

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



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Application of Pacific Gas and Electric  
Company (U 39 E) for Approval of its 2012  
Rate Design Window Proposals

Application 12-02-020  
(Filed February 29, 2012)

**MOTION TO AMEND TESTIMONY  
OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

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Dated: April 11, 2012

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Pursuant to Rule 1.12 the Rules of Practice and Procedure (Rules) of the California Public Utilities Commission (the “Commission”), Pacific Gas and Electric Company (“PG&E”) hereby requests permission to amend its testimony in Application No. 12-02-020 (PG&E’s 2012 Rate Design Window (RDW)). Under Rule 1.12(a): “An amendment is a document that makes a substantive change to a previously filed document. An amendment to an application must be filed prior to issuance of the scoping memo.” No scoping memo has been issued yet in this proceeding.

Upon reviewing its testimony after the application was file, PG&E discovered the following inadvertent, minor substantive error: The data underlying Figure 1-2 at page 1-15 had not been corrected to reflect the 2011 GRC Phase 2 Settlement, and a replacement version of Figure 1-2 reflecting that settlement, adopted in D. 11-12-053, is included in the Amended Testimony. The figure still looks significantly the same, although the slope of the increases between now and 2022 is slightly less steep. The revised Figure 1-2 is attached as Attachment 1 hereto.

PG&E also discovered the following inadvertent, minor substantive errors: The data underlying Table 2-4 at page 2-7 had also not been corrected to reflect the 2011



PACIFIC GAS AND ELECTRIC COMPANY  
A.12-02-020 2012 RATE DESIGN WINDOW  
ERRATA TO CHAPTERS 1 AND 2

PG&E is making the following minor substantive corrections to its 2012 Rate Design Window (RDW) Proceeding testimony:

- 1) Correcting the graph in Figure 1-2 on page 1-15 and, accordingly, modifying descriptive text on lines 13 and 14 on page 1-14; and
- 2) Correcting Table 2-4 on page 2-7.
- 3) Correcting the title of the table in Chapter 2, Attachment C on page 2, to read "EL-1" instead of "E-1"

Both Figure 1-2 and Table 2-4 are based upon a PG&E rate forecast developed using revenue requirement and sales forecasts submitted by PG&E to the California Energy Commission (CEC) in June 2011 as part of the CEC's Integrated Energy Policy Report. Since filing its 2012 RDW on February 29, 2012, PG&E has updated its forecast model to incorporate two changes resulting from the revenue allocation settlement adopted in D.11-12-053 (Phase 2 of PG&E's 2011 General Rate Case). First, that settlement resulted in modified allocations of functional revenue requirements to the residential class. Second, the settlement altered the way the CARE shortfall is allocated to the residential and other customer classes. Both these changes affect the amount of the residential revenue requirement that must be borne by upper-tier (i.e., Tier 3 and 4) non-CARE sales, and thus the forecasted upper-tier rate levels. Finally, PG&E updated its model so that the lower-tier non-CARE rate forecasts were derived by applying a forecast of the consumer price index to actual Tier 1 and 2 rates effective March 1, 2012.

In Figure 1-2, these changes have the effect of slightly reducing the upper-tier rate levels in 2022 (from the levels shown in the originally filed Figure 1-2) by 1.7 cents per kWh.

In Table 2-4, the change in the residential revenue allocation lowers the residential share of RPS costs, as shown in both the Residential RPS Share column and Cumulative Class Average Rate Increase column. However, there is an 18 percent increase in the rate impacts shown in the Cumulative Tier 3/4 Rate Increase column because these rate increases previously were mistakenly calculated using *total* residential Tier 3 and Tier 4 sales rather than the smaller *non-CARE* Tier 3 and Tier 4 sales. This underestimated the Cumulative Rate Impact in the original filing.

