October 24, 2006

Advice Letter 2744-G/2861-E
2744-G-A/2861-E-A

Rose de la Torre
Pacific Gas & Electric
77 Beale Street, Room 1088
Mail Code B10C
San Francisco, CA 94105

Subject: Request for authority to commence a credit card option pilot program for a 12 month period

Dear Ms de la Torre:

Advice Letter 2744-G/2861-E and 2744-G-A/2861-E-A is effective October 6, 2006 by Resolution G-3390. A copy of the advice letter is returned herewith for your records.

Sincerely,

Sean H. Gallagher, Director
Energy Division
September 12, 2006

Advice 2744-G-A/2861-E-A
(Pacific Gas and Electric Company ID U39 M)

Public Utilities Commission of the State of California

Subject: Supplement -- Modify Credit Card Pilot Program Memorandum Account and Rule 9 Language

Pacific Gas and Electric Company (PG&E) hereby submits this supplemental filing to Advice 2744-G/2861-E in compliance with Resolution G-3390 to revise PG&E’s Credit Card Pilot Memorandum Accounts (CCPPMA) E, (Gas) EG (Electric) and PG&E’s Rule 9. The affected tariff sheets are listed on the enclosed revised Attachment I. This supplemental advice filing only supersedes Advice 2744-G/2861-E as to Preliminary Statement Memorandum Account E, EG and PG&E’s Rule 9 (gas and electric).

Purpose

Ordering paragraph (OP) 3 of Resolution G-3390 orders PG&E to file a supplemental advice letter within five days from the date of the resolution to “revise the CCPPMA to indicate that PG&E shall seek authorization from the Commission to recover any program costs.” PG&E has added proposed language to Preliminary Statement E and Preliminary Statement EG so that the cost/savings analysis of the pilot program do not include any infrastructure or one-time costs so as not to ‘skew’ PG&E’s cost/savings analysis over the course of the program.

Page 6 of Resolution G-3390 directs PG&E to:

…Take out language that states that it will make a credit and debit entry on a semi-annual basis to transfer all or part of the balance in the CCPPMA to the Distribution Revenue Adjustment Mechanism (DRAM), or its successor account, as approved by Commission decision. PG&E is directed not to transfer the balance in the CCPPMA until the Commission has reviewed
and approved the pilot program costs for recovery upon the conclusion of
the 12-month pilot program.

With this supplemental filing, PG&E has withdrawn this language from the
CCPPMA (gas and electric), as directed by the Energy Division. PG&E intends to
file its report after the 12-month pilot program and request to recover program
costs in the CCPPMA in an application to the Commission.

In accordance with Resolution G-3390, PG&E is filing revised language for
Preliminary Statement E, Preliminary Statement EG and Rule 9(E)(5)(b) (gas and
electric) to include language for personal credit card use for customers utilizing the
pilot credit card program.

Additionally, PG&E requests that over the course of the pilot program the
Commission take into account the increasing percentage of customers signing up
for the recurring billing payment option. This option will be significantly cheaper
than the one-time payment credit card option based on several factors including
the elimination of a paper bill and the costs saved by avoiding stamps from
PG&E’s end and the customer’s end. PG&E urges the Commission to take this
into consideration when it evaluates the costs and savings of the program. If, as
PG&E expects, the number of customer signing up for the recurring payment
option grows each month, PG&E feels that this trend should be incorporated into
the measurement of the success of the pilot program.

**Tariff Changes**

**Preliminary Statements**

The Preliminary Statement language being modified for infrastructure and one-
time costs states:

"In compliance with Resolution G-3390, PG&E will not include any and all
infrastructure and one-time costs in the analysis of the costs and savings
associated with this pilot program at the end of the 12 month period."

Preliminary Statement language being modified to accommodate personal credit
cards now reads:

"The CCPPMA shall initially apply to all residential customers who use an
approved personal credit card, but may be open over the course of the
pilot to one or more additional class of customers utilizing an approved
personal credit card."
The Rule 9(E)(5)(b) language being modified to accommodate personal credit cards now reads:

“All credit card payment options will initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card.”

With this filing PG&E proposes to supersede its Rule 9 tariffs and Preliminary Statements E and EG that were submitted in Advice 2744-G/2861-E.

**Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than October 2, 2006, which is **20 days** after the date of this filing.

CPUC Energy Division  
Attention: Tariff Unit, 4<sup>th</sup> Floor  
505 Van Ness Avenue  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: jjr@cpuc.ca.gov and jnj@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:

Pacific Gas and Electric Company  
Attention: Brian Cherry  
Vice President, Regulatory Relations  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177  
Facsimile: (415) 973-7226  
E-mail: PGETariffs@pge.com

**Effective Date**

PG&E requests that this advice filing become effective as soon as possible.
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. Address changes should be directed to Rose de la Torre at (415) 973-4716. Advice letter filings can also be accessed electronically at: http://www.pge.com/tariffs

Vice President -- Regulatory Relations

Attachment 1 -- Tariff Sheets
Attachment 2 -- Credit Card Service List

cc: Service List – Credit Card Service List
    Kevin Coughlin – CPUC
    Karl Bemesdefer – CPUC
    Gurbux Kahlon – CPUC
    Maurice Monson - CPUC
    Kerrie Evans - CPUC
Company name/CPUC Utility No. Pacific Gas and Electric Company U39M

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<tr>
<th>Utility type:</th>
<th>Contact Person: David Poster</th>
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<tr>
<td>☒ ELC ☒ GAS</td>
<td>Phone #: (415) 973-1082</td>
</tr>
<tr>
<td>☐ PLC ☐ HEAT ☐ WATER</td>
<td>E-mail: <a href="mailto:dxpu@pge.com">dxpu@pge.com</a></td>
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**EXPLANATION OF UTILITY TYPE**

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Advice Letter (AL) #: 2744-G-A/2861-E-A

Subject of AL: Supplement -- Modify Credit Card Pilot Program Memorandum Account and Rule 9 Language

Keywords (choose from CPUC listing): Credit Card Payments

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution: G-3390

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Resolution Required? ☐ Yes ☒ No

Requested effective date: As soon as possible.

No. of tariff sheets: 12

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:

Protests 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
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
jjr@cpuc.ca.gov and jnj@cpuc.ca.gov
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<td>Preliminary Statement Part E (Cont.)</td>
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<td>25356-E</td>
<td>Table of Contents -- Rules</td>
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</table>
E. Credit Card Pilot Program Memorandum Account - Gas (CCPPMA-G)

1. PURPOSE:

The purpose of the CCPPMA-G is to track the gas portion of the savings and costs related to the Commission’s authorization to commence a pilot credit card payment option for PG&E's customers. Once the pilot program has concluded, the Commission will determine if the savings and costs are cost-neutral or not. If the savings outweigh the costs, the costs and savings are roughly equal, or the Commission, for public policy reasons and in accordance with the legislation (AB 746), determines that the benefits justify a continuation of the program; PG&E will begin full implementation of the credit card program, as authorized by a Commission Decision. If the costs outweigh the savings and the program is not consistent with the legislative objectives, the pilot program will sunset on the date of the Commission Decision.

2. APPLICABILITY:

The CCPPMA-G shall initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card.

3. REVISION DATE:

Disposition of the amounts in this account shall be determined in the Annual Gas True-up of Balancing Accounts advice filing, or as otherwise authorized by the Commission.

4. CCPPMA RATES:

The CCPPMA does not have a rate component.

5. ACCOUNTING PROCEDURE:

PG&E will not transfer all or a portion of the balance in the CCPPMA-G to other accounts for future rate recovery until the Commission has reviewed and approved the pilot program costs for recovery upon the conclusion of the 12-month pilot program. Debits and credits of the CCPPMA-G include the following categories:

a. A credit equal to the gas portion of the estimated savings based on:

1) The migration of payments from some higher cost payment channels to lower cost payment channels.

2) Avoided check processing fees for those customers who pay by credit card that statistically would have paid by check.

3) Customers signing up for PG&E’s paperless billing option, e-Bills, will avoid costs associated with paper billing, including postage.

4) Avoided postage costs, and/or mileage costs to a payment center which PG&E will attempt to quantify during the course of this pilot program.
PRELIMINARY STATEMENT
(Continued)

E. Credit Card Pilot Program Memorandum Account – Gas (CCPPMA-G)

5. ACCOUNTING PROCEDURE: (Cont’d.)

b. A debit equal to the gas portion of charges from:

1) The potential for payments to migrate from lower cost options.

2) Transaction fees charged by the credit card company and the third-party processor.

3) Potential charges associated with investigation and reversal of credit card payments.

