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

A1003014

Application of Pacific Gas and Electric Company To Revise Its Electric Marginal Costs, Revenue Allocation, and Rate Design, including Real Time Pricing, to Revise its Customer Energy Statements, and to Seek Recovery of Incremental Expenditures.

Application No. 10-03-_____

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**APPLICATION OF PACIFIC GAS AND ELECTRIC
COMPANY**

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I. INTRODUCTION

Pursuant to Article 2 and Rule 3.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission); Public Utilities Code (PUC) Sections 451, 454, 491, 701, 728, and 729; the Commission's Rate Case Plan (RCP) as set forth in Decision (D.) 89-01-040; Ordering Paragraphs (OP) 7 and 14 of D. 08-07-045 directing the inclusion of a Real Time Pricing (RTP) proposal, and a revenue requirement for its implementation, in this Application; and the Assigned Commissioner's March 5, 2010, Ruling and Scoping Memo, p. 7, in PG&E's 2011 Phase 1 General Rate Case (GRC) Application (A.) 09-12-020, PG&E files this Application to revise its electric marginal costs, revenue allocation, and rate design, to propose RTP for its customers, and to seek recovery of incremental expenditures required to implement RTP rates.¹

¹ Pursuant to the Rate Case Plan (RCP), PG&E's Phase 2 application must be filed 90 days after Phase 1. PG&E filed its 2011 GRC Phase 1 application on December 22, 2009. Thus, PG&E's Phase 2 filing is due March 22, 2010. On November 19, 2009, Executive Director Paul Clanon confirmed that PG&E could file its 2011 GRC Phase 2 application 90 days after it files its Phase 1 application despite the reference in OP 7 of D. 08-07-045 to a March 1, 2010 filing date.

Also, pursuant to D.05-11-009 and D. 07-07-047, wherein the Commission expressed the need for more customer friendly energy statements; PUC Section 739(e)(1), which requires PG&E to provide additional information on energy statements and to change the calculation of PG&E's customer bills in its "next general rate case;" and to incorporate dynamic pricing information, PG&E proposes to adopt revised customer energy statements (RCES) and to seek recovery of expenditures required to implement such energy statements that are outside of costs forecast in PG&E's 2011 Phase 1 GRC. PG&E is seeking cost recovery for this activity in a GRC Phase 2 proceeding because it believes that the timing is appropriate given recent regulatory and legislative changes to the billing requirements and the need to finalize the design proposals for Peak Time Rebate (PTR) (A.10-02-028) and RTP.

PG&E estimates that the incremental costs in 2009 through 2013 for the RTP proposal contained in this Application total \$17.0 million, of which \$8.4 million is for capital expenditures and \$8.6 million is for expense. PG&E's requested revenue requirement for implementation of RTP is \$7.0 million for 2009 through 2013, with \$1.0 million to be recovered in electric rates beginning January 1, 2012, or as soon thereafter as practicable, \$0.5 million to reduce electric rates beginning January 1, 2013, and \$6.5 million to be recovered in electric rates beginning January 1, 2014. Thereafter, the capital-related costs (such as return, taxes and depreciation) would be recovered in base rates in PG&E's next GRC, Phase 1.

PG&E estimates that the costs in 2011 through 2013 for the RCES proposal total \$36.1 million, of which \$23.4 million is for capital expenditures and \$12.7 million is for expense. These costs include only costs and scope of work that are outside of PG&E's pending 2011 GRC Phase 1 proceeding. PG&E's requested revenue requirement for implementation of the new bill is \$5.6 million for 2011 through 2013, with \$5.2 million to reduce gas and electric rates beginning January 1, 2012, or as soon thereafter as practicable, and \$10.8 million to be recovered in gas and electric rates beginning January 1, 2013. The revenue requirement for the RCES will be allocated 55 percent to electric customers and 45 percent to gas customers based on the

average number of customers receiving electric and gas energy statements. Thereafter, the capital-related costs would be recovered in base rates in PG&E's next GRC, Phase 1

The total costs requested herein for 2009 through 2013 are \$53.0 million, of which \$31.8 million is for capital expenditures and \$21.2 million is for expense. The total revenue requirement requested for 2009 through 2013 is \$12.6 million. PG&E requests that the Commission find the estimated incremental costs for implementing PG&E's RTP proposal are reasonable, adopt the forecast costs for implementing RCES, which are outside the costs and scope of work set forth in the pending 2011 GRC Phase 1 proceeding, and authorize recovery of the amounts requested.

For reasons set forth in Exhibit (PG&E-3), Chapter 1, "Policy for Dynamic Pricing and Revised Customer Energy Statement," and in a Petition to Modify (PTM) D. 08-07-045, PG&E proposes to implement RTP beginning May 1, 2012, under its proposed case schedule, or 12 months after a final Commission decision on its RTP rate and cost recovery proposals, whichever is later.² Thus, if the final decision herein is in April 2011, PG&E requests that the implementation date for RTP be May 2012.

PG&E proposes to implement the RCES in the fourth quarter of 2012. A delay in the final decision in this proceeding likely would impact PG&E's ability to meet the proposed RCES 2012 implementation date.

II. EXECUTIVE SUMMARY

In this 2011 GRC Phase 2 Application, PG&E proposes marginal cost, revenue allocation and rate design initiatives that continue toward the key objectives of (1) redesigning electric rates to more closely align with cost-causation principles; and (2) simplifying electric rates and tariffs to make them easier for customers to understand. These objectives also informed PG&E's 2007 GRC Phase 2 case. In this Application, PG&E proposes to continue the movement of electric rates closer to cost of service, while also taking into consideration equity among customers and customer acceptance.

² D.08-07-045 specifies a RTP implementation date of May 1, 2011.

