

October 14, 2020

**Advice 5975-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: PG&E's Modifications to Rule 18 per D.20-09-025**

**Purpose**

Pursuant to Decision (D.) 20-09-025, Pacific Gas and Electric Company (PG&E) is providing modifications to its Electric Rule 18.

**Background**

On September 24, 2020, the Commission approved D.20-09-025, Decision Clarifying Status of Electric Vehicle Charging Service Providers as Public Utilities in Rulemaking (R.) 18-12-006. Per Ordering Paragraphs (OP) 3 and 4, PG&E is submitting a Tier 1 advice letter making changes to its version of Electric Rule 18 necessary to conform to the holdings of the Decision.

**Proposed Tariff Revisions**

This advice letter proposes to make the following revisions (in red) to the definition of Electric Vehicle in PG&E's Electric Rule 18 Part (C)(6):

**6. ELECTRIC VEHICLES**

As provided by Public Utilities Code Section 216(i), a customer who owns, controls, operates or manages a facility that supplies electricity to the public only for use to charge light duty plug-in electric vehicles is not a public utility and therefore may resell electricity without regard to this Rule. **As provided by California Public Utilities Commission Decision No. 20-09-025, a customer who owns, controls, operates or manages a facility that supplies electricity to the public only for use to charge medium duty, heavy duty, or off-road plug-in electric vehicles or off-road electrical equipment is not a public utility and therefore may resell electricity without regard to this Rule.** Such resale of electricity for electric vehicle charging does not affect the Commission's authority **to regulate electric vehicle charging service providers** under **Decision No. 10-07-044** and Public Utilities Code Sections 454, 740.2, **740.3, 740.12** or any other applicable statute.

**Protests**

**\*\*\*Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com\*\*\***

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than November 3, 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, 4<sup>th</sup> 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

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 October 14, 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:**

Attachment 1: Tariffs  
Attachment 2: Redline Tariff Revisions

cc: Service lists for R.18-12-006



# 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) #: 5975-E

Tier Designation: 1

Subject of AL: PG&E's Modifications to Rule 18 per D.20-09-025

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.20-09-025

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: 10/14/20

No. of tariff sheets: 3

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: See Attachment 1

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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](mailto:PGETariffs@pge.com)

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

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
47667-E	ELECTRIC RULE NO. 18 SUPPLY TO SEPARATE PREMISES AND SUBMETERING OF ELECTRIC ENERGY Sheet 5	34380-E
47668-E	ELECTRIC TABLE OF CONTENTS Sheet 1	47646-E
47669-E	ELECTRIC TABLE OF CONTENTS Sheet 19	47629-E







**ELECTRIC TABLE OF CONTENTS**

Sheet 19

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
<b>Rules (Cont'd)</b>		
Rule 11	Discontinuance and Restoration of Service.....	46810,47627,46812,46813, ..... 46814,46815,13146,13147,13148,13149,13150,35241,46816,42111,42112-E
Rule 12	Rates and Optional Rates .....	16872,27804,43013-E
Rule 13	Temporary Service.....	43014-E
Rule 14	Shortage of Supply and Interruption of Delivery.....	19762,15527, ..... 35394,35395,35396,35397,35398-E
Rule 15	Distribution Line Extensions.....	20093,20094,15577,27072,46287,17851, ..... 30664,27074,15583,20095,21553, 21554-21555,15588,17856,30665,15591,27076,15593-E
Rule 16	Service Extensions.....	20096,15595,31439,14881,15596,15597,15598,16987,15600, ..... 15601,15602,15603,15604,15605,15606,46288, 15608,14254,13775,15609-15610-E
Rule 17	Meter Tests and Adjustment of Bills for Meter Error.....	20099,29723,29955,25149-E
Rule 17.1	Adjustment of Bills for Billing Error .....	33679,29724-E
Rule 17.2	Adjustment of Bills for Unauthorized Use .....	22707,12056,12057,12058-E
Rule 18	Supply to Separate Premises and Submetering of Electric Energy .....	14329*,27037,29056,28910, <b>47667-E</b> (T)
Rule 19	Medical Baseline Quantities .....	43302,43303,18976-E
Rule 19.1	California Alternate Rates for Energy for Individual Customers and Submetered Tenants of Master-Metered Customers.....	44202,46636,32656,29291-E
Rule 19.2	California Alternate Rates for Energy for Nonprofit Group-Living Facilities .....	35305, ..... 36620,46637,33847,32659,43016-E
Rule 19.3	California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities.....	35307,46638,33849,43017-E
Rule 20	Replacement of Overhead with Underground Electric Facilities.....	30474,11240, ..... 11241,19013,16665,15611,19014-E

(Continued)

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**Attachment 2**  
**Redline Tariff Revisions**



**ELECTRIC RULE NO. 18** Sheet 5  
SUPPLY TO SEPARATE PREMISES AND SUBMETERING OF ELECTRIC ENERGY

C. FURNISHING AND METERING OF ELECTRICITY (Cont'd.)

6. ELECTRIC VEHICLES

As provided by Public Utilities Code Section 216(i), a customer who owns, controls, operates or manages a facility that supplies electricity to the public only for use to charge light duty plug-in electric vehicles is not a public utility and therefore may resell electricity without regard to this Rule. As provided by California Public Utilities Commission Decision No. 20-09-025, a customer who owns, controls, operates or manages a facility that supplies electricity to the public only for use to charge medium duty, heavy duty, or off-road plug-in electric vehicles or off-road electrical equipment is not a public utility and therefore may resell electricity without regard to this Rule. Such resale of electricity for electric vehicle charging does not affect the Commission's authority to regulate electric vehicle charging service providers under Decision No. 10-07-044 and Public Utilities Code Sections 454, 740.2, 740.3, 740.12 or any other applicable statute.

D. TESTING OF SUBMETERS

As a condition of service for submetering, where electric energy is furnished in accordance with Paragraphs C.1., C.2., C.3, and C.4. above, customers using submeters as a basis for charges for electricity shall submit to PG&E certification by a meter testing laboratory, satisfactory to PG&E, as to the accuracy of the submeters upon initial installation of such submeters, or for existing submeters upon request of PG&E. As a further condition of service for submetering, the customer shall agree that he will be governed by PG&E's Rule 17, Meter Tests and Adjustment of Bills for Meter Error, with the exception that the word "subcustomer" be substituted for "customer" and the words "Utility's customer" be substituted for "Company." As a further condition of service for submetering, the customer shall agree that PG&E may inspect and examine customer's billing procedures from time to time to determine that such service is made in accordance with this rule or as otherwise may be authorized by the Commission.

E. In the event such energy is furnished or resold otherwise than as provided for above, PG&E may either discontinue service to the customer or, where feasible, furnish electric energy directly to the subcustomer in accordance with PG&E's tariff on file with the Commission.

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

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
California Cotton Ginners & Growers Assn  
California Energy Commission  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Cenergy Power  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

Downey & Brand  
East Bay Community Energy  
Ellison Schneider & Harris LLP  
Energy Management Service  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie  
Green Power Institute  
Hanna & Morton  
ICF  
IGS Energy  
International Power Technology  
Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

Office of Ratepayer Advocates  
OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy