STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 21, 2010

Re: Advice Letter 3153-G

Jane K. Yura
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, CA 94177

SUMMARY

The Energy Division of the California Public Utilities Commission (CPUC) approves the request of Pacific Gas and Electric Company (PG&E) in Advice Letter ("AL") 3153-G, to enter into long-term contract extensions for Canadian pipeline capacity through October 31, 2016 and October 31, 2020 with NOVA Gas Transmission Ltd. (NGTL) as described within the AL. The Energy Division also approves PG&E's <u>alternate</u> request to extend the pipeline capacity contract with Foothills Pipe Lines Ltd. (Foothills) for one year. These approvals are effective October 21, 2010.

As discussed in more detail below, AL 3153-G was protested by some parties. When the Energy Division approves a protested advice letter, Rule 7.6.1 of General Order 96-B requires the Energy Division to state the basis for rejecting the protest in its disposition letter. The Energy Division is partially rejecting the protest submitted, and provides the basis for doing so below.

PG&E'S REQUEST

On September 24, 2010, PG&E filed AL 3153-G primarily requesting CPUC approval for entering into long-term contract extensions for Canadian natural gas pipeline capacity with NGTL and Foothills. PG&E also made an alternate request that, if the long-term contracts were not approved, the Commission approve a one-year contract extension with both pipelines.

PG&E imports natural gas from Canada via several pipelines: NOVA Gas Transmission Ltd. ("NGTL"), Foothills Pipe Lines Ltd. ("Foothills"), and Gas Transmission Northwest ("GTN"). Gas flows from Canadian gas fields to NGTL to Foothills in Canada into GTN's system in the Pacific Northwest, down to PG&E's interconnection at the California-Oregon border. PG&E has an existing contract with NGTL lasting until November 2011. PG&E also currently holds concurrent Foothills capacity, and PG&E is committed to a large amount of long-term GTN capacity.

PG&E stated that pipeline capacity to Canadian gas fields is important for many reasons: providing firm access to a major gas supplier (Canada), compliance with D.04-09-022's minimum interstate capacity requirements, geographic diversification of gas supplies, matching downstream contracts with GTN, and locking in $18 million of savings now to core gas customers.

On August 12, 2010, the Canadian regulators of NGTL approved term-differentiated rates whereby longer-term contracts may be priced at a reduced rate relative to shorter-term reservation rates; NGTL offered these reductions in their tariffs. In AL 3153-G, PG&E's primary request is for CPUC approval to enter into long-term contract extensions with NGTL and Foothills in order to take advantage of such term-differentiated NGTL rates. PG&E estimates cost savings of $16 million compared to existing short-term NGTL tariff rates, over the duration of the contract extension, in addition to another $2 million in savings if PG&E notifies NGTL of such a contract extension by October 31, 2010.

Unlike the NGTL contracts, the Foothills contract rate is not reduced, but PG&E needs matching capacity on Foothills in order to move gas from NGTL onto the GTN system in the Pacific Northwest, where PG&E already holds capacity.

In other words, PG&E wants to lock in the NGTL reduced rate now rather than renew each year without a reduced rate, and PG&E also wants to lock in Foothills capacity to ensure uninterrupted gas flow from Canadian gas fields to PG&E's pipeline system.

Should CPUC reject PG&E's primary request in the AL, the in the alternative, PG&E requests CPUC approval of one-year extensions of the Canadian contracts to ensure uninterrupted access to Canadian gas supplies.

PROTEST

On October 4, 2010, ABAG Publicly Owned Energy Resources, Commercial Energy, School Project for Utility Rate Reduction, Spark Energy, and Tiger Natural Gas (collectively, "Protestors" or "the Protestors") filed a joint protest to AL 3153-G. The Protestors argue that the AL filing requests relief that requires consideration in a formal hearing or is otherwise inappropriate for the AL process. The Protestors also assert that the AL filing requests rates that would be unjust, unreasonable, or discriminatory.

Protesters protested on the following grounds:

1. The AL filing requests relief that requires consideration in a formal hearing or is otherwise inappropriate for the AL process.

Protestors argue that PG&E has arbitrarily decided that the NGTL and Foothills contract extensions are appropriate, without considering countervailing costs and risks. Protestors speculate that rates for NGTL and Foothills may fall. Protestors argue that PG&E may have interests contrary to core customers in holding excess capacity, profiting from holding excess and uneconomical capacity because they can broker the excess and/or uneconomical capacity and increase their Core Procurement Incentive Mechanism (CPIM) award or reduce CPIM risk exposure.

2. The AL filing requests rates that would be unjust, unreasonable, or discriminatory.

Protesters argue that they should have some say in PG&E's capacity contracting activities because the Protestors bear part of the costs of those contracts:

Protestors (who are Core Transport Agents, or CTAs) argue that under the pending Gas Accord V settlement under consideration by the CPUC in Application (A.) 09-09-013, settling parties agreed to a transition period after which CTAs and their customers will have cost responsibility for their pro-rata share of pipeline capacity obtained by PG&E for the core, even if a CTA rejects the capacity and it is brokered away.

Protestors also argue that even if the settlement is not approved by the CPUC, existing tariffs (PG&E Schedule G-CT) will cause CTAs to become responsible for their proportional share of pipeline capacity on April 1, 2012.

Protestors assert that because they face some of the costs of the pipeline capacity associated with PG&E's request, it would be unjust, unreasonable, and discriminatory for the Commission to authorize PG&E to make capacity buying decisions without input from CTAs.

Protestors request rejection of AL 3153-G in favor of one-year contract extensions for the Canadian pipeline capacity contracts (the PG&E Alternate Recommendations).

In the alternative, Protestors request approval of the larger NGTL contract but a modified approval of the smaller contract, such that it is extended through 2015, with the presumption that PG&E may negotiate a similar extension and rate reduction by October 2014. Protestors reject any extension of Foothills beyond one year, arguing that they have annual renewal rights that should be evaluated each year for economic viability.

PG&E RESPONSE TO PROTEST

On October 11, 2010 PG&E responded to the Protestors. A summary of the comprehensive response is as follows:

1. PG&E's requested pipeline capacity contracts do not exceed mandatory minimum pipeline capacity requirements (under D.04-09-022), therefore the Protestor's argument regarding excess capacity has no merit. Furthermore, the contract extensions merely match up to existing commitments on the downstream GTN system. If PG&E lacks firm capacity on any part of the NGTL-Foothills-GTN path, then the entire path's firm capacity is compromised.

2. DRA and TURN represent core procurement ratepayer interests. Thus the interests of PG&E's core procurement customers were already taken into account by the time PG&E filed AL 3153-G with the assent of DRA and TURN.

3. Revenue associated with capacity releases offsets core gas costs, and although PG&E receives monetary incentives under CPIM, core gas customers receive the overwhelming majority of any savings generated by capacity releases.

4. Pipeline reservation rates may change over time, for higher or lower. Reduced rates in exchange for longer-term commitments are not unusual and may reasonably balance cost savings with the risk of overpaying for pipeline capacity by locking in at too high of a rate. As an example, PG&E points to its long-term contracts with Ruby Pipeline that secured reductions and thus savings for core customers.

5. PG&E looked at alternatives to extending the Canadian contracts at issue in the AL. PG&E argues that Canada is and will remain a major gas supplier to California for many years to come, citing resurgent Canadian gas production being connected to the NGTL pipeline system and Alberta's large and robust liquid natural gas trading hub (AECO).

6. PG&E argues that extension of Foothills contracts is proposed under PG&E's business judgment after consultation with DRA/TURN and would not preclude similar rate reductions in the future, stating that NGTL offered the recently-approved long-term differentiated rates to shippers that already had long-term contracts on the NGTL-Foothills-GTN route such as PG&E. Therefore, in the event any similar reductions on Foothills are offered in the future, PG&E expects to be eligible for such reductions regardless of long-term commitments made now.

