

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3288

Tel. No. (415) 703-1691



March 18, 2005

Advice Letter 2560-G|2534-E

Mr. Brian Cherry
Director, Regulatory Relations
Pacific Gas and Electric Company
Mail Code B10C, P. O. Box 770000
San Francisco, CA 94177

Subject: Revision of Gas and Electric Rule 9 – Rendering and Payment of Bills - Late
Payment Fee

Dear Mr. Cherry:

With this letter, the Energy Division rejects Pacific Gas and Electric Company (PG&E) Advice Letter 2560-G/2534-E. That advice letter requested authority to assess a late payment fee on overdue customer's bills.

Commissioner Peevey's Assigned Commissioner's Ruling dated February 25, 2005 in Application 02-11-017, et al, granted a motion for an investigation into PG&E's billing and collection practices. That Ruling placed the investigation into PG&E's billing and collection practices in Investigation (I.) 03-01-012. That Ruling also included PG&E's Advice Letter 2560-G/2534-E and the effect of PG&E's Cordaptix System on the utility's billing practices in I.03-01-012.

Since the issues in Advice Letter 2560-G/2534-E, now to be addressed in I.03-01-012, must be addressed before PG&E can be authorized to charge a late payment fee, the advice letter is unnecessary.

A copy of the advice letter marked "rejected" is being returned for your use.

Sincerely,

A handwritten signature in black ink, appearing to read "S. H. Gallagher". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

Sean H. Gallagher
Director
Energy Division

Cc: Mark Pocta, Office of Ratepayer Advocates
Matthew Freedman, The Utility Reform Network
Julie Halligan, Administrative Law Judge, CPUC
Maurice Monson, Energy Division, CPUC



**Pacific Gas and
Electric Company**

Brian K. Cherry
Director
Regulatory Relations

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July 20, 2004

Advice 2560-G/2534-E
(Pacific Gas and Electric Company ID U39M)

Subject: Revise Gas and Electric Rule 9 to Establish Late Payment Fee

Public Utilities Commission of the State of California

Pacific Gas and Electric Company (PG&E) hereby submits for filing revisions to its gas and electric tariffs. The affected tariff sheets are listed on the enclosed Attachment 1.

Purpose

PG&E hereby revises its gas and electric Rule 9 in compliance with Decision (D.) 95-12-055, Ordering Paragraph (OP) 2, issued by the Commission on December 20, 1995.

Background

During Phase 1 of PG&E's General Rate Case for test year 1996, PG&E requested conditional permission to implement a monthly late payment fee of one (1) percent on past due accounts for residential and non-residential customers, with the exception of state government facilities and California Alternate Rates for Energy (CARE) customers. The Commission approved PG&E's request.

In D. 95-12-055, the Commission ordered PG&E to submit an advice letter no less than 60 days prior to implementation of the late payment fee demonstrating the "efficacy" of PG&E's billing system following system testing (OP 2). The requirement for demonstrating "efficacy" was based on interveners' concerns about implementing the late payment fee in PG&E's prior customer information system (CIS) (often referred to as PG&E's Legacy CIS). PG&E's Legacy CIS was not initially designed to accommodate a late payment fee and was, even in 1995, already thought to be an "outdated" system that carried a "risk of system error." (D.95-12-055, p. 13.)

Circumstances have changed since 1995. In late 2002, PG&E replaced its Legacy CIS with a vendor-supplied CIS called CorDaptix. CorDaptix offers late payment fee functionality as part of its base system, which PG&E has, to date, not

yet implemented. The CorDaptix late payment fee module is proven functional, accurate, and adaptable, and is currently being used by several energy utilities worldwide. PG&E is now in the process of working with its vendor to modify the CorDaptix late payment fee module to PG&E's business rules.

Although many of the concerns raised by interveners in late 1995 about implementation of the late payment fee have, obviously, become obsolete, PG&E remains sensitive to the need for adequate testing to ensure proper functioning of the late payment fee module in CorDaptix. Although the module has already undergone testing and use by PG&E's vendor, the module will still need to be installation-tested on PG&E's system immediately prior to implementation, taking into consideration whatever rate changes or system changes have been made up to the point of implementation. Furthermore, PG&E will conduct a post-implementation review to ensure that the late payment fee is functioning properly and PG&E will report any unexpected findings to the Energy Division.

