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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company for Approval of its 2009 Rate Design
Window Proposals for Dynamic Pricing and
Recovery of Incremental Expenditures Required
for Implementation (U 39 E)

Application 09-02-022
(Filed February 27, 2009;
Amended March 13, 2009)

**RESPONSE OF PACIFIC GAS AND ELECTRIC COMPANY
TO THE PETITION FOR MODIFICATION OF THE DIVISION OF RATEPAYER
ADVOCATES, THE CALIFORNIA SMALL BUSINESS ASSOCIATION AND THE
CALIFORNIA SMALL BUSINESS ROUNDTABLE OF DECISION 10-02-032**

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March 7, 2011

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Pursuant to Rule 16.4(f) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Pacific Gas and Electric Company (PG&E) submits this response to the February 4, 2011 Petition for Modification of Decision (D.) 10-02-032 filed by the Division of Ratepayer Advocates, the California Small Business Association and the California Small Business Roundtable (collectively, the Joint Parties).

PG&E addressed the substance of the Joint Parties' Petition in PG&E's February 24, 2011 filing in this docket, which provided PG&E's reply to the comments filed by the Joint Parties (among others) in response to PG&E's January 14, 2011 Petition for Modification of D.10-02-032. (For the convenience of the Commission and the parties, PG&E has attached its February 24, 2011 reply as Attachment A.) PG&E has only one further issue to address at this time.

At the top of page 6 of the Joint Parties' Petition, the Joint Parties request "To promote customer acceptance, Small C&I Customers defaulting from flat rates to TOU rates should be offered one-year of bill protection relative to the preexisting flat (A-1) rate." Ordering Paragraph 3 of D.10-02-032 directed that when small and medium commercial and industrial customers qualified for default PDP, flat rates would no longer be available for the customers.

For small and medium commercial and industrial customers that
have access to at least 12 months of interval billing data, default

Peak Day Pricing rates that include time-of-use rates during non-Peak Day Pricing periods. Such customers can choose to opt out to a time-of-use rate or other time-variant rate. **Flat rates shall no longer be available to these customers.**¹

Therefore, PG&E did not include bill protection for the first year of mandatory TOU in the systems to implement D.10-02-032. The Joint Parties' request would extend bill protection to customers for their first year of mandatory TOU by itself. This proposal would require major system changes, including information technology, that would be both time-consuming and costly. PG&E consequently opposes this aspect of the Joint Parties' Petition.

Respectfully Submitted,

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Dated: March 7, 2011

¹ D.10-02-032, *mimeo*, p. 180, (emphasis added).

ATTACHEMENT A

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February 24, 2011

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TO COMMENTS FILED IN RESPONSE TO ITS PETITION FOR MODIFICATION OF
DECISION 10-02-032**

Pursuant to the permission granted by Administrative Law Judge (ALJ) Fukutome under Rule 16.4(g) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Pacific Gas and Electric Company (PG&E) submits this reply to the comments filed in response to PG&E's January 14, 2011 Petition for Modification of Decision (D.) 10-02-032 (the PDP Decision).¹ The responses were filed on February 14, 2011 by the Division of Ratepayer Advocates (DRA), the California Small Business Association and the California Small Business Roundtable (together "CSBRT/CSBA"), the California Farm Bureau Federation (CFBF) and Southern California Edison Company (SCE).

In brief, PG&E finds much common ground with the other parties. Most notably, there is consensus that the November 1, 2011 deadline for small and medium business (SMB) customers to default to Peak Day Pricing (PDP) should be suspended immediately. There is also no disagreement about postponing the February 1, 2012 deadline for default to mandatory time-of-use (TOU) rates for small and medium-sized agricultural customers. While there are some differences among the parties' recommended approaches for further implementation of PDP, the Commission should act now to postpone (i) the November 1, 2011 date for both default of residential SmartRate™ and SMB customers to PDP and implementation of voluntary PDP for residential customers and (ii) the February 1, 2012 deadline for default to mandatory TOU rates

¹ On February 17, 2011, ALJ Fukutome granted authority to file this reply via telephone to PG&E counsel.

for small and medium-sized agricultural customers. After this postponement, the Commission and parties can address the issues where there are differences. Acting now to address these key dates will (i) provide for much-needed certainty for customers and PG&E regarding these fast-approaching deadlines and (ii) minimize any inefficient use of resources that would result from driving toward deadlines that are to be suspended.

