

From: [Redacted]  
Sent: 6/6/2013 4:27:46 PM  
To: Miller, Karen (karen.miller@cpuc.ca.gov)  
Cc: Dietz, Sidney (/O=PG&E/OU=Corporate/cn=Recipients/cn=SBD4); DeVine, Kyle (kyle.devine@cpuc.ca.gov); Cooper, Judy (judy.cooper@cpuc.ca.gov); Portillo, Claudia (Claudia.Portillo@cpuc.ca.gov); [Redacted]  
[Redacted]; jtuckey@marinenergy.com (jtuckey@marinenergy.com); dweisz@mcecleanenergy.com (dweisz@mcecleanenergy.com); 'jkudo@marinenergy.com' (jkudo@marinenergy.com)  
Bcc:  
Subject: Re: Community Choice Aggregation - Joint Rate Comparison Mailer - MCE and PG&E

Karen,

We appreciate the email regarding your review of the Joint Rate Comparison mailers.

PG&E's position remains the same in the following areas:

- [Redacted] PG&E feels calling something 50% renewable in one place and 33% renewable in a different place on the same mailer is very confusing.
- [Redacted] PG&E also feels the CO2 content of a provider's generation portfolio would qualify as "generation portfolio content", and is a simple yet very important bottom line number that is helpful for customers doing a comparison.

PG&E and MCE are continuing to work on the GHG language under the Generation Rate and PG&E Delivery Rate descriptions. We will provide you with a status update tomorrow.

Best regards,

Redacted

Senior Case Manger

Pacific Gas and Electric Company

Redacted

**From:** Justin Kudo [mailto:jkudo@mcecleanenergy.com]

**Sent:** Thursday, June 06, 2013 2:40 PM

**To:** Miller, Karen; Redacted

**Cc:** DeVine, Kyle; Cooper, Judy; Portillo, Claudia; Dietz, Sidney; Redacted  
dweisz@mcecleanenergy.com; jtuckey@marinenergy.com

**Subject:** RE: Community Choice Aggregation - Joint Rate Comparison Mailer - MCE and PG&E

Hi Karen,

Thank you for your continued review of this item and for presenting our unresolved issues to Carol Brown. Reading Redacted summary, we wanted to share our perspective on the unresolved issues.

**Product Description:** During our original call with the PAO, Kyle asked if customers knew what the difference was between Light Green and Deep Green, and it was suggested that MCE could include a description. MCE markets these as 50% and 100% renewable, respectively. PG&E has been resistant to inclusion of these descriptions citing that the 50% renewable descriptor would not match with the 33% renewable from the 2011 portfolio. From our standpoint it would be more confusing to customers to not include these descriptions as the chart refers to 2013 rates; MCE has marketed Light Green as 50% renewable for over a year, and would not be comfortable sending a mailer which appears to (falsely) indicate that the product is only 33% renewable.

**CO2 Emissions Language:** MCE feels that inclusion of emissions factors in the mailer is not appropriate and is inconsistent with the CPUC Decision 12-12-036 (Code of Conduct). The

Code of Conduct requires that the Joint Cost Comparison contain a comparison of costs and “generation portfolio contents”. PG&E regularly provides information on its website and other locations that describe its generation portfolio contents, but in this mailer has taken the unusual step of requesting to include its GHG emissions factor. While PG&E rates and generation portfolio contents are under the direct purview of the CPUC, GHG emissions factors are not. In fact, there is no state body that validates emissions factors. For these reasons, and most importantly, because emissions factors are not included in CPUC Decision 12-12-036, they should not be included in the mailer.

