

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 18, 2019

Advice Letter AL 4143-G

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
San Francisco, CA 94177

Subject: Proposed Revisions to Expand the Applicability of Schedule G-NGV4 Tariff Noncore Natural Gas Service for Compression on Customer's Premises by Customer and Gas Rule 1

Dear Mr. Jacobson:

Advice Letter 4143-G is denied without prejudice.

Attachment 1 contains a review and analysis of the proposed tariff changes and our reasoning for the disposition.

Please contact Kristina Abadjian of Energy Division at (213) 576-1310 (Kristina.Abadjian@cpuc.ca.gov) with any questions.

Sincerely,

 **FOR**

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

Cc: Yvonne Yang, PG&E
Energy Division Tariff Unit
Jean Spencer, Energy Division
Dorothy Duda, Energy Division
Simon Baker, Energy Division
Kristina Abadjian, Energy Division

ATTACHMENT 1

Background

Pacific Gas and Electric Company (PG&E) filed an advice letter on September 17, 2019, to modify PG&E's NGV4 Schedule and its applicability to include the dispensing of Compressed Natural Gas (CNG) and Liquefied Natural Gas (LNG). The advice letter indicated that the proposed revisions would allow customers to compress and liquefy natural gas, then deliver and resell such CNG or LNG to an unaffiliated entity. It further indicated that the revisions would allow interested customers to create significant volumes of CNG or LNG for resale purposes. The advice letter stated that the proposed revisions would help advance California's goals to reduce pollution and greenhouse gas emissions by displacing higher polluting fuels with cleaner burning natural gas.

Moreover, the advice letter proposed to revise PG&E's Gas Rule 1 definition of "Non Core End Use Customer" to add the following: "Customers served under schedule G-NGV4 are PG&E Noncore End-Use Customers even though they may resell their gas to unaffiliated entities."

Responses

Next Energy LLC and Certarus (USA) Ltd, who are noncore customers of PG&E, provided letters of support for PG&E's requested tariff modifications.

Discussion

The proposed tariff modifications were filed as a Tier 2 advice letter. Pursuant to General Order 96-B Rule 5.2, a Tier 2 filing involves a tariff change that is consistent with authority the California Public Utilities Commission (CPUC) has previously granted to the utility submitting the advice letter.¹ PG&E does not assert nor provide information in this advice letter filing that the CPUC has granted PG&E such authority to modify the definition of "Non-Core End Use Customer," regarding LNG/CNG resale. Thus, the proposed tariff changes do not fall within the scope of a Tier 2 advice letter. The utility should consider a different and more appropriate avenue by which it can request modifications to NGV4 Schedule and Gas Rule 1.

Conclusion

Advice letter 4143-G is denied without prejudice.

¹ General Order 96-B Rule 5.2: <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M023/K381/23381302.PDF#page=17>

September 17, 2019

Advice 4143-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Proposed Revisions to Expand the Applicability of Schedule G-NGV4 Tariff Noncore Natural Gas Service for Compression on Customer's Premises by Customer and Gas Rule 1

Purpose

The purpose of this advice letter is to modify Pacific Gas & Electric Company's Gas NGV4 Schedule to clarify that it is applicable to the dispensing of Compressed Natural Gas (CNG) and Liquefied Natural Gas (LNG). These revisions allow PG&E Schedule G-NGV4 customers to compress and liquefy natural gas, deliver and resell the CNG or LNG to an unaffiliated entity, provided it is impractical or uneconomic for PG&E to provide natural gas services to the unaffiliated entity via its transmission and distribution system. These revisions are being proposed principally at the request of customers interested in creating significant volumes of CNG and LNG for the displacement of other higher polluting fuels (primarily diesel and fuel oil).

The proposed revision to Gas Rule 1 clarifies that Customers served under Schedule G-NGV4 are PG&E Noncore End-Use Customers even though they may resell their gas to unaffiliated entities.

In combination, these tariff revisions will help advance California's goals to reduce pollution and GHG emissions by displacing higher polluting fuels with cleaner burning natural gas¹, in situations where:

1. PG&E gas infrastructure does not exist, is not in close proximity or it is cost prohibitive to extend the infrastructure;
2. Processes and work performed by these customers may be temporary and necessitate a mobile fuel source in lieu of permanent infrastructure (e.g. road paving);
3. The end-use process may not be compatible with electrification (e.g. marine transportation).

¹ "Natural gas is primarily methane (CH₄), which has a higher energy content relative to other fuels, and thus, it has a relatively lower CO₂-to-energy content." Energy Information Administration, <https://www.eia.gov/tools/faqs/faq.php?id=73&t=11>

PG&E's primary interests in proposing these changes is to serve customers requesting gas service from PG&E to create significant volumes of CNG and LNG in northern California. PG&E has been engaged with two entities that have expressed interest in this service for two different purposes: (1) to provide fuel service for remote operations such as road paving, mining, or disaster relief, displacing diesel and (2) to provide a clean burning fuel alternative to heavy fuel oil used in marine vessels.