PG&E's proposals revise or update revenue allocation and rates for distribution, generation and public purpose programs (PPP). As a result of these changes, total bundled rates change. PG&E's proposed rate change for each bundled service class is illustrated in Table 1 below. The average bundled rates shown in Table 1 are calculated using PG&E's March 1, 2010 authorized revenue requirement. The rates shown in column (2) are a result solely of the marginal cost and revenue allocation methods proposed in this Application, and do not reflect any adjustments or caps that would mitigate the rate changes to any particular class. PG&E proposes price mitigation by moving all customer groups 50 percent to full cost-of-service.³ PG&E's proposed rates at 50 percent movement to cost are shown in column (5) of Table 1. Column (6) shows the resulting percentage increases for bundled customers.⁴

For rate and tariff simplification, and to enhance equity, PG&E proposes several changes to make its rates fairer, easier to understand and to apply, including:

- (1) elimination or closure of certain rate schedules;
- (2) introduction of a modest customer charge for all residential customers, \$2.40 for California Alternative Rates for Energy (CARE) customers, and \$3.00 for non-CARE customers, bringing residential charges more into line with charges applicable to other customer classes;
- (3) collapsing of residential Tiers 3-5 into a single Tier 3, which will affect non-CARE customers only;⁵
- (4) introduction of a Tier 3 rate for CARE customers with usage in excess of 130 percent of their baseline quantities, bringing PG&E's CARE rates more into line with those of other California utilities;

³ In addition, since PG&E's proposed 50 percent movement towards marginal cost still leaves the Streetlight class with a rate increase in excess of 12 percent, PG&E is proposing to cap the Streetlight allocation at 7.5 percent.

⁴ At this level of price mitigation, the Streetlight class would receive the highest percent increase, 7.5 percent, while the residential class would receive the largest decrease, 2.9 percent.

⁵ This proposal, if accepted, would replace the interim revisions to narrow the differentials between Tiers 3 and 4 and between Tiers 4 and 5 proposed in the February 26, 2010, Application of Pacific Gas and Electric Company for Expedited Authorization to Change Residential Electric Rates Effective June 1, 2010, to Provide Summer 2010 Rate Relief for Households With Upper Tier Consumption, A.10-02-029.

(5) reduction of the baseline quantity for all residential customers, also bringing PG&E's rates more into line with those of other California utilities; and

(6) general increase in customer and demand charges, where supported by cost of service, with a general decrease in energy charges.

PG&E's proposal results in a rate decrease to the residential class that will be allocated to the rates for non-CARE usage in excess of 130 percent of baseline.

PG&E is not proposing to increase Tier 1 or 2 rates for the CARE program in this proceeding. With a minor exception, such rates have not increased since 2001, and on an inflation-adjusted basis have gone down virtually every year since then. However, PG&E is proposing to introduce a Tier 3 rate for CARE customers set at 150 percent of the Tier 1 CARE rate, as now allowed by PUC Section 739.1(b)(5).⁶ This adjustment will increase CARE rates for those CARE customers who have usage above 130 percent of baseline, introducing a conservation incentive that does not exist under the current schedule. In addition, as already noted, PG&E is proposing a \$2.40 per month customer charge for all CARE customers.

**TABLE 1
PACIFIC GAS AND ELECTRIC COMPANY
COMPARISON OF CURRENT AND PROPOSED BUNDLED AVERAGE RATES**

Line No.	Class	(1) Current Rates 2010 (c/kWh)	(2) Full Cost Rates (c/kWh)	(3) Percent Change	(4) Revenue Change (millions)	(5) Proposed Rates(c/k Wh)	(6) Percent Change	(7) Revenue Change (millions)
1	Residential	16.8	16.0	-5.1%	-\$268.9	16.3	-2.9%	-\$151.8
2	Small L&P	18.4	20.0	8.7%	\$154.3	19.3	4.6%	\$81.1
3	Medium L&P	16.5	17.0	3.0%	\$56.1	16.8	1.8%	\$32.9
4	E-19	14.3	14.1	-1.7%	-\$25.6	14.2	-0.5%	-\$8.2
5	Agriculture	14.8	16.6	11.5%	\$82.5	15.7	6.0%	\$43.1
6	E-20	11.8	11.6	-1.9%	-\$29.4	11.8	-0.7%	-\$10.1
7	Streetlights	16.4	20.6	25.2%	\$17.8	17.7	7.5%	\$5.3
8	Standby	12.1	12.2	1.0%	\$0.5	12.2	0.8%	\$0.4
9	Bundled Average	15.7	15.7	-0.1%	-\$12.6	15.7	-0.1%	-\$7.3

Because direct access (DA) and community choice aggregation (CCA) customers also pay rates for distribution and PPP, these customers will be affected by PG&E's proposals. In

⁶ This statutory language was added by Senate Bill 695, enacted October 11, 2009.

addition, departing load customers will be affected by the change to PPP rates to the extent they are required to pay these rates. Table 2 summarizes the impact of PG&E's proposals on DA and CCA customers.

**TABLE 2
PACIFIC GAS AND ELECTRIC COMPANY
COMPARISON OF CURRENT AND PROPOSED DA/CCA AVERAGE RATES**

Line No.	Class	(1) Current Rates 2010 (c/kWh)	(2) Full Cost Rates (c/kWh)	(3) Percent Change	(4) Revenue Change (millions)	(5) Proposed Rates (c/kWh)	(6) Percent Change	(7) Revenue Change (millions)
1	Residential	8.7	6.9	-20.3%	-\$0.6	7.4	-15.0%	-\$0.4
2	Small L&P	9.2	10.7	16.4%	\$0.6	9.8	7.1%	\$0.3
3	Medium L&P	5.9	6.9	16.2%	\$6.8	6.4	7.4%	\$3.1
4	E-19	5.1	5.3	2.5%	\$2.3	5.2	1.0%	\$0.9
5	Agriculture	5.6	5.7	2.4%	\$0.0	5.6	1.2%	\$0.0
6	E-20	3.9	4.1	4.9%	\$5.2	4.0	2.8%	\$3.0
7	DA/CCA Average	4.7	4.9	5.8%	\$14.4	4.8	2.8%	\$6.9

Note: Shown without the effect of Federal Preference Power received by certain non-residential customers

Further, PG&E presents its RTP rate design proposal and associated incremental costs, as directed in D. 08-07-045, OPs 7, 13, 14 and 15. For reasons explained in PG&E's PTM D.08-07-045, PG&E proposes to implement RTP one year following a decision in this case, or by May 1, 2012, whichever is later. D.08-07-045 specified an implementation date of May 1, 2011.

