

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 21, 2015

**Advice Letters: 3568-G/4594-E
3568-G-A/4594-E-A**

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: Implementation of SmartMeter™ Opt Out Phase 2 Decision 14-12-078: Revise the SmartMeter™ Opt-Out Program Balancing Accounts, Electric and Gas Rate Schedules E-SOP and G-SOP, and Electric and Gas Rule 9

Dear Mr. Jacobson:

Advice Letter 3568-G/4594-E and 3568-G-A/4594-E-A are effective as of January 15, 2015, per Resolution E-4723 Ordering Paragraphs.

Sincerely,

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

Edward Randolph
Director, Energy Division

September 25, 2015

Advice 3568-G-A/4594-E-A

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Supplemental: Implementation of SmartMeter™ Opt Out Phase 2
Decision 14-12-078: Revise the SmartMeter™ Opt-Out Program
Balancing Accounts, Electric and Gas Rate Schedules E-SOP and
G-SOP, and Electric and Gas Rule 9**

Purpose

In compliance with Resolution E-4723, Pacific Gas and Electric Company (PG&E) submits this supplemental Tier 1 advice letter to revise its electric and gas preliminary statements for its SmartMeter™ Opt-Out Program (SOP) balancing accounts (SOPBA-E and SOPBA-G, respectively). The affected tariff sheets are listed in Attachment 1.

Background

On February 26, 2015, PG&E filed Advice Letter 3568-G/4594-E in compliance with Decision (D.) 14-12-078 to revise its Electric and Gas Preliminary Statements (Parts GK and DF, respectively) for its SmartMeter™ Opt-Out Program (SOP) balancing accounts (SOPBA-E and SOPBA-G), Electric and Gas Rate Schedules (E-SOP and G-SOP), and Electric and Gas Rule 9.

On September 18, 2015, the California Public Utilities Commission (CPUC or Commission) issued Resolution E-4723, which approved, with modifications, PG&E's Advice Letter 3568-G/4594-E. In Resolution E-4723, the CPUC directed PG&E to file a supplemental advice letter within ten days to

- “a) remove the tariff language from its gas and electric smart meter opt-out balancing account that provides for debits for reinstalling a smart meter if a customer moves, no longer wishes to participate, or is removed from the opt-out program, and b) add tariff language that specifically excludes all “exit-fee” costs, “turn off” costs, or “exit costs” from being debited into the smart meter opt-out balancing account.” (OP 2)

- “establish a sub-account in their smart meter opt-out balancing accounts to track incremental costs in excess of the authorized opt-out program costs.” (OP 8)
- specify that PG&E will “fully implement bi-monthly meter reading as soon as possible but no later than March 1, 2016.” (OP 9)

Tariff Revisions

Revise Electric Preliminary Statement Part GK, SmartMeter™ Opt-Out Program Balancing Account – Electric (SOPBA-E) and Gas Preliminary Statement Part DF, SmartMeter™ Opt-Out Program Balancing Account – Gas (SOPBA-G)

In compliance with Resolution E-4723, OP 2, PG&E proposes to revise the existing Electric Preliminary Statement Part GK, SmartMeter™ Opt-Out Program Balancing Account – Electric (SOPBA-E), and Gas Preliminary Statement Part DF, SmartMeter™ Opt-Out Program Balancing Account – Gas (SOPBA-G) to “a) remove tariff language ... that provides for debits for reinstalling a smart meter if a customer moves, no longer wish to participate, or is removed from the opt-out program, and b) add tariff language that specifically excludes all “exit-fee” costs, “turn off” costs, or “exit costs” from being debited into the smart meter opt-out balancing account.”

In compliance with OP 8, PG&E proposes to revise the existing Electric Preliminary Statement Part GK, SmartMeter™ Opt-Out Program Balancing Account – Electric (SOPBA-E), and Gas Preliminary Statement Part DF, SmartMeter™ Opt-Out Program Balancing Account – Gas (SOPBA-G) to establish the “Incremental SmartMeter™ Opt-Out Cost Subaccount” to track incremental costs in excess of its authorized SmartMeter™ opt-out program costs.

