

From: Miller, Karen
Sent: 5/19/2014 4:26:09 PM
To: [Redacted]; Kelly Foley
(kfoley@sonomacleanpower.org)
Cc: Dietz, Sidney (/O=PG&E/OU=Corporate/cn=Recipients/cn=SBD4); [Redacted]
[Redacted]; Dawn Weisz
(dweisz@mcecleanenergy.org) (dweisz@mcecleanenergy.org); Justin Kudo
(jkudo@mcecleanenergy.org) (jkudo@mcecleanenergy.org); Christensen, Robin M
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=RMHQ); Brown, Carol A.
(carol.brown@cpuc.ca.gov); DeVine, Kyle (kyle.devine@cpuc.ca.gov); Hill, Juanita
(juanita.hill@cpuc.ca.gov); Klaiber, Steven (Steven.Klaiber@cpuc.ca.gov); Jamie
Tuckey (jtuckey@mcecleanenergy.org) (jtuckey@mcecleanenergy.org); Jonna
Ramey (jramey@sonomacleanpower.org); Geof Syphers
(gsyphers@sonomacleanpower.org); McMahon, Loreen
(loreen.mcmahon@cpuc.ca.gov); Kaur, Ravneet (Ravneet.Kaur@cpuc.ca.gov)
Bcc:
Subject: RE: Joint Rate Comparison Mailer - SCP and PG&E

Dear Ms. Foley,

I am responding regarding the Joint Rate Comparison Mailer that is supposed to be mailed soon, as a joint document between Sonoma Clean Power (SCP), Marin Clean Energy (MCE) and Pacific Gas and Electric (PG&E). Previously, SCP, MCE and PG&E had, after lengthy discussion, agreed to include emissions data in in the CO₂ emissions chart in that mailer. On Friday, May 16th, you indicated on behalf of SCP, that SCP had decided not to include their emissions data for this year's mailer. As you know, all companies participating in the joint mailer must agree to the contents of the mailer. In deciding to not include SCP's emissions data, you are holding up the necessary printing and mailing of the joint mailer.

I consulted with President Peevey's office about SCPs decision. I was told that SCP has three options:

1. Provide SCP's emission information, with a bullet that states, "forecast only."
2. Have a sentence in place of the emissions information that states, "SCP is refusing to provide this information to their customers."
3. Meet on Wednesday afternoon, May 21st, with Carol Brown, Chief of Staff to President

Peevey, and Karen Miller, Public Advisor, to discuss why neither of the above two options are workable and what SCP proposes instead.

Please know that PG&E and MCE will be authorized to move forward on their agreed upon joint mailer, which includes their agreed upon emissions table, as of close of business (5:00 pm), May 22nd, which is the day that PG&E has indicated is the deadline for sending the joint mailer to the printers. Please inform Carol Brown and Karen Miller as to which of the above three options you wish to pursue by close of business, May 21st.

Thank you,

Karen Miller

Public Advisor

Consumer Service and Information Division

California Public Utilities Commission

415-703-2299

From: Kelly Foley [mailto:kfoley@sonomacleanpower.org]

Sent: Friday, May 16, 2014 2:50 PM

To: [Redacted]

Cc: Miller, Karen; [Redacted] Dietz, Sidney; Justin Kudo (jkudo@mcecleanenergy.org); Dawn Weisz (dweisz@mcecleanenergy.org); Jamie Tuckey (jtuckey@mcecleanenergy.org); DeVine, Kyle; Hill, Juanita; Klaiber, Steven; Geof Syphers; Christensen, Robin M; Jonna Ramey

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:

- Residential E-1 TOU/RES-1
- Small Commercial A-1 TOU/COM-1 TOU
- 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>