

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



December 21, 2015

**Advice Letters: 3568-G/4594-E
3568-G-A/4594-E-A**

Pacific Gas and Electric Company
Attn: Erik Jacobson, Director, Regulatory Relations
Senior Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: Implementation of SmartMeter™ Opt Out Phase 2 Decision 14-12-078: Revise
the SmartMeter™ Opt-Out Program Balancing Accounts, Electric and Gas
Rate Schedules E-SOP and G-SOP, and Electric and Gas Rule 9**

Dear Mr. Jacobson:

Advice Letter 3568-G/4594-E and 3568-G-A/4594-E-A are effective as of January 15, 2015, per Resolution E-4723 Ordering Paragraphs.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Edward Randolph'.

Edward Randolph
Director, Energy Division

February 26, 2015

Advice 3568-G/4594-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Implementation of SmartMeter™ Opt Out Phase 2 Decision 14-12-078: Revise the SmartMeter™ Opt-Out Program Balancing Accounts, Electric and Gas Rate Schedules E-SOP and G-SOP, and Electric and Gas Rule 9

Purpose

In compliance with the *Decision Regarding SmartMeter Opt-Out Provisions*, Decision (D.) 14-12-078, Pacific Gas and Electric Company (PG&E) submits this Tier 1 advice letter for approval to revise its Electric and Gas Preliminary Statements for its SmartMeter™ Opt-Out Program (SOP) balancing accounts (SOPBAs), Electric and Gas Rate Schedules (E-SOP and G-SOP), and Electric and Gas Rule 9. The affected tariff sheets are listed in Attachment 1.

Background**SOP Phase 2:**

On December 18, 2014, the California Public Utilities Commission (CPUC or Commission) issued D.14-12-078, which “adopted fees and charges for residential customers in the service territories of PG&E, Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) who do not wish to have a wireless smart meter.”¹ This decision grants authority for PG&E to recover actual costs associated with providing the opt-out option up to \$35.344 million for 2012 and 2013.² In addition, this decision adopted a “recorded cost” approach to setting the revenue requirement for opt-out service that PG&E may recover as part of its next GRC.³ It requires, on a going forward basis, that PG&E “include a summary of costs incurred and revenues collected associated with

¹ D.14-12-078, p. 2. Also see Ordering Paragraph (OP) 2.

² Ibid. Also see OP 1.

³ Ibid. Also see OP 1.

providing the opt-out option, starting in its next available General Rate Case” that will “identify the portion of revenues collected from opt-out charges, the portion of revenue that was over or under collected, and subsequent allocation or refunds that will be made to the residential customer class.”⁴

In Ordering Paragraph (OP) 5 of D.14-12-078, the CPUC authorized PG&E to file a Tier 1 advice letter “to create electric and gas balancing accounts to record the amount of revenues collected from opt-out customers as compared to the recorded costs of opt-out service.”⁵ The CPUC directed PG&E to exclude from these balancing accounts the “revenue requirements for trips to unable-to-complete smart meter installations; and costs of hand-held meter reading devices in excess of 200 devices.”⁶

In OP 25, the CPUC directed PG&E, SCE, and SDG&E to “implement bi-monthly (every two months) meter reading bill plan[s] for customers who elect the smart meter opt-out option.”⁷

2014 GRC Phase I SOP Adopted Revenue Requirements:

On November 15, 2012, PG&E filed its 2014 GRC Phase I Application (A.) 12-11-009 that included forecasts of SOP expenses and revenues received from SOP customer fees based on the number of customers that PG&E had forecast to participate in the program. PG&E had noted in its proposal that the number of SOP participants was uncertain pending the outcome of Phase 2 of the SOP proceeding (A.11-03-014). In the absence of a Commission decision in the Phase 2 Opt-Out proceeding, PG&E proposed two-way balancing accounts to manage the uncertainty.

On August 14, 2014, the CPUC issued a final decision (D.14-08-032) in PG&E’s 2014 GRC Phase I application adopting SOP forecasts that are embedded in the 2014 GRC electric and gas base distribution revenue requirements. Those revenue requirements are included in Attachment 2. That decision also approved two-way balancing accounts to record the difference between the SOP’s actual net revenue requirement, (i.e., net of actual revenues derived from participating customers’ payment of CPUC-approved fees) and the updated SOP revenue requirements approved in D.14-08-032.

PG&E filed Advice Letter 3519-G/4504-E to establish the electric and gas SOP Balancing Accounts (SOPBAs) effective January 1, 2014.⁸ The Commission approved that advice letter on December 10, 2014.

⁴ Ibid.

⁵ Ibid, OP 5.

⁶ Ibid.

⁷ Ibid, OP 25.

⁸ Electric Preliminary Statement Part GK and Gas Preliminary Statement Part DF.

Summary of Revised SOP Cost Recovery

February 2012 (inception of the program) - December 31, 2013: Incremental SOP actual revenue requirements compared to revenues from SOP customer charges and fees have been recorded in the SOMAs pursuant to D.12-02-014. The ongoing capital revenue requirements associated with capital additions through December 31, 2013, recorded post-2013 also have been recorded in the SOMAs. The SOP Phase 2 decision, D.14-12-078, allows PG&E to transfer the amounts from the SOMAs to balancing accounts for disposition as part of PG&E's next GRC.⁹

2014: Effective January 1, 2014, the adopted SOP amounts were included in PG&E's GRC base distribution revenue requirements subject to true-up to actual expenses and net of opt-out fees from participating SOP customers through the SOPBAs. The SOPBAs contain the expense related revenue requirements for 2014, capital revenue requirements on capital additions in 2014, and fees collected in 2014. As part of PG&E's March 1, 2015, electric rate change advice letter,¹⁰ PG&E will transfer the December 31, 2014, balance in the electric SOPBA to the DRAM for true-up in electric distribution rates. Similarly, as part of PG&E's April 1, 2015, gas transportation rate change, PG&E will transfer the December 31, 2014, balance in the gas SOPBA to the Core Fixed Cost Account for true-up in gas transportation rates.^{11,12}