DRA/TURN JOINT RESPONSE TO PROTEST

On October 11, the Division of Ratepayer Advocates ("DRA") and The Utility Reform Network ("TURN") jointly filed a response to the Protestors, a summary of which follows:

1. DRA/TURN support PG&E's request in AL 3153-G.

2. D.04-09-022 requires PG&E to hold minimum firm natural gas pipeline capacity contracts each year. The most logical and rational solution is to secure this capacity on a long-term basis at discounted rates, rather than recurring one-year terms with no discounts. Such discounts benefit all core customers—including CTAs who would be entitled to share in the savings if they chose to avail themselves of the capacity.

3. Holding long-term firm Canadian pipeline capacity would help PG&E diversify its portfolio of natural gas supplies. (Although unstated, the diversification of natural gas supplies reduces possible overreliance on any particular basin, should gas production or transportation to California be disrupted for any reason.) PG&E's request in AL 3153-G is reasonable in providing better long-term value and diversification of natural gas supplies than simple undiscounted one-year renewals that the Protestors request in their protest.

ENERGY DIVISION DISPOSITION DISCUSSION

The Energy Division approves PG&E's primary request in Advice Letter ("AL") 3153-G as filed, for long-term contract extensions for NGTL pipeline capacity. Specifically, the Energy Division approves PG&E's request to enter into two long-term pipeline capacity contract extensions on NGTL through October 31, 2016 and October 31, 2020 as described within the AL.

The Energy Division also approves a one-year contract extension on Foothills.

Under CPUC General Order 96-B ("GO 96-B") Rule 7.6.1, the Energy Division may approve a protested advice letter that is subject to disposition under Rule 7.6.1 and is otherwise proper, and reject the protest if the protest:

1) is not made on the proper grounds as set forth in General Rule 7.4.2,
2) may be rejected on a technical basis as discussed in General Rule 7.6.1, or
3) is clearly erroneous.

The Energy Division partly rejects the protest under GO 96-B, Rule 7.6.1 on two bases:

First, the protest to AL 3153-G was not made on proper grounds as defined in GO-96-B, Rule 7.4.2. PG&E's AL was submitted in compliance within the expedited AL process provided by CPUC Decision (D.) 04-09-022 (p.26-28), and thus the relief requested by PG&E is properly within the bounds of an AL rather than an application. In addition, PG&E's request with regard to long-term NGTL contracts is not unjust, unreasonable, or discriminatory. Simply because the Protestors may be impacted by the costs incurred under the contracts does not mean that Commission approval of the contracts would be unjust, unreasonable and discriminatory without input from the Protestors. Any provisions established under PG&E Schedule G-CT that could potentially impact the Protestors have already been adopted by the Commission and Protestors should have been aware of them at the time. That PG&E has come forward with proposed contracts in compliance with the requirements and procedures outlined in D.04-09-022 does not now mean that approval of the contracts would be unjust, unreasonable and discriminatory. In any case, the NGTL contracts for which PG&E seeks approval should not only benefit bundled core gas customers, the Energy Division believes that the contracts should be beneficial for core transport agents as well.

Second, the protest is rejected on a technical basis. Certain issues raised in the protest are not ripe for review because a Settlement referenced by Protestors as partly providing a basis for their protest has not yet been adopted by the Commission, nor have damages occurred as a result of PG&E's Schedule G-CT.

Furthermore, the Energy Division disagrees with the protest regarding the NGTL long-term contracts even if the protest were procedurally correct. PG&E's request in AL 3153-G regarding the NGTL long-term contracts is reasonable; so are the responses to the protest filed by PG&E and DRA/TURN. Energy Division is satisfied with PG&E, DRA, and TURN's justification for locking in lower rates now on NGTL rather than waiting for speculative savings as proposed by the Protestors.

Essentially, the Protestors speculate that annual renewals may save core ratepayers money if rates go down over the next several years (enough to more than offset the projected $18 million in cost savings should PG&E lock in long-term rates as requested in its AL), but the protest does not acknowledge the risk that NGTL rates may go *up* rather than *down*. Nor does the protest adequately acknowledge that the potential savings from locking in lower rates today benefits core ratepayers and the Protestors, and that having firm capacity contracts to Canada helps ensure a diverse gas supply portfolio for PG&E. Regarding the Protestors' allegations of overcapacity, PG&E, DRA, and TURN rightly note that PG&E has mandatory minimum firm capacity requirements as outlined in D.04-09-022. For these and the other reasons PG&E and DRA/TURN stated in their response to the protest, the protest regarding NGTL would be at least partially rejected even if it were procedurally correct.