I. BACKGROUND

As mentioned above, on January 14, 2011, PG&E filed a Petition for Modification of the PDP Decision (PG&E's Petition). PG&E's Petition proposed to change the November 1, 2011 default date for SMB customers. It also requested changes to the PDP Decision's implementation dates for mandatory small and medium-sized agricultural TOU rates, and residential opt-in PDP rates in place of SmartRate™. PG&E's Petition also sought clarifications concerning the cost recovery method adopted in the PDP Decision due to developments in PG&E's 2011 General Rate Case (GRC).

On February 4, 2011, DRA and CSBRT/CSBA (the Joint Parties) filed their own Petition for Modification of the PDP Decision (the Joint Petition). The issues raised in the Joint Petition are closely related to PG&E's Petition. The Joint Petition stated support for PG&E's request to postpone the November 1, 2011 deadline for small business customers,² but the Joint Petition also stated that PG&E's Petition did "not go far enough to address the problems small business will have with dynamic pricing."³ The Joint Parties did not oppose mandatory TOU rates for small customers, but the parties did oppose its "abrupt introduction without a staged, customer-readiness driven process."⁴ Therefore, the Joint Parties recommended that small customers

² The Joint Parties refer to a small business customer class. However, PG&E's rate applicability does not make a distinction between small and medium-sized business customers, nor was that distinction required by D.10-02-032. Thus, for purposes of these reply comments, PG&E refers to small business customers in conjunction with medium-sized business customers, collectively as SMB customers. Yet, it should be noted that in PG&E's currently-pending 2011 GRC Phase 2 proceeding, DRA has proposed defining the small customer class as customers with demands not exceeding 20kw. That proposal has not been adopted and may be opposed. Moreover, until SmartMeter™ devices are installed on all customers and 12 months of interval data has been collected, PG&E will not have the demand related information needed to administer DRA's GRC Phase 2 proposal.

³ Joint Petition, p. 7.

⁴ See DRA Comments, p. 2, fn. 1.

transition to TOU only after certain acceptance criteria were met and that PDP would only be offered to small customers on an “opt-in” basis.⁵

On February 14, 2011, DRA, CSBRT/CSBA, CFBF, and SCE filed responses to PG&E’s Petition. DRA and CSBRT/CSBA reiterated their support for the approach described in their Joint Petition, and recommended that the November 1, 2011 deadline be suspended.⁶

Recognizing the urgency of taking action, DRA stated:

DRA also urges the Commission to immediately suspend the Nov. 1, 2011 PDP implementation date while it deliberates the broader issues contained in PG&E’s Petition. If it does not do so soon, PG&E is going to have to continue preparing for the default PDP on 11/1, and potentially ends up wasting money if that proves not to be necessary.⁷

DRA also recommended that the PDP Decision be modified to eliminate the requirement for default PDP for the residential customer class.⁸ Finally, with respect to PG&E’s cost-recovery proposal, DRA urged the Commission “to preserve the ability to determine the reasonableness of the costs in light of any changes to the Commission’s timetable for implementing dynamic rates.”⁹

CFBF expressed its support for PG&E’s proposed extension of the required default to mandatory TOU for small and medium-sized agricultural customers from February 2012 to March 2013, stating that it would “allow for needed flexibility in enacting the required measures and to ensure appropriate information and tools are provided to agricultural customers defaulted to TOU.”¹⁰

SCE generally supported PG&E’s Petition, though SCE expressed its preference “not to impose a default CPP/TOU rate structure” on SMB customers “even after they have had some experience on TOU rates.”¹¹

⁵ Joint Petition, p. 7.

⁶ DRA Comments, p. 2; CSBRT/CSBA Comments, p. 3.

⁷ DRA Comments, p. 2.

⁸ DRA Comments, p. 4.

⁹ DRA Comments, p. 8.

¹⁰ CFBF Comments, p. 1.

¹¹ SCE Comments, p. 3.

II. DISCUSSION

As explained above, while the parties may disagree on the best approach for implementation of dynamic pricing in the medium- and long-term, the affected parties agree with the near-term goals of postponing the November 1, 2011 deadline for default of SMB customers and the February 1, 2012 deadline for mandatory TOU for small and medium-sized agricultural customers. As discussed in Subsection A below, the Commission should act now to suspend these deadlines. In addition, as discussed in Subsection B below, there are a number of remaining issues that the Commission should resolve separately from the immediate suspension of the deadlines.

