STATE OF CALIFORNIA

Edmund G. Brown Jr., *Governor*

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

December 28, 2012

**Advice 3304-G/4052-E,
Supplemental Advice Letters
3304-G-A/4052-E-A, and
3304-G-B/4052-E-B**

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

Subject: Revised Customer Energy Statement (RCES) Formats in Compliance with Decision 12-03-015

Dear Mr. Cherry:

PG&E Advice Letter 3304-G/4052-E, and Supplemental Advice Letters 3304-G-A/4052-E-A, and 3304-G-B/4052-E-B are approved and effective August 30, 2012. The Protest of DRA is dismissed on technical grounds in accordance with General Order 96-B, Section 7.6.1.

PG&E filed PG&E Advice Letter 3304-G/4052-E on June 1, 2012. The advice letter was protested by DRA on June 20, 2012. PG&E filed a reply to the protest on June 28, 2012. On June 30, 2012, the Energy Division suspended PG&E Advice Letter 3304-G/4052-E to allow further review. Subsequently, PG&E agreed in writing to extend the suspension period until December 30, 2012. PG&E filed Supplemental Advice Letters 3304-G-A/4052-E-A, and 3304-G-B/4052-E-B on November 30, 2012, and December 14, 2012 respectively.

Energy Division Requested Changes to the RCES

PG&E and the Energy Division met and conferred over email and phone several times during the suspension period to discuss changes to the Revised Customer Energy Statement (RCES) requested by Energy Division. The two supplemental advice letters filed by PG&E address the issues of concern to the Energy Division. Details of the changes made in conformance with Energy Division review are found on pages 2-4 of Supplemental Advice Letter 3304-G-A/4052-E-A and on pages 1-2 of Supplemental Advice Letter 3304-G-B/4052-E-B.

Additional PG&E Proposed Changes to the RCES

PG&E made other changes to the RCES on its own initiative that Energy Division now approves. Details of these changes are found on pages 4-6 of Supplemental Advice Letter 3304-G-A/4052-E-A. The Energy Division approves these changes including:

<u>Revised Energy Statement Format 18 for Direct Access (DA), Community Choice Aggregation (CCA) and gas Core Transport Agent (CTA) customers.</u>

For DA, CCA and CTA Energy Statements, PG&E is proposing to revise the Details of Electric and Gas Delivery Charges to present the bill at the bundled delivery rate and explicitly subtract the electric generation or gas procurement charges (shown as a "generation credit" in the case of the electric bill) to arrive at the total PG&E delivery charges[1]. PG&E has affirmed that DA/CCA customers prefer this presentation through quantitative research[2]. PG&E believes this presentation makes clear that the customer is not being double-charged for electric generation or gas procurement by PG&E and his/her third-party supplier as the PG&E generation/gas procurement charge is identified as being subtracted out of the PG&E portion of the bill.

The revised Details of Electric Delivery Charges include the line items in the following sample:

07/01/2012 - 07/09/2012 Your Tier Usage | 1 | 2 | 3 | 4 |

Tier 1 Allowance	99.00	kWh	(9 days x 11.0 kWh/day)		
Tier 1 Usage	99.000000	kWh	@	$ 0.12845	$ 12.72
Tier 2 Usage	29.700000	kWh	@	$ 0.14602	4.34
Tier 3 Usage	69.300000	kWh	@	$ 0.29561	20.49
Tier 4 Usage	213.750000	kWh	@	$ 0.33561	71.74
Generation Credit					- 29.14
Power Charge Indifference Adjustment					2.71
Cost Responsibility Surcharge Exemption					0.00
Franchise Fee Surcharge					0.21
Total Electric Delivery Charges					**$83.07**

2009 Vintaged Power Charge Indifference Adjustment

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[1] The originally filed format used a delivery rate unbundled from electric generation or gas procurement. (PG&E Advice 3304-G/4052-E file June 1, 2012)

[2] See email dated September 27, 2012 from Sid Dietz of PG&E to CPUC Energy Division Director Ed Randolph stating that MEA had agreed to the new proposed bill presentment for CCA customers. See also email dated September 18, 2012 from Sid Dietz of PG&E to CPUC Energy Division Director Ed Randolph in which PG&E shared the quantitative research results comparing customer reaction to the two bill presentments. The research results confirm that CCA/DA customers prefer the bill format that shows the bundled delivery rate followed by a line item generation credit.

