

PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE



August 5, 2022

**Advice Letters 6344-E, 6344-E-A, and 6344-E-B**

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

**SUBJECT:**

Energy Division Rejection of Advice Letters 6344-E, 6344-E-A, and 6344-E-B: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.

Dear Mr. Dietz,

The Commission is in receipt of Tier 3 Advice Letters (AL) 6344-E, 6344-E-A, and 6344-E-B, which pertain to proposed retail tariff changes needed to accommodate transfer of certain unmetered street load assets owned by the City and County of San Francisco (CCSF) from wholesale to retail service. As explained in detail below, pursuant to Section 7.6.1 of CPUC General Order (GO) 96-B, this Disposition Letter informs PG&E of Energy Division's rejection of AL 6344-E and the two supplemental ALs. Energy Division rejects these ALs due to the fact that the requested changes are dependent solely on the eventual outcome of litigation at the Federal Energy Regulatory Commission (FERC), and therefore, because there is no current basis for the proposed tariff changes, the filing of this Advice Letter is clearly erroneous. We also note that a recent agreement between PG&E and CCSF obviates the need for any of the proposed tariff changes.

**BACKGROUND**

PG&E filed AL 6344-E on September 30, 2021, its first supplemental AL 6344-E-A on April 18, 2022, and its second supplemental AL 6344-E-B on May 9, 2022. Advice Letter 6344-E-B stated that "[t]his second supplemental advice letter replaces the original Advice Letter 6344-E and Supplemental Advice Letter 6344-E-A in their entirety<sup>1</sup>." Therefore, this Disposition Letter primarily addresses AL 6344-E-B, in which PG&E explained:

This Advice Letter seeks approval of two new tariff rate classes for unique, decorative streetlights in San Francisco and also seeks to expand existing tariff service to include any of the City and County of San Francisco's (CCSF or San Francisco) unmetered

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<sup>1</sup> Advice Letter 6344-E-B Second Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B (AL 6344-E-B) at 1 (May 9, 2022).

delivery points that transition to CPUC service without the need for metering in most circumstances.<sup>2</sup>

With this advice letter PG&E is notifying the Commission that it *intends* to begin offering service to the City and County of San Francisco under the terms and conditions described in the tariff changes included here for decorative streetlights and, as appropriate, for CCSF’s Legacy unmetered delivery points<sup>3</sup>. (emphasis added)

Since before the filing of the AL 6344-E on September 30, 2021, the change of service for these street load assets from wholesale to retail service was a contested issue between PG&E and CCSF at FERC. Despite the status of the issue at FERC, PG&E’s AL 6344-E requested retail tariff changes in time to accommodate changes in service on February 1, 2022, and AL 6344-E-A adjusted that effective date to July 12, 2022. AL 6344-E-B, however, while still requesting the changes to retail tariffs, indicated no intended effective date for the change in service for CCSF’s street load assets. Energy Division first suspended AL 6344-E on November 2, 2021, and continued that suspension on February 22, 2022. The second suspension would expire on Monday, August 29, 2022. The more complete chronology of filings, protests, replies, and suspensions is captured in the following table.

**Advice Letter 6344-E Chronology**

<b>FILING/ISSUANCE</b>	<b>DATE</b>
<b>1. Advice Letter 6344-E: Proposed Amendments to PG&amp;E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.</b>	<b>September 30, 2021</b>
2. Protest of the City and County of San Francisco to Pacific Gas and Electric Company Advice Letter 6344-E Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and Implementation of Proposed Changes Pursuant to Section 9.2.3 of General Order 96-B	October 20, 2021
3. Pacific Gas and Electric Company’s Reply to the Protest from the City and County of San Francisco to Advice Letter 6344-E – Advice Letter Proposing Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.	October 27, 2021
4. Advice Letter 6344-E Initial Suspension Notice	November 2, 2021
5. Supplement to Protest of the City and County of San Francisco to Pacific Gas and Electric Company Advice Letter 6344-E Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and Implementation of Proposed Changes Pursuant to Section 9.2.3 of General Order 96-B	February 10, 2022
6. Pacific Gas and Electric Company’s Reply to the Supplemental Protest from the City and County of San Francisco to Pacific Gas and Electric Company Advice 6344-E – Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and Implementation of Proposed Changes Pursuant to Section 9.2.3 of General Order 96-B.	February 18, 2022
7. Advice Letter 6344-E Further Suspension Notice	February 22, 2022

<sup>2</sup> Advice Letter 6344-E-B at 1.