PG&E includes a proposal and costs to proceed with the RCES project, which will include daily electric usage information that may help customers understand how dynamic pricing alternatives, such as Peak Day Pricing (PDP), two-part Peak Time Rebate (PTR) and RTP, could affect the customer's bill and support changes in energy usage during peak periods. The RCES will comply with D.07-07-047, and, pursuant to PUC Section 739(e)(1), will show the cost per kilowatt-hour (kWh) or gas therm per tier plus a visual representation of usage and cost per tier.

III. REGULATORY BACKGROUND AND AUTHORITY FOR PROPOSALS

A. Separate Application For Marginal Costs, Revenue Allocation And Rate Design

In the March 5, 2010, Scoping Memo, p. 7, in PG&E's 2011 Phase 1 proceeding, the Commission directed PG&E to "file a separate Phase 2 application to address electric marginal costs, revenue allocation, and rate design consistent with recent GRC proceedings, including PG&E's test year 2007 GRC filings, and consistent with the Commission's responsibility under PUC Section 1701.5 to complete ratemaking proceedings within 18 months." Therefore, PG&E is filing its 2011 Phase 2 showing as a separate application.

B. Real Time Pricing Rate Design And Cost Recovery

OP 7 of D. 08-07-045 ordered PG&E to file a RTP proposal as follows:

7. PG&E shall propose optional RTP rates for all customer classes as part of its 2011 General Rate Case Phase 2 to be filed on March 1, 2010. The effective date of the proposed rates shall be on or before May 1, 2011.

Although Phase 2 GRC proceedings normally do not involve revenue requirement recovery requests, OPs 13, 14 and 15 of D.08-07-045 authorized PG&E to seek recovery of incremental expenditures required to implement dynamic pricing proposals, as follows:

13. PG&E shall seek recovery of expenditures necessary to implement dynamic pricing incurred in 2011 and later in general rate cases.

14. PG&E shall seek recovery of incremental expenditures required to implement dynamic pricing incurred before 2011 in the application(s) in which PG&E proposes the specific dynamic pricing rates and shall provide the necessary justification.

15. PG&E is authorized to record incremental expenditures required to implement specific dynamic pricing rates in a memorandum account and shall seek recovery of any such expenditures in the related rate design proceeding.

PG&E currently is recording the incremental costs associated with implementing dynamic pricing, including RTP, in its Dynamic Pricing Memorandum Account (DPMA), which the Commission approved in Resolution E-4210, effective September 3, 2008.

C. Customer Energy Statement Revision And Cost Recovery

The Commission has recognized that “PG&E’s customers would benefit from improvements to PG&E’s customer bills, to the extent these improvements lead to clarity and ease of comprehension.”^{2/} To continue meeting the goals of clarity, ease of comprehension, usefulness and relevance in the dynamic pricing environment, PG&E will change the presentation of information included on gas and electric energy statements. Further, the underlying calculation of gas and electric customer bills will change as a result of changes to PUC Section 739(e)(1) enacted in 2008, which lists new requirements for utility energy statements and directs that they be updated through this GRC. PG&E is including energy statement implementation in this Application in compliance with this legislation, consistent with the direction of D. 07-07-047, to include dynamic pricing information, and to improve the usefulness and relevance of the energy statements. PG&E will file an advice letter after a final decision in this proceeding for the Commission’s approval of the RCES format, as directed by the Commission in D. 07-07-047.

PG&E has included in this Application a request for recovery of the costs of RCES, but does not anticipate starting work to implement this project until the Commission issues a decision in this proceeding.

D. Master Metering Experience

Pursuant to COL 2(a) of D. 07-09-004, PG&E and BOMA are to provide information “based on actual commercial building master metering experience to date, to answer the questions specified in Section 6.2.3 of this decision.” PG&E and BOMA are to provide information in response to the 14 questions in Section 6.2.3 for evaluation by the Commission when available. However, BOMA has informed PG&E that BOMA is not aware that any submetering of tenants has occurred in master metered commercial buildings as a result of D.07-09-004. Consequently, no data are available to provide any meaningful response to the 14

^{2/} D. 07-07-047, Finding of Fact 1, page 17.

questions posed by the Commission. PG&E will continue to work cooperatively with BOMA to report on such future activity as appropriate.

IV. OVERVIEW OF PG&E'S PHASE 2 PROPOSALS

A. Marginal Cost

As described in Exhibit (PG&E-2), PG&E's proposed marginal cost approach in this 2011 Phase 2 proceeding is based on the economic theory of marginal cost and the Commission's adopted principles and methods. In addition, PG&E assessed the usefulness of marginal cost results in relevant applications and introduced refinements of marginal cost approaches based on improved data availability and new tariff rules.

1. Generation Marginal Energy And Capacity Costs

PG&E has developed separate marginal energy costs (MEC) and marginal generation capacity costs (MGCC) because using separate MEC and MGCC for allocating costs provides the most appropriate price signals to customers. For capacity costs, PG&E proposes to use a 6-year planning horizon, consistent with the Commission's stated preference for a balance between longer-term and shorter-term perspectives.

