December 30, 2015

PG&E AL 4582-E, SCE AL 3173-E, SCE AL 3173-E-A, SCE AL 3174-E, SDG&E AL 2699-E, and SDG&E AL 2700-E

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San Diego, CA 92123-1548

Subject: Fossil-Fuel Back-Up Generation Data Collection Plan Advice Letters Filed Pursuant to Decision 14-12-024

Dear Ms. Allen, Mr. Worden and Ms. Caulson:

Summary:

By this letter Energy Division is rejecting the Advice Letters (ALs) referenced above without prejudice. The Commission has taken up the issue of fossil-fuel back-up generation and demand response in a formal proceeding and therefore an advice letter is no longer a proper venue for addressing this topic. PG&E, SCE and SDG&E (The Utilities) should wait for further guidance from the Commission regarding this matter.

Background:

On February 9, 2015, the utilities filed back-up generation data collection plans and associated tariff changes via the ALs referenced above pursuant to D.14-12-024, Ordering Paragraph 15. The ALs were protested and suspended twice due to the complexity of the issues. On September 29, 2015, an
Administrative Law Judge ruling invited parties in R.13-09-011 to comment on an Energy Division staff proposal regarding the use of fossil-fueled generation in demand response programs. The staff proposal recommends that the Commission establish a prohibition on fossil fuel generation in demand response, instead of pursuing back up generation data as outlined in the ALs. The Commission has received party comments and reply comments on the staff proposal and will resolve this matter in the formal proceeding.

Disposition:
An Industry Division may reject an Advice Letter without prejudice “where the advice letter disposition would require an evidentiary hearing or otherwise require review in a formal proceeding.”¹ As noted earlier, the Commission is now reviewing the subject in a broader context within a proceeding. Therefore, PG&E AL 4582-E, SCE AL 3173-E, SCE AL 3173-E-A, SCE AL 3174-E, SDG&E AL 2699-E, and SDG&E AL 2700-E are rejected without prejudice. The Utilities should wait for further guidance from the Commission in the forthcoming future.

Sincerely,

Edward Randolph
Director, Energy Division

cc: Service List R.13-09-011

¹ General Order 96-B, section 7.6.1.
February 9, 2015

Advice 4582-E
(Pacific Gas and Electric Company - U 39 E)

Advice 2700-E
(San Diego Gas & Electric Company - U902 E)

Advice 3173-E
(Southern California Edison Company – U 338 E)

Public Utilities Commission of the State of California


I. SUBJECT


In compliance with the California Public Utilities Commission (Commission) Decision (D.) 14-12-024 (D.14-12-024 or Decision) dated December 4, 2014\(^1\), Pacific Gas and Electric Company (PG&E) on behalf of itself, Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E)\(^2\), (collectively, the IOUs) hereby submits this advice letter. The revised tariff sheets for PG&E are listed on Attachment 1. Since each of the IOU’s tariffs are a bit different, SCE and SDG&E will file their modified Preliminary Statements separately, each including the proposed language shown below in Section IV.

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\(^1\) D.14-12-024 was issued on December 9, 2014.

\(^2\) SCE and SDG&E have each authorized PG&E to file this Advice Letter on their behalf pursuant to Rule 1.8(d) of the Commission’s Rules of Practice and Procedure.
II. PURPOSE

Pursuant to Ordering Paragraph (OP) 15 of D.14-12-024, this advice letter revises tariffs to implement the data collection required by OPs 11, 12, 13, and 14. In addition, this advice letter establishes the scope and actions to collect the data. This proposal represents IOUs best attempts to follow D.14-12-024 and existing Commission policies and gather BUG data to allow for better policy decisions in the future. It also reflects discussions with Energy Division staff and provides an opportunity for affected parties to shape the implementation of the BUG survey.

III. BACKGROUND

On October 10, 2011, the Commission adopted D.11-10-003, which stated “[i]t is reasonable to adopt as a policy statement that fossil-fuel emergency back-up generation (BUG) resources should not be allowed as part of a demand response program for RA purposes, subject to rules adopted in future RA proceedings.” (D.11-10-003, Conclusion of Law 5) D.11-10-003, (OP 3) required the Commission staff and utilities to “identify data on how customers intend to use BUG and identify the amount of demand response provided by BUG when enrolling new customers in, or renewing, demand response programs.” D.11-10-003 deferred details on the process evaluation to the utilities’ 2012-2014 applications in A.11-03-011, et al.

Decision 12-04-045 (Decision Adopting Demand Response Activities and Budgets for 2012 through 2014), concluded that it was “reasonable to consider issues regarding the use of BUG in the Demand Response Rulemaking (R.) 07-01-041 [sic], or a successor proceeding.” (D.12-04-045, Conclusion of Law 21.)