<sup>3</sup> Advice Letter 6344-E-B at 3.

<b>8. Advice Letter 6344-E-A: Supplemental: Proposed Amendments to PG&amp;E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.</b>	<b>April 18, 2022</b>
9. City and County of San Francisco Request to Allow Protests to Pacific Gas and Electric Company Advice Letter 6344-E-A	April 20, 2022
10. Denial of Request Not to Reopen Protest Period for Advice Letter 6344-E-A – Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.	April 22, 2022
11. Verizon Wireless and AT&T Mobility Protest of Advice Letter 6344-E-A of Pacific Gas and Electric Company (U-39-E)	May 9, 2022
12. CTIA Protest of Pacific Gas and Electric Company (U-39-E) Advice Letter No. 6344-E-A	May 9, 2022
<b>13. Advice Letter 6344-E-B: Second Supplemental: Proposed Amendments to PG&amp;E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.</b>	<b>May 9, 2022</b>
14. Withdrawal of Protest of the City and County of San Francisco to Pacific Gas and Electric Company Advice Letter 6344-E	May 11, 2022
15. Denial of Request Not to Reopen Protest Period for Advice Letter 6344-E-B – Second Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.	May 12, 2022
16. Pacific Gas and Electric Company’s Reply to the Protests from Verizon Wireless, AT&T Mobility and the CTIA to Advice 6344-E-A – (Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B)	May 16, 2022
17. Verizon Wireless and AT&T Mobility Protest of Advice Letter 6344-E-B of Pacific Gas and Electric Company (U-39-E)	May 31, 2022
18. CTIA Protest of Pacific Gas and Electric Company (U-39-E) Advice Letter No. 6344-E-B	May 31, 2022
19. Pacific Gas and Electric Company’s Reply to the Protests from Verizon Wireless, AT&T Mobility and the CTIA to Advice 6344-E-B – (Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B)	June 7, 2022

While the context of the contested matter at FERC was not clear in AL 6344-E-B, a number of other filings in response to AL 6344-E-A and AL 6344-E-B suggested that an agreement had been reached between CCSF and PG&E to postpone any attempt by PG&E to shift the relevant street load assets from wholesale to retail service until FERC issued an order on this contested matter at some point in the future. As a result, there is neither an identifiable need for PG&E to request changes to its CPUC retail tariffs, nor clarity on what changes could be needed, until litigation at FERC settles the matter.

**FILINGS EXPLAINING THE CONTEXT AND SPECULATIVE NATURE OF AL 6344-E-B**

PG&E filed AL 6344-E-B on May 9, 2022, the same day that protests of AL 6344-E-A (*i.e.*, PG&E’s first supplemental AL) were filed<sup>4</sup>. In its response to the AL 6344-E-A Protests on May 16, 2022, PG&E provided further context for the AL 6344-E-B filing. “[T]he relief sought by PG&E’s Advice Letter is narrowly limited to an expansion of existing PG&E Commission-approved tariffs to authorize PG&E to serve CCSF’s existing unmetered delivery points *if they ultimately transition to CPUC service at some point the future.*”<sup>5</sup> (emphasis added)

Further, having protested the original AL 6344-E on October 20, 2021, CCSF formally withdrew its protests of ALs 6344-E and 6344-E-A on May 11, 2022<sup>6</sup>, which was two days after PG&E’s filing of AL 6344-E-B. In its withdrawal, CCSF explained:

...Advice Letter 3644-E-B [sic] does not state that PG&E intends to transition service to San Francisco’s unmetered loads from whole[sale] distribution service under the jurisdiction of the Federal Energy Regulatory Commission (“FERC”) to retail service under the CPUC’s jurisdiction, in February 2022, as Advice Letter 3644-E had stated, or in July 2022, as Advice Letter 3644-E-A had stated.<sup>7</sup>