A. The Deadlines for Defaulting Customers to TOU and Critical Peak Pricing Should be Suspended Now.

1. The November 1, 2011 Deadline for SMB Customers and Residential Customers Should be Suspended.

PG&E's Petition seeks to change the PDP Decision's default provisions for SMB customers to transfer to mandatory TOU or PDP.¹² Currently, the PDP Decision sets an implementation date of November 1, 2011 to start defaulting SMB customers to mandatory TOU pricing with PDP event days. Parties are united in their concern about this default implementation date that is merely eight-months away, and its expected adverse effect on customers. PG&E, DRA and CSBRT/CSBA agree on the following major points:

¹² PG&E provides the following definitions for the convenience of the reader.
Time-of-Use Rates: TOU rates consist of several pre-defined time periods and charge customers different pre-determined rates during each time period. For example, during the summer, the rate charged during the afternoon is generally higher than the rate charged at night. The different rates reflect the fact that it is generally more expensive to serve customers during some time periods. TOU rates do not change based on current market conditions. Different TOU rates are set for the summer and the winter seasons. TOU rates currently are mandatory for large non-residential customers, and are voluntary for other non-residential customer classes and for residential customers. Public Utilities Code Section 745(a)(2) defines "time variant pricing" to include time-of-use rates.
Critical Peak Pricing and Peak Day Pricing: Critical Peak Pricing (CPP) generally describes rates where a very high rate will apply to a customer's usage during CPP events. The high rate applies to all of the customer's usage during the CPP event. The CPP event is called based on system conditions, such as temperature, which are described in the tariff. CPP events are for specific hours and are called on a day-ahead basis. There are a limited number of CPP events a year. CPP rates are only applicable to bundled customers. Non-residential CPP pricing is called Peak Day Pricing (PDP) in PG&E's current tariffs.

- The November 1, 2011 default date for mandatory TOU and default PDP for small customers must be suspended immediately.
- Well-planned, effective outreach and education is absolutely critical before and during the transition of SMB customers to mandatory TOU and default PDP.
- Coordinated, integrated provision of information and solutions on energy efficiency and demand response to help SMB customers manage their usage during PDP and non-PDP periods is very important.

PG&E thus urges the Commission to suspend the November 1, 2011 default date immediately. Until that date is lifted, PG&E must prepare to default SMB customers to mandatory TOU and PDP. That work includes starting the outreach and education work, such as the customer contacts required in Ordering Paragraph 11 of D.10-02-010, and expending the approved funds. Time is of the essence. If PG&E commences outreach work for the November 1, 2011 default only to have such deadline suspended later, this false-start will likely cause customer confusion and dissatisfaction, as well as inefficient use of limited financial resources.

As previously mentioned, DRA urges the same course of action:

DRA also urges the Commission to immediately suspend the Nov. 1, 2011 PDP implementation date while it deliberates the broader issues contained in PG&E's Petition. If it does not do so soon, PG&E is going to have to continue preparing for the default PDP on 11/1, and potentially ends up wasting money if that proves not to be necessary.¹³

This logic applies not only to the November 1, 2011 deadline for SMB customers, but also the November 1, 2011 deadline that would transition residential SmartRate customers to a new PDP rate. Acting now to suspend the November 1, 2011 deadline for both SMB and residential customers would allow the Commission time later to resolve the broader issues raised by PG&E and the Joint Parties.

¹³ DRA Comments, p. 2.

2. The February 1, 2012 Deadline for Defaulting Small and Medium-Sized Agricultural Customers Should Also be Suspended.

PG&E also requests that the Commission immediately suspend the February 1, 2012 default date of small and medium-sized agricultural customers to TOU. As discussed above in the case of SMB customers, if the Commission does not suspend the February 2012 date, PG&E will still be required to prepare for the default of these customers in late 2011. Perhaps more importantly, however, while it is PG&E's intent to gain Commission approval of all the proposed default dates for the reasons stated in the Petition to Modify, PG&E would likely separately request a suspension or delay of the default of small and medium-sized agricultural customers to TOU if that request is not granted in the Commission's initial decision addressing PG&E's Petition. This need arises because rate information needed to educate these customers will not be available until the Commission issues its decision adopting agricultural rate design in the pending 2011 GRC Phase 2 proceeding.