Revise Electric and Gas Rule No. 9 – Rendering and Payment of Bills

In compliance with Resolution E-4723, OP 9, PG&E proposes to amend its previously proposed changes to Electric and Gas Rule No. 9, Section O, SmartMeter™ Opt-Out – Bi-Monthly Meter Reading, to specify that PG&E will fully implement bi-monthly meter reading as soon as possible but no later than March 1, 2016. PG&E expects to implement bi-monthly meter reading by year-end 2015.

This filing will 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 October 15, 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
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 1 advice filing become effective on January 1, 2015.

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 lists for A.11-03-014 and A.12-11-009. 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.11-03-014 and A.12-11-009

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) #: **3568-G-A/4594-E-A**

Tier: 1

Subject of AL: **Supplemental: Implementation of SmartMeter™ Opt Out Phase 2 Decision 14-12-078: Revise the SmartMeter™ Opt-Out Program Balancing Accounts, Electric and Gas Rate Schedules E-SOP and G-SOP, and Electric and Gas Rule 9**

Keywords (choose from CPUC listing): Compliance, Rules

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.14-12-078 and E-4723

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: **14**

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: **Gas Preliminary Statement Part DF, Gas Rule 9, Electric Preliminary Statement Part GK, and Electric Rule 9**

Service affected and changes proposed: **Please 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

**ATTACHMENT 1
Advice 3568-G-A**

**Cal P.U.C.
Sheet No.**

Title of Sheet

**Cancelling Cal
P.U.C. Sheet No.**

32304-G	GAS PRELIMINARY STATEMENT PART DF SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - GAS (SOPBA-G) Sheet 1	31537-G
32305-G	GAS PRELIMINARY STATEMENT PART DF SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - GAS (SOPBA-G) Sheet 2	31538-G
32306-G	GAS PRELIMINARY STATEMENT PART DF SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - GAS (SOPBA-G) Sheet 3	31539-G
32307-G	GAS RULE NO. 9 RENDERING AND PAYMENT OF BILLS Sheet 9	
32308-G	GAS TABLE OF CONTENTS Sheet 1	32267-G
32309-G	GAS TABLE OF CONTENTS Sheet 5	32213-G
32310-G	GAS TABLE OF CONTENTS Sheet 6	32137-G



GAS PRELIMINARY STATEMENT PART DF
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - GAS (SOPBA-G)

Sheet 1

DF. SmartMeter™ Opt-Out Program Balancing Account - Gas (SOPBA-G)

1. **PURPOSE:** The purpose of the SOPBA-G is to record the difference between actual revenue requirements related to PG&E's SmartMeter™ Opt-Out Program as approved in Decision (D.) 14-12-078 and the associated revenues from fees received from Opt-Out Program participants. The Opt-Out Program provides an option for residential customers who do not wish to have a wireless SmartMeter™ installed at their residences. PG&E shall record the revenue requirements associated with the SmartMeter™ Opt-Out Program costs and revenues in a two-way balancing account for future recovery of these revenue requirements. Costs that can be attributed specifically to gas service will be recorded to this account. General costs that cannot be attributed specifically either to providing gas service or electric service shall be allocated 55% electric and 45% gas. All revenues from the gas portion of the charges (i.e., initial amount and monthly charge) from participating customers will be credited to the SOPBA-G. Pursuant to D.14-12-078, all "exit-fee" costs, "turn off" costs, or "exit costs" are prohibited from being recorded in this account.

(N)
 (N)

2. **APPLICABILITY:** The SOPBA-G shall apply to gas residential customers only, except for those specifically excluded by the Commission.

3. **REVISION DATE:** Disposition of the balance in this account shall be determined by the Commission in a future proceeding.

4. **RATES:** The SOPBA-G rate component is set forth in Gas Rate Schedule G-SOP.

5. **ACCOUNTING PROCEDURE:** The SOPBA-G includes the following subaccount:

(T)

INCREMENTAL COST SUBACCOUNT: The purpose of this subaccount is to track and record incremental SmartMeter™ opt-out costs in excess of the authorized SmartMeter™ opt-out programs costs.