To the extent that PG&E's reviews – either prior to, or subsequent to implementation – show that the payment fee functionality does not function properly, PG&E will suspend implementation of the late payment fee. PG&E also will be submitting annual reports to the Commission concerning the implementation of the late payment fee, as required by OP 3 of D.95-12-055. PG&E believes that given the changed circumstances described above, its course of testing and review will fulfill the Commission's intent to ensure the "efficacy" of PG&E's billing system. Because installation testing will be complete prior to implementation of the late payment fee, PG&E does not believe the 60-day lag period is necessary.

Tariff Revisions

PG&E proposes to add new Section N to gas and electric Rule 9--*Rendering and Payment of Bills*, to describe the late payment fee:

A Late Payment Fee (LPF) of one percent (1%) per month may be applied to the total amount of unpaid energy-related charges if the customer's payment is not received in a timely manner in accordance with PG&E's tariffs after issuance of a residential or nonresidential bill. Customers participating in the California Alternate Rates for Energy (CARE) program and State Governmental Agencies are exempt from the LPF.

Charges not subject to the late payment fee would be those amounts corresponding to Utility User's Tax, Energy Commission Tax, Electric Franchise Fee Surcharge and Gas Franchise Fee Surcharge. All other types of charges would be subject to the late payment fee, including, but not limited to, amounts corresponding to DWR charges, public purpose programs, decommissioning

costs, reconnection charges following discontinuance of service, and non-bypassable charges.

Annual Reporting

In compliance with OP 3 of D. 95-12-055, PG&E proposes to submit annual reports to the Energy Division commencing six months after the approval of and implementation of the late payment fee. The annual reports will describe any system problems or changes related to the late payment fee, identify by quantity and nature customer complaints related to late payment fees or discontinuance of service because of late payment fees and the number of late payment fees assessed by customer class.

Protests

Anyone wishing to protest this filing may do so by sending a letter by **August 9, 2004**, 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, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: 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

Effective Date

PG&E requests that this advice filing become effective on the notice required in D.95-12-055, **September 18, 2004**, which is 60 days after the date of this filing.

PG&E will notify all customers in two bill inserts, the first of which is scheduled to be included with August bills, that establishment of the late payment fee is pending approval from the CPUC and may be authorized by mid-September for use by the end of this year. PG&E also will add a statement to the back of customer bills as follows: "Past due amounts are subject to a late payment charge of 1%".

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 Rose de la Torre at (415) 973-4716. Advice letter filings can also be accessed electronically at:

<http://www.pge.com/tariffs>

Handwritten signature of Brian K. Cherry in cursive script.

Director, Regulatory Relations

Attachments

**ATTACHMENT I
ADVICE 2560-G**

<u>Cal. P.U.C. Sheet No.</u>	<u>Title of Sheet</u>	<u>Canceling Cal P.U.C. Sheet No.</u>
22590-G	Rule 9—Rendering and Payment of Bills	21936-G
22591-G	Table of Contents (Cont'd) – Rules	22509-G
22592-G	Table of Contents	22586-G

ADVICE 2534-E

<u>Cal. P.U.C. Sheet No.</u>	<u>Title of Sheet</u>	<u>Canceling Cal P.U.C. Sheet No.</u>
22024-E	Rule 9—Rendering and Payment of Bills	20974-E
22025-E	Table of Contents (Cont'd) - Rules	21673-E
22026-E	Table of Contents	21829-E



RULE 9—RENDERING AND PAYMENT OF BILLS
(Continued)

L. ELECTRONIC BILL PRESENTATION AND PAYMENT

At the mutual option of the Customer and PG&E, the Customer may elect to receive, view, and pay regular bills for service electronically and to no longer receive paper bills and legal and mandated notices. Customers requesting this option may be required to complete additional forms and agreements. Legal and mandated notices shall be included with PG&E's electronic transmittal; except, however, all notices of termination of service for nonpayment shall be delivered by U.S. Mail. Either party may discontinue Electronic Billing upon 30-days prescribed notice.

Customers choosing to use an alternative payment method, such as a bill aggregator or financial institution, may be charged a fee by the third party. All complaints regarding alternative payment methods shall be directed to PG&E.

M. PRIVACY OF CUSTOMER INFORMATION

To preserve customer privacy, PG&E will not release confidential information, including financial information, to a third party without the customer's electronic signature or the written consent.

N. LATE PAYMENT FEE

A Late Payment Fee (LPF) of one percent (1%) per month may be applied to the total amount of unpaid energy-related charges if the customer's payment is not received in a timely manner in accordance with PG&E's tariffs after issuance of a residential or nonresidential bill. Customers participating in the California Alternate Rates for Energy (CARE) program and State Governmental Agencies are exempt from the LPF.