While neither AL 6344-E-B nor the CCSF Withdrawal were clear on exactly when the relevant street load facilities would possibly be switched from wholesale to retail service, PG&E’s Reply to Protests of AL 6344-E-B provided further clarity on the status of the issue at FERC, the timing of the change from wholesale to retail service, and PG&E’s purported need for changes to its retail tariff:

...PG&E filed Supplemental AL 6344-E-B, which is intended to supersede its prior two versions of its advice letter and respond to concerns expressed in protests. Also relevant is a recent agreement between PG&E and CCSF to *postpone the potential transition of any existing CCSF unmetered delivery points currently served under PG&E’s Federal Energy Regulatory Commission (FERC)-jurisdictional Wholesale Distribution Tariff (WDT) until FERC issues an order resolving the dispute between the parties.*<sup>8</sup> (emphasis added)

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<sup>4</sup> The two protests of AL 6344-E-A were Verizon Wireless and AT&T Mobility Protest of Advice Letter 6344-E-A of Pacific Gas and Electric Company (U-39-E) (May 9, 2022) and CTIA Protest of Pacific Gas and Electric Company (U-39-E) Advice Letter No. 6344-E-A (May 9, 2022). These Protests were filed by telecommunications interests concerned that the shifting of CCSF’s street load from wholesale to retail service would impact telecommunications devices that are mounted on, and receive power from, the street load assets at issue under licensing agreements with CCSF. The merits of these protests, and the same parties’ subsequent protests of AL 6344-E-B, are not addressed in this Disposition Letter, as the basis of the CPUC’s rejection of AL 6344-E-B moots the arguments made in said protests.

<sup>5</sup> Pacific Gas and Electric Company’s Reply to the Protests from Verizon Wireless, AT&T Mobility and the CTIA to Advice 6344-E-A – (Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B) (“Reply to AL 6344-E-A Protests”) at 3. (May 16, 2022)

<sup>6</sup> Withdrawal of Protest of the City and County of San Francisco to Pacific Gas and Electric Company Advice Letter 6344-E (May 11, 2022) (CCSF Withdrawal)

<sup>7</sup> CCSF Withdrawal at 1. Throughout most of its Withdrawal filing, CCSF incorrectly referred to “AL 3644-E.” However, it is understood that the filing is in the context of AL 6344-E and the related supplemental ALs.

<sup>8</sup> Reply to AL 6344-E-A Protests at 1-2.

Finally, as explained in a footnote in the Reply to Protests of AL 6344-E-B, “The hearing of that dispute at FERC, in Docket No. ER20-2878 et. al was recently set for March 2023, and, in the opinion of PG&E, it is unlikely that FERC will issue an order until sometime [in] 2024<sup>9</sup>.”

## ADVICE LETTER DISPOSITION

PG&E has made it clear that the retail tariff changes it is requesting in AL 6344-E-B are based on PG&E’s desired outcome of litigation at FERC, which is not expected to be concluded for at least two years. It is not reasonable for PG&E to request the CPUC to make such tariff changes when such changes are not relevant to existing circumstances.

For any advice letter, according to General Order (GO) 96-B, “...the Industry Division will (1) reject any advice letter where the advice letter or workpapers are clearly erroneous.... and (2) reject without prejudice an advice letter whose disposition would require an evidentiary hearing or otherwise require review in a formal proceeding<sup>10</sup>.” This matter was carved out for litigation and is currently being litigated at FERC in consolidated FERC Docket Nos. ER22-619, ER22-620, and ER20-2878. Pursuant to GO 96-B, AL 6344-E-B is rejected, as the AL is based on no actual current need and is therefore “clearly erroneous.” While the outcome of a formal proceeding at FERC is needed to determine if and when any future retail tariff changes may be needed related to this matter, the language in GO 96-B appears to contemplate CPUC proceedings. In this situation, the rationale behind the General Order requiring rejection of an AL whose disposition would require a CPUC evidentiary hearing or formal proceeding counsels in favor of rejecting the AL without prejudice, so that PG&E can refile the AL if, and when, the outcome at FERC is more certain.

