

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



October 24, 2006

Advice Letter 2744-G/2861-E  
2744-G-A/2861-E-A

Rose de la Torre  
Pacific Gas & Electric  
77 Beale Street, Room 1088  
Mail Code B10C  
San Francisco, CA 94105

Subject: Request for authority to commence a credit card option pilot program for a 12 month period

Dear Ms de la Torre:

Advice Letter 2744-G/2861-E and 2744-G-A/2861-E-A is effective October 6, 2006 by Resolution G-3390. A copy of the advice letter is returned herewith for your records.

Sincerely,

Sean H. Gallagher, Director  
Energy Division

<b>REGULATORY RELATIONS</b>	
Tariffs Section	
M Brown	D Poster
R Dela Torre	S Ramaiya
B Lam	
OCT 13 2006	
_____ Records _____	
Return to _____	File _____
cc to _____	



**Brian K. Cherry**  
Vice President  
Regulatory Relations

77 Beale Street, Room 1087  
San Francisco, CA 94105

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Mail Code B10C  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177

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Internal: 223.4977  
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Internet: BKC7@pge.com

July 14, 2006

**Advice 2744-G/2861-E**  
(Pacific Gas and Electric Company ID U39 M)

**Subject: Pilot Credit Card Payment Option**

Public Utilities Commission of the State of California

**Purpose**

In this advice filing Pacific Gas and Electric Company (PG&E) seeks authorization to commence a 12-month pilot credit card payment option for PG&E customers. For those customers participating in this program, there will not be a transaction charge for the use of an accepted credit card for utility bill payment.

During this pilot project PG&E proposes to make credit card payment options available to customers (1) through a third-party operated pay-by-phone service, which would be available either through a call to PG&E's customer service line or at PG&E's local office; (2) through certain incoming and outgoing calls to or from PG&E; and (3) through PG&E online. Each of these options includes both one-time payments and a recurring billing payment option. If a customer opts for a recurring billing payment option, all future paper bills will be suppressed in accordance with Rule 9(L) and will be contingent upon the PG&E customer submitting a valid email address. All credit card payment options will initially be available to residential customers only, but may be open over the course of the pilot to one or more additional class of customers.

Savings are expected to be associated with: (1) migrating payments from some higher cost payment channels to lower cost payment channels; (2) avoiding check processing fees for those customers who pay by credit card that statistically would have paid by check; and (3) customers signing up for PG&E's paperless billing option, e-Bills, thereby saving costs associated with paper billing, including postage.

There also will be indirect savings to customers, such as avoided postage costs, and/or mileage costs to a payment center which PG&E will attempt to quantify during the course of this pilot program. Other indirect savings will not be quantifiable but will provide a significant benefit to customers which should also be considered in evaluating the viability of the pilot program. These include but are not limited to: (1) the availability of another payment option to all credit card holders; and (2) the ability for credit card holders to assist in budgeting dollars and timing of payments.

In addition to the benefits, PG&E expects certain costs to increase. Increased costs are expected to be associated with: (1) the potential for payments to migrate from lower cost options; (2) transaction fees charged by the credit card company and the third-party processor; (3) potential charges associated with investigation and reversal of credit card payments; and (4) systemic costs associated with installation and maintenance of any necessary infrastructure and training to support credit card payments.

PG&E proposes to run the pilot for approximately 12 months and then file a report with the Commission summarizing the results of the pilot and recommending next steps. This advice filing proposes that the pilot will continue in place until the Commission has reached a decision on PG&E's written recommendation.

In this report, PG&E plans to review the payment channels previously used by each of the credit card users, and the average costs associated therein, for the 12 months prior to the commencement of the pilot period. PG&E will then compare those costs with the costs and savings that occur as a result of the customer's credit card usage during the pilot program. Such a comparison will give a valid indication of how customer migration among different payment channels—all with different average costs—will affect PG&E's total payment processing costs, thus accomplishing the primary goal of the pilot program to determine whether customers should be cumulatively indifferent to a credit card service offering.

### **Background**

Assembly Bill 746 passed in September 2005 requires the CPUC to make certain regulatory findings associated with credit card usage. The purpose of this advice filing is to establish a program that will provide the needed data concerning the costs and savings associated with an embedded fee credit card option. Under an embedded fee arrangement, the individual customer utilizing the credit card service is not charged directly for the costs associated with utilizing a credit card to make a utility payment. This is different from a transaction cost based program which requires the customer utilizing a credit card to pay a transaction fee for the use of a credit card.

