



**FILED**

01/28/19  
04:59 PM

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

Petition of the Direct Access Customer Coalition  
to Adopt, Amend, or Repeal a Regulation  
Pursuant to Pub. Util. Code § 1708.5.

Petition 18-09-001  
(Filed September 4, 2018)

**REPLY OF PACIFIC GAS AND ELECTRIC COMPANY (U 39-E) TO THE  
RESPONSE OF THE DIRECT ACCESS CUSTOMER COALITION TO  
ADMINISTRATIVE LAW JUDGE'S DECEMBER 13, 2018 RULING**

STACY W. WALTER

Pacific Gas and Electric Company

77 Beale Street, B30A

San Francisco, CA 94105

Telephone: (415) 973-6611

Facsimile: (415) 973-0516

E-Mail: [Stacy.Walter@pge.com](mailto:Stacy.Walter@pge.com)

Attorney for

PACIFIC GAS AND ELECTRIC COMPANY

Dated: January 28, 2019

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

Petition of the Direct Access Customer Coalition  
to Adopt, Amend, or Repeal a Regulation  
Pursuant to Pub. Util. Code § 1708.5.

Petition 18-09-001  
(Filed September 4, 2018)

**REPLY OF PACIFIC GAS AND ELECTRIC COMPANY (U 39-E) TO THE  
RESPONSE OF THE DIRECT ACCESS CUSTOMER COALITION TO  
ADMINISTRATIVE LAW JUDGE’S DECEMBER 13, 2018 RULING**

**I. INTRODUCTION**

Pacific Gas and Electric Company (PG&E) submits this filing in compliance with the Administrative Law Judge’s Ruling Directing the Parties to File Additional Information dated December 13, 2018 (ALJ Ruling). Per ALJ Powell’s subsequent December 18, 2018 email ruling, a two-week extension was granted for responses, making this reply filing timely.

**II. DISCUSSION**

The Direct Access Customer Coalition (DACC) submitted a response on January 17, 2019 to the ALJ Ruling laying out the history of the Direct Access Customer Relocation Declaration form (Declaration). As part of that filing DACC included a copy of PG&E’s December 2017 version of the Declaration. PG&E’s Declaration (Form 79-1014) was modified slightly in 2018 as part of a clean-up Advice Letter submitted by PG&E in August of 2018 and

approved by Energy Division Director Edward Randolph on October 19, 2018.<sup>1</sup> The changes did not revise any of the provisions specifically governing relocations, but for completeness sake PG&E is providing a copy of its currently approved form in Attachment A.

### III. CONCLUSION

PG&E appreciates the opportunity to provide this reply.

Respectfully Submitted,

STACY W. WALTER

By: /s/ Stacy W. Walter  
STACY W. WALTER

Pacific Gas and Electric Company  
77 Beale Street, B30A  
San Francisco, CA 94105  
Telephone: (415) 973-6611  
Facsimile: (415) 973-0516  
E-Mail: [Stacy.Walter@pge.com](mailto:Stacy.Walter@pge.com)

Attorney for  
PACIFIC GAS AND ELECTRIC COMPANY

Dated: January 28, 2019

---

<sup>1</sup> PG&E Advice Letter 4002-G/5349-E submitted to the CPUC Energy Division on August 3, 2018. To conform with the requirements of General Order 96-B language was added to Form 79-1014 providing that "This form at all times shall be subject to such modifications as the California Public Utilities Commission may direct from time to time in the exercise of its jurisdiction".

## **ATTACHMENT A**



## **DIRECT ACCESS CUSTOMER RELOCATION DECLARATION\***

### **A. Electric Service Provider (ESP) Declaration**

I, \_\_\_\_\_, state as follows:

1. I am an authorized representative of \_\_\_\_\_ (Name of ESP) ("ESP") authorized to make this declaration. I have personal knowledge of the matters set forth herein and if called upon as a witness could and would testify competently thereto.
2. Pursuant to a valid agreement (Agreement) by and between \_\_\_\_\_ (Name of ESP) and \_\_\_\_\_ (Name of Customer) ("Customer"), ESP provides electric power service to Customer at the Current Location, as specified below.
3. As stated herein, Customer requests to transfer its direct access (DA) service provided by PG&E and electric power service provided by ESP at the Current Location, to the New Location, as specified in this document. This relocation is requested in the normal course of business.
4. Under the provisions of the Agreement, the Customer has the right to receive electric power service from ESP for electric service loads located at the New Location.
5. All conditions of the Agreement necessary for a transfer of electric service from Current Location to New Location have been satisfied, including any necessary approvals by ESP.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at

\_\_\_\_\_, \_\_\_\_\_  
(City) (State)