Specifically, in authorizing the default of small and medium-sized agricultural customers to TOU in D.10-02-032, the Commission responded to the Agricultural Energy Consumers Association's (AECA) expressed concern that PG&E's analysis of bill impacts¹⁴ was inadequate to prevent the risk that large numbers of agricultural customers could be inadvertently penalized by migrating to TOU.¹⁵ The Commission subsequently ordered that PG&E study these impacts based on 10,000 customers with 12 months of SmartMeter™ interval data.¹⁶ On November 30, 2010, PG&E submitted its report to the Energy Division based on agricultural customers with SmartMeter™ devices. While PG&E did not have, at that time, data for 10,000 customers, PG&E's report based on a smaller number of customers again confirmed that nearly all customers would benefit from the migration to TOU based on existing rate relationships.

However, with default of small and medium-sized agricultural customers now scheduled

¹⁴ See PG&E Rebuttal Testimony by Andrew Bell (Exhibit (PG&E-7), Chapter 2, p. 2-17). PG&E's analysis based on the rate relationships at the time and based on customer characteristics of its agricultural Class Load Research Population sample indicate that more than 95 percent of agricultural customers would benefit by migration to TOU.

¹⁵ D.10-02-032, *mimeo*, p. 43.

¹⁶ See D.10-02-032, *mimeo*, p. 187, Ordering Paragraph 25.

for February 2012, these customers may not default under the rate relationships studied by PG&E to date. In Phase 2 of PG&E's 2011 GRC, PG&E has proposed revenue-neutral rate design for its agricultural schedules which would have the effect of reducing agricultural non-TOU rates and increasing agricultural TOU rates. These rate adjustments, if approved by the Commission, would provide a much more even distribution of winners and losers from default to TOU. This change, or a different change approved by the Commission, would directly impact customers that are transitioning to TOU since PG&E expects a decision in this portion of its GRC Phase 2 proceeding in late 2011. PG&E must have adequate time after a Phase 2 decision to assess the impacts of this migration to agricultural customers and to educate customers appropriately based on then-current rate relationships. Accordingly, in addition to the reasons stated above for SMB customers, PG&E requests the Commission to also suspend the default of agricultural customers to TOU until well after a 2011 GRC Phase 2 decision is rendered on agricultural rate design, if the Commission does not fully address its Petition at this time. PG&E believes its proposed default date of March 1, 2013 would provide a suitable time period after a decision in Phase 2 of the GRC.

B. The Commission Should Resolve the Remaining Issues Separately from the Suspension of the November 1, 2011 and February 1, 2012 Deadlines.

There are three main areas of difference among the parties. These differences are in the nature of how to best inform and educate customers, not with the fundamental need for customers to be adequately informed and educated before these new rate changes are implemented. First, DRA urges a modification to the PDP Decision for residential customers that is unnecessary in PG&E's opinion. Second, DRA and PG&E appear to recommend different approaches for resolving certain cost-recovery issues. Third, the parties disagree on the best manner of implementing TOU and PDP rates for SMB customers. Each of these areas of difference is discussed, in turn, below. However, PG&E urges the Commission to resolve the timing issues addressed in Subsection A on an expeditious basis, without waiting to resolve the remaining issues discussed below.

1. The Commission Should Reject DRA’s Recommendation Concerning Modifying the PDP Decision for Residential Customers as Unnecessary.

DRA expresses its support for PG&E’s proposal to continue SmartRate™ for residential customers instead of transferring such customers to a new PDP rate. However, DRA goes further and “recommends that D.10-02-032 be further modified to eliminate the requirement for default PDP for the residential customer class.”¹⁷ As a point of clarification, the PDP Decision does not require default PDP for residential customers. Rather, the PDP Decision adopted a proposal under which PG&E would implement a PDP rate that would replace the SmartRate™ design for those customers affirmatively electing that option.¹⁸ Moreover, D.08-07-045 (Ordering Paragraph 8) only required PG&E to file a proposal to default residential customers to PDP and did not require that these customers actually default to PDP. With this clarification, there is little, if any, difference between the positions of PG&E and DRA with respect to residential customers, including retaining and promoting SmartRate™ for residential customers during the pendency of further consideration of residential rate design issues. PG&E’s required filing to default residential customers to PDP (A.10-08-005) could be used as a forum to address the strategic residential rate design issues, or these issues could be deferred to Phase 2 of PG&E’s 2014 GRC.

