

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 24, 2016

Advice Letter 4722-E/A/B

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94177

Subject: AL 4722-E/A/B – Request for Approval of PG&E’s Outreach and Implementation Plan for Implementing the Super User Electric Surcharge per D.15-07-001

Dear Mr. Jacobson:

On October 16<sup>th</sup>, 2015 Pacific Gas and Electric (PG&E) filed Advice Letter (AL) 4722-E that submitted for Commission approval an outreach and implementation plan for the Super User Electric (SUE) Surcharge as required by Decision (D.) 15-07-001. The Office of Ratepayer Advocates (ORA) filed a timely protest to AL 4722-E on November 5<sup>th</sup>, 2015, making recommendations on how to improve the SUE alert plans. PG&E responded to ORA’s protest on November 13<sup>th</sup>, 2015.

Pursuant to requests from Energy Division and other stakeholders, PG&E submitted AL 4722-E-A on March 25<sup>th</sup>, 2016. This supplemental filing substantially revised and supported PG&E’s original SUE outreach and implementation plan. A timely protest to AL 4722-E-A by the California Solar Energy Industries Association and SolarCity Corporation (the Solar Parties) was received on April 14<sup>th</sup>, 2016. This protest generally centered on the lack of outreach planned by PG&E on distributed generation options that may help SUE-affected customers reduce their energy bills. PG&E responded to this protest on April 21<sup>st</sup>, 2016. In its response, PG&E stated that it would include distributed generation in its list of options for “at risk” SUE customers.

On July 27<sup>th</sup>, 2016, PG&E filed a second supplement to the original advice letter, AL 4722-E-B. In this supplemental PG&E adjusted the nomenclature of the SUE charge as it will appear on customer bills. PG&E also incorporated changes requested by Energy Division regarding the monthly usage that would trigger overall SUE outreach to a particular customer. Further, PG&E proposed to modify its SUE outreach to be seasonal as well as annual in nature. Finally, PG&E proposed to revise the timeline for SUE outreach to provide additional flexibility. No protests were received on AL 4722-E-B.

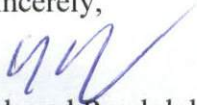
**Energy Division staff reviewed PG&E's AL 4722-E/A/B and determined that, taken as a whole, they comply with D.15-07-001. The protests lodged against the advice letters do not demonstrate non-compliance with D.15-07-001. The advice letters are therefore approved.**

Regarding ORA's protest to the original advice letter, subsequent to the protest, PG&E substantially revised and redeveloped their SUE outreach plan. Energy Division believes that the revisions as described in the supplemental advice letters sufficiently address ORA's concerns.

Regarding the protest of the Solar Parties to AL 4722-E-A, staff notes that PG&E offered to clarify that distributed generation was an option for customers affected by the SUE charge to consider when deciding how to lower their energy bills. Energy Division believes that this clarification is sufficient to address the concerns of the Solar Parties. We decline to require PG&E to redirect customers to other websites as this form of outreach is not specifically required by D.15-07-001. We note that the intent of the SUE charge is to maintain a rate-based conservation incentive for the highest electricity users, and we trust that the Solar Parties will continue to effectively market their product to this class of customer.

AL 4722-E/A/B is effective as of the date of this letter.

Sincerely,



Edward Randolph  
Director, Energy Division



**Erik Jacobson**  
Director  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415-973-7226

July 27, 2016

**Advice 4722-E-B**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Second Supplemental: PG&E's Outreach and Education Plan for Implementing the Super User Electric Surcharge per D.15-07-001**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby submits a supplement to advice letters 4722-E and 4722-E-A to provide minor adjustments to its proposed marketing plan and provide the final version of a sample bill which illustrates the placement of the Super User Electric (SUE) surcharge.

**Background**

On July 3, 2015, the Commission approved D.15-07-001, *Decision on Phase 1 of Residential Rate Reform for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company and Transition to Time-of-Use Rates* (the Decision), that reforms residential electric rates during the years 2015 to 2020 and transitions customers to time-of-use rates.

The Decision adopted a SUE surcharge which is intended to send a message to high-use customers informing them their usage is significantly above typical household usage and encouraging them to take steps to conserve. The surcharge, which is to begin in 2017, will apply to customers' usage above 400% of their baseline.

PG&E has previously filed Advice 4722-E and 4722-E-A detailing PG&E's outreach and education plan for implementing the SUE surcharge. This supplemental filing does the following:

- Adjusts the name of the surcharge to "High Usage" on customer energy statements and in education and outreach materials;
- Modifies the outreach and education plan to target customers who reach 350 percent or more above baseline for at least three months during the prior twelve months, per the direction of Energy Division;

- Adjusts the communications timeline for outreach to address the seasonality spikes, by providing outreach to customers who will incur the surcharge only seasonally on a different timeline; and
- Revises the timeline for the overall outreach plan to provide additional implementation flexibility.