The pilot program will provide valuable information concerning customer usage trends, preferences and behavior and assist the Commission and PG&E in making the necessary regulatory finding. This information will also assist in designing an effective long-term credit card program.

PG&E also wants to clarify that this is a market test program and the payment options mentioned above could potentially be removed from available PG&E payment options in the future.

### **Tariff Changes**

#### **Gas and Electric Rule 9**

PG&E proposes to add a new section to both the gas and the electric Tariff Rule 9(E)(5)(b) which provides "A credit card option, on a pilot basis, will be available to customers (1) through a third-party operated pay-by-phone service, which would be available either through a call to PG&E's customer service line or at PG&E's local office; (2) through certain incoming and outgoing calls to or from PG&E; and (3) through PG&E online. Each of these options includes both one-time payments and a recurring billing payment option. Options (1) and (2) are contingent upon the PG&E customer submitting a valid email address and expressly agreeing via email to the suppression of all future paper bills in a manner consistent with the requirements of Rule 9 (L). If a customer opts for a recurring billing payment under option (3) above, all future paper bills will also be suppressed in accordance with Rule 9 (L). All credit card payment options will initially be available to residential customers only, but may be open over the course of the pilot to one or more additional class of customers. This program will either continue indefinitely, continue as modified by PG&E or Commission decision, or be terminated by PG&E or the Commission decision rendered at the conclusion of the pilot program."

#### **Preliminary Statement Memorandum Account**

This advice letter also requests that the CPUC permit PG&E to establish a memorandum account to track costs and savings associated with the acceptance of these credit card payments (see attached Preliminary Statements).

### **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 August 3, 2006, which is **20 days** after the date of this filing.

CPUC Energy Division  
Attention: Tariff Unit, 4<sup>th</sup> Floor  
505 Van Ness Avenue  
San Francisco, California 94102

Facsimile: (415) 703-2200

E-mail: [jjr@cpuc.ca.gov](mailto:jjr@cpuc.ca.gov) and [inj@cpuc.ca.gov](mailto:inj@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:

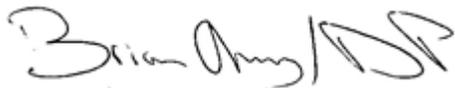
Pacific Gas and Electric Company  
Attention: Brian Cherry  
Vice President, Regulatory Relations  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177  
Facsimile: (415) 973-7226  
E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

### **Effective Date**

PG&E requests that this advice filing become effective on regular notice, August 13, 2006, which is **30 days** after 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 Rose de la Torre at (415) 973-4716. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>



Vice President -- Regulatory Relations

Attachment 1 --Tariff Sheets

Attachment 2 – Credit Card Workshop List

cc: Service List – Credit Card Workshop Attendees List  
Kevin Coughlin – CPUC  
Karl Bemedefer – CPUC  
Gurbux Kahlon – CPUC  
Kerrie Evans - CPUC

# 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 U39M

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: David Poster

Phone #: (415) 973-1082

E-mail: dxpu@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) #: 2744-G/2861-E

Subject of AL: Pilot Credit Card Payment Option

Keywords (choose from CPUC listing): Credit Card Payments

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? If so, identify the prior AL:

Resolution Required?  Yes  No

Requested effective date: **8-13-2006**

No. of tariff sheets: 12

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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets:

**Protests 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

Utility Info (including e-mail)

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

[jjr@cpuc.ca.gov](mailto:jjr@cpuc.ca.gov) and [jnj@cpuc.ca.gov](mailto:jnj@cpuc.ca.gov)

<b>ATTACHMENT 1 Advice 2744-G</b>		
<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
24075-G	Preliminary Statement Part E--Credit Card Pilot Program memorandum Account (CCPPMA)	New
24076-G	Preliminary Statement Part E (Cont.)	New
24077-G	Rule 09--Rendering and Payment of Bills	22934-G
24078-G	Table of Contents -- Preliminary Statements	24038-G
24079-G	Table of Contents -- Rules	23787-G
24080-G	Table of Contents -- Rate Schedules	24069-G

<b>ATTACHMENT 1 Advice 2861-E</b>		
<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
25069-E	Preliminary Statement Part EG--Credit Card Pilot Program Memorandum Account (CCPPMA)	New
25070-E	Preliminary Statement Part EG (Cont.)	New
25071-E	Rule 09--Rendering and Payment of Bills	20969-E
25072-E	Table of Contents -- Rules, Maps, Contracts and Deviations	24602-E
25073-E	Table of Contents -- Preliminary Statements	25026-E
25074-E	Table of Contents -- Rate Schedules	24603-E



