Rulemaking: 12-06-013
(U 39 E)
Exhibit No.:
Date: November 22, 2013 Witness(es): Various

# PACIFIC GAS AND ELECTRIC COMPANY SUMMER 2014 RESIDENTIAL ELECTRIC RATE REFORM PROPOSAL PHASE 2 PREPARED TESTIMONY 

PACIFIC GAS AND ELECTRIC COMPANY SUMMER 2014 RESIDENTIAL ELECTRIC RATE REFORM PROPOSAL PHASE 2
PREPARED TESTIMONY
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# PACIFIC GAS AND ELEC TRIC COMPANY CHAPTER 1 <br> <br> SUMMER 2014 RATE REFORM POLICY 

 <br> <br> SUMMER 2014 RATE REFORM POLICY}

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# PACIFIC GAS AND ELECTRIC COMPANY CHAPTER 1 SUMMER 2014 RATE REFORM POLICY 

## A. Introduction

The purpose of my testimony is to summarize Pacific Gas and Electric Company's (PG\&E) summer 2014 residential electric rate reform proposal and demonstrate that the proposal will provide significant benefits to those customers currently burdened by excessive electric rates, better align rates with basic rate design principles, and is consistent with PG\&E's overall proposal to reform its residential electric rate structure. My testimony also demonstrates that PG\&E's summer 2014 rate reform proposal is consistent with recently enacted Assembly Bill (AB) 327 and the California Public Utilities Commission's (CPUC or Commission) rate design principles.

## B. PG\&E's Summer 2014 Rate Reform Proposal

Since the energy crisis more than a decade ago, residential electric rates in California have moved far from basic rate design principles, including the key principles that rates should be based on cost to serve and should be understandable to customers. This is simply unsustainable.

PG\&E's summer 2014 rate reform proposal will take an important step to begin to implement electric rate design reforms consistent with those summarized in PG\&E's Electric Rate Design Reform Proposal filed in this proceeding on May 29, 2013 and further discussed in PG\&E's comments on rate design proposals on July 12 and 26, 2013.

Specifically, PG\&E's summer 2014 rate reform proposal will:

- Reduce the number of price tiers from four to three in all of PG\&E's residential non-California Alternate Rates for Energy (CARE) rate schedules by combining (or "collapsing") the current Tier 2 and 3 into a single, new Tier 2 rate that applies to usage between 100 and 200 percent of baseline, 1 in order to start simplifying the rate structures.

[^0]- Adjust the current tier definitions for CARE customers so that they are consistent with those for non-CARE customers. ${ }^{2}$
- Narrow the differential between the highest and lowest tier rates for non-CARE customers to better align rates with cost of service, and provide a measure of bill relief for upper-tier consuming households throughout PG\&E's service area who have, since the energy crisis, borne the burden of paying rates well in excess of average rates.
- For CARE rate schedules, increase rates in all three tiers to begin the transition that will ultimately reduce the discount to CARE customers to between 30 and 35 percent as required by $A B 327$, with the transition continuing in future years until the CARE discount reaches the legislatively mandated level.
- Make changes to the Family Electric Rate Assistance (FERA) and Medical Baseline programs whose discounts are affected by the proposed collapsing of Tiers 2 and 3 into a single new Tier 2 rate, to adjust for those changes.
- Seek approval to update electric baseline quantities with the most recent four years of usage data. ${ }^{3}$
PG\&E's 2014 summer rate reform proposal is critically needed and should be expeditiously approved in time for summer 2014 in order to begin to mitigate the very high summer bills of hundreds of thousands of upper-tier consuming PG\&E customers. If this rate reform is not adopted and the current inequitably imbalanced rate design is retained, non-CARE residential upper tier bill increases would be exacerbated by perpetuating a rate design that is far from actual cost of service, during a time when PG\&E is committed to the implementation of California's ambitious energy and environmental policy goals

2 Currently, CARE Tier 2 rates apply to usage between 100 and 130 percent of baseline and CARE Tier 3 rates apply to usage in excess of 130 percent of baseline. Under PG\&E's summer 2014 rate proposal, CARE Tier 2 rates will apply to usage between 100 and 200 percent of baseline and CARE Tier 3 rates will apply to usage in excess of 200 percent of baseline.

In its 2012 Rate Design Window (RDW) proceeding, Application 12-02-020, PG\&E proposed to reduce baseline quantities from 55 to 50 percent of historical average usage. This proposal has been fully litigated and a proposed decision is pending. Regardless of the Commission's ultimate decision on the percentage to use (i.e., 50 percent as proposed by PG\&E, 55 percent, or some percentage in between), the Commission in this proceeding should adopt updated historical average usage figures to which the percentage adopted in the 2012 RDW proceeding should apply.
and requirements. PG\&E's Tier 3 and 4 top-tier rates are anticipated to be 32.8 and 36.8 cents per kilowatt-hour (kWh), respectively, in January 2014. PG\&E's summer 2014 rate proposal would reduce these rates to 19.9 and 35.0 cents per kWh. 4 Further, the transition to the legislatively mandated CARE subsidy levels would be significantly delayed or compressed.

PG\&E will undertake appropriate customer education and outreach to customers to help minimize confusion and inform customers of the changes in the rate structure adopted by the Commission resulting from PG\&E's summer 2014 rate reform proposal. The proposed changes to the CARE discount are modest, and PG\&E will in the future be proposing to continue to adjust these discounts over a reasonable transition period to reach the 30 to 35 percent range mandated by AB 327.

PG\&E's summer 2014 rate reform proposal is just one, important step in the multi-step process of reform that is needed to fix PG\&E's broken electric rate design structure to be consistent with AB 327 and comply with the Principles of Optimal Residential Rate Design adopted in this proceeding. PG\&E expects to present its post-summer 2014 proposals in the near future and is awaiting guidance from the CPUC regarding its desired venue and schedule. PG\&E anticipates a later filing in which it will propose additional steps to complete full reform of residential rate designs for the post-summer 2014 period (2015 and beyond), in what PG\&E anticipates would be a subsequent phase of this proceeding or other proceeding, as appropriate. 5

In order to isolate the effect of PG\&E's rate design changes, revenues were held constant at anticipated January 2014 levels in designing the proposed summer 2014 rates. PG\&E has some revenue requirement requests pending at the Commission that may increase the revenue requirement by summer 2014. However, PG\&E's proposal here is to exogenously set the new Tier 3 rate at 35 cents per kWh (and also to exogenously set the Tier 1 non-CARE rate, as well as the three CARE rates), and let the new non-CARE Tier 2 rate increase to collect any additional revenue requirement that the Commission approves. decision on such proposals by April 2014 for rates effective May 1, 2014. In their November 8, 2013 comments on the ACR, PG\&E and the other investor-owned utilities (IOU) have requested Commission direction on where proposals for rate reform beyond summer 2014 should be made, such as in a subsequent phase of this proceeding or in separate utility-specific applications. CPUC guidance is still being awaited as to its desired timing and venue for post-summer 2014 rate reform proposals under $A B 327$.

Over a reasonable transition period, the cumulative effect of PG\&E's expected overall rate design reform proposals will be to provide many upper-tier consuming residential electric customers in California with relief from volatile electric bills and also provide better price signals for all customers. Such proposals will make PG\&E's residential rates simpler and more equitable, by flattening the current steep tier differentials that cause too many customers to pay rates far above their actual cost of service.

## C. PG\&E's Current Residential Rates Are Highly Inequitable

As discussed above, without PG\&E's summer 2014 rate reform proposal, the current broken residential electric rate structure will continue to punish upper-tier consuming households by charging rates well in excess of actual costs. Currently, PG\&E's average residential rate is 17.0 cents per kWh, yet electricity consumed by non-CARE customers in Tier 4 is charged a rate more than double that level, at 35.9 cents per kWh. At the same time, non-CARE customers consuming in Tiers 1 and 2 pay just 13.2 and 15.0 cents per kWh, respectively. ${ }^{6}$ These order of magnitude differences between the highest and lowest tiers are highly inequitable, and do not in any way comport with the longstanding principle that rate design should reflect cost of service. 7 Maintaining the current broken rate structure would continue to send inaccurate price signals to customers, particularly those customers consuming in the lower tiers and CARE customers whose rates are lower today than they were 20 years ago, despite inflation and increases in the cost of providing electric service.

Figure 1-1 graphically illustrates the broken state of present rates. Prior to the energy crisis, PG\&E's non-CARE and CARE rates each had just two tiers, with the upper-tier rate having only a modest price differential compared to the lower-tier rates. In January 2001, the ratio of the highest to the lowest

6 CARE customers consuming in Tier 1 and 2 pay way less than that, 8.3 and 9.6 cents per kWh, respectively.
7 The lack of cost basis is easily seen by examining how residential rates are designed. Tier 1 and 2 rates for both non-CARE and CARE customers are set exogenously by the Senate Bill 695 formulas. The CARE Tier 3 rate was similarly set exogenously by the Commission in Decision 11-05-047. The non-CARE Tier 3 and 4 rates are then solved for at whatever levels are required to collect the residual revenue not collected by the exogenously set rates, subject to the proviso that they be 4 cents apart. So these rates are clearly not based upon PG\&E's marginal costs, or any other measure of cost of service.

FIGURE 1-1
PACIFIC GAS AND ELECTRIC COMPANY HISTORICAL PG\&E CARE AND NON-CARE RATES 2001-2013

non-CARE rate was just 1.15 to 1 and the CARE discounts were set at a modest 15.3 percent. Today, after years of legislative restrictions on raising CARE rates and lower-tier non-CARE rates, the ratio of the highest to the lowest non-CARE rate has grown to a whopping 2.71 to 1 , and the average CARE discount is now

Figure 1-1 also shows that there is an 18.9 cent per kWh gap between the top tier rate ( 35.9 cents per kWh ) and the average rate paid by all of PG\&E's residential customers, represented by the dotted purple line ( 17.0 cents $/ \mathrm{kWh}$ ).

[^1]As noted earlier, Tier 4 sales are currently being charged more than twice the average residential rate. ${ }^{9}$ The customers harmed by today's unfair rate structure are not limited to a particular geographic area, such as the Central Valley, but are spread across most of PG\&E's service territory. 10 The majority of these customers are not rich, and they are not eligible for low-income discounts. 11 More than half a million of Tier 3 or above usage customers are middle class families with household incomes of less than $\$ 75,000$ per year. 12 Nor are their overpayments trivial. In fact, one-fifth of PG\&E's residential electric customers—over 1 million—now pay an average of over $\$ 500$ per year in excess of the average residential rate. 13

Today's skewed, severely inclining tiered electric rates, and their inequitable impact on customers throughout PG\&E's service territory are also very challenging for customers to understand. High upper-tier rates create bill volatility. A typical customer with only modest amounts of usage can experience much higher bills during the hottest summer months, merely by driving their usage from Tier 2 up into the sharply higher-priced Tiers 3 and 4 . This bill volatility tends to lead to customer frustration, confusion and dissatisfaction because bill increases are disproportionate compared to the customers' actual changes in usage.

Over the next several years, in keeping with California's energy and environmental policy goals and requirements, PG\&E needs to make significant

9 While not quite as severe of a premium, Tier 3 sales, too, are charged a rate far in excess of the average rate (a differential of 14.9 cents per kWh, or 1.88 times as much).
10 PG\&E Rate Data Analysis, 2012 Annual Statistics for Residential Customers by City, April, 2013.
11 Based on a sample of PG\&E's residential customers responding to 2009 Residential Appliance Saturation Survey, PG\&E matched reported income levels to 2012 usage data from $P G \& E$ billing files.
12 Id. Of the 865,000 non-CARE, lower-income households with annual incomes between $\$ 30,000$ and $\$ 60,000$, over one-third have high usage and pay an average annual rate that exceeds the residential class average. Similarly, of the 1 million non-CARE moderate income households in the $\$ 60,000$ to $\$ 100,000$ annual income range, over half have high usage and pay an average annual rate that exceeds the residential class average. In contrast, over 40 percent of the nearly 1.1 million higher income households with incomes exceeding $\$ 100,000$ per year have low usage and pay an annual average rate below the residential class average.
13 PG\&E Rate Data Analysis, 2012 Annual Statistics for Residential Customers by City, April, 2013.
investments in infrastructure to improve system reliability and safety, as well as to increase its clean energy resources. PG\&E's customers support these utility system investments needed to maintain and improve service. But if the costs are not shared more evenly among all customers, PG\&E and the other California IOUs and policymakers risk a significant consumer backlash against these policies because of the disproportionate rate impact.
D. PG\&E's Summer 2014 Rate Reform Proposal Complies With the Commission's Rate Design Principles and Supports the Policies in AB 327

Rate design must balance a number of different objectives that can sometimes come into conflict with one another. PG\&E's summer 2014 rate reform proposal and other rate reform proposals are guided by the following rate design principles endorsed by the Commission and provided in $A B 327$.

## 1. Cost of Service

Pub. Util. Code Section 451 requires that the Commission establish rates that are "just and reasonable." Traditionally, "just and reasonable" rates are based on the cost of service. ${ }^{14}$ The costs of providing utility services vary with customer usage characteristics and with the facilities needed to serve a customer. Keeping rates as close as possible to cost of service is equitable, in contrast to the current state of residential rates in which post-energy crisis restrictions on changes to rates for Tiers 1 and 2 have caused upper-tier non-CARE rates to bear a disproportionate and highly inequitable share of residential cost of service.

PG\&E's summer rate reform proposal to collapse Tiers 2 and 3 will transition below-cost current Tier 1 and 2 rates, and above-cost current Tier 3 and 4 rates, closer to cost of service. Similarly, PG\&E's proposal to begin transitioning CARE rates to the statutory range of between 30 and 35 percent will move these rates closer to cost of service, while still maintaining a substantial discount for these lower income customers.

[^2]
## 2. Rate Stability

As both AB 327 and the Commission's rate design principles note, while it is important to move toward more appropriate, economically efficient and cost-based price signals, this goal should be balanced with a concern for mitigating sudden and unduly large bill increases. This means that the full extent of "cost-based rates" cannot be implemented in one step. PG\&E's summer rate reform proposal is part of a multi-step reasonable transition period, under which reforms to the residential rate structure are implemented over time, balancing the need to move as quickly as possible to fix the current inequitable rate imbalances with a desire to mitigate the bill impacts that would occur if all the necessary reforms were implemented all at once.

## 3. Understandable, Meaningful and Practical to Implement

Along with economically efficient, cost-based pricing, rates should be simple and understandable, to better empower customers to take actions to control their energy expenses and usage. Accordingly, rates should be as simple as possible while retaining appropriate price signals and offering meaningful choices to customers. PG\&E's proposal to reduce the current multiple tiers from four to three supports movement toward more understandable rates for customers. Furthermore, rates should be practical to implement. PG\&E's summer 2014 rate reform proposals have been designed to allow practical implementation in a short time (e.g., they involve minimal structural changes to PG\&E's billing system), as is necessary given the urgent need for action by summer 2014. Accordingly, PG\&E's summer 2014 rate reform proposals support the proposed schedule for this proceeding which provides for a proposed decision in March 2014 for rates effective May 1, 2014.

## E. PG\&E's Summer 2014 Rate Reform Proposal Protects CARE Customers

AB 327 requires that discounted rates to low-income CARE customers be transitioned to the range of 30 to 35 percent. Based on its 2014 Annual Electric True-Up (AET) filing, PG\&E's average CARE discount is anticipated to be 49 percent ${ }^{15}$ on January 1, 2014, and could increase up to 53 percent by

[^3]summer 2014.16 PG\&E's overall rate reform proposal must transition CARE discounts downward significantly to reach the 30 to 35 percent range mandated by the new statutory language. To do this, and at the same time ensure that CARE customers are protected against excessive bill impacts, PG\&E's summer 2014 rate reform proposal begins to gradually increase CARE rates over a multi-year period starting in 2014.

PG\&E's proposal takes into consideration that CARE customers will see some bill increases as a result of this proposal, and balances the objective of making progress to the legislatively mandated minimum CARE discount levels with CARE customers' ability to manage their energy bills and usage.

In addition, PG\&E is implementing certain CARE program and eligibility reforms that were agreed to by the utilities and consumer groups and enacted by AB 327, including basing CARE eligibility on two-person household income levels and providing guidance on categorical income eligibility verification requirements. Furthermore, $\mathrm{PG} \mathrm{\& E}$ is working to improve the targeting and delivery of CARE assistance to eligible customers, and will work with consumer advocacy groups to develop and propose program changes in the Commission's triennial low income programs proceeding based on the findings presented in the Needs Assessment study for the Energy Savings Assistance and CARE programs. With this balanced approach, both PG\&E's overall and its summer 2014 rate reform proposals will ensure that energy assistance levels for CARE customers among California's electric utilities are more consistent and closer to the historical discount levels endorsed by consumer advocates and the utilities during non-energy crisis periods.

## F. PG\&E's Summer 2014 Rate Reform Proposal Should Be Approved

## Promptly

As demonstrated in PG\&E's testimony and its comments and filings in the Commission's Rate Design rulemaking, California's current IOU residential electric rate design structure is neither cost-based nor equitable, and therefore

[^4]fails to meet the Commission's rate design principles. Over a million of PG\&E's residential electric customers across all income levels and all parts of PG\&E's service territory are paying millions of dollars a year in higher electric bills because of the broken rate design structure.

The broken rate structure cannot be fixed in a single step. But it must be fixed soon and through a consistent series of meaningful steps, starting with immediate approval of PG\&E's summer 2014 rate reform proposal. Without significant and prompt residential electric rate reform as PG\&E has proposed, the current unfair shifting of costs among customers will get worse and potentially derail California's ambitious energy and environmental agenda. The Legislature has enacted, and the Governor has approved, AB 327, giving the Commission the tools to fix and reform today's broken rate structure. The Commission should expeditiously approve the rate reforms needed to fully implement AB 327, starting with PG\&E's summer 2014 rate reform proposal. PG\&E's summer 2014 rate reform proposal is a reasonable, modest first step in the transition to a more fair and equitable residential rate design that better aligns with cost of service and principles of equity.

As discussed in PG\&E's testimony and in its earlier rate proposal and comments in this rulemaking, PG\&E's summer 2014 rate reform proposal is fully supported by the facts and demographics of PG\&E's customers and costs of service, and is consistent with the Commission's principles for optimal rate design and the requirements of AB 327. The Commission should adopt PG\&E's summer 2014 rate reform proposal as soon as possible so that PG\&E can begin to provide impacted customers with the significant rate relief they need starting in summer 2014.

# PACIFIC GAS AND ELEC TRIC COMPANY CHAPTER 2 <br> SUMMER 2014 RESIDENT IAL RATE DESIGN 

# PACIFIC GAS AND ELECTRIC COMPANY CHAPTER 2 <br> SUMMER 2014 RESIDENTIAL RATE DESIGN 

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## PACIFIC GAS AND ELECTRIC COMPANY

 CHAPTER 2SUMMER 2014 RESIDENTIAL RATE DESIGN

## A. Introduction

Over the last 13 years since the California energy crisis, largely due to statutory restrictions limiting the California Public Utilities Commission's (CPUC or Commission) rate-setting flexibility, the rates for Pacific Gas and Electric Company's (PG\&E) upper-tier consuming households who are not in the California Alternate Rates for Energy (CARE) program (non-CARE customers) have grown to extremely high levels well above cost of service. At the same time, the rates for lower-tier consuming non-CARE households have remained well below average cost. ${ }^{1}$ In addition, post-energy crisis, the average discount received by PG\&E's CARE households has grown from a modest 15 percent in early 2001, to an effective discount of 48 percent today. 2 Thus PG\&E's current residential rates are substantially misaligned from the cost of providing service. As described in Chapter 1, Assembly Bill (AB) 327 removes many of the restrictions on the Commission that led to today's broken residential rates. With its newfound ratemaking authority, the Commission is now able, over a reasonable period of time, to restore residential rates-both their structures and the levels of specific rate components-to more equitable levels that more closely reflect cost of service.

This chapter presents PG\&E's proposals for changes in its residential rate design to take effect on May 1, 2014 (referred to as the summer 2014 rate reform proposals). These summer 2014 rate reform proposals are a modest but important first step toward providing rate relief for PG\&E's upper-tier consuming non-CARE customers while also beginning the process of ultimately reducing

1 Throughout this testimony, PG\&E uses "upper tiers" to refer to its current Tier 3 and 4 (i.e., consumption in excess of 130 percent of baseline), and uses "lower tiers" to refer to Tier 1 and 2 usage (i.e., usage up to 130 percent of baseline).
2 The CARE discount is calculated by taking the difference between (a) CARE sales by tier priced at non-CARE rates and (b) CARE sales by tier priced at CARE rates, then dividing this difference by (b) to yield a CARE percent discount from non-CARE rates. Beginning in 2014, this formula will be modified to account for Climate Dividend revenue returns in both the numerator and denominator. The Climate Dividend was authorized in the Greenhouse Gas OIR by the CPUC in D.12-12-033.

CARE discounts to the 30 to 35 percent range mandated by AB 327. PG\&E anticipates a later filing in which it will propose additional steps that, over time, will result in a full and complete reform of residential rate designs for the post-summer 2014 period (2015 and beyond). In this filing, PG\&E limits its proposal to rates that would become effective May 1, 2014, to put residential rates on the path to rate reform as described in PG\&E's May 29, 2013 Electric Rate Design Reform Proposal. ${ }^{3}$ Specifically, PG\&E proposes the following changes to residential rates for summer 2014:

- For all rate schedules that currently have four tiers, 4 reduce the number of tiers from four to three by combining Tiers 2 and 3 together into a single, new Tier 2 rate that applies to usage between 100 and 200 percent of baseline. 5
- For all non-CARE rate schedules, begin to make progress toward narrowing the extremely large differential between the bottom and top tier rates.
- For CARE rate schedules, increase rates in all three tiers to begin to reduce the overall CARE discount percentage, as mandated by AB 327.
- Propose changes to rates for Family Electric Rate Assistance (FERA) and Medical Baseline customers whose discounts or participation credits, respectively, are impacted by the proposed collapsing of Tiers 2 and 3 , to adjust for those changes.