For remote operations customers, CNG and LNG today is primarily delivered by truck and trailer into northern California from sources outside the PG&E service area. Having sources of transportable CNG and LNG within PG&E's service territory could provide customers with more cost-effective supply while also lowering or eliminating the need for transport from outside the service territory.

In the marine vessel market, a new limit for fuel Sulphur content will be reduced from 3.5% m/m (mass by mass) to 0.50% m/m. Replacing heavy fuel oil with LNG in maritime applications is one of several options to meet the January 1, 2020 International Maritime Organization regulation for Sulphur emissions. Part of the benefit of LNG over low-sulfur diesel or other alternative fuels is that even if emissions standards become more stringent in the future, natural gas falls well below any threshold.² The modifications to the NGV-4 tariff will clarify PG&E is allowing G-NGV4 customers to create LNG for resale purposes.

PG&E's proposed tariff changes are consistent with PG&E's support for a cleaner environment both in terms of GHG reductions and air pollutants. Specifically, regarding non-GHG air pollutants, many counties and cities in PG&E's service territory continue to receive poor and failing grades from the American Lung Association.³ Enabling customers to utilize natural gas instead of diesel and fuel oil will lead to a reduction in emission of pollutants to the betterment of PG&E customers.

PG&E would like to make these tariff changes in a timely manner to accommodate customer requests and respectfully requests an expeditious approval of this advice letter.

Tariff Revisions

The proposed revision to Gas Schedule G-NGV4 expands the applicability of the tariff to include delivery of CNG or LNG and clarifies language regarding the resale of CNG and LNG to entities not served by PG&E. Attachments 1 and 2 are, respectively, the Final Version of Revised PG&E Gas Schedule G-NGV4 and the Redline Version of Revised PG&E Gas Schedule G-GNV4.

² Reuters Article, <https://www.reuters.com/article/us-gas-conference-shipping/marine-shipping-sector-eyes-lng-to-meet-clean-fuel-rules-idUSKBN1JO1FD>

³ <https://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/most-polluted-cities.html>,
<https://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/states/california/>

The proposed revision to Gas Rule 1 is an addition to the Noncore End-Use Customer definition, on Sheet 13, which clarifies that the compressing entity is PG&E's customer. Attachments 1 and 2 are, respectively, the Final Version of Revised PG&E Gas Rule 1 and the Redline Version of PG&E Gas Rule 1.

The submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate Schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than October 7, 2019, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

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

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 2 advice letter become effective on regular notice, October 17, 2019, which is 30 calendar days after the date of submittal.

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. 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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments:

Attachment 1 – Final Version of PG&E Gas Schedule G-NGV4 and Gas Rule 1

Attachment 2 – Redline Version of PG&E Gas Schedule G-GNV4 and Gas Rule 1



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 U39G)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@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) #: 4143-G

Tier Designation: 2

Subject of AL: Proposed Revisions to Expand the Applicability of Schedule G-NGV4 Tariff Noncore Natural Gas Service for Compression on Customer's Premises by Customer and Gas Rule 1

Keywords (choose from CPUC listing): Non-Core, Tariffs

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: 10/17/19

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: 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.
35238-G	GAS SCHEDULE G-NGV4 NONCORE NATURAL GAS SERVICE FOR COMPRESSION ON CUSTOMERS' PREMISES Sheet 1	34352-G
35239-G	GAS RULE NO. 1 DEFINITIONS Sheet 13	34469-G
35240-G	GAS TABLE OF CONTENTS Sheet 1	35232-G
35241-G	GAS TABLE OF CONTENTS Sheet 3	35229-G
35242-G	GAS TABLE OF CONTENTS Sheet 6	35132-G



**GAS SCHEDULE G-NGV4
NONCORE NATURAL GAS SERVICE
FOR COMPRESSION ON CUSTOMERS' PREMISES**

Sheet 1

APPLICABILITY: This rate schedule¹ applies to the transportation of gas on PG&E's Backbone, Local Transmission and/or Distribution Systems: (a) for compression of gas by Customer for dispensing as Compressed Natural Gas (CNG) or liquefaction of gas for sale of Liquefied Natural Gas (LNG) for use in Customer operated vehicles or for ultimate sale to vehicles operated by unaffiliated entities; or (b) for compression of gas into CNG or liquefaction of gas into LNG for delivery via motor carrier or marine vessel to the Customer itself or for ultimate sale to unaffiliated entities where it is impractical or uneconomic for PG&E to provide the service via a pipeline solution. (D)
(N)
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(N)

To qualify for service under this schedule, a Customer must be classified as a Noncore End-Use Customer, as defined in Rule 1. To initially qualify for noncore status, a non-residential Customer must have maintained an average monthly use, through a single meter, in excess of 20,800 therms during the previous twelve (12) months, excluding those months during which usage was 200 therms or less. See Rule 12 for details on core and noncore reclassification.