Attachment 1 illustrates the updated outreach plan as compared to the plan detailed in Advice 4722-E-A. This supplement also provides the final version of a sample bill, as Attachment 2, which illustrates the placement of the High Usage surcharge along with draft language for the on-bill message. This bill presentment has been vetted with and verbally agreed to by Energy Division staff.

### **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 16, 2016, 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, 4<sup>th</sup> 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  
c/o Megan Lawson  
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, August 26, 2016 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 R.12-06-013. 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 R.12-06-013  
Jason Keyes, Keyes, Fox & Wiedman LLP  
Brad Heavner, California Solar Energy Industries Association (CALSEIA)



# 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: Yvonne Yang

Phone #: (415) 973-2094

E-mail: QXY1@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) #: **4722-E-B**

Tier: **2**

Subject of AL: **Second Supplemental: PG&E's Outreach and Education Plan for Implementing the Super User Electric Surcharge per D.15-07-001**

Keywords (choose from CPUC listing): **Compliance, Billing, Surcharges**

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: **Decision 15-07-001**

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: **August 26, 2016**

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**

**Energy Division**

**EDTariffUnit**

**505 Van Ness Ave., 4<sup>th</sup> Flr.**

**San Francisco, CA 94102**

**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**

**Attn: Erik Jacobson**

**Director, Regulatory Relations**

**c/o Megan Lawson**

**77 Beale Street, Mail Code B10C**

**P.O. Box 770000**

**San Francisco, CA 94177**

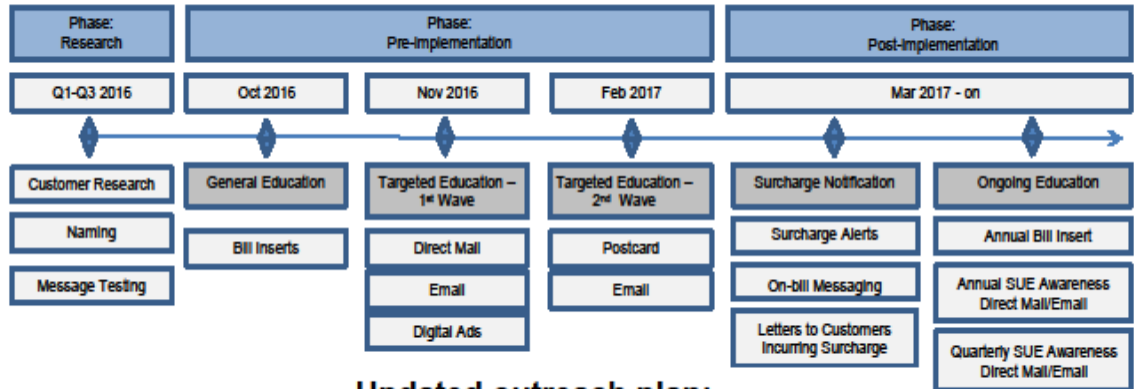
**E-mail: PGETariffs@pge.com**

# **Attachment 1**

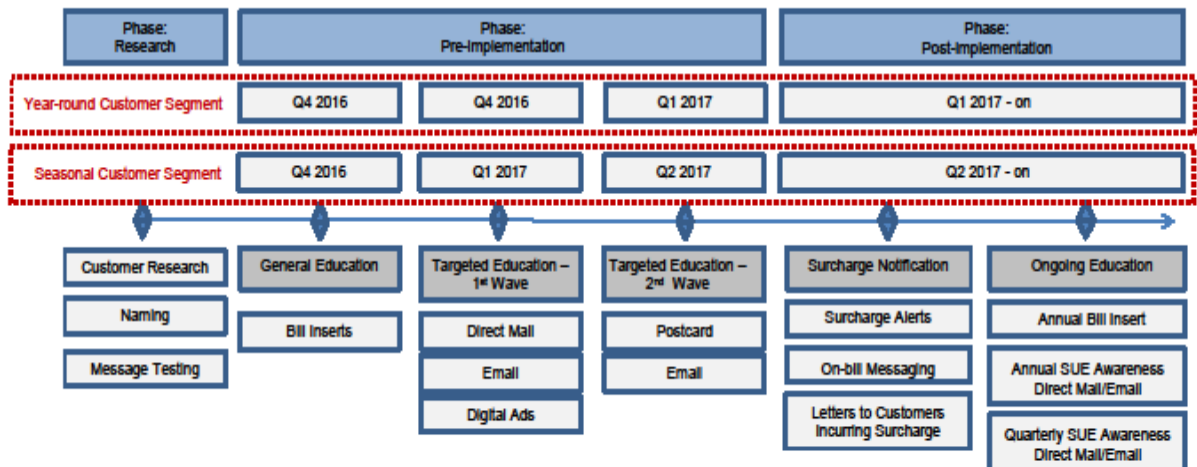
## **Updated Outreach Plan**

## Attachment 1 – Updated Outreach Plan

### Plan as proposed in Advice 4722-E-A):



### Updated outreach plan:



- The marketing outreach communications are **identical and unchanged** between current and proposed plans.
- The only change is the **timing of the waves**, which is designed to better **align** with the timing of the surcharge to enable applicable customer segments to act when most appropriate. In addition, the timing of outreach has been adjusted to **quarterly** rather than monthly to allow for implementation flexibility.



## **Attachment 2**

### **Sample Bill Presentment**

# Attachment 2 – Sample Bill Presentment

## Page 1 of the Energy Statement



### ENERGY STATEMENT

www.pge.com/MyEnergy

DRAFT

Account No: 1023456789-0

Statement Date: mm/dd/yyyy

Due Date: 12/06/2016

#### Service For:

Sally Johnson  
1234 Main Street  
Anytown, CA 00000

#### Your Account Summary

|  |          |
|--|----------|
| Amount Due on Previous Statement         | \$145.67 |
| Payment(s) Received Since Last Statement | -145.67  |
| <hr/>                                    |          |
| Previous Unpaid Balance                  | \$0.00   |
| Current Electric Charges                 | \$177.62 |
| Current Gas Charges                      | 24.58    |

#### Questions about your bill?

24 hours per day, 7 days per week  
Phone: 1-800-743-5000  
www.pge.com/MyEnergy

#### Local Office Address

1234 Office St  
City, CA 00000

**Total Amount Due by 12/06/2016 \$202.18**

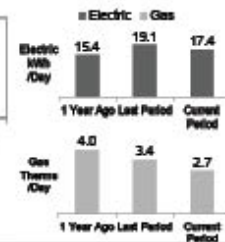


You have been charged for High Usage

#### Monthly Billing History



#### Daily Usage Comparison



Visit [www.pge.com/MyEnergy](http://www.pge.com/MyEnergy) for a detailed bill comparison.

Please return this portion with your payment. No staples or paper clips. Do not fold. Thank you.

9 9 9 0 1 2 3 4 5 6 7 8 9 0 1 0 0 0 0 X X X Font FPO 0 0 0 0 0 X X X



|  |                                |                                      |   |
|--|--------------------------------|--------------------------------------|---|
| Account Number:<br><b>1023456789-0</b> | Due Date:<br><b>12/06/2016</b> | Total Amount Due:<br><b>\$202.18</b> | Amount Enclosed:<br>\$ <input type="text"/> |
|--|--------------------------------|--------------------------------------|---|

9184.2.8.743 2 8P 0.860

SALLY JOHNSON  
1234 MAIN STREET  
ANYTOWN, CA 00000

PG&E  
BOX 997300  
SACRAMENTO, CA 95899-7300



Page X of Y  
Recycled Paper  
30% Post-Consumer Waste

Sample Details of Electric Charges Sample (actual bill message may vary)



**ENERGY STATEMENT**

[www.pge.com/MyEnergy](http://www.pge.com/MyEnergy)

Account No: 1023456789-0  
 Statement Date: mm/dd/yyyy  
**Due Date: 12/06/2016**

**Details of Electric Charges**

mm/dd/yyyy - mm/dd/yyyy (11 billing days)

Service For: 1234 Main Street  
 Service Agreement ID: 9087654321  
 Rate Schedule: E1 TH [Rate Description]

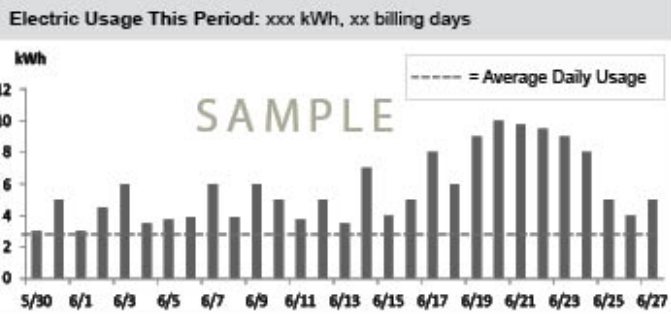
| mm/dd/yyyy - mm/dd/yyyy | Your Tier Usage | 1                        | 2         |          |
|-------------------------|-----------------|--------------------------|-----------|----------|
| Tier 1 Allowance        | 111.100000 kWh  | (11 days x 10.1 kWh/day) |           |          |
| Tier 1 Usage            | 111.100000 kWh  | @                        | \$0.17736 | \$ 19.70 |
| Tier 2 Usage            | 333.300000 kWh  | @                        | \$0.24363 | 81.20    |
| High Usage              | 223.649000 kWh  | @                        | \$0.33832 | 75.66    |
| Energy Commission Tax   |                 |                          |           | 1.06     |