2. Transmission Marginal Capacity Costs

PG&E proposes to use the Discounted Total Investment Method (DTIM) for calculating its marginal transmission capacity cost (MTCC), in order better to reflect the lumpiness of investments and the time value of money. The transmission marginal costs proposed in this Application are based on those planned investments that can be avoided or deferred if load growth fails to materialize as expected, i.e., deferrable transmission capacity projects.

3. Distribution Marginal Capacity Costs

PG&E's proposed marginal distribution capacity costs (MDCC) are developed using the DTIM and costs by area because investments during the planning horizon are needed at different times and in different sizes for different areas depending on the installed capacity and load growth unique to each area, as reflected in the distribution expansion planning process. The

DTIM conforms to the Commission's guidance in D. 92-12-057 and Commission-adopted marginal cost principles and is well-suited for computing area-specific marginal costs.

4. Customer Access Marginal Costs

PG&E's proposed marginal customer access costs (MCAC) are based on the one-time hookup cost (OTHC) method first adopted for PG&E in its 1993 GRC (D. 92-12-057). For new customer hookup costs, PG&E retains the previously adopted OTHC methodology but has significantly improved its process for gathering new connection cost data and now includes a forecast of the number of new connections, resulting in more accurate marginal costs. In addition to the one-time capital costs of new access equipment, PG&E's OTHC-based MCAC include ongoing costs such as for access equipment replacement, operation and maintenance (O&M), and customer revenue-cycle services (RCS) such as meter reading, billing, account maintenance, and customer inquiry. PG&E proposes to use data from its RCS models in estimating the customer class-specific marginal costs for revenue cycle and related services with cost adjustments for SmartMeter™ implementation.

B. Revenue Allocation And Rate Design

As described in Exhibit (PG&E-1), Chapter 2, PG&E currently allocates revenue separately for several different components of bundled service rates. Revenue allocation rules and policies for most of these components have been established in other proceedings and are not revisited here. PG&E's proposals in this proceeding are limited to revising or updating methods for setting rates for distribution, generation and PPP.

The Commission has a long history of using Equal Percent of Marginal Cost (EPMC) to allocate revenue among customer classes. PG&E proposes the same general EPMC approach for generation and distribution revenue allocation. PG&E's proposed rate design for generation and distribution also typically uses marginal cost relationships. Because there is no linkage between PG&E's cost to serve an additional kilowatt-hour (or kWh) and the cost of PG&E's public purpose programs, however, PG&E proposes alternative approaches to allocating these costs. In

addition, PG&E proposes a methodology to implement rate changes between GRC Phase 2 proceedings in this proceeding.

1. Distribution And PPP Revenue Allocation And Rate Design

PG&E proposes to allocate distribution revenue based on distribution EPMC reflecting the marginal costs described in Exhibit (PG&E-2). For distribution rate design, PG&E continues to adjust individual components of rates, such as demand and customer charges, based on marginal costs.

PG&E also proposes to continue recovering distribution CARE discounts in the CARE surcharge component of PPP rates based on the methods used today. PG&E proposes to modify the current allocation of one of the non-CARE components of PPP and adds the CARE surcharge component to determine the total rates for PPP.

2. Generation Revenue Allocation And Rate Design

PG&E's generation rates recover the generation revenue allocated to bundled customers to collect generation costs, and includes the costs of owning and operating PG&E's power plants and of qualifying facility (QF) contracts, power purchase agreements (PPAs), bilateral contracts, California Department of Water Resources (CDWR) power charges assigned to bundled customers, and CDWR franchise fees assigned to bundled customers, excluding costs otherwise recovered as Competition Transition Charges (CTC). PG&E proposes to allocate generation costs based on the EPMC methodology using generation marginal capacity and energy costs from Exhibit (PG&E-2), Chapter 2, and to adjust demand and energy based on marginal generation costs.

3. Proposed Rates

PG&E proposes to make further progress toward cost-based rates to provide an equitable, efficient allocation among customer groups. PG&E proposes to revise allocation of current PG&E generation and distribution revenues to move further toward full cost in this proceeding. Specifically, PG&E proposes to move 50 percent of the way from the current allocation of generation and distribution to each class to the allocation that would be assigned under full

EPMC for these functions. This proposal, together with the proposals for changes to individual components of rates, continues the movement of electric rates closer to cost of service while also taking into consideration equity among customers and customer acceptance.

C. REAL TIME PRICING AND COST RECOVERY

PG&E has formulated its RTP tariff proposal and proposed framework for RTP program implementation to meet CPUC directives in D. 08-07-045, while minimizing complexity and bounding potential risks that might arise as the new tariffs are implemented. The RTP rate design guidance provided in Attachment A to D. 08-07-045 included the following directives:

1. RTP should be made available as a new voluntary tariff option for all customer classes beginning no later than May 1, 2011;
2. RTP energy charges should be “indexed” to the California Independent System Operator’s (CAISO’s) day-ahead hourly market prices (which became publicly available to all California market participants starting on April 1, 2009 with implementation of Phase 1 of the CAISO Market Redesign and Technology Upgrade (MRTU) process, referred to herein as “day-ahead hourly ISO prices”);
3. Initial RTP rates should be based on day-ahead hourly ISO prices that are aggregated across PG&E’s whole service territory, with the possibility of eventually adopting location-specific rates deferred for future consideration; and
4. The Commission will make a determination here of “the degree to which the marginal cost of capacity is not incorporated into the CAISO’s day-ahead hourly market prices,” with this determination required so as to decide how to ensure that the RTP tariffs will recover both generation energy and capacity costs.

PG&E’s RTP rate design incorporates these directives, and builds on them as described in Exhibit (PG&E-1), Chapter 9. As noted above, PG&E proposes to implement RTP beginning May 1, 2012 under its proposed case schedule, or 12 months after a final Commission decision on its RTP rate and cost recovery proposals, whichever is later.

PG&E also presents its cost recovery proposal to implement RTP. PG&E proposes the Commission authorize recovery of PG&E’s incremental implementation costs.