2015: The SOP Phase 2 decision, D.14-12-078, revises and supersedes the SOP cost recovery adopted in PG&E's 2014 GRC Phase 1 decision. PG&E will revert to a "recorded cost" approach for its SOP revenue requirements, pursuant to the SOP Phase 2 decision. Effective January 1, 2015, PG&E is revising the SOPBAs to record the expenses, capital revenue requirements based on actual capital additions, including the ongoing capital revenue requirements associated with capital additions from 2012-2014, net of opt-out customers fees and charges only. The forecast SOP revenue requirements adopted in the 2014 GRC Phase 1 decision, D.14-08-032, will no longer be recorded in the SOPBAs and will be removed from PG&E's base distribution revenue requirements. PG&E's revised base revenue requirements are included in Attachment 2. Removing the adopted SOP forecasts from PG&E's 2015 and 2016 base distribution revenue requirement causes an increase to the adopted base revenue

⁹ Page 2, D.14-12-078.

¹⁰ PG&E's Advice 4596-E to be submitted for filing on February 27, 2015.

¹¹ The currently effective SOPBA-E preliminary statement requires the balance be transferred to the Distribution Revenue Adjustment Mechanism (DRAM) for recovery. The currently effective SOPBA-G preliminary statement requires the balance be transferred to the Core Fixed Cost Account (CFCA) for recovery.

¹² In its Supplemental Annual Electric True-Up Advice Letter, Advice 4484-E-A, page 6, PG&E indicated that it was unable to include a forecasted SOPBA-E balance in rates due to the timing of that filing and the SOP Phase 2 decision that was approved on December 18, 2014. At that time, PG&E was still analyzing the impact of the SOP Phase 2 decision to determine the amounts to be transferred to the SOPBA-E and implications for amounts already recorded in the SOPBA-E. PG&E noted that it would include the SOPBA-E balance in its next rate change.

requirements, because the adopted SOP forecasts are credits in 2015 of \$6.7 million for gas and \$8.2 million for electric, and in 2016 of \$6.6 million for gas and \$8.1 million for electric.¹³

Tariff Revisions

Revise Electric Preliminary Statement Part GK, *SmartMeter™ Opt-Out Program Balancing Account – Electric (SOPBA-E)* and Gas Preliminary Statement Part DF, *SmartMeter™ Opt-Out Program Balancing Account – Gas (SOPBA-G)*

In order to create new electric and gas balancing accounts in accordance with OP 5 of D.14-12-078, PG&E proposes to revise the existing Electric Preliminary Statement Part GK, *SmartMeter™ Opt-Out Program Balancing Account – Electric (SOPBA-E)*, and Gas Preliminary Statement Part DF, *SmartMeter™ Opt-Out Program Balancing Account – Gas (SOPBA-G)* to remove the adopted forecast SOP. The revised SOPBAs will record the difference between actual expense and capital revenue requirements (based on the cumulative actual capital additions), net of revenues from fees from participating opt-out customers effective January 1, 2015.

Retire Electric Preliminary Statement Part FW, *SmartMeter™ Opt-Out Memorandum Account*, and Gas Preliminary Statement Part CU, *SmartMeter™ Opt-Out Memorandum Account*

Upon approval of this advice letter, PG&E will transfer the revised balances in the SOMAs¹⁴ to the revised SOPBAs for subsequent disposition as part of PG&E's next GRC.

Revise Electric Schedule E-SOP, *Residential Electric SmartMeter™ Opt-Out Program*, and Gas Rate Schedules G-SOP, *Residential Gas SmartMeter™ Opt-Out Program*

In OP 3 of D.14-12-078, the Commission authorized PG&E to "collect the monthly charge from residential customers who opt-out of the program for a period of three years from the date the customer chooses to opt-out." PG&E proposes to revise Electric and Gas Rate Schedules E-SOP and G-SOP, Section 3, Rates, respectively, to reference this provision:

¹³ At the time that PG&E submitted its 2014 GRC application, the CPUC had not yet decided the Phase 2 issues in PG&E's *SmartMeter™ Opt-Out* proceeding, including whether the CPUC would approve community-wide opt-out. As a result, PG&E forecast much higher than actual participation in the *SmartMeter™ Opt-Out Program*, and the adopted forecasts assumed revenues from participating opt-out customers that were significantly greater than PG&E's costs to operate and maintain the program.

¹⁴ Pursuant to OP5 of D.14-12-078, PG&E has removed from the SOMAs revenue requirements for unable-to-complete smart meter installations trips; and costs of hand-held meter reading devices in excess of 200 devices.

“The initial charges will be applicable following the meter exchange. Where a meter exchange is not required, charges will be applicable following enrollment of the customer into the Opt-Out program. The collection of the monthly charge will be applied to the customer’s next billing statement after enrollment in the SmartMeter™ Opt-Out Program and will continue for a period of three years (36 months) from the date that the monthly charge is first applied to the customer’s energy statement.”

Revise Electric and Gas Rule No. 9 – *Rendering and Payment of Bills*

In OP 25 of D.14-12-078, the Commission authorized PG&E to “implement bi-monthly (every two months) meter reading bill plan[s] for customers who elect the smart meter opt-out option.” PG&E proposes to amend Electric and Gas Rule No. 9 with a new Section O, SmartMeter™ Opt-Out – Bi-Monthly Meter , to reference this provision:

- “O. SMARTMETER™ OPT-OUT – BI-MONTHLY METER READING
For customers participating in the SmartMeter™ Opt-Out Program, PG&E will read the meters on a bi-monthly (every two months) basis. PG&E will provide an estimated bill in months when the meter is not read and true-up the bill following the next meter read.”