[^5]- Update baseline quantities to reflect a more recent period of historical usage, as required under the CPUC's Rate Case Plan. ${ }^{6}$
In developing its summer 2014 rate reform proposals, PG\&E has designed rates to collect the same annual revenues as are anticipated to be collected from residential customers as of January 1, 2014. Those anticipated revenues are taken from Advice Letter 4278-E, PG\&E's 2014 Annual Electric True-Up (AET) filing, for rates effective January 1, 2014.7 As a first step, PG\&E developed January 1, 2014 rates for each of its residential schedules. These rates are slightly different from those shown in the AET filing because subsequent to that filing, on November 13, 2013, PG\&E filed Advice Letter 4314-E proposing three percent increases to Tiers 1 and 2 rates for both non-CARE and CARE customers. The AET rates, in contrast, did not include the three percent Tier 1 and 2 increases for CARE rates. ${ }^{8}$ The second step in the process was to develop revenues at January 1, 2014, rates by applying January 1, 2014, developed rates to 2014 forecasted sales by tier. 9 This step yields the revenue requirement to be collected by proposed summer 2014 rates. As it does in GRC Phase II proceedings, PG\&E has designed rates here at levels sufficient to collect these same 2014 revenues as would be collected at January 1, 2014 rates. This approach isolates the effect of the rate design proposals

6 The Commission's Rate Case Plan requires that the usage data by climate zone that determine baseline quantities be updated in General Rate Case (GRC) Phase II proceedings. However, to avoid overlap, the Administrative Law Judge (ALJ) in PG\&E's 2014 GRC Phase II proceeding (A.13-04-012), ALJ Long, suspended the schedule for consideration of most residential rate issues (all but the electric mastermetered discounts and the natural gas baseline quantities) until the CPUC could provide guidance (presumably in this Order Instituting Rulemaking (OIR) proceeding) as to the venue and timing for further rate reform proposals relating to the post-summer 2014 period. Thus PG\&E is presenting its proposal for updated electric baseline quantities in this proceeding. PG\&E's baseline quantity update proposal here is identical to its proposal currently suspended in PG\&E's 2014 GRC Phase II proceeding.
7 Advice Letter 4278-E was filed on August 30, 2013.
8 At the time PG\&E's 2014 AET was initially filed, the legislature had not yet approved a cost of living adjustment for the CalWORKs program (the approval of which permits a 3 percent increase to CARE Tiers 1 and 2 rates per Public Utilities Code (P.U.C.) Section 739.1(b)(2)).
9 The 2014 sales are from PG\&E's November 5, 2013 update in its 2014 Energy Resource Recovery Account (ERRA) Forecast proceeding.
independent of any other revenue requirement changes between January 1 and May 1 of 2014.

PG\&E already has a proposal to decrease baseline quantities from 55 to 50 percent of historical average usage (the statutory minimum) that has been fully litigated and is pending a decision in its 2012 Rate Design Window (RDW) proceeding. 10 If adopted, this proposal would, by itself, help reduce PG\&E's very high upper-tier non-CARE rates, decreasing them by about 3 cents per kilowatt-hour (kWh). At the time this summer 2014 rate reform proposal is being filed, the Administrative Law Judge (ALJ) in the 2012 RDW proceeding has not yet issued a proposed decision on PG\&E's 50 percent baseline proposal. 11 For purposes of its proposal in this proceeding, PG\&E has assumed that the Commission will have adopted PG\&E's proposal for reduced baseline quantities before summer 2014 in the 2012 RDW proceeding, and PG\&E has designed its proposed summer rates (and shown the resulting bill impacts) here, accordingly. ${ }^{12}$

As described earlier, PG\&E's summer 2014 rate reform proposals are designed in part to balance the objectives of increasing CARE rates in order to reduce the CARE discount percentage toward the legislatively mandated range, while managing customer bill impacts for CARE households. PG\&E believes its summer 2014 rate reform proposal strikes a reasonable balance, assuming baseline quantities are set at 50 percent of historical average usage. If, however, the Commission were to adopt something different from PG\&E's proposal for 50 percent baseline quantities by May 1,2014 , and either were to leave PG\&E's baseline quantities at their current 55 percent level or were to adopt a level in between 50 and 55 percent, proposed CARE rates could be set at higher levels and still result in similar levels of bill impacts as PG\&E is

## 10 Application 12-02-020.

11 The statutory 18-month period for deciding this case was August 2013.
12 A complicating factor is that, since 2012 RDW was filed almost two years ago, in February 2012 PG\&E filed its 2014 GRC Phase II application, updating its 50 percent baseline quantities to reflect more recent historical usage data. Whereas the baseline quantities proposed in the 2012 RDW for basic vs. all-electric service in PG\&E's ten climate zones were based on historical usage during the period from November 2005 to October 2009, the 2014 GRC Phase II proposal used baseline quantities reflecting more recent usage-from May 2008 to April 2012. Those proposed baseline quantities are now part of this proceeding. See Section $E$.
proposing here. In the event of that contingency, PG\&E proposes to adjust its proposed CARE rates upward using an equal-cents-per-kWh adder that would be applied to all three tiers of CARE rates so as to result in the same average CARE rate as would occur if PG\&E's 50 percent baseline proposal is approved. Illustrative "contingency" rates are shown below in Table 2-1, PG\&E's adjusted proposed rates if the Commission were to reject PG\&E's 50 percent baseline proposal.

PG\&E's summer 2014 rate reform proposal complies with the guidelines set forth in President Peevey's Assigned Commissioner's Ruling (ACR) that relate to non-CARE rates, ${ }^{13}$ namely:

1) To prevent further disparity in lower and upper tiers, any rate increase from increased revenue requirements should be applied first to the lower tiers.
2) To avoid "rate shock," Tier 1 and Tier 2 rates should not be increased by an excessive amount.
3) To prevent future "rate shock," Tier 1 and Tier 2 rate changes should begin to increase in 2014.
Table 2-1 compares the current tiered structure for non-CARE and CARE rates (with four tiers for non-CARE and three for CARE) with PG\&E's summer 2014 proposed structure (with three identically defined tiers for both non-CARE and CARE). For non-CARE customers, usage between zero and 100 percent of baseline will continue to pay Tier 1 rates. Usage between 100 and 200 percent of baseline, which currently pays two different rates, will pay the new Tier 2 rate. Finally, usage above 200 percent of baseline will still have its own tier—but it will just be renamed from "Tier 4" to "Tier 3." For CARE, usage between zero and 100 percent of baseline will continue to pay the Tier 1 rate, and usage between 100 and 130 percent of baseline will continue to pay the Tier 2 rate. However, usage between 130 and 200 percent of baseline, which today pays the Tier 3 rate, will now pay the Tier 2 rate. Finally, usage above 200 percent of baseline will continue to pay the Tier 3 rate.
[^6]TABLE 2-1
PACIFIC GAS AND ELECTRIC COMPANY CURRENT AND PROPOSED RATE STRUCTURES FOR TIERED RATE SCHEDULES

| Usage Levels | Current Tier | New Tier |
| :--- | :---: | :---: |
| Non-CARE - Tiered schedules |  |  |
| Zero to $100 \%$ of Baseline | 1 | 1 |
| $100 \%$ to $130 \%$ of Baseline | 2 | 2 |
| $130 \%$ to $200 \%$ of Baseline | 3 | 2 |
| Over $200 \%$ of Baseline | 4 | 3 |
| CARE Tiered schedules |  |  |
| Zero to $100 \%$ of Baseline | 1 | 1 |
| $100 \%$ to $130 \%$ of Baseline | 2 | 2 |
| $130 \%$ to $200 \%$ of Baseline | 3 | 2 |
| Over $200 \%$ of Baseline | 3 | 3 |

Table 2-2 shows present, anticipated January 1, 2014, and proposed summer 2014 rates for non-CARE and CARE customers taking service on PG\&E's standard tiered rate schedules, Schedules E-1 and EL-1. Column C shows PG\&E's present (October 1, 2013) rates and Column D shows PG\&E's anticipated January 2014 rates. These rates apply to the current four-tiered structure. 14 The January 1, 2014 rates for non-CARE and CARE Tier 1 and 2 usage are all three percent higher than their current levels, consistent with Advice Letter 4314-E.

Column F in Table 2-2 shows PG\&E's proposed summer 2014 rates under its new three-tier structure. As described in greater detail in Sections B and C, the proposed summer 2014 rates feature an increase to the non-CARE rate applicable to usage below 100 percent of baseline and a decrease to the non-CARE rate applicable to usage above 200 percent of baseline, to begin the

14 PG\&E uses the term "four-tiered structure" as shorthand since there are four tiers for non-CARE customers (even though CARE customers currently only have three tiers of rates). To facilitate comparisons between the present and proposed rate structures, Table 2-2 shows four usage tiers even though there may not be that many for a particular rate or rate proposal. For example, the "Present Rates" column shows four tiers for CARE, even though there are currently just three tiers. But the rates for usage between 130 and 200 percent of baseline are identical to the rates for usage above 200 percent of baseline, showing that there really are just three distinct tiered rates. process of narrowing the very large gap between the highest and lowest tier rates. It also features increases to the CARE rates applicable to usage below 100 percent of baseline and to usage above 200 percent of baseline. Because of the tier redefinitions, the rates for non-CARE and CARE usage between 100 and 200 percent of baseline are mixed: usage between 100 and 130 percent of baseline sees rate increases, but usage between 130 and 200 percent of baseline sees decreases.

TABLE 2-2
PACIFIC GAS AND ELECTRIC COMPANY
SCHEDULE E-1 (NON-CARE) RATES
PRESENT, ANTICIPATED JANUARY 2014, AND PROPOSED SUMMER, 2014

| A | B | C | D | E | F | G |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Current Four-Tiered Structure |  |  | Proposed New Three-Tiered Structure |  |  |
| Usage Level | Current Tier | Present Rates October 2013 | Anticipated Rates January 2014 | New Tier | Proposed Rates Summer 2014 | Contingency Rates Summer 2014 |
| Non-CARE (Schedule E-1) |  |  |  |  |  |  |
| Zero to $100 \%$ of Baseline | 1 | \$0.13230 | \$0.13627 | 1 | \$0.15000 | \$0.15000 |
| $100 \%$ to $130 \%$ of Baseline | 2 | \$0.15040 | \$0.15491 | 2 | \$0.19897 | \$0.22674 |
| 130\% to 200\% of Baseline | 3 | \$0.31916 | \$0.32839 | 2 | \$0.19897 | \$0.22674 |
| Over 200\% of Baseline | 4 | \$0.35916 | \$0.36839 | 3 | \$0.35000 | \$0.35000 |
| CARE (Schedule EL-1) |  |  |  |  |  |  |
| Zero to $100 \%$ of Baseline | 1 | \$0.08316 | \$0.08565 | 1 | \$0.09500 | \$0.09719 |
| 100\% to $130 \%$ of Baseline | 2 | \$0.09563 | \$0.09850 | 2 | \$0.12500 | \$0.12719 |
| 130\% to 200\% of Baseline | 3 | \$0.13974 | \$0.13974 | 2 | \$0.12500 | \$0.12719 |
| Over 200\% of Baseline | 3 | \$0.13974 | \$0.13974 | 3 | \$0.17000 | \$0.17219 |

President Peevey's ACR directs the utilities to show the cumulative effects of all pending requests for rate changes that would go into effect between now and summer 2014. For PG\&E, there are two pending requests. The first is the 2012 RDW proposal to reduce baseline quantities to 50 percent of historical average usage, mentioned above. Because the Commission may adopt PG\&E's request, leave baseline quantities at 55 percent, or adopt some percentage in between 50 and 55 percent, it is difficult to know the precise effects on PG\&E's proposed rates. Column G in Table 2-2 shows PG\&E's aforementioned "contingency" rate proposal for rates in the event the Commission does not approve PG\&E's 2012 RDW proposal to reduce baseline quantities to 50 percent of historical average usage. Columns $F$ and $G$ therefore
provide "book-end" proposed rate levels to account for the uncertainty regarding the levels at which future baseline quantities are set.

The second pending request is Advice Letter 4314-E, filed November 13, 2013, to apply the Senate Bill (SB) 695 index formulas to increase non-CARE and CARE Tier 1 and Tier 2 rates by three percent each. Those proposed rates are shown in Column D in Table 2-2. However, PG\&E's summer 2014 rate proposal does not depend on the Commission approving the increases to lower-tier rates in Advice Letter 4314-E. Its proposed summer 2014 rate levels would be the same whether or not the advice letter is approved. However, PG\&E believes that it would be preferable for lower-tier users to have their rates increased in two more gradual steps-first a 3-percent increase on January 1, 2014 per Advice Letter 4314-E, followed by the summer 2014 increases proposed here—rather than to experience a single, larger increase all at once on May 1, 2014. Consequently, PG\&E is hopeful that the Commission will approve Advice Letter 4314-E for rates effective on January 1, 2014, to start making incremental progress. Per the ACR which requires the utilities to show cumulative effects in their filings, $P G \& E$ has run bill impacts showing cumulative bill changes from current rates (effective as of October 1, 2013) to proposed summer 2014 rates, as well as showing changes from January 1, 2014 rates to summer 2014 rates, which is what customers will actually experience once this decision is issued, because the January 1, 2014 rates will already be in effect by then. The bill impact analyses focusing on the effects of PG\&E's rate reform proposal-those showing bill changes from January 1, 2014 to summer 2014— are summarized in various sections below. However, the detailed bill impacts for both comparisons are contained in the appendices to this chapter. 15

The remainder of this chapter is organized as follows. Section B presents PG\&E's proposals for standard tiered rates for non-CARE customers, Section C presents the analogous proposals for standard tiered rates for CARE customers, and Section D presents PG\&E's proposals for optional TOU (Schedules E-6 and E-7) and seasonal rates (Schedule E-8). PG\&E's proposal for setting electric baseline quantities is in Section E. Finally, Section F presents PG\&E's proposal

[^7]for changing residential rates between cases in which the Commission authorizes changes to residential rate design structures.

## B. Standard Non-CARE Rates

## 1. Proposed Summer 2014 Non-CARE Rates

A significant driver behind the Legislature's adoption of $A B 327$ was the recognition that the post-energy crisis four- and five-tier structures and related $A B 1 x$ constraints forced almost all rate increases onto a very small portion (one-quarter or less) of residential sales (i.e., non-CARE sales occurring in Tier 3 and above), causing a large and inequitable disparity between the upper- and lower-tier rates. Non-CARE upper-tier rates skyrocketed and, despite the CPUC's efforts prior to AB 327, the prices paid by over a million PG\&E customers remain at levels that are far above PG\&E's marginal costs or any other measure of cost of service. On the other hand, non-CARE customers whose usage remains in the lower tiers currently pay (and have paid for over a decade) prices well below the cost to serve them.

This unfair imbalance is clearly shown in Table 2-3 below, which presents the current non-CARE residential rates by tier for PG\&E and each of the other two California IOUs. As the table shows, PG\&E's current non-CARE rates for both Tiers 3 and 4 are in excess of 30 cents per kWh, with the 35.9 cent Tier 4 rate being more than twice as high as PG\&E's average residential rate of 17.0 cents per kWh , and the differential between PG\&E's highest and lowest tier rates is huge- 22.7 cents per kWh. The table also shows that PG\&E's top-tier non-CARE rate is higher than that of San Diego Gas \& Electric Company (SDG\&E) and substantially higher than that of Southern California Edison Company (SCE). PG\&E's upper-tier
rates are among the highest tiered rates in the state, 16 and PG\&E is concerned about their impacts on customer bills, and serious bill volatility problems, when hot weather returns in the summer of 2014.

TABLE 2-3
PACIFIC GAS AND ELECTRIC COMPANY COMPARISON OF PRESENT NON-CARE RATES OF CALIFORNIA INVESTOR-OWNED UTILITIES

| Tier | Rates (\$/kWh) |  |  |
| :---: | :---: | :---: | :---: |
|  | SCE | SDG\&E | PG\&E |
| 1 | $\$ 0.128$ | $\$ 0.148$ | $\$ 0.132$ |
| 2 | $\$ 0.160$ | $\$ 0.171$ | $\$ 0.150$ |
| 3 | $\$ 0.268$ | $\$ 0.337$ | $\$ 0.319$ |
| 4 | $\$ 0.308$ | $\$ 0.357$ | $\$ 0.359$ |

Notes:

1. PG\&E rates are from Schedule E-1, effective October 1, 2013.
2. SCE rates are from Schedule D, effective October 1, 2013.
3. SDG\&E rates are from Schedule DR, effective September 1, 2013.

Consequently, PG\&E is proposing rate increases for lower-tier non-CARE customers that will make immediate meaningful progress to address the high upper-tier rate problem and the subsidy that upper-tier consuming non-CARE households have been forced to provide to others due to prior legislative restrictions. This inequity should be remedied as soon as possible, now that the Commission has the authority to do so.

16 PG\&E has researched the residential energy rates of 35 other investor-owned and publicly-owned utilities. Only one, Hercules Municipal Utility (which is in the process of selling its distribution system to PG\&E), charges a higher energy rate than PG\&E's current Tier 4 rate of 35.9 cents per kWh (SDG\&E has a higher summer rate but a lower winter rate; the average of the two is slightly lower than PG\&E's 35.9 cent per kWh rate). Similarly, PG\&E's steep tier differential and high upper-tier rates also appear to be an outlier nationally, based on testimony received into evidence in PG\&E's 2012 RDW. During hearings in that proceeding, TURN's witness, Mr. William Marcus, who works on rate design issues for clients in other parts of the country than California, testified that he did not know of any electric utility in the country with a non-TOU rate anywhere near the level of PG\&E's upper tier rate, or its upper and lower tier differential. And Mr. Marcus stated that he knew of only one other utility in the nation other than those in California (Austin Electric in Texas) that had more than three tiers for its residential rate. (See citations in PG\&E's Opening Brief dated November 2, 2012, in A. 12-02-020 at p. 10.)

Consequently, the first step to doing so should be a significant one. Specifically, PG\&E is proposing the following: 17

- Set the non-CARE Tier 1 rate at 15.0 cents per kWh, about 1.4 cents higher than its anticipated level in January 2014 and about 1.8 cents higher than its level today.
- Collapse Tiers 2 and 3 together into a new Tier 2 rate for usage between 100 and 200 percent of baseline. This will result in a new non-CARE Tier 2 rate that is part-way between the current Tier 2 and 3 rates, at a level of 19.9 cents per kWh. 18
- Set the new non-CARE Tier 3 rate (which is the old Tier 4 rate) for usage in excess of 200 percent of baseline at 35.0 cents per kWh , about a penny per kWh lower than today's Tier 4 rate.
The resulting rates are shown in Table 2-2. These new rates will be simpler with one fewer tier, significantly reduce the rates paid by upper-tier non-CARE households to more reasonable and less punitive levels, and will begin to reduce the CARE discount percentage. 19


## a. Summer 2014 Medical Baseline Proposal

PG\&E's proposal to collapse Tiers 2 and 3 into a single Tier 2 (for usage between 100 and 200 percent of baseline) for summer 2014 has

[^8]implications for Medical Baseline customers. Currently, Medical Baseline customers receive both augmented baseline quantities and a discount on usage in excess of 200 percent of baseline. Specifically, they only pay the current Tier 3 rate for their current Tier 4 usage, which represents a four cent per kWh discount. PG\&E proposes to continue this 4 -cent-per-kWh discount for Medical Baseline customers on usage in excess of 200 percent of baseline under its proposed three-tier structure. So, under PG\&E's proposal, Medical Baseline customers would continue to pay the standard rates for usage up to 200 percent of baseline and receive a four cent per kWh discount on the standard rate applicable to usage in excess of 200 percent of baseline-just as they do today.

## b. Summer 2014 Family Electric Rate Assistance Proposal

PG\&E's tier collapse proposal also has implications for customers on the Family Electric Rate Assistance (FERA) program. On Schedule E-FERA, qualifying customers currently pay the standard rate for usage up to 130 percent of baseline, and also pay the standard rate for usage in excess of 200 percent of baseline. However, FERA customers only have to pay the Tier 2 rate (instead of the Tier 3 rate) for usage between 130 and 200 percent of baseline. At current Schedule E-1 rate levels, this represents a discount of about 17 cents per kWh for current Tier 3 usage (a 53 percent discount). This is a rather convoluted way to provide a discount, with usage in the lowest two tiers and in the highest tier charged at the standard rate while usage in a "middle" tier (current Tier 3) receiving a very large 17 -cent-per-kWh discount. For its summer 2014 rate reform proposal, PG\&E proposes to simplify the FERA discount by making it a constant percentage off a FERA customer's bill calculated at standard rates, so that households will receive a discount regardless of the tier in which they are consuming. 20 PG\&E has calculated that, over the last five years, FERA customers on average have received a discount of 12.5 percent

[^9]off their bills. PG\&E is proposing the FERA discount be provided as a simple 12.5 percent discount off a bill calculated at standard rates. This proposal would replace today's confusing FERA discount structure and ensure that all FERA customers receive an identical percentage discount.

## 2. Bill Impacts

Although rate relief for upper-tier consuming households is long overdue, PG\&E recognizes that the transition to rates with fewer tiers, lower rate differentials, and lower CARE discounts will more closely align with AB 327 and result in bill increases for CARE households and lower-tier consuming non-CARE ones. Consequently, PG\&E's proposal works toward undoing the present subsidy in a series of steps, in order to manage these bill impacts.

In order to focus on the bill impacts specifically resulting from PG\&E's summer 2014 rate reform proposal, in this section (and Section C. 3 below summarizing bill impacts for CARE customers), PG\&E summarizes the change in average monthly bills going from anticipated January 2014 rates to PG\&E's summer 2014 proposed rates-since both collect the same revenue amount. The detailed bill comparison tables underlying these summaries are in Appendix D. Per the ACR, PG\&E also presents detailed bill comparisons going from present rates to its summer 2014 proposed rates in Appendix C. ${ }^{21}$

For non-CARE customers taking service on Schedule E-1, the results in Appendix D show that the effect of the rate design changes proposed by PG\&E for summer 2014 result in lower bills for some and higher bills for

21 It must be noted that the bill impacts in Appendix $C$ and $D$, were developed without accounting for the effect of the Climate Dividend that all of PG\&E's residential customers will receive beginning in 2014. This Climate Dividend is anticipated to be approximately $\$ 60$ per year for each residential customer. This bill credit is effectively the same as a $\$ 5$-per-month negative customer charge, and it must be taken into account (just as a positive $\$ 5$-per-month customer charge would) when analyzing the detailed bill comparison tables in Appendix C . The Climate Dividend does not similarly need to be accounted for when analyzing the detailed bill comparison tables in Appendix D, since both the starting point (January 2014) and ending point (Summer 2014) rates occur in 2014, so that the effect of the Climate Dividend washes out (i.e., the $\$ 5$-per-month credit would be in both, so that the dollar changes in bills shown in the tables would not be affected).
others. This is the anticipated result, since PG\&E's summer 2014 rate reform proposal is designed to provide bill relief for upper-tier consuming households who, for over a decade, have paid rates well above the class average, while beginning to increase the bills of lower-tier consuming households who have paid below-average rates. A total of 36 percent of PG\&E's customers will have lower average monthly bills under PG\&E's summer 2014 rate reform proposal. About 1 percent will see no change (or a negligible change). Of the remaining 63 percent, 40 percent would see very small average monthly increases of less than $\$ 5$ and another 21 percent would see increases of between $\$ 5$ and $\$ 10$. So 98 percent of Schedule E-1 customers would see either average monthly bill decreases or increases of less than $\$ 10$.