2. The Commission Should Adopt PG&E’s Proposed Clarifications Concerning Cost-Recovery.

PG&E’s Petition did not seek additional funding, however, it did seek certainty of recovery of the expense amounts already approved by the PDP Decision due to developments in PG&E’s 2011 GRC.¹⁹ DRA was the only party to comment on PG&E’s cost-recovery request. DRA found PG&E’s requested relief “unclear” and recommended that the Commission retain certain language in Ordering Paragraph 24 of the PDP Decision “to allow the parties to review the reasonableness of the cost of implementing PDP, taking into consideration any deviation

¹⁷ DRA Comments, p. 4.

¹⁸ D.10-02-032, *mimeo*, pp. 48-49.

¹⁹ PG&E’s Petition, p. 2.

from the [dynamic pricing] implementation timetable adopted in D.10-02-032 resulting from granting PG&E's Petition in full or in part."²⁰

Citing PG&E's proposed implementation delays for SMB customers, small and medium-sized agricultural customers and for new residential PDP, DRA argued "that the costs incurred for 2011 and subsequent years for DP implementation activities are likely to be impacted."²¹ DRA continued, "In particular, DRA believes that it is reasonable to expect savings if the Commission allows PG&E to not implement residential PDP as ordered by D.10-02-032."²² Given DRA's support for additional efforts to ensure that customers are fully aware of and informed on their rate options (as discussed below), DRA's expectation that PG&E's spending is likely to go down is perplexing and counter-intuitive. Further, DRA's suggestion should be dismissed for three main reasons.

First, DRA's argument emphasizes PG&E's proposed delay in implementing residential PDP as a factor that should drive down PG&E's remaining costs.²³ Such a delay should have an insignificant effect on PG&E's costs authorized in the PDP Decision. The vast majority of PG&E's forecasted spending for the next three years is in customer outreach and PG&E has received no funding for residential customer outreach in the PDP Decision. The Commission there acknowledged:

PG&E makes no request in this proceeding for incremental cost recovery for outreach and education for residential customers. PG&E states that outreach costs for the residential optional PDP rate program will be covered by customer acquisition cost recovery authorized in the AMI decision. PG&E also states that it plans to leverage experience from SmartRate outreach to reduce residential customer acquisition costs and increase their participation rates.²⁴

²⁰ DRA Comments, pp. 5 and 7.

²¹ DRA Comments, p. 7.

²² DRA Comments, p. 7.

²³ DRA Comments, pp. 6-7.

²⁴ D.10-02-032, *mimeo*, p. 80. The only expenses for residential customers authorized by D.10-02-032 were pertinent to Information Technology, Customer Inquiry, Load Impact Studies, and Billing, Revenue and Collection. For all customer classes (including residential), \$6.7 million in total was authorized in these areas. Of that amount, \$2.1 million has been spent through 2010, leaving only \$4.6 million for the subsequent period for PDP-related activities for all customer classes. While it is true that this amount would no longer need to be spent in the same timeframe under PG&E's proposal, the portion of this amount that

Second, DRA's argument that overall spending may decrease ignores the fact that, under PG&E's staged implementation proposal (i.e., first TOU, followed by PDP), customer outreach costs could increase, not decrease. Despite the possibility of increased costs, as previously stated, PG&E is not seeking additional costs in this proceeding. Furthermore, PG&E is not seeking to change the language in Ordering Paragraph 24 – highlighted on page 7 of DRA's comments -- that requires reasonableness review of amounts expended by PG&E if they exceed the previously authorized amounts.

Third, DRA fails to substantively address the risk to PG&E of undertaking Commission-directed activities without assurance of cost recovery. The scenario proposed by DRA, which would require reasonableness review of all PDP costs authorized in the PDP Decision that are incurred in 2011 or thereafter, offers even greater risk to PG&E than the current language in Ordering Paragraph 24. Whenever the Commission directs PG&E to engage in certain activities, but leaves the funding of those activities subject to doubt, PG&E faces unfair exposure to losses. This is because – at best – PG&E will be entitled to recover the costs it incurs sometime well after the date those costs are incurred. Thus, at best, PG&E can collect something less than 100 cents for every dollar spent, taking into account the time value of money. Moreover, second-guessing of expenditures could lead to disallowances of spending, making PG&E's potential downside far more significant. In addition to the unfairness this presents to PG&E, these pressures create disincentives for appropriate levels of spending.

