

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**Application of PACIFIC GAS AND  
ELECTRIC COMPANY for Authority to  
Increase Revenue Requirements to Recover  
the Costs to Upgrade its SmartMeter™  
Program**

**(U 39 E)**

**Application 07-12-009  
(Filed December 12, 2007)**

**REVISED COMPLIANCE FILING OF PACIFIC GAS AND ELECTRIC COMPANY  
PURSUANT TO DECISION 09-03-026**

**SHIRLEY A. WOO**

**Pacific Gas and Electric Company  
77 Beale Street, B30A  
San Francisco, CA 94105  
Telephone: (415) 973-2248  
Facsimile: (415) 973-5520  
E-mail: [saw0@pge.com](mailto:saw0@pge.com)**

**Attorney for PACIFIC GAS AND ELECTRIC  
COMPANY**

**May 27, 2010**

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Pursuant to Ordering Paragraph 10 of Decision (D.) 09-03-026, Pacific Gas and Electric Company (PG&E) hereby files a revised 2010 PG&E Demand Response and Energy Conservation Annual Report (Report). The original Report was filed on April 30, 2010 in this docket. Subsequently, PG&E determined that discussion of Real-Time Pricing (RTP) rate had been omitted. PG&E also discovered that the subscription statistics total contained in Table 1 of the Report had been omitted. The revised Report attached to this pleading as Attachment A has been modified to include discussion of the RTP rate and the subscription statistics total in Table 1. As directed by the Commission in D.09-03-026, PG&E files this revised Report on the energy savings and associated financial benefits of all demand response, load control, and conservation programs enabled by PG&E's SmartMeter™ Program infrastructure.

Respectfully submitted,

By \_\_\_\_\_ /s/  
SHIRLEY A. WOO  
Pacific Gas and Electric Company  
77 Beale Street, B30A  
San Francisco, CA 94105  
Telephone: (415) 973-2248  
Facsimile: (415) 973-5520  
E-mail: [saw0@pge.com](mailto:saw0@pge.com)

Attorney for PACIFIC GAS AND ELECTRIC  
COMPANY

May 27, 2010

# **ATTACHMENT A**

PG&E 2009 Program Year  
Demand Response and Energy Conservation  
Annual Report

April 30, 2010<sup>1</sup>

**Pacific Gas and Electric Company**

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<sup>1</sup> Revised report, filed with the Commission on Thursday, May 27, 2010

## **Abstract**

Pursuant to Ordering Paragraph 10 of Pacific Gas and Electric Company's (PG&E) SmartMeter™ Upgrade Decision (D.09-03-026), PG&E has prepared this report which provides a review of PG&E's 2009 program year ex post load impacts, energy conservation, and financial benefits for the demand response and energy conservation programs enabled by PG&E's SmartMeter™ program, based on currently available data and methodology. The report provides a description of each program as well as the measurement methodology. As the future availability of data changes, and methodologies evolve and change over time, the information developed for and presented in future Demand Response and Energy Conservation Reports under Ordering Paragraph 10 of D.09-03-026 can be expected to evolve and change accordingly.

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## 1. Executive Summary

This report documents the 2009 program year ex post load impacts, energy conservation, and financial benefits for the PG&E SmartMeter™ program enabled demand response and energy conservation programs. The demand response programs that are or will be enabled by PG&E SmartMeter™ program include, but are not limited to, a Programmable Communicating Thermostat Program, the Peak Time Rebate Program, the Peak Day Pricing Rate, the Real Time Pricing Rate and Time-Of-Use Rates. The energy conservation programs that would benefit from the PG&E SmartMeter™ infrastructure are the Web Presentment of Interval Data, Home Area Networks, and the Tier Notifications Program.

Much of the energy savings and financial benefits attributable to the programs enabled by PG&E's SmartMeter™ infrastructure are expected to come in future years as SmartMeter™ meters are deployed and customers enroll in or are potentially defaulted into various programs. This report describes these programs, the measurement methods, and more.

This report is required by Ordering Paragraph 10 of PG&E's the SmartMeter™ Upgrade Decision (D.09-03-026) which—similar to reporting requirements for Southern California Edison Company in Decision 08-09-039—requires PG&E to report to the Commission:

*the energy savings and associated financial benefits of all demand response, load control, energy efficiency, and conservation programs enabled by advanced metering infrastructure (AMI), including programmable communicating thermostat (PCT) programs, Peak Time Rebate (PTR) programs, and other dynamic rates for residential customers.*

PG&E has worked with the Energy Division to develop a reporting format for this information. The Demand Response impact estimates contained herein are consistent with the Commission's adopted load impact protocols contained in Decision 08-04-050<sup>2</sup>.

## 2. Program Overview

There are seven PG&E SmartMeter™ program enabled demand response and energy conservation programs envisioned in the near-future or currently existing. The demand response programs are: (1) Programmable Communicating Thermostat (PCT) Program, (2) Peak-Time Rebate (PTR) Program, (3) Peak Day Pricing (PDP) Rate, (4) Real Time Pricing (RTP) Rate, and (5) Time-Of-Use (TOU) Rate. The energy conservation programs are: (6) Web Presentment of Interval Data, (7)

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<sup>2</sup> See D.08-04-050, Decision Adopting Protocols for Estimating Demand Response Load Impacts, April 24, 2008.



Home Area Network, and (8) Tier Notifications Program. A brief description and the current status for each program are described below.

### **2.1. Programmable Communicating Thermostat (PCT) Program**

Under the SmartMeter™ Upgrade filing Decision (D.09-03-026), PG&E is incorporating a Home Area Network (HAN) gateway device into advanced electric meters to support in-home HAN applications. Deployment of this technology will enable two-way communications with home appliances and automated controls (e.g., PCTs) which can communicate such data as temperature set points, event status, and customer overrides.

In PG&E's supplemental testimony (A.07-12-009), PG&E assumed new Title 24 building code air conditioning standards which included PCTs were expected in 2009. However, shortly after the application filing, the California Energy Commission withdrew its Title 24 building code air conditioning standards recommendation. Once programmable communicating thermostats are reinstated within Title 24, PG&E will assess opportunities to integrate such devices with its existing SmartAC program and/or other applicable or successor programs.

As stated in the recent SmartAC update application (A.09-08-018), the SmartAC Program plans to deploy devices that communicate bi-directionally via the HAN gateway as soon as the end-to-end system architecture is in place that allows new, compatible HAN-enabled AC direct load control devices to be purchased and deployed. PG&E anticipates these devices will be capable of receiving messaging and sending information via PG&E's Advanced Metering Infrastructure (AMI) network instead of the current one-way commercial paging network PG&E currently utilizes for its SmartAC program. Once the release of the Smart Energy 2.0 profile (standard) is defined, manufacturers will be able to build compatible devices and offer them in the retail market. PG&E will be able to evaluate and identify as applicable the devices which could be operated with PG&E's SmartMeter™ infrastructure. PG&E anticipates the release of this open standard in late 2010 with certified devices becoming available sometime in 2011. PG&E plans to select multiple hardware vendors to test product attributes and performance as well as customer satisfaction with these products, under various conditions. PG&E expects to make its preliminary hardware selections and begin testing devices sometime in late 2011.

