

September 8, 2010

Advice 3130-G-A

(Pacific Gas and Electric Company ID U39 G)

Public Utilities Commission of the State of California

Subject: Supplemental Filing: Request to Implement a Three-Year Winter Gas Savings Program for Residential and Commercial Customers

Pacific Gas and Electric Company ("PG&E") hereby submits for filing revisions to its gas tariffs. The affected tariff sheets are listed on the enclosed Attachment 2.

Purpose

PG&E requests that the California Public Utilities Commission ("CPUC" or "Commission") approve a three-year Winter Gas Savings Program ("WGSP" or "Program") beginning in 2011. The goal of the WGSP is to raise conservation awareness and help customers reduce their gas usage by focusing on the efficient use of natural gas in both homes and businesses.

This filing supersedes Advice 3130-G in its entirety. To address the Division of Ratepayer Advocates' (DRA) concern, PG&E hereby proposes to collect annually in rates up to \$4.3 million, rather than \$4.75 million as originally proposed in 3130-G, in marketing and administrative costs for each year of the three-year winter gas savings program.

Three-Year Winter Gas Savings Program Proposal

In order to most effectively promote the WGSP through integrated conservation and energy efficiency marketing programs, PG&E proposes in this advice filing to establish a three-year WGSP. Approval of a program period longer than one year will allow more effective use of funding in the following ways:

- It enables PG&E to leverage complementary outreach campaigns throughout the year for promotion of the WGSP, thereby providing year-round opportunities for customers to receive and respond to gas conservation messages.

- It enables PG&E to develop broader WGSP marketing partnerships than were possible under an annual WGSP, given the typically short timeframe between CPUC approval and program launch that occurs under an annual program.

The WGSP will continue for a three-year period, at the end of which PG&E may allow the program to sunset, propose changes or alternatives to the program, or propose to continue the program in a similar manner. PG&E proposes to submit the results of the previous year's WGSP annually to the Energy Division.

Winter Gas Savings Program Description

For the past five years, PG&E has offered a Winter Gas Savings Program as part of a comprehensive set of energy efficiency and conservation programs. The WGSP is a one-of-its-kind program in California that provides residential and commercial customers with a financial incentive to safely and responsibly reduce their natural gas use during heavy-demand winter months when natural gas prices are typically high. When approving PG&E's 2008 WGSP, the Commission stated: "These programs were authorized because the Commission found that they should encourage conservation and provide customers with an opportunity to lower their winter gas bills."¹

The structure of the proposed three-year WGSP is identical to that of the 2010 WGSP.² Residential and commercial gas customers will receive a gas bill credit of 20 percent if they reduce their cumulative natural gas usage by 10 percent or more from January 1 through the end of February (Program Period or WGSP Period) of the eligible program year. If a customer's gas conservation is below 10 percent, the customer will receive a one-to-one credit (e.g. reduce usage by 5 percent, earn a 5 percent credit). As before, PG&E will apply a weather adjustment factor in order to more accurately reward conservation efforts.

As in past years, PG&E will conduct a comprehensive marketing and customer outreach campaign to promote the WGSP. PG&E requests Energy Division's approval of the three-year WGSP by August 15, 2010, so that PG&E may begin its marketing and customer outreach efforts. These marketing efforts will support an awareness and educational campaign that will provide customers with information on how to lower gas usage and increase energy efficiency both at home and at work. Approval of a three-year WGSP will enable PG&E to expand its marketing efforts in order to encourage conservation behaviors that may provide additional gas usage reduction opportunities. Additionally, PG&E will be able to develop external marketing partnerships that will support cross-promotion of conservation efforts.

¹ Resolution G-3405, p. 2-3.

² See PG&E Advice 3039-G.

