November 4, 2014

Advice Letter: 3912-E-A

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

SUBJECT: RULE 18 REVISIONS IN COMPLIANCE WITH RESOLUTION E-4419

Dear Ms. Allen:

Advice Letter 3912-E-A is effective as of September 17, 2014.

Sincerely,

Edward Randolph
Director, Energy Division
September 17, 2014

Advice 3912-E-A
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Rule 18 Revisions in Compliance With Resolution E-4419

Purpose

The purpose of this supplemental advice letter is to ensure that Pacific Gas and Electric Company’s (PG&E) Electric Rule 18 – Supply to Separate Premises and Submetering of Electric Energy, is in compliance with Ordering Paragraph (OP) 4 of the California Public Utilities Commission (CPUC or Commission) Resolution E-4419. PG&E would like to submit the attached Electric Rule 18 revisions for Commission approval.

Background

On November 19, 2011, Southern California Edison (SCE) filed interim tariff changes to implement provisions of Decision (D.) 10-07-044 (Decision in Phase 1 of the Commission’s Plug-In Electric Vehicle Rulemaking R.09-08-009).

On September 8, 2011, the Commission issued Resolution E-4419 approving in part and denying in part SCE’s proposed tariff changes as filed in Advice Letter 2528-E. The Resolution approved a narrower revision to SCE’s existing Rule 18.

In Resolution E-4419, OP 4, the Commission also directed PG&E to file a Tier 1 advice letter “requesting similar revisions to…Rule 18…” within 30 days of the effective date of the Resolution.

On September 26, 2011, PG&E filed Advice 3912-E in compliance with OP 4 of CPUC Resolution E-4419. In Advice 3912-E, PG&E stated:

“PG&E’s Electric Rule 18 is dissimilar to SCE’s Electric Rule 18 in that it does not currently contain the language found at the beginning of SCE’s Electric Rule 18 Section E:

“Use by Others. A customer shall not charge for electricity received from SCE and used by another person, except…”
Because PG&E’s tariff is constructed such that there is no express prohibition (with certain exceptions) on a customer charging for electricity received from PG&E and used by another person, PG&E believes that PG&E’s existing Rule 18 is in compliance with Resolution E-4419 and therefore no changes are necessary.

On August 29, 2014, PG&E and CPUC staff held a conference call to discuss further revisions to PG&E’s Electric Rule 18. Based on the discussion, PG&E proposes to further revise Electric Rule 18 in compliance with Commission Resolution E-4419 and proposes to use Public Utilities Code 216(i) as the basis for the tariff revision.

**Tariff Revision**

Add Section 6 (Electric Vehicles) to Electric Rule 18.C (Furnishing and Metering of Electricity):

6. Electric Vehicles

As provided by Public Utilities Code Section 216(i), a customer who owns, controls, operates or manages a facility that supplies electricity to the public only for use to charge light duty plug-in electric vehicles is not a public utility and therefore may resell electricity without regard to this Rule. Such resale of electricity for electric vehicle charging does not affect the Commission’s authority under Public Utilities Code Sections 454, 740.2, or any other applicable statute.

The filing would 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 October 7, 2014, 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 upon filing.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.09-08-009. 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/.

Meredith Allen / KHC

Senior Director, Regulatory Relations

Attachments

cc: Service List R.09-08-009
Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 E)**

<table>
<thead>
<tr>
<th>Utility type:</th>
<th>Contact Person: Kingsley Cheng</th>
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</thead>
<tbody>
<tr>
<td>☑ ELC ☐ GAS</td>
<td>Phone #: (415) 973-5265</td>
</tr>
<tr>
<td>☐ PLC ☐ HEAT ☐ WATER</td>
<td>E-mail: <a href="mailto:k2c0@pge.com">k2c0@pge.com</a> and <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
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**EXPLANATION OF UTILITY TYPE**

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</table>

**Advice Letter (AL) #: 3912-E-A**

**Tier:** 1

**Subject of AL:** **Supplemental: Rule 18 Revisions in Compliance With Resolution E-4419**

**Keywords (choose from CPUC listing):** Compliance, Rules

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-4419

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:** September 17, 2014

**No. of tariff sheets:** 3

**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: Electric Rule 18, SUPPLY TO SEPARATE PREMISES AND SUBMETERING OF ELECTRIC ENERGY

Service affected and changes proposed: Section 6 (Electric Vehicles) to Electric Rule 18.C (Furnishing and Metering of Electricity). See “Tariff Revision” section in advice letter.

