

From: [Redacted]  
Sent: 6/22/2010 12:15:58 PM  
To: [Redacted];  
mcaulson@semprautilities.com (mcaulson@semprautilities.com);  
'Darrah.Morgan@sce.com' (Darrah.Morgan@sce.com);  
JHayes@semprautilities.com (JHayes@semprautilities.com)  
Cc: Garber, Stephen (Law) (/o=PG&E/ou=Corporate/cn=Recipients/cn=SLG0); Hughes,  
John (Reg Rel) (/O=PG&E/OU=Corporate/cn=Recipients/cn=J8HS); [Redacted]  
[Redacted];  
werner.blumer@cpuc.ca.gov (werner.blumer@cpuc.ca.gov); lisa.ornelas@sce.com  
(lisa.ornelas@sce.com); Loring.Fiske-phillips@sce.com (Loring.Fiske-  
phillips@sce.com)  
Bcc:  
Subject: RE: Rule 15 - Developers as Permanent Customers

Darah,

An Applicant is defined in PG&E's Rule 15 as:

"APPLICANT: A person or agency requesting PG&E to supply electric service"

I would say that a developer is ultimately the agent of the (end-use) customer and therefore can be an Applicant.

[Redacted]

**From:** Darrah.Morgan@sce.com [mailto:Darrah.Morgan@sce.com]  
**Sent:** Monday, June 21, 2010 3:14 PM  
**To:** [Redacted]; Mcaulson@semprautilities.com; JHayes@semprautilities.com; [Redacted]  
**Cc:** Hughes, John (Reg Rel); [Redacted]; Garber, Stephen (Law); werner.blumer@cpuc.ca.gov;  
Lisa.Ornelas@sce.com; Loring.Fiske-phillips@sce.com  
**Subject:** Rule 15 - Developers as Permanent Customers

As you might recall, SCE filed Advice 2453-E to begin considering and treating developers as a permanent Rule 15 Applicants, rather than treating the eventual end-use customer as the permanent applicant. We received a Data Request and exchanged several e-mails with Werner Blumer of the Energy Division as a result. Both SDG&E and PG&E were also kind enough to agree to file an advice letter and include "developer" in their respective Rule 15 Applicant definitions; however, I'm not sure that will be necessary.

I believe all our Rule 15.C.2. Basis of Allowances provisions are the same; therefore, can you tell me why you consider a developer as the permanent Applicant or do you consider a developer as an Applicant (not necessarily permanent) by virtue of the tariff language below in red font?

2. BASIS OF ALLOWANCES. Allowances shall be granted to an Applicant for Permanent Service, or to an Applicant for a subdivision or development under the following conditions:

- a. SCE is provided evidence that construction will proceed promptly and financing is adequate, and
- b. Applicant has submitted evidence of building permit(s) or fully-executed home purchase contract(s) or lease agreement(s), or
- c. Where there is equivalent evidence of occupancy or electric usage satisfactory to SCE.

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

Redacted

To: "Blumer, Werner M." <werner.blumer@cpuc.ca.gov>  
cc: <Darrah.Morgan@sce.com>, "Garber, Stephen (Law)" <SLG0@pge.com>, Redacted  
Redacted "Hughes, John (Reg Rel)" <J8HS@pge.com>,  
04/09/2010 "Caulson, Megan" <MCaulson@semprautilities.com>  
01:09 PM Subject: RE: DATA REQUEST: Compliance with R. 92-03-050 standardization of Rules 15 and 16 and SCE AL 2453-E

Werner,

Along that same vein and for the sake of consistency, PG&E agrees to modify the definition sections of its Rule 15 and Rule 16 to conform with the "Applicant" language proposed by SCE. The new definition will read.

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

To further clarify this new Rule 15/16 definition of "Applicant", with respect to the definition of "Applicant" found elsewhere in PG&E's tariffs, it is likely that we will also file for changes to the definition of "Applicant" in our Rule 1. These changes will be along the lines of the more expansive definition of Applicant found in SCE's Electric Rule 1.

We expect to file these changes in the next couple of weeks.

Please call if you have any questions.

Redacted  
Regulation and Rates

Manager, Gas and Electric Tariffs

Redacted

**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 Ms. 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