Accordingly, the Commission should ignore DRA's comments in this area and adopt PG&E's proposed changes to Ordering Paragraph 24. These changes merely seek certainty of recovery of amounts already authorized in light of developments in PG&E's 2011 GRC. PG&E's recommended changes neither expand the level of funding authorized to PG&E nor eliminate reasonableness review of amounts spent beyond the authorized amounts.

would have been attributable to residential customers is a small fraction of the overall spending and should not drive an outcome here.

In terms of timing, this issue is also of importance to PG&E. However, if the Commission immediately suspends the November 1, 2011 and February 1, 2012 deadlines, such a suspension would take significant pressure off of PG&E's spending for 2011. Accordingly, with such a suspension, PG&E would support deferral of the cost recovery issue until consideration of the other PDP implementation issues raised elsewhere by PG&E's Petition and the Joint Petition.

3. The Commission Should Address the Other Major Issues Raised by the Joint Parties in Workshops or Through Testimony and Evidentiary Hearings.

In addition to the issues raised in PG&E's Petition, the Joint Parties propose far more extensive changes to the PDP Decision for the small business customer class in their own petition. The Joint Parties' suggested changes include:

- Eliminate default PDP and offer it to small customers on an opt-in basis only.
- Offer new default A-1 TOU rates with opt-out to flat rate, when 30 percent of the small customers in the class have opted-in and awareness of TOU features and rates is at 80%.
- Implement mandatory A-1 TOU rates when 60 percent of the customers in the class have accepted service on the default TOU rate and awareness of TOU features and rates is at 90%.
- Only offer the new default TOU and mandatory TOU rates if complaints from small customers on time-varying rates remain at acceptably low levels.
- Allow SMB customers with the following issues to opt-out to flat rates: health and safety of workers/customers/patients, public health and safety, lack of available technologies for reducing electric use, and documented economic hardship and loss of jobs.

- Target dates of (1) December 31, 2013 for the awareness and opt-in levels for default TOU, and (2) December 31, 2015 for mandatory TOU.²⁵

Importantly, PG&E has no objection to the proposed conversion of PDP to an “opt-in” tariff, nor does PG&E have any objection to the proposed target dates should the Commission deem them warranted.

However, there remains a difference between the positions of the Joint Parties and PG&E. This concerns the Joint Parties’ criticism of PG&E’s Petition for being “date driven.”²⁶ Instead of having transitions being driven by calendar dates, the Joint Parties recommend that transitions be driven by levels of customer awareness. To move from one stage to the next, the Joint Parties would require a showing that the target group is either 80 or 90 percent aware, and have a conceptual understanding, of the upcoming rate change.²⁷

In theory, the Joint Parties’ “awareness-driven” proposal has much appeal. The notion of not transitioning customers until they are substantively aware of what is about to happen to them appeals to simple principles of fairness. However, in practice, the Joint Parties’ proposal, as currently developed, is not feasible.

For instance, the Joint Parties have not provided any data that would suggest that it is feasible to generate and measure awareness levels of 80 to 90 percent. General market research indicates that it is very hard to achieve 80-90 percent polling on even the most simple of concepts. Hence, it is possible that such levels of awareness could never be achieved for TOU, and thus the level of awareness recommended by the Joint Parties would not provide a practicable path toward implementation of the rate changes.

Another flaw in the Joint Parties’ proposal is that it does not provide a feasible method for how such awareness is to be defined or measured. Depending on these factors, there may be additional obstacles to ever reaching the thresholds proposed by the Joint Parties. It is also

²⁵ Joint Petition, pp. 5-7.

²⁶ Joint Petition, p. 8.

²⁷ Joint Petition, pp. 5-6.

possible that polling participants adverse to the concept of dynamic pricing – who know that denying knowledge of the upcoming changes could cause them never to arrive – will deny knowledge of dynamic pricing changes to forestall such changes.

