

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 29, 2015

Advice Letter 4662-E

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

**SUBJECT: LED Lighting Conversion Options for the City and County of
San Francisco in Compliance with PUC Code Section 384.5**

Dear Mr. Jacobson:

Advice Letter 4662-E is effective as of January 1, 2016.

Sincerely,

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

Edward Randolph
Director, Energy Division

July 1, 2015

Advice 4662-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: LED Lighting Conversion Options for the City and County of San Francisco in Compliance with Public Utilities Code Section 384.5

Purpose

The purpose of this filing is to offer to the City and County of San Francisco (CCSF) options for Light Emitting Diode (LED) conversions of utility owned lights consistent with those offered to other Pacific Gas and Electric Company (PG&E) customers pursuant to Rulemaking (R.) 13-11-005, Ordering Paragraph (OP) 2, directing PG&E, Southern California Edison Company, and San Diego Gas & Electric Company to file tariffs compliant with Public Utilities Code Section 384.5.

Background

On October 7, 2013, AB 719 was approved, adding Section 384.5 to the Public Utilities Code (the Statute). The Statute required the California Public Utilities Commission (Commission or CPUC), on or before March 1, 2014, to order electrical corporations to submit, on or before July 1, 2015, a tariff to be used, at the discretion of local governments, to fund energy efficiency improvements in street light poles owned by the electrical corporations. The Statute states:

384.5. (a) On or before March 1, 2014 the commission shall order electrical corporations to submit, on or before July 1, 2015, a tariff to be used, at the discretion of local governments, to fund energy efficiency improvements in street light poles owned by the electrical corporations to ensure reduced energy consumption for local governments who are streetlight customers covered by these tariffs.

(b) The tariff shall be designed to allow local governments to remit the cost of the improvement through the tariff over time, resulting in reduced energy consumption, without shifting costs to nonparticipating ratepayers. The cost of the improvement shall be identified separately rather than included within the charge for electrical service.

(c) Notwithstanding subdivision (b), the improvement performed pursuant to the tariff submitted under subdivision (a) shall be eligible for any rebate or incentives available through ratepayer-funded programs intended to increase energy efficiency.

(d) The electrical corporation that owns the street light poles shall install or otherwise make the energy efficiency improvements selected by the local government with an appropriately trained workforce in accordance with all applicable safety orders of the commission.

(e) For the purposes of this section, the following terms have the following meanings:

(1) "Electrical Corporation" means an electrical corporation, as defined in Section 218, with at least 100,000 service connections in California.

(2) "Street light pole" means a pole, arm, or fixture used primarily for street, pedestrian, or security lighting.

In Decision (D.) 14-08-032, which addressed Phase I of PG&E's 2014 General Rate Case, the CPUC adopted PG&E's proposed rate design for, and authorized PG&E to implement, an optional program whereby customers other than CCSF that take service pursuant to Schedule LS-1 (PG&E Owned Street and Highway Lighting) can request the replacement of existing non-decorative High Pressure Sodium (HPS) streetlights with LED streetlights. Under PG&E's LED Program, customers elect to pay a monthly LED Program Incremental Facility Charge in lieu of paying the estimated full cost of LED replacement in advance of the work. The approved program offers customers an economic approach to converting these lights to LED because the cost savings associated with the reduced cost of energy is larger than the Incremental Facility Charge. Further, in Advice 4661-E, Revision of Electric Schedule LS-1 in compliance with the Statute dated July 1, 2015, PG&E requested approval of an Incremental Facility Charge for customers wishing to convert decorative streetlights served under Schedule LS-1, which were not previously included in the LED Program. As a result of these two initiatives, PG&E has addressed compliance with the Statute for customers served under Schedule LS-1.

In this advice letter PG&E proposes to expand its LED conversion program to include utility owned streetlights that are supplied with energy by CCSF, subject to the same terms and special conditions that apply to conversions of streetlights served under Schedule LS-1.¹ Accordingly, PG&E proposes to apply the same Incremental Facility Charge to LED conversion of CCSF non-decorative streetlights as is currently available for non-decorative LS-1 streetlights (see Schedule LS-1, Sheet 2). Further, if approved by Advice 4661-E, PG&E proposes to apply the same Incremental Facility Charge approved for decorative LS-1 streetlights to LED conversions of CCSF decorative streetlights.

¹ For example, consistent with the special conditions of Schedule LS-1, only luminaires selected by PG&E are eligible for installation under this program.

Like its LED conversion programs for Schedule LS-1, PG&E plans to review the CCSF Incremental Facility Charges (both decorative and non-decorative) during Phase II of future General Rate Cases based on actual cost and participation to determine the appropriate level of each charge and whether they should be continued or converted to a standard rate.

PG&E will account for cost and revenue associated with the CCSF LED conversion program in the same manner as other CCSF streetlight programs.

Public Purpose Program Funds are not collected from CCSF for street light service, so CCSF light replacements will not be eligible for energy efficiency incentives.

PG&E expects to discuss additional options for CCSF participation in LED conversion programs with CCSF, and will seek approval of the Commission in an Advice Letter for any program changes.

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 21, 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
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 January 1, 2016.

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.12-11-009 and 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/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service Lists A.12-11-009 and 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 E)**

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

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **4662-E**

Tier: **2**

Subject of AL: **LED Lighting Conversion Options for the City and County of San Francisco in Compliance with Public Utilities Code Section 384.5**

Keywords (choose from CPUC listing): Compliance, Street Lights

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

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, 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., 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

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