Eligibility

PG&E residential and commercial customers on Gas Rate Schedules G-1, G-1 NGV, GM, GS, GT, GL-1, GL1-NGV, GML, GSL, GTL, G-NR1, and G-NR2 are eligible for the WGSP. All customers served on these eligible rate schedules will participate in the program as long as: (1) they began service with PG&E before November 1 of the preceding year; (2) they maintain continuous service at the same service address through February of the eligible program year; and (3) any PG&E customer had continuous service at the service address during a WGSP period in the previous three years.³

Program Period

Credits and usage comparisons for the WGSP are based upon usage from January 1 through the end of February in each program year.⁴ Because most meters are read once a month, PG&E encourages its customers to begin their conservation efforts in December and continue through March in order to fully capture reductions in January and February usage that will determine a customer's credit.⁵

Winter Gas Savings Program Credit Methodology

The WGSP credit will mirror the previous year's credit structure. Residential and commercial gas customers will receive a 20 percent credit on their total gas bill if they reduce their cumulative natural gas usage by 10 percent or more during January and February of the program year, as compared to a three-year average computed over the same monthly period. If their gas conservation is below 10 percent, customers will receive a one-to-one credit (e.g. reduce usage by 5 percent, earn a 5 percent credit) on their total gas bill.⁶

Base Year Usage Calculation

Identical to the 2010 WGSP, PG&E proposes to use customer usage data for the prior three years, if available, to calculate the WGSP credit. However, if a customer's usage history for the previous program period is not available, then the

³ PG&E will allow premise usage, also known as a customer service address, to be used to calculate the base year usage target.

⁴ For customers billed based on SmartMeter™ data, usage comparisons and credits will be based upon actual daily usage during the WGSP period (January – February).

⁵ For bills that contain days outside of the WGSP period (January – February), an Average Daily Usage for each billing period will be calculated and then prorated for the number of days in the WGSP period.

⁶ Consistent with the 2010 WGSP, customers taking service under a qualifying rate schedule in conjunction with noncore transportation rate Schedule G-EG and/or Schedule G-NT on the same service agreement do not qualify for the program. Also consistent with the 2010 WGSP, the bill credit will be calculated on applicable PG&E natural gas charges, including charges billed under Schedule G-PPPS – *Gas Public Purpose Program Surcharge*. Charges billed under Schedule G-SUR – *Customer-Procured Franchise Fee Surcharge*, Schedule G-CS - *ClimateSmart* and any applicable utility user's taxes and City Franchise Surcharge will be excluded from the credit calculation.

previous three years' historic usage at the premise may be used to determine the base usage.

Weather Adjustment Factor

PG&E will include a weather adjustment factor in order to more equitably measure customer conservation efforts. To accomplish this, PG&E will adjust the base year usage against which customer conservation efforts are measured to reflect actual weather patterns during the WGSP period. The details of this weather adjustment are defined in Schedule G-WGSP – *Winter Gas Savings Program* filed herein.

Winter Gas Savings Program Analysis

Last year, PG&E reported on the results of its 2009 WGSP, which were characterized as particularly impressive.⁷ The 2009 WGSP had an increase of approximately 40 percent in customer participation compared to the prior year (2.4 million vs. 1.7 million service agreements). Qualifying customers received bill credits in 2009 totaling approximately \$60 million, which was a 39 percent increase over 2008. The results from the 2009 WGSP stood out in many ways as unique when compared to prior years.

Program results for 2010 were more in line with those of years prior to 2009, with 1.9 million service agreements qualifying for credits totaling \$37 million. Customers reduced their natural gas usage by approximately 72 million therms during January and February. These usage reductions translate to greenhouse gas emission reductions equivalent to removing 42,000 passenger cars from the road for one year. Customers who qualified for the WGSP received bill credits in March and April.

Winter Gas Savings Program Cost Recovery

PG&E requests authorization to recover \$4.3 million annually from customers over the length of the three year WGSP for marketing, outreach, and administrative costs. At the end of the three-year WGSP, PG&E will return in rates any difference between the authorized revenue requirement and the actual marketing, outreach, and administrative costs.