R.13-09-011 is the successor proceeding to R.07-01-041. The policy issue of BUG was included in the original Scoping Memo and the revised Scoping Memo for this proceeding to address. Parties addressed this issue during workshops in June 2014, and presented their arguments in opening and reply briefs. On December 9, 2014, the Commission issued D.14-12-024 which found there was insufficient evidence in the record of the proceeding to determine whether it would be prudent for the Commission to prohibit BUG in demand response programs. (D.14-12-024, Finding of Fact 69.) D.14-12-024 directs the utilities to collect data on BUG and file a compliance document. OP 12 requires the utilities to require any non-residential demand response contracted customer to self-certify the following:

a. whether the customer owns or operates a back-up generator; and

b. the make, model and location of the generator if the customer owns one

OP 13 directs the utilities to collect information about hourly usage for each of the back-up generators owned by non-residential customers that participate in their demand response programs. That information is to be mapped against demand
response events, and the load reductions provided by the participants. In addition, D.14-12-024 requires a report containing the BUG data to be filed by November 30, 2015.

IV. **THE IOUs' PROPOSAL FOR TARIFF REVISIONS**

OP 15 of D.14-12-024 requires that the IOUs “file a Tier One advice letter, within 60 days from the issuance of the decision, revising its tariffs to implement the data collection” requirements. The IOUs agree that changes to their existing tariffs are appropriate to set forth the condition of service requirement for the customer in providing data about their BUG operations, even though D.14-12-024 only imposes a one-time requirement to collect the data.

The IOUs believe that this language should be relatively broad since the details for the data collection are still under development. The specific collection activities may also vary by customer type or program. The recommended language below will provide this flexibility.

“Non-residential customers who are on or apply for a demand response program or dynamic rate (like peak day pricing or critical peak pricing) are required to provide information about fossil-fueled generators on or capable of serving their premises, in part or in total, when requested by the utility. Fossil fuel in this context refers to generators or fuel cells powered by natural gas, propane, gasoline or diesel.”

The IOUs also recommend that this language be incorporated into their respective Preliminary Statements, under General Requirements. Placing this language in the IOU Preliminary Statements is the most efficient way to incorporate the new language in the tariffs. The IOUs would only have to modify one tariff page rather than multiple ones. If the IOUs were to include the BUG provision in each impacted tariff, not only will all the demand response program tariffs need to be changed, but all of the standard electric rate schedules would need to be modified too. This is because the IOUs have imbedded their respective critical peak pricing (CPP) programs into the electric rates themselves. Not only does the inclusion of this BUG provision in the Preliminary Statement help reduce IOU processing time for this initial filing, but it allows for changes (as needed) to be more easily and more consistently incorporated into the tariffs in the future.

\[3\] Specifically, SCE’s Preliminary Statement Part E, General and PG&E’s Preliminary Statement Part A, General would be revised.
V. ISSUES SURROUNDING THE GATHERING OF BUG DATA

a. Clarification of collection requirements

The IOUs have several questions and potential concerns over the use of the term "shall require" in OP 12 of the Decision. First, the IOUs have no way to compel the customers to provide this information. The IOUs will use best efforts to obtain the requested information from the customer, but many customers, despite multiple attempts and various methods of contact, probably will not reply. It is unreasonable to expect that 100 percent of the non-residential customers on demand response programs will respond. There is also an issue of how much effort should be made to get this data, the cost and amount of time involved. If the Commission wants a high response rate, aggressive efforts will be required to retrieve this data which in turn will come at a much higher cost to ratepayers. Also, if the Commission wants this data quickly, time may not be available to perform the necessary efforts to obtain most of the data.

The inclusion of the CPP programs in the BUG data collection process is also likely to diminish response rates. These customers were defaulted, some recently, to the various IOU CPP programs and had to proactively opt-out of the program if they elected not to participate. For instance, PG&E implemented the default of approximately 170,000 small and medium commercial and industrial customers to its Peak Day Pricing (PDP) program beginning in November 2015. PG&E has a significant outreach effort to these customers to explain PDP and their transition to this program, with the goal of helping them understand their options and making them comfortable with this dynamic pricing tariff. It would be contrary to the objective of the Commission-mandate to default customers to PDP, if the BUG data collection process were to interfere with their transition to PDP.