## C. Proposed CARE Rates

PG\&E's CARE Schedule EL-1 comprises 99 percent of all CARE households. Its optional CARE schedules-TOU Schedules EL-6 and EL-7 and seasonal Schedule EL-8-represent the remainder. In this section, PG\&E makes the following specific proposals for Schedule EL-1, which also apply to optional CARE Schedules EL-6, EL-7, and EL-8.

The legislature has determined, in AB 327, that the average CARE discount should "be no less than 30 percent and no more than 35 percent of the revenues that would have been produced for the same billed usage by non-CARE customers. . . ." The legislation also states that the utilities "shall not reduce, on an annual basis, the average effective CARE discount by more than a reasonable percentage decrease below the discount in effect on January 1, 2013. .. ." 22 Similarly, the ACR in this proceeding, issued on October 25, 2013, calling for the expedited filing of these interim rate change proposals, included among its enumerated guidelines that "rates should be adjusted as necessary to prevent CARE rates from increasing beyond the statutory effective CARE discount of 35 percent without reducing the discount more than a reasonable percentage annually."23

[^10]The summer 2014 CARE rate reform proposals PG\&E presents in this request comply with that guideline and represent an important step in implementing AB 327's intent to ultimately transition the CARE program to significantly lower, yet reasonable, discount levels, as required by the legislature. Specifically, for summer 2014, PG\&E proposes the following changes in CARE rate design for Schedules EL-1, EL-6, EL-7, and EL-8:

- Create a new CARE Tier 1 rate for usage between 0 and 100 percent of baseline, a new CARE Tier 2 rate for usage that is equal to 100 percent to 200 percent of baseline, and a new CARE Tier 3 rate for usage that is exceeds 200 percent of baseline.
- Set the EL-1 Tier 1 rate at 9.5 cents per kWh, the Tier 2 rate at 12.5 cents per kWh, and the Tier 3 rate at 17 cents per kWh.
- Adjust the tiered rates for each TOU and seasonal rate schedule in the same manner as proposed for Schedule EL-1 by changing the TOU and seasonal rates by the same cents per kWh in each tier that is proposed for Schedule EL-1.
PG\&E's proposed rates represent modest increases to CARE rates, especially given the context of how little CARE rates have increased in the last two decades. The summer 2014 rate reform proposal will result in decreases in the CARE discount for some customers. PG\&E will undertake appropriate customer education and outreach to CARE customers to minimize confusion and inform customers of the changes in the rate structure.

Table 2-4 compares past, current, filed and proposed EL-1 rates, including the effect of the Climate Dividend ${ }^{\mathbf{2 4}}$ on the annual average CARE rates in 2014. The Climate Dividend for CARE customers will result in annualized bill reductions of approximately $\$ 60^{25}$ beginning in 2014. This lowers the annual average EL-1 rate to 9.0 cents on January 1, 2014. It also results in an annual average CARE rate of 10.4 cents per kWh under PG\&E's summer 2014 rate reform proposal, just below the 10.5-cent average rate two decades ago, in 1993. Although PG\&E's proposal would increase the nominal Tier 1 rate to 9.5 cents, the net effective Tier 1 rate paid by CARE customers, after deducting

24 A.13-08-002.
25 Based on PG\&E's pending proposal with the CPUC, the annual Climate Dividend in 2014 is anticipated to be $\$ 59.62$ per residential customer. (A.13-08-002.)
the total annual Climate Dividend from total CARE Tier 1 revenues, would drop to 7.9 cents per kWh, a 5-percent decrease over the present EL-1 Tier 1 rate. Consequently, upon implementation of PG\&E's proposal, CARE customers using, on average, less than 35526 kWh per month would still see an annual average bill decrease in 2014 after accounting for the Climate Dividend.

TABLE 2-4
PACIFIC GAS AND ELECTRIC COMPANY COMPARISON OF PAST, PRESENT, FILED AND PROPOSED CARE (EL-1) RATES (\$/kWh)

| Line No. | Tier | Historical $-1993$ | $\begin{gathered} \text { Present } \\ \text { - October } \\ 2013 \end{gathered}$ | Anticipated <br> - January 2014 | $\begin{gathered} \text { Proposed } \\ \text { - Summer } \\ 2014 \\ \hline \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Tier 1 | \$0.101 | \$0.083 | \$0.085 | \$0.095 |
| 2 | Tier 2 | \$0.117 | \$0.096 | \$0.098 | \$0.125 |
| 3 | Tier 3 | \$0.117 | \$0.140 | \$0.140 | \$0.170 |
| 4 | Climate Dividend per year(a) | N/A | N/A | (\$59.62) | (\$59.62) |
| 5 | Annual Average Rate | \$0.105 | \$0.100 | \$0.090 | \$0.104 |
| 6 | Baseline Quantities(b) | 60\% | 55\% | 55\% | 50\% |

(a) The average rates shown in Line 5 in the last two columns include an adjustment for the value of the Climate Dividend which will go into effect in 2014.
(b) PG\&E has reflected in its proposed summer 2014 rates the impact of its 2012 RDW (A.12-02-020) proposal to reduce baseline quantities from 55 percent to 50 percent (the statutory minimum).

Table 2-5 compares PG\&E's present and proposed summer 2014 rates to SCE's and SDG\&E's present rates for CARE customers. PG\&E anticipates that SCE and SDG\&E may be proposing increases to their CARE rates, but until PG\&E sees those proposals, it cannot compare its own proposed rates to those proposed by the other two utilities. Nevertheless, it is instructive to compare PG\&E's proposed CARE rate levels to the CARE rates already in place for SCE and SDG\&E. The table shows that, if the comparison is limited to present rates, PG\&E's CARE rates are lower than those of the other two utilities in every single tier (and, in the case of Tier 3, substantially lower). Moreover, even PG\&E's proposed higher summer 2014 CARE rates would still be lower than SDG\&E's present CARE Tier 1 rate and equal to its CARE Tier 3 rate.
Finally, PG\&E's proposed CARE Tier 3 rate would still be 3.5 cents lower than

26 This number varies depending on the climate zone and was calculated as a weighted
average.

SCE's present CARE Tier 3 rate. In approving SCE's and SDG\&E's CARE rates currently in effect, the Commission has previously determined that these rate levels are reasonable and affordable for CARE customers in Southern California. There is no reason to believe that PG\&E's proposed CARE rates here-which are comparable or lower than the Commission-approved rates for the other two utilities-would not similarly be reasonable and affordable.

TABLE 2-5
PACIFIC GAS AND ELECTRIC COMPANY COMPARISON OF STANDARD CARE UTILITY RATES TO PG\&E'S PROPOSED RATES(a)

| Line No. | Tier | SCE <br> Present <br> (\$/kWh) | SDG\&E <br> Present (\$/kWh) | PG\&E <br> Present (\$/kWh)(b) | PG\&E <br> Proposed <br> (\$/kWh)(b) |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Tier 1 | \$0.085 | \$0.099 | \$0.083 | \$0.095 |
| 2 | Tier 2 | \$0.107 | \$0.116 | \$0.096 | \$0.125 |
| 3 | Tier 3 | \$0.205 | \$0.170 | \$0.140 | \$0.170 |
| 4 | Basic Service Fee (\$/Month) | \$0.70 | N/A | N/A | N/A |

(a) The effective dates of present rates are SCE - October 1, 2013; SDG\&E - September 1, 2013, and PG\&E - October 1, 2013.
(b) PG\&E's present rates, as of October 2013, are based on 55 percent baseline quantities. PG\&E's proposed rates for summer 2014 are based on its 50 percent baseline quantities proposal in this proceeding.

In 1993, the CARE discount in each tier was 15 percent, as was the overall average CARE discount. As PG\&E has described in this testimony, in the ensuing two decades the CARE discount has grown tremendously, with the overall average discount more than tripling to today's 48 percent level. It is anticipated to increase further to 49 percent in January 2014. If PG\&E's 2012 RDW proposal to decrease baseline quantities is approved before summer 2014, the CARE discount would decrease back to 48 percent. Finally, under PG\&E's summer 2014 rate proposal, which collects the same revenues as the January 2014 rates, the CARE discount would further decrease
to 43 percent, 27 a significant step toward reducing it ultimately to somewhere in the legislatively mandated 30 to 35 percent range.

PG\&E's proposal to reduce the average effective CARE discount will result in a reduction to the PPP rate levels by 0.2 cents per kWh for all residential and non-residential customers who pay this rate component.

## 1. CARE Rates Remain at a Large Real Discount Compared to Those Charged in 1993

Over the last two decades, CARE rates slipped further and further below the cost of service and the rate of inflation. As Table 2-4 shows, the present average CARE EL-1 rate of 10.0 cents is, in nominal terms, below the EL-1 average rate of 10.5 cents charged back in 1993. In real terms, it is much lower today than two decades ago. Figure 2-1 shows that if the 10.5-cent-per-kWh average CARE rate in 1993 had simply increased each year with the rate of inflation, it would be 17.0 cents per kWh today. ${ }^{28}$ Instead, it is just 10.0 cents per kWh. This represents over a 40 percent increase in the average CARE rate in real terms over the last 20 years. Clearly, electricity has become much more affordable for CARE customers in real terms, due to nominal CARE rates slightly decreasing while other prices in the economy and household incomes rose in nominal terms with inflation. PG\&E's summer 2014 proposed CARE rates will bump the average CARE rate up slightly from 10.0 to 10.4 cents per kWh. However, it will remain far below the 17.0-cent nominal level rate in 2013 that is

27 Both the anticipated January 2014 and the proposed summer 2014 discount figures account for the effect of the Climate Dividend which goes into effect starting in 2014. (See footnote 2 of this chapter.) As noted, these two CARE discount percentages were calculated based upon rates designed to collect the same revenues that would be collected at anticipated January 2014 rates. Changes in the revenue requirement, though, can result in changes in the CARE discount percentages. But regardless of the level of the revenue requirement, PG\&E's proposed rate reforms will result in an improvement in the CARE discount percentage (i.e., a reduction toward the legislatively mandated range). For example, using rates designed under the current (unreformed) rate structure, but collecting the higher 2013 revenue level associated with PG\&E's 2013 Integrated Energy Policy Report (IEPR) forecast submitted to the California Energy Commission in June 2013, the CARE discount percentage would increase to 53 percent. However, using the summer 2014 (reformed) rate structure that collects that same IEPR revenue amount, the CARE discount is 48 percent.
28 A 1.44 percent inflation rate is assumed for 2013, per Global Insight's Q1 2013 US Economy Forecast.
 equivalent, in real terms, to the CARE rate level approved by the Commission in 1993.

FIGURE 2-1
PACIFIC GAS AND ELECTRIC COMPANY
AVERAGE CARE (EL-1) RATE vs. CONSUMER PRICE INDEX (CPI) 1993 TO 2013

## 2. The Proposed CARE Rates Would Improve a Weak Conservation Incentive

Since CARE rates have remained largely constant for 20 years as prices and incomes grew with inflation, there has been a declining incentive for CARE customers to conserve. PG\&E's CARE Tier 1 and Tier 2 rates are currently set very low. Both are 18 percent below nominal levels in 1993. In addition, despite the modest increase to CARE Tier 3 rates implemented in January 2013, PG\&E's current CARE Tier 3 rates remain very low and do not provide as strong an incentive for conservation among high usage CARE customers as they should. PG\&E's proposed CARE rate increases will help incent conservation by ensuring that all CARE rates move closer to

PG\&E's average residential rate, and thus better reflect the actual cost to serve these customers.

As Table 2-6 shows, total discounts received by CARE customers in the 12 months ending August 2013 were $\$ 750$ million. 29 More than three-quarters of the CARE discount, $\$ 580$ million, went to CARE customers with usage in Tier 4 or higher (usage exceeding 200 percent of baseline). As a result of the currently low upper-tier rates they receive, most CARE customers exceeding 200 percent of baseline still have little incentive to conserve. ${ }^{30}$ PG\&E's summer 2014 rate reform proposal, with its proposed 3-cent-per-kWh increase to CARE Tier 3 rates, will provide a much greater incentive to high-use CARE customers to conserve, and is therefore likely to reduce the overall cost of the CARE program.

TABLE 2-6
PACIFIC GAS AND ELECTRIC COMPANY CARE HOUSEHOLDS AND ELECTRIC DISCOUNTS THROUGH AUGUST 2013(a)

| Line No. | Highest Monthly Tier Reached Over 12 Months | CARE <br> Households | Total CARE Discounts | \% of CARE <br> Households | \% of CARE Discounts |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Tier 1 | 220,000 | \$30,000,000 | 18\% | 4\% |
| 2 | Tier 2 | 150,000 | \$30,000,000 | 12\% | 4\% |
| 3 | Tier 3 | 340,000 | \$110,000,000 | 27\% | 14\% |
| 4 | Tier 4(b) | 320,000 | \$200,000,000 | 25\% | 27\% |
| 5 | Tier 5(c) | 140,000 | \$160,000,000 | 11\% | 22\% |
| 6 | Tier 6(d) | 80,000 | \$220,000,000 | 7\% | 29\% |
| 7 | CARE Total | 1,250,000 | \$750,000,000 | 100\% | 100\% |

(a) 12 months ending August 2013. This data does not reflect the gradual removal of CARE customers exceeding 400 percent of baseline in any given month, per D.12-08-044, beginning September 2013.
(b) The Tier 4 group includes customers using between 200 percent and 300 percent of baseline for at least one month.
(c) The Tier 5 group includes customers using between 300 percent and 400 percent of baseline for at least one month.
(d) The Tier 6 group includes customers with usage exceeding 400 percent of baseline for at least one month.

29 The CARE discount is calculated by multiplying CARE sales by tier times the total difference in E-1 rates vs. EL-1 rates.
30 The present CARE Tier 3 rate of 14.0 cents per kWh is still 18 percent below the average residential rate of 17.0 cents per kWh.

Table 2-7 shows the explosive growth in CARE participation and total electric discounts since 2000. The number of households has increased more than 4 times while the total discounts have increased 25 times.

TABLE 2-7
PACIFIC GAS AND ELECTRIC COMPANY CARE PARTICIPANTS AND DISCOUNTS SINCE 2000
$\left.\begin{array}{cccccc}\begin{array}{c}\text { Line } \\ \text { No. }\end{array} & & \text { Year } & & \begin{array}{c}\text { CARE } \\ \text { Households }\end{array} & \end{array} \begin{array}{c}\text { Total CARE } \\ \text { Discounts }\end{array}\right]$
(a) 12 months ending August 2013. The year-end total in December will be lower as customers exceeding 400 percent of baseline in any given month are gradually removed from the program, beginning in September.

Finally, as Figure 2-2 shows, CARE average usage increased at a significantly faster rate than non-CARE usage from 2001 to 2010, on a climate-adjusted basis. 31 Where the average non-CARE usage had exceeded the average CARE usage by 110 kWh per month in 2001, that gap has been cut by 40 percent, even after removing from the calculation all CARE customers who exceeded 400 percent of baseline in a single month.

31 In total, CARE customers actually use considerably more than non-CARE customers on a per-household basis, but this is because of the significantly higher percent of Central Valley customers who are low income. Therefore, PG\&E climate-adjusts the data by assigning weights to CARE usage from each climate zone based on its percent of the total population, not the CARE population.

FIGURE 2-2
PACIFIC GAS AND ELECTRIC COMPANY
CLIMATE ADJUSTED AVERAGE MONTHLY USAGE, NON-CARE vs. CARE 2001 TO 2012(a)

(a) Excludes CARE customers exceeding 400 percent of baseline for at least one month per year.

## 3. Bill Impacts

The bill impacts are modest for most CARE customers.
Forty-three percent of CARE customers would see an average monthly bill increase of between $\$ 0$ and $\$ 5$. Another 36 percent would see an increase of between $\$ 5$ and $\$ 10$ per month. Only 21 percent would see bill increases greater than $\$ 10$ per month. The detailed bill comparison tables underlying this summary are in Appendix D.

## D. Optional Schedules Rate Design

As previously described, PG\&E is proposing to collapse Tiers 2 and 3 and to narrow the differential between the rates for the top and bottom tiers for its standard non-CARE (Schedule E-1) and CARE (EL-1) rates. PG\&E also proposes to adjust the tiered rates for each voluntary schedule (TOU Schedules E-6, EL-6, E-7, EL-7 and E-9, as well as the seasonal rate Schedule E-8 and EL-8) in a similar manner as proposed for standard tiered rates. This is accomplished by changing the TOU and seasonal rates for each tier by the same cents per kWh change proposed for E-1 (non-CARE schedules)
and EL-1 (CARE schedules). For example, PG\&E is proposing a 0.9 cent increase in the E-1 Tier 1 rate between January 2014 and summer 2014. This same 0.9-cent-per-kWh increase is proposed for the Tier 1 rates on Schedule E-6 for each TOU period. Similarly, PG\&E is proposing a $0.9-c e n t$ increase in the EL-1 Tier 1 rate between January 2014 and summer 2014. The same 0.9 cent per kWh increase is proposed for the Tier 1 rates on Schedule EL-6 for each TOU period. Similar adjustments are to be made to the other tier rates consistent with the changes proposed for Schedule E-1 and EL-1. 32 See Appendix B for summaries of the January 2014 versus summer 2014 proposed rates.

## E. Electric Baseline Quantities

Baseline quantities are the designated daily amounts of electricity and gas that are considered necessary to supply a significant portion of the reasonable energy needs of the average residential customer. In this summer 2014 rate reform filing, PG\&E is requesting that the CPUC adopt updated electric baseline quantities using more current usage data for each climate zone. (PG\&E is not proposing natural gas baseline quantity updates here pursuant to the November 6, 2013 email ruling of ALJ Long in PG\&E's 2014 GRC Phase II proceeding (A.13-04-012) ordering that PG\&E's proposed gas baseline quantities continue to be heard in that proceeding.)

For its electric baseline quantity update, PG\&E proposes to continue using the currently-adopted methodology, per Decision 02-04-026, which resolved the Commission Baseline Rulemaking 01-05-047. This method averages four calendar years ${ }^{33}$ of bill frequency-derived baseline quantities. The current methodology also adjusts for seasonal and vacation home usage, per Decision 04-02-057, as modified in Decision 07-09-004. PG\&E's proposal here uses four years of seasonal data, May 2008 through April 2012, as originally filed in PG\&E's 2014 GRC Phase II proceeding. PG\&E's electric baseline quantities were last adjusted in Decision 11-05-047 and implemented on June 20, 2011. At that time, the CPUC also changed the percentage to

[^11]55 percent of average usage, except for all-electric and gas baseline quantities in the winter season, which were set at 65 percent of average usage.

The CPUC has already heard PG\&E's proposal to reduce the electric baseline percentage in its pending 2012 RDW proceeding (A.12-02-020) namely to set the electric baseline quantities at 50 percent of average usage. 34 If adopted in that proceeding, PG\&E's electric baseline quantities would be set at the low end of the range allowed by law. The 2012 RDW has been fully litigated and is pending a Proposed Decision. 35

Table 2-8 compares the usage and percent of total electric usage by tier forecasted for 2014 for both non-CARE and CARE customers using baseline quantities revised at the current 55 percent level versus the proposed 50 -percent level. ${ }^{36}$

TABLE 2-8
PRESENT AND PROPOSED PERCENT USAGE BY TIER

| Line No. | Tier | Non-CARE Present | Non-CARE Proposed | CARE <br> Present | CARE <br> Proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Tier 1 | 57.7\% | 52.2\% | 61.7\% | 56.3\% |
| 2 | Tier 2 | 11.2\% | 11.1\% | 10.5\% | 10.6\% |
| 3 | Tier 3 | 31.1\% | 36.7\% | 27.8\% | 33.1\% |
| 4 | Total | 100.0\% | 100.0\% | 100.0\% | 100.0\% |

(a) Present and proposed percentages are based on forecasted 2014 sales.

As was shown in the testimony received into evidence in Application 12-02-020, reducing the electric baseline quantities to the 50 percent level would lower upper tier non-CARE rates by increasing the amount of upper tier usage over which revenue increases can be spread. Setting PG\&E's baseline quantities at 50 percent, as PG\&E proposes, causes usage exceeding 130 percent of baseline to increase from about 31 percent of non-CARE usage to about 37 percent, with a similar increase for CARE customers. Without the

34 Except for all-electric baseline quantities in the winter season, which PG\&E propose to set at 60 percent of average usage, per Pub. Util. Code Section 739(a)(1).
35 PG\&E has already made a fully litigated showing supporting a reduction to a 50 baseline in its 2012 RDW (A.12-02-020).
36 This proposed winter all-electric baseline quantities would be 60 percent vs. the current 65 percent, consistent with what PG\&E requested in its 2012 RDW application.
proposed changes in baseline quantities, PG\&E's proposed non-CARE Tier 2 rates would need to increase by roughly 2.8 cents per kWh while all CARE rates would need to increase by 0.2 cents per kWh.

PG\&E proposes two additional changes to how it calculates electric baseline quantities for two territories with significant anomalies.

## 1. Territory V (Humboldt Area) High Usage Adjustment

The first change relates to Territory V (the Humboldt County coast), where skyrocketing electric usage has caused baseline quantities to spike. Territory V is a coastal climate zone and northerly counterpart to Territory T , the coastal climate zone stretching southward from the Humboldt County border to Santa Barbara. These two territories' usage levels have been historically similar back to 1993 when the basic electric baseline quantities for Territory V were slightly higher than Territory T. 37 However, since 2000, average usage in Territory V , which is used to set baseline quantities, has climbed 38 percent while system-wide residential average usage has declined by 3 percent.