PG&E proposes that each customer class pay for its corresponding share of marketing and implementation costs and for the actual program credits received by that class. The final WGSP costs allocated to each customer class will also reflect the actual split between procurement and transportation⁸. The illustrative rate impact of the 2011 WGSP costs on the participating customer classes is shown in Attachment 1, Tables 1 and 2.

⁷ See PG&E Advice 3039-G.

⁸ This is consistent with the agreement with the School Project for Utility Rate Reform (SPURR) in 2005, as approved in Advice 2675-G-A.

PG&E proposes to continue the current WGSP cost recovery mechanism, most recently approved by the Commission in Advice 3039-G. For residential customers, PG&E proposes that the forecast program costs be recovered in procurement and transportation rates from April through October, when natural gas prices are generally lower, to further mitigate higher winter season customer bills. For commercial customers, who have widely varying usage patterns across the year, PG&E proposes to recover the forecast program costs over the entire calendar year. Procurement- and transportation-related WGSP costs and revenues will be recorded in the WGSP subaccounts of the Purchased Gas Account (PGA) and Core Fixed Cost Account (CFCA), respectively.

Identical to the 2010 WGSP, PG&E will annually estimate WGSP credits and provide the resulting rates for recovery of these estimated costs and credits in its Annual Gas True-Up (AGT) filing to be filed on November 15 of each year. PG&E will then update these estimates in its AGT update filing in December using an updated forecast cost of gas for January and February of the following year. This will ensure that PG&E collects an estimated credit amount that reflects the expected natural gas procurement prices during the WGSP period.

Authorized WGSP costs will be recorded initially in the corresponding subaccounts based on the forecast procurement/transportation split submitted in the AGT advice letter update filing in December. This forecast procurement/transportation split will be adjusted once the actual WGSP customer credits are calculated to ensure that each customer class pays for its corresponding costs.

In order to ensure that program costs are paid for by the customer class receiving the benefit, any difference between the forecast and actual program costs will be recovered in the corresponding procurement and transportation rates by customer class during the following year (i.e., any difference between forecast and actual 2011 costs will be recovered in 2012). The WGSP subaccount balance of the PGA, based on the November recorded balance plus a forecast of December activity, will be amortized in the monthly core procurement rates (Gas Schedule G-CP) beginning on January 1 of the following year. Similarly, the WGSP subaccount balance of the CFCA, based on the November recorded balance plus a forecast of December activity, will be amortized in core transportation rates beginning on January 1 of the following year as part of the AGT.

Bill Credits to Submetered Customers

PG&E shall provide a notice to all master-metered customers with submetered tenants of their obligation to pass along any refunds to their tenants, in accordance with Public Utilities Code 739.5(b). PG&E will send a notification letter to all master-metered customers with submetered tenants explaining the WGSP bill credit and providing sample calculations. The sample calculations provide guidance to the

master-metered customers on how to appropriately calculate the bill credit amount for each tenant.

Tariff Revisions

Please see Attachment 2 for the proposed revisions to Rate Schedule G-WGSP.

Protest Period

The Energy Division has granted a 10-day protest period for this supplemental filing. Anyone wishing to protest this filing may do so by sending a letter by **September 20, 2010**, which is 12 days from the date of this filing.⁹ As provided for by Section 7.5.1 of General Order 96-B, "any new protest shall be limited to the substance of the supplement or additional information." Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jjn@cpuc.ca.gov and mas@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Jane K. Yura
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
E-mail: PGETariffs@pge.com

⁹ Because the 10-day protest period falls on a weekend, PG&E is moving the protest period to the next business day.

