

July 2, 2002

Advice 2197-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Optional Meter Data Access Charge for Voluntary Installation of Real-Time Pricing Meters

Pacific Gas and Electric Company (PG&E) hereby submits this third supplemental advice filing for revisions to its electric tariffs. Only the advice letter is an addendum to Advice 2197-E and the affected tariff sheets are identified in Advice 2197-E and in enclosed Attachment I in that filing.¹

Purpose

This advice filing is to provide further clarification to Advice 2197-E, *Optional Meter Data Access Charge for Voluntary Installation of Real-Time Pricing Meter*.

In compliance with Decision (D.) 01-09-062, issued September 20, 2001, and following further instructions from the Commission's Energy Division, PG&E hereby submits this supplemental advice filing to provide additional information regarding the implementation of an optional meter data access charge for customers who wish to arrange for the installation of a real-time pricing meter on a voluntary basis.

In accordance with Energy Division's request, PG&E had filed two concurrent advice letters this on February 15, 2002: (1) Advice 2150-E-B, which re-submitted PG&E's TOU rate proposal (and was approved on March 12, 2002, with an effective date of September 20, 2001); and (2) Advice 2197-E, which requested authority for PG&E's recommended meter data access charge for customers who arrange for a real time pricing (RTP) meter installation on a voluntary basis.

¹ PG&E reserves all legal rights to challenge the decisions or statutes under which it has been required to make this advice filing, and nothing in this advice filing constitutes a waiver of such rights. Also, PG&E reserves any additional legal rights to challenge the requirement to make this advice filing by reason of its status as a debtor under Chapter 11 of the Bankruptcy Code, and nothing in this advice filing constitutes a waiver of such rights.

Background

PG&E submitted Advice 2150-E on August 8, 2001. In D. 01-09-062, the Commission adopted PG&E's time-of-use (TOU) rate proposal as submitted in Advice 2150-E, with the following modifications:

1. Those customers currently receiving service under Schedule A-10 who are not eligible to receive a new RTP meter under the ABX1 29 meter program should be offered the opportunity to pay for a meter and participate in the new TOU pricing program on a voluntary basis;
2. Customers assigned to the new TOU pricing program should be permitted to change to a voluntary TOU rate schedule (e.g., Schedule A-6 or E-19V) if they wish to make such a change, without being subject to the 12-month waiting period that is ordinarily required after a customer voluntarily changes rate schedules; and
3. The new TOU prices should become effective for those customers who receive new meters under the ABX1 29 meter program upon the first regularly scheduled meter read which occurs after the new metering system has been installed.

In compliance with D. 01-09-062, PG&E submitted Advice 2150-E-A on September 27, 2001. The revised tariff sheets for electric rate Schedule A-10, which PG&E submitted in Advice 2150-E-A, included modifications to the "Applicability" section of that tariff to:

- (1) define the effective date for assignment of customers to the new TOU pricing program;
- (2) allow for voluntary assignment of other electric rate Schedule A-10 customers to the new TOU pricing program if they reimburse PG&E for all necessary meter purchase and installation costs; and
- (3) provide the voluntary TOU customers with an option of paying for and receiving the same Internet-based access to the electric load information recorded by their RTP meter that will already be available at no charge to the new mandatory TOU customers.²

No revisions of PG&E's existing tariffs were needed to allow for ABX1 29 customers to voluntarily elect service under other applicable TOU rate schedules, because the waiting period defined in PG&E's electric Rule 12 – *Rates and Optional Rates*, will not apply to the initial mandatory assignment to the new electric rate Schedule A-10 TOU pricing program.

² Those customers who receive state-funded RTP meters under ABX1 29 will receive one year of the Internet-based access to their interval load data at no charge, because the CEC has elected to use ABX1 29 funds to assume all of the costs of providing these customers with the first year of data access.

In Advice 2150-E-A, PG&E also submitted a new standard electric service agreement, *Interval Meter and Meter Data Management Service Agreement* (Form 79-984). This agreement provided the terms and conditions under which those customers who wish to voluntarily enroll in the new TOU pricing programs would pay to receive interval meters and internet-based access to the electric load information recorded by meters.

Those customers include:

- 1) Customers who did not qualify for the ABX1 29 meter program because their load demand was less than 200 kilowatts, and
- 2) Customers who established new electric service after D. 01-09-062 was issued and were not included in the ABX1 29 meter program,

Electric rate Schedules A-6, A-10, and E-19 were included in Advice 2150-E-A, because customers on these rate schedules with less than 200 kilowatts want the option of voluntarily paying for an interval meter and internet-based access to the electric load information recorded by the meters.

In addition, these electric rate schedules (A-6, A-10, E-19, and E-20) were also included because customers on these rate schedules that established new electric service after D. 01-09-062 was issued, want the option of voluntarily paying for an interval meter and internet-based access to the electric load information recorded by the meters.

Two limited protests were submitted in response to Advice. 2150-E-A which addressed the level of PG&E's recommended data access charge. Energy Division staff requested that PG&E re-file its TOU rate proposal and separate the issue on new TOU pricing programs and the request to authorize PG&E's recommended meter data access charge for those customers who arrange for a RTP meter installation on a voluntary basis.

Thus, PG&E then submitted Advice 2150-E-B, *Revenue Neutral Time-of-Use Rate Schedule-Electric Rate Schedule A-10* and Advice 2197-E *Add Meter Data Access Charge Language for Voluntary Installation of Real-Time Pricing Meters*, on February 15, 2002. One limited protest was submitted in response to Advice 2197-E, addressing a more precise definition of the phrase "over 200 kilowatts" and asking for clarification that customers who receive hourly meters will not be automatically placed on hourly PX prices following the end of the rate freeze. The protest was submitted to the Commission on March 6, 2002. PG&E submitted a response to the protest on March 14, 2002.

PG&E notes that the first recommendation provided in the protest could be accommodated through the issuance of a Commission resolution or other instructions approving Advice 2197-E, with sufficient specificity so as to provide a basis for moving forward under the expanded definition of the 200 kW threshold.

In the second recommendation, PG&E agrees with the protest that many customers would probably appreciate additional guidance from the Commission as to how the hourly pricing provisions from D. 00-06-034 should be interpreted in light of all of the events that have occurred subsequent to that decision.

Upon the recommendation of the Energy Division, PG&E hereby submits this supplemental advice filing to provide additional information regarding the implementation of an optional meter data access charge for customers who wish to arrange for the installation of a real-time pricing meter on a voluntary basis.

Tariff Revisions

In Advice 2197-E, PG&E submits revisions to electric rate Schedules A-6--*Small General Time-of-Use Service*; A-10—*Medium General Demand-Metered Service*; and E-19--*Medium General Demand Metered Time-of-Use Service*; E-20—*Service to Customers with Maximum Demands of 1,000 Kilowatts or More*, and also submits a new standard electric service agreement, *Interval Meter Data Management Service Agreement (Form 79-985)*.

The changes submitted herein provide for an optional \$30.00 monthly charge to recover the actual costs, which PG&E will incur, should these smaller customers wish to subscribe to the same meter data services as provided to their larger electric customer counterparts and for those customers who established new electric service after 01-09-062 was issued.

These services are provided under contract by a third party, and PG&E's contract with that third party provides for a monthly data subscription charge of \$30.00 per participating customer site. The contract further provides that this per-site charge will remain unchanged until at least September 30, 2005. PG&E proposes to charge this same amount to those customers who wish to voluntarily pay for this service. The Commission issued an OIR on June 6, 2002, to consider metering issues and therefore the cost and treatment of this service could be modified during this proceeding.

In addition to the monthly meter data access charge, there is a one-time meter data set-up charge of \$25.00 per participating customer site. The third party provides this service to PG&E for \$25.00. PG&E proposes to charge the same amount for this service as the amount that the third party is charging PG&E.

Protests

Anyone wishing to protest this filing should do so by sending a letter via postal mail and facsimile by, **July 22, 2002**, which is 20 days after the date of this filing. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. Protests should be mailed to:

IMC Branch Chief
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Room 4002
San Francisco, California 94102
Facsimile: (415) 703-2200

Copies should also be mailed to the attention of the Director, Energy Division, Room 4005 and Jerry Royer, Energy Division, at the address shown above. It is also requested that a copy of the protest be sent via postal mail and facsimile to Pacific Gas and Electric Company on the same date it is mailed or delivered to the Commission at the address shown below.

Pacific Gas and Electric Company
Attention: Les Guliasi
Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-7226

Effective Date

In accordance with D. 01-09-062, Ordering Paragraph 3, PG&E requests that this supplemental advice filing become effective **March 27, 2002**, which was the original requested effected date of Advice 2197-E.

Notice

In accordance with General Order 96-A, Section III, Paragraph G, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list, and the service list parties for A. 00-11-056. Address changes should be directed to Rose Abao (415) 973-2218. Advice letter filings can also be accessed electronically at:

http://www.pge.com/customer_services/business/tariffs/

Vice President - Regulatory Relations

Attachments

cc: Service List – A. 00-11-056