

**PACIFIC GAS AND ELECTRIC COMPANY
Community Choice Aggregation OIR 2012
Rulemaking 12-02-009
Data Response**

PG&E Data Request No.:	ED_001-02		
PG&E File Name:	CommunityChoiceAggregationOIR-2012_DR_ED_001-Q02		
Request Date:	May 5, 2014*	Requester DR No.:	001
Date Sent:	May 20, 2014	Requesting Party:	Energy Division
PG&E Witness:		Requester:	Edward Randolph

QUESTION 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 sub- divisions of question 2.

ANSWER 2

- a. No. The Coalition became inactive in 2010.
- b. PG&E provided funding and staff time to the Coalition, but not using ratepayer funds, until 2010. As with staff/management time related to CRAE's activities, employees with time related to the activities of the Coalition were instructed charge that time to a "Below the Line" account, which is funded solely by shareholder dollars and *not* ratepayer funds.
- c. Yes. See above.
- d. Yes. See above. However, the Coalition has not conducted any activity at all since 2010, and has no plans to conduct any future activity.

- e. Working jointly with IBEW and the Coalition's political consultants, the Coalition developed e-mail, mailing, and other distribution lists. These lists were developed prior to and during 2010, when the Coalition was an active entity. The Coalition ceased to be involved with the development or use of these lists in 2010. Neither the Coalition, PG&E, nor any other entities under PG&E's direction and control, had knowledge of IBEW's possible continued use of these lists until being advised of the IBEW e-mailing that resulted in this inquiry.
- f. See above. PG&E did not transfer e-mail addresses or other utility customer information to the Coalition. See also the response of IBEW's attorney dated April 28, 2014 in CommunityChoiceAggregationOIR-2012_DR_ED_001-Q02-Atch01.
- g. The Coalition was created to influence the decisions of the County of Marin and cities and towns within the County of Marin with respect to municipal participation in the provision of electricity service under California's Community Choice Aggregation (CCA) law. The Coalition has not been active since 2010 (see response to 2.d.).

* Email received on May 6, 2014