

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 25, 2014

**Advice Letter 3429-G/4311-E**

Brian Cherry  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177

**SUBJECT: JOINT FILING PG&E, SDG&E, SCE, SoCALGAS - LOW INCOME CUSTOMER  
DATA SHARING WITH WATER UTILITIES**

Dear Mr. Cherry:

Advice Letters 3429-G/4311-E is effective as of December 7, 2013.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph  
Director, Energy Division



**Brian K. Cherry**  
Vice President  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415.973.7226

November 8, 2013

**Advice 3429-G/4311-E**

(Pacific Gas and Electric Company – U 39 M)

**Advice 2536-E/2238-G**

(San Diego Gas & Electric Company – U 902 M)

**Advice 4558-G**

(Southern California Gas Company – U 904 G)

**Advice 2962-E**

(Southern California Edison Company – U 338 E)

Public Utilities Commission of the State of California

**Subject: Low-Income Customer Data Sharing With Water Utilities**

Pacific Gas and Electric Company (“PG&E”), on behalf of itself, San Diego Gas & Electric Company (“SDG&E”), Southern California Gas Company (“SCG”), and Southern California Edison Company (“SCE”) (together the Investor Owned Utilities (“IOUs”)), hereby submits for filing their report on expenditures associated with low-income customer data sharing with the water utilities in compliance with Ordering Paragraph (“OP”) 129 of Decision (“D.”) 12-08-044.

**Purpose**

The purpose of this filing is to provide the California Public Utilities Commission (“Commission” or “CPUC”) with information on the IOUs costs associated with implementing low-income customer information sharing with the water utilities, as required by OP 129 of D.12-08-044, which specifically states:

Once data sharing with water Utilities begin, PG&E, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company are directed to file a Tier 2 Advice Letter, and these Tier 2 Advice Letters must report on the corresponding costs borne by the partnering water Utilities that are filed in accordance with D.11-05-020.

## **Background**

D.11-05-020 required water and energy utilities with overlapping service territories to share low-income customer information to increase the participation rates in water low-income assistance programs. It also encouraged water and energy utilities to collaborate on outreach efforts to low-income customers. Prior to D.11-05-020, SCE, PG&E, SDG&E, SCG, and Southwest Gas exchanged data for customers enrolled in income-qualified programs within their overlapping service areas to facilitate automatic enrollment. The intent of D.11-05-020 was to expand to overlapping water utilities the existing data sharing processes (secure file transfer, file format, matching methodology, opt out letter, etc.) already in place among the overlapping energy utilities.

In D.11-05-020, the IOUs were directed to anticipate incurring one-time implementation costs to establish data sharing. The IOUs were also to include the information technology ("IT") and administrative costs associated with data sharing, not already included in rates, in the low income budget contained in the program applications for 2012-2014. Likewise, the IOUs were directed to include their costs incurred in 2011 and not already included in rates to be included in the low income budget application for 2012-2014.<sup>1</sup>

D.12-08-044 directed that any on-going IT labor costs (anticipated to be small) should be included as part of the regular California Alternate Rates for Energy ("CARE") IT maintenance budget.

## **Data Sharing Implementation**

### **PG&E**

PG&E used existing systems and developed an automated IT data sharing process that was deployed in September 2012. The data sharing process between PG&E and its participating water utilities occurs every six months.

To date, the following water utilities have participated:

- California American Water
- California Water Service
- Del Oro Water
- Golden State Water

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<sup>1</sup> D.11-05-020 was issued on May 10, 2011. Ordering Paragraph 4 directed the water utilities to "file an information-only filing with a data sharing plan ... within six months of the issuance of this decision" including a copy of a memorandum of understanding/non-disclosure agreement for each participating energy utility. Ordering Paragraph 5 directed the data sharing to commence within 60 days after filing the plan. The energy utilities worked with the water utilities through mid-2012 to scope out system requirements, design system improvements, and implement the data sharing by mid-2012. The energy utilities incurred one-time development costs and implemented the data sharing prior to the issuance of D.12-08-044.

- Great Oaks Water
- San Jose Water

### SCE

SCE developed system changes to its IT systems and implemented the required data sharing in June 2012. The data exchange between SCE and its participating water utilities occurs every six months.

