

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 16, 2008

**Advice Letter 2969-G**

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

**Subject: Request for Approval of New Device for Heating Value  
Measurement in Accordance with General Order 58-B**

Dear Mr. Cherry:

Advice Letter 2969-G is effective December 14, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Lewis".

Kenneth Lewis, Acting Director  
Energy Division



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

77 Beale Street, Room 1087  
San Francisco, CA 94105

*Mailing Address*  
Mail Code B10C  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177  
Fax: 415.973.7226

November 14, 2008

**Advice 2969-G**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Request for Approval of New Device for Heating Value  
Measurement in Accordance with General Order 58B**

**Purpose**

The purpose of this advice letter is to request approval of a new gas chromatograph, Totalflow NGC 8206 (NGC 8206), for measuring the heating value of gaseous fuels for billing purposes. This advice letter is filed in accordance with General Order 58B, paragraph 5, which requires Commission approval for all devices measuring the heating value of gaseous fuels for billing.

Equipment testing was performed at PG&E's Tracy Station using gas from PG&E's transmission Line 2. The NGC 8206 produced results very similar to the chromatograph that is currently used. Testing data will be sent to the Commission in a confidential attachment.

**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 **December 4, 2008**, which is 20 days from the date of this 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: [jnj@cpuc.ca.gov](mailto:jnj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)

Copies 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) 973-7226  
E-mail: PGETariffs@pge.com

### **Effective Date**

PG&E requests that this advice filing, upon Energy Division approval, become effective **December 14, 2008**

### **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. Address changes should be directed to Rose De La Torre (415) 973-4716. Advice letter filings can also be accessed electronically at:

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



Vice President – Regulatory Relations

# 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 M)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Megan Lawson

Phone #: 415-973-1877

E-mail: mehr@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) #: 2969-G

Tier: [2]

Subject of AL: Request for Approval of New Device for Heating Value Measurement in Compliance with General Order 58B

Keywords (choose from CPUC listing): compliance

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: 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: December 14, 2008

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**

**Tariff Files, Room 4005**

**DMS Branch**

**505 Van Ness Ave., San Francisco, CA 94102**

**jn@cpuc.ca.gov and mas@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**

## Summary

### Percent Difference in Readings\*

	<b>SG</b>	<b>BTU</b>
Dec-07	0.071	0.035
Jul-08	0.047	0.043
Aug-08	0.057	0.036
<b>Average</b>	<b>0.058</b>	<b>0.038</b>