As a result of significant increases in Territory V usage, Territory V would receive some of the highest baseline quantities on PG\&E's system unless action is taken as PG\&E proposes. Although enrolled on residential rates, the usage of many Territory V customers seems more analogous to a medium size commercial account. PG\&E compared the number of customers exceeding 400 percent of baseline in Territory V to Territory T and found that there was a significantly higher percentage of these customers in Territory V , and that their average usage was also considerably higher than in Territory T .

The Commission has already recognized the issue of exorbitant usage among a minority of CARE customers in Decision 12-08-044 (some of whom

[^12]are believed to be indoor marijuana growers). ${ }^{38}$ Regardless of the various causes of this usage spike in Territory V , however, the fact that this usage spike did not occur in any other climate zone shows that it is not the result of typical residential usage.

To mitigate the impact of this typical usage on baseline quantities in Territory V, PG\&E recalculated these baseline quantities after removing the highest 2.94 percent of basic and 5.30 percent of all-electric Territory V bills so that the remaining percentage of bills in the 400 percent of baseline category equals the same percentage in Territory T , the climate zone most similar to Territory V. 39

Although this adjustment is data driven and would not be precedential for the future, the CPUC has taken such actions in the past. The CPUC has already approved special adjustments to baseline calculations to remove customers with anomalously low usage levels when it authorized PG\&E to remove bills from baseline calculations to account for vacation and seasonal homes, as well as all-electric customers who use wood or propane as their primary source of heating. Adjusting bills used in baseline calculations to remove the effects of atypical usage further enables baseline quantities to be set according to the intent of the baseline statute, Pub. Util. Code Section 739.(b), which provides that "[T]he commission shall designate a baseline quantity of gas and electricity which is necessary to supply a significant portion of the reasonable energy needs of the average residential customers. The commission shall also take into account differentials in energy use by climactic zone and season."

As a result of this change in methodologies, Territory V baseline quantities would drop an average of 29 percent. However, the absolute gap between Territory V and Territory T baseline quantities would remain substantially higher than it was in 1993.

[^13]39 PG\&E used Territory T for comparison because warmer climate zones, especially those in the Central Valley, have very different usage patterns than coastal zones.

## 2. Align Territory Q Winter Baseline With Territory $\mathbf{P}$

PG\&E proposes to change the method for determining baseline quantities in Territory $Q$, a subset of Territory $T$ that covers approximately 3,600 customers in the Santa Cruz Mountains. Currently, Territory Q has the same baseline quantities as Territory $T$ in the summer, but is assigned the moderately higher Territory X baseline quantities in the winter. This change was made in 1989 to reflect the significantly colder winter climate in the Santa Cruz Mountains relative to the rest of coastal Territory $T$, due to the 1,500 foot or higher elevation of its communities. This colder weather is most acutely felt by all-electric customers who use electricity as their primary source of space heating and comprise two-thirds of the customers in Territory Q.

However, because it is the elevation of the Santa Cruz Mountains that drives higher electric use in the winter, not location, PG\&E believes that it is more appropriate to assign Territory P's higher baseline quantities to Territory Q in the winter, since Territory P's climate more closely matches that of Territory Q in the winter. Like Territory Q , Territory P is a higher elevation climate zone. Territory P includes both Lake County and the Sierra foothills. Its Lake County communities are quite similar to Territory Q communities in that they are just under the 1,500 foot elevation. Its Sierra foothill communities are virtually all within the 1,500 foot to 3,000 foot elevation range.

PG\&E's proposal to change Territory Q's winter baseline to that of Territory P would increase winter baseline quantities for the 3,600 customers in Territory $Q$ by 14 percent for basic customers and 81 percent for all-electric customers, compared to Territory $X$ winter baseline quantities. This increase would more accurately reflect the colder winter climate in Territory $Q$ as compared with Territory X. Currently, average all-electric winter usage in Territory $Q$ is more than double that of Territory $X$, while average basic electric usage in Territory $Q$ is more than a third higher than Territory $X$. Thus Territory $P$ 's winter baseline quantities are more appropriate for use in Territory Q, as PG\&E proposes.

## 3. Implementation Timing

PG\&E proposes to implement the proposed electric baseline quantities in one step on the first day of the next available season after the effective date of this decision, which should be May 1, 2014.40 PG\&E's proposed target baseline quantities for individually metered and master meter gas and electric customers are shown in Table 2-9.

TABLE 2-9
PACIFIC GAS AND ELECTRIC COMPANY RESIDENTIAL ELECTRIC TARGET BASELINE QUANTITIES BASED ON 2008-2012 USAGE(1)

| TERRITORY | SUMMER (2) |  |  | WINTER (2) |  |  | SUMMER (2) |  |  | WINTER (2) |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{gathered} 55 \% \\ \text { Daily } \end{gathered}$ | $\begin{gathered} 50 \% \\ \text { Daily } \\ \hline \end{gathered}$ | Pctg <br> Chg. | $\begin{aligned} & 55 \% \\ & \text { Daily } \\ & \hline \end{aligned}$ | $\begin{gathered} 50 \% \\ \text { Daily } \\ \hline \end{gathered}$ | Pctg. <br> Chg. | $\begin{gathered} 55 \% \\ \text { Daily } \\ \hline \end{gathered}$ | $\begin{gathered} 50 \% \\ \text { Daily } \\ \hline \end{gathered}$ | Pctg. Chg. | $\begin{gathered} 55 \% \\ \text { Daily } \end{gathered}$ | $\begin{gathered} 50 \% \\ \text { Daily } \end{gathered}$ | Pctg. Chg. |
|  | E-1, E-6, E-7, E-A7, E-8, E-9, ES, ESR, ET (3) (and CARE) |  |  |  |  |  | $\begin{gathered} \text { EM (4) } \\ \text { (and CARE) } \end{gathered}$ |  |  |  |  |  |
|  | ALL-ELECTRIC QUANTITIES (kWh) |  |  |  |  |  | ALL-ELECTRIC QUANTITIES (kWh) |  |  |  |  |  |
| P | 18.0 | 15.5 | -13.9\% | 33.9 | 28.3 | -16.5\% | 10.2 | 8.6 | -15.7\% | 18.0 | 14.7 | -18.3\% |
| Q | 9.1 | 7.8 | -14.3\% | 19.3 | 28.3 | 46.6\% | 5.8 | 5.2 | -10.3\% | 15.1 | 14.7 | -2.6\% |
| R | 20.9 | 17.8 | -14.8\% | 30.2 | 28.5 | -5.6\% | 10.3 | 8.7 | -15.5\% | 16.4 | 14.5 | -11.6\% |
| S | 18.0 | 15.5 | -13.9\% | 28.6 | 25.8 | -9.8\% | 10.2 | 8.6 | -15.7\% | 16.4 | 14.4 | -12.2\% |
| T | 9.1 | 7.8 | -14.3\% | 16.8 | 13.9 | -17.3\% | 5.8 | 5.2 | -10.3\% | 10.9 | 9.3 | -14.7\% |
| V | 19.4 | 12.8 | -34.0\% | 33.4 | 25.3 | -24.3\% | 11.5 | 7.6 | -33.9\% | 18.9 | 14.1 | -25.4\% |
| W | 23.5 | 19.6 | -16.6\% | 22.8 | 19.3 | -15.4\% | 11.4 | 10.0 | -12.3\% | 14.3 | 12.1 | -15.4\% |
| X | 10.3 | 8.7 | -15.5\% | 19.3 | 15.6 | -19.2\% | 8.1 | 7.1 | -12.3\% | 15.1 | 13.2 | -12.6\% |
| Y | 14.1 | 12.3 | -12.8\% | 30.7 | 25.6 | -16.6\% | 8.7 | 7.7 | -11.5\% | 20.9 | 16.7 | -20.1\% |
| Z | 11.2 | 7.2 | -35.7\% | 22.5 | 17.5 | -22.2\% | 6.9 | 4.5 | -34.8\% | 15.2 | 11.5 | -24.3\% |
|  | BASIC QUANTITIES (kWh) |  |  |  |  |  | BASIC QUANTITIES (kWh) |  |  |  |  |  |
| P | 15.3 | 13.1 | -14.4\% | 12.7 | 11.7 | -7.9\% | 6.6 | 5.6 | -15.2\% | 6.1 | 5.3 | -13.1\% |
| Q | 7.5 | 6.7 | -10.7\% | 11.7 | 11.7 | 0.0\% | 4.2 | 3.8 | -9.5\% | 6.7 | 5.3 | -20.9\% |
| R | 17.1 | 14.7 | -14.0\% | 11.7 | 10.5 | -10.3\% | 7.4 | 6.3 | -14.9\% | 5.8 | 5.0 | -13.8\% |
| S | 15.3 | 13.1 | -14.4\% | 12.0 | 10.6 | -11.7\% | 6.6 | 5.6 | -15.2\% | 5.6 | 4.9 | -12.5\% |
| T | 7.5 | 6.7 | -10.7\% | 9.1 | 8.0 | -12.1\% | 4.2 | 3.8 | -9.5\% | 5.2 | 4.6 | -11.5\% |
| V | 12.0 | 8.3 | -30.8\% | 13.6 | 10.0 | -26.5\% | 5.4 | 4.1 | -24.1\% | 6.5 | 5.0 | -23.1\% |
| W | 18.5 | 15.9 | -14.1\% | 10.9 | 9.6 | -11.9\% | 8.1 | 7.0 | -13.6\% | 6.1 | 5.3 | -13.1\% |
| X | 11.0 | 9.6 | -12.7\% | 11.7 | 10.3 | -12.0\% | 5.9 | 5.2 | -11.9\% | 6.7 | 5.9 | -11.9\% |
| Y | 11.7 | 10.0 | -14.5\% | 13.2 | 11.9 | -9.8\% | 8.6 | 8.2 | -4.7\% | 8.6 | 7.8 | -9.3\% |
| Z | 7.9 | 5.8 | -26.6\% | 10.6 | 8.4 | -20.8\% | 5.8 | 4.8 | -17.2\% | 6.9 | 5.6 | -18.8\% |

(1) Data is from May 2008 through April 2012.
(2) The Summer season is May through October. The Winter season is November through April.
(3) These baseline allowances cover 98 percent of electric households in PG\&E's service territory.
(4) These baseline allowances cover 2 percent of electric households in PG\&E's service territory.

40 Electric baseline quantities change every May 1 and November 1 to reflect the change in seasons. Gas baseline quantities change every April 1 and November 1.

## F. Rate Changes Between Cases

Currently, major structural changes to PG\&E's rates are typically made in Commission rate-related cases like GRC Phase II or RDW proceedings-or like here, in the instant proceeding. However, rate changes can occur at more frequent intervals than this. To handle such changes, the Commission typically adopts a set of rules in PG\&E's GRC Phase II cases for how to perform rate changes between cases. One simple rule that has been used for non-residential rate schedules is to increase or decrease all energy and demand rates by the same identical percentage required in order to collect an increased or decreased revenue requirement. Here PG\&E proposes that a similar "equal percentage change" approach be used -- with two exceptions to ensure continued progress towards narrowing tier differentials and reducing the CARE discount percentage toward the legislatively mandated range. Specifically, PG\&E proposes the following two rules, one applicable to increases in the revenue requirement and the other applicable to decreases: 41

- In the case of revenue requirement increases, the non-CARE Tier 3 rate would remain at 35.0 cents per kWh and all other rates (i.e., the non-CARE Tier 1 and 2 rates, along with the CARE Tier 1, 2, and 3 rates) would be increased by an equal percentage so as to collect the incremental revenue amount.
- In the case of revenue requirement decreases, the CARE rates would remain at their then-current levels and all other rates (i.e., the non-CARE Tier 1, 2 and 3 rates) would be decreased by an equal percentage so as to collect the lower revenue amount.

These "equal percentage change" rules would be used until the Commission adopts a different set of rate designs in a future rate proceeding (e.g., in a subsequent phase of this proceeding devoted to rate reforms in 2015 and beyond).

41 Both rules are subject to the proviso that the resulting CARE discount percentage
cannot be lower than 30 percent.

## PACIFIC GAS AND ELECTRIC COMPANY APPENDIX A

RATE COMPARISON: PRESE NT (OCTOBER 1, 2013) VERSUS PROPOSED SUMMER 2014 (MAY 1, 2014) RATES


EsR
Energy Charge (\$kyh) Easeline Usage
$101 \%$ - $130 \%$ of Baseline
$131 \%$. $200 \%$ of Baselinn Over $30 \% \%$ of Baseline
minimum charge
(\$imeterchay)
(\$.kwn)

ет
ENERGY CHARGE (SKWVM)
Baseline Usage
101\% - $130 \%$ of Baseline
$131 \%-200 \%$ of Baselline
$201 \%-300 \%$ of Baseline
Over 300\% of Baseline
minimum charge
(simeterday
DISCOUNT (Stdaveling unitcday)


| PRESENT ( $10 / 01 / 2013$ ) RATES |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Distr | Gen | ppp | AB32 Credit | CIA | Other | Total |  |
| . 07297 | . 07884 | . 01452 | . 00000 | (.06131) | . 02728 | . 13230 |  |
| . 07297 | . 07884 | . 01452 | . 00000 | (.04321) | . 02728 | . 15040 |  |
| . 07297 | . 07884 | . 01452 | . 00000 | . 12555 | . 02728 | . 31915 |  |
| . 07297 | . 07884 | . 01452 | . 00000 | . 16555 | . 02728 | . 35916 |  |
| . 07297 | . 07884 | . 01452 | . 00000 | . 16555 | . 02728 | . 35916 |  |
| . 12597 | * | . 00748 |  |  | . 00026 | . 14784 | 450 |
|  |  |  |  |  | . 02693 |  |  |
| Distr | Gen | ppp | AB32 Credit | CIA | Other | Tolal |  |
| . 07297 | . 07884 | . 01452 | . 00000 | (.06131) | . 02728 | . 13230 |  |
| . 07297 | . 07884 | . 01452 | . 00000 | (.04321) | . 02728 | . 15040 |  |
| . 07297 | . 07884 | . 01452 | . 00000 | . 12555 | . 02728 | . 31915 |  |
| . 07297 | . 07884 | . 01452 | . 00000 | . 16555 | . 02728 | . 35916 |  |
| . 07297 | . 07884 | . 01452 | . 00000 | . 16555 | . 02728 | . 35916 |  |
| . 12597 | * | . 00748 |  |  | $\begin{aligned} & .00026 \\ & .02693 \end{aligned}$ | . 14784 | 450 |
| . 07721 |  |  |  |  |  | . 07721 | 235 |
|  | . 03905 |  |  |  | . 00987 | . 04892 |  |
| * | Ikul |  |  |  |  |  |  |


| Distr | Gen | PPP | AB32 Credit | C1A | Olher | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| .06982 | .09255 | .01272 | .00000 | $(.05225)$ | .02716 | .15000 |
| .06982 | .09255 | .01272 | .00000 | $(.00328)$ | .02716 | .19897 |
| .06982 | .09255 | .0272 | $(.01506)$ | .01178 | .0276 | .19997 |
| .06982 | .09255 | .01272 | $(.01506)$ | .16281 | .02716 | .35000 |
| .06982 | .09255 | .01272 | $(.01506)$ | .16281 | .02716 | .55000 |
|  |  |  |  |  |  |  |
| .11623 | $*$ | .00639 |  |  | .00025 | .14784 |
|  |  |  |  |  | .02693 |  |

450 .





| EVA (Electric Vehicles) | PRESENT ( $10 / 01 / 2013$ ) RATES |  |  |  |  |  |  | PROPOSED SUMMER 2014 RATES |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Distr | Gen | PPP | AB32 Credit | CIA | Ofler | Total | Distr | Gen | PPP | ${ }^{\text {AB32 }}$ Credit | CIA | Other | Total |
| Energy charge (skwt) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Summer |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Peak | . 15030 | . 18909 | . 01452 | 00000 | . 00000 | . 02728 | . 38119 | . 13621 | . 21060 | . 01272 | (.00550) | . 00000 | . 02716 | . 38120 |
| Part-Peak | . 07515 | . 09113 | . 01452 | . 00000 | . 00000 | . 02728 | . 20808 | . 06811 | . 10149 | . 01272 | (.00550) | . 00000 | . 02716 | . 20398 |
| Off-Peak | . 01082 | . 04579 | . 01452 | . 00000 | . 00000 | . 02728 | . 09841 | . 00981 | . 05100 | . 01272 | (.00550) | . 00000 | . 02716 | . 09519 |
| Winter |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Part-Peak | 16146 | . 07066 | . 01452 | 00000 | . 00000 | . 02728 | . 27392 | . 14632 | . 07870 | . 01272 | (.00550) | . 00000 | . 02716 | . 25941 |
| Pat-Peak | 08073 | . 04414 | . 01452 | 00000 | . 00000 | . 02728 | . 16667 | . 07316 | . 04916 | . 01272 | (.00550) | . 00000 | . 02716 | . 15671 |
| опt-Peak | . 01163 | . 04743 | . 01452 | .00000 | . 00000 | . 02728 | . 10086 | . 01054 | . 05282 | . 01272 | (.00550) | . 00000 | . 02716 | . 09774 |
| minimum charge |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| (simeterday) | 12597 |  |  |  |  |  |  | 11623 |  |  |  |  |  | 14784 |
| (\$ $\mathrm{k}^{\text {W/M }}$ ) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Energy charge (Skwn) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Summer |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Peak | . 14501 | . 18909 | . 01452 | .00000 | . 00000 | . 02728 | . 37590 | . 13084 | . 21060 | . 01272 | (.00550) | . 00000 | . 02716 | . 37583 |
| Part-Peak | . 07250 | . 09113 | . 01452 | 00000 | . 00000 | . 02728 | . 20543 | . 06542 | . 10149 | . 01272 | (.00550) | . 000000 | . 027716 | . 20130 |
| Oit-Peak | . 01044 | . 04579 | . 01452 | 00000 | . 00000 | . 02728 | . 09803 | . 00942 | . 05100 | . 01272 | (.00550) | . 00000 | . 02716 | . 09481 |
| winter |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| PattPeak | . 15577 | . 07066 | . 01452 | . 00000 | . 00000 | . 02728 | . 26823 | . 14056 | . 07870 | . 01272 | (.00550) | . 00000 | . 02716 | . 25364 |
| Part-Peak | . 07788 | . 04414 | . 01452 | . 00000 | . 00000 | . 02728 | . 16382 | . 07028 | . 04916 | . 01272 | (.00550) | . 00000 | . 02716 | . 15382 |
| Off-Peak | . 01122 | . 04743 | . 01452 | .00000 | . 00000 | . 02728 | . 10045 | . 01012 | . 05282 | . 01272 | (.00550) | . 00000 | . 02716 | . 09733 |


|  | PRESENT (10/01/2013) RATES |  |  |  |  |  |  | PROPOSED SUMMER 2014 RATES |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| EL-1 | Distr | Gen | ppp | AB32 Creait | CIA | Other | Total |  | Distr | Gen | ppp | AB32 Creait | Cla | Oflher | Total |  |
| ENERGY CHARGE (skkht) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Baseine Usage | . 00074 | . 07884 | . 00607 | . 00000 | (.02484) | . 02235 | . 08316 |  | 00404 | . 09255 | . 00647 | . 00000 | (.03010) | . 02204 | . 09500 |  |
| 101\% - $130 \%$ of Baseline | . 00074 | . 07884 | . 06607 | . 00000 | (.01237) | . 02235 | . 09563 |  | 00404 | . 09255 | . 06647 | . 00000 | (.00010) | . 02204 | . 12500 |  |
| 131\%-200\% of Baseline | . 00074 | . 07884 | . 00607 | . 00000 | . 03174 | . 02235 | . 13974 |  | . 00404 | . 09225 | . 00647 | . 00000 | (.00010) | . 02204 | . 12500 |  |
| 201\% - 30\% of Baseline | . 00074 | . 07884 | . 00607 | . 00000 | . 03174 | . 02235 | . 13974 |  | . 00404 | . 09255 | . 00647 | .00000 | . 04490 | . 02204 | . 17000 |  |
| Over $300 \%$ of Baseline | . 00074 | . 07884 | . 00607 | . 00000 | . 03174 | . 02235 | . 13974 |  | 00404 | . 09255 | . 00647 | . 00000 | . 04490 | . 02204 | . 17000 |  |
| minmum charge |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| (\$imeerrcay) | . 09626 | * | . 00335 |  |  | . 00028 | . 11828 | 3.69 | . 08674 | * | . 00373 |  |  | . 00028 | . 11828 | 360 |
| (s.kwn) |  |  |  |  |  | . 02200 |  |  |  |  |  |  |  | . 02200 |  |  |
| EmL |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ENERGY CHARGE (SkWh) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Baseline Usage | . 00074 | . 07884 | . 00607 | .00000 | (02484) | . 02235 | . 08316 |  | . 00404 | . 09255 | . 00647 | 00000 | (.03010) | . 02204 | 09500 |  |
| 101\%-130\%\% of Baseline | . 00074 | . 07884 | . 00507 | . 00000 | (.01237) | . 02235 | . 09563 |  | . 00404 | . 09255 | . 00647 | 00000 | (.00010) | . 02204 | . 12500 |  |
| $131 \%$ - $200 \%$ of Baseline | . 00074 | . 07884 | . 00507 | . 00000 | . 03174 | . 02235 | . 13974 |  | . 00404 | . 09255 | . 00647 | . 00000 | (.00010) | . 02204 | . 12500 |  |
| 201\% - 300\% of Baseline | . 00074 | . 07884 | . 00607 | . 00000 | . 03174 | . 02235 | . 13974 |  | . 00404 | . 09255 | . 00647 | . 00000 | . 04490 | . 022204 | . 17000 |  |
| Over $300 \%$ of Baseline | . 00074 | . 07884 | . 00507 | . 00000 | . 03174 | . 02235 | . 13974 |  | . 00404 | . 09255 | . 00547 | 00000 | . 04490 | . 02204 | . 17000 |  |
| minimum Charge |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| (Simeterday) | . 09626 | * | . 00335 |  |  | . 00028 | 11828 | 369 | 08674 | * | . 00373 |  |  | . 00028 | . 11828 | 360 |
| ( $(1.1$ Wht |  |  |  |  |  | . 02200 |  |  |  |  |  |  |  | . 02200 |  |  |
| ESL |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\begin{aligned} & \text { ENERGY CHARGE (SKMWh) } \\ & \text { CARE } \end{aligned}$ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| © Baseline Usage | .00074 | . 07884 | . 00607 | .00000 | (02484) | . 02235 | . 08316 |  | . 00404 | . 09255 | . 00647 | 00000 | (.03010) | . 02204 | 09500 |  |
| 101\% - 130\% of Baseline | . 00074 | . 07884 | . 00607 | . 00000 | (.01237) | . 02235 | 09563 |  | . 00404 | . 09255 | . 00647 | 00000 | (00010) | . 02204 | . 12500 |  |
| 131\%-200\% of Baseline | . 00074 | . 07884 | . 00507 | . 00000 | . 03174 | . 02235 | . 13974 |  | . 00404 | . 09255 | . 00647 | 00000 | (.00010) | . 02204 | . 12500 |  |
| 201\%-300\% of Baseline | . 00074 | . 07884 | . 00607 | . 00000 | . 03174 | . 02235 | . 13974 |  | . 00404 | . 09255 | . 00647 | . 00000 | . 04490 | . 02204 | . 17000 |  |
| Over 300\% of Basaline | . 00074 | . 07884 | . 00607 | . 00000 | . 03174 | . 02235 | . 13974 |  | . 00404 | . 09255 | . 00647 | . 00000 | . 04490 | . 02204 | . 17000 |  |
| Non-CARE |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Baseiline Usage | . 07297 | . 07884 | . 01452 | . 00000 | (06131) | . 02728 | . 13230 |  | . 06982 | . 09255 | . 01272 | 00000 | (05225) | . 02716 | . 15000 |  |
| 101\% - 130\% of Baseline | . 07297 | . 07884 | . 01452 | . 00000 | (.04321) | . 02728 | . 15040 |  | . 06982 | . 09255 | . 01272 | .00000 | (.00328) | . 02716 | . 19897 |  |
| $131 \%$ - $200 \%$ of Baseline | . 07297 | . 07884 | . 01452 | . 00000 | . 12555 | . 02728 | . 31916 |  | . 06982 | . 09255 | . 01272 | (.01506) | . 01178 | . 02716 | . 19897 |  |
| 201\%-300\% of Baseline | . 07297 | . 07884 | . 01452 | . 00000 | . 16555 | . 02728 | . 35916 |  | . 06982 | . 09255 | . 01272 | (.01506) | . 16281 | . 02716 | 35000 |  |
| Over $300 \%$ of Baseline | . 07297 | . 07884 | . 01452 | . 00000 | . 16555 | . 02728 | . 35916 |  | . 06982 | . 09255 | . 01272 | (.01506) | . 16281 | . 02716 | . 35000 |  |
| minimum Charge |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| (simeterday) | . 09626 | * | . 00335 |  |  | . 00028 | . 11828 | 369 | 08674 | * | . 00373 |  |  | . 00028 | . 11828 | 360 |
| (s:kwn) |  |  |  |  |  | . 02693 |  |  |  |  |  |  |  | . 02693 |  |  |
| DISCOUNT (S'duveling unitday) | (02300) |  |  |  |  |  | (.02300) | (709 | (.02300) |  |  |  |  |  | (.02300) | 780 |
| MARL [CARE \& Medical Baseline Unitis](Skwn) |  | * |  |  |  | . 00987 | 04892 |  |  | * |  |  |  | . 00987 | 04892 |  |