To date, the following water utilities have participated:

- Apple Valley Ranchos Water
- Valencia Water
- San Gabriel Valley Water
- Golden State Water
- California American Water
- Park Water
- Del Oro Water
- Suburban Water
- California Water Service

### SDG&E

SDG&E used existing systems and developed an automated IT data sharing process that was deployed in November 2012. The data sharing process between SDG&E and American Water occurs every six months, with the most recent effort being completed on September 5, 2013.

### SCG

SCG used existing systems and developed an automated IT data sharing process that was deployed in November 2011. The first data exchange started with Valencia Water in April 2012. The data sharing process between SCG and its participating water utilities currently occurs twice a year in March and October.

To date, the following water utilities have participated:

- South West/Suburban Water Systems
- California Water Service
- Golden State Water
- San Gabriel Valley Water/Fontana Water
- Apple Valley Ranchos Water
- Valencia Water
- Park Water

## **Data Sharing Costs**

### **PG&E**

PG&E incurred one-time IT development and implementation costs of \$67,345 in 2012. PG&E's one-time data sharing IT development and implementation costs were recorded against the 2012 CARE IT Programming budget. Ongoing costs for this activity will continue to be recorded as part of the CARE IT budget.

PG&E did not incur any costs associated with data sharing in 2011.

PG&E has not received corresponding cost information from the partnering water utilities at the time of this filing.

### **SCE**

SCE incurred initial one-time costs of \$193,476 for IT enhancements to develop automated processes that ensure secure transfer of data between energy and water utilities and data matching. SCE did not request recovery of the 2012 costs in its 2012-2014 application as they already had been incurred in compliance with Commission directives in D.11-05-020 and were recorded against the 2012 CARE IT budget, which was authorized initially in a bridge funding decision and subsequently in D.12-08-044. SCE estimates annual maintenance cost for this activity at \$7,700. The maintenance costs are incremental to the maintenance cost that is incurred in supporting data exchanges between the energy utilities that have been occurring for over a decade and are recorded as charges against SCE's authorized CARE IT budget beginning in 2012.

SCE requested corresponding cost information from partnering water utilities and received a response from Valencia Water Company that its corresponding cost in 2012 was \$27,308.

### **SDG&E**

SDG&E did not incur any costs associated with data sharing in 2011 and minimal cost in 2012. SDG&E used previously established processes to minimize the impact to systems and did not track the cost associated with the data sharing effort separately. SDG&E had previously identified the cost impact would be minimal and did not seek recovery of the 2012 costs in its 2012-2014 Application. All costs were allocated to the 2012 CARE IT Programming budget to cover this data sharing expense. Ongoing costs for this activity will continue to be recorded as part of the CARE IT Programming budget.

SDG&E has requested the corresponding cost information from the partnering water utility. However, the water utility did not separately track cost information for its data sharing in SDG&E's service territory.

## SCG

SCG incurred one time set up costs of approximately \$40,000 in both 2011 and 2012. These expenses are associated with IT costs necessary for the development and implementation of the water data sharing activities.

SCG requested \$290,000 in its 2012 CARE IT Programming budget in its 2012 – 2014 program Application (“A.”) 11-05-018 to cover implementation and recurring expenses. This amount was approved in D.12-08-044. Ongoing IT costs are negligible. To the extent costs are experienced they are recorded as part of the CARE IT Programming budget.

SCG has requested the corresponding cost information from its water utility partners; Valencia Water Company’s annual expenses in 2012 was \$27,308 and year-to-date 2013 is \$2,745 for operating and administering the data sharing program. San Gabriel Valley Water Utility’s expenses in 2012 were \$5,830 and attributable to the mailing, printing and translation services for the data sharing program. Golden State Water incurred administrative expenses totaling \$23,171 for 2011 and 2012 for the data sharing program. Information regarding the other water utility partners was also requested but not available to provide.

## Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **December 2, 2013**, which is 24 days<sup>2</sup> after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> 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 and the other IOUs 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:

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<sup>2</sup> The 20-day protest period concludes on a holiday. PG&E is hereby moving this date to the following business day.