(N)
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 (N)

PG&E shall maintain the SOPBA-G by making entries to this account at the end of each month, as applicable:

(T)

a) A debit entry equal to the gas portion of PG&E's actual incremental Operating and Maintenance (O&M) and Administrative and General (A&G) operating expenses and capital-related revenue requirements, excluding associated Franchise Fees and Uncollectibles (FF&U) expense, incurred for all the activities PG&E is required to undertake to manage the SmartMeter™ Opt-Out Program. The capital-related revenue requirements will include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installing equipment, including the ongoing capital revenue requirements associated with capital additions since inception of the program. These capital, O&M, and A&G costs include implementation costs associated with the activities described below and may relate to numerous activities or organizations, including but not limited to:

- The expenses for customer outreach, Call Center communications, and other written and oral communications regarding the SmartMeter™ Opt-Out Program.
- The expenses for customer operations activities, such as managing enrollment, changing of parties following starts/stops in service, revising meter-reading routes, handling and responding to customer requests, all related billing and payment processes, and all associated employee-training and communications.
- The expenses for bi-monthly meter reading of the gas analog mechanical meters.

(Continued)



GAS PRELIMINARY STATEMENT PART DF
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - GAS (SOPBA-G)

Sheet 2

5. ACCOUNTING PROCEDURE (Cont'd)

- The expenses related to testing analog meters to comply with Commission Rule 17 and the Commission's Direct Access standards for metering and meter data in California.
- The expenses for ongoing engineering, monitoring the integrity of the SmartMeter™ mesh network needed as new customers request analog meters and identifying where additional network devices must be installed to maintain communications system integrity.
- The expenses for any incremental increase in uncollectible expenses in excess of those projected in the utility's last general rate case that are attributable to the SmartMeter™ Opt-Out Program.
- The expenses for program administration, including regulatory reporting.
- The expenses associated with benefits that SmartMeters™ would have provided had they been in place as anticipated in D.06-07-027 and D.09-03-026, including but not limited to manual processing of service-terminations, manual checks of lost service, and manual restoration of service that SmartMeters™ could have performed remotely.
- The expenses associated with information technology projects, upgrades, or equipment used to manage the 36-month limitation on customer fees and/or bi-monthly meter-reading.
- The capital cost of purchasing analog meters for residential gas customers who wish to replace the wireless SmartMeter™ installed at their residences, including procurement, materials handling, and inventory costs.
- The capital cost of removing the gas SmartMeter™ module on gas mechanical meters for residential gas customers who wish to replace the wireless SmartMeter™ module installed at their residences, retiring the module, and installing a new face plate on the gas analog mechanical meters, including removal, procurement, materials handling, and inventory costs. For those modules that are not retired but are refurbished and reused, these costs will be expensed.
- The capital cost of purchasing up to 200 hand-held meter-reading devices and for programming PG&E's Information Technology (IT) systems to receive the meter-reading data.

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 (D)

(Continued)



GAS RULE NO. 9
 RENDERING AND PAYMENT OF BILLS

Sheet 9

O. SMARTMETER™ OPT-OUT – BI-MONTHLY METER READING

For customers participating in the SmartMeter™ Opt-Out Program, PG&E will read the meters on a bi-monthly (every two months) basis. Pursuant to Resolution E-4723, PG&E will implement bi-monthly meter reading as soon as possible but no later than March 1, 2016. PG&E will provide an estimated bill in months when the meter is not read and true-up the bill following the next meter read.

(N)
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 (N)



GAS TABLE OF CONTENTS

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page	32308-G	(T)
Rate Schedules	32268,32180-G	
Preliminary Statements.....	31868, 32309-G	(T)
Rules	32310-G	(T)
Maps, Contracts and Deviations.....	31544-G	
Sample Forms	30592,30323,30324,30325,32138,30439-G	

(Continued)