| EL-6 |  | PRESENT (10/01/2013) RATES |  |  |  |  |  |  | PROPOSED SUMMER 2014 RATES |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Distr | Gen | PPP | AB32 Creait | CIA | Oflher | Total |  | Distr | Gen | PPP | AB32 Credit | Cla | Oller | Total |  |
| Energy charge (skuh) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Peak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Baseline Usage | . 10430 | . 20720 | . 00607 | . 00000 | (.14337) | . 02235 | . 19655 |  | . 11040 | . 24143 | . 00647 | . 00000 | (.16854) | . 02204 | 21180 |  |
|  | 101\% - $130 \%$ of Baseline | 10430 | 20720 | . 00607 | .00000 | (.12984) | . 02235 | . 21008 |  | . 11040 | . 24143 | . 00647 | .00000 | (.10632) | . 02204 | 27402 |  |
|  | 131\%-200\% of Baseline | 10430 | 20720 | . 00607 | . 00000 | (.03009) | . 02235 | . 30983 |  | 11040 | 24143 | . 00647 | . 00000 | (.10632) | . 02204 | 27402 |  |
|  | 201\%-300\% of Baseline | 10430 | 20720 | . 00607 | .00000 | (.03009) | . 02235 | . 30983 |  | 11040 | 24143 | . 00647 | . 00000 | (.04325) | . 02204 | 34009 |  |
|  | over 300\% of Baseline | 10430 | . 20720 | . 00607 | . 00000 | (.03009) | . 02235 | . 30983 |  | . 11040 | . 24143 | . 00647 | . 00000 | (.04025) | . 02204 | 34009 |  |
| Part-Peak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Baseline Usage | (.00181) | . 09992 | . 00607 | . 00000 | (.01202) | . 02235 | . 11451 |  | . 01034 | . 11690 | . 00647 | . 00000 | (.02844) | . 02204 | . 12730 |  |
|  | 101\%-130\% of Baseline | (.00181) | . 09992 | . 00607 | .00000 | . 00151 | . 02235 | . 12804 |  | 01034 | . 11690 | . 00647 | .00000 | . 01078 | . 02204 | . 16652 |  |
|  | $131 \%$ - $200 \%$ of Baseline | (.00181) | . 09992 | . 00607 | .00000 | . 06024 | . 02235 | . 18677 |  | . 01034 | . 11690 | . 00647 | .00000 | . 01078 | . 02204 | . 16652 |  |
|  | 201\%, 300\% of Baseline | (.00181) | . 09992 | . 00607 | .00000 | . 06024 | . 02235 | . 18677 |  | 01034 | . 11690 | . 00647 | .00000 | . 06129 | 02204 | 21703 |  |
|  | Over 300\% of Baseline | (.00181) | . 09992 | . 00607 | . 00000 | . 06024 | . 02235 | . 18677 |  | . 01034 | . 11690 | . 00647 | . 00000 | . 06129 | . 02204 | 21703 |  |
| опt-Peak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Baseline Usage | (.03718) | . 05652 | . 00607 | . 00000 | . 01211 | . 02235 | . 05987 |  | (.02302) | . 06631 | . 00647 | .00000 | (.00078) | . 02204 | 07102 |  |
|  | 101\%-130\% of Baseline | (.03718) | . 05652 | . 06607 | .00000 | . 02564 | . 02235 | . 07340 |  | (.02302) | . 06531 | . 00647 | . 00000 | . 02313 | . 02204 | 09492 |  |
|  | 131\% - $200 \%$ of Baseline | (03718) | . 06652 | . 00607 | . 00000 | . 05705 | . 02235 | 10481 |  | (.02302) | . 06631 | . 00647 | .00000 | . 02313 | . 02204 | 09492 |  |
|  | 201\%-300\% of Baseline | (.03718) | . 05652 | . 00607 | . 00000 | . 05705 | . 02235 | . 10481 |  | (.02302) | . 06631 | . 00647 | . 00000 | . 06327 | . 02204 | 13507 |  |
|  | Over 300\% of Baseline | (.03718) | . 05652 | . 06607 | . 00000 | . 05705 | . 02235 | . 10481 |  | (.02302) | . 06631 | . 06647 | . 00000 | . 06327 | . 02204 | . 13507 |  |
| Winter |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Patt-Peak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Baseline Usage | (.00458) | . 07385 | . 00607 | .00000 | (.02275) | . 02235 | . 07494 |  | 00772 | . 08664 | . 00647 | . 00000 | (.03632) | . 02204 | 08654 |  |
|  | 101\% - $130 \%$ of Baseline | (.00458) | . 07385 | . 06607 | 00000 | (.00924) | . 02235 | . 08845 |  | 00772 | . 08664 | . 00647 | . 00000 | (.00809) | . 02204 | 11478 |  |
|  | $131 \%$ - 200\% of Baseline | (.00458) | . 07385 | . 06607 | . 00000 | . 02972 | . 02235 | 12741 |  | . 00772 | . 08664 | . 00647 | . 00000 | (.00809) | . 02204 | . 11478 |  |
|  | 201\%-300\% of Baseline | (.00458) | . 07385 | . 00607 | . 00000 | . 02972 | . 02235 | . 12741 |  | . 00772 | . 08664 | . 00647 | . 00000 | . 03481 | . 02204 | . 15767 |  |
| Offerak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| D | Baseline Usage | (.02724) | . 06244 | . 00607 | .00000 | (.00067) | . 02235 | . 06295 |  | (.01364) | . 07325 | . 00647 | . 00000 | (.01392) | . 02204 | 07419 |  |
| 1 | 101\% - 130\% of Baseline | (.02724) | . 06244 | . 00607 | .00000 | . 01285 | . 02235 | . 07647 |  | (.01364) | . 07325 | . 00647 | . 00000 | . 01109 | . 02204 | . 09921 |  |
| $\stackrel{\rightharpoonup}{\square}$ | 131\%-200\% of Baseline | (.02724) | . 06244 | . 06607 | . 00000 | . 04581 | . 02235 | . 10943 |  | (.01364) | . 07325 | . 00647 | . 00000 | . 01109 | . 02204 | . 09921 |  |
| 0 | 201\% - 300\% of Baseline | (.02724) | . 06244 | . 00607 | . 00000 | . 04581 | . 02235 | . 10943 |  | (.01364) | . 07325 | . 00647 | . 00000 | . 05158 | . 02204 | . 13969 |  |
|  | Over $300 \%$ of Baseline | (.02724) | . 06244 | . 00607 | . 00000 | . 04581 | . 02235 | . 10943 |  | (.01364) | . 07325 | . 00647 | . 00000 | . 05158 | . 02204 | . 13969 |  |
| minimum charge |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | (Simeterday) | 09626 | * | . 00335 |  |  | . 00028 | . 11828 | 369 | 08674 | * | . 00373 |  |  | . 00028 | 11828 | 360 |
|  | (\$*WHW) |  |  |  |  |  | . 02200 |  |  |  |  |  |  |  | . 02142 |  |  |
| Calculated residually as total less sum of non-gen charges. ${ }^{\text {a }}$ - Calculated residually as total less sum of non-gen charges. |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |



## PACIFIC GAS AND ELECTRIC COMPANY APPENDIX B

RATE C OMPARISON: ANTICIPA TED JANUARY 2014 (JANUARY 1, 2014) VERSUS PROP OSED SUMMER 2014 (MAY 1, 2014) RATES

$$
\begin{gathered}
\text { Pacific Gas and Electric Company } \\
\text { Summer 2014 Residential Electic Rate Refor }
\end{gathered}
$$

Rate Comparison: Anticipated January 2014 (January 1, 2014 ) Versus Proposed Summer 2014 (May 1, 2014) Rates


> Pacific Gas and Electric Company Summer 2014 Residential Electric Rate Reform Proposal

Rate Comparison: Anticipated January 2014 (January 1, 2014) Versus Proposed Summer 2014 (May 1, 2014) Rates


# Pacific Gas and Electric Company Summer 2014 Residential Electric Rate Refo 

Rate Comparison: Anticipated January 2014 Exhibit (PGGQE-1), Appendix B 1,2014 ) Versus Proposed Summer 2014 (May 1, 2014) Rates



> Pacific Gas and Electric Company Summer 2014 Residential Electic Rate Refor

Rate Comparison: Anticipated January 2014 Exhibit (PGGEE-1), Appendix B 1 , 2014) Versus Proposed Summer 2014 (May 1, 2014) Rates


> Pacific Gas and Electric Company Summer 2014 Residential Electic Rate Refor

Rate Comparison: Anticipated January 2014 Exhibit (PGGQE-1), Appendix B 1,2014 ) Versus Proposed Summer 2014 (May 1, 2014) Rates

$\begin{aligned} & \text { Pacific Gas and Electric Company } \\ & \text { Summer 2014 Residential Electric Rate Reto }\end{aligned}$
Exhibit (PG\&E-1) Appendix B

Rate Comparison: Anticipated January 2014 (January 1, 2014) Versus Proposed Summer 2014 (May 1, 2014) Rates


Rate Comparison: Anticipated January 2014 (January 1, 2014 ) Versus Proposed Summer 2014 (May 1, 2014) Rates


> Pacific Gas and Electric Company Surmer 2014 Residential Electic Rete Refor Exibibt (PGEE-1) Appendix

Rate Comparison: Anticipated January 2014 (January 1, 2014) Versus Proposed Summer 2014 (May 1, 2014) Rates


> Pacific Gas and Electric Company Summer 2014 Residential Eectric Rate Refor

Rate Comparison: Anticipated January 2014 (January 1, 2014) Versus Proposed Summer 2014 (May 1, 2014) Rates

|  | EL-6 | ANTIPATED JANUARY 2014 RATES |  |  |  |  |  |  |  | PROPOSED SUMMER 2014 RATES |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Distr | Gen | PPP | AB32 Credit | CIA | Other | Total |  | Distr | Gen | PPP | AB32 Creait | CIA | Other | Total |  |  |  |
|  | energy charge (SkMh) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Summer |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Peak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Baseline Usage | . 09241 | . 24122 | . 00647 | 00000 | (.15969) | . 02204 | . 20245 |  | . 11040 | . 24143 | . 00647 | . 00000 | (.16854) | . 02204 | 21180 |  | ok | true |
|  | 101\% - $130 \%$ of Baseline | . 09241 | . 24122 | . 00647 | 00000 | (.14576) | . 02204 | . 21638 |  | . 11040 | . 24143 | . 00647 | . 00000 | (.10632) | . 02204 | . 27402 |  | ok | false |
|  | 131\%-200\% of Baseline | . 09241 | . 24122 | . 00647 | 00000 | (.05231) | . 02204 | . 30983 |  | . 11040 | . 24143 | . 00647 | . 00000 | (.10632) | . 02204 | . 27402 |  | ok | false |
|  | 201\% - 30\% of Baseline | . 09241 | . 24122 | . 00647 | . 00000 | (.05231) | . 022204 | . 30983 |  | . 11040 | . 24143 | . 00647 | . 00000 | (.04025) | . 02204 | . 34009 |  | ok | true |
|  | Over $300 \%$ of Baseline | . 09241 | . 24122 | . 00647 | . 00000 | (.05231) | . 02204 | . 30983 |  | . 11040 | . 24143 | . 00647 | . 00000 | (.04025) | . 02204 | . 34009 |  | ok | true |
|  | Part-Peak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Baseline Usage | (00796) | . 11683 | . 00647 | 00000 | (.01943) | . 02204 | . 11795 |  | . 01034 | . 11690 | . 00647 | . 00000 | (.02844) | . 02204 | . 12730 |  | ok | true |
|  | 101\% - $130 \%$ of Baseline | (00796) | . 11683 | . 00647 | 00000 | (.00550) | . 02204 | . 13188 |  | . 01034 | . 11690 | . 00647 | . 00000 | . 01078 | . 02204 | . 16652 |  | ok | false |
|  | 131\% - $200 \%$ of Baseline | (00796) | . 11683 | . 00647 | 00000 | . 04939 | . 02204 | . 18677 |  | . 01034 | . 11690 | . 00647 | . 00000 | 01078 | . 02204 | . 16652 |  | ok | false |
|  | 201\%-30\% of Baseline | (00796) | . 11683 | . 00647 | 00000 | . 04939 | . 02204 | . 18677 |  | . 01034 | . 11690 | . 00647 | . 00000 | . 06129 | . 02204 | . 21703 |  | ok | true |
|  | Over 300\% of Baseline | (00796) | . 11683 | . 00647 | . 00000 | . 04939 | . 02204 | . 18677 |  | . 01034 | . 11690 | . 00647 | . 00000 | . 06129 | . 02204 | . 21703 |  | ok | true |
|  | Off-Pak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Baseline Usage | (04142) | . 06629 | . 00647 | . 00000 | . 00829 | . 02204 | . 06167 |  | (.02302) | . 06631 | . 00647 | . 00000 | (.00078) | . 02204 | . 07102 |  | ok | true |
|  | 101\% - $130 \%$ of Baseline | (.04142) | . 06629 | . 00647 | . 00000 | . 02222 | . 02204 | . 07560 |  | (.02302) | . 06631 | . 00647 | . 00000 | . 02313 | . 02204 | . 09492 |  | ok | False |
|  | 131\%-200\% of Baseline | (04142) | . 06629 | . 00647 | 00000 | . 05143 | . 02204 | . 10481 |  | (.02302) | . 06631 | . 00647 | . 00000 | . 02313 | . 02204 | . 09492 |  | ok | false |
|  | 201\%-300\% of Baseline | (04142) | . 06629 | . 00647 | . 00000 | . 05143 | . 02204 | . 10481 |  | (.02302) | . 06631 | . 00647 | . 00000 | . 06327 | . 02204 | . 13507 |  | ok | true |
|  | Over 300\% of Baseline | (.04142) | . 06629 | . 00647 | . 00000 | . 05143 | . 02204 | . 10481 |  | (.02302) | . 06631 | . 00647 | . 00000 | . 06327 | . 02204 | . 13507 |  | ok | true |
|  | Winter |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Pat-Peak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\stackrel{\underset{\sim}{\stackrel{1}{0}}}{ }$ | Baseline Usage | (01058) | . 08661 | . 00647 | 00000 | (.02735) | . 02204 | . 07719 |  | . 00772 | . 08664 | . 00647 | . 00000 | (03632) | . 02204 | . 08654 |  | ok | true |
|  | 101\% - $130 \%$ of Baseline | (01058) | . 08661 | . 00647 | 00000 | (.01344) | . 02204 | . 09110 |  | . 00772 | . 08664 | . 00647 | . 00000 | (.00809) | . 02204 | . 11478 |  | ok | FALSE |
|  | 131\%-200\% of Baseline | (.01058) | . 08661 | . 00647 | 00000 | . 02287 | . 02204 | . 12741 |  | . 00772 | . 08664 | . 00647 | . 00000 | (.00809) | . 02204 | . 11478 |  | ok | false |
|  | 201\% - $30 \%$ of Baseline | (01058) | . 08661 | . 00647 | . 00000 | . 02287 | . 02204 | . 12741 |  | . 00772 | . 08664 | . 00647 | . 00000 | . 03481 | . 02204 | . 15767 |  | ok | true |
|  | Over 300\% of Baseline | (01058) | . 08661 | . 00647 | . 00000 | . 02287 | . 02204 | . 12741 |  | . 00772 | . 08664 | . 00647 | . 00000 | . 03481 | . 02204 | . 15767 |  | ok | true |
|  | Off-Peak |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Baseline Usage | (03201) | . 07323 | . 00647 | . 00000 | (.00499) | . 02204 | . 06484 |  | (.01364) | . 07325 | . 00647 | . 00000 | (.01392) | . 02204 | . 07419 |  | ok | true |
|  | 101\% - $130 \%$ of Baseline | (03201) | . 07323 | . 00647 | . 00000 | . 00903 | . 02204 | . 07876 |  | (.01364) | . 07325 | . 00647 | . 00000 | . 01109 | . 02204 | . 09921 |  | ok | false |
|  | $131 \%$ - $200 \%$ of Baseline | (03201) | . 07323 | . 00647 | . 00000 | . 03970 | . 02204 | . 10943 |  | (.01364) | . 07325 | . 00647 | . 00000 | . 01109 | . 02204 | . 09921 |  | ok | FAlse |
|  | 201\%-30\% of Baseline | (03201) | . 07323 | . 00647 | . 00000 | . 03970 | . 02204 | . 10943 |  | (.01364) | . 07325 | . 00647 | . 00000 | . 05158 | . 02204 | . 13969 |  | ok | true |
|  | Over $300 \%$ of Baseline | (03201) | . 07323 | . 00647 | . 00000 | . 03970 | . 02204 | . 10943 |  | (.01364) | . 07325 | . 00647 | . 00000 | . 05158 | . 02204 | . 13969 |  | ok | true |
|  | minmum charge |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | (s/meterrday) | . 09429 | * | . 00372 |  |  | . 00028 | . 11828 | 360 | . 08674 | * | . 00373 |  |  | . 00028 | . 11828 | 360 | ok |  |
|  | (\$kNn) |  |  |  |  |  | . 02142 |  |  |  |  |  |  |  | . 02142 |  |  |  |  |
|  |  | * | alculated res | y as total lea | sum of non-gen | marges. |  |  |  | * | alculated res | y as total le | sum of non-gen | arges. |  |  |  |  |  |



| (.04992) | . 19532 | . 00763 | . 00000 | (.08624) | . 02204 | . 08883 |  | (.03262) | . 19548 | . 00763 | . 00000 | (.09435) | . 02204 | . 09818 |  | ok | true |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| (04992) | . 19532 | . 00763 | . 00000 | (.08624) | . 02204 | . 08883 |  | (.03262) | . 19548 | . 00763 | . 00000 | (.07720) | . 02204 | . 11533 |  | ok | true |
| (04992) | . 19532 | . 00763 | . 00000 | (.03071) | . 02204 | . 14436 |  | (.03262) | . 19548 | . 00763 | . 00000 | (07720) | . 02204 | . 11533 |  | ok | false |
| (04992) | . 19532 | . 00763 | . 00000 | (.03071) | . 02204 | . 14436 |  | (.03262) | . 19548 | . 00763 | . 00000 | (.01791) | . 02204 | . 17462 |  | ok | true |
| (04992) | . 19532 | . 00763 | . 00000 | (.03071) | . 02204 | . 14436 |  | (.03262) | . 19548 | . 00763 | . 00000 | (01791) | . 02204 | . 17462 |  | ok | true |
| (.06242) | . 12896 | . 00763 | . 00000 | (.04230) | . 02204 | . 05391 |  | (.04493) | . 12881 | . 00763 | . 00000 | (.05029) | . 02204 | . 06326 |  | ok | true |
| (06242) | . 12896 | . 00763 | . 00000 | (.04230) | . 02204 | . 05391 |  | (.04493) | . 12881 | . 00763 | . 00000 | (.03314) | . 02204 | . 08041 |  | ok | true |
| (.06242) | . 12896 | . 00763 | . 00000 | (.00270) | . 02204 | . 09351 |  | (.04493) | . 12881 | . 00763 | . 00000 | (.03314) | . 02204 | . 08041 |  | ok | false |
| (.06242) | . 12896 | . 00763 | . 00000 | (.00270) | . 02204 | . 09351 |  | (.04493) | . 12881 | . 00763 | . 00000 | . 01022 | . 02204 | . 12377 |  | ok | true |
| (06242) | . 12896 | . 00763 | . 00000 | (.00270) | . 02204 | . 09351 |  | (.04493) | . 12881 | . 00763 | . 00000 | . 01022 | . 02204 | . 12377 |  | ok | true |
| . 32927 |  |  |  |  |  | . 32927 | 10.02 | . 32927 |  |  |  |  |  | . 32927 | 1002 | ok |  |

