January 21, 2016

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

SUBJECT:  Clarification & Revision of Special Condition 1 of City & County of SF Street Lighting Schedule No. 9 & Approval of Use of Decorative Fiberglass Shell for "Triangle District" Ornamental Street Lights

Dear Mr. Jacobson:

Advice Letter 4668-E is withdrawn per Pacific Gas and Electric Company Withdrawal Letter, received on January 20, 2016.

Sincerely,

Edward Randolph
Director, Energy Division
July 10, 2015

Advice 4668-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Clarification and Revision of Special Condition 1 of City and County of San Francisco Street Lighting Schedule No. 9 and Approval of Use of Decorative Fiberglass Shell for "Triangle District" Ornamental Street Lights

Purpose

Pursuant to General Order 96-B, section 8.2.3, service to a governmental agency, Pacific Gas and Electric Company (PG&E) is making this filing to clarify and revise Street Lighting Service in the City and County of San Francisco (CCSF), Schedule No. 9, applicable to PG&E owned ornamental lighting installations in the downtown “Triangle District” of San Francisco, also known as the “Golden Triangle”, originally approved in Advice letter 1170-E. For the reasons discussed below, including safety and ease of installation, PG&E is planning to replace several existing steel poles that have ornamental cast iron shells with new steel poles with identical ornamental fiberglass shells. Special Condition 1 of CCSF Schedule No. 9 refers to ornamental steel poles, but does not indicate whether the ornamental shells should be cast iron or fiberglass. In addition, since the rates for Schedule No. 9 are established in other proceedings, PG&E proposes to delete the obsolete rate language from Schedule No. 9.

Background

The Golden Triangle in San Francisco is the downtown area bounded by Market Street, Mason Street and Sutter Street. PG&E has 193 ornamental street lighting installations in the Golden Triangle. These installations have a steel pole core, with an ornamental outside shell of cast iron.

PG&E has special rate schedules for PG&E-owned street lights in CCSF. On March 17, 1977, PG&E filed Advice letter 591-E, submitting a January 3, 1977 Street light Agreement between PG&E and CCSF (1977 Agreement) pursuant to Section X.B of

For ease of reference a copy of the current Schedule No. 9 is attached as Exhibit A.
General Order 96-A. The 1977 Agreement provided that it would remain in effect as long as a 1945 PG&E/CCSF Hetch Hetchy Agreement remained in effect.

In January 1988, PG&E filed, and the California Public Utilities Commission (CPUC or Commission) approved, Advice letter 1170-E, which submitted an amendment to the January 1977 Agreement, including, among other things, a rate schedule for Street Lighting Service, City and County of San Francisco, Schedule No. 9. Schedule No. 9 is applicable to PG&E-owned and maintained ornamental lighting installations in the downtown “Triangle District.” Special Condition 1 of Schedule No. 9 states “Installations made entirely at PG&E’s expense consisting of two of PG&E’s ornamental ‘triangle’ type luminaires with high pressure sodium vapor lamps, necessary support arms, and control facilities installed on ornamental steel poles which is supplied with an underground service.” Although Special Condition 1 refers to ornamental steel poles, in fact the steel itself is not ornamental, but the steel poles have an ornamental shell mold, currently comprised of cast iron.

In April 1991, the CPUC issued Resolution E-3203, which approved a request by PG&E to revise the rates for street lighting service in CCSF. As explained in Resolution E-3203, the January 1977 Agreement terminated in December 1988 when a new Hetch Hetchy Agreement replaced the 1945 Agreement. (Resolution E-3203, at p.2.) However, PG&E continued to provide street lighting service to CCSF in accordance with the 1977 Agreement pending the signing of a new agreement or CPUC approval of revised rates. (Id., at p.3.)

Resolution E-3203 approved PG&E’s advice letter. Subsequent rate changes for the special CCSF street light rates, including Schedule No. 9, have been addressed in Phase 2 of PG&E’s General Rate Cases. See, e.g., D.07-09-004, adopting settlements in Phase 2 of PG&E’s 2007 General Rate Case, at Appendix D, Exhibit B, for CCSF street light rates, including Schedule No. 9; D.11-12-053, adopting settlements in Phase 2 of PG&E’s 2011 General Rate Case, at Appendix D, Attachment 1.

In 2012, two ornamental lights fell over in separate incidents. Both street lights toppled during high winds as a result of an internal steel core failure due to extensive metal corrosion. Among the reasons for the internal corrosion of the steel core was the intrusion of water, often as a result of holes drilled when attaching stop signs or crossing signs. PG&E is currently in the process of replacing several of the steel poles and is either refurbishing or looking to replace several of the outer shells. In addition, PG&E is working with stakeholders to prevent signs from being attached and holes being drilled into the steel core.