GAS TABLE OF CONTENTS

Sheet 5

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements		
Part AC	Catastrophic Event Memorandum Account	14178,14179-G
Part AE	Core Pipeline Demand Charge Account.....	29525,30644-G
Part AG	Core Firm Storage Account.....	2888-G
Part AN	Hazardous Substance Mechanism.....	23281-23283,16693-16694-G
Part AW	Self-Generation Program Memorandum Account	24767-G
Part BA	Public Purpose Program-Energy Efficiency.....	23360-23361-G
Part BB	Public Purpose Program Memorandum Account	23362-23363-G
Part BH	Public Purpose Program Surcharge-Low Income Energy Efficiency Balancing Account.....	23364-G
Part BI	Public Purpose Program Surcharge-Research, Development and Demonstration Balancing Account.....	23365,23366-G
Part BL	Noncore Distribution Fixed Cost Account.....	28415-G
Part BQ	Pension Contribution Balancing Account	24853,24224-G
Part BS	Climate Balancing Account	29772-G
Part BT	Non-Tariffed Products and Services Balancing Account.....	26710-G
Part BW	Energy Efficiency 2009 – 2011 Memorandum Account.....	28304,27419-G
Part CA	California Solar Initiative Thermal Program Memorandum Account.....	28670,28060-G
Part CB	CARE/TANF Balancing Account	28103-G
Part CE	San Bruno Independent Review Panel Memorandum Account (SBIRPMA)	28559-G
Part CE	San Bruno Independent Review Panel Memorandum Account (SBIRPMA)	28559-G
Part CF	Meter Reading Costs Memorandum Account.....	28599-G
Part CG	Distribution Integrity Management Expense Memorandum Account	28641-G
Part CI	AB32 Cost of Implementation Fee Memorandum Account – Gas	28673-G
Part CK	TID Almond Power Plant Balancing Account	28889-G
Part CL	Integrity Management Expense Balancing Account	28891-G
Part CM	Gas Operational Cost Balancing Account	30645-30646-G
Part CN	Topock Adder Projects Balancing Account	28893-G
Part CO	Adjustment Mechanism For Costs Determined In Other Proceedings	28894-28897-G
Part CP	Gas Transmission & Storage Revenue Sharing Mechanism.....	28898,30647-30649-G
Part CS	Tax Act Memorandum Account – Gas	30271,30272-G
Part CT	Low Income 2012 Memorandum Account (LIMA)	29350, 29351-G
Part CV	Revised Customer Energy Statement Balancing Account - Gas (RCESBA-G)	29617-G
Part CW	Gas Pipeline Expense and Capital Balancing Account	31679,30510,31680-G
Part CX	Core Gas Pipeline Safety Balancing Account	31681,31682-G
Part CY	NonCore Gas Pipeline Safety Balancing Account.....	31683,31684-G
Part CZ	California Energy Systems for the 21st Century Balancing Account	30264*-G
Part DA	Statewide Marketing, Education and Outreach Expenditure Balancing Account.....	30434-G
Part DC	Energy Data Center Memorandum Account – Gas	31288-G
Part DD	Gas Transmission & Storage Memorandum Account (GTSMA)	31340-31344-G
Part DE	Gas Leak Survey and Repair Balancing Account (GLSRBA).....	32210,32211,31826-G
Part DF	SmartMeter™ Opt-Out Program Balancing Account – Gas (SOPBA-G).....	32304,32305,32306-G (T)
Part DG	Disconnection Memorandum Account - Gas (DMA-G).....	31695-G
Part DH	Gas Programs Balancing Account (GPBA)	31829,31830-G
Part DI	Greenhouse Gas Expense Memorandum Account - Gas (GHGEMA-G)	31831-G
Part DJ	Energy Efficiency Financing Balancing Account - Gas (EEFBA-G).....	32040*,32041*,32042*-G

(Continued)



