

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6248E
As of July 12, 2021

Subject: Modification of Electric Rate Schedule A-15 to a Four Month Summer Season in Compliance with Decision 18-08-013

Division Assigned: Energy

Date Filed: 07-07-2021

Date to Calendar: 07-09-2021

Authorizing Documents: D1808013

Disposition:	Accepted
Effective Date:	08-01-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

July 7, 2021

Advice 6248-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Modification of Electric Rate Schedule A-15 to a Four Month Summer Season in Compliance with Decision 18-08-013

Purpose

Pacific Gas and Electric Company (PG&E) submits this advice letter to provide proforma tariffs and illustrative rates to reflect the modification of electric rate Schedule A-15 to a four month summer season in compliance with PG&E's 2017 General Rate Case (GRC) Phase II final Decision (D.) 18-08-013. The proforma tariffs are provided as Attachment 1 and redlined proforma tariffs are provided as Attachment 2.

Background

On August 17, 2018, the Commission issued D.18-08-013 in PG&E's 2017 GRC Phase II proceeding. Among several other settlements, the Commission adopted PG&E's "Motion of Pacific Gas and Electric Company for Adoption of the Small Light and Power Rate Design (SLP) Supplemental Settlement Agreement," dated January 29, 2018.

Ordering Paragraph 10 of D.18-08-013 ordered the implementation of the small light and power settlement as soon as practicable following the issuance of a final decision. In addition, Ordering Paragraph 2 stated as follows:

"2. Pacific Gas and Electric Company shall implement the revised summer season as soon as practicable following the issuance of a final California Public Utilities Commission decision in this proceeding."

Further, D.18-08-013 stated as follows at pages 55 to 56:

"PG&E's proposed SLP rate designs concern customers on the following rate schedules: A-1 (and its variants), A-6, A-15,¹⁰⁴ and TC-1.¹⁰⁵ Notably, the settlement states that only A-1 TOU, A-1 STORE, and A-6 will be transitioned to the new TOU periods.¹⁰⁶ The settlement is not clear if seasonal definitions for A-15 customers are affected. To resolve ambiguity,

we presume that A-15 customers will face the new seasonal definitions faced by other commercial customers at the same time as other customer classes.”

“104 Generally, a rate specific to direct current (DC) lighting, heating, and/or power services for certain customers taking service on this schedule since 1971 in some areas of San Francisco and Oakland where DC service is available.

105 Applicable to metered service for traffic control-related equipment operating on a 24-hour basis, owned by governmental agencies and located on streets, highways and other publicly-dedicated outdoor ways and places.

106 SLP Settlement at 7.”

Although the small light and power settlement in fact did not specify that Schedule A-15 should be modified to a four month summer season, PG&E interprets the final sentence above from page 56, in conjunction with Ordering Paragraph 2, to constitute an order to modify Schedule A-15 to a four month summer season as soon as practicable, and plans to implement it accordingly, effective October 1, 2021.

While PG&E implemented the new four month summer season for the majority of the new non-residential commercial, industrial, and agricultural rate schedules with later Time-of-Use (TOU) hours on the timelines agreed to in the various settlements, Schedule A-15 is a non-TOU rate. Therefore, the Schedule A-15 change to a four month summer season was delayed until billing system implementation could be coordinated.

PG&E will implement the change for Schedule A-15 from the legacy six-month summer season, to the new four-month summer season, on October 1, 2021.¹ This will coincide with the starting date of the new winter season, and will provide the lower winter rates to Schedule A-15 customers one month sooner than under the prior legacy winter season that would have begun on November 1, 2021. PG&E will start communicating with customers about this change beginning on September 1, 2021, one month before the change, as well as through the end of November 2021.

Schedule A-15 Rate Design

The legacy version of Schedule A-15 used the exact same seasonal summer and winter flat non-TOU energy charge rates per kWh that apply to the non-TOU version of legacy

¹ The summer season will span from June 1 through September 30 and the winter season will span from October 1 through May 31. The Schedule A-15 change proposed here may alternately be stated as implementing the new eight-month winter season effective October 1, 2021.