Sincerely,



Leuwam Tesfai  
Deputy Executive Director for Energy and Climate Policy, CPUC

cc:

Robert Osborn, CPUC Communications Division Director

William K. Sanders, San Francisco Deputy City Attorney

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<sup>9</sup> Pacific Gas and Electric Company’s Reply to the Protests from Verizon Wireless, AT&T Mobility and the CTIA to Advice 6344-E-B – (Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B) footnote 1 at 2. (June 7, 2022)

<sup>10</sup> CPUC General Order 96-B, Section 7.6.1.



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April 18, 2022

**Advice 6344-E-A**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby submits this supplemental submittal to clarify the intent of its original Advice Letter 6344-E and to update the California Public Utilities Commission (Commission or CPUC) on the anticipated transition of certain unmetered delivery points to Commission-jurisdictional service. By means of Advice Letter 6344-E, PG&E intends to amend and expand eligibility associated with its existing applicable rate schedules to allow it to serve additional types of existing unmetered delivery points upon Commission approval.

While this supplemental advice letter makes updates to the cover letter and adds tariff revisions to Electric Rate Schedule A-1, the rest of Advice Letter 6344-E remains unchanged.

**Background**

As described in the original Advice Letter 6344-E, on September 15, 2020, PG&E filed at FERC proposed revisions to certain non-rate terms and conditions and revisions to rate terms in its third WDT rate case proceeding in Docket No. ER20-2878-000, *et al.* Revisions to the WDT service agreements (SA) with the City and County of San Francisco (CCSF) appear in sub-docket ER20-2878-001. On November 13, 2020, FERC issued an order accepting the revisions to the WDT3 and the WDT3 SAs making them effective on April 15, 2021, subject to refund, and established hearing and settlement judge procedures. (***Pac. Gas & Elec. Co., 173 FERC ¶ 61,140 (2020)***)

Relevant here, under the terms of CCSF's WDT SA No. 275, PG&E has been offering a historical accommodation to CCSF by providing unmetered wholesale service to certain CCSF delivery points meeting specific eligibility criteria. Pursuant to the terms of its WDT, PG&E filed at FERC a Notice of Termination of wholesale service in December 2021, providing CCSF with notice that unmetered delivery points are no longer eligible for

service under the terms of WDT3, and advising that CCSF's unmetered loads will be transitioned to CPUC service. FERC accepted PG&E's filing and suspended it for five months, until July 11, 2022. At that time PG&E expects that the large majority of these delivery points will be transitioned to service under a CPUC jurisdictional tariff ("Transition"). Of CCSF's unmetered delivery points that are no longer eligible for wholesale service, nearly all streetlights in San Francisco can be transitioned to service under existing LS-1 or LS-2 tariffs on July 12, 2022. Pending approval of the Advice Letter, PG&E expects that nearly all of CCSF's remaining unmetered delivery points (including decorative streetlights) will transition from FERC to CPUC tariffs.

Other than for streetlight service, all new delivery points must be metered on a going-forward basis. PG&E clarifies its proposed approach to transition CCSF's legacy unmetered loads to service under CPUC tariffs with an expectation that the bulk of them will continue to be served without metering:

### **1. Unmetered Streetlights**

Effective July 12, 2022, PG&E will transition nearly all of San Francisco's unmetered streetlights to service under the existing LS-1 or LS-2 rate schedules, as appropriate. In accordance with the existing tariffs, no metering will be required for legacy or future streetlight service. Decorative streetlights located in San Francisco will be transitioned upon approval of the Advice Letter.

### **2. Unmetered CCSF Non-Streetlight Delivery Points**

After July 12, 2022, all delivery points described below will be transitioned to CPUC tariffs upon approval of the Advice Letter, unless they have been modified to meet the eligibility requirements for wholesale service under the WDT3. Only these delivery points, previously served at wholesale, will be permitted to rely upon the Advice Letter's proposed modifications to allow them to continue to receive unmetered service going forward.

