

Attachment 1: Reporting form for [Part (a) Process]

Part (a): Process for existing and prospective CCAs to obtain timely utility compliance with paragraph (9) of subdivision (c) of Public Utilities Code Section 366.2, which requires the utility to “cooperate fully with any community choice aggregators that investigate, pursue, or implement community choice aggregation programs.”

PART 1 (to be completed by CCA)

Submitted by:

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Please identify the specific matter on which the utility is not considered to be cooperating fully (add lines or pages as needed):

All PG&E bills going out to MCE customers are showing the “bundled” rate factors rather than the “unbundled” rate which the customer is actually paying. This leads customers to believe they are being double-charged for electricity.

Please provide a detailed description of the issue (add lines or pages as needed):

Although MCE customers are no longer ‘bundled’ utility customers, the bundled rate factors are continuing to appear for the PG&E electric charges on the PG&E portion of the bill. These bundled rates can be found in the tier break-down of the ‘electric account detail’ section. This inaccurate bill presentation makes it impossible for the customer to recalculate their bill accurately because the bundled rates do not add up to the total charges.

This misleading information causes customers to believe they are being double-charged for electricity as the rate factors are the same as before they were taking service from MCE. When customers call the MCE call center for an explanation of this issue and are told that the rate factors appearing on their PG&E bill are simply wrong, they frequently do not trust that response and do not find that explanation to be satisfactory.

This misleading bill is another trigger for customers to express concerns with their service as an MCE customer and results in customers opting out.

Please describe the lack of full cooperation (add lines or pages as needed):

This issue was brought to PG&E's attention in July, 2010 after customer bills were available for MCE to view. If a sample bill had been provided by PG&E earlier, as requested by MCE in April, the request from MCE for this correction would have come earlier.

MCE requested that the unbundled rate be shown instead of the bundled rate, or that, at a minimum, the unbundled rate be suppressed on the customer bills. For approximately six weeks PG&E representatives stated that this was not a concern that could be resolved.

This issue was then brought to the attention of the CPUC Energy Division in late August, 2010. After Energy Division staff requested that PG&E find a way to resolve this issue PG&E representatives reported that although they could not correctly show the 'unbundled' rate, they may be able to suppress the bundled rate and provide a 'message' on the bill, below the charges, to explain to customers what the unbundled rate is for each tier.

An 'explanation message' to that effect was drafted by MCE and PG&E and agreed to by MCE. In late October MCE was notified that the bundled rate could actually not be suppressed until November, that it would only be suppressed for a portion of customers (Res-E1) and that the remaining customers would not have the bundled rate suppressed until March, 2011 at the earliest. In addition, MCE was notified by PG&E that the message explaining the unbundled rate would only be accurate for Res-E1 customers, and that for non-Res-E1 customers, the 'explanation message' itself would be incorrect.

As of early December, 2010, to the best of MCE's knowledge, none of the proposed changes have been implemented. The bundled rate is still showing up on the customer bill, no suppression of the incorrect rates has occurred for any customer, and no 'explanation message' is appearing on the customer bill. If eventually implemented, the changes proposed by PG&E will still not resolve this issue for several thousand customers.

In discussing this issue PG&E representatives have expressed frustration that their billing system is inflexible and difficult to modify. While this is likely to be a valid issue, it is worth noting that PG&E was well aware of Marin's plans to develop a CCA program dating back to 2005, was aware of MEA's CCA Implementation Plan submitted to the CPUC in December, 2009, and even signed a service agreement with MEA in early 2010. PG&E was thus provided with ample time to devote some resources to 'system set up' to prepare for CCA Service. To have no way of addressing this predictable issue one year after MEA's Implementation Plan was submitted seems to demonstrate significant negligence rather than productive efforts to serve the customer.

Please list the personnel at the utility with whom the community choice aggregator is working:

Name	Title	Phone Number	e-mail
Redacted	PG&E Energy Solutions & Service	Redacted	Redacted
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