b. Consequences to customers of not responding to survey

As mentioned above, the IOUs have no real way to compel customers to respond to questions about having a BUG or providing the IOUs with their operational data if they do have one. The IOUs strongly oppose the notion that a threat to remove a customer from their DR program is a good way to compel them into action. Removing a customer from a DR program for not responding to a one-time data collection effort seems contrary to nearly every other recent Commission decision related to DR. The Commission has made very clear its intentions to expand DR through various means including auctions, resource adequacy payments and direct participation. The Commission itself in D.14-12-024 did not authorize expelling customers from DR programs if the data is not provided. Thus, the IOUs require a direct order from the Commission before making provision of the self-certification data and hourly usage data (if available) pursuant to OP 12 a condition for continuing eligibility. Furthermore, the IOUs expect that newly transitioned CPP customers
would react negatively to being transitioned without their prior approval to a CPP program in one month only to be removed from that program a year later.

c. **Vintage of data collected**

This issue relates to the question of whether 2014 or 2015 customer data for the BUG/DR operational overlay is best to use for this one-time assessment. The Decision does not specify the year in which the DR customer’s BUG usage occurs. The IOUs’ customer load data for 2014 is currently available and the 2014 DR program load impacts will be reported in April 2015. Conversely, data for 2015 will not be available until late November or December 2015, and the 2015 ex post load impacts will not be completed until April 2016. Therefore, the IOUs would need a filing date in early summer 2016 if data from 2015 were used.

In light of these considerations, the utilities propose to use data from 2014 for the report due November 2015.

d. **Other items for consideration**

- **Optional Binding Mandatory Curtailment (OBMC)** – The IOUs request that their enrolled OBMC customers be excluded from the BUG survey. OBMC customers agree to reduce their demand to an agreed upon level in lieu of being included in utility’s rotating outage block progression. The agreed-upon reduction must occur each time the CAISO sends the utility a notice that a firm load curtailment is required within the utility’s service territory. Additionally, a customer is required to operate its OBMC plan when the utility or the CAISO has initiated or is planning to initiate firm load curtailments in a local geographic area within the utility service territory. OBMC Plan curtailments shall be required concurrent with each and every firm load curtailment. Consequently OBMC is a rotating outage related plan, and is not a demand response program.

- **Air Conditioning (AC) Cycling** – The IOUs recommend that enrolled AC cycling customers be excluded from the BUG survey. AC cycling is a DR program where the utility installs controls that allow it to turn off (or to cycle) the customer’s air conditioning unit. Because the AC Cycling program involves direct control over the customer’s equipment, having BUG does not allow the customer to continue to operate its air conditioning unit when the utility has activated the AC Cycling controls. In addition, running the BUG does not increase the AC cycling incentive paid to the customer. Therefore the IOUs believe that a survey of AC Cycling customers with BUG would not be useful or
pertinent to this exercise and request exclusion of these customers from the data collection process.

- Agricultural Pumping Interruptible (AP-I) Program – SCE operates a load control program for Agricultural and Pumping customers. This program operates similarly to the AC Cycling program whereby a load control switch interrupts the pumping equipment during an AP-I event. As such, conducting a survey of these customers would not be useful because the BUG could not operate the equipment controlled by the AP-I switch. The IOUs recommend excluding the AP-I program from the survey.

VI. IOUS’ PROPOSAL FOR GATHERING BUG INFORMATION

The IOUs propose to jointly hire an independent third party vendor that is well experienced in survey, data collection and analysis to facilitate compliance with OPs 12, 13 and 14 in D.14-12-024. This approach has many benefits. First, an experienced vendor would likely be able to develop and implement the most efficient and comprehensive means of gathering the needed BUG data. Importantly, the vendor would allow for a consistent approach across the state. The use of the vendor would also provide support to the IOUs resources, because the IOUs had not contemplated this additional work. The contract with the vendor would be co-funded among the three IOUs. The IOUs propose that the costs be split such that PG&E and SCE each fund 45% of the vendor costs, while SDG&E funds the remaining 10%.

The IOUs suggest that the vendor provide at least three (3) proposals for collecting the data. The proposals would vary by expected response rates, perhaps broken down further by customer class or program, time to retrieve and analyze the data, and cost. The response would be shared with the Commission staff that could then consider these options and determine the approach that it would like to take given these various parameters.