## PACIFIC GAS AND ELECTRIC COMPANY APPENDIX C

ILLUSTRATIVE BILL IM PACTS: PRESENT (OCTOBER 1, 2013) VERSUS PROPOSED SUMME R 2014 (MAY 1, 2014) RATES
Data From Yearly File (JAN 2011 - Dec 2011)

| $\begin{gathered} \text { LAST } \\ \text { RATE } \\ \text { SChEDULE } \end{gathered}$ | COUNT | ANNUAL TOTAL KWH | TOTAL ANNUAL CURRENT BILLS | CURRENT <br> AVG RATE | total annual PROPOSED BILLS | PROPOSED avg rate | DIFFERENCE <br> (PROPOSEDCURRENT) | (PROPOSEDCURRENT)/ CURRENT | MAX DIFFERENCE | MIN DIFFERENCE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| E1 | 2,815,104 | 18,278,276,127 | \$3,623,302,134 | 0.19823 | \$3,701,089,549 | 0.20249 | \$77,787,415 | 2.15\% | \$812 | \$-19,656 |
| E1L | 1,156,472 | 7,576,011,970 | \$754,358,203 | 0.09957 | \$872,712,627 | 0.11519 | \$118,354,424 | 15.69\% | \$5,910 | \$-0 |
| E6 | 5,462 | 52,512,188 | \$12,037,655 | 0.22924 | \$11,919,985 | 0.22699 | \$-117,669 | ( 0.98\%) | \$407 | \$-5,356 |
| E6L | 379 | 6,078,576 | \$676,418 | 0.11128 | \$806,813 | 0.13273 | \$130,394 | 19.28\% | \$3,821 | \$10 |
| E7 | 57,771 | 606,295,672 | \$117,970,656 | 0.19458 | \$117,636,416 | 0.19402 | \$-334,240 | ( 0.28\%) | \$685 | \$-6,920 |
| E7L | 7,757 | 84,873,446 | \$8,747,018 | 0.10306 | \$10,210,260 | 0.12030 | \$1,463,242 | 16.73\% | \$5,321 | \$0 |
| E8 | 43,911 | 675,567,529 | \$150,914,820 | 0.22339 | \$147,859,755 | 0.21887 | \$-3,055,065 | ( 2.02\%) | \$781 | \$-10,051 |
| E8L | 8,692 | 136,763,391 | \$13,497,786 | 0.09869 | \$15,736,805 | 0.11507 | \$2,239,020 | 16.59\% | \$15,453 | \$0 |
| total | 4,095,548 | 27,416,378,899 | \$4,681,504,689 | 0.17076 | \$4,877,972,209 | 0.17792 | \$196,467,520 | 4.20\% | \$33,190 | \$-41,973 |

CORRELATION OF AVERAGE MONTHLY DOLLAR AND PERCENT DIFFERENCES
Comparison Between 10/1/2013 Current RES Rates
AND 2014 Proposed Summer RES Rates using 50\% BO
FOR ANNUAL
Data From Yearly File (JAN 2011 - Dec 2011
RES full service

| M | MONTHLY \$ | BELOW - $20 \%$ | -20--10\% | -10--5\% | -5 - -0.01\% | -0.01-0\% | 0-0.01\% | 0.01-5\% | 5-10\% | 10-20\% | Above 20\% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| PCT D | DIFFERENCE | DECREASE | DECREASE | decrease | decrease | DECREASE | increase | increase | increase | increase | Increase |
| 4\% | \$-7.3 | 1,058(0.0\%) | 3,804(0.28) | 3,050(0.18) | 104,889(3.7\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| $8 \%$ | \$-5.4 | 0 | 0 | 121 (0.08) | 112,372(4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 12\% | \$-4.4 | 0 | 0 | 10(0.0\%) | 113,088 (4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 16\% | \$-3.8 | 0 | 0 | 2 (0.0\%) | 114,112(4.18) | 0 | 0 | 0 | 0 | 0 | 0 |
| $20 \%$ | \$-3.2 | 0 | 0 | 0 | 110,531(3.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 248 | \$-1.9 | 0 | 0 | 4 (0.0\%) | 112,585(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| $28 \%$ | \$-0.4 | 0 | 0 | 0 | 112.871(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| 32\% | \$0.4 | 0 | 0 | 0 | 29,037(1.08) | 1,013(0.08) | 27,338(1.0\%) | 46,235(1.6\%) | 8,729(0.38) | 1(0.0\%) | 0 |
| $36 \%$ | \$1.3 | 0 | 0 | 0 | 0 | 0 | 0 | 59,116(2.18) | 9,770(0.38) | 44,765(1.6\%) | 0 |
| 40\% | \$1.9 | 0 | 0 | 0 | 0 | 0 | 0 | 45,942(1.6\%) | 1,334(0.08) | 65,273(2.3\%) | 0 |
| 44\% | \$2.5 | 0 | 0 | 0 | 0 | 0 | 0 | 39,973(1.48) | 2,461(0.18) | 70,363(2.58) | 0 |
| 48\% | \$3.0 | 0 | 0 | 0 | 0 | 0 | 0 | 35,471(1.38) | 4,505(0.2\%) | 72,830(2.6\%) | 3 (0.08) |
| 52\% | \$3.5 | 0 | 0 | 0 | 0 | 0 | 0 | 28,966(1.0\%) | 10,751(0.48) | 73,628(2.6\%) | 5 (0.0\%) |
| $56 \%$ | \$3.9 | 0 | 0 | 0 | 0 | 0 | 0 | 27,067(1.0\%) | 13,405(0.5\%) | 71,039(2.5\%) | 12 (0.08) |
| 60\% | \$4.4 | 0 | 0 | 0 | 0 | 0 | 0 | 23,510(0.88) | 19,055(0.78) | 70,415(2.5\%) | 17(0.08) |
| 64\% | \$4.9 | 0 | 0 | 0 | 0 | 0 | 0 | 16,854 (0.6\%) | 26,462(0.98) | 68,055 (2.4\%) | 19 (0.08) |
| 68\% | \$5.5 | 0 | 0 | 0 | 0 | 0 | 0 | 12,208(0.48) | 32,629(1.28) | 69,371(2.5\%) | 22 (0.08) |
| 72\% | \$6.0 | 0 | 0 | 0 | 0 | 0 | 0 | 6,804 (0.2\%) | 33,649(1.28) | 70,739 (2.5\%) | 26 (0.08) |
| $76 \%$ | \$6.6 | 0 | 0 | 0 | 0 | 0 | 0 | 4,091(0.18) | 36,556(1.38) | 73,081(2.6\%) | 15 (0.08) |
| 80\% | \$7.1 | 0 | 0 | 0 | 0 | 0 | 0 | 2,655(0.17) | 33,826(1.28) | 74,864(2.78) | 21 (0.08) |
| 84\% | \$7.8 | 0 | 0 | 0 | 0 | 0 | 0 | 2,388(0.17) | 26,036(0.98) | 85,059(3.08) | 26 (0.0\%) |
| 88\% | \$8.5 | 0 | 0 | 0 | 0 | 0 | 0 | 2,284(0.1\%) | 17,764(0.6\%) | 91,447(3.28) | 587(0.08) |
| 92\% | \$9.5 | 0 | 0 | 0 | 0 | 0 | 0 | 2,015(0.1\%) | 10,261 (0.4\%) | 99,653(3.5\%) | 78 (0.08) |
| 96\% | \$10.8 | 0 | 0 | 0 | 0 | 0 | 0 | 1,729(0.1\%) | 8,542(0.38) | 101, 744 (3.6\%) | 783 (0.0\%) |
| 100\% | \$67.6 | 0 | 0 | 0 | 0 | 0 | 0 | 1,079(0.0\%) | 16,944(0.6\%) | 88,111(3.18) | 6,101(0.2\%) |
| total |  | 1,058 | 3,804 | 3,187 | 809,485 | 1,013 | 27,338 | 358,387 | 312,679 | 1290438 | 7,715 |
|  |  | 0.0\% | 0.2\% | $0.1 \%$ | 28.8\% | 0.08 | 1.0\% | 12.7\% | 11.1\% | 45.8\% | 0.3\% |
| cumulative |  | 1,058 | 4,862 | 8,049 | 817.534 | 818,547 | 845,885 | 1204272 | 1516951 | 2807389 | 2815104 |
|  |  | 0.0\% | 0.2\% | 0.3\% | 29.08 | 29.1\% | 30.0\% | 42.8\% | 53.9\% | 99.7\% | 100.0\% |
|  |  |  |  |  |  |  |  |  |  |  |  |

Comparison Between 10/1/2013 Current RES Rates
AND 2014 Proposed Summer RES Rates using 50\% BQ

## FOR ANNUAL

Data From Yearly File (JAN 2011 - Dec 2011)
RES full service


Comparison Between 10/1/2013 Current RES Rates
AND 2014 proposed Summer Res Rates using 50\% BQ FOR ANNUAL
Data From Yearly File (Jan 2011 - Dec 2011)
RES full service

| \$ M | MONTHLY \$ | BELOW -20\% | -20--10\% | -10--5\% | -5--0.01\% | -0.01-0\% | 0-0.01\% | 0.01-5\% | 5-10\% | 10-20\% | ABOVE 20\% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| PCT D | difference | Decrease | decrease | decrease | decrease | DECREASE | INCREASE | increase | increase | Increase | Increase |
| 4\% | \$-18.9 | $9(0.28)$ | 16(0.38) | 8 (0.1\%) | 185 (3.4\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| $8 \%$ | \$-11.4 | 0 | 0 | 8 (0.1\%) | 211 (3.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 12\% | \$ \$-8.8 | 0 | 0 | $2(0.08)$ | 218 (4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| 16\% | \$-6.9 | 0 | 0 | 1 (0.08) | 217(4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 208 | \% \$-5.6 | 0 | 0 | $2(0.08)$ | 216 (4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| 24\% | \$-4.5 | 0 | 0 | 1 (0.0\%) | 218 (4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| 28\% | \$ \$-3.5 | 0 | 0 | 0 | 219 (4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 32\% | \$-2.6 | 0 | 0 | 0 | 218 (4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| $36 \%$ | \$ \$-1.7 | 0 | 0 | 0 | 218 (4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 40\% | \$ \$-1.0 | 0 | 0 | 0 | 218 (4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 448 | \$ \$-0.3 | 0 | 0 | 0 | 220 (4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 48\% | \% $\$ 0.3$ | 0 | 0 | 0 | 89 (1.6\%) | 2 (0.08) | 20(0.48) | 106(1.9\%) | 0 | 0 | 0 |
| 52\% | \% $\$ 0.9$ | 0 | 0 | 0 | 0 | 0 | 0 | 216 (4.0\%) | 2 (0.08) | 3 (0.1\%) | 0 |
| 56\% | \% \$1.5 | 0 | 0 | 0 | 0 | 0 | 0 | 193 (3.5\%) | 18 (0.38) | 5 (0.18) | 0 |
| 60\% | \% \$2.0 | 0 | 0 | 0 | 0 | 0 | 0 | 181(3.38) | 35 (0.6\%) | 3 (0.1\%) | 0 |
| 64\% | \% \$2.5 | 0 | 0 | 0 | 0 | 0 | 0 | 150 (2.7\%) | 46 (0.88) | 24 (0.4\%) | 0 |
| 68\% | - $\$ 3.0$ | 0 | 0 | 0 | 0 | 0 | 0 | $95(1.7 \%)$ | 70 (1.38) | 54 (1.08) | 0 |
| 72\% | - \$3.5 | 0 | 0 | 0 | 0 | 0 | 0 | 78 (1.48) | 80 (1.5\%) | 60 (1.18) | 0 |
| $76 \%$ | \% $\quad \$ 4.0$ | 0 | 0 | 0 | 0 | 0 | 0 | 60 (1.18) | 74 (1.48) | 85 (1.6\%) | 0 |
| 80\% | \% $\quad \$ 4.5$ | 0 | 0 | 0 | 0 | 0 | 0 | 41 (0.8\%) | 84 (1.5\%) | $92(1.78)$ | 0 |
| 84\% | \% $\quad$ 5.2 | 0 | 0 | 0 | 0 | 0 | 0 | 22(0.4\%) | 99 (1.8\%) | 99 (1.88) | 0 |
| $88 \%$ | - $\$ 6.0$ | 0 | 0 | 0 | 0 | 0 | 0 | 29 (0.5\%) | 75 (1.48) | 113 (2.18) | 0 |
| 92\% | - $\$ 7.1$ | 0 | 0 | 0 | 0 | 0 | 0 | 20(0.4\%) | 75(1.48) | 123 (2.38) | 0 |
| 96\% | - \$9.1 | 0 | 0 | 0 | 0 | 0 | 0 | 15(0.38) | 49 (0.98) | 152 (2.8\%) | 2 (0.08) |
| 100\% | \% $\$ 33.9$ | 0 | 0 | 0 | 0 | 0 | 0 | 8 (0.17) | 40(0.77) | 165(3.0\%) | 5 (0.1\%) |
| total |  | 9 | 16 | 22 | 2,447 | 2 | 20 | 1,214 | 747 | 978 | 7 |
|  |  | 0.2\% | 0.3\% | 0.4\% | 44.8\% | $0.0 \%$ | $0.4 \%$ | 22.2\% | 13.7\% | 17.9\% | 0.1\% |
| cumulative |  | 9 | 25 | 47 | 2,494 | 2,496 | 2,516 | 3,730 | 4,477 | 5,455 | 5,462 |
|  |  | 0.2\% | 0.5\% | 0.9\% | 45.7\% | 45.7\% | 46.1\% | 68.3\% | 82.0\% | 99.9\% | 100.0\% |
| AVG.MO | MO DIFF. | \$-189.3 | \$-50.5 | \$-17.1 | \$-8.1 | \$-0.0 | \$0.0 | \$2.2 | \$4.8 | \$6.4 | \$16.4 |


|  | $\begin{array}{cc} \$ & M \\ \text { PCT } & \mathrm{D} \end{array}$ | MONTHLY \$ DIFFERENCE | BELOW -20\% DECREASE | $-20--10 \%$ <br> DECREASE | $-10--5 \%$ <br> DECREASE | $-5--0.01 \%$ <br> DECREASE | $\begin{gathered} -0.01-0 \% \\ \text { DECREASE } \end{gathered}$ | $0-0.01 \%$ <br> INCREASE | $0.01-5 \%$ <br> INCREASE | $5-10 \%$ <br> INCREASE | $10-20 \%$ <br> INCREASE | ABOVE 20\% INCREASE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 4\% | \$2.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5 (1.3\%) | 10 (2.6\%) | 0 |
|  | 8\% | \$2.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.08) | 0 |
|  | 12\% | \$4.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.0\%) | 0 |
|  | 16\% | \$5.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.3\%) | 14 (3.78) | 0 |
|  | $20 \%$ | \$5.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 17(4.5\%) | 0 |
|  | 24\% | \$6.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 14 (3.78) | 0 |
|  | 28\% | \$6.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 14 (3.78) | 1(0.3\%) |
|  | 32\% | \$7.8 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.08) | 0 |
|  | 36\% | \$8.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 16 (4.28) | 0 |
|  | 40\% | \$9.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.08) | 0 |
|  | $44 \%$ | \$10.7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.08) | 0 |
|  | 48\% | \$11.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.0\%) | 1(0.3\%) |
|  | 52\% | \$12.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.08) | 0 |
|  | 56\% | \$13.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 (3.4\%) | 1 (0.38) |
|  | 60\% | \$15.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 16 (4.2\%) | 0 |
|  | 64\% | \$18.1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.0\%) | 0 |
| $?$ | 68\% | \$20.2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.3\%) | 13 (3.4\%) | 1(0.38) |
| 0 | 72\% | \$23.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.0\%) | 0 |
|  | 76\% | \$31.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.0\%) | 0 |
|  | 80\% | \$39.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1(0.3\%) | 10(2.6\%) | 5(1.3\%) |
|  | 84\% | \$50.1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 9 (2.4\%) | 6(1.6\%) |
|  | 88\% | \$78.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5(1.38) | 10(2.6\%) |
|  | 92\% | \$96.5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1(0.38) | 14 (3.7\%) |
|  | 96\% | \$146.2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1(0.3\%) | 14 (3.7\%) |
|  | 100\% | \$318.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (4.08) |
|  | TOTAL |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8 | 303 | 68 |
|  |  |  | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.08 | 2.1\% | 79.9\% | 17.9\% |
|  | cumulative |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8 | 311 | 379 |
|  |  |  | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 2.18 | 82.1\% | 100.0\% |
|  | AVG.MO DIFF. |  | . | . | - | - | . |  | - | \$8.5 | \$13.8 | \$99.8 |

Data From Yearly File (JAN 2011 - Dec 2011)
RES full service
LAST RATE SCHEDULE=E7

|  | $\begin{gathered} \$ \\ \mathrm{PCT} \end{gathered}$ | MONTHLY \$ <br> DIfFERENCE | BELOW -20\% DECREASE | $-20--10 \%$ DECREASE | $-10--5 \%$ <br> DECREASE | $-5 \cdots-0.01 \%$ <br> DECREASE | $-0.01-0 \%$ <br> DECREASE | $\begin{gathered} 0-0.01 \% \\ \text { INCREASE } \end{gathered}$ | $0.01-5 \%$ INCREASE | $5-10 \%$ <br> INCREASE | $10-20 \%$ <br> INCREASE | ABOVE 20\% increase |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 4\% | \$-14.1 | 156(0.3\%) | 370(0.6\%) | 167(0.38) | 1,619(2.8\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 8\% | \$-10.1 | 0 | 10(0.0\%) | 73 (0.1\%) | 2,238(3.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 12\% | \$-8.2 | 0 | 0 | 18 (0.0\%) | 2,296(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 16\% | \$-7.1 | 0 | 1 (0.08) | 11 (0.08) | 2,294(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 20\% | \$-6.3 | 0 | 0 | 6 (0.0\%) | 2,303(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 24\% | \$-5.5 | 0 | 0 | $4(0.0 \%)$ | 2,322(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 28\% | \$-4.9 | 0 | 0 | 7 (0.0\%) | 2,281(3.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 32\% | \$-4.5 | 0 | 0 | $6(0.08)$ | 2,333(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 36\% | \$-4.0 | 0 | 0 | 11 (0.08) | 2,307(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 40\% | \$-3.3 | 0 | 0 | 11 (0.0\%) | 2,272(3.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 44\% | \$-2.2 | 0 | 0 | 1 (0.0\%) | 2,311(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 48\% | \$-1.1 | 0 | 0 | 0 | 2,318(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 52\% | \$0.0 | 0 | 0 | 0 | 2,170(3.8\%) | 37(0.1\%) | 78 (0.18) | 12 (0.0\%) | 0 | 0 | 0 |
|  | 56\% | \$1.1 | 0 | 0 | 0 | 0 | 0 | 11 (0.08) | 2,210(3.8\%) | 76(0.1\%) | 32 (0.18) | 0 |
|  | 60\% | \$2.0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,786(3.1\%) | 108 (0.2\%) | 401 (0.78) | 0 |
|  | 64\% | \$3.0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,420(2.5\%) | 238 (0.4\%) | 670 (1.28) | 3 (0.0\%) |
| $?$ | 68\% | \$4.0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,128(2.08) | 358 (0.6\%) | 786 (1.4\%) | 30 (0.1\%) |
| $\sigma$ | 72\% | \$5.0 | 0 | 0 | 0 | 0 | 0 | 0 | 704 (1.2\%) | 641 (1.1\%) | 880 (1.5\%) | 71 (0.1\%) |
|  | 76\% | \$6.1 | 0 | 0 | 0 | 0 | 0 | 0 | 464 (0.8\%) | 839 (1.5\%) | 921 (1.6\%) | 101 (0.2\%) |
|  | 80\% | \$7.1 | 0 | 0 | 0 | 0 | 0 | 0 | 306 (0.5\%) | 742 (1.3\%) | 1,097(1.9\%) | 158 (0.3\%) |
|  | 84\% | \$8.3 | 0 | 0 | 0 | 0 | 0 | 0 | 241(0.4\%) | 630(1.1\%) | 1,228(2.18) | 210 (0.4\%) |
|  | 88\% | \$9.5 | 0 | 0 | 0 | 0 | 0 | 0 | 156 (0.3\%) | 598 (1.0\%) | 1,286(2.28) | 280(0.5\%) |
|  | 92\% | \$11.1 | 0 | 0 | 0 | 0 | 0 | 0 | 83 (0.1\%) | 751 (1.3\%) | 1,085(1.98) | 386 (0.7\%) |
|  | 96\% | \$14.2 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (0.0\%) | 731 (1.3\%) | 1,302(2.38) | 255 (0.4\%) |
|  | 100\% | \$57.1 | 0 | 0 | 0 | 0 | 0 | 0 | 10(0.08) | 149 (0.3\%) | 1,572(2.7\%) | 579 (1.08) |
|  | total |  | 156 | 381 | 315 | 29,064 | 37 | 89 | 8,535 | 5,861 | 11,260 | 2,073 |
|  |  |  | 0.37 | $0.7 \%$ | $0.5 \%$ | 50.3\% | $0.1 \%$ | 0.2\% | 14.8\% | 10.1\% | 19.5\% | 3.6\% |
|  | cumulative |  | 156 | 537 | 852 | 29,916 | 29,953 | 30,042 | 38,577 | 44,438 | 55,698 | 57,771 |
|  |  |  | 0.3\% | 0.9\% | 1.5\% | 51.8\% | 51.8\% | 52.0\% | 66.8\% | 76.9\% | 96.4\% | 100.0\% |
|  |  | AVG.MO DIFF. | \$-121.6 | \$-45.4 | \$-15.6 | \$-6.2 | \$-0.0 | \$0.0 | \$2.8 | \$7.6 | \$8.8 | \$12.5 |

Comparison Between 10/1/2013 Current RES Rates
AND 2014 Proposed Summer RES Rates using $50 \%$ B
FOR ANNUAL
Data From Yearly File (JAN 2011 - Dec 2011)
RES full service