D. CUSTOMER ENERGY STATEMENT REVISION AND COST RECOVERY

As described in Exhibit (PG&E-3), Chapter 1, “Policy for Dynamic Pricing and Revised Customer Energy Statement,” PG&E’s revised energy statements must address various regulatory and legislative requirements set forth in D. 07-07-047 and PUC Section 739(e)(1) in addition to the billing implications of new dynamic pricing options.

In June 2006, based on customer survey data, PG&E filed A. 06-06-026 seeking an order to clarify and reorganize the information PG&E must include in energy statements. In July 2007, the Commission issued D. 07-07-047, which specified the types of information PG&E must include in customer bills and provided direction on the formatting for that information. For example, currently PG&E’s electric energy statements include line items for the customer’s electricity cost by functional component (e.g., generation, energy delivery, public purpose programs). D.07-07-047 clarified that this information need not be presented as line items. It also directed, at OP 10, that “PG&E shall file an advice letter for approval of all changes to its bills that go beyond changes that would be considered cosmetic or superficial.”

Section 739(e)(1) lists requirements for utility energy statements. While PG&E’s current energy statement satisfies most of these requirements, it does not satisfy every one. For example, Section 739(e)(1) requires utilities to show the cost per kilowatt-hour (kWh) or gas therm per tier plus a visual representation of usage and cost per tier. PG&E’s current statements do not present the billing calculation in that form. The statute also states, “Each electrical corporation and each gas corporation shall, *in a timeframe consistent with each electrical and gas corporation’s next general rate case,*⁸ disclose on the billing statement of a residential customer all of” the newly required items.

PG&E’s revised energy statements will display graphically daily usage information to assist customers in understanding how their bill is related to their usage. Further, the energy statements will display graphically peak event usage information for customers on PTR and PDP. Because this information is available through SmartMeters™, PG&E proposes to

⁸ Emphasis added.

implement the new energy statement no earlier than the fourth quarter of 2012, after deployment of the new meters is complete.

PG&E also presents its cost recovery proposal to implement the RCES. PG&E proposes to recover the cost to implement the RCES and related forms from gas and electric customers, all of whom will benefit from the changes to the energy statements. PG&E proposes the Commission adopt PG&E's forecast of implementation costs and authorize recovery of that amount in rates.

V. ORGANIZATION OF PG&E'S PHASE 2 FILING

The details of PG&E's marginal cost, revenue allocation, rate design and bill revision proposals are set forth in the prepared testimony that accompanies this Application. PG&E's testimony comprises four exhibits, which are contained in four bound volumes accompanying this Application. These volumes contain Exhibit (PG&E-1) (Revenue Allocation and Rate Design), Exhibit (PG&E-2) (Marginal Cost), Exhibit (PG&E-3) (Dynamic Pricing and Revised Customer Energy Statement), and Exhibit (PG&E-4) (Statements of Qualifications). The testimony is organized as follows.

Exhibit (PG&E-1): Revenue Allocation And Rate Design. This exhibit describes PG&E's proposals for allocating revenues among customer classes and designing the rates for specific customer groups and consists of the following chapters:

Chapter 1 – Revenue Allocation and Rate Design Policy

Chapter 2 – Revenue Allocation Proposal

Chapter 3 – Residential Rates

Chapter 4 – Small Light and Power Rates

Chapter 5 – Medium and Large Light and Power Rates

Chapter 6 – Agricultural Rates

Chapter 7 – Standby Rates

Chapter 8 – Streetlight Rates

Chapter 9 – Dynamic Pricing Rates

Chapter 10 – Tariff Revisions

Chapter 11 – Equity and Efficiency Aspects of PG&E's Residential Rate Design Proposals

Attachment 11A – Various Attachments supporting Equity and Efficiency Aspects of PG&E's Residential Rate Design Proposals

Appendix A – Revenue and Average Rate Summary at Full Cost Rates

Appendix B – Revenue and Average Rate Summary at Proposed Rates

Appendix C – Present and Proposed Rates

Appendix D – Illustrative Bill Impacts of Present Versus Proposed Total Rates

Exhibit (PG&E-2): Marginal Cost. This exhibit describes the principles, methods, and data underlying PG&E's marginal cost proposals and consists of the following chapters:

Chapter 1 – Marginal Costs Proposals

Chapter 2 – Marginal Generation Cost

Chapter 3 – Deferrable Transmission Capacity Projects

Chapter 4 – Transmission Marginal Costs

Chapter 5 – Distribution Expansion Planning Process and Projected Costs

Chapter 6 – Distribution Marginal Cost Calculations and Results

Attachment 6A – Mathematical Formulation of the Discounted Total Investment Method and Alternate Methods to Compute Marginal Distribution Costs

Chapter 7 – Marginal Customer Access Costs

Chapter 8 – Marginal Cost Financial Factors and Loaders

Exhibit (PG&E-3): Dynamic Pricing and Revised Customer Energy Statement. This exhibit describes the estimated incremental costs to implement PG&E's RTP proposal and the forecast costs to implement RCES. It consists of the following chapters:

Chapter 1 – Policy for Dynamic Pricing and Revised Customer Energy Statement

Chapter 2 – Analysis of Incremental Costs

Attachment 2A – Excerpt from Workpapers Supporting Exhibit (PG&E-3), Chapter 2

Chapter 3 – Revised Customer Energy Statement

Chapter 4 – Customer Inquiry Costs

Chapter 5 – Customer Outreach and Education Costs

Chapter 6 – Billing, Revenue and Credit Costs

Chapter 7 – Online Enablement

Chapter 8 – Information Technology Costs

Chapter 9 – Load Impact Study Costs

Chapter 10 – Results of Operations

Chapter 11 – Cost Recovery Proposal

Exhibit (PG&E-4): Statements of Qualifications.