The IOUs recommend the use of 2014 customer usage data (January through December) for the BUG operation/customer load shape overlay analysis. The use of this data will provide the quickest results to the Commission. For the purposes of this one-time survey effort, the IOUs suggest that both permanent and stationary generators be included in the data collection effort. It is still possible that a complete analysis will not be finished by the November 2015 report date, depending on the 3rd party vendor’s ability to collect the BUG data, and the time to analyze the data. If that is the case, the IOUs may need to ask for an extension of the currently required November filing date, or allow the report to be an update of progress towards the data collection and reporting requirements in D.14-12-024.
VII. BUG DATA COLLECTION REQUIREMENTS FOR CUSTOMERS IN AGGREGATOR MANAGED PORTFOLIO (AMP) CONTRACTS

The IOUs note the Commission’s statement that it has the authority to regulate the use of BUG by any participant of a Commission-regulated demand response program. The IOUs believe that the Commission intends its statement to include customers in third party aggregator’s portfolios under the Commission approved aggregator managed portfolio contracts, as well as the aggregators’ portfolios under tariffed demand response programs. The IOUs intend to work with the aggregators on collection of BUG data from these customers, and will look for mutually acceptable ways to manage the potential burden on the aggregators.

VIII. DATA CONFIDENTIALITY OF BUG INFORMATION

The IOUs believe that air district permit requirements do not apply to some BUGS (e.g. without limitation, generators under 50 braking horsepower.) The IOUs also anticipate that recording the number of hours of operation is not required for all BUGs. The IOUs will request the information required under OP 12 and OP 14 from the customers, including whether or not the customer has permits for its BUG from its local air district. However, there will be customers who do not have permits, and/or the number of hours of BUG operation. To the extent the requested information has not been previously provided to the local air district or otherwise been made public, customers will likely consider this information to be confidential. Under these circumstances, the IOUs believe that upon notification by a customer that the BUG information they are providing has not been provided to local air quality regulators or otherwise been made part of the public domain, that the information will be maintained on a confidential basis.

In order to facilitate customer responses, the Commission should recognize that the IOUs need to treat a customer’s BUG information as confidential, if the information is not already independently subject to public access. The IOUs believe this treatment is appropriate because specific customer identities are involved. This information has been treated as confidential in Commission decisions. (D.97-05-040, 72 CPUC 2d 441; D.97-10-031, 76 CPUC 2d 29; also, pursuant to D.90-12-121, the customer’s identity and specific information may not be provided to law enforcement entities except as allowed by due process of law.) Even as recently as May 2014, the Commission confirmed aggregation standards that prevent the identification of an individual customer. (D.14-05-016, pages 24 to 27, Findings of Fact 4, 5, 13, 19, 23, Conclusions of Law 7, 9.) In addition, mapping hourly information for the customer’s BUG (when available) to the customer’s performance when its DR program is called, requires the customer’s electric interval usage data. For that additional reason, mapping analysis under OP 14 would be confidential, if an individual customer could be identified or re-identified.
IX. COST AND COST RECOVERY FOR IMPLEMENTATION

The costs to implement OPs 12, 13, and 14 of D.14-12-024 are currently unknown and will depend on the specific research plan and level of effort to meet the Commission’s desired participation rate. Ideally, these costs will come from existing IOU funds already approved for DR program implementation or EM&V activities. Given the uncertainty of the costs and the potentially different approaches the IOUs might use, each IOU will determine and separately file to recovery its own costs.

X. PROTESTS

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 2, 2015, which is 21 days\(^4\) after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4\(^{th}\) 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 other IOUs either via E-mail or U.S. mail (and by facsimile, if possible) at the addresses shown below on the same date it is mailed or delivered to the Commission:

For PG&E:

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

\(^4\) The 20-day protest period concludes on a holiday. The IOUs hereby move this date to the following business day.
For SDG&E:

Attn: Megan Caulson
Regulatory Tariff Manager
9305 Lightwave Ave. SD1190
San Diego, CA 92123-1548
E-mail: mcaulson@semprautilities.com

For SCE:

Russell G. Worden
Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@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).

XI. EFFECTIVE DATE

In compliance with D.14-12-014, OP 15, the IOUs submit this filing as a Tier 1 advice letter to become effective pending disposition on February 9, 2015, which is the date of filing.

XII. 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.13-09-011. 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.

/S/
Meredith Allen
Senior Director, Regulatory Relations

Attachments

cc: Service List R.13-09-011
CALIFORNIA PUBLIC UTILITIES COMMISSION
ADVICE LETTER FILING SUMMARY
ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

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<th>Pacific Gas and Electric Company (ID U39 E)</th>
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<td>Contact Person: Shirley Wong</td>
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<tr>
<td>☑ ELC</td>
<td>Phone #: (415) 972-5505</td>
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<td>E-mail: <a href="mailto:slwb@pge.com">slwb@pge.com</a> and PG&amp;<a href="mailto:ETariffs@pge.com">ETariffs@pge.com</a></td>
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EXPLANATION OF UTILITY TYPE

