Energy Division and IOUs agreed that at this time it is too expensive and premature for the Owners to incur costs to develop a

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<sup>5</sup> The Performance Monitoring and Reporting Service (PMRS) in Section 5 on Metering Requirements found on page 93 of the CSI Handbook discussed their requirements.

“Confidential Generator/Benefitting Account Report.” The consensus is this report should not go forward at this time.

Instead of the above two reports, PG&E proposes to provide the “no cost” solution to Owners in the meantime as described in the next section. PG&E can have this report implemented by the end of 2012.

### **Conclusion**

Given the above described extensive review and the fact the Smart Grid proceeding review is still underway, PG&E proposes the following:

Proposed Option – “No Cost” Generator Account Report – This report provides the Owner a “no cost” monthly non-confidential report that would be included on the Owner’s detail of bill. Below is an illustrative sample of what will be provided in the report:

#### **Generator Account**

<b>Measured kWh</b>
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#### **Benefitting Account**

<b>Service Address</b>	<b>Allocation Percentage</b>	<b>Allocated kWh</b>
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123 ABC ST, APT 102	10%	100
123 ABC ST, APT 103	10%	100
123 ABC ST, APT 104	10%	100
123 ABC ST, APT 105	10%	100

At this time PG&E would propose to hold off on the other options for the reasons discussed above.

**Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or E-mail, no later than **November 14, 2012**, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
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 shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) 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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Rule 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) E-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Rule 3.11).

**Effective Date**

PG&E requests that this Tier 2 advice filing become effective on regular notice, **November 26, 2012**, which is the Monday following 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 Service List 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>

Handwritten signature of Brian Cherry in cursive script.

Vice President, Regulatory Relations

**Attachments**

cc: Paul Phillips – Energy Division  
Melicia Charles – Energy Division  
Gabe Petlin – Energy Division  
Amy Reardon – Energy Division  
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: **Shirley Wong**

Phone #: **(415) 972-5505**

E-mail: **slwb@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) #: **4130-E**

Tier: **2**

Subject of AL: **PG&E Proposal for Providing Billing Data to Owners of Projects Taking Service on Schedule NEMV, in Compliance with Ordering Paragraph 8 of Resolution E-4481**

Keywords (choose from CPUC listing): **Billing, Compliance, Metering**

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, OP 8**

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: **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: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: **November 26, 2012**

No. of tariff sheets: **N/A**

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:

Service affected and changes proposed:

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

ED Tariff Unit

505 Van Ness Ave., 4<sup>th</sup> Floor

San Francisco, CA 94102

EDTariffUnit@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

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

1st Light Energy	Department of General Services	North America Power Partners
AT&T	Department of Water Resources	North Coast SolarResources
Alcantar & Kahl LLP	Dept of General Services	Northern California Power Association
Ameresco	Douglass & Liddell	Occidental Energy Marketing, Inc.
Anderson & Poole	Downey & Brand	OnGrid Solar
BART	Duke Energy	PG&E
Barkovich & Yap, Inc.	Economic Sciences Corporation	Praxair
Bartle Wells Associates	Ellison Schneider & Harris LLP	R. W. Beck & Associates
Bloomberg	Foster Farms	RCS, Inc.
Bloomberg New Energy Finance	G. A. Krause & Assoc.	SCD Energy Solutions
Boston Properties	GLJ Publications	SCE
Braun Blaising McLaughlin, P.C.	GenOn Energy Inc.	SMUD
Brookfield Renewable Power	GenOn Energy, Inc.	SPURR
CA Bldg Industry Association	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Public Utilities Commission
CENERGY POWER	Green Power Institute	Seattle City Light
CLECA Law Office	Hanna & Morton	Sempra Utilities
California Cotton Ginners & Growers Assn	Hitachi	Sierra Pacific Power Company
California Energy Commission	In House Energy	Silicon Valley Power
California League of Food Processors	International Power Technology	Silo Energy LLC
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Edison Company
Calpine	Lawrence Berkeley National Lab	Spark Energy, L.P.
Cardinal Cogen	Los Angeles County Office of Education	Sun Light & Power
Casner, Steve	Los Angeles Dept of Water & Power	Sunrun Inc.
Center for Biological Diversity	Luce, Forward, Hamilton & Scripps LLP	Sunshine Design
Chris, King	MAC Lighting Consulting	Sutherland, Asbill & Brennan
City of Palo Alto	MRW & Associates	Tecogen, Inc.
City of Palo Alto Utilities	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
City of San Jose	Marin Energy Authority	TransCanada
City of Santa Rosa	McKenzie & Associates	Turlock Irrigation District
Clean Energy Fuels	Merced Irrigation District	United Cogen
Clean Power	Modesto Irrigation District	Utility Cost Management
Coast Economic Consulting	Morgan Stanley	Utility Specialists
Commercial Energy	Morrison & Foerster	Verizon
Consumer Federation of California	Morrison & Foerster LLP	Wellhead Electric Company
Crossborder Energy	NLine Energy, Inc.	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP	NRG West	eMeter Corporation
Day Carter Murphy	NaturEner	
Defense Energy Support Center	Norris & Wong Associates	