\*  $ABS(\text{Daniels read} - \text{NGC Read})/\text{Daniels Read}$

# NGC 8206 vs Daniels Series 500 GC Comparison

Tracy Station - August 2008

Date	NGC	DANIELS	% Difference	% Diff (ABS)	NGC	DANIELS	% Difference	% Diff (ABS)	
	BTU	BTU	BTU	BTU	Gravity	Gravity	Gravity	Gravity	
8/1/08	1023.8195	1024.22	0.4005	0.039	0.5838	0.584041	0.0002	0.034	
8/2/08	1024.6879	1025.29	0.6021	0.059	0.5855	0.58586	0.0004	0.068	
8/3/08	1021.2623	1021.05	-0.2123	0.021	0.5809	0.581386	0.0005	0.086	
8/4/08	1021.6036	1020.79	-0.8136	0.08	0.5806	0.580447	-0.0002	0.034	
8/5/08	1021.5895	1021.56	-0.0295	0.003	0.5807	0.580949	0.0002	0.034	
8/6/08	1025.5514	1026.19	0.6386	0.062	0.5842	0.585074	0.0009	0.154	
8/7/08	1023.2108	1022.81	-0.4008	0.039	0.5818	0.582326	0.0005	0.086	
8/8/08	1023.2569	1023	-0.2569	0.025	0.5838	0.583742	-0.0001	0.017	
8/9/08	1024.4241	1024.31	-0.1141	0.011	0.5847	0.584939	0.0002	0.034	
8/10/08	1023.9053	1024.33	0.4247	0.041	0.5842	0.584943	0.0007	0.12	
8/11/08	1021.3086	1021.1	-0.2086	0.02	0.5811	0.581454	0.0004	0.069	
8/12/08	1023.5498	1023.64	0.0902	0.009	0.5842	0.584252	0.0001	0.017	
8/13/08	1022.0425	1021.99	-0.0525	0.005	0.5822	0.582712	0.0005	0.086	
8/14/08	1023.3809	1022.78	-0.6009	0.059	0.5835	0.584133	0.0006	0.103	
8/15/08	1023.4395	1023.02	-0.4195	0.041	0.5843	0.584275	0	0	
8/16/08	1022.1761	1022.14	-0.0361	0.004	0.5825	0.582994	0.0005	0.086	
8/17/08	1021.1328	1020.97	-0.1628	0.016	0.5824	0.582399	0	0	
8/18/08	1021.025	1020.49	-0.535	0.052	0.5817	0.581909	0.0002	0.034	
8/19/08	1021.7917	1022.32	0.5283	0.052	0.583	0.583563	0.0006	0.103	
8/20/08	1020.2379	1019.95	-0.2879	0.028	0.5873	0.587636	0.0003	0.051	
8/21/08	1021.45	1021.83	0.38	0.037	0.5837	0.583756	0.0001	0.017	
8/22/08	1021.3198	1021.14	-0.1798	0.018	0.583	0.583289	0.0003	0.051	
8/23/08	1021.3393	1020.88	-0.4593	0.045	0.5828	0.5829	0.0001	0.017	
8/24/08	1021.9242	1021.45	-0.4742	0.046	0.5854	0.585741	0.0003	0.051	
8/25/08	1019.9595	1020.49	0.5305	0.052	0.5813	0.581539	0.0002	0.034	
8/26/08	1020.0765	1020.24	0.1635	0.016	0.5819	0.582278	0.0004	0.069	
8/27/08	1020.2035	1019.78	-0.4235	0.042	0.5791	0.579613	0.0005	0.086	
8/28/08	1020.439	1021.06	0.621	0.061	0.5807	0.581007	0.0003	0.052	
8/29/08	1018.3035	1018.64	0.3365	0.033	0.5794	0.579506	0.0001	0.017	
8/30/08	1021.0714	1020.38	-0.6914	0.068	0.5804	0.580485	0.0001	0.017	
8/31/08	1022.1589	1022.47	0.3111	0.03	0.5812	0.581988	0.0008	0.137	
<b>Average % Difference =</b>				<b>0.036</b>					<b>0.057</b>

# NGC 8206 vs Daniels Series 500 GC Comparison

Tracy Station - July 2008

Date	NGC BTU	DANIELS BTU	% Difference BTU	% Diff (ABS) BTU	NGC Gravity	DANIELS Gravity	% Difference Gravity	% Diff (ABS) Gravity
07/01/08	1019.9097	1020.4	0.4903	0.048	0.5829	0.583311	0.0004	0.069
07/02/08	1021.3519	1020.32	-1.0319	0.101	0.5809	0.58013	-0.0008	0.138
07/03/08	1020.382	1020.67	0.288	0.028	0.5844	0.584195	-0.0002	0.034
07/04/08	1020.8922	1020.21	-0.6822	0.067	0.5847	0.58446	-0.0002	0.034
07/05/08	1021.4282	1021.08	-0.3482	0.034	0.5842	0.584207	0	0
07/06/08	1021.0355	1020.00	-1.0355	0.102	0.5836	0.583665	0.0001	0.017
07/07/08	1021.1804	1021.70	0.5196	0.051	0.5841	0.584514	0.0004	0.068
07/08/08	1022.0673	1021.97	-0.0973	0.01	0.5847	0.584467	-0.0002	0.034
07/09/08	1018.5638	1018.35	-0.2138	0.021	0.5787	0.578622	-0.0001	0.017
07/10/08	1015.3816	1016.08	0.6984	0.069	0.5765	0.576777	0.0003	0.052
07/11/08	1022.8016	1023.31	0.5084	0.05	0.5825	0.582525	0	0
07/12/08	1022.6572	1021.82	-0.8372	0.082	0.5808	0.581633	0.0008	0.138
07/13/08	1020.0153	1020.02	0.0047	0	0.5814	0.581976	0.0006	0.103
07/14/08	1020.474	1019.87	-0.604	0.059	0.5835	0.584174	0.0007	0.12
07/15/08	1024.7504	1025.17	0.4196	0.041	0.5853	0.585404	0.0001	0.017
07/16/08	1023.0677	1023.1	0.0323	0.003	0.5823	0.582566	0.0003	0.051
07/17/08	1019.9446	1019.9	-0.0446	0.004	0.5802	0.580159	0	0
07/18/08	1020.2821	1020.44	0.1579	0.015	0.5804	0.58051	0.0001	0.017
07/19/08	1018.76	1019.42	0.66	0.065	0.5789	0.579106	0.0002	0.035
07/20/08	1025.9965	1025.8	-0.1965	0.019	0.5838	0.583961	0.0002	0.034
07/21/08	1021.787	1021.73	-0.057	0.006	0.5815	0.581548	0	0
07/22/08	1022.5739	1021.73	-0.8439	0.083	0.5813	0.581423	0.0001	0.017
07/23/08	1021.0401	1020.78	-0.2601	0.025	0.5802	0.580556	0.0004	0.069
07/24/08	1018.8033	1019.19	0.3867	0.038	0.579	0.579728	0.0007	0.121
07/25/08	1017.3568	1017.83	0.4732	0.046	0.5777	0.577837	0.0001	0.017
07/26/08	1023.7155	1023.83	0.1145	0.011	0.5828	0.583302	0.0005	0.086
07/27/08	1023.5131	1022.93	-0.5831	0.057	0.5826	0.582749	0.0001	0.017
07/28/08	1023.342	1022.41	-0.932	0.091	0.5813	0.581709	0.0004	0.069
07/29/08	1023.1923	1022.64	-0.5523	0.054	0.5814	0.581871	0.0005	0.086
07/30/08	1021.838	1021.48	-0.358	0.035	0.5815	0.58155	0	0
07/31/08	1021.7808	1021.67	-0.1108	0.011	0.5811	0.581079	0	0
<b>Average % difference =</b>			<b>0.043</b>					<b>0.047</b>

