

From: Kelly Foley
Sent: 5/16/2014 2:49:38 PM
To: [Redacted]
Cc: Dietz, Sidney (/O=PG&E/OU=Corporate/cn=Recipients/cn=SBD4); [Redacted]
[Redacted]; karen.miller@cpuc.ca.gov
(karen.miller@cpuc.ca.gov); Justin Kudo (jkudo@mcecleanenergy.org)
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Bcc:

Subject: RE: Joint Rate Comparison Mailer - SCP and PG&E

Karen,

We agree with Elaine's email but want to add that SCP's decision to withdraw inclusion of GHG reporting was not made lightly and is based on:

- 1) as described in our memo, GHG reporting is not required under the code of conduct;
- 2) PGE is backing active legislation that could significantly impact this issue while we believe this belongs at the CPUC in an regular rule making;
- 3) SCP has only forecasted GHG emissions;
- 4) 2 and 3 taken together open the door for serous customer confusion. Thus, pending resolution of these complex issues, which will happen this summer, we believe abstaining from making best guess forecasts using uncertain methodology is in the best interest of ratepayers as well as legally appropriate.

Please note that because MCE and PGE voluntarily agreed to GHG reporting last year and this year AND both have actual GHG data, we have no problem with their decision to report GHG this year. SCP apologizes for initially agreeing to report GHG, but it took us a few weeks to grasp all these moving parts and understand their problematic potential impacts.

Thank you for your continued assistance.

Best,
Kelly

On May 16, 2014, at 12:56 PM, [Redacted] wrote:

Dear Karen,

PG&E and SCP have been working on the Joint Rate Comparison Mailer and we are in agreement with the content except for the CO₂ emissions chart. A copy of the residential Joint Mailer is attached.

Previously, SCP and MCE had agreed to include the emissions chart for this year's mailer. PG&E was just informed by SCP that they wish to remove the emissions chart from the SCP/PG&E joint mailers.

Decision 12-12-036, which adopted the CCA Code of Conduct, states the Commission's Public Advisor must review and approve the wording of the comparison before it is distributed to the customers and by the final approval shall resolve any disputes about the contents. At this point, we are requesting resolution to this open issue. On April 28, PG&E and SCP (on behalf of SCP and MCE) sent the parties' positions on the inclusion/exclusion of the emissions chart in the mailer.

There is agreement between SCP and PG&E on the number of mailers that will be sent to all customers within SCP's service area. Each customer will receive one of them depending on the rate schedule the customer is on:

- [Redacted] Residential E-1 TOU/RES-1
- [Redacted] Small Commercial A-1 TOU/COM-1 TOU
- [Redacted] Medium Commercial A-10S non-TOU/COM-10A non-TOU

We are trying to finalize the mailer around May 22 so we can get it to the

printers for a June mailing. If you have any questions, PG&E and SCP will be available to answer them.

Best regards,

Redacted

Regulatory Case Manager

Pacific Gas and Electric Company

Redacted

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

<SCP-mailers-RES-v3.pdf>