Once internal systems are in place to support device and customer status tracking, data retrieval and reconciliation, and system operations and maintenance of HAN enabled two-way SmartAC devices, integration of the AMI compatible devices will be tested and a full deployment is expected to start in 2012.

SmartAC program enrollments are expected to continue through the current 2011 funding period when the program moves into maintenance mode. PG&E intends to apply for funds to continue deploying AC cycling devices in the 2012-2013 filing cycle. This will include available bi-directional technology. Thus, 2009 program enrollments, load impacts, energy conservation, and financial benefits associated with Title 24 and SmartAC SmartMeter™ program integration, are null. For the 2010 and 2011 program years, benefits are expected to have similar results.

## **2.2. Peak Time Rebate (PTR) Program**

On February 26<sup>th</sup>, 2010 PG&E filed a proposal with the Commission for a Peak Time Rebate (PTR) Program designed to encourage residential customers to reduce load by responding to pricing signals during PTR event periods. As directed by the Commission, PG&E has proposed a two-tier rate structure for customers with and without enabling technology. Under PG&E's proposed schedule, PTR will be available to eligible customers in a staged rollout beginning on May 1, 2011. The program will be available year-round and will be called on a day-ahead basis for a 5-hour period from 2:00 pm to 7:00 pm, on non-holiday weekdays. The program leverages the interval load data provided by an installed and operating PG&E SmartMeter™ meter by enabling a rebate program used during specified event hours.

PTR will provide a rebate on event days for demand reductions below a customer-specific reference level (CRL). The CRL is defined as the average 2 pm to 7 pm usage for the highest of 3 of 5 previous weekdays, excluding previous event days and holidays. In addition, PG&E has proposed a two-tier PTR incentive designed to encourage the use of enabling technologies. Customers with qualifying enabling technology (i.e., initially SmartAC participants) will earn a rebate of \$1.25/kWh during event hours. Customers without enabling technology will earn a rebate of \$0.75/kWh during event hours. Furthermore, PTR is included as the default rate option in PG&E's residential rate schedules. PTR and Peak day Pricing (PDP) events will be called on the same days based on the same operating criteria. Specifically, events will be called in the day ahead when forecast temperature in the day ahead equals or exceeds 98 degrees Fahrenheit (°F) for events on non-holiday weekdays and

105°F for events on holidays and weekends. Events may be called for either extremely high market prices or California Independent System Operator (CAISO) declared emergency conditions. Events will be called by 2 p.m. on the day before the event day.

PG&E submitted its PTR program in its 2010 Rate Design Window Application (A.10-02-028) and expects a final decision in late 2010.

### **2.3. Peak Day Pricing (PDP) Rate**

#### ***Residential customers***

In May 2008, PG&E began offering a critical peak pricing tariff known as SmartRate to residential and small and medium commercial customers in the Bakersfield and greater Kern County area. Starting in May 2009, enrollment expanded both in terms of the number of customers and the geographic regions covered as the SmartMeter™ program's deployment progressed. At the beginning of the 2009 program season, roughly 8,500 residential customers were enrolled in the program and by the end of September 2009; more than 22,000 customers were enrolled. At the time the April 1<sup>st</sup>, 2010 Load Impact Reports were produced<sup>3</sup> and the enrollments and load impacts were calculated, active enrollment equaled approximately 25,500 customers as of December 31, 2009 and the average per event, per customer 2009 program year ex post load impact was 0.31 kW.

The SmartRate pricing structure is an overlay on top of PG&E's standard tariff offerings. SmartRate pricing consists of an incremental charge that applies during the peak period on Smart Days and a per kilowatt-hour credit that applies for all other hours from June through September. For residential customers, the additional peak-period charge on Smart Days is 60¢/kWh, and applies between 2 pm and 7 pm. For non-residential customers, the incremental charge is 75¢/kWh and applies from 2 pm to 6 pm. Up to 15 Smart Days can be called during non-holiday weekdays from May 1st to October 31st. Residential SmartRate enrollment roughly doubled during the 2009 program year, increasing from approximately 8,500 in May to more than 21,000 by September. By the end of calendar year 2009, enrollment had reached over 25,000 accounts.

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<sup>3</sup> Stephen S. George, Ph.D., Josh Bode, M.P.P., Mike Perry, Ph.D., and Andrew Goett, Ph.D. (Freeman, Sullivan & Company), 2009 Load Impact Evaluation for Pacific Gas and Electric Company's Residential SmartRate™ — Peak Day Pricing and TOU Tariffs and SmartAC Program, Volume 2: Ex Ante Load Impacts (filed April 1, 2010);

PG&E will continue to market SmartRate to residential customers through the first half of 2010. Based on the decision on PG&E's Peak Day Pricing (PDP) proposal,<sup>4</sup> SmartRate will no longer be available starting in 2011. The current SmartRate option available to residential customers will remain in effect until February 2011, at which time SmartRate customers will be moved to the new residential PDP rate unless the customer opts out to a non-time differentiated residential tiered rate. There will be between 9 and 15 PDP event days per calendar year. All customers that are defaulted to, or choose, PDP rate will be afforded bill protection for the first year, unless they choose to waive such protection.

The PDP tariff option approved by the CPUC is an overlay on tariff E1, and has a relatively high peak period price on PDP days and a very small price differential between peak and off-peak prices on other weekdays. Although it has time-varying pricing on all weekdays, because of the very modest price differential on non-PDP days, the effective price signals associated with PDP are quite similar to SmartRate, which did not have time-varying pricing on days other than event days.

#### *Non-residential customers*

On February 27, 2009, PG&E proposed the new event-based dynamic pricing Program, Peak Day Pricing (PDP)<sup>5</sup>, that over the next two years would replace Critical Peak Pricing for non-residential customers. Unless the customer opts out, PDP rates will become the default rates for every PG&E (1) large commercial and industrial customer beginning May 2010, (2) small and medium commercial and industrial (C&I) business customer that has had an electric SmartMeter<sup>TM</sup> meter for twelve months beginning November 2011, and (3) large agricultural customers beginning February 2011. CPUC Decision 10-02-032 (February 25, 2010) adopted most of the PDP rates PG&E proposed and changed part of the schedule for implementing the rates. After a non-residential small and medium C&I customer becomes eligible to default to the new PDP rates, the flat, non-time differentiated rates will no longer be available to the customer. If a customer that enrolls in PDP rates chooses bill stabilization, the annual electric bill for the first 12 months the non-residential customer is on those PDP rates will not exceed the annual bill that customer would have been charged under the otherwise applicable rate for

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<sup>4</sup> CPUC Decision 10-02-032. Decision on Peak Day Pricing for Pacific Gas and Electric Company. February 25, 2010 (Issued 3/2/10). A 09-02-022.