Effective Date

Customer research has indicated that there may be merit in providing earlier notice of the program, in order to increase customer awareness and allow time for customers to take action on conservation tips that could lower gas usage. For this reason, PG&E would like to request that Energy Division approve this filing with an effective date of **September 22, 2010**. As discussed herein, the proposed WGSP will be implemented beginning on January 1, 2011.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and parties on the service lists for A.09-05-026 and A.09-09-013. Address changes to the General Order 96-B service list should be directed to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.



Vice President - Regulation and Rates

cc: Service Lists – A.09-05-026 and A.09-09-013

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 M)**

Utility type:

- ELC GAS
 PLC HEAT WATER

Contact Person: Linda Tom-Martinez

Phone #: (415) 973-4612

E-mail: lmt1@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
 PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3130-G-A**

Tier: 2

Subject of AL: Supplemental Filing: Request to Implement a Three-Year Winter Gas Savings Program for Residential and Commercial Customers

Keywords (choose from CPUC listing): Energy Efficiency, Compliance

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: G-3405

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for:

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: **September 22, 2010**

No. of tariff sheets: 5

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Gas Rate Schedule G-WGSP

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Tariff Files, Room 4005

DMS Branch

505 Van Ness Ave.,

San Francisco, CA 94102

jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Jane Yura

Vice President, Regulation and Rates

77 Beale Street, Mail Code B10B

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

Advice 3130-G-A

Attachment 1

**PACIFIC GAS AND ELECTRIC COMPANY
2011-2013 WINTER GAS SAVINGS PROGRAM ADVICE LETTER
ILLUSTRATIVE IMPACT BY CLASS OF MARKETING AND IMPLEMENTATION COSTS***

Table 1

<u>Line</u>		<u>Bundled</u>	<u>Transportation</u>	<u>Procurement</u>
	Illustrative 2011-2013 WGSP Marketing and Implementation RRQ as % of Current Annual Average Rates			
1	Residential	0.1%	0.1%	0.1%
2	Small Commercial	0.1%	0.1%	0.1%
3	Large Commercial	0.1%	0.1%	0.1%
	Illustrative Rate Impact by Class of Proposed WGSP Marketing and Implementation Revenue Requirement**			
4	Residential	-0.01%	-0.01%	-0.01%
5	Small Commercial	-0.01%	-0.01%	-0.01%
6	Large Commercial	-0.01%	-0.01%	-0.01%

* Final impacts of the 2011-2013 Winter Gas Savings Programs Marketing and Implementation Costs will be based on credits earned by each class during each year, reflecting segmentation between transportation and procurement causation. This final impact will be trued-up through allocation of the WGSP Marketing and Implementation Costs in PG&E's 2012-2014 Annual Gas True-Ups (AGT's).

** 2011-2013 WGSP Marketing and Implementation Revenue Requirement is lower than the authorized 2010 WGSP M&I Revenue Requirement.

PACIFIC GAS AND ELECTRIC COMPANY
2011-2013 WINTER GAS SAVINGS PROGRAM ADVICE LETTER
ILLUSTRATIVE IMPACT BY CLASS OF MARKETING AND IMPLEMENTATION COSTS