4) System costs associated with installation and maintenance of any necessary infrastructure and training to support credit card payments.

c. In compliance with Resolution G-3390, PG&E will propose in its report on the pilot program, at the end of the 12-month period, how any long-term, one-time costs associated with installation and maintenance of infrastructure and training should be treated in comparison with savings. Such a comparison will help facilitate the decision on whether to continue with the credit card program.

(N)

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(N)

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d. An entry equal to interest on the average balance in the CCPPMA-G at the beginning of the month and the balance in the account after entries E.5.a and E.5.b above, at a rate equal to one-twelth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15. or its successor.
RULE 9—RENDERING AND PAYMENT OF BILLS
(Continued)

E. BILLs DUE ON PRESENTATION

Bills for gas service are due and payable upon presentation. Payments shall be received at the address imprinted on the payment stub attached to PG&E’s bill, a business office of PG&E, or by an authorized agent of PG&E. Payments shall be made using the following options:

1. Cash, check, money order, or

2. Electronic data interchange (EDI) for commercial customers or recurring automatic bank debit (Wherein the customer requests the automatic monthly withdrawal of payment for utility services from a designated checking/banking account), or

3. Debit card by phone service or an electronic funds transfer the customer initiates through a third party (A transfer or transaction fee over and above the PG&E bill amount may be charged to the customer by a third-party vendor for these services), or

4. Electronic billing as defined in Rule 1, or

5. a. By other means mutually agreeable to PG&E and the customer.

   b. A credit card option, on a pilot basis, will be available to customers (1) through a third-party operated pay-by-phone service, which would be available either through a call to PG&E’s customer service line or at PG&E’s local office; (2) through certain incoming and outgoing calls to or from PG&E; and (3) through PG&E online. Each of these options includes both one-time payments and a recurring billing payment option. Options (1) and (2) are contingent upon the PG&E customer submitting a valid email address and expressly agreeing via email to the suppression of all future paper bills in a manner consistent with the requirements of Rule 9 (L). If a customer opts for a recurring billing payment under option (3), all future paper bills will also be suppressed in accordance with Rule 9 (L). All credit card payment options will initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card. This program will either continue indefinitely, continue as modified by PG&E or Commission decision, or be terminated by PG&E or the Commission decision rendered at the conclusion of the pilot program.
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Issued by Brian K. Cherry
Vice President Regulatory Relations
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Effective
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EG. Credit Card Pilot Program Memorandum Account – Electric (CCPPMA-E)

1. PURPOSE:

The purpose of the CCPPMA-E is to track the electric portion of the savings and costs related to the Commission’s authorization to commence a pilot credit card payment option for PG&E’s customers. Once the pilot program has concluded, the Commission will determine if the savings and costs are cost-neutral or not. If the savings outweigh the costs, the costs and savings are roughly equal, or the Commission, for public policy reasons and in accordance with the legislation (AB 746), determines that the benefits justify a continuation of the program; PG&E will begin full implementation of the credit card program, as authorized by a Commission Decision. If the costs outweigh the savings and the program is not consistent with the legislative objectives, the pilot program will sunset on the date of the Commission Decision.

2. APPLICABILITY:

The CCPPMA shall initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card.

3. REVISION DATE:

Disposition of the amounts in this account shall be determined in the Annual Electric True-up Proceeding or other proceeding authorized by the Commission.

4. CCPPMA RATES:

The CCPPMA does not have a rate component.

5. ACCOUNTING PROCEDURE:

PG&E will not transfer all or a portion of the balance in the CCPPMA-E to the Distribution Revenue Adjustment Mechanism (DRAM) or its successor account for future rate recovery until the Commission has reviewed and approved the pilot program costs for recovery upon the conclusion of the 12-month pilot program. Incremental debits and credits of the CCPPMA-E include the following categories:

a. A credit equal to the electric portion of estimated savings based on:

1) The migration of payments from some higher cost payment channels to lower cost payment channels.

2) Avoided check processing fees for those customers who pay by credit card that statistically would have paid by check.

3) Customers signing up for PG&E’s paperless billing option, e-Bills, will avoid costs associated with paper billing, including postage.

4) Avoided postage costs, and/or mileage costs to a payment center which PG&E will attempt to quantify during the course of this pilot program.
5. ACCOUNTING PROCEDURE: (Cont'd.)

b. A debit equal to the electric portion of charges from:
   1) The potential for payments to migrate from lower cost options.
   2) Transaction fees charged by the credit card company and the third-party processor.
   3) Potential charges associated with investigation and reversal of credit card payments.
   4) System costs associated with installation and maintenance of any necessary infrastructure and training to support credit card payments.

c. In compliance with Resolution G-3390, PG&E will propose in its report on the pilot program, at the end of the 12-month period, how any long-term, one-time costs associated with installation and maintenance of infrastructure and training should be treated in comparison with savings. Such a comparison will help facilitate the decision on whether to continue with the credit card program.

(N)

(N)

(N)

(N)

(d. An entry equal to interest on the average balance in the CCPPMA-E at the beginning of the month and the balance in the account after entries EG.5.a and EG.5.b above, at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15. or its successor.
RULE 9—RENDERING AND PAYMENT OF BILLS
(Continued)

E. BILLS DUE ON PRESENTATION

Bills for electric service are due and payable upon presentation. Payments shall be received at the address imprinted on the payment stub attached to PG&E’s bill, a business office of PG&E, or by an authorized agent of PG&E. Payments shall be made using the following options:

1. Cash, check, money order, or

2. Electronic data interchange (EDI) for commercial customers or recurring automatic bank debit (Wherein the customer requests the automatic monthly withdrawal of payment for utility services from a designated checking/banking account), or

3. Debit card by phone service or an electronic funds transfer the customer initiates through a third party (A transfer or transaction fee over and above the PG&E bill amount may be charged to the customer by a third-party vendor for these services), or

4. Electronic billing as defined in Rule 1, or

5. a. By other means mutually agreeable to PG&E and the customer.

   b. A credit card option, on a pilot basis, will be available to customers (1) through a third-party operated pay-by-phone service, which would be available either through a call to PG&E’s customer service line or at PG&E’s local office; (2) through certain incoming and outgoing calls to or from PG&E; and (3) through PG&E online. Each of these options includes both one-time payments and a recurring billing payment option. Options (1) and (2) are contingent upon the PG&E customer submitting a valid email address and expressly agreeing via email to the suppression of all future paper bills in a manner consistent with the requirements of Rule 9 (L). If a customer opts for a recurring billing payment under option (3), all future paper bills will also be suppressed in accordance with Rule 9 (L). All credit card payment options will initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card. This program will either continue indefinitely, continue as modified by PG&E or Commission decision, or be terminated by PG&E or the Commission decision rendered at the conclusion of the pilot program.

If a Customer makes only partial payment on a bill, the partial payment received will be allocated among the following components of the bill in proportion to the amount owed on each (utility users taxes will be treated in accordance with current utility procedures and are not subject to this section). The bill components include PG&E charges, FTA charges, CTC charges, and other energy-related charges. Customer failure to pay any of the components set forth herein will be subject to service termination as set forth in Rule 11.
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<td>Community Choice Aggregation Service Switching Exemption Rules ..............</td>
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</tr>
</tbody>
</table>

(Continued)
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General Order 96-A, Section III(G)

ABAG Power Pool
Accent Energy
Agleta Consumer Alliance
Agnews Developmental Center
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Alcantar & Elsesser
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City of Palo Alto
City of Redding
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Crossborder Inc
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Defense Fuel Support Center
Department of the Army
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House, Lon
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IUCG/Sunshine Design LLC
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Luce, Forward, Hamilton & Scripps
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Marcus, David
Matthew V. Brady & Associates
Maynor, Donald H.
McKenzie & Assoc
McKenzie & Associates
Meek, Daniel W.
Mirant California, LLC
Modesto Irrigation Dist
Morrison & Foerster
Morse Richard Weisenmiller & Assoc.
Navigant Consulting
New United Motor Mfg, Inc
Norris & Wong Associates
North Coast Solar Resources
Northern California Power Agency
Office of Energy Assessments
OnGrid Solar
Palo Alto Muni Utilities
PG&E National Energy Group
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PITCO
Plurimi, Inc.
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Price, Roy
Product Development Dept
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RMC Lonestar
Sacramento Municipal Utility District
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Sempra Energy
Sequoia Union HS Dist
SESCO
Sierra Pacific Power Company
Silicon Valley Power
Smurfit Stone Container Corp
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SPURR
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Sutherland, Asbill & Brennan
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