**Proposed Clarification and Change**

PG&E is seeking to revise CCSF Street Lighting Schedule No. 9 to clarify that the ornamental outer shell may be either cast iron or fiberglass. The two decorative shells
are visually indistinguishable.\(^2\) PG&E is also proposing to delete the outdated rate information from twenty years ago on Schedule No. 9 as submitted in the advice letters described above.

PG&E believes there are numerous benefits to replacing some of the existing cast iron shells with identical fiberglass shells.

First, fiberglass shells are safer than cast iron shells. Because cast iron is so much heavier than fiberglass, it poses a greater safety risk if the steel pipe weakens or corrodes. A cast iron shell weighs approximately two thousand pounds, whereas a fiberglass shell is approximately 480 pounds, less than a quarter of the weight. In addition, fiberglass is non-conductive, and thus virtually eliminates any possible concerns over stray voltage or contact voltage, admittedly an infrequent occurrence.

Second, fiberglass shells are much easier to install due to the reduced weight. Installing a heavy cast-iron street light over a “hollow” space underneath the sidewalk creates significant foundation design challenges due to the weight. Many locations in the Golden Triangle have a finished inhabitable space extending out from a building and underneath the sidewalk (and PG&E’s street lights). If one uses cast iron, these installations need to be specially engineered to accommodate the weight of cast-iron structures. Conversely, the fiberglass alternative simplifies the installation due to the reduced weight and resulting simplified foundation design/reinforcement and simplified installation moving the pieces into position over the center pole.

Third, fiberglass has a lower cost and significantly shorter material procurement lead time than cast iron. Replacements for the outer structure of the ornamental lights using cast iron need to be specially made from a mold.

The Historical Preservation Commission of the City and County of San Francisco has indicated that, in its view, PG&E may not replace or alter any street lights in the Golden Triangle without its discretionary permission. PG&E disagrees, as this Commission has exclusive jurisdiction over replacing or altering utility facilities, especially in light of the safety considerations discussed involved. (See, e.g., Town of Woodside, D.88462, 83 CPUC 418, 422; Re Rules, Procedures and Practices Applicable to Transmission Lines Not Exceeding 200 Kilovolts (1994) 55 Cal.PUC2d 87, 112 (D.94-06-014) (“All utility-owned electric transmission lines, power lines, distribution lines, substations and facilities remain under the Commission’s exclusive jurisdiction and may not be preempted by any local agency.”).\(^3\)

\(^2\) Attached as Exhibit B are pictures of both fiberglass and cast iron shells that show how indistinguishable they are.

\(^3\) See also San Diego Gas & Electric Co. v. City of Carlsbad (1998) 64 Cal.App.4\(^{th}\) 785, 802.
**Schedule No. 9 Revisions**

PG&E proposes to make three sets of changes to CCSF Street Lighting Schedule No. 9.

First, PG&E will make the simple change from “PGandE” to “PG&E.”

Second, PG&E proposes to revise Special Condition 1 of CCSF Street Lighting Schedule No. 9 to explicitly clarify what is implicit now, i.e., that PG&E can change the material for the decorative outer shell⁴. Accordingly, PG&E proposes to amend Special Condition 1 as follows:

Installations made entirely at PGandE’s PG&E’s expense consisting of two of PGandE’s PG&E’s ornamental ‘triangle’ type luminaires with high pressure sodium vapor lamps, necessary support arms, and control facilities installed on ornamental steel poles with ornamental cast iron or fiberglass shells and which is supplied with an underground service.

Third, PG&E proposes to remove the outdated rate information, and replace it with “Rates for service are applicable as determined by the California Public Utilities Commission”.

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 July 30, 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:

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⁴ Attached as Exhibit C is a redlined version of Schedule No. 9 illustrating the proposed revisions.
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, August 9, 2015, 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 A.13-04-012. 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 List A.13-04-012
S.F. Planning Commission
Andrea Ruiz-Esquide, Deputy City Attorney
Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 E)

<table>
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<tr>
<th>Utility type</th>
<th>Contact Person</th>
<th>Phone number</th>
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<tr>
<td>☑ ELC</td>
<td>Kingsley Cheng</td>
<td>(415) 973-5265</td>
<td><a href="mailto:k2c0@pge.com">k2c0@pge.com</a>, <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
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<td>☑ WATER</td>
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EXPLANATION OF UTILITY TYPE

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

Advice Letter (AL) #: 4668-E

Subject of AL: Clarification and Revision of Special Condition 1 of City and County of San Francisco Street Lighting Schedule No. 9 and Approval of Use of Decorative Fiberglass Shell for “Triangle District” Ornamental Street Lights

Keywords (choose from CPUC listing): Street Lights

AL filing type: ☑ One-Time  ☐ Monthly  ☐ Quarterly  ☐ Annual  ☐ 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: N/A

