

From: Dietz, Sidney
Sent: 4/2/2013 4:58:07 PM
To: Randolph, Edward F. (edward.randolph@cpuc.ca.gov)
(edward.randolph@cpuc.ca.gov)
Cc:
Bcc:
Subject: FW: PG&E's Advice 4210-E (Internal) - PG&E's Compliance Plan Required By
Decision (D.) 12-12-036 Adopting A Code Of Conduct And Enforcement
Mechanisms Related To Utility Interactions With Community Choice Aggregators

Ed –

PG&E filed our AL for the CCA code-of-conduct decision today, which is attached. We have no plans to market at this time, but we think it's possible that we would want to in the future – so the AL describes our compliance plan for the creation of an independent marketing division. Our effort here is to minimize the relationship between the utility and the independent marketing division, which is described in the letter.

Let me know if you have any questions about it, we would be happy to come in if you think it would be useful.

Have a good evening!

yours,

sid

From: [Redacted]
Sent: Tuesday, April 02, 2013 4:39 PM
To: Bottorff, Thomas E; Pruett, Greg S.; Burt, Helen; Giammona, Laurie; Hartman, Sanford (Law);

Horner, Trina; Kiyota, Travis; Lokey Etheridge, Felecia K; Malnight, Steven; Dietz, Sidney; Johnson, Aaron; Kauss, Kent; Bedwell, Ed; Cherry, Brian K; Cairns, Stephen; Janis, Megan Smith; Hernandez, Brandon J; Suri, Anil K; Mistry, Dinvar

Cc: Redacted; Littenecker, Randall (Law); Redacted
R. Brown, Jess A; Redacted; Nichols, Steven J (Director); Redacted
Redacted
Redacted; Corey, Jana; Samson, Renee; Redacted; Berman, Janice S; Redacted
Redacted; Ludemann, Doreen (Law); Kim, Ann (Law); Warner, Christopher (Law); Redacted; Phillips, Steve; Gardyne, Jennifer; Rubin, David

Subject: FW: PG&E's Advice 4210-E (Internal) - PG&E's Compliance Plan Required By Decision (D.) 12-12-036 Adopting A Code Of Conduct And Enforcement Mechanisms Related To Utility Interactions With Community Choice Aggregators

Today, we filed the attached Advice Letter advising the CPUC that, consistent with the Commission's recent Community Choice Aggregation Code of Conduct decision, we are filing a Compliance Plan associated with the creation of an Independent Marketing Division (IMD). However, we have made it clear in the filing that we are not forming an IMD at this time, have no specific plans or budget to do so.

The key messages are:

- PG&E has not yet formed an IMD, does not have a specific timeline for forming one, and has no budget or detailed plans at this time. However, PG&E expects that at some time it will wish to express to customers or governments its views on specific CCA programs that can only be expressed through an IMD under the rules in the Code of Conduct.
- Marketing and lobbying activities of the IMD will be performed entirely by outside personnel who are not employees of PG&E and who will be located at separate premises.
- PG&E expects that very little corporate support services will be provided by the utility to the IMD. This will primarily be corporate oversight, and limited compliance services.
- PG&E's Compliance and Ethics (C&E) Department will implement this Plan with respect to PG&E employees. It will be supported by other parts of PG&E, including the Law Department.
- We have done a number of training programs already, and will do additional ones before any IMD is set up. Employees of the IMD will be trained on the Code of Conduct.
- The compliance plan promises a number of additional steps that will need to be completed before any IMD is formed. This includes preparation of an intranet page, creation of some on-line training tools, and a Community Choice Aggregation IMD Transactions Procedures document.
- When asked whether this signals that PG&E intends to actively market against Community Choice Aggregation, PG&E's answer will be that when and if it forms an IMD, that will be to provide fair and accurate information to customers and communities interested in Community Choice Aggregation in accordance with the rules adopted by the CPUC.
- When asked whether PG&E plans to conduct an advertising campaign against any particular CCA proposal, PG&E would respond that it does not have any such plans at this time.
- Under any and all circumstances, PG&E will continue to cooperate and assist local governments considering CCA programs by providing necessary information and services. PG&E will also

continue to work with active CCA programs by ensuring that all of PG&E's CCA program obligations are met.

- Many of the rules in the Code of Conduct are ones PG&E has been following since 2010. Our account representatives and customer contact centers have worked long and hard to answer CCA-related questions while maintaining neutrality towards CCA programs.

Outreach efforts were underway a couple of hours prior to the filing of this advice letter which included contacts with a number of stakeholder organizations (CPUC, legislature, MEA, etc.) and selected media organizations.

Last Friday, SCE and SDG&E made their advice letter filings, both stating they did not intend on marketing or lobbying. SDG&E went further and stated that if they should decide to market or lobby against a CCA in the future, it will file a Tier 2 advice letter as provided for in Rule 22 of the Code of Conduct decision.

If you have any questions, please let us know.

