

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 28, 2014

Advice Letter 4347-E

Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**Subject: Request Funding to Implement Line Item Billing for Marin Clean
Energy's Energy Efficiency Financing Pilots Approved in D.12-11-015**

Dear Mr. Cherry:

Advice Letters 4347-E is effective February 27, 2014.

Sincerely,

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

Edward F. Randolph, Director
Energy Division



January 29, 2014

Advice 4347-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Request Funding to Implement Line Item Billing for Marin Clean Energy's Energy Efficiency Financing Pilots Approved in Decision 12-11-015

Purpose

This Advice Letter (AL) requests the use of funds authorized for pilots approved in *Decision Approving 2013-2014 Energy Efficiency (EE) Financing Pilot Programs*, Decision (D). 13-09-044. The funds are requested for billing system upgrades that will allow Pacific Gas and Electric Company (PG&E) to bill Marin Clean Energy's (MCE's) On Bill Repayment (OBR) charges to PG&E customers participating in MCE's OBR financing pilots approved in D.12-11-015.¹ The requested funds will be used for required information technology (IT) programming that was not funded in D.12-11-015.

Background

PG&E provides billing service for MCE's community choice aggregation (CCA) charges pursuant to Electric Rule 23 and a Community Choice Aggregator Service Agreement. The current billing arrangement is only for customers within the MCE service territory who did not opt out of MCE CCA service.

In D.12-11-015, the Commission authorized MCE to implement a suite of energy efficiency pilots with any electric customer within its jurisdiction, including two OBR finance pilots (the MCE OBR pilots).² The decision requires PG&E to include in its bills charges for the MCE OBR pilots.³ On October 8, 2013, PG&E and MCE executed an agreement under which PG&E will include in its bills charges for the

¹ *Decision Approving 2013-2014 Energy Efficiency Programs and Budgets*, D.12-11-015 (Nov. 15, 2012).

² See also Energy Division disposition letter dated June 10, 2013, approving AL MEA-003-CCA and AL MEA-005-CCA, filed pursuant to D.12-11-015.

³ D.12-11-015, pp. 49-50.

MCE OBR pilots for MCE CCA customers. Pursuant to this agreement, PG&E will include MCE OBR pilot charges for CCA customers on the MCE CCA page in PG&E's bills.

D.12-11-015 referenced the current billing service PG&E provides for MCE's CCA customers pursuant to Electric Rule 23,⁴ but did not address the implementation of MCE's OBR pilots for non-CCA customers or anticipate costs to adjust PG&E's billing system to collect MCE OBR charges from non-CCA customers. However, the Commission's Energy Division subsequently informed PG&E and MCE that the Commission's intention in D.12-11-015 was to require PG&E to provide billing service for the MCE OBR pilots for all customers in MCE's service territory, including those who opted out of CCA service and are not billed by PG&E for MCE pursuant to Electric Rule 23.

MCE estimates that up to 150 non-CCA customers may participate in MCE's OBR pilots.⁵ Since these customers are not billed for CCA charges under Electric Rule 23, PG&E must make IT infrastructure changes for the limited purpose of billing MCE's OBR pilot charges for non-CCA customers.

On September 20, 2013, the Commission issued D.13-09-044, which approved the investor-owned utilities' (IOUs') statewide finance pilots, including funding for the IOUs' required IT updates to allow the IOUs to bill for third-party loan charges. D.13-09-044 requires the IOUs to file an AL after the California Alternative Energy and Advanced Transportation Financing Authority contracts with a master servicer. That AL will support an updated cost estimate of the IT changes necessary for the IOUs to implement OBR and other features of the authorized pilots.⁶ If the CPUC approves PG&E's funding request in this AL, PG&E will include the one-time costs to implement OBR for MCE in its cost estimates of IT changes necessary for the statewide OBR pilots.

Funding Request

PG&E requests to use up to a maximum of \$100,000 of the IT budget approved for PG&E's statewide finance pilots in D.13-09-044⁷ to make IT updates needed to bill loan charges for PG&E customers who have opted out of receiving CCA service but elect to participate in MCE's OBR pilots. The amount requested is based on PG&E's

⁴ D.12-11-015, p. 49.

⁵ This estimate is provided directly from MCE and has not been reviewed by PG&E.

⁶ See D.13-09-044, OP17.

⁷ See *Proposed Statewide Financing Pilot Budget Guidelines* table on pg. 95, line 6b of D.13-09-044.

initial estimate of the cost to add MCE as a vendor (approximately \$50,000), other setup costs to include MCE loan charges for non-CCA customers on PG&E's bill under the "Other Program and Service Charges" page, and a contingency for any unforeseen costs. PG&E will charge to this project only actual costs for the one-time changes needed to perform this service. The loan charges for non-CCA customers will not appear on the MCE CCA bill page, but rather, will appear on another portion of the PG&E bill. This will be the only billing functionality PG&E will develop to bill non-CCA customers for the MCE OBR pilots. PG&E has scheduled the IT work associated with this request and will begin work upon approval of this AL. PG&E will need additional IT development to implement PG&E's EE Finance pilot programs approved in D.13-09-044.

In addition, PG&E requests authority to collect from MCE the same fee per bill that that MCE pays to PG&E for CCA billing, as approved by the Commission. This fee is not intended to reimburse costs from this implementation nor does it represent the actual incremental costs of providing this billing service.

This AL is solely to comply with and implement D.12-11-015. PG&E will not offer the same terms or conditions of billing to any other vendors or service providers.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **February 18, 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:

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

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 2 advice filing become effective on regular notice, **February 28, 2014**, which is **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 2013-2014 EE Portfolio Application, A.12-07-001 et. al. 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>.



Vice President, Regulatory Relations

Attachments

cc: Service List A.12-07-001, et. al.

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 E)**

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) #: **4347-E**

Tier: **2**

Subject of AL: **Request Funding to Implement Line Item Billing for Marin Clean Energy's Energy Efficiency Financing Pilots Approved in Decision 12-11-015**

Keywords (choose from CPUC listing): **Energy Efficiency**

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: **D.12-11-015**

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: **February 28, 2014**

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:

Service affected and changes proposed:

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
ED Tariff Unit
505 Van Ness Ave., 4th Floor
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

**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 Blasing McLaughlin, P.C.	Green Power Institute	SPURR
CENERGY POWER	Hanna & Morton	San Francisco Public Utilities Commission
California Cotton Ginners & Growers Assn	In House Energy	Seattle City Light
California Energy Commission	International Power Technology	Sempra Utilities
California Public Utilities Commission	Intestate Gas Services, Inc.	SoCalGas
California State Association of Counties	K&L Gates LLP	Southern California Edison Company
Calpine	Kelly Group	Spark Energy
Casner, Steve	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.	