However, the Energy Division partly agrees with the Protestors regarding the Foothills contract extensions. Under the Foothills contract extension, PG&E would pay the maximum tariff rate for the entire term of the contract. The Energy Division does not see how PG&E adequately benefits from entering into a long-term contract in which PG&E would simply pay the maximum tariff rate. Instead, PG&E could simply extend the contract on a yearly basis and wait to see if rates fall or if discounts are offered. PG&E says it expects that term-differentiated rate reductions could be offered to PG&E on Foothills even if PG&E were under a long-term contract, but the Energy Division has no written assurance of such conditions.

Currently, under the expedited AL process adopted in D.04-09-022, DRA, TURN, and the Energy Division safeguard the interests of core customers. If the Protestors are unsatisfied with the process established in D.04-09-022, then the Protestors need to file a petition to modify the decision, not a protest to advice letters such as AL 3153-G.

Sincerely,

Julie A. Fitch

Julie A. Fitch, Director
Energy Division

cc:
PG&E
Jane K. Yura: PGETariffs@pge.com
Olivia Brown: oxb4@pge.com
John Armato: JPA3@pge.com

Protestors
Gerald Lahr, ABAG: jerryl@abag.ca.gov
Michael Rochman, SPURR: service@spurr.org
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Pacific Gas and Electric Company®

Jane K. Yura
Vice President
Regulation and Rates

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September 24, 2010

Advice 3153-G
(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Expedited Pre-Approval of Canadian Pipeline Contracts

Pacific Gas and Electric Company (PG&E) respectfully requests the California Public Utilities Commission (Commission) to pre-approve the continuation of four existing natural gas pipeline contracts to transport natural gas supplies from Canada for PG&E's core gas customers. Continuation of these contracts will ensure uninterrupted access by PG&E's Core Gas Supply Department to Canadian natural gas supplies.

Purpose

The purpose of this expedited advice letter is to request approval to renew the existing transportation arrangements described below.[1] In Decision (D.) 04-09-022, the Commission established procedures for expedited regulatory approval and processing of utility commitments to pipeline capacity. These procedures require consultation between PG&E, the Division of Ratepayer Advocates (DRA) and The Utility Reform Network (TURN). PG&E has consulted with DRA and TURN and both have confirmed their support for PG&E's renewal of the subject pipeline contracts.

Under D.04-09-022, contracts for pipeline capacity may be submitted by expedited advice letter, seeking Commission approval within 21 days of the advice letter filing date. PG&E requests that the Commission approve this filing by **October 15, 2010**.

Description of Contracts

PG&E purchases significant quantities of natural gas from Canada's Western Sedimentary Basin to serve its core gas customers. PG&E holds Canadian and U.S. interstate pipeline capacity to transport those gas supplies to PG&E's interconnection at the California-Oregon border. PG&E has purchased and transported Canadian gas supplies to California since 1961. The northern pipeline capacity path includes transmission capacity on the following TransCanada pipelines:

[1] The subject contracts will be provided to the Energy Division and DRA under Public Utilities Code Section 583. Other applicable terms and conditions are contained within pipeline tariffs and are available directly from the pipelines.

- NOVA Gas Transmission Ltd. (NGTL), within the province of Alberta;
- Foothills Pipe Lines Ltd. (Foothills), through the province of British Columbia; and
- Gas Transmission Northwest (GTN), through Idaho, Washington and Oregon to the California border.