PG&E and CCSF will confer on the approximately 1,400 locations of existing CCSF unmetered non-streetlight loads (not including Distributed Antenna Systems (DAS) as described in subsection (d) below) to determine whether a meter pedestal exists or, when practical, whether there is physical space to install a meter pedestal. On a best-efforts basis, and with cooperation from CCSF, PG&E plans to identify the circumstances surrounding each of these locations by end of 2022. See Advice Letter 6344-E - Attachment 3, "CCSF Intersection Inventory" for a list of unmetered delivery points as provided by CCSF.

#### **a. Unmetered CCSF Delivery Points with an Existing Meter Pedestal**

For unmetered delivery points where a meter pedestal already exists, PG&E will install a meter pursuant to the applicable rule or rate schedule, such as Electric Rule 16 or rate schedule TC-1, and will convert the service to

metered service. Cost and installation responsibilities shall be in accordance with the applicable rule or rate schedule.

**b. Unmetered CCSF Delivery Points with Physical Space to Accommodate a Meter Pedestal**

For unmetered delivery points where it is practical and there is available space to install a meter pedestal pursuant to the applicable PG&E rule or rate schedule, PG&E expects CCSF to install meter pedestals on a best-efforts basis at each of these locations by no later than 12 months from when 2a is completed. Once the meter pedestal has been installed, PG&E will install meters pursuant to the applicable PG&E rule or rate schedule and convert the service to metered service.

**c. Unmetered CCSF Delivery Points without Physical Space to Accommodate a Meter Pedestal**

For unmetered delivery points where it is impractical to install a meter pedestal and where there is inadequate physical space, PG&E will offer to serve the unmetered delivery point under the applicable CPUC-jurisdictional tariffs using agreed-upon estimated usage in kilowatt-hours provided by CCSF to PG&E on a monthly basis.

**d. Unmetered Distributed Antenna Systems (DAS)**

PG&E will transition all of San Francisco's then-existing unmetered DAS delivery points to Commission-jurisdictional service under its A-1 tariff rate without the need to meter them going forward, subject to subsection (e) below. All new DAS delivery points shall be metered.

**e. Any legacy unmetered CCSF delivery point served under CPUC tariffs where the load is increased, where the delivery point is relocated or where the customer requests or otherwise requires upgrades or relocation of PG&E facilities serving the delivery point**

Except for like-for-like replacements or repairs, these locations will require CCSF to install a meter pedestal or panel and conform to the standard provisions of PG&E's CPUC tariffs for metered loads in order to continue receiving PG&E service. Electric Service for CCSF will be subject to the standard installation responsibilities set forth in PG&E's applicable rules and tariffs. PG&E will serve these loads under the applicable CPUC jurisdictional tariffs using the actual metered data.

### 3. New service requests

Other than for streetlight service, PG&E will not be accepting new applications for unmetered service under its FERC or CPUC tariffs.

#### Tariff Revisions

Revisions are proposed to the Electric Schedule A-1, TC-1 and LS-1 rate schedules to offer expanded service to CCSF's legacy unmetered load previously served wholesale.

Revisions proposed to Electric Schedule LS-1 – *PG&E Owned Streetlight and Highway Lighting* and Electric Schedule TC-1 – *Traffic Control Service* are included in Advice Letter 6344-E and are not changed in this supplemental.

Additional tariff revisions proposed to Electric Schedule A-1 – *Small General Service* are included in this supplemental advice letter. The affected tariff sheets are listed on the enclosed Attachment 1. For convenience of the reader, PG&E has included redline revisions in Attachment 2.

#### Electric Schedule A-1 – Small General Service

- In Applicability Section, add language clarifying that non-streetlight legacy unmetered delivery points with fixed usage are eligible for Schedule A-1 under rate Option A: Non-Time-of-Use Rates. Certain unmetered delivery points with fixed usage (including CCSF's DAS loads) were previously eligible for Schedule A-1 prior to this proposed tariff revision, however the proposed tariff language clarifies the current and future eligibility and treatment of unmetered customers with fixed usage under Schedule A-1.