GAS TABLE OF CONTENTS

Sheet 6

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Rules		
Rule 01	Definitions.....	31083,26782,25123,18197,26823,26824,24120,18200, 22924,29263, 29264,29265,29266,29267,29268,29269,29270-G
Rule 02	Description of Service.....	23062-23066,26825-G
Rule 03	Application for Service.....	27248,27249-G
Rule 04	Contracts.....	17051-G
Rule 05	Special Information Required on Forms.....	30088,13348-13349-G
Rule 06	Establishment and Reestablishment of Credit.....	22126,30687,31329-G
Rule 07	Deposits.....	31330,28655-G
Rule 08	Notices.....	31331,17580,30688,30689,15728-G
Rule 09	Rendering and Payment of Bills.....	24128,24129,27941,23518,31332, 27345,27346,28562, 32307-G
Rule 10	Disputed Bills.....	18214-18216-G
Rule 11	Discontinuance and Restoration of Service.....	31699,31333*,18219,18220,27251,23520, 18223,18224,18225,18226,18227,27252,31334,19710-G
Rule 12	Rates and Optional Rates.....	18229,27253,24132,21981-21982,24474-G
Rule 13	Temporary Service.....	22832-G
Rule 14	Capacity Allocation and Constraint of Natural Gas Service.....	18231-18235,30690-30698,28283, 30699-30702, 29787, 28289,28290,30703,28292-G
Rule 15	Gas Main Extensions.....	21543,18802-18803,31117,20350,29271,29272,26827,21544, 21545,22376,22377-22379,26828,26829,18814-G
Rule 16	Gas Service Extensions.....	21546,18816,17728,17161,18817,18818,18819,18820,18821, 18822,29273,18824,18825,17737,18826,18827-G
Rule 17	Meter Tests and Adjustment of Bills for Meter Error.....	14450,28656,28764,28770,28771, 28772,28773,28774-G
Rule 17.1	Adjustment of Bills for Billing Error.....	22936,28657,29274-G
Rule 17.2	Adjustment of Bills for Unauthorized Use.....	22937,14460,14461-G
Rule 18	Supply to Separate Premises and Submetering of Gas.....	22790,17796,13401-G
Rule 19	Medical Baseline Quantities.....	21119,21120,21121-G
Rule 19.1	California Alternate Rates for Energy for Individual Customers and Submetered Tenants of Master-Metered Customers.....	31214,31215,30445,28210-G
Rule 19.2	California Alternate Rates for Energy for Nonprofit Group-Living Facilities.....	24609,31216,17035,31217,30448-G
Rule 19.3	California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities	24138,31218,31219,27256-G
Rule 21	Transportation of Natural Gas.....	27591,31478,31479,31872,23194,23195,21845,23196, 23197,23198,23199,29228,29229,31955,29231, 31956-31958,31567,31568-31965,31575-31578-G
Rule 21.1	Use of Pacific Gas and Electric Company's Firm Interstate Rights.....	20461,18260,18261-G
Rule 23	Gas Aggregation Service for Core Transport Customers.....	29275,18263,26664,18265, 26665-26666,24825,24826,24827,24828,29276,29277,26667,24832-24833, 24849,29278,-29279,18272-G,29248,29249,29250,29251,29252,29253,29254, 29255,29256-G
Rule 25	Gas Services-Customer Creditworthiness and Payment Terms.....	28816-28828-G
Rule 26	Standards of Conduct and Procedures Related to Transactions with Intracompany Departments, Reports of Negotiated Transactions, and Complaint Procedures ...	18284,18285,18633,30704-G
Rule 27.1	Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data	31387-31391-G
Rule 28	Mobilehome Park Utility Upgrade Program.....	31772*-31777,32133,32134-G

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(Continued)

**Cal P.U.C.
Sheet No.**

Title of Sheet

**Cancelling Cal
P.U.C. Sheet No.**

35625-E	ELECTRIC PRELIMINARY STATEMENT PART GK SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - ELECTRIC (SOPBA-E) Sheet 1	34519-E
35626-E	ELECTRIC PRELIMINARY STATEMENT PART GK SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - ELECTRIC (SOPBA-E) Sheet 2	34520-E
35627-E	ELECTRIC PRELIMINARY STATEMENT PART GK SMARTMETER(TM) OPT-OUT PROGRAM BALANCING ACCOUNT - ELECTRIC (SOPBA-E) Sheet 3	34521-E
35628-E	ELECTRIC RULE NO. 9 RENDERING AND PAYMENT OF BILLS Sheet 9	
35629-E	ELECTRIC TABLE OF CONTENTS Sheet 1	35592-E
35630-E	ELECTRIC TABLE OF CONTENTS PRELIMINARY STATEMENT Sheet 18	35458-E
35631-E	ELECTRIC TABLE OF CONTENTS RULES Sheet 19	35097-E



ELECTRIC PRELIMINARY STATEMENT PART GK
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - ELECTRIC (SOPBA-E)

Sheet 1

GK. SmartMeterTM Opt-Out Program Balancing Account - Electric (SOPBA-E)

1. **PURPOSE:** The purpose of the SOPBA-E is to record the difference between actual revenue requirements related to PG&E's SmartMeterTM Opt-Out Program as approved in Decision (D.) 14-12-078 and the associated revenues from fees received from Opt-Out Program participants. The Opt-Out Program provides an option for residential customers who do not wish to have a wireless SmartMeterTM installed at their residences. PG&E shall record the revenue requirements associated with the SmartMeterTM Opt-Out Program costs and revenues in a two-way balancing account for future recovery of these revenue requirements. Costs that can be attributed specifically to electric service will be recorded to this account. General costs that cannot be attributed specifically either to providing gas service or electric service shall be allocated 55% electric and 45% gas. All revenues from the electric portion of the charges (i.e., initial amount and monthly charge) from participating customers will be credited to the SOPBA-E. Pursuant to D.14-12-078, all "exit-fee" costs, "turn off" costs, or "exit costs" are prohibited from being recorded in this account.