Recommendation

The table below describes the specific contracts that PG&E seeks Commission approval to renew:

Table 1 – Summary of Proposed Pipeline Contract Extensions

Pipeline	Quantity (Gigajoules per day)[2]	Monthly Tariff Rate (US $/GJ)[3]	Discount off Tariff Rate	Maximum Contract Extension Term	Maximum Notional Values[4] (*US $ Million*)
Foothills Pipe Lines	300,490	$2.31	N/A[5]	Contract 1: Nov. 1, 2011 to Oct. 31, 2016	34.8
	85,865	$2.31	N/A[5]	Contract 2: Nov. 1, 2011 to Oct. 31, 2020	15.7
Nova Gas Transmission	303,587	$5.79	10%[6]	Contract 1: Nov. 1, 2011 to Oct. 31, 2016	79.3
	86,750	$5.79	10%[6]	Contract 2: Nov. 1, 2011 to Oct. 31, 2020	35.7
Total					**165.5**

On August 12, 2010, Canada's National Energy Board (NEB) approved NGTL's proposal to offer term-differentiated rates, whereby shippers receive discounted pipeline reservation rates for longer term commitments.[6] Extending PG&E's existing contracts on NGTL, as proposed, will allow PG&E to secure maximum reservation charge discounts for the benefit of core gas customers. Savings of approximately $16 million, compared to existing NGTL tariff rates, are potentially achievable through the duration of PG&E's proposed contract extensions.[7] In

[2] One gigajoule (GJ) = 0.9478 decatherms (Dth)
[3] Tariff rates are published in Canadian dollars and have been converted to US dollars based on the exchange rate from Bank of Canada Noon Rate of 0.9653 for September 8, 2010.
[4] Maximum Notional Values are calculated on a net present value basis using a discount rate of 7.6 percent and based on each pipeline's existing reservation rate and the exchange rate from Bank of Canada Noon Rate identified above.
[5] Discounts are not offered by Foothills Pipe Lines.
[6] NGTL's Rate Design and Services Settlement, endorsed by PG&E, provides the opportunity to secure term-differentiated discount rates, offered to export shippers extending their contracts for three years or more. Contracts renewed for a term of five years or greater will receive the maximum 10% discount from the one-year rate.
[7] Estimated NGTL savings calculation: Quantity (for each contract) x $5.79 (monthly tariff rate) x contract duration (months) x 10% discount = $15,971,263.

addition, NGTL has stated that the discounts will be applicable to remaining durations of existing contracts, provided NGTL receives notification of contract term extension by October 31, 2010. By providing such notice, PG&E will begin receiving the maximum discount as early as November 1, 2010, applicable to the one year remaining on its existing NGTL contracts. Thus, providing notification by October 31, 2010, increases the potential savings to over $18 million.[8]

PG&E also proposes to extend the Foothills contracts to align both NGTL and Foothills to match PG&E's existing downstream commitments on GTN, providing a contiguous pipeline path to Canadian gas supplies. Without approval to renew the existing NGTL and Foothills contracts, PG&E's firm northern pipeline path would reach only to Kingsgate (at the U.S.-Canada border), stopping short of the Alberta supply basin.

PG&E has consulted with DRA and TURN, and both support PG&E's proposed renewals with both NGTL and Foothills as summarized in Table 1.

The requested contract extensions will provide the following:

1. Firm Access to Natural Gas Supplies: Provides uninterrupted access to competitively-priced Canadian gas supplies;

2. CPUC Compliance: Allows PG&E to maintain compliance with the Commission's minimum pipeline capacity quantity requirements to ensure reliable, long-term supplies of natural gas to California, established in D.04-09-022[9];

3. Geographic Diversification: Maintains PG&E's existing access to multiple gas sources (Alberta and the Western U.S. basins). A diversified portfolio reduces gas customer exposure to large swings in gas prices in a particular supply basin;

4. Match Downstream Contracts: Matches the term lengths of the upstream Canadian contracts with existing downstream contract commitments on Gas Transmission Northwest (GTN); and

5. Secure Maximum Discounts and Cost Savings: Provides cost savings to PG&E's core gas customers by taking advantage of NGTL's term differentiated discounts. The customer cost savings are estimated to be approximately $18 million.

[8] If PG&E does not extend the existing NGTL contracts by October 31, 2010, and decides to do so at a later date, then the earliest possible date to receive a discount is November 1, 2012.

[9] Order Instituting Rulemaking to Establish Policies and Rules to Ensure Reliable, Long-Term Supplies of Natural Gas to California (Gas Capacity OIR).

Alternate Recommendation

If the Commission elects not to approve the recommended extension of the contracts for the proposed five and nine year periods, PG&E requests approval to extend the contracts for the one-year minimum period allowed for under the pipelines' tariffs, to ensure continued, uninterrupted access to Canadian gas supplies.

