July 21, 2015

Advice Letter 4655-E

Eric Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA  94177

Subject: Revision of Electric Schedule LS-1 (PG&E-Owned Street and Highway Lighting) to Expand Applicability of the Optional LED Program

Dear Mr. Jacobson:

Advice Letter 4655-E is effective July 26, 2015.

Sincerely,

Edward Randolph
Director, Energy Division
June 26, 2015

Advice 4655-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Revision of Electric Schedule LS-1 (PG&E-Owned Street and Highway Lighting) to Expand Applicability of the Optional LED Program

Purpose

The purpose of this filing is to submit revisions to Electric Schedule LS-1 (PG&E-Owned Street and Highway Lighting) to expand Pacific Gas and Electric Company’s (PG&E’s) optional Light Emitting Diode (LED) street light program to include new lights and lights replaced in conjunction with other work.

Background

Decision (D.) 14-08-032 authorized PG&E to implement an option within PG&E’s streetlight program whereby PG&E LS-1 customers can request the replacement of existing non-decorative High Pressure Sodium (HPS) street lights with LED street lights. Under PG&E’s LED program, customers electing to participate pay a monthly LED Program Incremental Facility Charge in lieu of paying the estimated full cost of replacement in advance of the work.

As PG&E has begun to implement its LED street light program, it has become apparent that the current language of the special conditions of Electric Schedule LS-1 may result in some unintended consequences that need to be addressed.

Under the current terms of special condition 9.b of LS-1, a customer requesting installation of a new LED street light must pay the estimated incremental installed cost difference between the cost of the LED luminaire and the HPS luminaire in advance of the work being done. The same terms apply when PG&E is replacing streetlights for reasons other than LED conversion (such as overhead to underground conversions, road widening, or PG&E replacement of Regulated Output lighting systems with standard voltage systems).

The ability to elect to fund LED conversions through an Incremental Facilities Charge for existing streetlights, but not newly installed streetlights (or streetlights replaced as part
of other work), creates a situation where the customer may request that PG&E install HPS luminaires for new or replacement lighting to avoid paying the upfront incremental cost difference, even if the customer fully intends to participate in PG&E’s LED street light replacement program. This results in a situation where PG&E then must purchase and install a new HPS luminaire; only to have to come back shortly thereafter to install a replacement LED luminaire.

PG&E proposes to expand the LED street light replacement program to new installations and streetlights that PG&E will replace as part of other work so that customers not wishing to pay the incremental cost difference of LED conversion upfront can instead elect to pay the applicable LED Program Incremental Facility Charge (as shown on Sheet 2 of Schedule LS-1). This change to the program will assure that the incremental cost for the LED luminaire upgrade is properly recovered through the facilities charge and will eliminate any incentive for customers to request that an HPS luminaire be installed and then only subsequently request an upgrade to LED.

**Tariff Revisions**

**Electric Rate Schedule LS-1**

- Special Conditions, Section 9.b (Sheet 16), Payment for Installation of Lighting Facilities

  - Inserted text: “Customers not wishing to pay the estimated cost difference between LED and HPS for new (or replacement where PG&E is performing other work related to existing lights) lighting installations under LS-1A, C, E or F may elect to include new lights under PG&E’s optional LED streetlight replacement program by choosing to pay the incremental Facility Charge for the program.”

**Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than July 16, 2015, 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:

Erik Jacobson  
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 2 Advice Letter be approved on regular notice with the effective date of July 26, 2015, which is 30 days from the filing date.

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.12-11-009 and R.13-11-005. 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/  
Erik Jacobson  
Director, Regulatory Relations

Attachments

cc:  Service Lists A.12-11-009 and R.13-11-005
**ADVICE LETTER FILING SUMMARY**

**ENERGY UTILITY**

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**Company name/CPUC Utility No.** Pacific Gas and Electric Company (ID U39 E)

**Utility type:**
- [x] ELC
- [ ] GAS
- [ ] PLC
- [ ] HEAT
- [ ] WATER

**Contact Person:** Kingsley Cheng

**Phone #: (415) 973-5265**

**E-mail:** k2e0@pge.com and PGETariffs@pge.com

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**EXPLANATION OF UTILITY TYPE**