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

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 18, 2015, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@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 shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Meredith Allen
Senior Director, 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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 1 advice filing become effective on January 1, 2015.

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 parties on the service lists for A.11-03-014 and A.12-11-009. 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/>.

/s/

Meredith Allen
Senior Director, Regulatory Relations

Attachments

cc: Service Lists A.11-03-014 and A.12-11-009

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: **Shirley Wong**

Phone #: **(415) 972-5505**

E-mail: **slwb@pge.com and PGETariffs@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) #: **3568-G/4594-E**

Tier: **1**

Subject of AL: **Implementation of SmartMeter™ Opt Out Phase 2 Decision 14-12-078: Revise the SmartMeter™ Opt-Out Program Balancing Accounts, Electric and Gas Rate Schedules E-SOP and G-SOP, and Electric and Gas Rule 9**

Keywords (choose from CPUC listing): **Compliance, Rule, Balancing Account**

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: **Decision 14-12-078**

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: **January 1, 2015**

No. of tariff sheets: **23**

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: **Gas Preliminary Statement Part CU (SmartMeter™ Opt-Out Memorandum Account), Electric Preliminary Statement Part FW (SmartMeter™ Opt-Out Memorandum Account), Gas Preliminary Statement Part DF (SmartMeter™ Opt-Out Program Balancing Account), Electric Preliminary Statement GK (SmartMeter™ Opt-Out Program Balancing Account), Gas Schedule G-SOP (Residential Gas SmartMeter™ Opt-Out Program), Electric Schedule E-SOP (Residential Electric SmartMeter™ Opt-Out Program), and Gas and Electric Rule No. 9**

Service affected and changes proposed: **See "Tariff Revisions" section in advice letter.**

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

EDTariffUnit

505 Van Ness Ave., 4th Floor

San Francisco, CA 94102

E-mail: **EDTariffUnit@cpuc.ca.gov**

Pacific Gas and Electric Company

Attn: Meredith Allen, Senior Director, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: **PGETariffs@pge.com**

**ATTACHMENT 1
Advice 3568-G**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
31909-G	GAS PRELIMINARY STATEMENT PART DF SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - GAS (SOPBA-G) Sheet 1	31537-G
31910-G	GAS PRELIMINARY STATEMENT PART DF SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - GAS (SOPBA-G) Sheet 2	31538-G
31911-G	GAS PRELIMINARY STATEMENT PART DF SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - GAS (SOPBA-G) Sheet 3	31539-G
31912-G	GAS SCHEDULE G-SOP RESIDENTIAL GAS SMARTMETER(TM) OPT- OUT PROGRAM Sheet 1	29534-G
31913-G	GAS SCHEDULE G-SOP RESIDENTIAL GAS SMARTMETER(TM) OPT- OUT PROGRAM Sheet 2	29535-G
31914-G	GAS RULE NO. 9 RENDERING AND PAYMENT OF BILLS Sheet 1	24128-G
31915-G	GAS RULE NO. 9 RENDERING AND PAYMENT OF BILLS Sheet 9	
31916-G	GAS TABLE OF CONTENTS Sheet 1	31870-G
31917-G	GAS TABLE OF CONTENTS Sheet 3	31867-G
31918-G	GAS TABLE OF CONTENTS Sheet 5	31833-G
31919-G	GAS TABLE OF CONTENTS Sheet 6	31781-G*



GAS PRELIMINARY STATEMENT PART DF
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - GAS (SOPBA-G)

Sheet 1
 (T)

DF. SmartMeter™ Opt-Out Program Balancing Account - Gas (SOPBA-G)

1. **PURPOSE:** The purpose of the SOPBA-G is to record the difference between actual revenue requirements related to PG&E's SmartMeter™ Opt-Out Program as approved in Decision (D.) 14-12-078 and the associated revenues from fees received from Opt-Out Program participants. The Opt-Out Program provides an option for residential customers who do not wish to have a wireless SmartMeter™ installed at their residences. PG&E shall record the revenue requirements associated with the SmartMeter™ Opt-Out Program costs and revenues in a two-way balancing account for future recovery of these revenue requirements. Costs that can be attributed specifically to gas service will be recorded to this account. General costs that cannot be attributed specifically either to providing gas service or electric service shall be allocated 55% electric and 45% gas. All revenues from the gas portion of the charges (i.e., initial amount and monthly charge) from participating customers will be credited to the SOPBA-G. (T)
2. **APPLICABILITY:** The SOPBA-G shall apply to gas residential customers only, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balance in this account shall be determined by the Commission in a future proceeding. (T)
4. **RATES:** The SOPBA-G rate component is set forth in Gas Rate Schedule G-SOP.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the SOPBA-G by making entries to this account at the end of each month as follows:
 - a) A debit entry equal to the gas portion of PG&E's actual incremental Operating and Maintenance (O&M) and Administrative and General (A&G) operating expenses and capital-related revenue requirements, excluding associated Franchise Fees and Uncollectibles (FF&U) expense, incurred for all the activities PG&E is required to undertake to manage the SmartMeter™ Opt-Out Program. The capital-related revenue requirements will include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installing equipment, including the ongoing capital revenue requirements associated with capital additions since inception of the program. These capital, O&M, and A&G costs include implementation costs associated with the activities described below and may relate to numerous activities or organizations, including but not limited to:
 - The expenses for customer outreach, Call Center communications, and other written and oral communications regarding the SmartMeter™ Opt-Out Program.
 - The expenses for customer operations activities, such as managing enrollment, changing of parties following starts/stops in service, revising meter-reading routes, handling and responding to customer requests, all related billing and payment processes, and all associated employee-training and communications. (T)
 - The expenses for bi-monthly meter reading of the gas analog mechanical meters. (T)