TABLE 2

Line		<u>Total Core (excl. NGV)</u>	<u>Transportation and Public Purpose Program</u>	<u>Procurement</u>
1	Illustrative 2010 Total Gas Revenue Requirement Allocated to Core Classes (\$000, excl. NGV)*	\$3,451,360	\$1,449,913	2,001,447
2	Resulting Percentage Splits Between Transportation and Procurement	100.000%	42.010%	57.990%
3	Proposed WGSP Marketing and Implementation Revenue Requirement (\$000)	\$4,300	↓	↓
4	Illustrative Franchise and Uncollectibles Fees (Currently Effective at 1.2151%)	\$52		
5	WGSP Marketing and Implementation Revenue Requirement for Illustrative Allocation and Recovery	\$4,352	\$1,828	\$2,524
Illustrative Allocation Factors Among Participating Core Classes Based on Currently Adopted Cost Allocation				
6	Residential		77.0%	76.2%
7	Small Commercial		21.9%	22.0%
8	<u>Large Commercial</u>		1.1%	1.8%
9	Totals		100.0%	100.0%
Illustrative Allocation Among Participating Core Classes (\$000)				
10	Residential		\$1,408	\$1,922
11	Small Commercial		\$401	\$556
12	<u>Large Commercial</u>		\$19	\$46
13	Totals		\$1,828	\$2,524
Adopted Volumes (mth; 2010 BCAP)				
14	Residential		2,011,140	1,980,642
15	Small Commercial		792,357	582,543
16	<u>Large Commercial</u>		74,543	49,762
17	Totals		2,878,039	2,612,946
Illustrative WGSP Marketing and Implementation Revenue Requirement in Rates (\$/th)				
18	Non-CARE Residential**	<u>Bundled</u> \$0.00167	<u>Transportation</u> \$0.00070	<u>Procurement</u> \$0.00097
19	Non-CARE Small Commercial**	\$0.00146	\$0.00051	\$0.00095
20	Large Commercial	\$0.00118	\$0.00026	\$0.00092
Illustrative 2011-2013 WGSP Marketing and Implementation RRQ as % of Current Annual Average Rates				
21	Residential	0.1%	0.1%	0.1%
22	Small Commercial	0.1%	0.1%	0.1%
23	Large Commercial	0.1%	0.1%	0.1%
Illustrative Rate Impact by Class of Proposed WGSP Marketing and Implementation RRQ***				
24	Residential	<u>Bundled</u> -0.01%	<u>Transportation</u> -0.01%	<u>Procurement</u> -0.01%
25	Small Commercial	-0.01%	-0.01%	-0.01%
26	Large Commercial	-0.01%	-0.01%	-0.01%

* The illustrative 2010 Gas Revenue Requirement Allocation applicable to core classes eligible for WGSP is used to develop the factors to split illustratively the WGSP Marketing and Implementation costs between transportation and procurement rates for recovery. The actual splits will be based on the recorded causation of the credits.

** CARE customers receive a 20% Discount

*** 2011-2013 WGSP Marketing and Implementation Revenue Requirement is lower than the authorized 2010 WGSP M&I Revenue Requirement.

**ATTACHMENT 2
Advice 3130-G-A**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
28353-G	GAS SCHEDULE G-WGSP WINTER GAS SAVINGS PROGRAM Sheet 1	27765-G
28354-G	GAS SCHEDULE G-WGSP WINTER GAS SAVINGS PROGRAM Sheet 2	27766-G
28355-G	GAS SCHEDULE G-WGSP WINTER GAS SAVINGS PROGRAM Sheet 3	27767-G
28356-G	GAS TABLE OF CONTENTS Sheet 1	28350-G
28357-G	GAS TABLE OF CONTENTS Sheet 3	28351-G



GAS SCHEDULE G-WGSP
WINTER GAS SAVINGS PROGRAM

Sheet 1

APPLICABILITY: Schedule G-WGSP rewards gas customers who reduce their natural gas usage from their Base Usage (defined below) during the Winter Gas Savings Program (WGSP) period from January 1 through February 28, (through February 29 in a leap year) of each calendar year 2011, 2012 and 2013. Customers who reduce usage by at least ten percent (10%) will receive a twenty percent (20%) credit. Customers who reduce usage from one to nine percent (1% - 9%) will receive a corresponding 1% to 9% credit. This schedule is applicable to residential and commercial customers served on one of the following PG&E rate schedules: G-1, G1-NGV, GL1-NGV, GM, GS, GT, GL-1, GML, GSL, GTL, G-NR1 and G-NR2. (T)
 I
 I
 (T)

The following are excluded from participating in this schedule: (1) customers where continuous service (for either the current or any previous customer) did not exist at the service address for one or more of the previous WGSP periods in the previous three (3) years; (2) customers who initiated service at their current service address on or after November 1 of the preceding year; and (3) customers taking service under a qualifying rate schedule in conjunction with noncore transportation rate Schedule G-EG and/or Schedule G-NT on the same service agreement. (T)
 I
 (T)

Schedule G-WGSP establishes a limited credit for natural gas conservation to assist customers in managing their winter gas bills. Regardless of the customer's billing cycle, the start and end dates of this program are January 1 and February 28 (February 29 in a leap year), respectively, for all eligible customers. (T)
 (T)

TERRITORY: This schedule applies everywhere PG&E provides natural gas service.