Customers must procure gas supply from a supplier other than PG&E.

Per D.15-10-032 and D.18-03-017, transportation rates include GHG Compliance Cost for non-covered entities. Customers who are directly billed by the Air Resources Board (ARB), i.e., covered entities, are exempt from paying AB 32 GHG Compliance Costs through PG&E's rates.² A "Cap-and-Trade Cost Exemption" credit for these costs will be shown as a line item on exempt customers' bills.^{3, 4}

TERRITORY: Schedule G-NGV4 applies everywhere within PG&E's natural gas Service Territory.

RATES: The applicable Customer Access Charges and Distribution Level Transportation Rate specified below is based on the Customer's Average Monthly Usage, as defined in Rule 1. Usage through multiple noncore gas meters on a single premises will be combined to determine Average Monthly Usage.

The following charges apply to service under this schedule:

1. Customer Access Charge:

The applicable Per-Day Customer Access Charge is multiplied by the number of days in the billing period.

Average Monthly Use (Therms)	Per Day
0 to 5,000	\$1.10893
5,001 to 10,000	\$3.30279
10,001 to 50,000	\$6.14729
50,001 to 200,000	\$8.06762
200,001 to 1,000,000	\$11.70542
1,000,001 and above	\$99.29227

¹ PG&E's gas tariffs are available online at www.pge.com.

² Covered entities are not exempt from paying costs associated with LUAF Gas and Gas used by Company Facilities.

³ The exemption credit will be equal to the effective non-exempt AB 32 GHG Compliance Cost Rate (\$ per therm) included in Preliminary Statement – Part B, multiplied by the customer's billed volumes (therms) for each billing period.

⁴ PG&E will update its billing system annually to reflect newly exempt or newly excluded customers to conform with lists of Directly Billed Customers provided annually by the ARB.

(Continued)



GAS RULE NO. 1
DEFINITIONS

Sheet 13

NATURAL GAS: See Gas.

NONCORE END-USE CUSTOMER: Noncore End-Use Customers are typically large commercial, industrial, cogeneration, wholesale or electric generation Customers who meet the usage requirements for service under a noncore rate schedule and who have executed a Natural Gas Service Agreement. Electric Generation, Enhanced Oil Recovery, Cogeneration, and Refinery Customers with historical or potential annual use exceeding 250,000 therms per year or rated generation capacity of five hundred kilowatts (500 kW) or larger, are permanently classified as Noncore End-Use Customers.

Customers served under schedule G-NGV4 are PG&E Noncore End-Use Customers (N)
even though they may resell their gas to downstream entities. (N)

NONPROFIT GROUP-LIVING FACILITY: A facility operated by a corporation that has received a letter of determination by the Internal Revenue Service that the corporation is tax-exempt due to its nonprofit status under IRS Code Section 501©(3). The facility must be one of the following:

1. A homeless shelter with 10 or more beds and open at least 180 days per year;
2. Transitional housing, such as a half-way house or drug rehabilitation facility;
3. Short- or long-term care facility, such as a hospice, nursing home, seniors' home, or children's home; or
4. A group home for physically or mentally disabled persons.

With the exception of homeless shelters, the nonprofit group-living facility must provide services such as meals or rehabilitation in addition to lodging. All of the residents of the facility must meet the CARE eligibility standard for a single-person household. At least 70 percent of the gas supplied to the facility's premises must be used for residential purposes, and the facility must be licensed by the appropriate state agency, with the exception of homeless shelters which must have the appropriate municipal or county conditional use permits.

Facilities such as student housing/dormitories are excluded. For complete eligibility requirements see Rule 19.2.

OFF-SYSTEM DELIVERY POINT(S): Any interconnection for delivery outside of PG&E's service territory.