(N)
 |
 (N)

2. **APPLICABILITY:** The SOPBA-E shall apply to electric residential customers only, except for those specifically excluded by the Commission.

3. **REVISION DATE:** Disposition of the balance in this account shall be determined by the Commission in a future proceeding.

4. **RATES:** The SOPBA-E rate component is set forth in Electric Rate Schedule E-SOP.

5. **ACCOUNTING PROCEDURE:** The SOPBA-E includes the following subaccount:

(T)

INCREMENTAL COST SUBACCOUNT: The purpose of this subaccount is to track and record incremental SmartMeterTM opt-out costs in excess of the authorized SmartMeterTM opt-out programs costs.

(N)
 |
 (N)

PG&E shall maintain the SOPBA-E by making entries to this account at the end of each month, as applicable:

(T)

a) A debit entry equal to the electric portion of PG&E's actual incremental Operating and Maintenance (O&M) and Administrative and General (A&G) operating expenses and capital-related revenue requirements, excluding associated Franchise Fees and Uncollectibles (FF&U) expense, incurred for all the activities PG&E is required to undertake to manage the SmartMeterTM Opt-Out Program. The capital-related revenue requirements will include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installing equipment, including the ongoing capital revenue requirements associated with capital additions since inception of the program. These capital, O&M, and A&G costs include implementation costs associated with the activities described below and may relate to numerous activities or organizations, including but not limited to:

- The expenses for customer outreach, Call Center communications, and other written and oral communications regarding the SmartMeterTM Opt-Out Program.
- The expenses for customer operations activities, such as managing enrollment, changing of parties following starts/stops in service, revising meter-reading routes, handling and responding to customer requests, all related billing and payment processes, and all associated employee-training and communications.

(L)

(Continued)



ELECTRIC PRELIMINARY STATEMENT PART GK
SMARTMETER(TM) OPT-OUT PROGRAM
BALANCING ACCOUNT - ELECTRIC (SOPBA-E)

Sheet 2

5. ACCOUNTING PROCEDURE (Cont'd)

- The expenses for bi-monthly meter reading of any electric analog meters, and in limited cases, the solid-state digital meters for those residential electric customers on rate schedules that require special meters. (L)
 |
 (L)
- The expenses related to testing analog meters, and, in limited cases, the solid-state digital meters for those residential electric customers on rate schedules that require special meters, in order to comply with Commission Rule 17 and the Commission's Direct Access standards for metering and meter data in California.
- The expenses for monitoring the integrity of the SmartMeter™ mesh network as customer opt-outs create gaps in the network, including engineering, and identifying where additional network devices should be added for system integrity.
- The expenses for any incremental increase in uncollectible expenses in excess of those projected in the utility's last general rate case that are attributable to the SmartMeter™ Opt-Out Program.
- The expenses for program administration, including regulatory reporting.
- The expenses associated with benefits that SmartMeters™ would have provided had they been in place as anticipated in D.06-07-027 and D.09-03-026, including but not limited to manual processing of service-terminations, manual checks of lost service, and manual restoration of service that SmartMeters™ could have performed remotely.
- The expenses associated with information technology projects, upgrades, or equipment used to manage the 36-month limitation on customer fees and/or bi-monthly meter-reading.
- The capital cost of purchasing analog meters for residential electric customers who wish to replace the wireless SmartMeter™ installed at their residences, including procurement, materials handling, and inventory costs. For the great majority of customers, these meters will be analog electromechanical meters. For a very small number of residential electric customers on rate schedules that require special meters (e.g., Time-of-Use customers), these meters will be solid-state digital meters.
- The capital cost of replacing the electric SmartMeters™ with the electric analog meters, and in limited cases the solid-state digital meters for those residential electric customers on rate schedules that require special meters. (D)
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 (D)
- The capital cost of purchasing up to 200 hand-held meter-reading devices and for programming PG&E's Information Technology (IT) systems to receive the meter-reading data.
- The capital cost of purchasing network equipment to compensate for reduced connectivity associated with removal of RF-based meters.