RATES: The credit is available to eligible customers achieving a reduction in natural gas usage during the period January 1 through February 28 (February 29 in a leap year) WGSP period of each calendar year in years 2011, 2012, or 2013, compared to the customer's Base Usage. (T)
 (T)

Base Usage (BU) equals the customer's average usage at the service address for the same period during the prior three winters, if available, adjusted for leap years and weather differences on a monthly basis. The weather differences have resulted in an average decrease in BU of four percent (4.0%) for residential customers and three and one-tenth percent (3.1%) for commercial customers. (T)
 (T)

The customer's bill will continue to be calculated according to their otherwise applicable schedule during the program period.

Customers who reduce usage by at least ten percent (10%) during the program period will receive a twenty percent (20%) credit on their PG&E natural gas charges in the subsequent billing period. Customers who reduce usage from one to nine percent (1% - 9%) during the program period will receive a corresponding 1% to 9% credit on their PG&E natural gas charges in the subsequent billing period. (L)

(Continued)

Advice Letter No: 3130-G-A
 Decision No.

Issued by
Jane K. Yura
 Vice President
 Regulation and Rates

Date Filed September 8, 2010
 Effective _____
 Resolution No. G-3405



GAS SCHEDULE G-WGSP
WINTER GAS SAVINGS PROGRAM

Sheet 2

**SPECIAL
 CONDITIONS:**

1. If the customer was not at the current service address or does not have usage for the prior three (3) WGSP periods, PG&E may include prior customer(s)'s usage at the service address, when available, as a proxy for the customer's usage in the calculation of the current Winter Program Period's BU . (L)
(T)
|
(T)
2. Customer must meet the applicability criteria of the program and also receive continuous service during the program period. (L)
(L)
(D)
3. If successful in reducing natural gas usage, customers will receive a credit on their PG&E natural gas charges for the period January 1 and February 28 (February 29 in a leap year) of the eligible program year, excluding utility user's taxes, franchise fee surcharges under Schedule G-SUR, the City Franchise Surcharge and ClimateSmart Charges, which are prorated, as necessary, to put the charges on an equivalent calendar year basis. The credit will be calculated on applicable PG&E customer, procurement, and transportation charges, and applicable charges billed under Schedule G-PPPS. (T)
|
|
|
(T)
4. For customers billed with SmartMeter™ data in place prior to the start of the WGSP, the actual exact daily usage during the program period between January 1 and February 28 will be used. All customers whose billing periods do not align exactly with the January 1 and February 28 respective start and end dates of the program will have their usage prorated during those months.
5. The customer's reduction in natural gas usage will be rounded to the nearest whole number percentage point for the purpose of determining eligibility for the credit.
6. A system-wide correction of the BU amount will be made for colder or warmer than normal weather that might occur during the program period. Heating Degree Days (HDD) is a measure of how far below a standard reference temperature (60 degrees Fahrenheit) the actual temperatures during the program period have been. The temperature readings at eleven (11) National Weather Service stations in PG&E's service area will be used. BU amounts will be adjusted in the event that actual temperatures during the program period (as measured by HDD) differ from normal system-wide weather HDD. Normal system-wide weather for the program period is 588.0 HDDs. The system-wide HDDs for the program period will be based on all available recorded weather data and a forecast of the remaining weather to allow for the credit to be issued during the next billing period bill on or after February 28 of the eligible program year. (T)

(L)

(Continued)

Advice Letter No: 3130-G-A
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 Resolution No. G-3405



GAS SCHEDULE G-WGSP
WINTER GAS SAVINGS PROGRAM

Sheet 3

SPECIAL
 CONDITIONS:
 (Cont'd.)

