

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 9, 2015

Advice Letter 3538-G/4544-E and 3538-G-A/4544-E-A

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

Subject: Request of PG&E, SDG&E, and SoCalGas to Increase the Incentive Level for a Measure Offered in the Statewide Commercial Energy Efficiency Program and Supplemental Filing

Dear Ms. Allen:

Advice Letter 3538-G/4544-E and 3538-G-A/4544-E-A are effective January 1, 2015.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division



Meredith Allen
Senior 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

December 5, 2014

Advice 3538-G/4544-E

(Pacific Gas and Electric Company - U 39 M)

Advice 2677-E/2341-G

(San Diego Gas & Electric Company - U902 M)

Advice 4723-G

(Southern California Gas Company – U 904 G)

Public Utilities Commission of the State of California

Subject: Request of Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Gas Company to Increase the Incentive Level for a Measure Offered in the Statewide Commercial Energy Efficiency Program

Purpose

Pursuant to Decision (D.) 05-09-043, Pacific Gas and Electric Company (PG&E), on behalf of itself, San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas), together the Investor Owned Utilities (IOUs), hereby submits for approval an increase to an incentive level for an energy efficiency measure offered in the Statewide Commercial Energy Efficiency (EE) Program.

Background

This joint advice letter (AL) requests a change in incentive levels for a statewide measure offered in the IOUs' Statewide Commercial EE Program, where the change may exceed 50 percent of the original incentive level. This AL is required, consistent with guidance provided by the California Public Utilities Commission's (Commission or CPUC) Energy Division Director on January 22, 2014, in the Letter of Disposition to

SCE AL 2979-E, which states: "D.05-09-043 *does* require an AL filing if the incentive change exceeds 50%."¹

Request For Approval

The IOUs request approval effective January 1, 2015, for a change in the incentive structure for its Commercial Griddles measure offered in each IOU's respective Commercial Deemed Program.

The current rebate levels are \$125 per unit for a gas griddle and \$300 per unit for an electric griddle. These incentive levels are proving to be insufficient to incent adoption of these measures. The proposed rebates effective 2015 are \$100 per foot for gas, and \$150 per foot for electric. Based on the size of the appliance, the new rebate levels could result in an increase of more than 50 percent (e.g., a four-foot electric griddle would receive a rebate of \$600 in 2015, versus the current per unit rebate of \$300).

The new incentive structure would more appropriately offset the cost of the appliance, and increase adoption of Commercial Griddles to realize the potential savings in the food service market for this appliance.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 26, 2014, which is 21 days² 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.

¹ Please note that the Energy Efficiency Policy Manual Version 5 (July 2013), issued on August 23, 2013, incorporated, without reference to D.05-09-043, clarification from Assigned Commissioner Ruling dated December 22, 2011, stating: "Changes to incentive levels or modifications to program design (such as changes to customer eligibility requirements) will not trigger Energy Division or formal Commission review. Program administrators will notify the Commission of all incentive level changes that take place through the Program Implementation Plan Addendum process" (see Attachment A, p. 2).

² The 20-day protest period concludes on a holiday. PG&E is hereby moving this date to the following business day.

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

For SDG&E:

Attn: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1879
E-mail: MCaulson@semprautilities.com

For SoCalGas:

Sid Newsom
Tariff Manager – GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile: (213) 244-4957
E-mail: snewsom@semprautilities.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

The IOUs request that this Tier 2 advice letter be approved on regular notice with the effective date of January 1, 2015 so that the incentive change applies to the whole 2015 EE program year.

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.13-11-005. 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>. SDG&E and SoCalGas will separately serve their General Order 96-B service lists.

/S/

Meredith Allen
Senior Director, Regulatory Relations

cc: Service List R.13-11-005

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 M)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Kingsley Cheng

Phone #: (415) 973-5265

E-mail: k2c0@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

(Date Filed/ Received Stamp by CPUC)

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

Advice Letter (AL) #: **3538-G/4544-E, et al.**

Tier: **2**

Subject of AL: **Request of Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Gas Company to Increase the Incentive Level for a Measure Offered in the Statewide Commercial Energy Efficiency Program**

Keywords (choose from CPUC listing): Compliance, Energy Efficiency

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.05-09-043

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: **January 1, 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 21 days¹ 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: Meredith Allen

Senior Director, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

¹ The 20-day protest period concludes on a holiday. PG&E is hereby moving this date to the following business day.

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

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