

August 4, 2003

**Advice 2477-G  
(Pacific Gas and Electric Company ID U39 E)**

Public Utilities Commission of the State of California (CPUC)

**Subject: Proposed Changes to Ordered Removed Meter Groups**

Pacific Gas and Electric Company (PG&E) hereby submit for filing the Proposed Changes to Ordered Removed Meter Groups.<sup>1</sup>

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby requests to California Public Utilities Commission (CPUC) permission to modify the way that the Company currently deviates from Section 13 (a) of CPUC General Order No. 58-A, *Standards of Gas Service*, to amend PG&E's gas meter control program for testing and controlling the performance of its gas meters.

Rule 13 (c) of General Order No. 58-A specifies that: *"Under certain conditions utilities may be authorized to deviate from Rule 13 (a) and use a statistical meter control program based upon meter performance as demonstrated by sample testing in lieu of periodic testing of each meter. Applications to deviate shall be based upon accepted principles of statistical sampling."*

PG&E routinely installs and replaces its gas meters based upon a statistical sampling program as described in PG&E's report the *"Gas Meter Performance Control Program,"* which is filed annually with the CPUC. The current method of evaluating groups of meters that may need to be "ordered removed" from service has been authorized by the CPUC in the following series of decisions and

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<sup>1</sup> PG&E reserves all legal rights to challenge the decisions or statutes under which it has been required to make this advice filing, and nothing in this advice filing constitutes a waiver of such rights. Also, PG&E reserves any additional legal rights to challenge the requirement to make this advice filing by reason of its status as a debtor under Chapter 11 of the Bankruptcy Code, and nothing in this advice filing constitutes a waiver of such rights.

resolutions:

- CPUC Resolution No. G-1381 (June 27, 1967)
- CPUC Resolution No. G-1569 (December 13, 1972)
- CPUC Resolution No. G-2681 (June 25, 1986)
- CPUC Resolution No. G-3302 (March 15, 2001)

This requested modification applies to all gas meters of 1000 cubic foot per hour capacity or less.

### **Proposed Change**

PG&E proposes to revise the length of time it has to remove groups of meters from service from the present eighteen months to a proposed three years. Specifically this change would revise the text on page 3 of Section I of the Company's "*Gas Meter Performance Control Program Annual Report*" to read as follows:

"Meter control groups that do not meet performance standards will be reported separately and scheduled for removal. All unsatisfactory groups will be completely removed within three years after the end of the test period".

### **Impacts**

The proposed change will allow PG&E to improve the accuracy of its forecasts of the number of gas meters to be included in the gas scheduled meter change (SMC) program as part of PG&E's future General Rate Case (GRC) filings. It will also allow PG&E to manage better the gas SMC program year-to-year spending. With this proposal, PG&E anticipates a very small impact to PG&E's system-wide meter accuracy of about one tenth of one percent, i.e. 0.10%.

### **Beneficial to the Ratepayer**

This proposal would benefit ratepayers by improving workforce utilization. PG&E has implemented numerous efforts to improve productivity over the past several years, and expects to continue to do so, as explained in its 2003 GRC testimony Exhibit 2, Chapter 10. This proposed variance would support these efforts.

By extending the time to remove a meter from eighteen months to three years, PG&E would be able to eliminate the peaks and valleys in the present SMC workload. This would help PG&E provide better service to customers needing pilot relights or other critical gas service needs.

In addition, by leveraging the workload, PG&E would be in a better position to

schedule and plan the work thereby improving productivity, which will aid PG&E's ongoing efforts to control its costs and will ultimately benefit ratepayers

### **Conclusion**

PG&E believes that the requested revision will optimize the Gas Meter Performance Control Program operations and maintain meter accuracy without negative impacts on customer service. No significant impact on expenses is forecast during the GRC test period, however the requested revision is expected to enhance the productivity of PG&E's meter maintenance workforce over time.

This filing will not increase any rate or charge, conflict with other schedules or rules, nor cause a withdrawal of service.

### **Protests**

In compliance with General Order 96-A, anyone wishing to protest this filing may do so by sending a letter by **August 24, 2003**, which is **20 days** from the date of this filing. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. Protests should be mailed to:

IMC Branch Chief – Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102  
Facsimile: (415) 703-2200  
E-mail: [jjr@cpuc.ca.gov](mailto:jjr@cpuc.ca.gov)

Protests also should be sent by e-mail and facsimile to Mr. Jerry Royer, Energy Division, as shown above, and by U.S. mail to Mr. Royer at the above address.

The protest should be sent via both e-mail and facsimile to PG&E on the same date it is mailed or delivered to the Commission at the address shown below.

Pacific Gas and Electric Company  
Attention: Brian Cherry  
Director, Regulatory Relations  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177  
Facsimile: (415) 973-7226  
E-mail: [RxDd@pge.com](mailto:RxDd@pge.com)

However, in consideration of the need to begin implementation of the SPP as quickly as possible to meet the Summer 2003 requirements, PG&E respectfully requests expedited treatment of this advice filing.

### **Effective Date**

In compliance with G.O. 96-A, PG&E respectfully requests that this advice filing become effective on **September 3, 2003**, which is 40-days from the date of filing.

### **Notice**

In accordance with General Order 96-A, Section III, Paragraph G, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list. Address changes should be directed to Sandra Ciach at (415) 973-7572. Advice letter filings can also be accessed electronically at:

[http://www.pge.com/customer\\_services/business/tariffs/](http://www.pge.com/customer_services/business/tariffs/)

Vice President - Regulatory Relations

Attachments