Signature: \_\_\_\_\_  
Authorized Representative of ESP

: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

\* This form at all times shall be subject to such modifications as the California Public Utilities Commission may direct from time to time in the exercise of its jurisdiction



## **DIRECT ACCESS CUSTOMER RELOCATION DECLARATION**

### **B. Customer Declaration**

I, \_\_\_\_\_, state as follows:

1. I am an authorized representative of \_\_\_\_\_  
("Customer") and I am authorized to make this declaration.
2. I have personal knowledge of the matters set forth herein and if called upon as a witness could and would testify competently thereto.
3. Customer has entered into an agreement for direct access service (Agreement) with the ESP as identified above.
4. Customer requests to transfer its DA service provided by PG&E and its electric power service provided by ESP from Current Location to New Location, as noted on Attachment 1. This relocation is requested in the normal course of business.

Please check one:

- \_\_\_\_\_ A. "Current Location" means one existing customer Premises<sup>1</sup> where the electric load of one service account (which may consist of one or more electric meters) is currently being served under DA. "New Location" means the same or different Premises from the Current Location which has been newly acquired or constructed by customer, at which the customer intends to relocate all or part of its business and operations from the Current Location. The New Location may only consist of one service account.
- \_\_\_\_\_ B. "Current Location" means one existing customer Premises where the electric load of one or more service accounts are currently being served under DA. "New Location" means the same or different Premises from the Current Location which has been newly acquired or constructed by customer, at which the customer intends to relocate all or part of its business and operations from the Current Location. The New Location may consist of one or more service accounts at a single Premises.
- \_\_\_\_\_ C. "Current Location" means one or more existing customer Premises where the electric load of one or more service accounts is currently being served under DA. "New Location" means a different Premises from the Current Location to which the customer intends to relocate all or part of its business and operations from the Current Location. The New Location may consist of one or more service accounts at a single or multiple Premises. Customer warrants that the total DA load of all active accounts at New Location after the relocation has been completed is limited to loads the same as, or substantially the same as, the loads represented by the Current Location. .

---

<sup>1</sup> Premises is defined in PG&E's electric Rule 1  
Automated Document, Preliminary Statement, Part A.



## **DIRECT ACCESS CUSTOMER RELOCATION DECLARATION**

- \_\_\_\_\_ D. "Current Location" means one or more existing customer Premises where the electric load of one or more service accounts is currently being served under DA. "New Location" means a different Premises than the Current Location to which the customer intends to relocate all or part of its business and operations from the Current Location. The New Location may only consist of one service account at which the customer has been receiving bundled service. The New Location shall not be eligible for DA service until all electric service accounts billing under the same customer of record at the Current Location have been terminated. Customer must submit this request to PG&E no later than ninety (90) days from the date all the service accounts at the Current Location have been terminated.
5. Customer understands that a New Location cannot include bundled service accounts that have been in the customer's name for more than ninety (90) days. This section is not applicable if Section 4.D. above is selected.
6. Customer warrants its total DA load as a result of the relocation does not exceed the load limitations provided in the Agreement.
7. Customer agrees to maintain, and make available to the California Public Utilities Commission (CPUC) upon request, all records associated with its electricity service and consumption at Current Location and New Location, including, but not limited to, the applicable meter and account numbers, and the associated direct access load.
8. Customer agrees to (Check One):
- \_\_\_\_\_ Close its service account(s) at Current Location on \_\_\_\_\_  
[Expected date].
- \_\_\_\_\_ Return its service account(s) at Current Location(s) to bundled service on \_\_\_\_\_  
[Expected date].
- \_\_\_\_\_ Split the load on the service account(s) at Current Location as follows. (this section is only applicable if section 4.C above is selected). Identify service account(s) by PG&E Service Agreement Number in the space below.):
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
9. Customer understands that this declaration must be submitted within sixty (60) days of closing its service account at the Current Location or moving part of its business or operations from the Current Location to a New Location.
10. Customer understands that a DASR must be submitted within sixty (60) days of either a) this relocation declaration's acceptance by PG&E or b) establishment of electric service at the New Location, whichever is later, for this relocation to be valid.



## **DIRECT ACCESS CUSTOMER RELOCATION DECLARATION**

11. Customer understands that continuous direct access status pursuant to Ordering Paragraph 4 of CPUC Decision 02-11;022 (exemption from paying the DWR components of the DA Cost Responsibility Surcharge) will transfer to a relocation account only if each service account at the Current Location(s) being combined for the relocation service account qualifies as continuous direct access. If the customer elects to combine a number of service accounts that do not qualify as continuous direct access, then the relocation service account will not qualify as continuous direct access.
12. Customer understands that the Current Location and New Location must be under the same ownership or must be wholly-owned subsidiaries of the same parent corporation. Under Option 4.D, above, a Customer may request to assign DA eligibility and transfer its DA service between wholly-owned subsidiaries with different Federal Taxpayer Identification Numbers, as specified below, by completing the Affidavit in Attachment 2 and submitting it with this request.