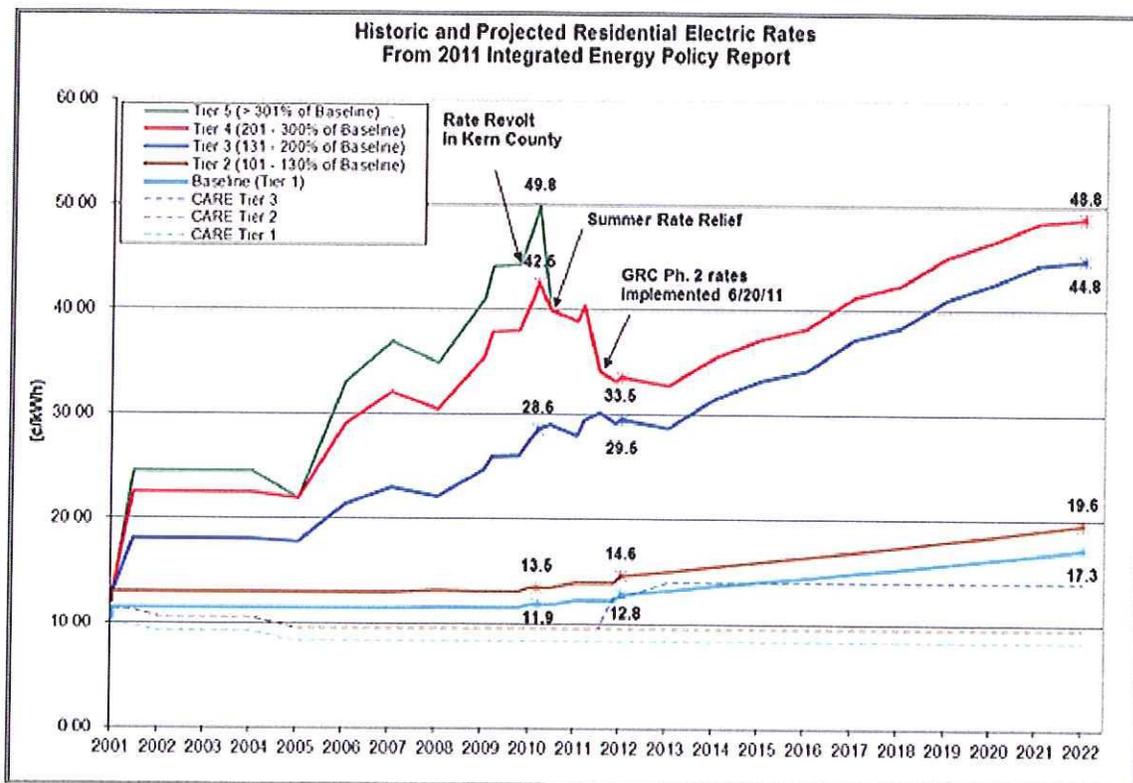
In Attachment C to Chapter 2, the table labeled: Comparison Between 03/01/2012 55% BQ Rates and 03/01/2012 50% BQ Rates- RES Full-Service E1 on page 2, incorrectly refers to schedule E1 instead of Schedule EL-1. The revision is to change the heading to refer to EL-1 instead of E1. No other changes are made to this table.

Changes:

- Substitute new Figure 1-2
- Page 1-14, line 13: Change "65" to "54"

- Page 1-14, line 14: Change “31.1 cents in 2022 (50.5 vs. 19.4 cents per kWh)” to “29.2 cents in 2022 (48.8 vs. 19.6 cents per kWh)”
- Substitute new Table 2-4.
- Attachment C: table labeled: Comparison Between 03/01/2012 55% BQ Rates and 03/01/2012 50% BQ Rates- RES Full-Service E1 on page 2. Revising the title to refer to EL-1 instead of E1. No data is being revised, just the title.

**FIGURE 1-2 ERRATA  
PACIFIC GAS AND ELECTRIC COMPANY  
HISTORIC AND PROJECTED RESIDENTIAL ELECTRIC RATES FROM 2011 INTEGRATED ENERGY  
POLICY REPORT**



**TABLE 2-4 ERRATA  
PACIFIC GAS AND ELECTRIC COMPANY  
CUMULATIVE IMPACTS OF 33 PERCENT RPS ON NON-CARE RESIDENTIAL RATES**

Line No.	Year	RPS Premium(a) (1000s)	Residential RPS Share(b) (1000s)	Cumulative Class Average Rate Increase	Cumulative Tier 3/4 Rate Increase
1	2013	\$651,000	\$216,000	\$0.007	\$0.033
2	2014	\$784,000	\$260,000	\$0.008	\$0.039
3	2015	\$1,159,000	\$385,000	\$0.011	\$0.057
4	2016	\$1,296,000	\$430,000	\$0.013	\$0.063
5	2017	\$1,429,000	\$475,000	\$0.014	\$0.068
6	2018	\$1,410,000	\$468,000	\$0.013	\$0.066
7	2019	\$1,569,000	\$521,000	\$0.014	\$0.072
8	2020	\$1,462,000	\$485,000	\$0.013	\$0.066

