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Energy Division Tariff Unit
California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

Subject: PG&E's Reply Comments to EnerNOC's Response to AL 4192-E

Dear Energy Division Tariff Unit:

Pacific Gas and Electric Company (PG&E) appreciates and, except for the modification discussed below, agrees with EnerNOC, Inc.'s (EnerNOC) comments.

EnerNOC Correctly Emphasizes That PG&E's Advice Letter (AL) 4164-E Needs To Be Addressed

EnerNOC correctly raises that AL 4164-E¹ is a related "critical matter" that needs to be addressed by the California Public Utilities Commission (Commission or CPUC). It is imperative that PG&E be authorized to continue both the Demand Bidding Program (DBP) and the Capacity Bidding Program (CBP). PG&E hopes that action can be taken soon by the Commission to ensure that these programs can move forward as long as funding is authorized in a manner consistent with Decision 12-04-045.

EnerNOC Incorrectly Requests That The "Election To Withdraw From The Capacity Bidding Program Form" Should Be Modified To Include A Line For The Existing Aggregator To Acknowledge The Customer's Notice To Officially Withdraw From CBP

PG&E is concerned with EnerNOC's request for the "existing aggregator for the CBP customer to acknowledge the customer's election to withdraw." This seems to imply that PG&E is not able to act on the customer's request until the aggregator has acknowledged the customer's election. PG&E believes that a notification to the aggregator meets EnerNOC's stated reason for requesting an acknowledgement:

¹ Advice Letter 4164-E seeks a determination that both the Demand Bidding Program (DBP) and the Capacity Bidding Program (CBP) are cost effective and that PG&E should be authorized to continue both the DBP and the CBP.

Without this modification, customers can remove themselves from CBP without the aggregator ever knowing that the participant is no longer part of the aggregator's portfolio. This outcome has significant negative impacts to an aggregator's ability to fulfill its commitments.

EnerNOC Correctly States That An Aggregator Will Be Negatively Impacted If They Do Not Know About A Customer's Election To Withdraw From The CBP

PG&E agrees that the current aggregator should know of a customer's election to withdraw from CBP. However, implementing the customer's election should not be contingent on the aggregator's acknowledgment of the customer's election, which could be delayed due to factors such as disagreements between the customer and the aggregator. To avoid that type of problem while meeting the aggregator's legitimate need to know about the customer's election, PG&E proposes to add the following language to the CBP tariff:

PG&E shall notify the Customer's current Aggregator of the Customer's election. The notice shall include the effective date of withdraw.

For the reasons stated in the original Advice Letter, stated in EnerNOC's response, and by the comments stated above, PG&E believes the Commission should approve Advice Letter 4192-E and its associated tariff revisions including the additional modification to CBP proposed herein.

Sincerely,

Handwritten signature of Brian Cherry in cursive script.

Vice President, Regulatory Relations

cc: Melanie Gillette, Director, Regulatory Affairs – EnerNOC, Inc.
Sudheer Gokhale, DRA - CPUC
Cindy Li, DRA – CPUC
Sara Steck Myers, Attorney - EnerNOC, Inc.
Edward Randolph – Director, Energy Division – CPUC