<sup>5</sup> Application (A.) 09-02-022, Application of Pacific Gas and Electric Company for Approval of its 2009 Rate Design Window Proposals for Dynamic Pricing and Recovery of Incremental Expenditures Required for Implementation (February 27, 2009)

that customer. On May 1, 2010, small and medium agricultural and C&I customers with SmartMeter™ meters that are interval-billed enabled will be allowed to enroll voluntarily in year round PDP rates (as well as time-of-use (TOU) rates during non-PDP pricing periods).

On November 1, 2011, year-round PDP rates (plus TOU rates during non-PDP event hours) will become the default rates for small and medium non-residential C&I customers that are not already enrolled in another DR program and that have had an interval-billed electric SmartMeter™ meters for at least 12 months, unless customers notify PG&E within 45 days and request to be placed on the otherwise applicable TOU rate. On May 1, 2010, year-round PDP rates will become the default rate for large non-residential C&I customers that are not already enrolled in another DR program.

#### **2.4. Real Time Pricing (RTP) Rate**

PG&E recently filed its RTP rate proposal with the Commission (A.10-03-014) in which a new voluntary RTP tariff option was proposed for all customer classes<sup>6</sup>, beginning on May 1, 2012 under PG&E's proposed case schedule or 12 months after a final Commission decision on PG&E's RTP rate and cost recovery proposals, whichever occurs later. PG&E's RTP tariff proposal and proposed framework for RTP program implementation have been formulated with the goal of meeting Commission directives expressed in the Commission's original dynamic pricing policy decision (D.08-07-045).

Although all customer classes are eligible, RTP rates will not be offered under special-purpose rate classifications such as streetlight and standby tariffs, nor will RTP be offered by PG&E for Direct Access, Community Choice Aggregation, master meter or Net Energy Metering program customers. PG&E estimates that no more than 5,000 to 10,000 RTP participants will enroll during the course of the 2011 General Rate Case (GRC) cycle.

PG&E's proposed RTP rates are based on a "one-part tariff" approach—hourly price adjustments will apply to a customer's entire hourly load (as opposed to a "two-part" RTP tariff in which hourly charges or credits are applied only to incremental deviations above or below a predetermined customer-specific baseline load profile). RTP energy charges would be "indexed" to the California Independent System Operator's (CAISO's) day-ahead hourly

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<sup>6</sup> Large Commercial and Industrial Customers; Medium Business Customers; Small Business Customers; Large Agricultural Customers; Small Agricultural Customers, and; Residential Service Customers

market<sup>7</sup> prices. Initial RTP rates would be based on day-ahead hourly CAISO prices that are aggregated across PG&E's whole service territory. PG&E proposed that neither "bill protection" and "bill stabilization" nor capacity reservation features need be offered under the new RTP tariffs.

### **2.5. Time-Of-Use (TOU) Rate**

PG&E has had a traditional TOU tariff in place for many years. The E7 tariff is a two-period, five-tier tariff. The peak period for the E7 tariff is from noon to 6 pm on weekdays, with off-peak prices in effect at all other times. The peak period is the same the entire year. The E7 rate has been closed to new customers since 2007. It was replaced by the E6 tariff, which is a three-period, five-tier TOU rate. With the E6 tariff, the peak period is from 1 pm to 7 pm in the summer months. The partial peak period in the summer is from 10 am to 1 pm and 7 pm to 9 pm, Monday through Friday and from 5 pm to 8 pm on Saturdays and Sundays. In the winter, peak period prices do not apply, and partial peak prices occur from 5 pm to 8 pm on weekdays only.

A substantial number of E6 and E7 customers are net metered. Net metered customers typically have very different load patterns compared with standard metered customers, as they very often have solar power or some other form of distributed generation.

Approximately 16% of E7 customers and 81% of E6 customers are net metered. PG&E has no plans to market TOU rate E6 actively, focusing instead on the higher impact SmartRate and PDP tariffs. The annual attrition rate is 3.39% (based on a review of attrition rates for customers on the tariff in 2008 and 2009).

The August 1st, 2008 decision (D.08-07-045) issued by the CPUC adopted a tentative timetable for PG&E to implement time- and seasonally-differentiated year-round time of use (TOU) rates for non-residential small and medium C&I customers (i.e., demands less than 200 kW). As part of PG&E's 2009 Rate Design Window Proposal for Dynamic Pricing (A.09-02-022 filed on February 27, 2009), PG&E proposed a set of TOU rates for non-residential small and medium C&I customers. Customers on a TOU rates also may participate in PDP. In these cases, in addition to paying TOU rates, customers on a PDP rate would pay surcharges over TOU rates for usage during PDP event hours and receive credits against TOU rates for usage in nonevent hours.

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<sup>7</sup> This CAISO market became publicly available to all California market participants starting on April 1, 2009 with implementation of Phase 1 of the CAISO Market Redesign and Technology Upgrade (MRTU) process, referred to herein as "day-ahead hourly ISO prices"

CPUC Decision 10-02-032 (February 25, 2010) adopted most of the TOU rates PG&E proposed. Effective May 1, 2010, small and medium agricultural and C&I customers with interval-billed SmartMeter™ meters will be allowed to enroll voluntarily in year-round TOU rates. On February 1, 2011, TOU rates will become the default rates for every PG&E small and medium C&I customer that has had an electric SmartMeter™ meter and interval data for twelve months. The flat, non-time differentiated rates will no longer be available to these customers.

## **2.6. Web Presentment of Interval Data**

The Web Presentment of Interval Data will provide online access to interval usage data and analysis tools tailored to both commercial and residential customers with PG&E SmartMeter™ meters. PG&E plans to provide customers with interactive next-day access to interval usage data collected by the PG&E SmartMeter™ system, as well as 13-month historical energy usage. The daily refreshed interval usage, as well as program information will be provided through integration with the back office systems.

The internal usage data presented on PG&E's web portal is designed to help PG&E's customers better understand their energy consumption and thereby reduce their energy usage. As the SmartMeter™ project rollout is completed, sometime in early 2012, all PG&E customers with an installed and operating SmartMeter™ meters will have access to Web Presentment of Interval Data. As the availability of Web Presentment of Interval Data grows, PG&E intends to commission a study to evaluate the effects of access to SmartMeter™ data on energy conservation and energy savings.