Randy David Elaine

From: PG&E Tariffs

Sent: Tuesday, April 02, 2013 4:13 PM

To: Ahmed, Adam; Alexander, Brian; Alvarez, Roy; Bacon, Elizabeth; Baksheeff, Lana; Baldwin, Beulah D; Ballesteros, Roger; Bilal, Kamal; Brennan, Kenneth J (GSO); Brown, Leslie D.; Burns, Sandra; Campbell, Ben (Hydrotest); Carlson, Robert; Castillo, Joseph; Cerini, Lynn; Chang, Armando; Chang, Kimberly; Chang, Mary; Chen, Bill; Cheng, Eugene; Cheng, Michelle; Cheng, Pauline; Cherry, Brian K; Choudhary, Sonika; Cocard-Aikawa, Marianne C; Cotroneo, Eileen; Cottonham, Pally; Cowden, Robert (GSO); Crowley, Charlene M (GSO); CS CR Consultants; Csapo, Sebastien; Cuaresma, Sally; Curran, Chad; De Backer, Steven; Dimech, Charlie (GSO); Dimon, Stew; Doyle, Conor; Duran, Armando M; Eberhardt (ESP Services), Eric; Eisenman, Eric; Elliot, Laura; Emmrich, Herbert S; EP ECMS - Contract Management; Ernst, Kevin; Evans, Del; Faszholz, Marla (GSO); Faubion, Jill D.; Fisher, Barbara; Fujiwara, Kace; Fukui, Lucy; Garber, Stephen (Law); Goerndt, Joyce; Gong, Alice; Gong, Elaine T; Greenacre, Wade; Grinberg, Igor; Guiman, Cecilia; Haertle, Steve; Halverson, Shaun E; Harlan, Kenneth; Hazari, Jaydeep; Henig, Caitlin S; Hilgart, Jessica K; Hinshaw, Dave; Hirsch, Harold; How, Donald L; Hoyt, Molly; Hu, Angela Xian; Hunter, Susan; Imel, Matthew; Jang, Berta; Jang, Ronald; Kataoka, Stan; Keane, Dennis; Kjellund, Niels; La_Mere, Philip; Lam, Patrick (RATES); Lawrence, Barbara S; Lawrie, Sandy; Lawson, Megan H.; Leary, Brian; Lee, Evelyn C (Law); Lee, Helen C (A&R); Lee, Norman H; Lemler, Gregg (ET); Lewis IV, Charles (Law); Lieu, Lisa; Lim, Angelia; Liu, Jack; Lo, Lisa; Lopez, Lena; Louttit, Craig; Luo, Jay; Ly, Siov (GSO); MacDonald, Leslie; Maguire, Ted; Martin,

Michael P; Mayers, Corey; McBroom, Jaime; McCaffrey, Tom; McDonagh, Colin; McLafferty, Daniel; Mejia, Ingrid F; Merlo, Michelle (Shelly); Merriam, Hugh; Miller-Lewis, Pam J; Miram, Richard; Moorleghen, Steve; Morris, Alexander J.; Motley, Elizabeth M; Mott, Roseann; Mountford, Ann (GSO); Nava, Tino; Nave, Lee; Neilson, Joanna; Ng, Berry; Ng, Keith; Ngo, Joan; Nguyen, Christine; Ni, Tony; Novak, Todd; Olstad, Ken; Oscar, Ruth; Ostfeld, Dana; Parks, Angelina; Patil, Amrita; Pease, Daniel; Pestana, Harold; Petersen, Donald (GSO); Phan, Thien Thanh; Piccillo, Roxanne; Potesta, April C; Puckett, Lane; Rivas, Shari; Rios, Kathy; Rohde, Lauren; Rubin, David; Santos, Angelica; Savidge, Dylan; Schmidt, Clay; Schneiderman, Matthew; Sharp, Shelly; Shiu, Connie; Smith, Bruce T; Smith, Christopher; Smith, Craig L; Spence, Matt; Stacey, Meredith; Steele, Michael; Stephan, Doris; Suehiro, Bob; Tang, Michael; Tang, Teresa; Tartaglia, Stuart; Tatai, Sharon K.; Te, Ellen; Thomas, Cynthia (GSO); Tirado, Ricardo; Torres, Mark; Troup, Thomas; Truong, Bambi; Tufon, Chris; Vanko, Maria (Law); Villalobos, Kelly; von Ende, Marilou; Vosburg, Byron; Walton, Mardi; Warnock, John; Weidemann, Mareijke; Weir, James; Welch, Ray (GSO); Williams, Ian (Merchant); Winn, Valerie J; Wong, Gordon; Wong, Mei Tei; Wong, Randall K.; Wong, Shirley; Yamamoto, Robert; Yee, Calvin (Customer Impact); Yiannakopoulos, Vasi V; Yura, Ted H

Cc: Jang, Ronald; Wong, Elaine; Litteneker, Randall (Law); Dietz, Sidney; Vege, Anupama; Lawson, Megan H.

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On Tuesday, April 2, 2013, Pacific Gas and Electric Company submitted Advice Letter 4210-E to the Commission:

PG&E's Compliance Plan Required By Decision (D.) 12-12-036 Adopting A Code Of Conduct And Enforcement Mechanisms Related To Utility Interactions With Community Choice Aggregators

PGE Tariffs

Fax: (415) 973-7226