Pursuant to Section 9.2.3 of G.O. 96-B, PG&E may provide service to a government agency under terms and conditions otherwise deviating from its tariffs then in effect. PG&E may begin such service without prior Commission approval, but the utility shall promptly submit an advice letter to notify the Commission of PG&E's provision of such service and of the rates, charges, terms and conditions under which the service is provided.

With this advice letter PG&E is notifying the Commission that it intends to begin offering service to the City and County of San Francisco under the terms and conditions described in the tariff changes included here on July 12, 2022, for nearly all streetlights in San Francisco and upon approval of the Advice Letter for the remaining legacy unmetered non-streetlight service points. Should the Commission amend our proposal, PG&E will retroactively adjust the Customer's billing to align with the Commission resolution.

**Protests**

Pursuant to GO 96-B, General Rule 7.5.1, PG&E requests to maintain the original protest and comment period designated in Advice 6344-E and not reopen the protest period.

**Effective Date**

Pursuant to G.O. 96-B, Rule 5.3, this advice letter is submitted with a Tier 3 designation. PG&E requests that this Tier 3 advice submittal become effective concurrent with original Advice Letter 6344-E. Advice Letter 6344-E was suspended for a period of up to 180 days, therefore there is no need to extend the effective date. The effective date of Advice Letter 6344-E remains suspended until Commission approval.

**Notice**

In accordance with G.O. 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 the FERC WDT3. Address changes to the G.O. 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/>.

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/S/

Sidney Bob Dietz II  
Director, Regulatory Relations

Attachment 1 – Tariffs  
Attachment 2 – Redline Tariff Revisions

cc: Service List of FERC WDT3



# 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: 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) #: 6344-E-A

Tier Designation: 3

Subject of AL: Supplemental: Proposed Amendments to PG&E LS-1 and TC-1 Rate Schedules and implementation of proposed changes pursuant to Section 9.2.3 of General Order 96-B.

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

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

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:

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Clear Form

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
52894-E	ELECTRIC SCHEDULE A-1 SMALL GENERAL SERVICE Sheet 1	50587-E
52895-E	ELECTRIC TABLE OF CONTENTS Sheet 1	52871-E
52896-E	ELECTRIC TABLE OF CONTENTS Sheet 4	52765-E



**ELECTRIC SCHEDULE A-1  
SMALL GENERAL SERVICE**

Sheet 1

**APPLICABILITY:** Schedule A-1 applies to single-phase and polyphase alternating-current service (for a description of these terms, see Section D of Rule 2\*). This schedule is not available to residential or agricultural service for which a residential or agricultural schedule is applicable, except for single-phase and polyphase service in common areas in a multifamily complex (see Common-Area Accounts section). Customers that are otherwise eligible to take service on Schedule A-1, but are purchasing power to serve electric vehicle charging equipment, are not eligible to take service on this rate schedule.

Effective March 1, 2021, Schedule A-1 is available only to qualifying solar legacy TOU period customers, or to qualifying customers without interval meters that can be read remotely by PG&E, including unmetered customers with fixed usage, as specified in greater detail below. Unmetered customers with fixed usage will be billed under Option A: Non-Time-of-Use Rates. This tariff is currently scheduled to expire in 2027, at which time all customers must transition to new Schedule B-1 or other applicable new tariffs with later TOU hours as described below. The non-TOU version of Schedule A-1 is not available for solar legacy TOU period purposes after March 2021

(T)  
|  
(T)

Effective November 1, 2012, Schedule A-1 is closed to customers with a maximum demand of 75 kW or greater for three consecutive months in the most recent twelve months, or with usage of 150,000 kWh per year or greater, and who have at least twelve (12) months of hourly usage data available. Eligibility for A-1 will be reviewed annually and migration of ineligible customers will be implemented once per year, on bill cycles each November, using the same procedures described below for TOU rates adopted in Decision 10-02-032 as modified by Decision 11-11-008.

Effective November 1, 2014, new customers establishing service on Schedule A-1 where a Smart Meter™ is already in place will be charged Schedule A-1 TOU rates.