(Continued)



GAS PRELIMINARY STATEMENT PART DF
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - GAS (SOPBA-G)

Sheet 2
(T)

5. ACCOUNTING PROCEDURE (Cont'd)

- The expenses related to testing analog meters to comply with Commission Rule 17 and the Commission's Direct Access standards for metering and meter data in California.
 - The expenses for ongoing engineering, monitoring the integrity of the SmartMeter™ mesh network needed as new customers request analog meters and identifying where additional network devices must be installed to maintain communications system integrity.
 - The expenses for any incremental increase in uncollectible expenses in excess of those projected in the utility's last general rate case that are attributable to the SmartMeter™ Opt-Out Program.
 - The expenses for program administration, including regulatory reporting.
 - The expenses associated with benefits that SmartMeters™ would have provided had they been in place as anticipated in D.06-07-027 and D.09-03-026, including but not limited to manual processing of service-terminations, manual checks of lost service, and manual restoration of service that SmartMeters™ could have performed remotely.
 - The expenses associated with information technology projects, upgrades, or equipment used to manage the 36-month limitation on customer fees and/or bi-monthly meter-reading. (N)
I
(N)
 - The capital cost of purchasing analog meters for residential gas customers who wish to replace the wireless SmartMeter™ installed at their residences, including procurement, materials handling, and inventory costs.
 - The capital cost of removing the gas SmartMeter™ module on gas mechanical meters for residential gas customers who wish to replace the wireless SmartMeter™ module installed at their residences, retiring the module, and installing a new face plate on the gas analog mechanical meters, including removal, procurement, materials handling, and inventory costs. For those modules that are not retired but are refurbished and reused, these costs will be expensed.
 - The capital cost of reinstalling a gas SmartMeter™ module if a customer electing opt-out service moves (change of party) or determines they no longer wish to participate in the Opt-Out Program. (T)
 - The capital cost of reinstalling a gas SmartMeter™ module if a customer electing opt-out service does not pay the initial charge within 90 days and the customer is removed from the Opt-Out Program and returned to wireless-SmartMeter™-based service, as required by D.12-02-014. (T)
 - The capital cost of purchasing up to 200 hand-held meter-reading devices and for programming PG&E's Information Technology (IT) systems to receive the meter-reading data. (T)
- (L)

(Continued)



GAS PRELIMINARY STATEMENT PART DF
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - GAS (SOPBA-G)

Sheet 3
(T)

5. ACCOUNTING PROCEDURE (Cont'd)

- The capital cost of purchasing network equipment to compensate for reduced connectivity associated with removal of RF-based meters. (L)
|
 - The capital cost of installing and/or relocating network equipment to compensate for reduced connectivity associated with removal of RF-based meters. (L)
|
 - The capital cost of purchasing additional network devices, including procurement, materials handling, and inventory costs.
 - The capital cost of engineering site-specific installations of any additional network devices and installing these devices.
 - The capital cost of information technology projects, upgrades, or equipment used to manage the 36-month limitation on customer fees and/or bi-monthly meter-reading. (N)
|
(N)
- b) A credit entry equal to the gas portion of initial and/or monthly charges for the SmartMeter™ Opt-Out Program. (D)
- c) A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. (T)
- d) A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts upon approval by the Commission. (T)
(T)
(D)

(Continued)



GAS SCHEDULE G-SOP
RESIDENTIAL GAS SMARTMETER(TM) OPT-OUT PROGRAM

Sheet 1

1. **APPLICABILITY:** This program is available to all residential customers who do not wish to have a wireless, communicating meter, known as a SmartMeter™, installed at their premises (hereafter, "Opt-Out Customers"). Under this program, customers may receive service using an analog meter. This schedule is applicable to customers that take gas-only service from PG&E. Customers who take both gas and electric service, or electric-only service, from PG&E and wish to have analog meters used for service should refer to Schedule E-SOP for terms and conditions of service.

2. **TERRITORY:** This schedule applies everywhere that PG&E provides gas service.

3. **RATES:** Customers who elect this option will be charged as follows:

Customers who take service on the California Alternate Rates for Energy (CARE) program will pay an initial amount and a monthly charge. The initial amount is \$10 for this service. In addition, these customers will pay \$5 per month for analog meter service.

Customers who are not taking service on the CARE program will pay an initial amount and a monthly charge. The initial amount is \$75 for this service. In addition, these customers will pay \$10 per month for analog meter service.

The initial and monthly charges described above are applicable to customers who receive only gas service from PG&E. Customers who take both gas and electric service from PG&E, and wish to have an analog gas meter installed, should refer to Schedule E-SOP, the Residential Electric SmartMeter™ Opt-Out Program, for the associated charges.

The initial charges will be applicable following the meter exchange. Where a meter exchange is not required, charges will be applicable following enrollment of the customer into the Opt-Out program. The collection of the monthly charge will be applied to the customer's next billing statement after enrollment in the SmartMeter™ Opt-Out Program and will continue for a period of three years (36 months) from the date that the monthly charge is first applied to the customer's energy statement.

(T)
|
(T)

(Continued)



GAS SCHEDULE G-SOP
RESIDENTIAL GAS SMARTMETER(TM) OPT-OUT PROGRAM

Sheet 2

4. **METERING EQUIPMENT:** At PG&E's discretion, the SmartMeter™-module will be removed from the gas meter, or the gas meter will be exchanged for an analog gas meter, at premises where PG&E provides gas service.

5. **BILLING:** Customers will be billed for charges applicable under the customer's Otherwise Applicable Rate Schedule (OAS), plus the initial amount and monthly charge described herein.

The initial amount and monthly charge will appear on a customer's electric service agreement when the customer takes both gas and electric service from PG&E. The initial amount and monthly charge will appear on the customer's gas service agreement if the customer takes only gas service from PG&E under this Schedule.

Opt-Out Program customers will be charged the initial and monthly charges described above once the analog meter(s) is installed, and they will be required to pay the initial amount within 90 days. Charges will continue for 36 months as noted in Section 3 above. All such charges will be subject to the terms and conditions for rendering and payment of bills under Gas Rules 8 and 9.

(T)
(T)

Pursuant to Decision 12-02-014, a customer must affirmatively elect to opt-out of the SmartMeter™ Program, and shall default to SmartMeter™-based utility service absent such an election. If PG&E makes a field visit to a customer's residence for purposes of installing a SmartMeter™ and the customer does not provide reasonable access to PG&E to install a SmartMeter™ after being provided notice of eligibility for service under this Opt-Out Program and not electing to opt-out, the customer shall be deemed to have elected service under this Opt-Out Program.



GAS RULE NO. 9
RENDERING AND PAYMENT OF BILLS

Sheet 1

A. BILLS PREPARED AT REGULAR INTERVALS

Bills for gas service will be rendered at regular intervals. All bills will be based on meter registration or actual usage data, except as provided in C, G and O below, or as may otherwise be provided in PG&E's tariffs. (T)

Meters will be read as nearly as possible at regular intervals. Except as otherwise stated the regular billing period will be once each month. Due to Sundays and Holidays it is not always possible to read meters on the same day of each month. Where the monthly period is less than 27 days or more than 33 days, a pro rata correction will be made in the bill on the basis of the number of days in the period in question to the total days in an average month, which will be taken as 30 days. Where, however, daily equivalents are used in place of fixed monthly charges, there will be no pro rata correction. Instead, the calculation shall use the number of days in the billing period multiplied by the daily equivalent charge. Where daily baseline or medical quantities are used, the calculation shall use the number of days in the billing period multiplied by the daily equivalent therms.

Whenever PG&E's rate schedules include an annual minimum, an annual service or an annual demand charge, said charge is to be payable in twelve (12) equal monthly installments throughout the year unless otherwise provided in the rate schedule.

B. PRO RATA CORRECTION

Except as provided in Section J below, opening and closing bills and monthly bills for gas service rendered for periods of less than 27 days or more than 33 days will be computed in accordance with this rule, but unless otherwise provided in the applicable rate schedule the amount of the blocks in the schedule and the minimum charge will be prorated on the basis of the number of days in the period in question to the total number of days in an average month, as specified in Section A above. However, where daily equivalents are used, there will be no prorata correction. Instead, the calculation shall use the number of days in the billing period multiplied by the daily equivalent charge.

When one or more regularly scheduled meter readings have been missed, the proration factor for the next regularly scheduled meter reading shall be 1.000 times the number of monthly billing cycles in the period. When an interim bill based on a special reading for a period other than 27 to 33 days has been issued during the interval since the last regularly scheduled meter reading, the proration factor for the regularly scheduled bill shall be the factor derived above, less the proration factor applied to the interim bill. However, where daily equivalents are used, there will be no pro rata correction. Instead, the calculation shall use the number of days in the billing period multiplied by the daily equivalent charge.

(Continued)



GAS RULE NO. 9
RENDERING AND PAYMENT OF BILLS

Sheet 9

O. SMARTMETER™ OPT-OUT – BI-MONTHLY METER READING

For customers participating in the SmartMeter™ Opt-Out Program, PG&E will read the meters on a bi-monthly (every two months) basis. PG&E will provide an estimated bill in months when the meter is not read and true-up the bill following the next meter read.

(N)
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(N)



Pacific Gas and Electric Company
San Francisco, California
U 39

Revised
Cancelling Revised

Cal. P.U.C. Sheet No.
Cal. P.U.C. Sheet No.

31916-G
31870-G

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Advice 4594-E**

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ELECTRIC PRELIMINARY STATEMENT PART GK
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - ELECTRIC (SOPBA-E)

Sheet 1
(T)

GK. SmartMeterTM Opt-Out Program Balancing Account - Electric (SOPBA-E)

1. **PURPOSE:** The purpose of the SOPBA-E is to record the difference between actual revenue requirements related to PG&E's SmartMeterTM Opt-Out Program as approved in Decision (D.) 14-12-078 and the associated revenues from fees received from Opt-Out Program participants. The Opt-Out Program provides an option for residential customers who do not wish to have a wireless SmartMeterTM installed at their residences. PG&E shall record the revenue requirements associated with the SmartMeterTM Opt-Out Program costs and revenues in a two-way balancing account for future recovery of these revenue requirements. Costs that can be attributed specifically to electric service will be recorded to this account. General costs that cannot be attributed specifically either to providing gas service or electric service shall be allocated 55% electric and 45% gas. All revenues from the electric portion of the charges (i.e., initial amount and monthly charge) from participating customers will be credited to the SOPBA-E. (T)
2. **APPLICABILITY:** The SOPBA-E shall apply to electric residential customers only, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balance in this account shall be determined by the Commission in a future proceeding. (T)
4. **RATES:** The SOPBA-E rate component is set forth in Electric Rate Schedule E-SOP.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the SOPBA-E by making entries to this account at the end of each month as follows:
 - a) A debit entry equal to the electric portion of PG&E's actual incremental Operating and Maintenance (O&M) and Administrative and General (A&G) operating expenses and capital-related revenue requirements, excluding associated Franchise Fees and Uncollectibles (FF&U) expense, incurred for all the activities PG&E is required to undertake to manage the SmartMeterTM Opt-Out Program. The capital-related revenue requirements will include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installing equipment, including the ongoing capital revenue requirements associated with capital additions since inception of the program. These capital, O&M, and A&G costs include implementation costs associated with the activities described below and may relate to numerous activities or organizations, including but not limited to:
 - The expenses for customer outreach, Call Center communications, and other written and oral communications regarding the SmartMeterTM Opt-Out Program.
 - The expenses for customer operations activities, such as managing enrollment, changing of parties following starts/stops in service, revising meter-reading routes, handling and responding to customer requests, all related billing and payment processes, and all associated employee-training and communications. (T)
 - The expenses for bi-monthly meter reading of any electric analog meters, and in limited cases, the solid-state digital meters for those residential electric customers on rate schedules that require special meters. (T)

(Continued)



ELECTRIC PRELIMINARY STATEMENT PART GK
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - ELECTRIC (SOPBA-E)

Sheet 2
 (T)

5. ACCOUNTING PROCEDURE (Cont'd)

- The expenses related to testing analog meters, and, in limited cases, the solid-state digital meters for those residential electric customers on rate schedules that require special meters, in order to comply with Commission Rule 17 and the Commission's Direct Access standards for metering and meter data in California.
- The expenses for monitoring the integrity of the SmartMeter™ mesh network as customer opt-outs create gaps in the network, including engineering, and identifying where additional network devices should be added for system integrity.
- The expenses for any incremental increase in uncollectible expenses in excess of those projected in the utility's last general rate case that are attributable to the SmartMeter™ Opt-Out Program.
- The expenses for program administration, including regulatory reporting.
- The expenses associated with benefits that SmartMeters™ would have provided had they been in place as anticipated in D.06-07-027 and D.09-03-026, including but not limited to manual processing of service-terminations, manual checks of lost service, and manual restoration of service that SmartMeters™ could have performed remotely.
- The expenses associated with information technology projects, upgrades, or equipment used to manage the 36-month limitation on customer fees and/or bi-monthly meter-reading. (N)
 I
 (N)
- The capital cost of purchasing analog meters for residential electric customers who wish to replace the wireless SmartMeter™ installed at their residences, including procurement, materials handling, and inventory costs. For the great majority of customers, these meters will be analog electromechanical meters. For a very small number of residential electric customers on rate schedules that require special meters (e.g., Time-of-Use customers), these meters will be solid-state digital meters.
- The capital cost of replacing the electric SmartMeters™ with the electric analog meters, and in limited cases the solid-state digital meters for those residential electric customers on rate schedules that require special meters. (T)
- The capital cost of reinstalling an electric SmartMeter™ if a customer electing opt-out service moves (change of party) or determines they no longer wish to participate in the Opt-Out Program. (T)
- The capital cost of reinstalling an electric SmartMeter™ if a customer electing opt-out service does not pay the initial charge within 90 days and the customer is removed from the Opt-Out Program and returned to wireless-SmartMeter™-based service, as required by D.12-02-014. (T)
- The capital cost of purchasing up to 200 hand-held meter-reading devices and for programming PG&E's Information Technology (IT) systems to receive the meter-reading data. (T)
- The capital cost of purchasing network equipment to compensate for reduced connectivity associated with removal of RF-based meters.

(Continued)



ELECTRIC PRELIMINARY STATEMENT PART GK
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - ELECTRIC (SOPBA-E)

Sheet 3
(T)

5. ACCOUNTING PROCEDURE (Cont'd)

- The capital cost of installing and/or relocating network equipment to compensate for reduced connectivity associated with removal of RF-based meters.
- The capital cost of purchasing additional network devices, including procurement, materials handling, and inventory costs.
- The capital cost of engineering site-specific installations of any additional network devices and installing these devices.
- The capital cost of information technology projects, upgrades, or equipment used to manage the 36-month limitation on customer fees and/or bi-monthly meter-reading. (N)
(N)
- b) A credit entry equal to the electric portion of initial and/or monthly charges for the SmartMeter™ Opt-Out Program. (D)
(T)
- c) A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. (T)
(T)
- d) A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts upon approval by the Commission. (T)
(T)
(D)

(Continued)

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ELECTRIC SCHEDULE E-SOP
RESIDENTIAL ELECTRIC SMARTMETER(TM) OPT-OUT PROGRAM

Sheet 1

1. **APPLICABILITY:** This program is available to all residential customers who do not wish to have a wireless, communicating meter, known as a SmartMeter™, installed at their premises (hereafter, "Opt-Out Customers"). Under this program, customers may receive service using an analog meter(s). Customers taking service under Schedule E-RSMART, Residential SmartRate™, are not eligible for this program. This schedule is applicable to customers who take gas and electric service, or electric-only service, from PG&E.

2. **TERRITORY:** This schedule applies everywhere that PG&E provides electric and gas service.

3. **RATES:** Customers who elect this option will be charged as follows:

Customers who take service on either the California Alternate Rates for Energy (CARE) or Family Electric Rate Assistance (FERA) programs will pay an initial amount and a monthly charge. The initial amount is \$10 for this service. In addition, these customers will pay \$5 per month for analog meter service.

Customers who are not taking service on CARE or FERA programs will pay an initial amount and a monthly charge. The initial amount is \$75 for this service. In addition, these customers will pay \$10 per month for analog meter service.

The initial and monthly charges described above are applicable to customers who receive gas and electric service, or receive electric-only service, from PG&E. Customers that take only gas service from PG&E, and wish to have an analog gas meter installed, should refer to Schedule G-SOP, the Residential Gas SmartMeter™ Opt-Out Program, for the associated charges.

The initial charges will be applicable following the meter exchange. Where a meter exchange is not required, charges will be applicable following enrollment of the customer into the Opt-Out program. The collection of the monthly charge will be applied to the customer's next billing statement after enrollment in the SmartMeter™ Opt-Out Program and will continue for a period of three years (36 months) from the date that the monthly charge is first applied to the customer's energy statement.

(T)
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(T)

(Continued)



ELECTRIC SCHEDULE E-SOP
RESIDENTIAL ELECTRIC SMARTMETER(TM) OPT-OUT PROGRAM

Sheet 2

4. **METERING EQUIPMENT:** A non-communicating meter will be used to provide electric service for customers who elect this option. For the great majority of customers, these meters will be analog meters. For a very small number of residential electric customers that require special meters, these meters will be non-communicating solid-state digital meters.

For example, analog meters are not available to support electric time-of-use service, such that analog meters may not be used for electric service under time-of-use rate schedules, including Schedules EM-TOU, EML-TOU, E-6, EL-6, E-7, EL-7, and E-9. Customers served under time-of-use rate schedules may elect to have an analog non-communicating meter installed and take service under any non-time-of-use schedule for which they are eligible, such as Schedule E-1, or, alternatively, may remain on their current time-of-use rate schedule and choose to elect service under this Opt-Out Program using a non-communicating solid state digital time-of-use meter.

5. **BILLING:** Customers will be billed for charges applicable under the customer's Otherwise Applicable Rate Schedule (OAS), plus the initial amount and the monthly charge described herein. The initial amount and monthly charge will appear on the electric service agreements of both customers that take electric-only service from PG&E and customers that take gas and electric service from PG&E. Opt-Out Program customers will be charged the initial and monthly charges described above once the replacement meter(s) is installed, and they will be required to pay the initial amount within 90 days. Charges will continue for 36 months as noted in Section 3 above. All such charges will be subject to the terms and conditions for rendering and payment of bills under Electric Rules 8 and 9.

(T)

(T)

Pursuant to Decision 12-02-014, a customer must affirmatively elect to opt-out of the SmartMeter™ Program, and shall default to SmartMeter™-based utility service absent such an election. If PG&E makes a field visit to a customer's residence for purposes of installing a SmartMeter™ and the customer does not provide reasonable access to PG&E to install a SmartMeter™ after being provided notice of eligibility for service under this Opt-Out Program and not electing to opt-out, the customer shall be deemed to have elected service under this Opt-Out Program.



ELECTRIC RULE NO. 9
RENDERING AND PAYMENT OF BILLS

Sheet 1

A. BILLS PREPARED AT REGULAR INTERVALS

Bills for electric service will be rendered at regular intervals. All bills will be based on meter registration or actual usage data, except as provided in C, G and O below, or as may otherwise be provided in PG&E's tariffs. (T)

Meters will be read as nearly as possible at regular intervals. Except as otherwise stated the regular billing period will be once each month. Due to Sundays and Holidays it is not always possible to read meters on the same day of each month. Where the monthly period is less than 27 days or more than 33 days, a pro rata correction will be made in the bill based on the number of days in the period in question to the total days in an average month, which will be taken as 30 days. Where, however, daily equivalents are used in place of fixed monthly charges, there will be no pro rata correction. Instead, the calculation shall use the number of days in the billing period multiplied by the daily equivalent charge. Where daily baseline or medical quantities are used, the calculation shall use the number of days in the billing period multiplied by the daily equivalent kilowatthours (kWh).

Whenever PG&E's rates include an annual minimum, an annual service or an annual demand charge, said charge is to be payable in twelve (12) equal monthly installments throughout the year where service is not seasonal; where service is seasonal in nature, such as for agricultural, reclamation, wineries, etc., such charges shall be due and payable in equal monthly installments during the normal period of use, unless otherwise specified in PG&E's tariffs. Where such charges are based on the maximum demand during the year, the proportionate amount due and payable at the end of any month shall be based on the maximum demand which shall have occurred during the contract year up to that time.

B. PRO RATA CORRECTION

Except as provided in Section J below, opening and closing bills and monthly bills for electric service rendered for periods of less than 27 days or more than 33 days will be computed in accordance with the rate schedule applicable to that service, but (unless otherwise provided in this rule, or in the applicable rate schedule) the amount of energy blocks, demand blocks, etc., and the service charge, demand charge, or minimum charge will be prorated on the basis of the number of days in the period in question to the total number of days in an average month, as specified in Section A above. However, where daily equivalents are used, there will be no pro rata correction. Instead, the calculation shall use the number of days in the billing period multiplied by the daily equivalent charge.

(Continued)



ELECTRIC RULE NO. 9
RENDERING AND PAYMENT OF BILLS

Sheet 9

O. SMARTMETER™ OPT-OUT – BI-MONTHLY METER READING

For customers participating in the SmartMeter™ Opt-Out Program, PG&E will read the meters on a bi-monthly (every two months) basis. PG&E will provide an estimated bill in months when the meter is not read and true-up the bill following the next meter read.

(N)
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(N)



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Decision No. 14-12-078

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Steven Malnight
Senior Vice President
Regulatory Affairs

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Resolution No. _____



ELECTRIC TABLE OF CONTENTS RATE SCHEDULES

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Advice Letter No: 4594-E
Decision No. 14-12-078

Issued by
Steven Malnight
Senior Vice President
Regulatory Affairs

Date Filed
Effective
Resolution No.

