

From: Jacobson, Erik B (RegRel)
Sent: 9/8/2010 2:08:07 PM
To: 'Fulcher, Jack' (jack.fulcher@cpuc.ca.gov)
Cc:
Bcc:
Subject: RE: Affiliate Advice Letter Filings

Hi Jack,

Just wondering when you think you will be able to send us your revised questions so we can keep this process moving forward. We would still like to work with you on a revised advice letter that addresses your concerns. Any luck in getting some support from the legal division regarding the 5% ownership/control threshold issue (e.g., Michell Shapson)?

Once we get you written responses to your new questions, I think it would make sense to sit down again to continue our dialogue and identify gaps, if any, in the revised advice filing we discussed at our last meeting.

Let me know if there is anything else you need from us.

Best regards,

Erik

From: Fulcher, Jack [mailto:jack.fulcher@cpuc.ca.gov]
Sent: Thursday, August 05, 2010 6:11 PM
To: Jacobson, Erik B; Kahlon, Gurbux; Kahlon, Gurbux; Roscow, Steve
Subject: RE: Affiliate Advice Letter Filings

Hi Erik. We really don't need anything from your corporate folks. Since we only have an hour, this may be a workable agenda for us:

1. One minute for intros.
2. Since you probably want to give a presentation, how about ten minutes?

3. We have some issues that definitely need to be addressed (excuse the horrible formatting for this email):
- a. We still need a description of how your "CSI administrator" role works. What decisions are made? How are interconnection, repair and maintenance, and other decisions requiring timing and logistics made? What specific procedures do you have in place that prevent bias for or against particular solar companies? (Please don't just say you tell your employees to be good.)
 - b. What has PG&E's (including any of the employees doing such things as analysis, engineering, and management planning) role been in the research and planning for this project?
 - c. You've claimed that there's no incentive to favor one company over another. Doesn't the corporation have a financial interest in the continued health, and growth, of SunRun?
 - d. How big a stake is the \$100 million investment in SunRun? How about the \$61 million in SolarCity? Why aren't they affiliates under the affiliate transaction rules?
 - e. I believe you agree that Banyan is an affiliate of the utility under the rules. Will you file something confirming this?
 - f. You say in your recent AL that the utility won't transact with the affiliate except under the constraints of the CSI tariff. What does this mean?
 - g. You also say the utility will do some stuff for the affiliate under Rule V.E, allowed corporate shared services. What are these activities? How will the transfer pricing be handled?
 - h. How will the utility prevent marketing abuses by the companies? Won't they trade on their association with PG&E? If successful, won't this benefit your affiliate?
 - i. Is the WSJ article right? Will SunRun really charge customers 20 cents per kWh for energy?
 - j. Given our rejection of the first AL, will you file for this project through an application?

Whew! A long list, I know, Erik; we've been asking you pretty much most of these same questions since the first AL, so I'm sure they're no surprise. Let's say we give you 30 minutes, with the balance for questions. And please, no corporate folks.

Thanks, Erik. See you tomorrow at 11. Jack

Message-----

From: Jacobson, Erik B [<mailto:EBJ1@pge.com>]

Sent: Thu 8/5/2010 5:33 PM

To: Kahlon, Gurbux; Fulcher, Jack; Fulcher, Jack; Kahlon, Gurbux; Roscow, Steve

Subject: RE: Affiliate Advice Letter Filings

Jack, Gurbux and Steve,

Here's a proposed agenda for our 11am meeting tomorrow regarding our affiliate rules compliance advice filings and the Corporation's tax equity investments. We will bring hard copies to the meeting. We have different representatives that will attend the two parts to the meeting --- to keep that separation between Corp and the utility.

We look forward to seeing you.

Erik

Proposed Agenda

Part I: Discussion with PG&E (11:00 - 11:40)

1 Background

- 2 Affiliate rule compliance regarding Pacific Energy Capital I; supplemental advice filing proposal
- 3 Pacific Energy Capital II advice filing
- 4 Next steps

Part II: Discussion with PG&E Corporation (11:40-12:00)

- 1 Status of PG&E Corporation's PV tax equity transactions
- 2 Q&A

-----Original Appointment-----

From: Jacobson, Erik B

Sent: Tuesday, July 20, 2010 6:33 PM

To: Jacobson, Erik B; 'Kahlon, Gurbux'; 'Fulcher, Jack'; 'jef@cpuc.ca.gov'; 'Gurbux Kahlon'; 'Steve Roscow'

Subject: Affiliate Advice Letter Filings

When: Friday, August 06, 2010 11:00 AM-12:00 PM (GMT-08:00) Pacific Time (US & Canada).

Where: CPUC Offices rm 4010

Jack, Please feel free to forward to other Energy Division staff you feel should attend the meeting. Thanks, Erik