## **2.7. Home Area Network (HAN)**

Under the SmartMeter™ Upgrade filing (D.09-03-026), PG&E is incorporating a Home Area Network (HAN) gateway device into advanced electric meters. The HAN gateway will enable a network within a customer's premise that connects and facilitates communication between smart devices. For customers who employ a HAN enabled In-Home Display (IHD), energy management system (EMS) or other similar technology, HAN devices will provide customers with near real time consumption and pricing information. This information will give customers the ability to monitor or automate their home energy usage to balance between comfort and cost.

The industry is currently developing a communication standard, Smart Energy 2.0, to ensure that HAN device communications are reliable, secure, and protect customer privacy. Based

on the current timeline, PG&E anticipates standards compliant HAN products to be available in the market in the 2011 timeframe.

In anticipation of this market, PG&E is currently developing the foundational processes and systems to support HAN for residential and small and medium business customers who procure a device via the retail market and register the device to receive information from PG&E. PG&E is engaging with standards compliant vendors in its lab and will continue to evaluate HAN display devices that are working towards meeting the Smart Energy 2.0 standard..

## **2.8. Tier Notifications Program**

The Tier Notifications Program (or “Energy Alerts Program”) will provide residential PG&E SmartMeter™ program enabled customers with notification that they have left (or are close to leaving) one tier and have progressed (or are close to progressing) to the next rate tier, which will result in a higher price per kWh. The Tier Notifications Program will indicate a movement to a higher residential usage tier level. Notifications will be automated and are planned to include various options, such as text message, e-mail or automated phone call. The Tier Notifications Program will likely result in improving customer’s energy consumption awareness, and thus, increase energy conservation efforts.

If customers choose to participate in the Energy Alerts program, starting on the eighth day of their billing cycle, PG&E will automatically calculate the customer’s electric use for that billing period. PG&E will determine whether to send a customer an alert based on the amount of electricity they have used to date. The alerts will inform customers if they are projected to move into the higher-priced tiers (Tiers 3, 4 and 5) by the end of their billing period, and will let them know once they actually have.

The frequency at which a customer receives Energy Alerts is dependent on how much electricity the customer uses during the billing period. Customers will receive no more than four messages per service agreement in any given billing period, generally between the 8th and the 25th day of the billing period.

To receive Energy Alerts, a customer must have a SmartMeter™ electric meter installed and must be activated on the SmartMeter™ system. Activation typically takes approximately two billing cycles after installation. If a customer has a newly installed meter, the customer will receive a Welcome Booklet when the customer becomes activated on the SmartMeter™



system. Customers must be an active residential PG&E account holder on a standard tiered electric rate schedule (such as E-1 or EL-1).

To sign up for Energy Alerts by text message, e-mail or automated phone call, customers may log in or sign up through the “My Account” online web portal. Additionally, customers may call PG&E through a toll-free telephone number to sign up. Customers may change their notification preferences or stop receiving alerts at any time.

### **3. PG&E SmartMeter™ Program Enabled Demand Response Programs**

The PCT, PTR, PDP, RTP and TOU programs enabled by the SmartMeter™ infrastructure will encourage PG&E customers to reduce loads during periods in which demand might outstrip supply. The reported demand response will be equal to the number of enrolled service accounts multiplied by the per-customer demand response load impacts by program.

Table I within this report provides the number of participating service accounts, estimated demand response (MW), energy savings (MWh), and financial benefits (in thousands) associated with the PG&E SmartMeter™ project enabled demand response programs. The following sections describe the measurement methods and assumptions used in developing the demand response results.

#### **3.1. Service Accounts**

During the PG&E SmartMeter™ deployment period, the number of service accounts available for program participation will be dependant on a billing-ready PG&E SmartMeter™ meter. A billing-ready PG&E SmartMeter™ meter is defined as a meter which has been installed, communicating, tested, cut-over to operations to allow for billing using interval data. Meter installations will occur throughout the deployment period. In 2009, PG&E had 25,500 active enrollments which included customers both with SmartMeter™ program billing and enrollment in SmartRate. For the 2009 program year, there were no service accounts enrolled in the PCT, PTR, PDP, or TOU programs. Specific information regarding the service account enrollments is discussed below.

PCT Program. Residential service accounts enrolled in the PCT program will also require a working PCT device. A working PCT device is defined as a PCT which has been installed, tested, registered with PG&E, and properly communicating. PCT program service accounts will be determined by the number of sites with registered PCT devices.

PTR Program. Upon meter installation, testing, and cutover to operations, most residential customers will be automatically enrolled in the PTR program as dictated by the rollout schedule detailed within PG&E's recently filed Peak Time Rebate application<sup>8</sup>. PTR program service accounts will be determined by the number of PTR program enrollments.

PDP Rate. Service accounts enrolled in the PDP rate include residential, C&I and agriculture service accounts that have opted into the PDP rate. The PDP service accounts may also include those service accounts that participate in a SmartMeter<sup>TM</sup> project enabled PCT program. PDP service accounts will be determined by the rate enrollments.

RTP Rate. Service accounts enrolled in the RTP rate include residential, C&I and agriculture service accounts that have opted into the voluntary RTP rate.. RTP service accounts will be determined by the rate enrollments.

TOU Rate. Service accounts enrolled in the TOU rate include residential, small and medium C&I (less than 200 kW), and small and medium agriculture customers (less than 200 kW) that have opted into the TOU rate. TOU service accounts will be determined by the rate enrollments.

### **3.2. Demand Response**

The calculated demand response load impacts will be estimated based on the number of end-of-year participating service accounts and the load impacts for each program. The load impacts will be based on an analysis of the demand response events which occurred during the calendar year ("ex post"), in a manner consistent with the Load Impact Protocols approved in D.08-04-050. The analysis may incorporate a number of variables including the location of customers by CASIO-defined local capacity areas, weather zones, and customer types. PG&E expects to perform a load impact analysis for all SmartMeter<sup>TM</sup> program enabled demand response resources. The protocols require that plans be developed for load impact evaluations for each program and submitted to the Demand Response Measurement

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<sup>8</sup> Application 10-02-028, Pacific Gas and Electric Company 2010 Rate Design Window, Prepared Testimony (February 26, 2010)

and Evaluation Committee (DRMEC) prior to execution. Detailed load impact evaluation plans have yet to be developed for the following new programs:

- PCT
- PTR (technology enabled and non-technology enabled)
- PDP (residential, C&I less than 20 kW, C&I 20 to 200 kW, Agriculture less than 200 kW)
- RTP
- TOU (residential, C&I less than 200 kW, and agriculture customers less than 200 kW)

Participation in some of PG&E's SmartMeter™ project enabled demand response programs will begin in 2010. For those programs, PG&E anticipates performing the above load impact studies to support its 2011 annual report. A suitable evaluation plan will be developed once the magnitude and nature of the enrolled population becomes clear. It is anticipated that impacts for most of these resources will vary geographically, based on differences in climate and customer characteristics and, therefore, these factors will be taken into account during program evaluation.

### **3.3. Energy Savings**

Annual energy savings associated with the SmartMeter™ project enabled demand response programs will be estimated based on results from the ex post load impact analysis for each program.

### **3.4. Financial Benefits**

Financial benefits will be calculated by adding financial benefits associated with the demand reduction and the energy savings for each program. The demand reduction financial benefits will be calculated by multiplying the demand response times the most recently accepted avoided generation capacity cost. PG&E's most recent adopted avoided marginal generation capacity cost was \$84/kW-year and was adopted as part of PG&E's 2007 GRC Phase 2. PG&E recently filed its 2011 GRC Phase 2 avoided marginal generation capacity costs on March 22, 2010. Once the Commission adopts new values for the avoided marginal generation capacity costs in this proceeding, PG&E will use those adopted values to quantify the financial benefits in the annual report. The conservation financial benefits will be

calculated by multiplying the energy savings times the most recently authorized measure of energy costs appropriate for the program's characteristics.

To the extent that the Commission requires different (than those indicated above) marginal generation costs to be used for various programs, PG&E will use the most recently adopted values to calculate the financial benefits.

#### 4. **PG&E SmartMeter™ Project Enabled Energy Conservation Programs**

The PG&E SmartMeter™ program enabled Web Presentment of Interval Data, Home Area Network, and Tier Notifications Program will provide information on energy conservation. The energy impacts of these programs will be measured according to the guidelines presented in the California Energy Efficiency Evaluation Protocols<sup>9</sup>. Program evaluators will identify evaluation objectives and determine which protocol and level of rigor is appropriate for the SmartMeter™ project enabled programs.

Table II, located at the end of this report, provides the service accounts, energy conservation (MWh), demand response (MW), and financial benefits (in thousands) associated with the PG&E SmartMeter™ project enabled energy conservation programs on an ex-post basis. The following sections describe the measurement methods and assumptions used in developing the energy conservation results.

##### 4.1. **Service Accounts**

During the PG&E SmartMeter™ deployment period, the number of service accounts will be dependent on a billing ready PG&E SmartMeter™ meter. A billing ready PG&E SmartMeter™ meter is defined as a meter which has been installed, communicating, tested, and cut-over to operations to allow for billing using interval data. Meter installations will occur throughout the deployment period. In 2009, there were no meter installations which included customers participating in the Home Area Network and Tier Notifications Programs. There were approximately 25,500 service accounts enrolled in PG&E's SmartRate program; as part of their enrollment in this demand response program, these customer could participate in the Web Presentment of Interval Data. The SmartRate/PDP program is expected to grow as the SmartMeter™ program is rolled out and customers receive new SmartMeter™ electric

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<sup>9</sup> California Energy Efficiency Evaluation Protocols, prepared for the California Public Utilities Commission, April 2006.

meters. PG&E plans to submit an evaluation research plan to study the effects of web presentation of interval data as the SmartMeter™ and SmartRate/PDP programs grow.

Web Presentation of Interval Data. All PG&E SmartMeter™ program enabled service accounts will have next day access to their interval usage data, as well as 13-month historical energy usage through the portal. However, only a subset of these customers will access their usage data. Web Presentation of Interval Data service accounts will be calculated based on the number of customers who sign-up and access the interval data available on PG&E's web site.

Home Area Network. Home Area Network service accounts will be determined based on the number of devices (e.g., In-Home Displays) registered with PG&E. The Home Area Network program may include but is not limited to the (1) building integrated graphical display (new construction and existing homes), (2) dedicated handheld graphical display, and (3) PC based graphical display.

Tier Notifications Program. No Tier Notifications program existed in program year 2009; however, customers may enroll in the Tier Notifications program for Summer 2010.

#### **4.2. Energy Conservation**

Energy conservation will be estimated using the number of service accounts and an energy savings study for each program. The energy savings study will be an ex-post statistical analysis which will incorporate differences in weather zones, geography, and other factors, as appropriate. An energy savings analysis will be performed for each energy conservation program. Participation in PG&E's behavior-based programs will begin in late 2010 or early 2011. Experimental design will be used to measure the amount of conservation enabled solely by SmartMeter™ program and the energy savings derived solely from the behavior-based program, per CPUC Decision 10-04-029.

#### **4.3. Demand Reduction**

The methods used to estimate load impacts associated with PG&E SmartMeter™ Project Enabled Energy Conservation Programs will be conceptually similar to those described above for PG&E SmartMeter™ Project Enabled Demand Response Programs. That is, they will be developed in conformance with the CPUC Load Impact Protocols and will rely on statistical analysis of usage data for suitable groups of customers. Given the nature of these programs, it may be necessary to draw samples from both participating and non-participating customers

and ideally to obtain usage information before and after customers participate in the program. Detailed plans can be provided once the nature of the participant population is known.

**4.4. Financial Benefits**

Financial benefits will be calculated using the same methodology as the demand response financial benefits described previously.

**5. 2008 Demand Response and Energy Conservation Results**

Tables I and II, located in the following pages, provide the 2009 program year demand response and energy conservation results. Because the majority of these programs are either in their early stages or not yet initiated, the 2009 program enrollments, load impacts, energy conservation, and financial benefits are either zero or near-zero for these SmartMeter™ project enabled programs.

**Table I**  
**PG&E SmartMeter™ Project Enabled Demand Response Programs**  
**Subscription Statistics**  
**December 31, 2009**

Program	Service Accounts <sup>10</sup>	Demand Reduction (MW)		Energy Savings (MWh)		Total Financial Benefits (thousands)
		Load Impact <sup>11</sup>	Financial Benefits <sup>12</sup> (thousands)	Energy Savings <sup>13</sup>	Financial Benefits <sup>14</sup> (thousands)	
<b>Demand Response</b>						
PCT	0 <sup>15</sup>	0	\$0	0	\$0	\$0
PTR	0 <sup>16</sup>	0	\$0	0	\$0	\$0
SmartRate/PDP	25,500 <sup>17</sup>	7.91	\$664.02	0	\$0	\$0
RTP	0 <sup>18</sup>	0	\$0	0	\$0	\$0
TOU	0 <sup>19</sup>	0	\$0	0	\$0	\$0
<b>Total</b>	<b>25,500</b>	<b>7.91</b>	<b>\$664.02</b>	<b>0</b>	<b>\$0</b>	<b>\$0</b>

<sup>10</sup> As of December 31, 2009, there were no service accounts enrolled in all programs with the exception of the current SmartRate program.