VI. WORKPAPERS

Workpapers supporting PG&E’s testimony will be provided upon request. Requests for workpapers should be directed to: Lauren Rohde, 2011 GRC Phase 2 Case Coordinator, telephone (415) 973-8340, e-mail LDRI@pge.com. PG&E intends to request inclusion of many of the workpapers in the record of this Phase 2 proceeding. Therefore, when PG&E’s witnesses adopt their prepared and rebuttal testimony, they may also sponsor and adopt their workpapers, or portions thereof.

VII. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Service (Rules 1.9 And 1.10)

This Application and the accompanying prepared testimony comply with the requirements of form and process contained in the Commission’s Rules of Practice and Procedure. This Application, including a notice of availability of supporting testimony, is being served by email on all parties on the official service list in PG&E’s 2007 GRC Phase 2 proceeding (A. 06-03-005) and PG&E’s 2011 GRC Phase 1 proceeding (A. 09-12-020). PG&E will provide workpapers not included with supporting testimony to the Division of Ratepayer Advocates promptly and to any other interested parties upon request.

B. Verification (Rules 1.11 And 2.1)

The required verification is attached to this Application.

C. Legal Name And Principal Place Of Business (Rule 2.1(a))

Applicant's legal name is Pacific Gas and Electric Company. Applicant's principal place of business is San Francisco, California. Its mailing address is Post Office Box 7442, San Francisco, California 94120. Since October 10, 1905, Applicant has been an operating public utility corporation organized under the laws of the State of California.

D. Correspondence And Communication (Rule 2.1(b))

PG&E's attorneys in this matter are Shirley A. Woo and Deborah S. Shefler. All correspondence and communication regarding this Application should be addressed to:

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PG&E requests that correspondence and communications regarding this Application also be directed to:

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Pacific Gas and Electric Company
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San Francisco, CA 94105
Email : cpucases@pge.com

E. Proposed Categorization (Rule 2.1(c))

PG&E proposes that this Application be categorized as a rate setting proceeding.

F. Need For Hearing (Rule 2.1(c))

Although formal evidentiary hearings will likely be needed, PG&E intends to explore the possibility of settlement on some or all of the issues raised in this Application.

G. Issues To Be Considered (Rule 2.1(c))

The key issues presented in this proceeding are discussed in Sections II and IV above and set forth in much greater detail in the accompanying prepared testimony. Stated generally, the issues to be considered include:

1. Are PG&E's marginal cost proposals reasonable and should they be adopted?
2. Are PG&E's revenue allocation proposals reasonable and should they be adopted?
3. Are PG&E's rate design proposals reasonable and should they be adopted?
4. Are PG&E's RCES proposals reasonable and should they be adopted?
5. Is PG&E's RTP proposal presented pursuant to D. 08-07-045 reasonable and should it be adopted?
6. Whether to find that PG&E's 2011 – 2013 estimated cost of \$36.1 million to implement the RCES is reasonable.
7. Whether to find that PG&E's 2009 – 2013 estimated incremental cost of up to \$17.0 million to implement the RTP proposal is reasonable.
8. Whether to authorize rate recovery through 2013 of the estimated RCES revenue requirement through the electric Distribution Revenue Adjustment Mechanism (DRAM) and the gas distribution cost sub-account of the Core Fixed Cost Account (CFCA) and the gas interim relief and distribution sub-account of the non-core Customer Class Charge Account (NCA), and recovery of these costs in rates pursuant to the Annual Electric True-up (AET) and the Annual Gas True-up (AGT).
9. Whether to authorize PG&E to transfer actual costs and associated revenue requirements recorded in the DPMA for RTP implementation through December 2013 on a monthly basis to the DRAM for subsequent recovery in rates through PG&E's AET advice letter process, or as soon thereafter as practicable, not subject to after-the-fact reasonableness review, provided the actual costs recorded in the DPMA through December 2013 do not exceed the amount authorized in the Commission's decision on this Application.

H. Proposed Schedule

As discussed above, PG&E hopes to resolve some or all of the issues raised in this Application through settlement. Therefore, PG&E has modified the schedule set forth in the RCP to allow for settlement discussions.

Event	RCP Deadline	Date
Application Filed	March 22, 2010	March 22, 2010
Prehearing Conference	N/A	By May 3, 2010
PG&E updates exhibits	+ 100 days from Phase 2 filing	June 30, 2010
Mandatory Settlement Conference	N/A	By July 16, 2010
Division of Ratepayer Advocates serve testimony	+ 160 days from Phase 2 filing	July 30, 2010 ⁹
Intervenors serve testimony	+ 200 days from Phase 2 filing	September 8, 2010
Mandatory Settlement Conference	N/A	By October 1, 2010
All parties serve rebuttal testimony	+ 239 days from Phase 2 filing	October 18, 2010
Evidentiary hearings begin	N/A ¹⁰	November 8, 2010
Evidentiary hearings end	N/A	November 12, 2010
Opening briefs due	+ 18 days from end of hearings	November 30, 2010

⁹ PG&E requests that rates herein be effective as of May 1, 2011, or, in the case of RTP rates, as of May 1, 2012 (or 12 months after the final Commission decision, whichever is later). As explained in PG&E's Petition to Modify D.08-07-045, to meet these dates, PG&E needs a final Commission decision by April 2011. Thus, PG&E proposes that the RCP schedule be truncated by 30 days, as reflected in the proposed date by which DRA serves its testimony, and in all subsequent dates required by the RCP.

¹⁰ Under the RCP, the Commission is supposed to hold two sets of hearings, one on initial testimony and another on rebuttal testimony, with hearings on rebuttal testimony to be held 10 days after rebuttal testimony is served. However, in past Phase 2 cases, the Commission has held one set of hearings. PG&E's proposed hearing dates are consistent with this past precedent.