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<th>PLC = Pipeline</th>
<th>HEAT = Heat</th>
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**Advice Letter (AL) #:** 4655-E

**Tier: 2**

**Subject of AL:** Revision of Electric Schedule LS-1 (PG&E-Owned Street and Highway Lighting) to Expand Applicability of the Optional LED Program

**Keywords (choose from CPUC listing):** Street Lights

**AL filing type:**
- [ ] Monthly
- [x] Quarterly
- [ ] Annual
- [ ] One-Time
- [ ] Other _____________________________

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: N/A

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:
________________________________________________________________________________________________

Resolutions Required? [ ] Yes  [x] No

**Requested effective date:** July 26, 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 Rate Schedule LS-1

**Service affected and changes proposed:** PG&E’s LED Program

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

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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: Erik Jacobson

Director, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com
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9. **PAYMENT FOR INSTALLATION OF LIGHTING FACILITIES:**

   a) For HPS installations, PG&E will provide at its expense the luminaire kit and standard arm for LS-1A and LS-1C for second and multiple lights on a PG&E pole, for Class LS-1D, a standard post top, for Class LS-1E a luminaire kit, and for Class LS-1F a luminaire kit and standard arm. Customer or Applicant shall pay, in advance, the estimated installed cost of the remaining lighting facilities that PG&E is required to install. Allowances are not applied to street light facilities on the load side of the service delivery point.

   b) For non-decorative LED installations under LS-1A, LS-1C for second and multiple lights on a PG&E pole, LS-1E and LS-1F, where the LED fixture has been approved by PG&E, the Customer shall pay to PG&E, in advance a non-refundable amount equal to PG&E’s estimated cost difference between the LED installation and installation of a standard non-decorative HPS luminaire of equivalent light output as determined by PG&E. Only fixtures selected by PG&E are eligible for installation under LS-1 except as addressed in Special Condition 12. Allowances are not applied to street light facilities on the load side of the service delivery point.

   For LS-1A, LS-1C, LS-1E and LS-1F customers who elect to participate in PG&E’s optional LED streetlight replacement program, no advance costs will be collected for the replacement of existing lights, but the customer will pay the Incremental Facility Charge authorized in D. 14-08-032.

   (L)
9. **PAYMENT FOR INSTALLATION OF LIGHTING FACILITIES** (Cont’d.):
   
b) Customers not wishing to pay the estimated cost difference between LED and HPS for new (or replacement where PG&E is performing other work related to existing lights) lighting installations under LS-1A, C, E or F may elect to include new lights under PG&E’s optional LED streetlight replacement program by choosing to pay the Incremental Facility Charge for the program.

   Any attachments to street light poles requested by governmental agencies requires prior approval by PG&E and execution of a license agreement. Unauthorized attachments are subject to removal.

10. **OWNERSHIP:** All facilities installed under the provisions of this rate schedule shall be owned, operated and maintained by PG&E.

11. **MAINTENANCE, ACCESS, CLEARANCES**
   
a) Maintenance: PG&E shall exercise reasonable care and diligence in maintaining PG&E-owned facilities.

b) Access: Customer will maintain adequate access for PG&E’s standard equipment used in maintaining facilities and for installation of its facilities. PG&E reserves the right to collect additional maintenance costs due to obstructed access or other conditions preventing PG&E from maintaining its equipment with standard operating procedures. Applicant or Customer shall be responsible for rearrangement charges as provided for in Special Condition 5.

c) Clearances: Customer will, at Customers expense, correct all access or clearance infractions, or pay PG&E’s total estimated cost for PG&E to relocate facilities to a new location which is acceptable to PG&E. Failure to comply with corrective measures within a reasonable time may result in discontinuance of service in accordance with electric Rule 11. Applicant or Customer shall be responsible for tree trimming to maintain lighting patterns of existing lights.

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Advice Letter No: 4655-E  
Issued by Steven Malnight  
Date Filed June 26, 2015  
Decision No. Regulatory Affairs  
Effective Resolution No.
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