- 7. PG&E is not required to develop an adjusted BU amount for customers that might have experienced increased consumption due to occupancy increases or changes in consumption patterns, or for customers who have implemented efficiency and conservation measures in the previous year to allow these customers to qualify for the bill credit. (L)
- 8. A minimum reduction of 1% is required to receive a credit. Similarly, customers exceeding 10% reductions will only be rewarded with a 20% credit.
- 9. For customers with multiple accounts, summary billings, or multiple meters at a premise, the credit will be calculated and applied, if applicable, to each of the customer's individual service agreements.
- 10. For master-metered customers that sub-meter, the credit shall be determined by usage measured by the master-meter. Master-metered customers, including mobile home park owners with sub-metered tenants, receiving a credit shall distribute the credit to sub-metered tenants consistent with Public Utilities Code section 739.5(b). (L)
- 11. Any disputes arising from the provision of service under this Schedule or other aspects of the Winter Gas Savings Program will be deemed disputes over amounts billed for natural gas and will be handled as provided for in PG&E's Rule 10, Disputed Bills.
- 12. PG&E normally reads meters each month with minor exceptions. If, because of unusual conditions or for reasons beyond PG&E's control, the customer's meter cannot be read on the scheduled reading date, or if for any reason accurate meter data is not available, PG&E will make estimates according to its applicable tariff rules. In these instances, the estimated meter reads will form the basis of the comparisons in determining whether customers qualify for the bill credit.

Advice Letter No: 3130-G-A
 Decision No.

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 Regulation and Rates

Date Filed September 8, 2010
 Effective _____
 Resolution No. G-3405



GAS TABLE OF CONTENTS

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page.....	28356-G	(T)
Rate Schedules	28343,28357-G	(T)
Preliminary Statements.....	28352,28104-G	
Rules.....	28239-G	
Maps, Contracts and Deviations.....	23208-G	
Sample Forms	27715,28240,27262,27113,25059-G	

(Continued)

Advice Letter No: 3130-G-A
 Decision No.

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Date Filed September 8, 2010
 Effective _____
 Resolution No. G-3405



GAS TABLE OF CONTENTS

Sheet 3

SCHEDULE TITLE OF SHEET CAL P.U.C. SHEET NO.

**Rate Schedules
 Non-Residential**

G-AFTOFF	Annual Firm Transportation Off-System.....	24466,27960,22057-G
G-SFT	Seasonal Firm Transportation On-System Only.....	24467,27961,22178-G
G-AA	As-Available Transportation On-System.....	24468,27962-G
G-AAOFF	As-Available Transportation Off-System.....	24469,27963-G
G-NFT	Negotiated Firm Transportation On-System.....	24470,22909-22910-G
G-NFTOFF	Negotiated Firm Transportation Off-System.....	24471,19294,21836-G
G-NAA	Negotiated As-Available Transportation On-System	24472,22911,22184-G
G-NAAOFF	Negotiated As-Available Transportation Off-System	24473,22912-22913-G
G-OEC	Gas Delivery To Off-System End-Use Customers.....	22263-22264-G
G-CARE	CARE Program Service for Qualified Nonprofit Group Living and Qualified Agricultural Employee Housing Facilities.....	23 367-G
G-XF	Pipeline Expansion Firm Intrastate Transportation Service	27964-27965-G
G-PARK	Market Center Parking Service.....	24597,18177-G