Schedule A-1, based on a six month summer season. However, there is no flat non-TOU version or rate schedule for the new series of commercial rates with a four month summer, including the new Schedule B-1, which is the successor to legacy Schedule A-1.

Accordingly, to construct the new four month summer season version of Schedule A-15, PG&E has designed flat non-TOU seasonal average summer and winter energy charges per kWh for the modified four month summer season version of Schedule A-15, based on an overall flat seasonal average rate or revenue neutral sales weighted version of the seasonal TOU energy charge per kWh rates on new Schedule B-1.

More specifically, this calculation must be conducted separately for sub-functionalized component generation versus distribution TOU energy charges per kWh on TOU Schedule B-1. This approach requires calculation of the flat average rate per kWh by season, which may be expressed as the seasonal energy charge revenue amount, divided by total applicable seasonal kWh sales. In the alternate, this may be specified more technically as the sales weighted average of the Schedule B-1 summer on-peak, part-peak, and off-peak prices, along with the sales weighted average of the Schedule B-1 winter on-peak, off-peak, and super off-peak TOU periods and prices. Either of these two mathematical approaches will derive the equivalent revenue neutral flat non-TOU seasonal energy charges applicable for Schedule A-15 as modified to a four month summer season.

Table 1 below provides the resulting illustrative rates for the current and proposed modified Schedule A-15 energy charges per kWh by season, based on the methodology noted above, using illustrative rates based on March 1, 2021 rate and revenue requirement levels. PG&E will update the proposed illustrative Schedule A-15 rates for implementation at a later time in a separate Tier 1 advice letter, based on the revenue requirement levels to be reflected in rates effective on October 1, 2021.

TABLE 1

Present versus Proposed Schedule A-15 Energy Charges per kWh (Illustrative March 1, 2021 Rate Levels)

PRESENT LEGACY VERSION OF SCHEDULE A-15 **Rates Effective March 1, 2021**

SIX MONTH SUMMER

Summer: May 1 to October 31

Winter: November 1 to April 30

	<u>Distribution</u>	<u>Generation</u>	<u>Other</u>	<u>TOTAL</u>
Summer Energy Charge per kWh	\$0.10436	\$0.12847	\$0.05182	\$0.28465
Winter Energy Charge per kWh	\$0.08751	\$0.08833	\$0.05182	\$0.22766

PROPOSED NEW VERSION OF SCHEDULE A-15
Illustrative Rates as if Effective March 1, 2021

FOUR MONTH SUMMER

Summer: June 1 to September 30

Winter: October 1 to May 31

	<u>Distribution</u>	<u>Generation</u>	<u>Other</u>	<u>TOTAL</u>
Summer Energy Charge per kWh	\$0.10907	\$0.12282	\$0.05182	\$0.28371
Winter Energy Charge per kWh	\$0.08895	\$0.10250	\$0.05182	\$0.24327

Tariff Revisions

In this advice letter, PG&E is submitting proforma tariff revisions for the text language of Schedule A-15, combined with illustrative rate levels. The tariff text changes are limited to the special condition for "Seasons" at the top of Sheet 3 of the Schedule A-15 tariff.

The Schedule A-15 illustrative March 1, 2021 rate levels herein must be revised as necessary to reflect the final revenue requirement and rate levels in effect on the October 1, 2021 proposed implementation date for the modification of Schedule A-15 from a six-month summer season to a four-month summer season. PG&E will include final Schedule A-15 rates effective October 1, 2021 in a separate Tier 1 advice letter prior to implementation. This future Tier 1 advice letter may consolidate this Schedule A-15 change with other applicable October 1, 2021 electric rate changes.

The proforma tariffs with text changes are provided as Attachment 1 to this advice letter. Redlined tariffs with language changes are provided as Attachment 2 to this advice letter.