Thank you,

**Justin Kudo** | 415.464.6029

Account Manager II

[www.mceCleanEnergy.com](http://www.mceCleanEnergy.com)

**From:** Miller, Karen [mailto:[karen.miller@cpuc.ca.gov](mailto:karen.miller@cpuc.ca.gov)]

**Sent:** Thursday, June 06, 2013 11:37 AM

**To:** [Redacted]

**Cc:** Miller, Karen; DeVine, Kyle; Cooper, Judy; Portillo, Claudia; Dietz, Sidney; [Redacted]

[Redacted] [jkudo@mcecleanenergy.com](mailto:jkudo@mcecleanenergy.com); [dweisz@mcecleanenergy.com](mailto:dweisz@mcecleanenergy.com);

[jtuckey@marinenergy.com](mailto:jtuckey@marinenergy.com)

**Subject:** Re: Community Choice Aggregation - Joint Rate Comparison Mailer - MCE and PG&E

Hello all,

I am in Los Angeles today so will focus on this tomorrow. I have read through it and am glad you worked through some of the issues but am concerned that no progress has been made on the CO2 table. I will go through it all very carefully to morrow and then set up a discussion with Carol Brown.

Thanks,

Karen Miller

Sent from my iPad

On Jun 5, 2013, at 4:49 PM, [Redacted] wrote:

Dear Karen, Kyle, and Judy

We appreciate your time to review the Joint Rate Comparison mailer with PG&E and MCE last Wednesday. As we agreed, attached is a Residential and Large Commercial mailer for your review. Based on the items we discussed during the meeting, PG&E and MCE have worked together and agreed to the following:

1. Modified the language on the front of the mailer to make more clear to the customer the rate comparison is based on a rate that is representative of the customer class. If the comparison does not match with their specific rate, it directs them to MCE's and PG&E's websites.
2. Moved PG&E's column of information to show next to MCE's Light Green.
3. Removed the redundant language regarding PG&E as a collection agent in the PG&E PCIA/FF description.
4. All Customers within MCE's service area will receive from one to five of these mailers depending on the number of service accounts they have:
  - a. Residential E-1/RES-1
  - b. Small commercial A-1 non-TOU/COM-1 non-TOU
  - c. Medium Commercial A-6 / COM-6
  - d. Medium Commercial A-10 non-TOU/COM-10 non-TOU
  - e. Large Commercial E-19S/COM-19S

Originally there were going to be eight mailers but due to the low number of service accounts in three of the mailers, they will receive one of the above mailers.

The following items were considered but not changed:

1. The existing decimal places in the rates were maintained because rounding of the numbers would provide less accurate information. Also the monthly customer bill statement shows the rate in the same number of decimal places.

The following language has been added and is still being worked on by PG&E and MCE. We hope to send an update tomorrow.

1. Added language under the Generation Rate and PG&E Delivery Rate descriptions to address the deferred costs associated with greenhouse gas compliance and rate reductions associated with

the sale of greenhouse gas allowances under the California Cap-and Trade program. This will ensure the mailer is in compliance with a Proposed Decision issued by ALJ Semcer on May 28, 2013,

in the Greenhouse Gas proceeding. The Proposed Decision could be voted by the Commissioners as early as June 27 and the mailers are scheduled to be mailed starting on July 1.

The following items are unresolved between PG&E and MCE:

1. In the 2013 Rate Comparison section of the mailer, the % of renewables was not displayed under the MCE Light Green and MCE Deep Green column headings. If this was shown, the 2013 MCE Light Green renewable percentage would show 50% and be different from the MCE Light Green renewable percentage which has 33% shown under the 2011

Electric Power Generation Mix. Customers may find this confusing.

2. PG&E had agreed to provide language under the CO2 chart describing what CO2 emissions represent and is shown in the mailer. The language has been shared with MCE. The CO2 chart has been modified to show the MCE Light Green and MCE Deep Green CO2 information. MCE's position remains the same where they want the entire CO2 chart and language removed.

As mentioned above, we hope to send you the revised GHG language under the Generation Rate and PG&E Delivery Rate descriptions tomorrow.

PG&E and MCE are available to answer any questions you may have.

Best regards,

Redacted

Senior Case Manager

Pacific Gas and Electric Company

Redacted

PG&E is committed to protecting our customers' privacy.  
To learn more, please visit  
<http://www.pge.com/about/company/privacy/customer/>

<01\_E-1RES-v33.pdf>

<07\_E-19S-COM-v28.pdf>

*MCE is committed to protecting customer privacy. Learn more at: [www.mceCleanEnergy.com/privacy](http://www.mceCleanEnergy.com/privacy)*