**For PG&E:**

Brian K. Cherry  
Vice President, 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

**For SDG&E:**

Attn: Megan Caulson  
Regulatory Tariff Manager  
8330 Century Park Court, Room 32C  
San Diego, CA 92123-1548  
Facsimile: (858) 654-1879  
E-mail: Mcaulson@semprautilities.com

**For SCG:**

Sid Newsom  
Tariff Manager – GT14D6  
555 West 5th Street  
Los Angeles, CA 90013-1011  
Facsimile: (213) 244-4957  
E-mail: snewsom@semprautilities.com

**For SCE:**

Megan Scott-Kakures  
Vice President, Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
Rosemead, California 91770  
Facsimile: (626) 302-4829  
E-mail: AdviceTariffManager@sce.com

Leslie E. Starck  
Senior Vice President, Regulatory Policy & Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2030  
San Francisco, California 94102  
Facsimile: (415) 929-5544  
E-mail: Karyn.Gansecki@sce.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**

The Joint IOUs request that this Tier 2 advice filing become effective on the first day of the month following 30 calendar days after the date of 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 A.09-12-017, A.11-05-017, A.11-05-018, A.11-05-019, and A.11-05-020. Address changes to PG&E's General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. Address changes to the other IOUs' General Order 96-B service lists should be directed to IOUs' email addresses shown above.

For SDG&E: E-mail: MCaulson@semprautilities.com  
For SoCalGas: E-mail: snewsom@semprautilities.com  
For SCE: E-mail: AdviceTariffManager@sce.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>



Vice President, Regulatory Relations

cc: Service Lists: A.09-12-017, A.11-05-017, A.11-05-018, A.11-05-019, and A.11-05-020

# 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: Kingsley Cheng

Phone #: (415) 973-5265

E-mail: k2c0@pge.com and PGETariffs@pge.com (also see E-mails under AL "Notice" section)

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3429-G/4311-E, et al.**

Tier: **2**

Subject of AL: **Low-Income Customer Data Sharing With Water Utilities**

Keywords (choose from CPUC listing): Compliance

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.12-08-044

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: **The first day of the month following 30 calendar days after the date of filing**      No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 24 days<sup>1</sup> 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., 4<sup>th</sup> Flr.**  
**San Francisco, CA 94102**  
**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**  
**Attn: Brian K. Cherry**  
**Vice President, Regulatory Relations**  
**77 Beale Street, Mail Code B10C**  
**P.O. Box 770000**  
**San Francisco, CA 94177**  
**E-mail: PGETariffs@pge.com**

<sup>1</sup> The 20-day protest period concludes on a holiday. PG&E is hereby moving this date to the following business day.

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

1st Light Energy	Douglass & Liddell	OnGrid Solar
AT&T	Downey & Brand	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Praxair
Anderson & Poole	G. A. Krause & Assoc.	Regulatory & Cogeneration Service, Inc.
BART	GenOn Energy Inc.	SCD Energy Solutions
Barkovich & Yap, Inc.	GenOn Energy, Inc.	SCE
Bartle Wells Associates	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Braun Blaising McLaughlin, P.C.	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Public Utilities Commission
California Energy Commission	In House Energy	Seattle City Light
California Public Utilities Commission	International Power Technology	Sempra Utilities
California State Association of Counties	Intestate Gas Services, Inc.	SoCalGas
Calpine	K&L Gates LLP	Southern California Edison Company
Casner, Steve	Kelly Group	Spark Energy
Cenergy Power	Linde	Sun Light & Power
Center for Biological Diversity	Los Angeles Dept of Water & Power	Sunshine Design
City of Palo Alto	MRW & Associates	Tecogen, Inc.
City of San Jose	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Clean Power	Marin Energy Authority	TransCanada
Coast Economic Consulting	McKenna Long & Aldridge LLP	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
County of Tehama - Department of Public Works	Modesto Irrigation District	Utility Specialists
Crossborder Energy	Morgan Stanley	Verizon
Davis Wright Tremaine LLP	NLine Energy, Inc.	Water and Energy Consulting
Day Carter Murphy	NRG Solar	Wellhead Electric Company
Defense Energy Support Center	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	North America Power Partners	
Division of Ratepayer Advocates	Occidental Energy Marketing, Inc.	