# NGC 8206 vs Daniels Series 500 GC Comparison

Tracy Station - December 2007

Date	NGC BTU	DANIELS BTU	% Difference BTU	% Difference BTU	NGC Gravity	DANIELS Gravity	% Difference Gravity	% Difference Gravity	
12/1/2007	1017.7691	1018.64	-0.085	0.085	0.5823	0.583295	-0.171	0.171	
12/2/2007	1019.6578	1020.12	-0.045	0.045	0.5838	0.584192	-0.067	0.067	
12/3/2007	1023.2312	1022.84	0.038	0.038	0.5823	0.582925	-0.107	0.107	
12/4/2007	1019.7468	1019.74	0.001	0.001	0.5811	0.581057	0.007	0.007	
12/5/2007	1019.5602	1020.03	-0.046	0.046	0.5803	0.580892	-0.102	0.102	
12/6/2007	1018.6897	1019.26	-0.056	0.056	0.5805	0.580422	0.013	0.013	
12/7/2007	1020.4896	1020.26	0.023	0.023	0.5818	0.582007	-0.036	0.036	
12/8/2007	1020.8578	1020.61	0.024	0.024	0.5817	0.582264	-0.097	0.097	
12/9/2007	1022.0273	1022.04	-0.001	0.001	0.5821	0.582571	-0.081	0.081	
12/10/2007	1023.4182	1022.68	0.072	0.072	0.5821	0.582636	-0.092	0.092	
12/11/2007	1020.4479	1020.78	-0.033	0.033	0.5817	0.581827	-0.022	0.022	
12/12/2007	1021.4265	1021.02	0.04	0.04	0.5816	0.581604	-0.001	0.001	
12/13/2007	1022.506	1021.97	0.052	0.052	0.5817	0.582139	-0.075	0.075	
12/14/2007	1023.0214	1022.77	0.025	0.025	0.5827	0.582861	-0.028	0.028	
12/15/2007	1022.6501	1022.33	0.031	0.031	0.5826	0.582769	-0.029	0.029	
12/16/2007	1020.7595	1020.74	0.002	0.002	0.5818	0.582071	-0.047	0.047	
12/17/2007	1021.3925	1021.36	0.003	0.003	0.582	0.582163	-0.028	0.028	
12/18/2007	1020.4356	1020.86	-0.042	0.042	0.5823	0.582502	-0.035	0.035	
12/19/2007	1021.5064	1021.42	0.008	0.008	0.5828	0.58309	-0.05	0.05	
12/20/2007	1021.765	1021.97	-0.02	0.02	0.5825	0.583265	-0.131	0.131	
12/21/2007	1022.9254	1022.39	0.052	0.052	0.5831	0.583695	-0.102	0.102	
12/22/2007	1022.1897	1022.17	0.002	0.002	0.583	0.583486	-0.083	0.083	
12/23/2007	1023.1438	1022.6	0.053	0.053	0.5821	0.582778	-0.116	0.116	
12/24/2007	1022.2313	1021.86	0.036	0.036	0.5823	0.58296	-0.113	0.113	
12/25/2007	1023.4492	1022.66	0.077	0.077	0.5825	0.583068	-0.097	0.097	
12/26/2007	1021.3461	1021.42	-0.007	0.007	0.5821	0.58225	-0.026	0.026	
12/27/2007	1020.8944	1021.15	-0.025	0.025	0.5813	0.581714	-0.071	0.071	
12/28/2007	1023.3168	1022.95	0.036	0.036	0.5822	0.582856	-0.113	0.113	
12/29/2007	1023.3978	1022.87	0.052	0.052	0.5823	0.582866	-0.097	0.097	
12/30/2007	1022.612	1021.99	0.061	0.061	0.5822	0.582679	-0.082	0.082	
12/31/2007	1021.1448	1020.89	0.025	0.025	0.5821	0.582582	-0.083	0.083	
<b>Average % Difference</b>				<b>0.035</b>					<b>0.071</b>

