

From: Blumer, Werner M.
Sent: 4/20/2010 2:20:06 PM
To: Darrah.Morgan@sce.com (Darrah.Morgan@sce.com)
Cc: case.admin@sce.com (case.admin@sce.com); Hughes, John (Reg Rel) (/O=PG&E/OU=Corporate/cn=Recipients/cn=J8HS); Redacted
Redacted Schumacher, Brian D.
(brian.schumacher@cpuc.ca.gov); Redacted
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mcaulson@semprautilities.com (mcaulson@semprautilities.com);
mcaulson@semprautilities.com (mcaulson@semprautilities.com);
lisa.ornelas@sce.com (lisa.ornelas@sce.com); Lisa.Vellanoweth@sce.com
(Lisa.Vellanoweth@sce.com); Loring.Fiske-phillips@sce.com (Loring.Fiske-phillips@sce.com)

Bcc:

Subject: RE: DATA REQUEST:Revision of Rules 15 and 16 and SCE AL 2453-E

Dara,

Looking at this definition again I have second thoughts about the word "permanent". It may result in the utilities requesting deficiency payments from exactly the Applicants they want to consider "permanent" customers which do not have to pay, when knowing they are not going to be the ultimate customers. What do you think?

Thanks,

Werner

From: Darrah.Morgan@sce.com
[mailto:Darrah.Morgan@sce.com]
Sent: Friday, April 16, 2010 6:32 PM
To: Blumer, Werner M.
Cc: Schumacher, Brian D.; Case.Admin@sce.com; Redacted Hughes, John (Reg Rel); Lisa.Ornelas@sce.com; Lisa.Vellanoweth@sce.com; Loring.Fiske-phillips@sce.com;

MCaulson@semprautilities.com [Redacted] [Redacted]
MCaulson@semprautilities.com
Subject: Re: DATA REQUEST:Revision of
Rules 15 and 16 and SCE AL 2453-E

Werner, regarding the proposed "Applicant" definition, the three IOUs agree to the following language for Rules 15 and 16. SCE will be providing substitute sheets to Advice 2453-E to accommodate this change.

Applicant: A person, residential or nonresidential developer, or agency requesting utility to supply permanent electric service.

Regarding what type of "agency" is being referred to in the definition above - I understand SDG&E considers an "agency" to be a governmental, redevelopment, or non-profit agency, similar to what you had mentioned when we last spoke. SCE and PG&E do not have any specific insight on the historical meaning or what type of agency is meant exactly by this wording.

Thank you.

Dara Morgan
SCE - Regulatory Policy &
Affairs
Pax 22086 / 626 302-2086
Fax 21626 / 626
302-1626
Darah.Morgan@sce.com

From: "Blumer, Werner M." <werner.blumer@cpuc.ca.gov>
To: <Darah.Morgan@sce.com>, <Case.Admin@sce.com>
Cc: "Schumacher, Brian D." <brian.schumacher@cpuc.ca.gov>
Date: 04/13/2010 09:10 AM
Subject: DATA REQUEST:Revision of Rules 15 and 16 and SCE AL 2453-E

Dara,

Thank you very much for this info. I do not know what impact if any this has on the wording of the Applicant definition and treatment of developers though, if any.

As to

implication of considering developers as permanent customers, thus avoiding a time limit to receive service after SCE is ready to serve, I wonder how much rate impact that may have. SCE would not collect deficiency payments and that would have to be made up by the ratepayers. Any estimate on that and should that be shown on cover page of an AL supplement for the revised definition ?

Thank you
very much for the insightful conversation yesterday and I am expecting a proposed revised Applicant definition accordingly and agreed upon by the 3 major IOUs.

Werner

From: Darrah.Morgan@sce.com [<mailto:Darrah.Morgan@sce.com>]
Sent: Monday, April 12, 2010 12:17 PM
To: Blumer, Werner
M.
Subject: RE: DATA REQUEST: Compliance with R. 92-03-050
standardization of Rules 15 and 16 and SCE AL 2453-E

Werner, per our discussion
this morning regarding whether a development of five or more dwelling units is considered residential or commercial, I thought I'd share these definitions with you. These definitions are the same for SCE, PG&E, and SDG&E.
I'm assuming you don't me to clarify with PG&E or SDG&E any longer since these definitions are within Rule 15 and 16, but please let me know if you feel otherwise. Thanks.

Residential Development: Five (5) or more dwelling units in two (2) or more buildings located on a single parcel of land.

Commercial Development: Two (2) or more enterprises engaged in trade or the furnishing of services, (e.g., shopping centers, sales enterprises, business offices, professional offices, and educational or governmental complexes) and located on a single parcel or on two (2) or more contiguous parcels of land.

Dara Morgan
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From:

"Blumer, Werner M."
<werner.blumer@cpuc.ca.gov>
To:
"Caulson, Megan"
<MCaulson@semprautilities.com>

Cc:
Redacted

<Darrah.Morgan@sce.com>

Date: 04/12/2010 11:27 AM

Subject:

RE: DATA REQUEST: Compliance with R.
92-03-050 standardization of Rules 15 and 16 and SCE AL 2453-E

Megan,

Thank you for considering this change. Meanwhile Darrah Morgan, Lisa Ornelas and I had a conversation about this issue and they will contact you and PG&E about a slight addition to the definition to clarify it better for customers and tie it in with "permanent".

Have a great
day,

Werner

From: Caulson, Megan [mailto:MCaulson@semprautilities.com]
Sent: Friday, April 09, 2010 12:41 PM
To: Blumer,
Werner M.
Cc: Redacted
'Darrah.Morgan@sce.com'
Subject: FW: DATA REQUEST: Compliance with R.
92-03-050 standardization of Rules 15 and 16 and SCE AL 2453-E

Werner,

Hope you've
been doing well...

Per your note
below, SDG&E has reviewed it's definition of "Applicant" in both Electric Rules 15 & 16 and is in agreement with the recommendation from the ED to clarify our current understanding/processes by adding the word "developer" to the current definition of Applicant.

I'll get an Advice

Letter drafted to modify SDG&E's Electric Rule 15 -- Distribution Line Extensions (Section J - Definitions) & Electric Rule 16 -- Service Extensions (Section H - Definitions) so that they will read:

Applicant: A person, developer, or agency requesting utility to supply electric service

Please let me know if anything changes or we need to do anything further.

Thanks,
Megan Caulson
SDG&E Rates, Regulations & Tariffs

From: Blumer, Werner M.
<werner.blumer@cpuc.ca.gov>
To: Hughes, John (Reg Rel)
<J8HS@pge.com>; [Redacted]
Cc: Darrah.Morgan@sce.com
<Darrah.Morgan@sce.com>; Schumacher, Brian D.
<brian.schumacher@cpuc.ca.gov>
Sent: Mon Apr 05 11:04:49
2010
Subject: DATA REQUEST: Compliance with R. 92-03-050
standardization of Rules 15 and 16 and SCE AL 2453-E
Dear Mr. Hughes and [Redacted]
[Redacted]

Subject
SCE AL requests inclusion of "developer" in the "Applicant" definition reflecting SCE's changed treatment of those with regards to Line and Service extensions in a manner already practice with PG&E and SDG&E since 1992.

Evaluation of this proposal revealed however that PG&E's and SDG&E's tariff does not define "developer" specifically as Applicant. For the sake of clarity and compliance with R. 92-03-050 for tariff consistency we suggest that PG&E and SDG&E consider amending their tariffs accordingly and request your plan on this issue.

Thank
you very much for your response by April 12, 2010.

Sincerely,

Werner Blumer

CPUC - Energy Division