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: N/A

Resolution Required? ☑ Yes  ☐ No

Requested effective date: August 9, 2015

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 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission  Pacific Gas and Electric Company
Energy Division Attn: Erik Jacobson
EDTariffUnit Director, Regulatory Relations
505 Van Ness Ave., 4th Flr. 77 Beale Street, Mail Code B10C
San Francisco, CA 94102 P.O. Box 770000
E-mail: EDTariffUnit@cpuc.ca.gov San Francisco, CA 94177
E-mail: PGETariffs@pge.com
Exhibit A

Current Schedule No. 9
STREET LIGHTING SERVICE
CITY AND COUNTY OF SAN FRANCISCO
Schedule No. 9

APPLICABILITY
This schedule is applicable to PGandE-owned and maintained ornamental lighting installations which utilize PGandE's underground distribution facilities. Rates for service are applicable as determined by agreement and in the special conditions of this schedule.

TERRITORY
Downtown "Triangle District" bounded by Market Street, Mason Street, and Sutter Street (Exhibit No. 9).

RATES

<table>
<thead>
<tr>
<th>Operating Schedule</th>
<th>Rate per Lamp per Month</th>
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<tr>
<td>Nominal Lamp Rating</td>
<td>1st Light 2nd Light</td>
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<tr>
<td>Incandescent Lamps</td>
<td>All Night All Night</td>
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<td>10,000 lumens</td>
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RATES

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<th>High Pressure Sodium Vapor</th>
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<td>Lamp Watts Average Initial Lumens</td>
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<tr>
<td>150 16,000</td>
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SPECIAL CONDITIONS
1. Installations made entirely at PGandE's expense consisting of two of PGandE's ornamental "triangle" type luminaires with high pressure sodium vapor lamps, necessary support arms, and control facilities installed on ornamental steel poles which is supplied with an underground service.
2. Ownership of all facilities installed by PGandE under this schedule shall become and remain the sole property of PGandE.

*Service under rates marked with an asterisk is limited to existing installations.

Effective January 1, 1987
Exhibit B

Pictures of Both Fiberglass and Cast Iron Shells
Cast-Iron vs. Fiberglass Replica (Picture)

Cast-Iron

Fiberglass (un-painted)
Exhibit C

Clean and Redlined Version of Proposed Schedule No. 9
APPLICABILITY

This schedule is applicable to PG&E-owned and maintained ornamental lighting installations which utilize PG&E’s underground distribution facilities. Rates for service are applicable as determined by the California Public Utilities Commission.

TERRITORY

Downtown "Triangle District" bounded by Market Street, Mason Street and Sutter Street (Exhibit No. 9).

SPECIAL CONDITIONS

1. Installations made entirely at PG&E’s expense consisting of two of PG&E’s ornamental "triangle" type luminaires with high pressure sodium vapor lamps, necessary support arms, and control facilities installed on steel poles with ornamental cast iron or fiberglass shells and which is supplied with an underground service.

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This schedule is applicable to PGandE-owned and maintained ornamental lighting installations which utilize PGandE's underground distribution facilities. Rates for service are applicable as determined by the California Public Utilities Commission agreement and in the special conditions of this schedule.

TERRITORY

Downtown "Triangle District" bounded by Market Street, Mason Street and Sutter Street (Exhibit No. 9).

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<td>Lamp Watt</td>
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<tr>
<td>450</td>
<td>46,000</td>
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*Service under rates marked with an asterisk is limited to existing installations.
AT&T
Albion Power Company
Aldantar & Kahl LLP
Anderson & Poole
BART
Barkovich & Yap, Inc.
Bartle Wells Associates
Braun Blasing McLaughlin, P.C.
CENERGY POWER
CPUC
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
Douglass & Liddell
Downey & Brand
Ellison Schneider & Harris LLP
G. A. Krause & Assoc.
GenOn Energy Inc.
GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Power Institute
Hanna & Morton
In House Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Leviton Manufacturing Co., Inc.
Linde
Los Angeles County Integrated Waste Management Task Force
Los Angeles Dept of Water & Power
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenna Long & Aldridge LLP
McKenzie & Associates
Modesto Irrigation District
Morgan Stanley
NLine Energy, Inc.
NRG Solar
Nexant, Inc.
Occidental Energy Marketing, Inc.
Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Praxair
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
SCE
SDG&E and SoCalGas
SPURR
San Francisco Water Power and Sewer
Seattle City Light
Sempra Energy (Socal Gas)
Sempra Utilities
SoCalGas
Southern California Edison Company
Spark Energy
Sun Light & Power
Sunshine Design
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Tiger Natural Gas, Inc.
TransCanada
Troutman Sanders LLP
Utility Cost Management
Utility Power Solutions
Utility Specialists
Verizon
Water and Energy Consulting
Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)
YEP Energy