Withdrawal of Format 9 for Low Vision Customers

PG&E wishes to withdraw format 9, which presented a Low Vision format that excludes certain information in order to present more information in large font. The Low Vision format would have been available for customers on E1 and/or G1 rate schedules. Only low vision customers on other rate schedules or enrolled in payment programs such as Balanced Payment Plans would have received enlarged copies of their full energy statements[3]. After discussion with the Center for Accessible Technology, PG&E has agreed that all customers requesting Low Vision format will receive enlarged copies of their full energy statements[4].

Protest of DRA

In DRA's protest to Advice Letter 3304-G/4052-E, DRA argues that PG&E should display the actual CARE gas and electric rates in the Details of Charges sections of the energy statements sent to CARE customers rather than PG&E's proposal to display the non-CARE gas and electric rates and the CARE discount as line item discounts to bill calculation in the Details of Charges.

DRA asserts that PG&E's proposed presentation of the non-CARE rate in the Details of Charges "makes it significantly more difficult for low-income and price sensitive customers to determine their per-unit charges, and thus use their bills as a meaningful tool to control energy costs." (Protest page 1) DRA argues that PG&E's bill format "will be misleading and unnecessarily alarming for low-income customers." (Protest page 2)

Reply of PG&E

In their reply to DRA's protest PG&E notes that the actual per-unit CARE rates are displayed in the bill message section directly to the right of the Details of Charges making it possible for the customer to compare the CARE and non-CARE rates. In addition the RCES provides customers with a graph of their daily usage during the billing period, and a visual representation of their tier as well as a definition of the Tier 1 (baseline) allowance. Therefore, PG&E believes the combination of the CARE-specific presentment and other general improvements to all RCES formats support the ability of residential CARE customers to control their energy costs. PG&E also cites customer research it conducted on the presentment of CARE energy statements with CARE customers to support its design of the RCES and states that DRA has not offered customer research or survey data to support its position. (Reply page 2)

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[3] See footnote 2 on page 3 of the original Advice Letter.

[4] PG&E performed customer research on the standard and Low Vision energy statements with low vision customers in January 2012. The research found that both more moderately and extremely impaired respondents prefer the standard prototype bill to the low-vision version.

Energy Division Disposition of the Protest

The Energy Division finds that customers would be better served by the CARE presentment proposed by PG&E rather than the format favored by DRA. The PG&E format better informs CARE customers by enabling them to understand what their actual per-unit CARE rate is, what CARE discount they receive, and what the non-CARE rate would be if they were not in the CARE program. An additional benefit of showing the non-CARE rate is that customers can easily see the consequence of failing to renew their CARE status by the date shown above the bill calculation—both in terms of the discount amount that would be lost and the higher non-CARE rates that would apply. This is particularly true for CARE customers whose electric Tier 4 usage is being billed at a Tier 3 CARE rate. DRA's proposed presentation would not provide CARE customers in Tier 4 with the Tier 4 usage needed to calculate their savings. Therefore, presenting the non-CARE rate is neither "irrelevant" nor misleading as DRA asserts. (Protest page 1, and 2) The protest of DRA is dismissed on technical grounds.

Sincerely,

Edward Randolph
Director, Energy Division
California Public Utilities Commission

Pacific Gas and Electric Company

Brian K. Cherry
Vice President
Regulatory Relations

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

Fax: 415.973.7226

December 14, 2012

Advice 3304-G-B/4052-E-B
(Pacific Gas and Electric Company ID U 39 /M)

Public Utilities Commission of the State of California

Subject: **Supplemental: Revised Customer Energy Statement (RCES) Formats in Compliance with Decision 12-03-015**

This supplemental advice letter is being submitted to clarify and expand on Advice 3304-G-A/4052-E-A which Pacific Gas and Electric Company (PG&E) submitted on November 30, 2012. While revised Attachment 1 filed in Advice 3304-G-A/4052-E-A and Attachment 4 filed in Advice 3304-G/4052-E are not being replaced, the production of Energy Statements presented therein will conform to the changes described below.

Purpose

On November 30, 2012, PG&E filed a supplemental Advice Letter 3304-G-A/4052-E-A to supplement original Advice Letter 3304-G/4052-E, filed on June 1, 2012. PG&E filed for approval of its revised customer energy statement forms in accordance with Ordering Paragraph (OP) 5 of Decision (D.) 12-03-015 Phase 3 of General Rate Case (GRC) A.10-03-014. The Advice Letter also followed the guidance provided by the California Public Utilities Commission (CPUC or Commission) in OP 10 of D.07-07-047.

This supplemental advice letter is being submitted to clarify and expand on the prior Supplemental Advice Letter 3304-G-A/4052-E-A in conformance with the review by the Energy Division of the CPUC.

Bill Messages

California Alternative Rates for Energy (CARE) Rates

PG&E wishes to clarify that the CARE Rates message will be the first message displayed every month if there is more than one message on Page 3 & 4 of the CARE Format (See Format 2). The CARE Rates message will be located on the right hand side of the page above any other bill messages which may appear under “Additional Messages”.

Non-residential Time-of-Use (TOU)

PG&E will implement a new bill message for non-residential customers on TOU schedules. The message will be displayed at least annually. The message will state:

- The customer is on a TOU rate schedule,
- The TOU rate charges a higher rate for electric usage on summer weekday afternoons,
- To save money, conserve energy as much as possible during those summer peak hours.

As shown in Attachment 4, the TOU periods are presented every month in the lower right hand corner of the Details of Electric Charges page.

Graphics

PG&E will endeavor to enlarge the font sizes in the graphs to improve readability to the extent possible within the same footprint. (See the sample graphs in revised Attachment 1 filed in Advice 3304-G-A/4052-E-A on November 30, 2012). The changes to the font size and readability of the graphs on all pages in Attachment 1 will apply to all energy statement formats, including all residential and commercial formats.

48 Hour Notice Envelopes

PG&E will pilot using different envelopes for 48 hour notices than are used for other correspondence. PG&E will monitor customer response to this new process.

Protests

Pursuant to General Order 96-B, Section 7.5.1, due to the limited nature of this Supplemental Advice Letter, PG&E is requesting the protest period not be reopened by the filing of this supplement.

Effective Date

PG&E requests that this supplemental Advice Letter 3304-G-B/4052-E-B be approved concurrent with approval of the original Advice Letter 3304-G/4052-E, and Supplemental Advice Letter 3304-G-A/4052-E-A, as supplemented herein, effective on **August 30, 2012**.

Notice

In accordance with General Order 96-B, Section IV, a copy of this supplemental advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.10-03-014 and A.06-06-026. Address changes to the General Order 96-B service list should be directed to PG&E at email address

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

Brian Cherry

Vice President, Regulatory Relations

cc: Service List A.10-03-014
Service List A.06-06-026
Melissa Kasnitz, Center for Accessible Technology
Lee Whei Tan, Division of Ratepayer Advocates
Stephanie Chen, The Greenlining Institute
Matthew Freedman, The Utility Reform Network
Elizabeth Rasmussen, Marin Energy Authority

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: Kimberly Chang
☑ ELC ☑ GAS	Phone #: (415) 972-5472
☐ PLC ☐ HEAT ☐ WATER	E-mail: kwcc@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) #: **3304-G-B/4052-E-B** **Tier:** 2

Subject of AL: **Supplemental: Revised Customer Energy Statement (RCES) Formats in Compliance with Decision 12-03-015**

Keywords (choose from CPUC listing): Compliance, Bilingual, Forms, Rules

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.12-03-015

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:

Confidential information will be made available to those who have executed a nondisclosure agreement: ☐ Yes ☐ No

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: **August 30, 2012** No. of tariff sheets: 0

Concurrent with Advice 3304-G/4052-E and Advice 3304-G-A/4052-E-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: N/A

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: 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:

California Public Utilities Commission
Energy Division
EDTariffUnit
505 Van Ness Ave., 4th Flr.
San Francisco, CA 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Brian Cherry
Vice President, Regulation and Rates
77 Beale Street, Mail Code B10C
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E-mail: PGETariffs@pge.com

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

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North Coast SolarResources
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Verizon
Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)
eMeter Corporation