Event	RCP Deadline	Date
Reply briefs due	+ 14 days from opening briefs	December 10, 2010
Proposed Decision	N/A	March 7, 2011 Response – March 28 Reply – April 4
Final decision	+ 412 days from Phase 2 application	April 21, 2011
Effective date of rates, excluding RTP	May 1	May 1, 2011
Effective date of RTP ¹¹	N/A	May 1, 2012

I. Articles Of Incorporation (Rule 2.2)

PG&E is, and ever since October 10, 1906, has been an operating public utility corporation, organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. A certified copy of PG&E’s Restated Articles of Incorporation, effective April 12, 2004, was filed with the Commission on May 3, 2004 with PG&E’s Application 04-05-005 and is incorporated herein by reference.

J. Balance Sheet And Income Statement (Rule 3.2(a) (1))

PG&E’s most current balance sheet and an income statement was filed with the Commission in A.10-02-029, and is incorporated by reference.

K. Statement Of Presently-Effective Rates (Rule 3.2(a)(2))

PG&E’s presently-effective rates are contained in Appendix C to Exhibit (PG&E-1).

L. Statement Of Proposed Increases (Rule 3.2(a)(3))

The proposed rates in Appendix C to Exhibit (PG&E-1) do not reflect or pass through to customers any increased costs to PG&E for the services or commodities furnished by it that may be reflected in additional revenue requirement changes that may be adopted prior to a decision in

¹¹ PG&E proposes to implement RTP beginning May 1, 2012 under its proposed case schedule, or 12 months after a final Commission decision on its RTP rate and cost recovery proposals, whichever is later.

this case, or through the decision in this case. The purpose of the marginal cost, revenue allocation and rate design proposals in this Application is to modify electric marginal costs, revenue allocation, and rate design, but not to increase the overall level of PG&E's electric revenues.

However, the revenue requirement associated with the RTP and the RCES will be recovered through the DRAM and PG&E's AET process. Distribution rates covering the request in this Application will be set in the same manner as rates for other distribution revenue based on then current methods for distribution revenue allocation and rate design. The cost will be recovered from all customers who receive transmission and distribution service from PG&E, including bundled, direct access and Community Choice Aggregation customers. As set forth above, rates would be set to recover the 2009 through 2013 cumulative revenue requirement request of \$10.1 million. Electric rates would first be reduced over current rates in January 2012 by \$1.8 million. In 2013, rates would be increased by \$5.5 million over current rates. And in 2014, rates would be increased by \$6.5 million over current rates. The increase of \$6.5 million over current rates is the single largest annual electric rate increase and amounts to an increase to bundled average rates of approximately 0.05 percent. In all instances, the percentage increase in revenue requested in this Application is less than 1 percent relative to current rates.

The revenue requirement allocated to gas rates associated with the RCES will be recovered through the CFCA and NCA and PG&E's AGT process. Distribution rates covering the request in this Application will be set in the same manner as rates for other distribution revenue based on then current methods for distribution revenue allocation and rate design. The cost will be recovered from all gas transportation customers who pay a portion of PG&E's gas distribution revenue requirement. As set forth above, rates would be set to recover the 2011 through 2012 cumulative revenue requirement of \$2.5 million. Rates to collect this amount would initially decline relative to current rates by \$2.3 million in January 2012. In January 2013, rates would be increased by \$4.8 million over current rates. The increase of \$4.8 million over current rates is the single largest annual gas rate increase and amounts to an average gas rate

increase of approximately 0.1 percent. In all instances, the percentage increase in revenue requested in this Application is less than 1 percent relative to current rates.

M. Property And Equipment (Rule 3.2(a)(4))

A description of PG&E's property and equipment, with their original costs and applicable depreciation reserve, was filed with the Commission on December 21, 2009, as part of PG&E's 2011 GRC No. 09-12-020, and is incorporated herein by reference.

N. Summary Of Earnings (Rule 3.2(a)(5) and (6))

A summary of recorded year 2008 revenues, expenses, rate cases and rate of return for PG&E's Electric and Gas Departments was filed with the Commission on December 21, 2009, as part of PG&E's 2011 Phase 1 GRC, A. 09-12-020, and is incorporated herein by reference.

O. Depreciation Method (Rule 3.2(a)(7))

PG&E's statement of the method of computing the depreciation deduction for federal income tax purposes was filed with the Commission on December 21, 2009, as part of PG&E's 2011 Phase 1 GRC, A. 09-12-020, and is incorporated herein by reference.

P. Proxy Statement (Rule 3.2(a)(8))

PG&E's most recent proxy statement dated April 1, 2009 was filed with the Commission in A.09-05-016 on May 18, 2009. This proxy statement is incorporated herein by reference.

Q. Type Of Rate Change Requested (Rule 3.2(a) (10))

The rate changes sought in this Application reflect and pass through to customers increased costs to the corporation for the services furnished by it.

R. Service And Notice Of Application (Rule 3.2(b)-(d))

PG&E is serving this Application and attachments, or a Notice of Availability of this Application and attachments, on all parties on the official service lists in its 2007 GRC Phase 2 proceeding (A.06-03-005) and 2011 GRC Phase 1 proceeding (A.09-12-020). Within ten days after filing this Application, PG&E will mail or send electronically a notice stating in general terms the proposed revenues, rate changes and ratemaking mechanisms requested in this Application to the entities on the list filed with the Commission on December 21, 2009, as part

of PG&E's 2011 GRC, A. 09-12-020. Within ten days PG&E will also publish a notice of the filing of this Application and of proposed changes in rates in a newspaper of general circulation in each county in its service territory. Within 45 days after filing this Application, PG&E will furnish a notice of the proposed changes in rates with the regular bills mailed to PG&E's customers.