<sup>11</sup> Program MWs equal the sum of each enrolled participant's interruptible/curtailable load defined as follows:

- PCT: Number of PCT service accounts x estimated average PCT load impact per customer, from Annual Load Impact Analysis Report.
- PTR: Number of PTR service accounts x estimated average PTR load impact per customer, from Annual Load Impact Analysis Report.
- SmartRate/PDP: Number of SmartRate/PDP service accounts x estimated average SmartRate/PDP load impact per customer (see Section 2.1 "SmartRate Program Overview" and Section 3.2 "Load Impact Results" of the Annual Load Impact Analysis Report filed April 1, 2010). Includes residential, and small and medium C&I less than 200 kW.
- TOU: Number of TOU service accounts x estimated average TOU load impact per customer, from Annual Load Impact Analysis Report. Includes residential and small and medium C&I less than 200 kW.

<sup>12</sup> Financial benefits (in thousands of dollars) = total DR load reduction (kW) x accepted avoided marginal generation capacity costs per kW-year.

<sup>13</sup> Energy savings will be calculated based on the results of the Annual Load Impact Analysis for each program.

<sup>14</sup> Financial benefits = energy savings (kWh) x avoided generation energy costs (in thousands of dollars).

<sup>15</sup> Number of residential service accounts enrolled in PCT program who have (1) a billing ready PG&E SmartMeter™ meter (installed, communicating, and cut-over to operations to allow for billing using interval data), and (2) a working PCT device (installed, registered, and communicating). For customers that are both on PDP with an SmartMeter-enabled PCT, their MWs and service accounts are included in PDP rate subscription statistics.

<sup>16</sup> Number of PTR service accounts that have a billing ready PG&E SmartMeter™ meter (installed, communicating, and cut-over to operations).

<sup>17</sup> Number of residential and small and medium C&I (< 200 kW) service accounts enrolled in SmartRate/PDP (see Section 2.1 "SmartRate Program Overview" filed April 1, 2010) who have a billing ready PG&E SmartMeter™ meter (installed, communicating, and cut-over to operations to allow for billing using interval data). For customers that are both on SmartRate/PDP with a SmartMeter™ program enabled PCT, their MWs and service accounts are included in SmartRate/PDP rate subscription statistics.

<sup>18</sup> Number of eligible service accounts enrolled in PTR who have a billing ready PG&E SmartMeter™ meter (installed, communicating, and cut-over to operations to allow for billing using interval data).

<sup>19</sup> Number of residential and small and medium C&I (< 200kW) service accounts enrolled in TOU who have a billing ready PG&E SmartMeter™ meter (installed, communicating, and cut-over to operations to allow for billing using interval data).

**Table II**  
**PG&E SmartMeter™ Project Enabled Energy Conservation Programs**  
**Subscription Statistics**  
**December 31, 2009**

<b>Program</b>	<b>Service Accounts<sup>20</sup></b>	<b>Energy Savings (MWh)</b>		<b>Demand Reduction (MW)</b>		<b>Total Financial Benefits (thousands)</b>
		<b>Energy Savings<sup>21</sup></b>	<b>Financial Benefits<sup>22</sup> (thousands)</b>	<b>Load Impacts (MW)<sup>23</sup></b>	<b>Financial Benefits<sup>24</sup> (thousands)</b>	
<b>Energy Conservation</b>						
Web Presentment of Interval Data	0 <sup>25</sup>	0	\$0	0	\$0	\$0
Home Area Network	0 <sup>26</sup>	0	\$0	0	\$0	\$0
Tier Notifications Program	0 <sup>27</sup>	0	\$0	0	\$0	\$0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>\$0</b>	<b>0</b>	<b>\$0</b>	<b>\$0</b>

<sup>20</sup> As of December 31, 2009, there were no service accounts enrolled in these programs.

<sup>21</sup> Program conservation MWhs are reported consistent with Energy Efficiency M&E Protocols. The study supporting PG&E's conservation estimates in future years will be available upon request.

<sup>22</sup> Financial benefits = energy savings (kWh) x avoided generation energy costs (in thousands of dollars).

<sup>23</sup> Demand reductions for the energy conservation programs will be calculated based upon an analysis consistent with that required by the Energy Efficiency Measurement and Evaluation Protocols.

<sup>24</sup> Financial benefits (in thousands of dollars) = total load reduction (kW) x accepted marginal avoided generation capacity costs per kW-year.

<sup>25</sup> Number of Web Presentment of Interval Data service accounts will be calculated based on number of customer sign-ups for access to interval data on SCE's web site.

<sup>26</sup> Number of Home Area Network (HAN) service accounts will be determined based on number of devices registered with PG&E's HAN program.

<sup>27</sup> Number of Tier Notifications Program service accounts will be determined by the number of program enrollments.



CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105.

On May 27, 2010, I served a true copy of:

**REVISED COMPLIANCE FILING OF  
PACIFIC GAS AND ELECTRIC COMPANY PURSUANT TO  
DECISION 09-03-026 – A. 07-12-009**

- [XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service lists for A. 07-12-009 with an e-mail address.
  
- [XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service lists for A.07-12-009 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 27<sup>th</sup> day of May, 2010, at San Francisco, California.

\_\_\_\_\_  
/s/  
PAMELA J. DAWSON-SMITH

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
EMAIL SERVICE LIST**

Last Updated: May 14, 2010

**CPUC DOCKET NO. A0712009**

ag2@cpuc.ca.gov;agc@cpuc.ca.gov;bfinkelstein@turn.org;bkc7@pge.com;bschuman@pacific-crest.com;bsk@cpuc.ca.gov;case.admin@sce.com;cem@newsdata.com;chris@emeter.com;cjb@cpuc.ca.gov;cjw5@pge.com;CManson@SempraUtilities.com;ctd@cpuc.ca.gov;dbyers@landuselaw.com;dkf@cpuc.ca.gov;DNG6@pge.com;ericd@silverspringnet.com;janet.combs@sce.com;jeff.francetic@landisgyr.com;jmrb@pge.com;julien.dumoulin-smith@ubs.com;KAF4@pge.com;kkm@cpuc.ca.gov;mjd@cpuc.ca.gov;mrw@mrwassoc.com;nsuetake@turn.org;pfa@cpuc.ca.gov;pforkin@daystartech.com;regrelcpuccases@pge.com;rhd@cpuc.ca.gov;rmason@rwbaird.com;rogerl47@aol.com;RPrince@SempraUtilities.com;rrh3@pge.com;rschmidt@bartlewells.com;sandi@emfsafetynetwork.org;saw0@pge.com;scl@cpuc.ca.gov;service@spurr.org;rovetti@sflower.org;SWF5@pge.com;tburke@sflower.org;tcr@cpuc.ca.gov;theresa.mueller@sfgov.org;wharrison@rwbaird.com;william.sanders@sfgov.org;wtr@cpuc.ca.gov;zango@zimmerlucas.com;

# THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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## CPUC DOCKET NO. A0712009

Total number of addressees: 50

DIONNE ADAMS OPERATION REVENUE  
REQUIREMENTS DEPT  
**PACIFIC GAS AND ELECTRIC COMPANY**  
77 BEALE ST., MAIL CODE B9A  
SAN FRANCISCO CA 94105  
FOR: Pacific Gas and Electric Co.  
Email: DNG6@pge.com  
Status: INFORMATION

KAREN FORSGARD  
**PACIFIC GAS AND ELECTRIC COMPANY**  
77 BEALE ST., MC B8Q  
SAN FRANCISCO CA 94105  
FOR: Pacific Gas and Electric Co.  
Email: KAF4@pge.com  
Status: INFORMATION

RONALD HELGENS  
**PACIFIC GAS AND ELECTRIC COMPANY**  
245 MARKET ST, MC N12G  
SAN FRANCISCO CA 94105  
FOR: Pacific Gas and Electric Co.  
Email: rrh3@pge.com  
Status: INFORMATION

CHRISTOPHER J. WARNER  
**PACIFIC GAS AND ELECTRIC COMPANY**  
77 BEALE ST  
SAN FRANCISCO CA 94105  
FOR: Pacific Gas and Electric Co.  
Email: cjw5@pge.com  
Status: INFORMATION

BRIAN K. CHERRY  
**PACIFIC GAS & ELECTRIC COMPANY**  
77 BEALE ST., 1093, PO BOX 770000, MCB10C  
SAN FRANCISCO CA 94177  
FOR: Pacific Gas and Electric Co.  
Email: bkc7@pge.com  
Status: PARTY

Andrew Campbell  
**CALIF PUBLIC UTILITIES COMMISSION**  
EXECUTIVE DIVISION  
505 VAN NESS AVE RM 5203  
SAN FRANCISCO CA 94102-3214  
Email: agc@cpuc.ca.gov  
Status: STATE-SERVICE

David K. Fukutome  
**CALIF PUBLIC UTILITIES COMMISSION**  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
505 VAN NESS AVE RM 5042  
SAN FRANCISCO CA 94102-3214  
Email: dkf@cpuc.ca.gov  
Status: STATE-SERVICE

CASE COORDINATION  
**PACIFIC GAS AND ELECTRIC COMPANY**  
PO BOX 770000; MC B9A  
SAN FRANCISCO CA 94177  
FOR: Pacific Gas and Electric Co.  
Email: regrelcpuccases@pge.com  
Status: INFORMATION

STEVEN W. FRANK LAW DEPARTMENT  
**PACIFIC GAS AND ELECTRIC COMPANY**  
PO BOX 770000, MAIL CODE B30A  
SAN FRANCISCO CA 94177  
FOR: Pacific Gas and Electric Co.  
Email: SWF5@pge.com  
Status: INFORMATION

LARRY NIXON  
**PACIFIC GAS AND ELECTRIC COMPANY**  
77 BEALE ST, MC B10A  
SAN FRANCISCO CA 94105  
FOR: Pacific Gas and Electric Co.  
Status: INFORMATION

SHIRLEY A. WOO  
**PACIFIC GAS AND ELECTRIC COMPANY**  
77 BEALE ST / PO BOX 7442  
SAN FRANCISCO CA 94120-7442  
FOR: Pacific Gas and Electric Co.  
Email: saw0@pge.com  
Status: INFORMATION

J. MICHAEL REIDENBACH LAW DEPARTMENT  
**PACIFIC GAS AND ELECTRIC COMPANY**  
PO BOX 7442  
SAN FRANCISCO CA 94120  
FOR: Pacific Gas and Electric Co.  
Email: jmrb@pge.com  
Status: PARTY

Matthew Deal  
**CALIF PUBLIC UTILITIES COMMISSION**  
POLICY & PLANNING DIVISION  
505 VAN NESS AVE RM 5119  
SAN FRANCISCO CA 94102-3214  
Email: mjd@cpuc.ca.gov  
Status: STATE-SERVICE

Aloke Gupta  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
Email: ag2@cpuc.ca.gov  
Status: STATE-SERVICE

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Bruce Kaneshiro  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
Email: bsk@cpuc.ca.gov  
Status: STATE-SERVICE

Karl Meeusen  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
Email: kkm@cpuc.ca.gov  
Status: STATE-SERVICE

Thomas Roberts  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY PRICING AND CUSTOMER PROGRAMS  
BRANCH  
505 VAN NESS AVE RM 4104  
SAN FRANCISCO CA 94102-3214  
Email: tcr@cpuc.ca.gov  
Status: STATE-SERVICE

DAVID J. BYERS  
**MCCRACKEN & BYERS, LLP**  
1920 LESLIE ST  
SAN MATEO CA 94403-1325  
FOR: California City-County Street Light Association  
Email: dbyers@landuselaw.com  
Status: PARTY

WILLIAM SANDERS  
**CITY AND COUNTY OF SAN FRANCISCO**  
CITY HALL, RM. 234  
1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO CA 94102  
FOR: City and County of San Francisco  
Email: william.sanders@sfgov.org  
Status: PARTY

Paul Angelopulo  
**CALIF PUBLIC UTILITIES COMMISSION**  
LEGAL DIVISION  
505 VAN NESS AVE RM 4107  
SAN FRANCISCO CA 94102-3214  
FOR: Division of Ratepayer's Advocates  
Email: pfa@cpuc.ca.gov  
Status: PARTY

Christopher J. Blunt  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY PRICING AND CUSTOMER PROGRAMS  
BRANCH  
505 VAN NESS AVE RM 4209  
SAN FRANCISCO CA 94102-3214  
FOR: DRA  
Email: cjb@cpuc.ca.gov  
Status: STATE-SERVICE

Scarlett Liang-Uejio  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
Email: scl@cpuc.ca.gov  
Status: STATE-SERVICE

Rashid A. Rashid  
**CALIF PUBLIC UTILITIES COMMISSION**  
LEGAL DIVISION  
505 VAN NESS AVE RM 4107  
SAN FRANCISCO CA 94102-3214  
Email: rhd@cpuc.ca.gov  
Status: STATE-SERVICE

REED V. SCHMIDT  
**BARTLE WELLS ASSOCIATES**  
1889 ALCATRAZ AVE  
BERKELEY CA 94703-2714  
FOR: California City-County Street Light Association  
Email: rschmidt@bartlewells.com  
Status: INFORMATION

