

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 5, 2014

Brian K. Cherry
Pacific Gas & Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
Email: PGETariffs@pge.com

RE: MCE complaint regarding marketing

Dear Mr. Cherry:

We recently received the attached letter and supporting documents from Marin Clean Energy (MCE), alleging that PG&E is engaged in anti-CCA marketing activities/lobbying in violation of state law and the Code of Conduct laid out by the Commission in D.12-12-036. In order to understand the validity of the allegations by MCE and to determine whether a violation of any Code of Conduct rules has happened, we need PG&E to explain the facts surrounding this. As you know, D.12-12-036 prohibits marketing and lobbying against the CCAs by a utility unless it has an independent marketing division. In Advice Letter 4210-E, PG&E informed the Commission that it does not have any plans to engage in marketing against the CCAs. We want to make sure that PG&E is not using other entities to engage in anti-CCA marketing or lobbying activities. Please answer the following questions to enable my staff to determine whether any violation of the Code of Conduct has occurred.

1. What is PG&E's (whether the utility or the holding Corp.) relationship to the Coalition for Reliable and Affordable Electricity (CRAE) including, but not limited to, the following questions.
 - a. Is CRAE an active entity at this time?
 - b. Has PG&E ever funded CRAE or allowed use of any of PG&E ratepayer funded staff/management time on CRAE's activities?
 - c. Has PG&E ever funded the Coalition or allowed use of any of PG&E shareholder funded staff/management time on CRAE's activities?
 - d. Did PG&E ever plan or conduct any anti-CCA marketing or lobbying activities through CRAE?
 - e. Describe in detail any funding, plans and/or conduct indicated in response to other sub-divisions of question 1.
 - f. Describe and list any and all transfers of email addresses, for customers within MCE's service territory, from PG&E to CRAE.

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2. What is PG&E's (whether the utility or the holding Corp.) relationship to the Marin Common Sense Coalition (Coalition) including, but not limited to, the following questions:
 - a. Is the Coalition an active entity at this time?
 - b. Has PG&E ever funded the Coalition or allowed use of any of PG&E ratepayer funded staff/management time on Coalition's activities?
 - c. Has PG&E ever funded the Coalition or allowed use of any of PG&E shareholder funded staff/management time on Coalition's activities?
 - d. Did PG&E ever plan or conduct any anti-CCA marketing activities through the Coalition?
 - e. Referring to the "Source Information for your Email Address" section of the attached email, why does it appear the email that IBEW sent used a list of email addresses provided by the Coalition and/or is somehow otherwise connected to the Coalition?
 - f. Describe and list any and all transfers of email addresses, for customers within MCE's service territory, from PG&E to the Coalition.
 - g. Describe in detail any funding, plans and/or conduct indicated in response to other subdivisions of question 2.
3. Describe and list all communications and documents that indicates any meetings (whether in person or not), correspondence (whether written or electronic) that any of PG&E's staff and/or Officers have had since December 31, 2012 to plan, guide or fund IBEW 1245's lobbying activities against any proposed or active CCAs.
4. Describe and list all funding or in-kind support that PG&E has provided to IBEW 1245 since December 31, 2012.
5. Name all individual(s) or organization(s) that PG&E has provided financial or staff support with the goal of marketing or lobbying against proposed or active CCAs, including, but not limited to, the following questions
 - a. Has PG&E provided any such support to Jim Phelps?
 - b. Has PG&E provided any such support to Hunter Stern?

Please provide response to this letter within 10 business days. We appreciate your help in understanding the issues raised by MCE.

Sincerely,



Edward Randolph
Director Energy Division

cc: Randall Litnaker, Sid Dietz, and Redacted PG&E)