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

Advice Letter (AL) #: 4582-E, et al.           Tier: 1

Keywords (choose from CPUC listing): Compliance
AL filing type: ☑ One-Time  □ Monthly  □ Quarterly  □ Annual  □ Other _____________________________
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 14-12-024
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?  ☑ No
Requested effective date: February 9, 2015  No. of tariff sheets: 4
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 Preliminary Statement A, Description of Service Area & General Requirements
Service affected and changes proposed: See advice letter, Section IV, The IOUs Proposal For Tariff Revisions
Protests, dispositions, and all other correspondence regarding this AL are due no later than 21 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

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<tr>
<th>CPUC, Energy Division</th>
<th>Pacific Gas and Electric Company</th>
</tr>
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<tbody>
<tr>
<td>ED Tariff Unit</td>
<td>Attn: Meredith Allen, Senior Director, Regulatory Relations</td>
</tr>
<tr>
<td>505 Van Ness Ave., 4th Floor</td>
<td>77 Beale Street, Mail Code B10C</td>
</tr>
<tr>
<td>San Francisco, CA 94102</td>
<td>P.O. Box 770000</td>
</tr>
<tr>
<td>E-mail: <a href="mailto:EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a></td>
<td>San Francisco, CA 94177</td>
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<tr>
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<td>E-mail: <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
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1The 20-day protest period concludes on a holiday. The IOUs hereby move this date to the following business day.
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A. DESCRIPTION OF SERVICE AREA AND GENERAL REQUIREMENTS (Cont’d.)

6. GENERAL

a. MEASUREMENT OF ELECTRIC ENERGY: Unless otherwise provided in the applicable tariff schedules, all electric energy supplied to customers by PG&E will be measured by means of suitable standard electric meters except where energy supplied to highway sign lighting, traffic control devices, communication system amplifiers or other loads can be accurately determined from load and operating time or other relevant data and where, in the opinion of PG&E, the installation of a meter is impractical.

b. DISCOUNTS: All rates hereinafter listed are net rates and are not subject to discount, unless specifically stated on the schedule.

c. DISCOUNTS FOR ADVANCES BY CUSTOMERS: Unless otherwise specified in PG&E’s tariffs, no discounts in unit rates are allowed in consideration of customers advancing funds.

d. LAMP SERVICE: PG&E does not supply free lamp renewals for commercial or residence lighting.

e. STANDARD RIDERS: No standard riders are used by PG&E.

f. Direct Access Start Date: The following portions of all PG&E rate schedules are suspended or modified until the date the Commission or its delegate declares to be the start date for Direct Access. These modifications or suspensions cease on the date the Commission or its delegate declares to be the start date for Direct Access.

1) Schedule PX and Schedule E-DEPART

2) The condition found in the “RATES” section of each rate schedule which describes the Generation charge and the calculation of CTC.

3) The “SPECIAL CONDITION” or section within each rate schedule titled “BILLING,” which describes the options available to customers with the start of direct access.

4) The section of Schedule E-EXEMPT titled “For Customers Taking Service Under This Schedule After the Start Date for Direct Access.”

g. Backup Generator Data Collection: Non-residential customers who are on or apply for a demand response program or dynamic rate (like peak day pricing or critical peak pricing) are required to provide information about fossil-fueled generators on or capable of serving their premises, in part or in total, when requested by the utility. Fossil fuel in this context refers to generators or fuel cells powered by natural gas, propane, gasoline or diesel.

(Continued)
ELECTRIC PRELIMINARY STATEMENT PART A
DESCRIPTION OF SERVICE AREA & GENERAL REQUIREMENTS

A. DESCRIPTION OF SERVICE AREA AND GENERAL REQUIREMENTS (Cont’d.)

7. SYMBOLS

When any change is proposed on any tariff schedule, attention shall be directed to such change by an appropriate character along the right-hand margin of the official copies filed with the Commission, utilizing the following symbols:

(C) To signify changed listing, rule, or condition which may affect rates or charges;
(D) To signify discontinued material, including listing, rate, rule or condition;
(I) To signify increase;
(L) To signify material relocated from or to another part of tariff schedules with no change in text, rate, rule or condition;
(N) To signify new material including listing, rate, rule or condition;
(P) To signify material subject to change under a pending application or advice letter;
(R) To signify reduction; and
(T) To signify change in wording of text but no change in rate, rule or condition.
# ELECTRIC TABLE OF CONTENTS

## TABLE OF CONTENTS

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**Advice Letter No:** 4582-E  
**Decision No:** 14-12-024  
**Issued by:** Steven Malnight  
**Date Filed:** February 9, 2015  
**Effective Resolution No.:** 1H11
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