Comparison Between 10/1/2013 Current RES Rates
AND 2014 Proposed Summer RES Rates using $50 \% \mathrm{BQ}$ FOR ANNUAL
Data From Yearly File (JAN 2011 - Dec 2011)
RES full service

|  | \$ M | MONTHLY \$ | BELOW - $20 \%$ | -20--10\% | -10--5\% | -5--0.01\% | -0.01-0\% | 0-0.01\% | 0.01-5\% | 5-10\% | 10-20\% | ABOVE 20\% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | PCT D | difference | DECREASE | decrease | DECREASE | DECREASE | DECREASE | InCREASE | INCREASE | INCREASE | increase | InCREASE |
|  | 4\% | \$-28.2 | 220(0.5\%) | 402 (0.9\%) | 34 (0.18) | 1,100(2.58) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 8\% | \$-19.8 | 0 | 34 (0.1\%) | 184(0.4\%) | 1,539(3.5\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 12\% | \$-15.8 | 0 | 1 (0.0\%) | 117(0.38) | 1,645(3.78) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 16\% | \$-13.4 | 0 | 0 | 57(0.1\%) | 1,707(3.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 208 | \$-11.7 | 0 | 1 (0.0\%) | 40(0.17) | 1,703(3.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 24\% | \$-10.4 | 0 | 0 | 20 (0.0\%) | 1,755(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 28\% | \$-9.4 | 0 | 0 | 11(0.0\%) | 1,725(3.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 32\% | \$-8.5 | 0 | 0 | 5(0.08) | 1,770(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 36\% | \$-7.7 | 0 | 0 | 5 (0.08) | 1,735(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 40\% | \$-7.0 | 0 | 0 | 5 (0.08) | 1,768(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 448 | \$-6.3 | 0 | 0 | 0 | 1,740(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | $48 \%$ | \$-5.7 | 0 | 0 | 10(0.08) | 1,761(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 52\% | \$-5.1 | 0 | 0 | $2(0.08)$ | 1,746(4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 56\% | \$-4.2 | 0 | 0 | 4(0.08) | 1,759(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 60\% | \$-3.0 | 0 | 0 | 0 | 1,743(4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 64\% | \$-1.7 | 0 | 0 | 0 | 1,760(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| O | 68\% | \$-0.1 | 0 | 0 | 0 | 1,754(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 72\% | \$1.5 | 0 | 0 | 0 | 170(0.4\%) | 14 (0.08) | 58 (0.17) | 1,472(3.4\%) | 43 (0.28) | 0 | 0 |
|  | 76\% | \$3.3 | 0 | 0 | 0 | 0 | 0 | 0 | 1,520(3.58) | 237(0.58) | 5 (0.08) | 0 |
|  | 80\% | \$5.0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,214(2.88) | 320 (0.7\%) | 221 (0.5\%) | 0 |
|  | 84\% | \$6.6 | 0 | 0 | 0 | 0 | 0 | 0 | 862 (2.08) | 610 (1.48) | 289 (0.78) | 0 |
|  | 88\% | \$8.0 | 0 | 0 | 0 | 0 | 0 | 0 | 739 (1.78) | 591 (1.38) | 419 (1.08) | 0 |
|  | 92\% | \$9.7 | 0 | 0 | 0 | 0 | 0 | 0 | 390(0.98) | 810 (2.88) | 558 (1.38) | 0 |
|  | 96\% | \$12.5 | 0 | 0 | 0 | 0 | 0 | 0 | 89 (0.28) | 1,009 (2.38) | 657(1.58) | 0 |
|  | 100\% | \$65.0 | 0 | 0 | 0 | 0 | 0 | 0 | 10(0.08) | 325 (0.7\%) | 1,405(3.2\%) | 12 (0.08) |
|  | total |  | 220 | 438 | 494 | 28,880 | 14 | 58 | 6,296 | 3,945 | 3,554 | 12 |
|  |  |  | 0.5\% | 1.0\% | 1.18 | $65.8 \%$ | 0.0\% | 0.18 | 14.38 | $9.0 \%$ | $8.1 \%$ | $0.0 \%$ |
|  | cumulative |  | 220 | 658 | 1,152 | 30,032 | 30,046 | 30,104 | 36,400 | 40,345 | 43,899 | 43,911 |
|  |  |  | 0.5\% | 1.5\% | 2.6\% | 68.48 | 68.4\% | 68.6\% | $82.9 \%$ | 91.9\% | 100.0\% | 100.0\% |
|  | AVG.MO | O DIFF. | \$-141.1 | \$-51.3 | \$-19.4 | \$-10.2 | \$-0.0 | \$0.0 | \$3.9 | \$8.4 | \$11.9 | \$25.6 |

Comparison Between 10/1/2013 Current RES Rates
AND 2014 Proposed Summer RES Rates using $50 \%$ BQ

## FOR ANNUAL

Data From Yearly File (JAN 2011 - Dec 2011)
RES full service

|  | $\underset{\text { PCT }}{\$}$ | MONTHLY \$ DIFPERENCE | BELOW -20\% DECREASE | $-20--10 \%$ <br> DECREASE | $-10--5 \%$ <br> DECREASE | $-5--0.01 \%$ <br> DECREASE | $\begin{gathered} -0.01-0 \% \\ \text { DECREASE } \end{gathered}$ | $\begin{gathered} 0-0.01 \% \\ \text { INCREASE } \end{gathered}$ | $\begin{gathered} 0.01-5 \% \\ \text { INCREASE } \end{gathered}$ | $5-10 \%$ <br> INCREASE | $10-208$ <br> INCREASE | ABOVE 20\% INCREASE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 4\% | \% $\$ 5.2$ | 0 | 0 | 0 | 0 | 0 | 4 (0.0\%) | 6(0.18) | 100(1.2\%) | 237(2.7\%) | 0 |
|  | 8\% | \% $\$ 6.5$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 39 (0.48) | 309 (3.6\%) | 0 |
|  | 12\% | \% $\$ 7.5$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 (0.1\%) | 346(4.0\%) | 0 |
|  | 16\% | \% $\$ 8.4$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 (0.0\%) | 343 (3.98) | 0 |
|  | 20\% | 8 \$9.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 (0.08) | 343 (3.9\%) | 0 |
|  | 24\% | \% \$10.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | $2(0.08)$ | 348 (4.08) | 0 |
|  | 28\% | \% \$11.2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 (0.18) | 339 (3.98) | 0 |
|  | 32\% | \% $\$ 12.0$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11(0.18) | 339 (3.98) | 0 |
|  | 36\% | \% \$12.8 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5 (0.28) | 340 (3.98) | 0 |
|  | 40\% | \% $\$ 13.6$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 (0.08) | 346 (4.0\%) | 0 |
|  | 44\% | \% \$14.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8 (0.1\%) | 340(3.98) | 0 |
|  | $48 \%$ | \% $\$ 15.1$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7(0.18) | 339 (3.9\%) | 3 (0.08) |
|  | 52\% | \% $\$ 16.0$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.08) | 342 (3.98) | 1 (0.08) |
|  | 56\% | \$ $\$ 17.0$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 (0.08) | 345 (4.08) | $2(0.08)$ |
|  | 60\% | \% \$18.2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 (0.1\%) | 337(3.98) | $2(0.08)$ |
|  | 64\% | \% \$19.5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.08) | 346 (4.08) | $2(0.08)$ |
| $\bigcirc$ | 68\% | \% $\$ 21.1$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 (0.08) | 342 (3.98) | $2(0.08)$ |
| 0 | 72\% | \% \$22.8 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.08) | 342 (3.9\%) | $3(0.08)$ |
|  | 76\% | - \$24.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.0\%) | 344 (4.08) | $3(0.08)$ |
|  | 80\% | \$ $\$ 27.8$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 336 (3.9\%) | 12 (0.18) |
|  | 84\% | \% $\$ 31.3$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 315 (3.6\%) | $32(0.4 \%)$ |
|  | 88\% | \% $\$ 3.0$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 291(3.3\%) | 57(0.7\%) |
|  | 92\% | \% \$42.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.08) | 247(2.8\%) | 99 (1.18) |
|  | 96\% | \% $\$ 56.4$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 186 (2.18) | 162 (1.98) |
|  | 100\% | \$1,287.7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 75 (0.98) | 272 (3.18) |
| total |  |  | 0 | 0 | 0 | 0 | 0 | 4 | 6 | 213 | 7,817 | 652 |
|  |  |  | 0.08 | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.1\% | 2.5\% | 89.9\% | 7.5\% |
| cumulative |  |  | 0 | 0 | 0 | 0 | 0 | 4 | 10 | 223 | 8,040 | 8,692 |
|  |  |  | $0.0 \%$ | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.1\% | 2.68 | 92.5\% | 100.0\% |
| AVG. MO DIFF. |  |  | - | - | - | - | - | \$0.0 | \$0.7 | \$7.1 | \$17.7 | \$72.8 |

## PACIFIC GAS AND ELECTRIC COMPANY APPENDIX D

ILLUSTRATIVE BIL L IMPACTS: ANTICIPA TED JANUARY 2014 (JANUARY 1, 2014) VERSUS PROP OSED S UMMER 2014 (MAY 1, 2014) RATES

CORRELATION OF AVERAGE MONTHLY DOLLAR AND PERCENT DIFFERENCES
Total Annual Bill Summary by Rate Schedules

| LAST <br> RATE SCHEDULE | COUNT | ANNUAL TOTAL KWH | TOTAL ANNUAL CURRENT BILLS | CURRENT <br> AVG rate | TOTAL ANNUAL PROPOSED BILLLS | PROPOSED <br> avg rate | DIPFBRENCE (PROPOSEDCURRENT) | (PROPOSEDCURRENT)/ CURRENT | MAX DIFFERENCE | MIN DIFFERENCE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| E1 | 2,815,104 | 18,278,276,127 | \$3,726,718,635 | 0.20389 | \$3,701,089,549 | 0.20249 | \$-25,629,087 | ( 0.698) | \$669 | \$-39,475 |
| E1L | 1,156,472 | 7,576,011,970 | \$768,502,719 | 0.10144 | \$872,712,627 | 0.11519 | \$104,209,908 | $13.56 \%$ | \$5,900 | \$-0 |
| E6 | 5,462 | 52,512,188 | \$12,320,772 | 0.23463 | \$11,919,985 | 0.22699 | \$-400, 786 | ( 3.258) | \$354 | \$-9,059 |
| E6L | 379 | 6,078,576 | \$681,679 | 0.11214 | \$806,813 | 0.13273 | \$125,134 | $18.36 \%$ | \$3,812 | \$8 |
| E7 | 57,771 | 606,295,672 | \$121,204,033 | 0.19991 | \$117,636,416 | 0.19402 | \$-3,567,617 | ( 2.948) | \$594 | \$-7,512 |
| E7L | 7,757 | 84,873,446 | \$8,887,092 | 0.10471 | \$10,210,260 | 0.12030 | \$1,323,168 | 14.89\% | \$5,312 | \$0 |
| E8 | 43.911 | 675,567,529 | \$154,848,553 | 0.22921 | \$147,859,755 | 0.21887 | \$-6,988,797 | ( 4.518) | \$642 | \$-10,788 |
| E8L | 8,692 | 136,763,391 | \$13,650,115 | 0.09981 | . \$15,736,805 | 0.11507 | \$2,086,690 | 15.29\% | \$15,445 | \$0 |
| TOTAL | 4,095,548 | 27,416,378,899 | \$4,806,813,597 | 0.17533 | \$4,877,972,209 | 0.17792 | \$71,158,612 | 1.48\% | \$32,728 | \$-66,826 |

CORRELATION OF AVERAGE MONTHLY DOLLAR AND PERCENT DIPFERENCES
Comparison Between 2014 proposed AET RES Rates using 55\% BQ
AND 2014 Proposed Summer Res Rates using 50\% BQ
FOR ANNUAL
Data From Yearly File (JAN 2011 - Dec 2011)
RES full service

|  | \$ M | MONTHLY \$ | BELOW -20\% | -20--10\% | -10--5\% | -5--0.01\% | -0.01-0\% | 0-0.01\% | 0.01-5\% | 5-10\% | 10-20\% | ABOVE $20 \%$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | PCT D | DIfFERENCE | DECREASE | DECREASE | DECREASE | DECREASE | DECREASE | increase | increase | Increase | increase | increase |
|  | 4\% | \$-16.1 | 1,640(0.1\%) | 4,518(0.2\%) | 23,536(0.8\%) | 82,999(2.9\%) | 0 | 0 | 0. | 0 | 0 | 0 |
|  | 8\% | \$-12.1 | 1 (0.0\%) | 145 (0.08) | 26,331(0.98) | 86,353(3.1\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 12\% | \$-9.9 | 0 | 34 (0.0\%) | 35,520(1.36) | 77,285(2.78) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 16\% | \$-8.4 | 0 | 4 (0.08) | 55,262(2.08) | 57, 252 (2.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 20\% | \$-7.3 | 0 | 1 (0.0\%) | 75,056(2.78) | 37,842(1.3\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 24\% | \$-6.0 | 0 | 2 (0.0\%) | 62,106(2.2\%) | 50,397(1.8\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 28\% | \$-4.2 | 0 | 0 | 27,062(1.08) | 85,120(3.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 32\% | \$-2.2 | 0 | 0 | 1,360(0.0\%) | 111,496(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 36\% | \$-0.3 | 0 | 0 | 34 (0.0\%) | 112,301(4.0\%) | 0 | 0 | 0 | 0 | 0 | 0 |
|  | 40\% | \$0.5 | 0 | 0 | 0 | 18,566(0.78) | 654 (0.0\%) | 27، 414 (1.0\%) | 52,591(1.9\%) | 13,826(0.5\%) | 161 (0.0\%) | 0 |
|  | 44\% | \$1.1 | 0 | 0 | 0 | 0 | 0 | 0 | 46,807(1.7\%) | 23.027(0.8\%) | 43,083(1.5\%) | 0 |
|  | 48\% | \$1.7 | 0 | 0 | 0 | 0 | 0 | 0 | 38,013(1.4\%) | 7,947(0.3\%) | 65,880(2.3\%) | 0 |
|  | 52\% | \$2.1 | 0 | 0 | 0 | 0 | 0 | 0 | 34,432(1.2\%) | 5,614(0.2\%) | 73,798(2.6\%) | 0 |
|  | 56\% | \$2.5 | 0 | 0 | 0 | 0 | 0 | 0 | 31,969 (1.18) | 5,755(0.2\%) | 74,622(2.7\%) | 0 |
|  | 60\% | \$2.9 | 0 | 0 | 0 | 0 | 0 | 0 | 30,565(1.1\%) | 8,662(0.3\%) | 73,623(2.6\%) | 0 |
|  | 64\% | \$3.3 | 0 | 0 | 0 | 0 | 0 | 0 | 27,231(1.08) | 14,179(0.5\%) | 71,407(2.5\%) | 0 |
| $\square$ | 68\% | \$3.8 | 0 | 0 | 0 | 0 | 0 | 0 | 25,829(0.9\%) | 18.014 (0.6\%) | 67,161(2.48) | 0 |
| N | 72\% | \$4.3 | 0 | 0 | 0 | 0 | 0 | 0 | 20,542(0.7\%) | 28,513(1.08) | 65,377(2.3\%) | 0 |
|  | 76\% | \$4.8 | 0 | 0 | 0 | 0 | 0 | 0 | 12,073(0.4\%) | 36,103(1.38) | 63,090(2.2\%) | 1 (0.0\%) |
|  | 80\% | \$5.3 | 0 | 0 | 0 | 0 | 0 | 0 | 6,493(0.2\%) | 38,053(1.4\%) | 68,502(2.4\%) | 5 (0.0\%) |
|  | 84\% | \$5.9 | 0 | 0 | 0 | 0 | 0 | 0 | 4,250(0.2\%) | 35,870(1.3\%) | 72,959(2.6\%) | 2 (0.0\%) |
|  | 88\% | \$6.6 | 0 | 0 | 0 | 0 | 0 | 0 | 3,319(0.17) | 32,616(1.2\%) | 76,315(2.7\%) | 2 (0.0\%) |
|  | 92\% | \$7.5 | 0 | 0 | 0 | 0 | 0 | 0 | 2,926(0.18) | 22,534 (0.8\%) | 86,619 (3.1\%) | 1 (0.0\%) |
|  | 96\% | \$8.6 | 0 | 0 | 0 | 0 | 0 | 0 | 2,211(0.18) | 10,547(0.4\%) | 99,596(3.5\%) | 1 (0.0\%) |
|  | 100\% | \$55.7 | 0 | 0 | 0 | 0 | 0 | 0 | 1,130(0.0\%) | 14,660(0.5\%) | 96,284(3.48) | 23 (0.0\%) |
| total |  |  | 1,641 | 4,704 | 306,267 | 719,611 | 654 | 27,414 | 340,381 | 315,920 | 1098477 | 35 |
|  |  |  | $0.1 \%$ | 0.2\% | 10.9\% | 25.6\% | $0.0 \%$ | 1.0\% | 12.1\% | 11.2\% | $39.0 \%$ | 0.0\% |
| cumulative |  |  | 1,641 | 6,345 | 312,612 | 1032223 | 1032877 | 1060291 | 1400672 | 1716592 | 2815069 | 2815104 |
|  |  |  | 0.17 | 0.2\% | 11.1\% | 36.7\% | 36.7\% | 37.7\% | 49.8\% | 61.0\% | 100.0\% | 100.0\% |
| AVG.MO DIFF. |  |  | \$-127.9 | \$-43.3 | \$-9.9 | \$-8.7 | \$-0.0 | \$0.0 | \$2.3 | \$4.7 | \$4.9 | \$19.0 |

## FOR ANNUAL

Data From Yearly File (JAN 2011 - Dec 2011
RES full service

|  | $\begin{array}{cc} \$ & M \\ \text { PCT } & \mathrm{D} \end{array}$ | MONTHLY \$ DIFFERENCE | BELOW -20\% DECREASE | $\begin{gathered} -20--10 \% \\ \text { DECREASE } \end{gathered}$ | $-10--5 \%$ <br> DECREASE | $-5--0.01 \%$ <br> DECREASE | $\begin{gathered} -0.01-0 \% \\ \text { DECREASE } \end{gathered}$ | $\begin{aligned} & 0-0.01 \% \\ & \text { INCREASE } \end{aligned}$ | $0.01-58$ <br> increase | 5-10\% INCREASE | $10-20 \%$ <br> INCREASE | ABOVE 20\% INCREASE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 48 | \$1.2 | 0 | 0 | 0 | 30(0.08) | 4 (0.08) | 1,765(0.28) | 1,544(0.17) | 4,429(0.48) | 38,912(3.4\%) | 0 |
|  | $8 \%$ | \$1.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 163 (0.08) | 46,468(4.0\%) | 0 |
|  | 12\% | \$2.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | $57(0.08)$ | 46,586(4.0\%) | 0 |
|  | 16\% | \$2.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 75 (0.08) | 45,957(4.0\%) | 0 |
|  | 20\% | \$2.7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 74 (0.08) | 45,448(3.9\%) | 0 |
|  | 24\% | \$3.2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 109 (0.0\%) | 46,379(4.08) | 0 |
|  | 28\% | \$3.6 | 0 | 0 | 0 | 0 | 0 | 0 | 2 (0.0\%) | 160(0.0\%) | 46,535 (4.08) | 1 (0.08) |
|  | 32\% | \$4.0 | 0 | 0 | 0 | 0 | 0 | 0 | 1(0.08) | 2,161(0.2\%) | 44,056(3.88) | 0 |
|  | 36\% | \$4.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3,590(0.37) | 43,208(3.7\%) | 0 |
|  | 408 | \$4.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2,550(0.2\%) | 43,074(3.7\%) | 0 |
|  | 44\% | \$5.0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.0\%) | 2,689(0.2\%) | 43,432(3.88) | 0 |
|  | 48\% | \$5.5 | 0 | 0 | 0 | 0 | 0 | 0 | 2 (0.0\%) | 2,149(0.2\%) | 44,172(3.8\%) | 1(0.08) |
|  | 52\% | \$5.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2,561(0.2\%) | 43,169 (3.78) | 0 |
|  | 56\% | \$6.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,967(0.2\%) | 45,390(3.98) | 0 |
|  | 60\% | \$6.6 | 0 | 0 | 0 | 0 | 0 | 0 | $2(0.0 \%)$ | 1,598(0.18) | 43,872 (3.88) | 1(0.08) |
|  | 64\% | \$7.1 | 0 | 0 | 0 | 0 | 0 | 0 | 2 (0.0\%) | 1,151(0.17) | 45,423(3.98) | 0 |
| $\square$ | 68\% | \$7.6 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.08) | 213 (0.08) | 45,864(4.08) | 0 |
| $\omega$ | 72\% | \$8.2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 228 (0.08) | 46,049(4.08) | 1(0.08) |
|  | 76\% | \$9.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 287(0.07) | 45,460(3.98) | 3 (0.08) |
|  | $80 \%$ | \$10.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 386 (0.08) | 46,141 (4.08) | 0 |
|  | 84\% | \$12.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 480 (0.07) | 45,493(3.98) | 7 (0.08) |
|  | 88\% | \$13.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 646 (0.18) | 45,545(3.98) | 9(0.08) |
|  | 92\% | \$15.7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 813 (0.17) | 45,383(3.9\%) | $35(0.08)$ |
|  | 967 | \$21.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 626 (0.18) | 45,521(3.98) | 129 (0.08) |
|  | 100\% | \$546.7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 172 (0.08) | 43,641(3.88) | 2,419(0.2\%) |
|  | total |  | 0 | 0 | 0 | 30 | 4 | 1,765 | 1,555 | 29,334 | 1121178 | 2,606 |
|  |  |  | 0.0\% | 0.08 | 0.0\% | 0.0\% | 0.0\% | 0.2\% | 0.1\% | 2.5\% | 96.9\% | 0.2\% |
|  | cumulative |  | 0 | 0 | 0 | 30 | 34 | 1,799 | 3,354 | 32,688 | 1153866 | 1156472 |
|  |  |  | 0.0\% | 0.0\% | 0.0\% | 0.08 | 0.0\% | 0.2\% | 0.3\% | $2.8 \%$ | 99.8\% | 100.0\% |
|  | AVG.MO | DIFF. | - | . | - | \$-0.0 | \$-0.0 | \$0.0 | \$0.1 | \$5.4 | \$7.5 | \$127.1 |

Data From Yearly file (JAN 2011 - Dec 2011)
RES full service


CORRELATION OF AVERAGE MONTHLY DOLLAR AND PERCENT DIFFERENCES
Comparison Between 2014 Proposed AET RES Rates using 55\% BQ
AND 2014 Proposed Summer RES Rates using 50\% BQ