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RULE 9—RENDERING AND PAYMENT OF BILLS
(Continued)

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Advice Letter No. 2534-E
Decision No. 95-12-055

Issued by
Karen A. Tomcala
Vice President
Regulatory Relations

Date Filed July 20, 2004
Effective
Resolution No.



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Advice Letter No. 2534-E
Decision No. 95-12-055

Issued by
Karen A. Tomcala
Vice President
Regulatory Relations

Date Filed July 20, 2004
Effective _____
Resolution No. _____

**PG&E Gas and Electric Advice
Filing List
General Order 96-A, Section III(G)**

ABAG Power Pool
Accent Energy
Aglet Consumer Alliance
Agnews Developmental Center
Ahmed, Ali
Alcantar & Elsesser
Anderson Donovan & Poole P.C.
Applied Power Technologies
APS Energy Services Co Inc
Arter & Hadden LLP
Avista Corp
Barkovich & Yap, Inc.
BART
Bartle Wells Associates
Blue Ridge Gas
Bohannon Development Co
BP Energy Company
Braun & Associates
C & H Sugar Co.
CA Bldg Industry Association
CA Cotton Ginners & Growers Assoc.
CA League of Food Processors
CA Water Service Group
California Energy Commission
California Farm Bureau Federation
California Gas Acquisition Svcs
California ISO
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Calpine Corp
Calpine Gilroy Cogen
Cambridge Energy Research Assoc
Cameron McKenna
Cardinal Cogen
Cellnet Data Systems
Chevron Texaco
Chevron USA Production Co.
Childress, David A.
City of Glendale
City of Healdsburg
City of Palo Alto
City of Redding
CLECA Law Office
Constellation New Energy
CPUC
Creative Technology
Cross Border Inc
Crossborder Inc
CSC Energy Services
Davis, Wright Tremaine LLP
Davis, Wright, Tremaine, LLP
Defense Fuel Support Center
Department of the Army
Department of Water & Power City

Dept of the Air Force
DGS Natural Gas Services
DMM Customer Services
Downey, Brand, Seymour & Rohwer
Duke Energy
Duke Energy North America
Duncan, Virgil E.
Dutcher, John
Dynergy Inc.
Ellison Schneider
Energy Law Group LLP
Enron Energy Services
Exelon Energy Ohio, Inc
Exeter Associates
Foster Farms
Foster, Wheeler, Martinez
Franciscan Mobilehome
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Gruneich Resource Advocates
Hanna & Morton
Heeg, Peggy A.
Hogan Manufacturing, Inc
House, Lon
Imperial Irrigation District
Integrated Utility Consulting Group
International Power Technology
Interstate Gas Services, Inc.
J. R. Wood, Inc
JTM, Inc
Kaiser Cement Corp
Korea Elec Power Corp
Luce, Forward, Hamilton & Scripps
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Maynor, Donald H.
McKenzie & Assoc
McKenzie & Associates
Meek, Daniel W.
Mirant California, LLC
Modesto Irrigation Dist
Morrison & Foerster
Morse Richard Weisenmiller & Assoc.
Navigant Consulting
New United Motor Mfg, Inc
Norris & Wong Associates
North Coast Solar Resources
Northern California Power Agency
Office of Energy Assessments
Palo Alto Muni Utilities

PG&E National Energy Group
Pinnacle CNG Company
PITCO
Plurimi, Inc.
PPL EnergyPlus, LLC
Price, Roy
Product Development Dept
Provost Pritchard
R. M. Hairston & Company
R. W. Beck & Associates
Recon Research
Regional Cogeneration Service
RMC Lonestar
Sacramento Municipal Utility District
SCD Energy Solutions
Seattle City Light
Sempra
Sempra Energy
Sequoia Union HS Dist
SESCO
Sierra Pacific Power Company
Silicon Valley Power
Simpson Paper Company
Smurfit Stone Container Corp
Southern California Edison
SPURR
St. Paul Assoc
Stanford University
Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tansev and Associates
Tecogen, Inc
TFS Energy
TJ Cross Engineers
Transwestern Pipeline Co
Turlock Irrigation District
U S Borax, Inc
United Cogen Inc.
URM Groups
Utility Cost Management LLC
Utility Resource Network
Wellhead Electric Company
Western Hub Properties, LLC
White & Case
WMA