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

Aglet	Department of the Army	Northern California Power Association
Agnews Developmental Center	Dept of General Services	Occidental Energy Marketing, Inc.
Alcantar & Kahl	Division of Business Advisory Services	OnGrid Solar
Ancillary Services Coalition	Douglas & Liddell	PPL EnergyPlus, LLC
Anderson & Poole	Douglass & Liddell	Pinnacle CNG Company
Arizona Public Service Company	Downey & Brand	Praxair
BART	Duke Energy	R. W. Beck & Associates
BP Energy Company	Duncan, Virgil E.	RCS, Inc.
Barkovich & Yap, Inc.	Dutcher, John	RMC Lonestar
Bartle Wells Associates	Ellison Schneider & Harris LLP	Recon Research
Blue Ridge Gas	Energy Management Services, LLC	SCD Energy Solutions
Braun & Associates	FPL Energy Project Management, Inc.	SCE
C & H Sugar Co.	Foster Farms	SESCO
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CAISO	Franciscan Mobilehome	SPURR
CLECA Law Office	G. A. Krause & Assoc.	Santa Fe Jets
CSC Energy Services	GLJ Publications	Seattle City Light
	Goodin, MacBride, Squeri, Schlotz & Ritchie	Sempra Utilities
California Cotton Ginners & Growers Assn	Green Power Institute	Sequoia Union HS Dist
California Energy Commission	Hanna & Morton	Sierra Pacific Power Company
California League of Food Processors	Heeg, Peggy A.	Silicon Valley Power
California Public Utilities Commission	Hitachi	Smurfit Stone Container Corp
Calpine	Hogan Manufacturing, Inc.	Southern California Edison Company
Cameron McKenna	Imperial Irrigation District	St. Paul Assoc.
Cardinal Cogen	Innercite	Sunshine Design
Casner, Steve	International Power Technology	Sutherland, Asbill & Brennan
Cerox	Intestate Gas Services, Inc.	TFS Energy
Chamberlain, Eric	J. R. Wood, Inc.	Tabors Caramanis & Associates
Chevron Company	JTM, Inc.	Tecogen, Inc.
Chris, King	Los Angeles Dept of Water & Power	Tioga Energy
City of Glendale	Luce, Forward, Hamilton & Scripps LLP	TransCanada
City of Palo Alto	MBMC, Inc.	Turlock Irrigation District
City of San Jose	MRW & Associates	U S Borax, Inc.
Clean Energy Fuels	Manatt Phelps Phillips	United Cogen
Coast Economic Consulting	Matthew V. Brady & Associates	Utility Cost Management
Commerce Energy	McKenzie & Associates	Utility Resource Network
Commercial Energy	Meek, Daniel W.	Utility Specialists
Constellation	Merced Irrigation District	Vandenberg Air Force
Constellation New Energy	Mirant	Verizon
Consumer Federation of California	Modesto Irrigation District	Wellhead Electric Company
Crossborder Energy	Morgan Stanley	Western Manufactured Housing Communities Association (WMA)
		White & Case
Davis Wright Tremaine LLP	Morrison & Foerster	eMeter Corporation
Day Carter Murphy	New United Motor Mfg., Inc.	
Defense Energy Support Center	Norris & Wong Associates	
Department of Water Resources	North Coast SolarResources	