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(T)

(Continued)

Advice 4143-G
September 17, 2019

Attachment 2

Redline Version of PG&E Gas Schedule G- GNV4 and Gas Rule 1



**GAS SCHEDULE G-NGV4
NONCORE NATURAL GAS SERVICE
FOR COMPRESSION ON CUSTOMERS' PREMISES**

Sheet 1

APPLICABILITY: This rate schedule¹ applies to the transportation of gas ~~to customer-owned natural gas-vehicle fueling stations~~ on PG&E's Backbone, Local Transmission and/or Distribution Systems: (a) for compression of gas by Customer for dispensing as Compressed Natural Gas (CNG) or liquefaction of gas for sale of Liquefied Natural Gas (LNG) for use in Customer operated vehicles or for ultimate sale to vehicles operated by unaffiliated entities; or (b) for compression of gas into CNG or liquefaction of gas into LNG for delivery via motor carrier or marine vessel to the Customer itself or for ultimate sale to unaffiliated entities where it is impractical or uneconomic for PG&E to provide the service via a pipeline solution.

To qualify for service under this schedule, a Customer must be classified as a Noncore End-Use Customer, as defined in Rule 1. To initially qualify for noncore status, a non-residential Customer must have maintained an average monthly use, through a single meter, in excess of 20,800 therms during the previous twelve (12) months, excluding those months during which usage was 200 therms or less. See Rule 12 for details on core and noncore reclassification.

(N)
|
|
|
(N)

Customers must procure gas supply from a supplier other than PG&E.

Per D.15-10-032 and D.18-03-017, transportation rates include GHG Compliance Cost for non-covered entities. Customers who are directly billed by the Air Resources Board (ARB), i.e., covered entities, are exempt from paying AB 32 GHG Compliance Costs through PG&E's rates.² A "Cap-and-Trade Cost Exemption" credit for these costs will be shown as a line item on exempt customers' bills.^{3, 4}

TERRITORY: Schedule G-NGV4 applies everywhere within PG&E's natural gas Service Territory.

RATES: The applicable Customer Access Charges and Distribution Level Transportation Rate specified below is based on the Customer's Average Monthly Usage, as defined in Rule 1. Usage through multiple noncore gas meters on a single premises will be combined to determine Average Monthly Usage.

The following charges apply to service under this schedule:

1. Customer Access Charge:

The applicable Per-Day Customer Access Charge is multiplied by the number of days in the billing period.

Average Monthly Use (Therms)	Per Day
0 to 5,000	\$1.10893
5,001 to 10,000	\$3.30279
10,001 to 50,000	\$6.14729
50,001 to 200,000	\$8.06762
200,001 to 1,000,000	\$11.70542
1,000,001 and above	\$99.29227

(N)
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(N)

¹ PG&E's gas tariffs are available online at www.pge.com.

² Covered entities are not exempt from paying costs associated with LUF Gas and Gas used by Company Facilities.

³ The exemption credit will be equal to the effective non-exempt AB 32 GHG Compliance Cost Rate (\$ per therm) included in Preliminary Statement – Part B, multiplied by the customer's billed volumes (therms) for each billing period.

⁴ PG&E will update its billing system annually to reflect newly exempt or newly excluded customers to conform with lists of Directly Billed Customers provided annually by the ARB.



**GAS RULE NO. 1
DEFINITIONS**

Sheet 13

NATURAL GAS: See Gas.

(L)

NONCORE END-USE CUSTOMER: Noncore End-Use Customers are typically large commercial, industrial, cogeneration, wholesale or electric generation Customers who meet the usage requirements for service under a noncore rate schedule and who have executed a Natural Gas Service Agreement. Electric Generation, Enhanced Oil Recovery, Cogeneration, and Refinery Customers with historical or potential annual use exceeding 250,000 therms per year or rated generation capacity of five hundred kilowatts (500 kW) or larger, are permanently classified as Noncore End-Use Customers.

Customers served under schedule G-NGV4 are PG&E Noncore End-Use Customers even though they may resell their gas to unaffiliated entities.

NONPROFIT GROUP-LIVING FACILITY: A facility operated by a corporation that has received a letter of determination by the Internal Revenue Service that the corporation is tax-exempt due to its nonprofit status under IRS Code Section 501©(3). The facility must be one of the following:

1. A homeless shelter with 10 or more beds and open at least 180 days per year;
2. Transitional housing, such as a half-way house or drug rehabilitation facility;
3. Short- or long-term care facility, such as a hospice, nursing home, seniors' home, or children's home; or
4. A group home for physically or mentally disabled persons.

With the exception of homeless shelters, the nonprofit group-living facility must provide services such as meals or rehabilitation in addition to lodging. All of the residents of the facility must meet the CARE eligibility standard for a single-person household. At least 70 percent of the gas supplied to the facility's premises must be used for residential purposes, and the facility must be licensed by the appropriate state agency, with the exception of homeless shelters which must have the appropriate municipal or county conditional use permits.

Facilities such as student housing/dormitories are excluded. For complete eligibility requirements see Rule 19.2.

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OFF-SYSTEM DELIVERY POINT(S): Any interconnection for delivery outside of PG&E's service territory.

(Continued)

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