Decision 18-08-013 adopted new TOU periods and seasonal definitions for all non-residential customer classes. Schedules A-1, A-6, A-10, E-19 and E-20 will be retained as legacy rate schedules with their legacy TOU periods until the rates with new TOU periods (B-1, B-6, B-10, B-19 and B-20) established in the same proceeding, become mandatory in March 2021. Certain qualifying customers with solar systems will be permitted to maintain their existing legacy TOU periods for a certain period of time, per Decision 17-01-006, as described in the Electric Rule 1, Definitions: Behind-the-Meter Solar Legacy TOU Period Eligibility Requirements.

The new rates with revised TOU periods adopted in D.18-08-013 were available on a voluntary opt-in basis for qualifying customers from November 2019 through February 2021.

\* The Rules referred to in this schedule are part of PG&E's electric tariffs. Copies are available at PG&E's local offices and website at <http://www.pge.com/tariffs>

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Advice 6344-E-A  
Decision

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

April 18, 2022



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April 18, 2022

## **Attachment 2**

### **Redline Tariffs**



**ELECTRIC SCHEDULE A-1  
SMALL GENERAL SERVICE**

Sheet 1

APPLICABILITY: Schedule A-1 applies to single-phase and polyphase alternating-current service (for a description of these terms, see Section D of Rule 2\*). This schedule is not available to residential or agricultural service for which a residential or agricultural schedule is applicable, except for single-phase and polyphase service in common areas in a multifamily complex (see Common-Area Accounts section). Customers that are otherwise eligible to take service on Schedule A-1, but are purchasing power to serve electric vehicle charging equipment, are not eligible to take service on this rate schedule.

Effective March 1, 2021, Schedule A-1 is available only to qualifying solar legacy TOU period customers, or to qualifying customers without interval meters that can be read remotely by PG&E, including unmetered customers with fixed usage, as specified in greater detail below. Unmetered customers with fixed usage will be billed under Option A: Non-Time-of-Use Rates. This tariff is currently scheduled to expire in 2027, at which time all customers must transition to new Schedule B-1 or other applicable new tariffs with later TOU hours as described below. The non-TOU version of Schedule A-1 is not available for solar legacy TOU period purposes after March 2021 (T)  
(T)

Effective November 1, 2012, Schedule A-1 is closed to customers with a maximum demand of 75 kW or greater for three consecutive months in the most recent twelve months, or with usage of 150,000 kWh per year or greater, and who have at least twelve (12) months of hourly usage data available. Eligibility for A-1 will be reviewed annually and migration of ineligible customers will be implemented once per year, on bill cycles each November, using the same procedures described below for TOU rates adopted in Decision 10-02-032 as modified by Decision 11-11-008.

Effective November 1, 2014, new customers establishing service on Schedule A-1 where a Smart Meter™ is already in place will be charged Schedule A-1 TOU rates.

Decision 18-08-013 adopted new TOU periods and seasonal definitions for all non-residential customer classes. Schedules A-1, A-6, A-10, E-19 and E-20 will be retained as legacy rate schedules with their legacy TOU periods until the rates with new TOU periods (B-1, B-6, B-10, B-19 and B-20) established in the same proceeding, become mandatory in March 2021. Certain qualifying customers with solar systems will be permitted to maintain their existing legacy TOU periods for a certain period of time, per Decision 17-01-006, as described in the Electric Rule 1, Definitions: Behind-the-Meter Solar Legacy TOU Period Eligibility Requirements. (T)  
(T)  
(T)

The new rates with revised TOU periods adopted in D.18-08-013 were available on a voluntary opt-in basis for qualifying customers from November 2019 through February 2021.

\* The Rules referred to in this schedule are part of PG&E's electric tariffs. Copies are available at PG&E's local offices and website at <http://www.pge.com/tariffs>

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**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.  
Braun Blasing Smith Wynne, P.C.  
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  
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  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie  
Green Power Institute  
Hanna & Morton  
ICF  
International Power Technology

Intertie

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  
McClintock IP  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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  
Uplight  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy