

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



February 14, 2020

Advice Letter 5713-E

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: Update on Status of Bill Redesign for NEM customers, including notification that PG&E is unable to meet implementation schedule proposed in Advice Letter 5257-E and supplemental Advice Letter 5257-E-A

Dear Mr. Jacobson:

Advice Letter 5713-E is effective as of December 13, 2019.

Sincerely,

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

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

December 13, 2019

Advice 5713-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Update on Status of Bill Redesign for NEM customers, including notification that PG&E is unable to meet implementation schedule proposed in Advice Letter 5257-E and supplemental Advice Letter 5257-E-A.

Purpose

Pacific Gas and Electric Company (PG&E) respectfully submits this Tier 1 Advice Letter to advise the CPUC regarding the likely implementation of Bill Redesign for NEM customers.

Background

In July of 2007, the California Public Utilities Commission (CPUC or Commission) established the process for investor owned utilities (IOUs) to redesign customer bills, including information customers should receive.¹ Ordering Paragraph 10 of D.07-07-047 instructed PG&E to file an advice letter for approval of all changes to its bills beyond the cosmetic or superficial. Consequently, to improve the NEM customer experience through improved billing information, presentation and messaging, PG&E voluntarily filed Advice Letter 5257-E on March 26, 2018. A supplemental Advice Letter 5257-E-A was filed on July 26, 2018 and both were approved by the Energy Division on July 31, 2018 and made effective April 25, 2018.

In the approved Advice Letter, PG&E indicated that implementation of the proposed bill redesign would take place by the end of 2019, subject to IT priorities.² Elsewhere in the AL, PG&E explained that a likely completion date would be December 2019.³ As discussed with the Energy Division in June 2019, PG&E is unable to meet this target date. This Advice Letter serves to update the expected timeline for completion of Bill Redesign for NEM customers.

¹ Decision (D.) 07-07-047, issued July 26, 2007.

² AL 5257-E, page 26 Section 11.

³ AL 5257-E, page 15 Section 8.

Why was implementation of AL 5257-E and AL 5257-E-A delayed?

In the 16 months since AL 5257-E and AL 5257-E-A were approved, several Commission rate design proceeding decisions resulted in an unprecedented volume of changes required in PG&E's billing system. This work has been ordered by the Commission. The volume of required rate change work is more than double the volume of rate change projects from the previous three years. There is a limit to the volume of changes that can be executed concurrently in the billing system. PG&E has worked diligently to prioritize projects, defer projects where necessary and use manual approaches when feasible. This has resulted in the delay of the NEM Bill Redesign work in the billing system. As discussed in April 2019, these billing system changes include:

- Residential Rate Changes through 2020
 - EV TOU Periods (EV-2A)
 - Electric Season Change
 - Gas Season Change
 - Default TOU Transition
 - New E-TOU with 5-8 PM peak period
 - Close E-TOU-A, E-TOU-B
 - Transition E-TOU-A customers to E-TOU-C
 - Eliminate Bill Protection for Start/Transfer customers
 - Disadvantaged Communities Green Tariff, Transitional Community Solar Discount and Disadvantaged Communities San Joaquin Valley Pilot Bill Protection

- NonResidential Rate Changes through 2020
 - New TOU Period Transition
 - Opt-in/Mandatory Commercial
 - Opt-in Ag/Mandatory
 - Close Legacy Commercial Rates
 - Close Legacy Ag rates
 - B19/B20 Large Commercial Storage Rates
 - B1-STORE Small Business Storage Rate
 - RESBCT A-6
 - Food Bank Discount (Manual in 2020, automated in 2021)
 - Commercial EV Rate

In addition, since the June 2019 discussion with the Energy Division, electric utilities in California have had to address severe impacts of climate change that stressed utility resources. These include implementation of Public Safety Power Shutoff (PSPS) events requiring significant IT resources.

The earliest this bill redesign work could begin would be 2021, where it would compete for IT resources. While the 12-18 month estimate of time to implement the proposed

NEM bill redesign⁴ is still accurate, PG&E considers 2023 a more realistic time to expect completion of the significant bill redesign for NEM customers approved in AL 5257-E and AL 5257-E-A. PG&E notes that it may prove most cost-effective to also incorporate – at that time – additional bill redesign elements to help customers make the transition to any NEM successor tariffs resulting from the NEM reform OIR expected to begin in 2020, assuming a final decision in the OIR has been issued. PG&E may consider standardizing changes across the various iterations of NEM (NEM, NEM2 and any future NEM Reform). In addition, it will be easier for customers if the NEM bill is only altered once. If that proves to be the case, PG&E would expect to file a subsequent Tier 2 Advice Letter that includes all the proposed redesign elements, including those described in AL 5257-E and AL 5257-E-A.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than January 2, 2020 which is 20 days after the date of this submittal. 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 B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

⁴ Ibid., p.26.

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 submittal become effective upon date of submittal, which is December 13, 2019.

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 of R. 12-11-005 and R.14-07-002. 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 submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List for R.12-11-005
Service List for R.14-07-002



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5713-E

Tier Designation: 1

Subject of AL: Update on Status of Bill Redesign for NEM customers, including notification that PG&E is unable to meet implementation schedule proposed in Advice Letter 5257-E and supplemental Advice Letter 5257-E-A.

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.07-07-047

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:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 12/13/19

No. of tariff sheets: 0

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 proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole	Evaluation + Strategy for Social Innovation	Regulatory & Cogeneration Service, Inc.
	GenOn Energy, Inc.	SCD Energy Solutions
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz & Ritchie	
BART	Green Charge Networks	SCE
	Green Power Institute	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Hanna & Morton	
P.C. CalCom Solar	ICF	SPURR
California Cotton Ginners & Growers Assn	International Power Technology	San Francisco Water Power and Sewer
California Energy Commission	Intestate Gas Services, Inc.	Seattle City Light
California Public Utilities Commission	Kelly Group	Sempra Utilities
California State Association of Counties	Ken Bohn Consulting	Southern California Edison Company
Calpine	Keyes & Fox LLP	Southern California Gas Company
	Leviton Manufacturing Co., Inc. Linde	Spark Energy
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
Casner, Steve	Los Angeles Dept of Water & Power	Sunshine Design
Cenergy Power	MRW & Associates	Tecogen, Inc.
Center for Biological Diversity	Manatt Phelps Phillips	TerraVerde Renewable Partners
	Marin Energy Authority	Tiger Natural Gas, Inc.
Chevron Pipeline and Power City of Palo Alto	McKenzie & Associates	
	Modesto Irrigation District	TransCanada
City of San Jose	Morgan Stanley	Troutman Sanders LLP
Clean Power Research	NLine Energy, Inc.	Utility Cost Management
Coast Economic Consulting	NRG Solar	Utility Power Solutions
Commercial Energy		Utility Specialists
County of Tehama - Department of Public Works	Office of Ratepayer Advocates	
Crossborder Energy	OnGrid Solar	Verizon
Crown Road Energy, LLC	Pacific Gas and Electric Company	Water and Energy Consulting Wellhead Electric Company
Davis Wright Tremaine LLP	Peninsula Clean Energy	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy		Yep Energy
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		