I declare under penalty of perjury under the laws of the State Of California that the foregoing is true and correct. Executed this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_, \_\_\_\_\_ [City, State]

Signature: \_\_\_\_\_  
Authorized Representative of New Customer

Print Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_





**DIRECT ACCESS CUSTOMER  
RELOCATION DECLARATION  
— ATTACHMENT 1 —**

**Name On Account:** \_\_\_\_\_

**Current Location Information (Service Account(s) listed by PG&E Service Agreement Number):**

Service Agreement Number: \_\_\_\_\_  
Service Address: \_\_\_\_\_  
City, State, ZIP: \_\_\_\_\_  
Meter Number: \_\_\_\_\_

Service Agreement Number: \_\_\_\_\_  
Service Address: \_\_\_\_\_  
City, State, ZIP: \_\_\_\_\_  
Meter Number: \_\_\_\_\_

Service Agreement Number: \_\_\_\_\_  
Service Address: \_\_\_\_\_  
City, State, ZIP: \_\_\_\_\_  
Meter Number: \_\_\_\_\_

**New Location Information (Service Account(s) listed by PG&E Service Agreement Number):**

(The direct access service will occur at the New Location and, if only part of its business or operations is relocated, the Current Location may also continue to receive direct access service)

Service Agreement Number: \_\_\_\_\_  
Service Address: \_\_\_\_\_  
City, State, ZIP: \_\_\_\_\_  
Meter Number: \_\_\_\_\_

Service Agreement Number: \_\_\_\_\_  
Service Address: \_\_\_\_\_  
City, State, ZIP: \_\_\_\_\_  
Meter Number: \_\_\_\_\_

Service Agreement Number: \_\_\_\_\_  
Service Address: \_\_\_\_\_  
City, State, ZIP: \_\_\_\_\_  
Meter Number: \_\_\_\_\_

(For more service accounts, please list the additional service accounts on a separate sheet and attach it to this form.)

**Upon receipt by PG&E of the customer relocation declaration, PG&E shall review the information and notify ESP within five (5) business days either that (a) the relocation declaration has been accepted; or (b) PG&E has reasonable cause not to process the customer relocation declaration. Upon receiving notification of the relocation declaration's acceptance under subsection (a) above, ESP must submit a DASR to PG&E within sixty (60) days of either a) this relocation declaration's acceptance by PG&E or b) establishment of electric service at the New Location, whichever is later. Upon receiving denial notification from PG&E under subsection (b) above, PG&E and ESP shall confer as soon as possible to determine what additional information is required in order for the relocation declaration to be accepted. This document may be executed in counterparts and submitted by email or fax, however PG&E reserves the right to request the original signature documents if needed.**



## DIRECT ACCESS CUSTOMER RELOCATION DECLARATION — ATTACHMENT 2 —

### CUSTOMER AFFIDAVIT

(To be completed each time a Direct Access Customer Relocation Declaration includes New Location(s) of wholly-owned subsidiaries of Customer with different Federal Taxpayer Identification Numbers under Option 4.D.)

I, \_\_\_\_\_, state as follows:

1. I am an authorized representative of \_\_\_\_\_  
("Customer") and I am authorized to make this declaration.
2. I have personal knowledge of the matters set forth herein and if called upon as a witness could and would testify competently thereto.
3. Customer attests that the following entities are wholly-owned subsidiaries of Customer and have different Federal Taxpayer Identification Numbers (FTIN), but should be treated as a single entity for the purpose of transferring eligibility for Direct Access (DA) service and electric power service from its Current Location to a New Location in the normal course of business.

Legal Name Of Business	FTIN	Acquisition Date
1.		
2.		
3.		
4.		
5.		

(Please list the additional wholly-owned subsidiaries on a separate sheet and attach it to this form.)

4. Customer understands that PG&E reserves the right to review the information being provided and may request additional documentation of ownership from Customer. If PG&E determines that the listed entities are not all wholly-owned by Customer at the time of the relocation request, PG&E may not process the customer relocation declaration or may rescind the assignment of DA eligibility and the associated relocation(s).

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

Executed this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at  
\_\_\_\_\_, \_\_\_\_\_ [City, State]

Signature: \_\_\_\_\_  
Authorized Representative of New Customer

Print Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_