Protests

*****Due to the COVID-19 pandemic, 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 July 27, 2021, 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:

Sidney Bob Dietz II
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 respectfully requests that this Tier 2 compliance advice letter become effective August 1, 2021, so that PG&E may have sufficient lead time after approval to complete the work to communicate this upcoming change to affected customers by September 1, 2021, and to fully design and test this structural change to its billing system prior to rate implementation on October 1, 2021.

Upon approval of this advice letter, PG&E will update the tariff revisions and proposed illustrative Schedule A-15 rates for implementation at a later time in a separate Tier 1 advice letter, based on the revenue requirement levels to be reflected in rates effective on October 1, 2021.



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) #: 6248-E

Tier Designation: 2

Subject of AL: Modification of Electric Rate Schedule A-15 to a Four Month Summer Season in Compliance with Decision 18-08-013

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.18-08-013

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: 8/1/21

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 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: Sidney Bob Dietz II, 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:

Advice 6248-E
July 7, 2021

Attachment 1

Proforma Tariffs



ELECTRIC SCHEDULE A-15
DIRECT-CURRENT GENERAL SERVICE

Sheet 3

SEASONS: The summer (Period A) rate is effective June 1 through September 30. The winter (Period B) rate is effective October 1 through May 31. When billing includes use in both Period A and Period B, charges will be prorated based upon the number of days in each period. (T)
(T)

FIXED USAGE ESTIMATES: Customers on Schedule A-15 whose direct current (DC) meter, in PG&E's opinion, is not functioning properly, must have their DC usages estimated for the purposes of billing under this rate schedule. At PG&E's sole discretion, a customer's usage may be estimated by (a) providing that customer with a replacement DC meter, or (b) installing a temporary metering device to establish an average monthly load or (c) calculating usage based on motor sizes, equipment capacity ratings, end-uses, load factor or usage patterns, site inspections or surveys, and records of historical usage. No back-billing for undercharges for non-registering meters would occur.

PG&E will generally seek to establish option (c) as the basis for fixed usage for billing purposes but, where warranted and feasible in PG&E's opinion, may allow the customer to choose option (b). Option (a) is not generally feasible and is cost prohibitive. Customers on Schedule A-15 with DC meters that are not functioning correctly must sign a special agreement under Schedule A-15, Form 79-1141, *Agreement for Schedule A-15 Fixed Usage Estimate*.

(Continued)

Advice 6248-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted Effective Resolution
July 7, 2021

Advice 6248-E
July 7, 2021

Attachment 2

Redlined Tariffs



ELECTRIC SCHEDULE A-15
DIRECT-CURRENT GENERAL SERVICE

Sheet 3

SEASONS: The summer (Period A) rate is effective June 1 through September 30~~May 1 through October 31~~. The winter (Period B) rate is effective October 1 through May 31~~November 1 through April 30~~. When billing includes use in both Period A and Period B, charges will be prorated based upon the number of days in each period.

FIXED USAGE ESTIMATES: Customers on Schedule A-15 whose direct current (DC) meter, in PG&E's opinion, is not functioning properly, must have their DC usages estimated for the purposes of billing under this rate schedule. At PG&E's sole discretion, a customer's usage may be estimated by (a) providing that customer with a replacement DC meter, or (b) installing a temporary metering device to establish an average monthly load or (c) calculating usage based on motor sizes, equipment capacity ratings, end-uses, load factor or usage patterns, site inspections or surveys, and records of historical usage. No back-billing for undercharges for non-registering meters would occur.

PG&E will generally seek to establish option (c) as the basis for fixed usage for billing purposes but, where warranted and feasible in PG&E's opinion, may allow the customer to choose option (b). Option (a) is not generally feasible and is cost prohibitive. Customers on Schedule A-15 with DC meters that are not functioning correctly must sign a special agreement under Schedule A-15, Form 79-1141, *Agreement for Schedule A-15 Fixed Usage Estimate*.

(Continued)

Advice 4014-E
Decision 11-12-053, 11-05-047

Issued by
Brian K. Cherry
Vice President
Regulation and Rates

Date Filed March 16, 2012
Effective May 1, 2012
Resolution _____

**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 Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
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

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