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: Meredith Allen**

**Senior Director, Regulatory Relations**

77 Beale Street, Mail Code B10C
San Francisco, CA 94177

E-mail: PGETariffs@pge.com
<table>
<thead>
<tr>
<th>Cal P.U.C. Sheet No.</th>
<th>Title of Sheet</th>
<th>Cancelling Cal P.U.C. Sheet No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>34380-E</td>
<td>ELECTRIC RULE NO. 18 SUPPLY TO SEPARATE PREMISES AND SUBMETERING OF ELECTRIC ENERGY Sheet 5</td>
<td>28911-E</td>
</tr>
<tr>
<td>34381-E</td>
<td>ELECTRIC TABLE OF CONTENTS Sheet 1</td>
<td>34365-E</td>
</tr>
<tr>
<td>34382-E</td>
<td>ELECTRIC TABLE OF CONTENTS RULES Sheet 20</td>
<td>34361-E</td>
</tr>
</tbody>
</table>
C. FURNISHING AND METERING OF ELECTRICITY (Cont'd.)

6. ELECTRIC VEHICLES

As provided by Public Utilities Code Section 216(i), a customer who owns, controls, operates or manages a facility that supplies electricity to the public only for use to charge light duty plug-in electric vehicles is not a public utility and therefore may resell electricity without regard to this Rule. Such resale of electricity for electric vehicle charging does not affect the Commission’s authority under Public Utilities Code Sections 454, 740.2, or any other applicable statute.

D. TESTING OF SUBMETERS

As a condition of service for submetering, where electric energy is furnished in accordance with Paragraphs C.1., C.2., C.3, and C.4. above, customers using submeters as a basis for charges for electricity shall submit to PG&E certification by a meter testing laboratory, satisfactory to PG&E, as to the accuracy of the submeters upon initial installation of such submeters, or for existing submeters upon request of PG&E. As a further condition of service for submetering, the customer shall agree that he will be governed by PG&E’s Rule 17, Meter Tests and Adjustment of Bills for Meter Error, with the exception that the word "subcustomer" be substituted for "customer" and the words "Utility's customer" be substituted for "Company." As a further condition of service for submetering, the customer shall agree that PG&E may inspect and examine customer’s billing procedures from time to time to determine that such service is made in accordance with this rule or as otherwise may be authorized by the Commission.

E. In the event such energy is furnished or resold otherwise than as provided for above, PG&E may either discontinue service to the customer or, where feasible, furnish electric energy directly to the subcustomer in accordance with PG&E’s tariff on file with the Commission.
ELECTRIC TABLE OF CONTENTS

TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>SCHEDULE</th>
<th>TITLE OF SHEET</th>
<th>CAL P.U.C. SHEET NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title Page</td>
<td></td>
<td>34381-E (T)</td>
</tr>
<tr>
<td>Rate Schedules</td>
<td></td>
<td>33833,33834,34275,34349,34276,34277,32705,31541,34276-E</td>
</tr>
<tr>
<td>Preliminary Statements</td>
<td></td>
<td>33840,32706,30376,34343,34357,34358,34359,34366-E</td>
</tr>
<tr>
<td>Rules</td>
<td></td>
<td>34360,34382,34339-E (T)</td>
</tr>
<tr>
<td>Maps, Contracts and Deviations</td>
<td></td>
<td>33253-E</td>
</tr>
<tr>
<td>Sample Forms</td>
<td></td>
<td>32777,32429,32726,33726,32504,33654,33209,32506,34256,32437,32508,32439-E</td>
</tr>
</tbody>
</table>