**Rate Schedules
 Other**

G-LEND	Market Center Lending Service.....	24598,18179-G
G-CT	Core Gas Aggregation Service.....	28349,21740,25112,21741,20052,25513, 24307,26869,24307,26869,25115,25116,23305,22155,22156,25117,22158-G
G-CRED	Billing Credits for CTA-Consolidated Billing.....	20063-G
G-SUR	Customer-Procured Gas Franchise Fee Surcharge	28315-G
G-PPPS	Gas Public Purpose Program Surcharge.....	27590,23704-G
G-ESP	Consolidated Pacific Gas and Electric Company Billing Services to Core Transport Agents	217 39-G
G-WGSP	Winter Gas Savings Program	28353,28354,28355-G (T)

**Rate Schedules
 Experimental**

G-CS	Climate Smart.....	24894-G
G-NGV1	Experimental Natural Gas Service for Compression on Customers Premises.....	28340,27653-G
G-NGV2	Experimental Compressed Natural Gas Service	28341,27655-G
G-NGV4	Experimental Gas Transportation Service to Noncore Natural Gas Vehicles	27656,27966,27658-G
G-LNG	Experimental Liquefied Natural Gas Service.....	27967,21890-G

(Continued)

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Jane K. Yura
 Vice President
 Regulation and Rates

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**PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV**

Aglet	Defense Energy Support Center	North Coast SolarResources
Alcantar & Kahl	Department of Water Resources	Occidental Energy Marketing, Inc.
Ameresco	Department of the Army	OnGrid Solar
Anderson & Poole	Dept of General Services	Praxair
Arizona Public Service Company	Division of Business Advisory Services	R. W. Beck & Associates
BART	Douglass & Liddell	RCS, Inc.
BP Energy Company	Downey & Brand	Recon Research
Barkovich & Yap, Inc.	Duke Energy	Recurrent Energy
Bartle Wells Associates	Dutcher, John	SCD Energy Solutions
Bloomberg New Energy Finance	Economic Sciences Corporation	SCE
Boston Properties	Ellison Schneider & Harris LLP	SMUD
Brookfield Renewable Power	Foster Farms	SPURR
C & H Sugar Co.	G. A. Krause & Assoc.	San Francisco Public Utilities Commission
CA Bldg Industry Association	GLJ Publications	Santa Fe Jets
CAISO	Goodin, MacBride, Squeri, Schlotz & Ritchie	Seattle City Light
CLECA Law Office	Green Power Institute	Sempra Utilities
CSC Energy Services	Hanna & Morton	Sierra Pacific Power Company
California Cotton Ginners & Growers Assn	International Power Technology	Silicon Valley Power
California Energy Commission	Intestate Gas Services, Inc.	Silo Energy LLC
California League of Food Processors	Lawrence Berkeley National Lab	Southern California Edison Company
California Public Utilities Commission	Los Angeles Dept of Water & Power	Sunshine Design
Calpine	Luce, Forward, Hamilton & Scripps LLP	Sutherland, Asbill & Brennan
Cameron McKenna	MAC Lighting Consulting	Tabors Caramanis & Associates
Casner, Steve	MBMC, Inc.	Tecogen, Inc.
Chris, King	MRW & Associates	Tiger Natural Gas, Inc.
City of Glendale	Manatt Phelps Phillips	Tioga Energy
City of Palo Alto	McKenzie & Associates	TransCanada
Clean Energy Fuels	Merced Irrigation District	Turlock Irrigation District
Coast Economic Consulting	Mirant	U S Borax, Inc.
Commerce Energy	Modesto Irrigation District	United Cogen
Commercial Energy	Morgan Stanley	Utility Cost Management
Consumer Federation of California	Morrison & Foerster	Utility Specialists
Crossborder Energy	NRG West	Verizon
Davis Wright Tremaine LLP	New United Motor Mfg., Inc.	Wellhead Electric Company
Day Carter Murphy	Norris & Wong Associates	Western Manufactured Housing Communities Association (WMA)
	North America Power Partners	eMeter Corporation