All costs associated with the contracts will continue to be recovered from PG&E's core gas customers, in accordance with the interstate pipeline capacity contract procedures established in D.04-09-022, through PG&E's Core Pipeline Demand Charge Account, and PG&E's gas tariffs.

This filing will not affect any other rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule.

Protests – Ten Day Expedited Period

Anyone wishing to protest this filing may do so by sending a letter to the address below by **October 4, 2010**, which is ten (10) days from the date of this filing, in accordance with the expedited protest period authorized in D.04-09-022.

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 and mas@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:

Jane K. Yura
Vice President, Regulation and Rates
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
E-mail: PGETariffs@pge.com

Effective Date

In accordance with the comment and evaluation period provided in D.04-09-022, and assuming no protests are received to this filing, PG&E requests Commission approval of this filing effective **October 15, 2010**, which is 21 days after the date of this 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 service list for R.04-01-025. Address changes to the General Order 96-B service list should be directed to email 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**.

Jane Yura – OB

Vice President, Regulation and Rates

cc: Richard A. Myers - Energy Division
Franz Cheng - Energy Division
Belinda Gatti - Energy Division
Jonathon Bromson - Legal Division
Mark Pocta - Division of Ratepayer Advocates
Ramesh Ramchandani - Division of Ratepayer Advocates
Pearlie Sabino - Division of Ratepayer Advocates
Mike Florio - The Utility Reform Network
Marcel Hawiger - The Utility Reform Network
Service list for R.04-01-025

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:	Contact Person: Olivia Brown
☒ ELC ☒ GAS	Phone #: 415.973.9312
☐ PLC ☐ HEAT ☐ WATER	E-mail: oxb4@pge.com

EXPLANATION OF UTILITY TYPE			(Date Filed/ Received Stamp by CPUC)
ELC = Electric	GAS = Gas	☐	
PLC = Pipeline	HEAT = Heat	WATER = Water	

Advice Letter (AL) #: 3153-G **Tier:** 2

Subject of AL: Expedited Pre-Approval of Interstate and Canadian Pipeline Contracts

Keywords (choose from CPUC listing): Contracts, Agreements

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other ______________________________

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.04-09-022

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: N/A

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: N/A

Resolution Required? ☐ Yes ☒No

Requested effective date: October 15, 2010 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). N/A

Tariff schedules affected: N/A

Service affected and changes proposed: N/A

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
jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Jane K. Yura, Vice President, Regulation and Rates
77 Beale Street, Mail Code B10B
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

Aglet
Alcantar & Kahl
Ameresco
Anderson & Poole
Arizona Public Service Company
BART
BP Energy Company
Barkovich & Yap, Inc.
Bartle Wells Associates
Bloomberg New Energy Finance
Boston Properties
Brookfield Renewable Power
C & H Sugar Co.
CA Bldg Industry Association
CAISO
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California League of Food Processors
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Cameron McKenna
Casner, Steve
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City of Palo Alto
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Coast Economic Consulting
Commerce Energy
Commercial Energy
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Division of Business Advisory Services
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Downey & Brand
Duke Energy
Dutcher, John
Economic Sciences Corporation
Ellison Schneider & Harris LLP
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G. A. Krause & Assoc.
GLJ Publications
Goodin, MacBride, Squeri, Schlotz & Ritchie
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Hanna & Morton
International Power Technology
Intestate Gas Services, Inc.
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Los Angeles Dept of Water & Power
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MBMC, Inc.
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Manatt Phelps Phillips
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Merced Irrigation District
Mirant
Modesto Irrigation District
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OnGrid Solar
Praxair
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RCS, Inc.
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Recurrent Energy
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SMUD
SPURR
San Francisco Public Utilities Commission
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Sierra Pacific Power Company
Silicon Valley Power
Silo Energy LLC
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Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tecogen, Inc.
Tiger Natural Gas, Inc.
Tioga Energy
TransCanada
Turlock Irrigation District
U S Borax, Inc.
United Cogen
Utility Cost Management
Utility Specialists
Verizon
Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)
eMeter Corporation