

From: Houck, Jason

Sent: 4/4/2014 3:42:35 PM

To:

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Cc: Allen, Meredith (/O=PG&E/OU=Corporate/cn=Recipients/cn=MEAe); Pagedar, Sujata (/O=PG&E/OU=Corporate/cn=Recipients/cn=sxpg); Parrillo, Jordan (jordan.parrillo@cpuc.ca.gov); Franz, Damon A. (damon.franz@cpuc.ca.gov)

Bcc:

Subject: Imminent Rejection of PG&E AL 4371-E

Redacted

I am sorry that PG&E has chosen the path it did in its Tier 1 AL 4371-E to define small business eligibility for the Climate Credit in a manner out of compliance with previous Commission orders.

I am sending this email as forewarning that Energy Division will be rejecting the entire advice letter specifically because PG&E's proposed Electric Rule No. 1, Definitions, Sheet 26, is out of compliance with D.12-12-033. Another advice letter filing will be required.

PG&E should begin to make the IT system changes necessary to implement the small business climate credit in a manner consistent with the Commission's definitions and orders spelled out in D.12-12-033. PG&E has had almost a year and a half to make these system changes, and in D.13-12-003 PG&E was ordered to complete these changes as of January 1, 2014.

The approach PG&E laid out in AL 4371-E angered a number of people at the Commission, and I hope PG&E will read this email as urgent guidance to finally begin taking the necessary steps to properly implement the small business climate credit according to the eligibility definition established in D.12-12-033.

We will provide additional details about requirements to file a compliant advice letter as soon as we can.

Jason Houck

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