As well, the Joint Parties’ proposal fails to acknowledge the greater challenges in communicating to customers about a change that will come at an uncertain future time, or perhaps (depending on awareness results) never come at all. Customer outreach about a certain event happening on a certain date is far easier to convey – and for customers to understand – than a description about an event at an uncertain time. Similarly, businesses may find it easier to plan their operations around a known event as opposed to one of uncertain timing.

Furthermore, under current conditions, the exception for “lack of available technologies” could essentially make the Joint Parties’ proposal a nullity. This occurs because air conditioner (AC) cycling is the only demand response technology commercially available for small customers to reduce electricity usage. The Joint Petition also provides no information about how other important exceptions would be administered (e.g., health and safety, economic hardship, loss of jobs). These types of exceptions can be very subjective, very difficult to administer, and nearly impossible to enforce.

With these concerns in mind, PG&E appreciates and agrees with the Joint Parties’ intent, but concludes that the Joint Parties’ proposal is well-meant, but currently impractical. Nonetheless, building upon the limited information provided to date, PG&E is willing to work with the Joint Parties and other interested parties to see if their proposals can be revised to address their current shortcomings and likely costs. Similarly, if the Commission is interested in pursuing the Joint Parties’ ideas further, PG&E recommends that informal discussions or workshops, and, as appropriate, testimony and evidentiary hearings, should follow the granting of the schedule suspension discussed above.

III. CONCLUSION

The parties agree that SMB customers will not be ready for mandatory TOU and default PDP beginning November 1, 2011. However, PG&E believes that many aspects of the Joint

Parties' proposal for transitioning small customers to dynamic pricing are infeasible.

Accordingly, the Commission should take the following steps:

- Immediately suspend the current November 1, 2011 implementation date for SMB and residential customers.
- Immediately suspend the current February 1, 2012 implementation date for small and medium-sized agricultural customers.
- Adopt PG&E's cost-recovery clarification set forth in PG&E's Petition.
- The awareness-driven approach as currently designed and urged by the Joint Parties should be rejected as infeasible. The Commission may wish to establish workshops or additional proceedings to take evidence on matters such as the following:
 - how should "small business customer" be defined for proposals,
 - what changes are appropriate in the way small customers are transitioned to time-variant pricing,
 - to the extent that awareness-based thresholds are used for the transition, the level of the threshold that is appropriate, the definition of that threshold and how it should be measured,
 - what are the timing and costs of the proposed changes,
 - what are the ramifications for customer outreach and education,
 - what are the ramifications for customer operations,
 - what are the administrative issues, including advantages and difficulties associated with the approach,
 - what are the availability, timing and coordination of possible energy efficiency and demand response assistance to SMB customers to help them manage their electricity usage.

For the foregoing reasons, PG&E respectfully requests that the Commission grant the suspension on the November 1, 2011 and February 1, 2012 implementation dates. Further,

PG&E reiterates its request for the other modifications set forth in its Petition, as discussed, on a schedule that would allow the Commission more time to deliberate the important issues therein.

Respectfully Submitted,

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By: _____ /s/
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Dated: February 24, 2011

CERTIFICATE OF SERVICE BY U.S. MAIL OR ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department, PO Box 7442, San Francisco, CA 94120.

On the **24th day of February, 2011**, I caused to be served true copies of:

**REPLY OF PACIFIC GAS AND ELECTRIC COMPANY
TO COMMENTS FILED IN RESPONSE TO ITS PETITION FOR MODIFICATION OF
DECISION 10-02-032**

on the official service list for **A.09-02-022** by electronic mail for those who have provided an e-mail address and by U.S. mail for those who have not.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the **24th day of February, 2011**.

/s/

Tauvela U'u

CERTIFICATE OF SERVICE BY U.S. MAIL OR ELECTRONIC MAIL

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On the 7th of **March, 2011**, I caused to be served true copies of:

**RESPONSE OF PACIFIC GAS AND ELECTRIC COMPANY
TO THE PETITION FOR MODIFICATION OF THE DIVISION OF RATEPAYER
ADVOCATES, THE CALIFORNIA SMALL BUSINESS ASSOCIATION AND THE
CALIFORNIA SMALL BUSINESS ROUNDTABLE OF DECISION 10-02-032**

on the official service list for **A.09-02-022** by electronic mail for those who have provided an e-mail address and by U.S. mail for those who have not.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 7th day of **March, 2011**.

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