(Continued)
### ELECTRIC TABLE OF CONTENTS

#### RULES

<table>
<thead>
<tr>
<th>Rule</th>
<th>TITLE OF SHEET</th>
<th>CAL P.U.C. SHEET NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rule 11</td>
<td>Discontinuance and Restoration of Service</td>
<td>13140,34203*,13142,13143, 27802,23967,13146,13147,13148,13149,13150,34204,34355,31438-E</td>
</tr>
<tr>
<td>Rule 12</td>
<td>Rates and Optional Rates</td>
<td>16872,27804,32077-E</td>
</tr>
<tr>
<td>Rule 13</td>
<td>Temporary Service</td>
<td>22472-E</td>
</tr>
<tr>
<td>Rule 14</td>
<td>Shortage of Supply and Interruption of Delivery</td>
<td>19762,15527-E</td>
</tr>
<tr>
<td>Rule 15</td>
<td>Distribution Line Extensions</td>
<td>20093,20094,15577,27072,28253,17851,30664,27074,15583,20095,21553-21555,15588,17856,30665,15591,27076,15593-E</td>
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<tr>
<td>Rule 16</td>
<td>Service Extensions</td>
<td>20096,15595,14880-14881,15596-15598,16987,15600,15601-15608,14254,13775,15609,15610-E</td>
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<tr>
<td>Rule 17</td>
<td>Meter Tests and Adjustment of Bills for Meter Error</td>
<td>20099,29723,29955,25149-E</td>
</tr>
<tr>
<td>Rule 17.1</td>
<td>Adjustment of Bills for Billing Error</td>
<td>33679,29724-E</td>
</tr>
<tr>
<td>Rule 17.2</td>
<td>Adjustment of Bills for Unauthorized Use</td>
<td>22707,12056,12057,12058-E</td>
</tr>
<tr>
<td>Rule 18</td>
<td>Supply to Separate Premises and Submetering of Electric Energy</td>
<td>14329*,27037,29056,28910,34380-E</td>
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<tr>
<td>Rule 19</td>
<td>Medical Baseline Quantities</td>
<td>18974,18975,18976-E</td>
</tr>
<tr>
<td>Rule 19.1</td>
<td>California Alternate Rates for Energy for Individual Customers and Submetered Tenants of Master-Metered Customers</td>
<td>32654,32223,29291-E</td>
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<tr>
<td>Rule 19.2</td>
<td>California Alternate Rates for Energy for Nonprofit Group-Living Facilities</td>
<td>25729,33224,13589,32658,32659-E</td>
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<tr>
<td>Rule 19.3</td>
<td>California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities</td>
<td>25153,33225,32661,27807-E</td>
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</tbody>
</table>

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

AT&T
Alcantar & Kahl LLP
Anderson & Poole
BART
Barkovich & Yap, Inc.
Bartle Wells Associates
Braun Blasing McLaughlin, P.C.

CENERGY POWER
California Cotton Ginners & Growers Assn
California Energy Commission
California Public Utilities Commission
California State Association of Counties
Calpine
Casner, Steve
Center for Biological Diversity
City of Palo Alto
City of San Jose
Clean Power
Coast Economic Consulting
Commercial Energy
Cool Earth Solar, Inc.
County of Tehama - Department of Public Works
Crossborder Energy
Davis Wright Tremaine LLP
Day Carter Murphy
Defense Energy Support Center
Dept of General Services

Division of Ratepayer Advocates

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Downey & Brand
Ellison Schneider & Harris LLP
G. A. Krause & Assoc.
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GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Power Institute
Hanna & Morton
In House Energy
International Power Technology
Intestate Gas Services, Inc.
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Kelly Group
Linde
Los Angeles County Integrated Waste Management Task Force
Los Angeles Dept of Water & Power
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Marin Energy Authority
McKenna Long & Aldridge LLP
McKenzie & Associates
Modesto Irrigation District
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NRG Solar
Nexant, Inc.
North America Power Partners
Occidental Energy Marketing, Inc.
OnGrid Solar
Pacific Gas and Electric Company
Praxair
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
SCE
SDG&E and SoCalGas
SPURR
San Francisco Public Utilities Commission
Seattle City Light
Sempra Utilities
SoCalGas
Southern California Edison Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
Tiger Natural Gas, Inc.
TransCanada
Utility Cost Management
Utility Power Solutions
Utility Specialists
Verizon
Water and Energy Consulting
Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)