**CALIFORNIA ENERGY MARKETS**  
425 DIVISADERO ST., STE 303  
SAN FRANCISCO CA 94117  
Email: cem@newsdata.com  
Status: INFORMATION

PATRICK J. FORKIN III, CPA VP-CORPORATE  
DEVELOPMENT  
**DAYSTAR TECHNOLOGIES**  
2972 STENDER WAY  
SANTA CLARA CA 95054  
Email: pforkin@daystartech.com  
Status: INFORMATION

Christopher Danforth  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY PRICING AND CUSTOMER PROGRAMS  
BRANCH  
505 VAN NESS AVE RM 4209  
SAN FRANCISCO CA 94102-3214  
FOR: DRA  
Email: ctd@cpuc.ca.gov  
Status: INFORMATION

Rebecca Tsai-Wei Lee  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
FOR: DRA  
Email: wtr@cpuc.ca.gov  
Status: STATE-SERVICE

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## CPUC DOCKET NO. A0712009

Total number of addressees: 50

CHRIS KING CHIEF STRATEGY OFFICER  
**EMETER STRATEGIC CONSULTING**  
2215 BIDGEPOINTE PARKWAY, STE 300  
SAN MATEO CA 94404  
FOR: eMeter  
Email: chris@emeter.com  
Status: INFORMATION

DENNIS J. HERRERA  
**CITY AND COUNTY OF SAN FRANCISCO**  
CITY HALL, RM 234  
SAN FRANCISCO CA 94102  
FOR: Intervenors, City & County of S.F.  
Status: INFORMATION

ROGER LEVY  
**LEVY AND ASSOCIATES**  
2805 HUNTINGTON ROAD  
SACRAMENTO CA 95864  
Email: rogerl47@aol.com  
Status: INFORMATION

JULIE DUMOULIN-SMITH ASSOCIATE ANALYST  
**NATURAL GAS & ELECTRIC UTILITIES GROUP**  
1285 AVE. OF THE AMERICAS  
NEW YORK NY 10019  
Email: julien.dumoulin-smith@ubs.com  
Status: INFORMATION

**R.W. BAIRD & CO.**  
2525 WEST END AVE  
NASHVILLE TN 37203  
Email: rmason@rwbaird.com  
Status: INFORMATION

CAROL MANSON  
**SAN DIEGO GAS & ELECTRIC CO.**  
8330 CENTURY PARK COURT CP32D  
SAN DIEGO CA 92123-1530  
FOR: SAN DIEGO GAS & ELECTRIC CO.  
Email: CManson@SempraUtilities.com  
Status: INFORMATION

THERESA L. MUELLER CHIEF ENERGY &  
TELECOMMUNICATIONS DEPUTY  
**SAN FRANCISCO CITY ATTORNEY**  
CITY HALL, RM 234  
SAN FRANCISCO CA 94102-4682  
Email: theresa.mueller@sfgov.org  
Status: INFORMATION

SANDI MAURER  
**EMF SAFETY NETWORK**  
PO BOX 1016  
SEBASTOPOL CA 95743  
Email: sandi@emfsafetynetwork.org  
Status: INFORMATION

JEFF FRANCETIC BUSINESS DEVELOPMENT MANAGER  
**LANDIS+GYR, INC.**  
14891 LAGO DRIVE  
RANCHO MURIETA CA 95683  
Email: jeff.francetic@landisgyr.com  
Status: INFORMATION

**MRW & ASSOCIATES, LLC**  
EMAIL ONLY  
EMAIL ONLY CA 0  
FOR: MRW & Associates  
Email: mrw@mrwassoc.com  
Status: INFORMATION

BENJAMIN SCHUMAN  
**PACIFIC CREST SECURITIES**  
111 SW 5TH AVE, 42ND FLR  
PORTLAND OR 97204  
Email: bschuman@pacific-crest.com  
Status: INFORMATION

WILLIAM HARRISON  
**ROBERT W. BAIRD**  
777 E. WISCONSIN AVE  
MILWAUKEE WI 53202  
Email: wharrison@rwbaird.com  
Status: INFORMATION

RASHA PRINCE  
**SAN DIEGO GAS & ELECTRIC CO**  
555 WEST 5TH ST, GT14D6  
LOS ANGELES CA 90013  
Email: RPrince@SempraUtilities.com  
Status: INFORMATION

THERESA BURKE  
**SAN FRANCISCO PUC**  
1155 MARKET ST, 4TH FLR  
SAN FRANCISCO CA 94103  
Email: tburke@sfgwater.org  
Status: INFORMATION

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST**

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**CPUC DOCKET NO. A0712009**

Total number of addressees: 50

SANDRA ROVETTI REGULATORY AFFAIRS MANAGER  
**SAN FRANCISCO PUC**  
1155 MARKET ST, 4TH FLR  
SAN FRANCISCO CA 94103  
Email: srovetti@sflower.org  
Status: INFORMATION

ERIC P. DRESSELHUYS  
**SILVER SPRING NETWORKS**  
575 BROADWAY ST  
REDWOOD CITY CA 94063  
Email: ericd@silverspringnet.com  
Status: INFORMATION

JANET S. COMBS  
**SOUTHERN CALIFORNIA EDISON COMPANY**  
PO BOX 800  
2244 WALNUT GROVE AVE  
ROSEMEAD CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY  
Email: janet.combs@sce.com  
Status: INFORMATION

NINA SUETAKE  
**THE UTILITY REFORM NETWORK**  
115 SANSOME ST, STE 900  
SAN FRANCISCO CA 94104  
FOR: THE UTILITY REFORM NETWORK  
Email: nsuetake@turn.org  
Status: PARTY

MICHAEL ROCHMAN MANAGING DIRECTOR  
**SCHOOL PROJECT UTILITY RATE REDUCTION**  
1430 WILLOW PASS ROAD, STE 240  
CONCORD CA 94520  
Email: service@spurr.org  
Status: INFORMATION

CASE ADMINISTRATION  
**SOUTHERN CALIFORNIA EDISON COMPANY**  
LAW DEPARTMENT, ROOM 370  
2244 WALNUT GROVE AVE, RM 370  
ROSEMEAD CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY  
Email: case.admin@sce.com  
Status: INFORMATION

ROBERT FINKELSTEIN  
**THE UTILITY REFORM NETWORK**  
115 SANSOME ST, STE 900  
SAN FRANCISCO CA 94104  
Email: bfinkelstein@turn.org  
Status: INFORMATION

ADAR ZANGO ANALYST  
**ZIMMER LUCAS PARTNERS**  
535 MADISON - 6TH FLR  
NEW YORK NY 10022  
FOR: ZIMMER LUCAS PARTNERS  
Email: zango@zimmerlucas.com  
Status: INFORMATION