PRELIMINARY STATEMENT  
(Continued)

E. Credit Card Pilot Program Memorandum Account (CCPPMA)

(N)

1. PURPOSE:

The purpose of the CCPPMA is to track the savings and costs related to the Commission's authorization to commence a pilot credit card payment option for PG&E's customers. Once the pilot program has concluded, the Commission will determine if the savings and costs are cost-neutral or not. If the savings outweigh the costs, the costs and savings are roughly equal, or the Commission, for public policy reasons and in accordance with the legislation (AB 746), determines that the benefits justify a continuation of the program; PG&E will begin full implementation of the credit card program, as authorized by a Commission Decision. If the costs outweigh the savings and the program is not consistent with the legislative objectives, the pilot program will sunset on the date of the Commission Decision.

2. APPLICABILITY:

The CCPPMA shall apply to all residential customers, but only to such customers, unless otherwise directed by the Commission.

3. REVISION DATE:

Disposition of the amounts in this account shall be determined in the Annual Electric True-up Proceeding or other proceeding authorized by the Commission.

4. CCPPMA RATES:

The CCPPMA does not have a rate component.

5. ACCOUNTING PROCEDURE:

PG&E will make a credit or debit entry on a semi-annual basis to transfer all or a portion of the balance in the CCPPMA to the Distribution Revenue Adjustment Mechanism (DRAM) or its successor account for future rate recovery, as may be approved by the Commission. Incremental debits and credits of the CCPPMA include the following categories:

a. A credit equal to the estimated savings based on:

- 1) The migration of payments from some higher cost payment channels to lower cost payment channels.
- 2) Avoided check processing fees for those customers who pay by credit card that statistically would have paid by check.
- 3) Customers signing up for PG&E's paperless billing option, e-Bills, will avoid costs associated with paper billing, including postage.
- 4) Avoided postage costs, and/or mileage costs to a payment center which PG&E will attempt to quantify during the course of this pilot program.

(N)



PRELIMINARY STATEMENT  
(Continued)

E. Credit Card Pilot Program Memorandum Account (CCPPMA)

(N)

5. ACCOUNTING PROCEDURE: (Cont'd.)

b. A debit equal to the charges from:

- 1) The potential for payments to migrate from lower cost options.
- 2) Transaction fees charged by the credit card company and the third-party processor.
- 3) Potential charges associated with investigation and reversal of credit card payments.
- 4) System costs associated with installation and maintenance of any necessary infrastructure and training to support credit card payments

c. An entry equal to interest on the average balance in the CCPPMA at the beginning of the semi-annual period and the balance at the end of the previous semi-annual period after entries E.5.a and E.5.b above, 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)



RULE 9—RENDERING AND PAYMENT OF BILLS  
(Continued)

E. BILLS DUE ON PRESENTATION

Bills for gas service are due and payable upon presentation. Payments shall be received at the address imprinted on the payment stub attached to PG&E's bill, a business office of PG&E, or by an authorized agent of PG&E. Payments shall be made using the following options:

1. Cash, check, money order, or
2. Electronic data interchange (EDI) for commercial customers or recurring automatic bank debit (Wherein the customer requests the automatic monthly withdrawal of payment for utility services from a designated checking/banking account), or
3. Debit card by phone service or an electronic funds transfer the customer initiates through a third party (A transfer or transaction fee over and above the PG&E bill amount may be charged to the customer by a third-party vendor for these services), or
4. Electronic billing as defined in Rule 1, or
5. a. By other means mutually agreeable to PG&E and the customer.
- b. A credit card option, on a pilot basis, will be available to customers (1) through a third-party operated pay-by-phone service, which would be available either through a call to PG&E's customer service line or at PG&E's local office; (2) through certain incoming and outgoing calls to or from PG&E; and (3) through PG&E online. Each of these options includes both one-time payments and a recurring billing payment option. Options (1) and (2) are contingent upon the PG&E customer submitting a valid email address and expressly agreeing via email to the suppression of all future paper bills in a manner consistent with the requirements of Rule 9 (L). If a customer opts for a recurring billing payment under option (3), all future paper bills will also be suppressed in accordance with Rule 9 (L). All credit card payment options will initially be available to residential customers only, but may be open over the course of the pilot to one or more additional class of customers. This program will either continue indefinitely, continue as modified by PG&E or Commission decision, or be terminated by PG&E or the Commission decision rendered at the conclusion of the pilot program.

(N)  
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(N)

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PRELIMINARY STATEMENT  
(Continued)

EG. Credit Card Pilot Program Memorandum Account (CCPPMA)

(N)

1. PURPOSE:

The purpose of the CCPPMA is to track the savings and costs related to the Commission's authorization to commence a pilot credit card payment option for PG&E's customers. Once the pilot program has concluded, the Commission will determine if the savings and costs are cost-neutral or not. If the savings outweigh the costs, the costs and savings are roughly equal, or the Commission, for public policy reasons and in accordance with the legislation (AB 746), determines that the benefits justify a continuation of the program; PG&E will begin full implementation of the credit card program, as authorized by a Commission Decision. If the costs outweigh the savings and the program is not consistent with the legislative objectives, the pilot program will sunset on the date of the Commission Decision.

2. APPLICABILITY:

The CCPPMA shall apply to all residential customers, but only to such customers, unless otherwise directed by the Commission.

3. REVISION DATE:

Disposition of the amounts in this account shall be determined in the Annual Electric True-up Proceeding or other proceeding authorized by the Commission.

4. CCPPMA RATES:

The CCPPMA does not have a rate component.

5. ACCOUNTING PROCEDURE:

PG&E will make a credit or debit entry on a semi-annual basis to transfer all or a portion of the balance in the CCPPMA to the Distribution Revenue Adjustment Mechanism (DRAM) or its successor account for future rate recovery, as may be approved by the Commission. Incremental debits and credits of the CCPPMA include the following categories:

a. A credit equal to the estimated savings based on:

- 1) The migration of payments from some higher cost payment channels to lower cost payment channels.
- 2) Avoided check processing fees for those customers who pay by credit card that statistically would have paid by check.
- 3) Customers signing up for PG&E's paperless billing option, e-Bills, will avoid costs associated with paper billing, including postage.
- 4) Avoided postage costs, and/or mileage costs to a payment center which PG&E will attempt to quantify during the course of this pilot program.

(N)



PRELIMINARY STATEMENT  
(Continued)

EG. Credit Card Pilot Program Memorandum Account (CCPPMA)

(N)

5. ACCOUNTING PROCEDURE: (Cont'd.)

b. A debit equal to the charges from:

- 1) The potential for payments to migrate from lower cost options.
- 2) Transaction fees charged by the credit card company and the third-party processor.
- 3) Potential charges associated with investigation and reversal of credit card payments.
- 4) System costs associated with installation and maintenance of any necessary infrastructure and training to support credit card payments

c. An entry equal to interest on the average balance in the CCPPMA at the beginning of the semi-annual period and the balance at the end of the previous semi-annual period after entries EG.5.a and EG.5.b above, 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)





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**3/20/06 WORKSHOP FOR AB 746: CREDIT CARD PAYMENTS  
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Accent Energy	Douglass & Liddell	Pinnacle CNG Company
Aglet Consumer Alliance	Downey, Brand, Seymour & Rohwer	PITCO
Agnews Developmental Center	Duke Energy	Plurimi, Inc.
Ahmed, Ali	Duke Energy North America	PPL EnergyPlus, LLC
Alcantar & Elsesser	Duncan, Virgil E.	Praxair, Inc.
Ancillary Services Coalition	Dutcher, John	Price, Roy
Anderson Donovan & Poole P.C.	Dynegy Inc.	Product Development Dept
Applied Power Technologies	Ellison Schneider	R. M. Hairston & Company
APS Energy Services Co Inc	Energy Law Group LLP	R. W. Beck & Associates
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Avista Corp	Exelon Energy Ohio, Inc	Regional Cogeneration Service
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CA Water Service Group	Hitachi Global Storage Technologies	Southern California Edison
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California Farm Bureau Federation	House, Lon	St. Paul Assoc
California Gas Acquisition Svcs	Imperial Irrigation District	Stanford University
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Cameron McKenna	JTM, Inc	Turlock Irrigation District
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CPUC	Navigant Consulting	
Cross Border Inc	New United Motor Mfg, Inc	
Crossborder Inc	Norris & Wong Associates	
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Davis, Wright, Tremaine LLP	Northern California Power Agency	
Defense Fuel Support Center	Office of Energy Assessments	
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Department of Water & Power City	Palo Alto Muni Utilities	