

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



March 31, 2020

Advice Letter 5771-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: Electric Rule Number 15 and 16 update per Administrative Law Judge's Ruling in R.18-12-006 Extending Interim Policy on Common Facility Costs

Dear Mr. Jacobson:

Advice Letter 5771-E is effective as of February 27, 2020

Sincerely,

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

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

February 27, 2019

Advice 5771-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Electric Rule Number 15 and 16 update per Administrative Law Judge's Ruling in R.18-12-006 Extending Interim Policy on Common Facility Costs

Purpose

This advice letter requests approval of changes to Pacific Gas and Electric Company's (PG&E's) Electric Rule 15 and 16 in compliance with the Administrative Law Judge's (ALJ's) Ruling extending the interim policy on treating Plug-in Electric Vehicle (PEV) charging costs as common facility costs related to Rules 15 and 16. The ALJ Ruling is part of the Order Instituting Rulemaking (R.18-12-006) to continue the Development of Rates and Infrastructure for Vehicle Electrification (DRIVE).

Background

In Decision (D.) 11-07-029 the Commission adopted the interim policy of treating PEV charging costs that exceed the allowances in Electric Rules 15 and 16 of the three large electric utilities as common facility costs. Such treatment shifts the costs which exceed allowances to all residential ratepayers, instead of the single customer who triggered the upgrade costs.

The Commission extended the interim tariff policy, known as the Common Treatment for Excess PEV Charging Costs, in D.13-06-014 and then again in D.16-06-011 to June 30, 2019.¹ In December 2018 the Commission initiated the DRIVE rulemaking, which will consider cost recovery mechanisms for transportation electrification investments, and once again extended the interim policy to December 31, 2019.² The DRIVE rulemaking is still underway and there is no finality on the Common Treatment for Excess PEV Charging Costs policy. In light of this, the ALJ Ruling as part of Rulemaking 18-12-006, has modified the Commission's prior decisions to direct PG&E and the other large Investor Owned Utilities (IOUs) to continue the interim tariff policy until December 31,

¹ See D.16-06-011 at page 4.

² See DRIVE Scoping Ruling at page 18.

2020.³ Because the Commission has not issued a decision modifying its prior decisions or ratifying the ALJ Ruling, PG&E is requesting Commission approval of the modifications to Electric Rules 15 and 16 by this advice submittal.

Tariff Revisions

The revised versions of Electric Rules 15 and 16 are provided as Attachment 1. For your convenience, redline versions of the tariff revisions are included as Attachment 2.

PG&E will continue implementing the interim tariff policy on common facility costs related to Rules 15 and 16 until December 31, 2020 or until otherwise directed by the Commission.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 18, 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

³ ALJ Ruling, issued December 13, 2019, Ordering Paragraph 1.

Facsimile: (415) 973-3582
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 submittal become effective upon date of submittal, which is February 27, 2020.

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.18-12-006. 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

Attachments

cc: Service lists for R.18-12-006
Carolyn Sisto, Energy Division
Audrey Neuman, Energy Division



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 U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 5771-E

Tier Designation: 1

Subject of AL: Electric Rule Number 15 and 16 update per Administrative Law Judge's Ruling in R.18-12-006 Extending Interim Policy on Common Facility Costs

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 #: 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:

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: 2/27/20

No. of tariff sheets: 4

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: Electric Rule 14, Electric Rule 15

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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
46287-E	ELECTRIC RULE NO. 15 DISTRIBUTION LINE EXTENSIONS Sheet 5	41103-E
46288-E	ELECTRIC RULE NO. 16 SERVICE EXTENSIONS Sheet 16	15607-E
46289-E	ELECTRIC TABLE OF CONTENTS Sheet 1	46218-E
46290-E	ELECTRIC TABLE OF CONTENTS Sheet 19	44208-E



ELECTRIC RULE NO. 15
DISTRIBUTION LINE EXTENSIONS

Sheet 5

C. DISTRIBUTION LINE EXTENSION ALLOWANCES (Cont'd.)

- 3. RESIDENTIAL ALLOWANCES. The allowance for Distribution Line Extensions, Service Extensions, or a combination thereof, for Permanent Residential Service is \$2,154 per meter or residential dwelling unit.
- 4. NON-RESIDENTIAL ALLOWANCES. The allowance for Distribution Line Extensions, Service Extensions, or a combination thereof, for Permanent Non-Residential Service is determined by PG&E using the formula in Section C.2.

Where the Distribution Line Extension will serve a combination of residential and non-residential meters, residential allowances will be added to non-residential allowances.

- 5. SEASONAL, INTERMITTENT, EMERGENCY, AND INSIGNIFICANT LOADS. When an Applicant requests service that requires a Distribution Line Extension to serve loads that are seasonal or intermittent, the allowance for such loads shall be determined using the formula in Section C.2. No allowance will be provided where service is used only for emergency purposes, or for Insignificant Loads.
- 6. INTERIM POLICY ON EXCESS PEV CHARGING COSTS. Any costs for a Distribution Line Extension for plug-in electric vehicle charging that are in excess of the allowance for Distribution Line Extensions shall be treated as common facility costs and paid for by PG&E until December 31, 2020.¹

(N)
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(N)

D. CONTRIBUTIONS OR ADVANCES BY APPLICANT

- 1. GENERAL. Contributions or Advances by an Applicant to PG&E for the installation of a Distribution Line Extension to receive PG&E service consists of such things as cash payments, the value of facilities deeded to PG&E, and the value of Excavation performed by Applicant.
- 2. PROJECT-SPECIFIC COST ESTIMATES. PG&E's total estimated installed cost will be based on a project-specific estimated cost.
- 3. CASH ADVANCE. A cash Advance will be required only if Applicant's excess allowance is less than PG&E's total estimated installed cost to complete a Distribution Line Extension.

¹ The interim policy of Common Treatment for Excess PEV Charging Costs was set forth in Commission Decision (D.)11-07-029, and extended in D.13-06-014, D.16-06-011, Rulemaking (R.) 18-12-006 Scoping Memo and Ruling, and most recently the Administrative Law Judge's Ruling Extending Interim Policy on Common Facility Costs Related to Electric Rules 15 and 16 issued in R.18-12-006 on December 13, 2019.

(N)
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(N)

(Continued)



**ELECTRIC RULE NO. 16
SERVICE EXTENSIONS**

Sheet 16

E. ALLOWANCES AND PAYMENTS BY APPLICANT (Cont'd.)

4. PAYMENTS (Cont'd.)

c. **TAX.** Any payments or contribution of facilities by Applicant are taxable Contributions in Aid of Construction (CIAC) and shall include an Income Tax Component of Contribution (ITCC) for state and federal tax at the rate provided in PG&E's Preliminary Statement.

d. **OTHER.** PG&E's total estimated installed cost for any work it performs that is Applicant's responsibility or performs for the convenience of Applicant.

5. **REFUNDS.** No refunds apply to the installation of Residential Service Facilities under this Rule.

6. **INTERIM POLICY ON EXCESS PEV CHARGING COSTS.** Any costs for a Distribution Line Extension, Service Extension, or any combination thereof, for plug-in electric vehicle charging that are in excess of the allowance shall be treated as common facility costs and paid for by PG&E until December 31, 2020.¹

(N)
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(N)

F. EXISTING SERVICE FACILITIES

1. SERVICE REINFORCEMENT

a. **PG&E-OWNED.** When PG&E determines that its existing Service Facilities require replacement, the existing Service Facilities shall be replaced as a new Service Extension under the provisions of this rule.

b. **APPLICANT-OWNED.** When PG&E determines that existing Applicant-owned service facilities (installed under a prior rule) require replacement, such replacement or reinforcement shall be accomplished under the provisions for a new Service Extension installation, except that if PG&E determines that any portion of Applicant's existing service conductors can be utilized by PG&E, Applicant will convey any such usable part to PG&E and an appropriate credit by PG&E may be allowed to Applicant.

Applicant will replace or reinforce that portion of the Service Extension which Applicant will continue to own, under the provisions of this rule for new services.

¹ The interim policy of Common Treatment for Excess PEV Charging Costs was set forth in Commission Decision (D.)11-07-029, and extended in D.13-06-014, D.16-06-011, Rulemaking (R.) 18-12-006 Scoping Memo and Ruling, and most recently the Administrative Law Judge's Ruling Extending Interim Policy on Common Facility Costs Related to Electric Rules 15 and 16 issued in R.18-12-006 on December 13, 2019.

(N)
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(N)

(Continued)



ELECTRIC TABLE OF CONTENTS

Sheet 1

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Rules.....	45270,46290,46109-E		(T)
Maps, Contracts and Deviations.....	37960-E		
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Advice 5771-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted February 27, 2020
Effective February 27, 2020
Resolution



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Rule 13	Temporary Service.....	43014-E
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Rule 17	Meter Tests and Adjustment of Bills for Meter Error.....	20099,29723,29955,25149-E
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(Continued)

Advice 5771-E
February 27, 2020

Attachment 2

Redline Tariffs

ELECTRIC RULE NO. 15
DISTRIBUTION LINE EXTENSIONS

Sheet 5

C. DISTRIBUTION LINE EXTENSION ALLOWANCES (Cont'd.)

3. RESIDENTIAL ALLOWANCES. The allowance for Distribution Line Extensions, Service Extensions, or a combination thereof, for Permanent Residential Service is \$2,154 per meter or residential dwelling unit. (R)

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Where the Distribution Line Extension will serve a combination of residential and non-residential meters, residential allowances will be added to non-residential allowances.

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6. INTERIM POLICY ON EXCESS PEV CHARGING COSTS. Any costs for a Distribution Line Extension for plug-in electric vehicle charging that are in excess of the allowance for Distribution Line Extensions shall be treated as common facility costs and paid for by PG&E until December 31, 2020.¹

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3. CASH ADVANCE. A cash Advance will be required only if Applicant's excess allowance is less than PG&E's total estimated installed cost to complete a Distribution Line Extension.

¹ The interim policy of Common Treatment for Excess PEV Charing Costs was set forth in Commission Decision (D.)11-07-029, and extended in D.13-06-014, D.16-06-011, Rulemaking (R.) 18-12-006 Scoping Memo and Ruling, and most recently the Administrative Law Judge's Ruling Extending Interim Policy on Common Facility Costs Related to Electric Rules 15 and 16 issued in R.18-12-006 on December 13, 2019. (Continued)

ELECTRIC RULE NO. 16
SERVICE EXTENSIONS

Sheet 16

E. ALLOWANCES AND PAYMENTS BY APPLICANT (Cont'd.)

4. PAYMENTS (Cont'd.) (T)

c. TAX. Any payments or contribution of facilities by Applicant are taxable Contributions in Aid of Construction (CIAC) and shall include an Income Tax Component of Contribution (ITCC) for state and federal tax at the rate provided in PG&E's Preliminary Statement.

d. OTHER. PG&E's total estimated installed cost for any work it performs that is Applicant's responsibility or performs for the convenience of Applicant.

5. REFUNDS. No refunds apply to the installation of Residential Service Facilities under this Rule. (N)
(N)

6. INTERIM POLICY ON EXCESS PEV CHARGING COSTS. Any costs for a Distribution Line Extension, Service Extension, or any combination thereof, for plug-in electric vehicle charging that are in excess of the allowance shall be treated as common facility costs and paid for by PG&E until December 31, 2020.¹

(T)
(T)

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b. APPLICANT-OWNED. When PG&E determines that existing Applicant-owned service facilities (installed under a prior rule) require replacement, such replacement or reinforcement shall be accomplished under the provisions for a new Service Extension installation, except that if PG&E determines that any portion of Applicant's existing service conductors can be utilized by PG&E, Applicant will convey any such usable part to PG&E and an appropriate credit by PG&E may be allowed to Applicant. (T)

Applicant will replace or reinforce that portion of the Service Extension which Applicant will continue to own, under the provisions of this rule for new services.

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**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	IGS Energy	San Francisco Water Power and Sewer
California Energy Commission	International Power Technology	Seattle City Light
California Public Utilities Commission	Intestate Gas Services, Inc.	Sempra Utilities
California State Association of Counties	Kelly Group	Southern California Edison Company
Calpine	Ken Bohn Consulting	Southern California Gas Company
	Keyes & Fox LLP	Spark Energy
Cameron-Daniel, P.C.	Leviton Manufacturing Co., Inc. Linde	Sun Light & Power
Casner, Steve	Los Angeles County Integrated	Sunshine Design
Cenergy Power	Waste Management Task Force	Tecogen, Inc.
Center for Biological Diversity	Los Angeles Dept of Water & Power	TerraVerde Renewable Partners
	MRW & Associates	Tiger Natural Gas, Inc.
Chevron Pipeline and Power	Manatt Phelps Phillips	
City of Palo Alto	Marin Energy Authority	TransCanada
	McKenzie & Associates	Troutman Sanders LLP
City of San Jose	Modesto Irrigation District	Utility Cost Management
Clean Power Research	Morgan Stanley	Utility Power Solutions
Coast Economic Consulting	NLine Energy, Inc.	Utility Specialists
Commercial Energy	NRG Solar	
County of Tehama - Department of Public Works	Office of Ratepayer Advocates	Verizon
Crossborder Energy	OnGrid Solar	Water and Energy Consulting Wellhead Electric Company
Crown Road Energy, LLC	Pacific Gas and Electric Company	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP	Peninsula Clean Energy	Yep Energy
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		