## for annual

Data From Yearly file (JAN 2011 - Dec 2011)
RES full service


Data From Yearly File (JAN 2011 - Dec 2011)

| \$ | MONTHLY \$ | BELOW -20\% | -20--108 | -10--5\% | -5 - -0.01\% | -0.01-0\% | 0-0.01\% | 0.01-5\% | 5-10\% | 10-20\% | ABOVE 208 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| PCT | DIfFEREECE | decrease | DECREASE | DECREASE | DECREASE | DECREASE | increase | INCREASE | increase | Increase | INCREASE |
| 4\% | \$-26.1 | 233 (0.48) | 317(0.5\%) | 1,483(2.6\%) | 280(0.58) | 0 | 0 | 0 | 0 | 0 | 0 |
| 8\% | \$-19.5 | 1 (0.0\%) | 55 (0.1\%) | 1,915 (3.38) | 338 (0.68) | 0 | 0 | 0 | 0 | 0 | 0 |
| 12\% | \$-16.4 | 0 | 22 (0.08) | 1,869 (3.2\%) | 424 (0.78) | 0 | 0 | 0 | 0 | 0 | 0 |
| 16\% | \$-14.2 | 0 | 10(0.08) | 1,845(3.2\%) | 465 (0.88) | 0 | 0 | 0 | 0 | 0 | 0 |
| 20\% | \$-12.7 | 0 | $5(0.08)$ | 1,794(3.1\%) | 499 (0.9\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 24\% | \$-11.4 | 0 | 3 (0.08) | 1,783 (3.18) | 530 (0.98) | 0 | 0 | 0 | 0 | 0 | 0 |
| 28\% | \$-10.3 | 0 | $1(0.08)$ | 1,691(2.9\%) | 616 (1.18) | 0 | 0 | 0 | 0 | 0 | 0 |
| 32\% | \$-9.2 | 0 | 0 | 1,732(3.08) | 582 (1.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| 36\% | \$-8.3 | 0 | 2 (0.08) | 1,721(3.08) | 588 (1.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| 40\% | \$-7.5 | 0 | 0 | 1,696(2.9\%) | 609 (1.18) | 0 | 0 | 0 | 0 | 0 | 0 |
| 44\% | \$-6.5 | 0 | 0 | 1,367(2.4\%) | 950 (1.6\%) | 0 | 0 | 0 | 0 | 0 | 0 |
| 48\% | \$-5.2 | 0 | 0 | 911 (1.6\%) | 1,401(2.48) | 0 | 0 | 0 | 0 | 0 | 0 |
| 52\% | \$-3.8 | 0 | 0 | 405 (0.7\%) | 1,900(3.38) | 0 | 0 | 0 | 0 | 0 | 0 |
| 56\% | \$-2.3 | 0 | 0 | 102 (0.2\%) | 2,212(3.88) | 0 | 0 | 0 | 0 | 0 | 0 |
| 60\% | \$-0.6 | 0 | 0 | 1 (0.0\%) | 2,307(4.08) | 0 | 0 | 0 | 0 | 0 | 0 |
| 64\% | \$0.8 | 0 | 0 | 0 | 896 (1.6\%) | 17(0.08) | 76 (0.18) | 1,252(2.2\%) | 71(0.18) | 4 (0.0\%) | 0 |
| 68\% | \$2.0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,590(2.8\%) | $306(0.5 \%)$ | 427 (0.7\%) | 0 |
| 72\% | \$3.0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,174(2.08) | 271(0.5\%) | 859 (1.58) | 0 . |
| 76\% | \$4.0 | 0 | 0 | 0 | 0 | 0 | 0 | 927(1.6\%) | 450 (0.88) | 913 (1.68) | 10(0.08) |
| 80\% | \$5.0 | 0 | 0 | 0 | 0 | 0 | 0 | 660(1.18) | 726 (1.38) | 908 (1.68) | 26 (0.0\%) |
| 84\% | \$6.0 | 0 | 0 | 0 | 0 | 0 | 0 | 485(0.8\%) | 781 (1.48) | 1,016(1.8\%) | 33 (0.1\%) |
| 88\% | \$7.1 | 0 | 0 | 0 | 0 | 0 | 0 | 341 (0.6\%) | 625 (1.1\%) | 1,300(2.3\%) | 40(0.1\%) |
| 92\% | \$8.6 | 0 | 0 | 0 | 0 | 0 | 0 | 158 (0.38) | 534 (0.9\%) | 1,549 (2.78) | 60(0.1\%) |
| 96\% | \$11.2 | 0 | 0 | 0 | 0 | 0 | 0 | 40 (0.1\%) | 660 (1.18) | 1,516(2.6\%) | 97(0.2\%) |
| 100\% | \$49.4 | 0 | 0 | 0 | 0 | 0 | 0 | 17(0.0\%) | 247(0.4\%) | 1,833 (3.2\%) | 211(0.4\%) |
| тоtal |  | 234 | 415 | 20,315 | 14,597 | 17 | 76 | 6,644 | 4,671 | 10,325 | 477 |
|  |  | 0.4\% | 0.78 | 35.2\% | 25.38 | 0.08 | 0.1\% | 11.5\% | 8.18 | 17.98 | 0.8\% |
| cumulative |  | 234 | 649 | 20,964 | 35,561 | 35,578 | 35,654 | 42,298 | 46,969 | 57,294 | 57,771 |
|  |  | 0.4\% | 1.1\% | 36.38 | 61.6\% | 61.6\% | 61.78 | 73.2\% |  | 99.2\% | 100.0\% |
| AVg.mo | M DIFF. | \$-113.3 | \$-43.9 | \$-14.2 | \$-7.0 | \$-0.0 | \$0.0 | \$2.8 | \$6.2 | \$7.7 | \$13.6 |


|  | $\begin{gathered} \$ \\ \text { PCT } \end{gathered}$ | MONTHLY \$ <br> DIFFERENCE | BELOW -20\% DECREASE | $-20--10 \%$ <br> DECREASE | $-10--58$ <br> DECREASE | $-5--0.01 \%$ <br> DECREASE | $\begin{gathered} -0.01-0 \% \\ \text { DECREASE } \end{gathered}$ | $0-0.01 \%$ <br> INCREASE | $0.01-5 \%$ INCREASE | 5-10\% INCREASE | $10-20 \%$ <br> INCREASE | ABOVE 20\% INCREASE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 4\% | \$2.5 | 0 | 0 | 0 | 0 | 0 | 4 (0.18) | 7(0.18) | 33 (0.48) | 271(3.5\%) | 0 |
|  | 8\% | \$3.7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 16(0.2\%) | 289 (3.7\%) | 1 (0.08) |
|  | 12\% | \$4.5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | $28(0.48)$ | 279 (3.68) | 3 (0.08) |
|  | 16\% | \$5.2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 30 (0.48) | 278 (3.6\%) | 4 (0.1\%) |
|  | 20\% | \$5.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 23 (0.3\%) | 285 (3.7\%) | 1 (0.08) |
|  | 24\% | \$6.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 17(0.28) | 295 (3.88) | 3 (0.08) |
|  | 28\% | \$6.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 21(0.3\%) | 283 (3.6\%) | 2 (0.0\%) |
|  | 32\% | \$7.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 24 (0.38) | 286 (3.78) | $1(0.08)$ |
|  | 36\% | \$8.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 23 (0.38) | 290(3.7\%) | 1 (0.08) |
|  | 40\% | \$8.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 (0.28) | 291 (3.88) | $4(0.18)$ |
|  | 44\% | \$9.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | $21(0.38)$ | 286 (3.78) | 1 (0.0\%) |
|  | $48 \%$ | \$10.1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 16(0.28) | 288 (3.7\%) | 6 (0.1\%) |
|  | 52\% | \$10.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 (0.2\%) | 296 (3.8\%) | 1 (0.08) |
|  | 56\% | \$11.8 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 24 (0.3\%) | 281 (3.6\%) | 6 (0.1\%) |
|  | 60\% | \$12.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | $9(0.18)$ | 294 (3.8\%) | $4(0.18)$ |
|  | 64\% | \$13.5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 14(0.2\%) | 295 (3.8\%) | 8 (0.18) |
| $\bigcirc$ | 68\% | \$14.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 16(0.28) | 288 (3.7\%) | 3 (0.08) |
| $\checkmark$ | 72\% | \$15.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15(0.2\%) | 287(3.7\%) | 7 (0.18) |
|  | 76\% | \$16.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 12 (0.2\%) | 292 (3.88) | 5 (0.18) |
|  | $80 \%$ | \$18.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8 (0.1\%) | 297(3.8\%) | 7(0.18) |
|  | $84 \%$ | \$21.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 9 (0.1\%) | 295 (3.8\%) | 6 (0.18) |
|  | 88\% | \$24.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5 (0.18) | 291 (3.88) | 13 (0.2\%) |
|  | 92\% | \$29.1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 (0.08) | 284 (3.7\%) | 24 (0.38) |
|  | 96\% | \$40.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 281 (3.6\%) | 30 (0.48) |
|  | 100\% | \$442.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 (0.08) | 161 (2.18) | 147(1.98) |
|  | TOTAL |  | 0 | 0 | 0 | 0 | 0 | 4 | 7 | 395 | 7,063 | 288 |
|  |  |  | 0.0\% | 0.0\% | $0.0 \%$ | 0.0\% | 0.0\% | 0.18 | 0.1\% | 5.1\% | 91.1\% | 3.7\% |
|  | cumulative |  | 0 | 0 | 0 | 0 | 0 | 4 | 11 | 406 | 7,469 | 7,757 |
|  |  |  | 0.0\% | 0.0\% | $0.0 \%$ | 0.0\% | 0.0\% | 0.1\% | $0.1 \%$ | 5.2\% | 96.3\% | 100.0\% |
|  | MO D |  |  |  |  |  |  | \$0.0 | \$0.2 | \$8.7 | \$13.0 | \$55.3 |



LAST RATE SCHEDULE=EBL

|  | $\begin{gathered} \$ \\ \text { PCT } \end{gathered}$ | MONTHLY \$ DIFFERENCE | BELOW -20\% DECREASE | $-20--10 \%$ <br> DECREASE | $-10--5 \%$ <br> DECREASE | $-5--0.01 \%$ <br> DECREASE | $\begin{gathered} -0.01-0 \% \\ \text { DECREASE } \end{gathered}$ | $0-0.01 \%$ <br> INCREASE | $0.01-5 \%$ <br> INCREASE | $5-10 \%$ <br> INCREASE | $10-208$ <br> INCREASE | ABOVE 20\% <br> INCREASE |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 4\% | \% \$4.4 | 0 | 0 | 0 | 0 | 0 | 4 (0.0\%) | 10(0.1\%) | 221 (2.5\%) | 116(1.3\%) | 0 |
|  | 8\% | \% $\$ 5.5$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 109 (1.3\%) | 237(2.7\%) | 0 |
|  | 12\% | \% \$6.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 112 (1.3\%) | 239 (2.7\%) | 0 |
|  | 16\% | \% $\quad$ 7.2 | 0 | 0 | 0 | 0 | 0 | 0 | 1(0.0\%) | 101(1.28) | 243 (2.8\%) | 0 |
|  | 20\% | \% \$8.1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 71 (0.8\%) | 279 (3.28) | 0 |
|  | 24\% | \% \$8.9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 40 (0.5\%) | 311 (3.6\%) | 0 |
|  | $28 \%$ | \% $\quad \$ 9.7$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 29 (0.3\%) | 311 (3.6\%) | 0 |
|  | 32\% | \% \$10.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 31 (0.4\%) | 323 (3.7\%) | 0 |
|  | 36\% | \% $\$ 11.2$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 45 (0.5\%) | 300 (3.5\%) | 0 |
|  | 40\% | \% \$11.8 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 39 (0.4\%) | 307(3.5\%) | 0 |
|  | 44\% | \% \$12.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 31(0.48) | 317(3.6\%) | 0 |
|  | 48\% | \% \$13.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13(0.1\%) | 337 (3.9\%) | 0 |
|  | 52\% | \% \$14.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18 (0.2\%) | 329 (3.88) | 0 |
|  | 56\% | \% \$15.3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15(0.2\%) | 331 (3.8\%) | 0 |
|  | 60\% | \% \$16.5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 12(0.18) | 333 (3.8\%) | 1 (0.08) |
|  | 64\% | \% $\quad \$ 17.7$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10(0.1\%) | 337(3.98) | 1 (0.08) |
| $\square$ | 68\% | \% \$19.4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 (0.18) | 334 (3.8\%) | 1(0.0\%) |
| 6 | 72\% | \% \$21.1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 14 (0.2\%) | 331 (3.88) | 1 (0.0\%) |
|  | 76\% | \% $\$ 23.3$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 (0.0\%) | 344 (4.0\%) | 1 (0.0\%) |
|  | 80\% | \% $\$ 26.3$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5 (0.1\%) | 339 (3.98) | 3 (0.0\%) |
|  | 84\% | \% $\quad \$ 29.7$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 341 (3.98) | 7(0.18) |
|  | 88\% | \% $\$ 34.4$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 (0.08) | 319 (3.7\%) | 26 (0.3\%) |
|  | 92\% | \% $\$ 40.9$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1(0.0\%) | 283(3.3\%) | 63 (0.7\%) |
|  | 96\% | \% $\$ 54.9$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 218 (2.5\%) | 130 (1.5\%) |
|  | 100\% | \$1,287.0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 102(1.2\%) | 245 (2.8\%) |
|  | TOTAL |  | 0 | 0 | 0 | 0 | 0 | 4 | 11 | 937 | 7,261 | 479 |
|  |  |  | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | 0.0\% | $0.1 \%$ | 10.8\% | 83.5\% | 5.5\% |
|  | CUMUL | ative | 0 | 0 | 0 | 0 | 0 | 4 | 15 | 952 | 8,213 | 8,692 |
|  |  |  | 0.08 | 0.0\% | $0.0 \%$ | 0.0\% | 0.08 | 0.0\% | 0.28 | 11.0\% | 94.5\% | 100.0\% |
|  | AVG.MO | MO DIFF. | - | - | - | - | - | \$0.0 | \$1.1 | \$7.7 | \$17.6 | \$83.0 |

## PACIFIC GAS AND ELECTRIC COMPANY APPENDIX E STATEMENTS OF QUALIF ICATIONS

## PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF DENNIS M. KEANE

[^14]manager position in that department. From July 2008 through February 2009, I worked as a principal in the Market Design and Analysis Department, responsible for estimating avoided costs and evaluating demand response cost-effectiveness. In March 2009, I took the position of manager of electric rates in the Analysis and Rates Department. I was promoted to my current, senior manager position in April 2011.

I have previously appeared before the Commission, sponsoring testimony on electric rate design, revenue forecasting, flexible rate options, customer retention and economic development, the applicability of non-bypassable charges to direct access and departing load customers, and the cost-effectiveness of PG\&E's demand response programs.
Q 4 What is the purpose of your testimony?
A 4 I am sponsoring the following testimony and workpapers in PG\&E's Supplemental Filing for Summer 2014 Residential Electric Rate Reform Proposal:

- Chapter 1, "Summer 2014 Rate Reform Policy."
- Chapter 2, "Summer 2014 Residential Rate Design."
- Section A, "Introduction."
- Section B, "Standard Non-CARE Rates."
- Section F, "Rate Changes Between Cases."

Q 5 Does this conclude your statement of qualifications?
A 5 Yes, it does.

## PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF PHILIP J. QUADRINI

 2011 and 2014 GRC Phase II proceedings.

9 Q 5 Does this conclude your statement of qualifications?
Q 4 What is the purpose of your testimony?
A 4 I am sponsoring the following testimony and workpapers in PG\&E's Supplemental Filing for Summer 2014 Residential Electric Rate Reform Proposal:

- Chapter 2, "Summer 2014 Residential Rate Design."
- Section C, "Proposed CARE Rates."
- Section D, "Optional Schedules Rate Design."
- Section E, "Electric Baseline Quantities."

A 5 Yes, it does.


[^0]:    1 The Tier 1 rate would continue to apply to usage up to 100 percent of baseline, Tier 2 would apply to usage between 100 and 200 percent of baseline, and the new Tier 3 rate would apply to usage in excess of 200 percent of baseline.

[^1]:    8 Public Utilities Code (Pub. Util. Code) Section 739(d)(1) mandates that "In establishing these [baseline] rates, the commission shall avoid excessive rate increases for residential customers, and shall establish an appropriate gradual differentiation between the rates for the respective blocks of usage." In 2001, the Commission believed a top-to-bottom tier ratio of 1.15 was "an appropriate gradual differentiation." Clearly, today's steeply tiered rates are miles away from this mandate for gradual differentiation. Now that the Commission has the flexibility to do so, it should promptly begin narrowing the tier differentials so that, after an appropriate transition period, the "appropriate gradual differentiation" standard is once again met.

[^2]:    14 See Bonbright, Danielson, and Kanerschen, Principles of Public Utility Rates, specifically, Chapter 5, entitled "Cost of Service as a Basic Standard of Reasonableness."

[^3]:    15 PG\&E's 2014 AET filing was made on August 30, 2013. See Advice Letter 4278-E.

[^4]:    16 Changes in the revenue requirement can result in changes in the CARE discount percentage. For example, using rates designed under today's unreformed rate structure that collect the higher (compared to the 2013 AET amount) 2013 revenues associated with PG\&E's June 2013 Integrated Energy Policy Report forecast submitted to the California Energy Commission, the CARE discount would increase to 53 percent.

[^5]:    3 And further discussed in PG\&E's comments on parties' rate proposals filed July 12 and 26, 2013.
    4 This includes standard tiered rates schedules for individual and master-metered customers, as well as voluntary tiered rates (e.g., time-of-use (TOU)), and the CARE versions thereof.
    5 The new "Tier 3" rate would be equivalent to today's Tier 4 rate, and would apply to usage in excess of 200 percent of baseline. These new tier boundaries would also apply to CARE customers.

[^6]:    13 The fourth guideline in the October 25, 2013 ACR, which relates to CARE rates, is discussed in the CARE rate proposal in Section C of this chapter.

[^7]:    15 Appendix $C$ shows the bill comparisons between present (October 1, 2013) rates and proposed summer 2014 rates, while Appendix D shows the bill comparisons between anticipated January 1, 2014 rates and proposed summer 2014 rates.

[^8]:    17 PG\&E is proposing similar structural changes (e.g., combining (collapsing) Tiers 2 and 3 and narrowing of rate differentials between top and bottom tiers) for its voluntary rate schedules. These are described in Section D.

    18 Note that this is a different tier collapsing scheme than PG\&E had previously proposed in its 2014 GRC Phase II rate proposal (a proposal that is currently suspended per the recent October 18, 2013 emailed ruling of ALJ Long). In that proceeding, PG\&E had proposed collapsing the current Tiers 3 and 4 together into a single Tier 3 rate. Prior to the enactment of $A B 327$, that was the only type of tier collapse that was permissible, because SB 695's then-existing mandate required that Tiers 1 and 2 remain distinct and subject to limited, once-per-year, increases based upon the consumer price index. With the additional flexibility now available to the Commission due to the passage of AB 327, PG\&E here recommends that the Tier 2 and Tier 3 collapsing approach take effect in the summer of 2014 (as had previously been recommended by Office of Ratepayer Advocates and The Utility Reform Network (TURN) in their May 2013 OIR proposals), as the next step towards a more simplified 2-tier rate design.
    19 In the detailed rate tables presented in the Appendix, PG\&E shows current and proposed rates by functionalized rate components, most of which do not change. PG\&E's proposed changes to total rates do, though, cause changes in the Public Purpose Program (PPP), distribution, generation and conservation incentive adjustment rate components.

[^9]:    20 Under today's rates, households consuming less than 130 percent of baseline receive no discount at all.

[^10]:    22
    P.U.C. Section 739.1(c)(2).

    23
    ACR, p. 5.

[^11]:    32 A similar approach is also used to design the rates for the CARE versions of the optional TOU and seasonal rates (Schedules EL-6, EL-7 and EL-8).
    33 The baseline quantities adopted by Decision 11-05-047 were based on recorded data from November 2005 through October 2009.

[^12]:    37 Baseline quantities in 1993 remained in effect until they were adjusted in 2001.
    However, this adjustment did not follow the standard Baseline Quantity (BQ) procedure since new BQs could not be lower than their 2001 levels.

[^13]:    38 The CPUC now requires CARE customers exceeding 600 percent of baseline in a single month to either significantly lower their consumption or be removed from the CARE program. The CPUC also requires that CARE customers exceeding 400 percent of baseline in a single month must participate in PG\&E's Energy Savings Assistance Program to remain in the CARE program. See D.12-08-044, pp. 219-221.

[^14]:    Q 1 Please state your name and business address.
    A 1 My name is Dennis M. Keane, and my business address is Pacific Gas and Electric Company, 77 Beale Street, San Francisco, California.
    Q 2 Briefly describe your responsibilities at Pacific Gas and Electric Company (PG\&E).
    A 2 I am a senior manager in the Analysis and Rates Department, responsible for preparing and managing the preparation of retail electric rate design proposals for presentation before the California Public Utilities Commission (CPUC or Commission) and the Federal Energy Regulatory Commission.
    Q 3 Please summarize your educational and professional background.
    A 3 I received a bachelor of arts degree in economics (with honors) in 1974 from the University of California at Berkeley, and a Ph.D. degree in economics in 1980 from the University of Wisconsin, Madison.

    From 1978-1980, I taught in the Economics Department at the University of Southern California. In 1980, I joined PG\&E as a load research analyst, responsible for preparing PG\&E's class load research reports and designing samples for load profile metering projects. In 1982, I was promoted to coordinator of load research projects, where I managed a number of large-scale load profile metering projects. In 1984, I was promoted to supervisor of load management analysis and operations, responsible for scheduling experimental operations of PG\&E's dispatchable load management programs, as well as estimating their load impacts. In 1988, I became the supervisor of commercial/industrial electric rate design. In 1991, I accepted a position in the Market Planning and Research Department, where I managed a number of projects designed to evaluate the effectiveness and economics of distributed generation and targeted demand-side management programs designed to alleviate peaking problems on the local distribution system. I left PG\&E in 1993 for a position at the consulting firm Freeman, Sullivan \& Company, where I directed the firm's electric utility practice. I returned to PG\&E in 1996 as a senior analyst in the Service Analysis Department, and, in 2000, was promoted to a