VIII. CONCLUSION

PG&E is ready to proceed with its showing as of the date of this filing. For the reasons stated above and supported in the prepared testimony, PG&E respectfully requests that the Commission issue a decision herein by April 2011 that will:

1. Approve PG&E's electric marginal costs, revenue allocation, and rate design;
2. Approve PG&E's RTP proposal presented in compliance with D. 08-07-045;
3. Find that PG&E's estimated incremental cost of \$17.0 million to implement the RTP proposal is reasonable and prudent;
4. Authorize PG&E to transfer incremental amounts to implement RTP that are recorded in the DPMA through December 2013 on a monthly basis to the DRAM for subsequent recovery in rates through PG&E's AET advice letter process, or as soon thereafter as practicable, not subject to after-the-fact review, provided the actual costs recorded in the DPMA through December 2013 do not exceed the amount forecast in this Application;
5. Approve PG&E's RCES proposal;
6. Adopt PG&E's forecast cost of \$36.1 million to implement the RCES proposal;
7. Authorize rate recovery of RCES costs and associated revenue requirements estimated through 2013 pursuant to the AET and the AGT; and
8. Grant such further relief as may be just and reasonable.

Respectfully submitted,

JANE K. YURA
VICE PRESIDENT, STATE REGULATION

By: _____ /s/
JANE K. YURA

SHIRLEY A. WOO
DEBORAH S. SHEFLER

By: _____ /s/
DEBORAH S. SHEFLER

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Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: March 22, 2010

VERIFICATION

I, the undersigned, say:

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized to make this verification for that reason. I have read the foregoing APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY TO REVISE ITS ELECTRIC MARGINAL COSTS, REVENUE ALLOCATION, AND RATE DESIGN, INCLUDING REAL TIME PRICING, TO REVISE ITS CUSTOMER ENERGY STATEMENTS, AND TO SEEK RECOVERY OF INCREMENTAL EXPENDITURES, and I am informed and believe that the matters therein are true and on the ground allege that the matters stated therein are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at San Francisco, California, this 22nd day of March, 2010.

/s/

JANE K. YURA
Vice President, State Regulation
PACIFIC GAS AND ELECTRIC COMPANY

**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, including Real Time Pricing, to Revise its Customer Energy Statements, and to Seek Recovery of Incremental Expenditures.

Application No. 10-03-_____

U 39 M

**NOTICE OF AVAILABILITY OF PACIFIC GAS AND ELECTRIC COMPANY'S
GENERAL RATE CASE PHASE 2 APPLICATION AND TESTIMONY**

SHIRLEY A. WOO
DEBORAH S. SHEFLER

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Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: March 22, 2010

**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, Including Real Time Pricing, to Revise its Customer Energy Statements, and to Seek Recovery of Incremental Expenditures.

U 39 M

Application No. 10-03-_____

**NOTICE OF AVAILABILITY OF PACIFIC GAS AND ELECTRIC COMPANY'S
GENERAL RATE CASE PHASE 2 APPLICATION AND TESTIMONY**

PACIFIC GAS AND ELECTRIC COMPANY (PG&E) hereby provides this Notice of Availability of its General Rate Case (GRC) Phase 2 Application and Testimony. On March 22, 2010, PG&E filed its GRC Phase 2 Application by transmitting an electronic version to the California Public Utilities Commission's (CPUC) Docket Office. The GRC Phase 2 Application proposes to revise PG&E's electric marginal costs, revenue allocation, and rate design; requests authorization to implement Real Time Pricing (RTP) for its customers and to recover the associated incremental costs, pursuant to Ordering Paragraphs (OP) 7 and 14 of Decision (D.) 08-07-045; and requests authorization to implement a revised customer energy statement and adoption of the associated cost forecast that is outside of the costs forecast in PG&E's 2011 Phase 1 GRC, A.09-12-020, pursuant to D.05-11-009, D.07-07-047, and Public Utilities Code section 739(e)(1).

Materials related to the Application include separately bound prepared testimony and workpapers. Pursuant to Rule 1.9(c), the testimony and workpapers are available upon request. Requests should be submitted in writing by e-mail to: Lauren Rohde, Case Coordinator, Pacific Gas and Electric Company, E-mail: LDRi@pge.com, Telephone: (415) 973-8340. Written requests may also be submitted to PG&E by mail to Ms. Rohde at P.O. Box 770000, Mail Code B9A, San Francisco, California 94177.

The application and testimony will also be made available on the internet at the following link:

<http://apps.pge.com/regulation/SearchResults.aspx?NewSearch=True&CaseID=921&DocType=&PartyID=9999&fromDate=MM%2FDD%2FY&toDate=MM%2FDD%2FY&sortOrder=FileName¤tPage=1&recordsPerPage=100&searchDocuments=Search>

Click on the Search button to access a list of posted documents. Questions concerning internet access should be directed to Ms. Rohde.

Respectfully submitted,

SHIRLEY A. WOO
DEBORAH S. SHEFLER

By. _____ /s/
DEBORAH S. SHEFLER

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Dated: March 22, 2010

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

CERTIFICATE OF SERVICE BY 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 B30A, 77 Beale Street, San Francisco, CA 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On the 22nd of March, 2010, I served a true copy of:

**APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY
TO REVISE ITS ELECTRIC MARGINAL COSTS,
REVENUE ALLOCATION AND RATE DESIGN, INCLUDING REAL TIME
PRICING, TO REVISE ITS CUSTOMER ENERGY STATEMENTS, AND TO SEEK
RECOVERY OF INCREMENTAL EXPENDITURES; AND
NOTICE OF AVAILABILITY OF PACIFIC GAS AND ELECTRIC COMPANY'S
GENERAL RATE CASE PHASE 2 APPLICATION AND TESTIMONY**

by electronic service to the e-mail addresses for:

The parties listed on the official service lists for A. 06-03-005 and A. 09-12-020.

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 this 22nd day of March, 2010, at San Francisco, California.

/s/

TAUVELA U'U

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
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