- (a) PG&E's share of RPS costs exceeding the cost of natural gas based generation. (Revised Joint Proposal and Supplemental Information filed in Greenhouse Gas Emissions proceeding (R.11-03-012, January 6, 2012, Appendix C-1.) PG&E's share is based on its 44.6 percent share of total investor-owned utility (IOU) sales shown in the Rate Impact Model filed jointly on September 27, 2011.
- (b) Residential share of PG&E's generation costs is 41.89 percent.

PACIFIC GAS AND ELECTRIC COMPANY  
 2012 RATE DESIGN WINDOW  
 ATTACHMENT C ERRATA

RATE DATA ANALYSIS: DR4689 - Rate Design Window 2012

**Comparison Between 03/01/2012 55% BQ Rates and 03/01/2012 50% BQ Rates**

(JAN 09 - DEC 09)

**RES Full Service EL-1**

Percent of Population	\$ Diff	-8 to -10% decrease	-6 to -8% decrease	-4 to -6% decrease	-2 to -4% decrease	-0.01 to -2% decrease	No Change	0.01 - 2% increase	2 to 4% increase	4 to 6% increase	6 to 8% increase	8 to 10% increase
4%	\$0.00	-	-	-	-	-	150,821	-	-	-	-	-
8%	\$0.00	-	-	-	-	-	-	-	-	-	-	-
16%	\$0.00	-	-	-	-	-	2,172	2,327	-	-	-	-
20%	\$0.05	-	-	-	-	-	34	38,679	-	-	-	-
24%	\$0.12	-	-	-	-	-	-	38,801	-	-	-	-
28%	\$0.22	-	-	-	-	-	-	38,781	25	-	-	-
32%	\$0.34	-	-	-	-	-	-	38,661	144	-	-	-
36%	\$0.48	-	-	-	-	-	-	37,395	1,410	-	-	-
40%	\$0.63	-	-	-	-	-	-	30,475	8,332	-	-	-
44%	\$0.79	-	-	-	-	-	-	18,763	20,044	-	-	-
48%	\$0.95	-	-	-	-	-	-	8,634	30,169	-	-	-
52%	\$1.11	-	-	-	-	-	-	5,736	33,065	5	-	-
56%	\$1.26	-	-	-	-	-	-	4,512	33,906	387	-	-
60%	\$1.37	-	-	-	-	-	-	4,891	32,864	1,054	-	-
64%	\$1.38	-	-	-	-	-	-	11,793	26,825	189	-	-
68%	\$1.56	-	-	-	-	-	-	5,318	33,445	39	-	-
72%	\$1.74	-	-	-	-	-	-	3,640	34,314	851	-	-
76%	\$1.84	-	-	-	-	-	-	6,682	31,103	1,069	-	-
80%	\$1.85	-	-	-	-	-	-	10,984	27,522	254	-	-
84%	\$2.08	-	-	-	-	-	-	4,078	34,340	396	-	-
88%	\$2.22	-	-	-	-	-	-	5,602	32,856	344	-	-
92%	\$2.31	-	-	-	-	-	-	11,505	27,064	229	-	-
96%	\$2.43	-	-	-	-	-	-	13,434	25,059	313	-	-
100%	\$5.50	-	-	-	-	-	-	13,212	24,638	955	-	-
Number of Customers							153,027	353,903	457,125	6,085		
Percentage		0.00%	0.00%	0.00%	0.00%	0.00%	15.80%	36.50%	47.10%	0.60%	0.00%	0.00%
CUMULATIVE Customers							153,027	506,930	964,055	970,140	970,140	970,140
Cumulative Percentage		0.00%	0.00%	0.00%	0.00%	0.00%	15.80%	52.30%	99.40%	100.00%	100.00%	100.00%
Monthly Bill Difference in \$		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.76	\$1.63	\$1.87	\$0.00	\$0.00

A PERCENTAGE DIFFERENCE WHICH FALLS ON A COLUMN BOUNDARY IS INCLUDED IN THE HIGHER COLUMN