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

Application of Pacific Gas and Electric Company
To Revise Its Electric Marginal Costs, Revenue
Allocation, and Rate Design.

U 39 M

Application No. 13-04-012
(Filed April 18, 2013)

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY TO SHORTEN
THE PERIOD TO FILE COMMENTS ON THE MOTIONS TO ADOPT
THE SMALL AND MEDIUM COMMERCIAL RATE DESIGN
SETTLEMENTS**

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Dated: September 5, 2014

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As promised in the Status Report filed on August 29, 2014 in this docket, and pursuant to Rule 11.1 of the Commission's Rule of Practice and Procedure, PG&E hereby moves to shorten the period to file comments on the Small and Medium Commercial Rate Design Settlements which we expect to file today. As explained in that Status Report and below, PG&E requests that the time for Protests be shortened to September 15, 2014 in light of September 19 Rebuttal Testimony and October 9 to 10 hearing dates.

1. Settlements Filed To Date

During July, 2014, PG&E, on behalf of the various Settling Parties, filed Motions for adoption of settlements and settlement agreements in this proceeding involving Marginal Costs and Revenue Allocation, Residential Rate Design, and Large Light and Power/Standby Rate Design (LLP). Under Rule 12.2 of the Commission's Rules of Practice and Procedure, comments on proposed settlements are due 30 days after service of the settlement. No protests to any of these settlements were filed by the deadlines in August.^{1/} Similarly, on August 29, Settlements on Streetlight Rate Design and Schedule E-

1/ The LLP Settling Parties identified one issue the parties agreed should be litigated during the hearings to be held October 9-10, namely: whether Net Energy Metering customers should become eligible for the Peak Day Pricing Program.

CREDIT Rate Design were filed. Although the deadlines for comments on these settlements have not yet run, PG&E does not expect to receive protests of either settlement.

Settlement agreements have been completed among a subset of the parties interested in Small Commercial rate design (SCRD), and Medium Commercial (MCRD) rate design (collectively SMC) Those settlements are being filed today, along with this Motion.

2. Time Should Be Shortened For Filing Protests on the Small and Medium Commercial Rate Design Settlements

As previously reported, the settling parties expect that aspects of these settlements will be opposed. An Assigned Commissioner’s Revised Scoping Memo issued August 19, 2014 set a schedule for consideration of these commercial rate design issues (and the related LLP rate design issue) as follows:

Rebuttal testimony on SMC/LLP	September 19, 2014
Evidentiary Hearings on SMC/LLP	October 9 - 10
Opening Briefs on litigated SMC/LLP	November 3, 2014
Reply Briefs on litigated SMC/LLP	November 21, 2014

Given that rebuttal testimony on any contested SMC/LLP issues is due on September 19th, PG&E and the settling parties move to shorten the period typically allowed for responding to settlements. Instead, as specifically mentioned in the Status Report filed on August 29, a response date of September 15 should be set. Such a motion to shorten time is necessary so that the specific issues that are actually being opposed can be ascertained before rebuttal must be finalized for service on September 19. As mentioned in the August 29 Status Report, PG&E has communicated with the solar parties who are likely to oppose aspects of these settlements, and they are aware of the fact that the settling parties will be requesting a shortened timeframe for their response, which the settling parties believe is necessary to allow the proceeding to stay on track for the October 9 – 10 dates set for hearings.

3. Issues Requiring Litigation

The Settling Parties to this proceeding have, to date, identified two commercial and industrial rate design issues, on which no settlement could be reached. The parties recognize that have these issues will proceed to litigation:

1. If the Commission adopts PG&E's proposal that customers with load between 75 and 500 kW should move off the A-6 rate schedule, whether there should be grandfathering for commercial Net Energy Metering (NEM) solar customers that had previously been on Schedule A-6 who would otherwise be placed on Schedules A-10 or E-19V as a result of the change in the eligibility threshold for Schedule A-6.
2. Whether commercial NEM solar customers, either on Small, Medium or Large Light and Power rates should be eligible to take service on Peak Day Pricing rate options.

In addition, it is expected that aspects of the Small Commercial and Medium Commercial Rate Design Settlements will be opposed by SEIA and CALSEIA. Specifically, SEIA may also (1) oppose the proposal by the Settling Parties in the Small Commercial rate design settlement to reduce the eligibility threshold from 500 kW to 75 kW for Schedule A-6, or alternatively in the event the Commission adopts the revised eligibility threshold for Schedule A-6, (2) support the adoption of Schedule A-8, which would be designed in a manner similar to Schedule A-6 for customer between 75 and 500 kW, in opposition to the Medium Commercial Settlement. Finally, SEIA may oppose the rate design for Schedules A-6 and A-10. It would be useful to know in particular the issues that are contested, beyond the ones that are expected.

Accordingly, PG&E requests that the time for filing comments on the Small and Medium Commercial Rate Design Settlements be shortened to September 15, 2014.

Respectfully submitted,

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