February 26, 2015
January 1, 2015



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Rolling Revenue Requirements
From 2014 GRC through 2016
in thousands

	Electric Distribution	Electric Generation	Gas Distribution	Total
2014 Adopted GRC RRO	3,862,187	1,778,734	1,584,276	7,225,197
less: Other Operating Revenue	74,537	17,940	25,228	117,705
less: FERC jurisdictional amount	13,002	6	0	13,008
Rounding	(1)	0	1	0
2014 Base Revenue Amount (Eff. 1/1/14)	3,774,649	1,760,788	1,559,047	7,094,484
Removed Forecasted Savings Credits included in the Adopted GRC Revenue Requirement*				
Solar PV Program Savings (2011-2013)		31,000		31,000
DOE Litigation Funds (2011-2012, net of costs)		121,821		121,821
Associated FF&U		1,809		1,809
2014 Base Revenue Amount excl Credits (Eff. 1/1/14)	3,774,649	1,915,418	1,559,047	7,249,114
2014 Pension	85,684	48,362	46,015	180,061
2014 Smart Grid Pilot Deployment Projects	577	492		1,069
2014 Base Revenue Amount (Eff. 1/1/14)	3,860,910	1,964,272	1,605,062	7,430,244
Hercules Municipal Utility Assets - NBV	1,131			1,131
2014 Base Revenue Amount (Eff. 4/10/14)	3,862,041	1,964,272	1,605,062	7,431,375
2013 Solar PV Program - 10 West Gates MWs		7,480		7,480
2014 Base Revenue Amount (Eff. 6/6/14)	3,862,041	1,971,752	1,605,062	7,438,855
2013 Solar PV Program - 20 Gates MWs		14,960		14,960
2014 Base Revenue Amount (Eff. 6/7/14)	3,862,041	1,986,712	1,605,062	7,453,815
2012 Solar PV Program - Cantua 20 MWs		14,560		14,560
2014 Base Revenue Amount (Eff. 6/26/14)	3,862,041	2,001,272	1,605,062	7,468,375
2012 Solar PV Program - Huron 20 MWs		14,560		14,560
2014 Base Revenue Amount (Eff. 6/28/14)	3,862,041	2,015,832	1,605,062	7,482,935
2012 Solar PV Program - Giffen 10 MWs		7,280		7,280
2014 Base Revenue Amount (Eff. 7/2/14)	3,862,041	2,023,112	1,605,062	7,490,215
2013 Solar PV Program - 20 Guernsey MWs		14,960		14,960
2014 Base Revenue Amount (Eff. 7/31/14)	3,862,041	2,038,072	1,605,062	7,505,175
2011 Solar PV Program - Westside 15 MWs		10,875		10,875
2014 Base Revenue Amount (Eff. 8/31/14)	3,862,041	2,048,947	1,605,062	7,516,050
2011 Solar PV Program - Five Points 15 MWs		10,875		10,875
2014 Base Revenue Amount (Eff. 9/24/14)	3,862,041	2,059,822	1,605,062	7,526,925
2011 Solar PV Program - 20 Stroud MWs		14,500		14,500
2014 Base Revenue Amount (Eff. 9/26/14)	3,862,041	2,074,322	1,605,062	7,541,425
Attrition:				
Removed Forecasted Savings Credits included in the Adopted Attrition GRC Revenue Requirement*				
2015 Attrition	201,979	28,166	93,834	323,979
DOE Litigation Funds (2015 Estimate, net of costs)		20,000		20,000
Associated FF&U		236		236
Attrition Subtotal	201,979	48,402	93,834	344,215
Pension:				
Reverse 2014 Pension	(85,684)	(48,362)	(46,015)	(180,061)
2015 Pension	93,891	52,994	50,422	197,307
Smart Grid Pilot Deployment Projects:				
Reverse 2014 Smart Grid Pilot Deployment Projects	(577)	(492)		(1,069)
2015 Smart Grid Pilot Deployment Projects	(3,535)	(3,097)		(6,632)
Hercules Municipal Utility Assets - NBV:				
Reverse 2014 Hercules Municipal Utility Assets - NBV	(1,131)			(1,131)
2015 Hercules Municipal Utility Assets - NBV	1,097			1,097
Reverse 2015 SmartMeter™ Opt-Out Program	8,190		6,701	14,891
2015 Base Revenue Amount (Eff. 1/1/15)	4,076,271	2,123,767	1,710,004	7,910,042

*Actual savings credits will be transferred to the Utility Generation Balancing Account and refunded to customers as part of the Annual Electric True-up advice filing process.

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

AT&T	Division of Ratepayer Advocates	Occidental Energy Marketing, Inc.
Albion Power Company	Douglass & Liddell	OnGrid Solar
Alcantar & Kahl LLP	Downey & Brand	Pacific Gas and Electric Company
Anderson & Poole	Ellison Schneider & Harris LLP	Praxair
BART	G. A. Krause & Assoc.	Regulatory & Cogeneration Service, Inc.
Barkovich & Yap, Inc.	GenOn Energy Inc.	SCD Energy Solutions
Bartle Wells Associates	GenOn Energy, Inc.	SCE
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
California Cotton Ginners & Growers Assn	Green Power Institute	SPURR
California Energy Commission	Hanna & Morton	Seattle City Light
California Public Utilities Commission	In House Energy	Sempra Utilities
California State Association of Counties	International Power Technology	SoCalGas
Calpine	Intestate Gas Services, Inc.	Southern California Edison Company
Casner, Steve	K&L Gates LLP	Spark Energy
Cenergy Power	Kelly Group	Sun Light & Power
Center for Biological Diversity	Linde	Sunshine Design
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Tecogen, Inc.
City of San Jose	Los Angeles Dept of Water & Power	Tiger Natural Gas, Inc.
Clean Power	MRW & Associates	TransCanada
Coast Economic Consulting	Manatt Phelps Phillips	Utility Cost Management
Commercial Energy	Marin Energy Authority	Utility Power Solutions
Cool Earth Solar, Inc.	McKenna Long & Aldridge LLP	Utility Specialists
County of Tehama - Department of Public Works	McKenzie & Associates	Verizon
Crossborder Energy	Modesto Irrigation District	Water and Energy Consulting
Davis Wright Tremaine LLP	Morgan Stanley	Wellhead Electric Company
Day Carter Murphy	NLine Energy, Inc.	Western Manufactured Housing Communities Association (WMA)
Defense Energy Support Center	NRG Solar	YEP Energy
Dept of General Services	Nexant, Inc.	