(Continued)



ELECTRIC RULE NO. 9
 RENDERING AND PAYMENT OF BILLS

Sheet 9

O. SMARTMETER™ OPT-OUT – BI-MONTHLY METER READING

For customers participating in the SmartMeter™ Opt-Out Program, PG&E will read the meters on a bi-monthly (every two months) basis. Pursuant to Resolution E-4723, PG&E will implement bi-monthly meter reading as soon as possible but no later than March 1, 2016. PG&E will provide an estimated bill in months when the meter is not read and true-up the bill following the next meter read.

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 (N)



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
	Title Page	35629-E	(T)
	Rate Schedules	35593,35594,35595,35596,35597,35598,35088,31541,34517-E	
	Preliminary Statements	35083,32706,35423,35049,34357,34358,35454, 35630-E	(T)
	Rules	35631 ,35401,35424-E	(T)
	Maps, Contracts and Deviations.....	35044-E	
	Sample Forms	32777,32429,32726,35301,32504,35493,33209,35425,35484,32437,32508,32439-E	

(Continued)



ELECTRIC TABLE OF CONTENTS
PRELIMINARY STATEMENT

Sheet 18

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements (Cont'd)		
Part GA	Greenhouse Gas Expense Memorandum Account.....	32419,32420-E
Part GB	Greenhouse Gas Revenue Balancing Account.....	32421-E
Part GC	California Energy Systems for the 21 st Century Balancing Account.....	33937-E
Part GD	Smart Grid Pilot Deployment Project Balancing Account.....	32540-32542-E
Part GE	Statewide Marketing, Education and Outreach Expenditure Balancing Account.....	32643-E
Part GF	Customer Data Access Balancing Account – Electric.....	33136-E
Part GH	Mobile Home Park Balancing Account - Electric.....	33894-E
Part GI	Energy Data Center Memorandum Account – Electric.....	33940-E
Part GJ	Major Emergency Balancing Account (MEBA).....	34390-E
Part GK	SmartMeter™ Opt-Out Program Balancing Account - Electric (SOPBA-E).....	35625,35626,35627-E
Part GL	Hydro Licensing Balancing Account (HLBA).....	34393-E
Part GM	Nuclear Regulatory Commission Rulemaking Balancing Account (NRCRBA).....	34396-E
Part GN	San Francisco Incandescent Streetlight Replacement Account.....	34364-E
Part GO	Disconnection Memorandum Account - Electric (DMA-E).....	34604-E
Part GP	Green Tariff Shared Renewables Memorandum Account (GTSRMA).....	35356-35358-E
Part GQ	Energy Efficiency Financing Balancing Account – Electric (EEFMA-E).....	35292,35293,35294-E
Part GR	Green Tariff Shared Renewables Balancing Account (GTSRBA).....	35375,35376,35377-E
Part GS	Residential Rate Reform Memorandum Account (RRRMA).....	35455,35456-E

(T)

(Continued)



**ELECTRIC TABLE OF CONTENTS
 RULES**

Sheet 19

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
	Rules	
Rule 01	Definitions..... 25914,16368,14857,28321,27070,23006,14861,30292,30293,30661,30295,30662,30297,30298, 30299,30300,30301,30302,30303,30304,30305,30306,30307,30308,30663,35094,30311, 30312-E	
Rule 02	Description of Service 11257,11896,11611,14079,11261-11263,31319,27764-27767, 11269-11272,27768,11274-75,27769,27770,11278,27071,27771-27774-E	
Rule 03	Application for Service 27798,27799-E	
Rule 04	Contracts..... 34614-E	
Rule 05	Special Information Required on Forms 32168,14192,11289-E	
Rule 06	Establishment and Reestablishment of Credit 21155,34199-E	
Rule 07	Deposits 34200,27800-E	
Rule 08	Notices 34201,14145,20966,14146,13139, 29673-E	
Rule 09	Rendering and Payment of Bills 25145,25146,34305,31455,34202,27862,27863,33447, 35628-E	(T)
Rule 10	Disputed Bills 11308,11309,11310-E	

(Continued)

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

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