August 24, 2015

Erik 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 to Electric Preliminary Statement Part FB – Fire Hazard Prevention Memorandum Account, Pursuant to R.15-05-006

Dear Mr. Jacobson:

Advice Letter 4669-E is effective May 7, 2015.

Sincerely,

Edward Randolph
Director, Energy Division
July 16, 2015

Advice 4669-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject:  Revision to Electric Preliminary Statement Part FB - Fire Hazard Prevention Memorandum Account, Pursuant to Rulemaking 15-05-006

Pacific Gas and Electric Company (PG&E) submits for approval revisions to its electric tariffs. Revisions to the Fire Hazard Prevention Memorandum Account (FHPMA) Preliminary Statement are provided in Attachment 1.

Purpose

The purpose of this advice filing is to update the existing FHPMA to comply with Ordering Paragraph (OP) 9 of Rulemaking (R.)15-05-006, dated May 7, 2015. The function of the FHPMA is to record costs that are not being recovered elsewhere in order to avoid retroactive ratemaking.

R.15-05-006 is the successor to R.08-11-005 and the California Public Utilities Commission (Commission or CPUC) notes that in rulemaking proceedings that span long periods of time, it is the Commission’s practice to periodically close the rulemaking proceeding and open a successor rulemaking proceeding with some or all of the outstanding matters transferred to the new proceeding.¹

The filing would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Background

On November 6, 2008, the Commission initiated R.08-11-005, to consider revising and clarifying the Commission’s regulations designed to protect the public from potential hazards, including fires, which may be caused by electric utility transmission or distribution lines or communications infrastructure providers’ facilities in proximity to overhead electric lines. Originally, the proceeding was divided into two phases; Phase

¹ See R.15-05-006, Section 2 at p. 5
1 was to adopt measures that could be implemented in time for the 2009 autumn fire season in Southern California, and Phase 2 was to adopt measures that required more time to consider and implement.

On August 25, 2009, the Commission issued its decision in Phase 1, D.09-08-029, which, among other things, directed “each cost of service regulated utility to file an advice letter establishing a memorandum account and to record its costs related to implementing these measures in a memorandum account to avoid retroactive ratemaking” (D.09-08-029 at p.54, and Ordering Paragraph 7).

On September 10, 2009, PG&E filed Advice Letter 3523-E to establish the FHPMA in compliance with Ordering Paragraph 7 of D.09-08-029. The Advice Letter was approved on October 5, 2009 and the FHPMA was effective August 20, 2009.

On January 18, 2012, the Commission issued its decision in Phase 2, D.12-01-032, which, among other things, established a new Phase 3 of the proceeding to consider a number of additional issues including potential new fire threat maps, revising Section IV of GO 95 to incorporate a new high fire threat District, and potential additional new fire safety standards for the new high fire threat district.

In May 2015, the Commission adopted an order closing R.08-11-005 and opened a new R.15-05-006 to continue the implementation of fire safety prevention measures. OP 9.iii of the adopted order states that “the Electric IOUs may record their payments in their Fire Hazard Prevention Memorandum Accounts [FHPMA] that are described in D.12-01-032 at 153-156.”

**Tariff Revisions**

*Electric Preliminary Statement Part FB – Fire Hazard Prevention Memorandum Account* is revised to incorporate the reference to R.15-05-006 and future subsequent proceedings, if applicable.

**Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 5, 2015, which is 20 days after the date of this filing. Protests must be submitted to:
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 submits this advice letter as a Tier 1 filing and requests that this advice filing become effective as of May 7, 2015, the date of the issuance of the Order Instituting Rulemaking in R.15-05-006.

**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.08-11-005 and R.15-05-006. 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 R.08-11-005 and R.15-05-006
Company name/CPUC Utility No. Pacific Gas and Electric Company (ID U39 E)

Utility type: ☑ ELC  ☐ GAS
¤ PLC  ☐ HEAT  ☐ WATER

Contact Person: Jennifer Wirowek
Phone #: (415) 973-1419
E-mail: j6ws@pge.com and PGETariffs@pge.com

Advice Letter (AL) #: 4669-E
Tier: 1
Subject of AL: Revision to Electric Preliminary Statement Part FB - Fire Hazard Prevention Memorandum Account, Pursuant to Rulemaking 15-05-006

Keywords (choose from CPUC listing): Memorandum Account

AL filing type: ☑ One-Time  ☐ Other _______________________

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: R.15-05-006

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: May 7, 2015

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 Part FB: Fire Hazard Prevention Memorandum Account

Service affected and changes proposed: See Attachment 1

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
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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1. PURPOSE: The purpose of the FHPMA is to track and record costs associated with the implementation of regulations and requirements adopted in Rulemaking 08-11-005, Rulemaking 15-05-006, and any subsequent proceedings that have not been previously authorized for recovery in PG&E’s General Rate Case (GRC) or any other regulatory proceedings.

2. APPLICABILITY: The FHPMA shall apply to all customer classes, except for those specifically excluded by the Commission.

3. REVISION DATE: The disposition of this account shall be addressed in a separate application or in PG&E’s GRC application after the close of Rulemaking 15-05-006 or subsequent successor proceedings.

4. FHPMA RATES: The FHPMA does not have a rate component.

5. ACCOUNTING PROCEDURE: PG&E shall make the following entries to the FHPMA:

   a. A monthly debit entry equal to PG&E’s expenses associated with the implementation of fire hazard prevention measures adopted in Rulemaking 08-11-005, Rulemaking 15-05-006, and any subsequent proceedings governed by GO 95;
   
   b. A monthly debit entry equal to PG&E’s expenses associated with the implementation of fire hazard prevention measures adopted in Rulemaking 08-11-005, Rulemaking 15-05-006, and any subsequent proceedings governed by GO 165;
   
   c. A monthly debit entry equal to PG&E’s expenses associated with any other implementation of regulations and requirements adopted by the Commission in Rulemaking 08-11-005, Rulemaking 15-05-006, and any subsequent proceedings;
   
   d. A credit entry to transfer the balance plus interest in this FHPMA to other accounts for future rate recovery, as authorized by the CPUC in Rulemaking 08-11-005, Rulemaking 15-05-006, and any subsequent proceedings; and
   
   e. A monthly debit entry equal to interest on the average balance in the FHPMA at the beginning of the month and the balance at the end of the month, at a rate equal to one-twelfth the interest rate on a three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
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**Sheet 1**

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

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Casner, Steve
Center for Biological Diversity

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City of San Jose
Clean Power
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