**Total Electric Charges \$177.62**

**Service Information**

Meter # 1098765432  
 Total Usage 668.049000 kWh  
 Baseline Territory T  
 Heat Source Electric  
 Serial Y  
 Rotating Outage Block 50

**HIGH USAGE:** Your current energy consumption this month exceeded 4 times your Baseline Energy Allowance, which is significantly above typical household usage. As a result, you have incurred a charge for this High Usage. Please visit [pge.com/ku](http://pge.com/ku) to take advantage of tools, free programs, and cost-saving tips to help reduce your energy consumption and decrease your likelihood of incurring this charge in the future.



Visit [www.pge.com/myenergy](http://www.pge.com/myenergy) for a detailed bill comparison.

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

|   |   |  |
|---|---|--|
| AT&T  | Division of Ratepayer Advocates                           | Office of Ratepayer Advocates                              |
| Albion Power Company                          | Don Pickett & Associates, Inc.                            | OnGrid Solar   |
| Alcantar & Kahl LLP                           | Douglass & Liddell  | Pacific Gas and Electric Company                           |
| Anderson & Poole                              | Downey & Brand  | Praxair  |
| Atlas ReFuel                                  | Ellison Schneider & Harris LLP                            | Regulatory & Cogeneration Service, Inc.                    |
| BART  | Evaluation + Strategy for Social Innovation               | SCD Energy Solutions                                       |
| Barkovich & Yap, Inc.                         | G. A. Krause & Assoc.                                     | SCE  |
| Bartle Wells Associates                       | GenOn Energy Inc.   | SDG&E and SoCalGas   |
| Braun Blaising McLaughlin & Smith, P.C.       | GenOn Energy, Inc.  | SPURR  |
| Braun Blaising McLaughlin, P.C.               | Goodin, MacBride, Squeri, Schlotz & Ritchie               | San Francisco Water Power and Sewer                        |
| CENERGY POWER                                 | Green Charge Networks                                     | Seattle City Light   |
| CPUC  | Green Power Institute                                     | Sempra Energy (Socal Gas)                                  |
| California Cotton Ginners & Growers Assn      | Hanna & Morton  | Sempra Utilities   |
| California Energy Commission                  | International Power Technology                            | SoCalGas   |
| California Public Utilities Commission        | Intestate Gas Services, Inc.                              | Southern California Edison Company                         |
| California State Association of Counties      | Kelly Group   | Spark Energy   |
| Calpine                                       | Ken Bohn Consulting                                       | Sun Light & Power  |
| Casner, Steve                                 | Leviton Manufacturing Co., Inc.                           | Sunshine Design  |
| Center for Biological Diversity               | Linde   | Tecogen, Inc.  |
| City of Palo Alto                             | Los Angeles County Integrated Waste Management Task Force | TerraVerde Renewable Partners, LLC                         |
| City of San Jose                              | Los Angeles Dept of Water & Power                         | Tiger Natural Gas, Inc.                                    |
| Clean Power                                   | MRW & Associates  | TransCanada  |
| Clean Power Research                          | Manatt Phelps Phillips                                    | Troutman Sanders LLP                                       |
| Coast Economic Consulting                     | Marin Energy Authority                                    | Utility Cost Management                                    |
| Commercial Energy                             | McKenna Long & Aldridge LLP                               | Utility Power Solutions                                    |
| Cool Earth Solar, Inc.                        | McKenzie & Associates                                     | Utility Specialists  |
| County of Tehama - Department of Public Works | Modesto Irrigation District                               | Verizon  |
| Crossborder Energy                            | Morgan Stanley  | Water and Energy Consulting                                |
| Davis Wright Tremaine LLP                     | NLine Energy, Inc.  | Wellhead Electric Company                                  |
| Day Carter Murphy                             | NRG Solar   | Western Manufactured Housing Communities Association (WMA) |
| Defense Energy Support Center                 | Nexant, Inc.  | YEP Energy   |
| Dept of General Services                      | ORA   |  |