

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company for Authority, Among Other Things,
to Increase Rates and Charges for Electric and
Gas Service Effective on January 1, 2014.

(U 39 M)

And Related Matter

Application 12-11-009
(Filed November 15, 2012)

Investigation 13-03-007

**OPENING COMMENTS OF
SMALL BUSINESS UTILITY ADVOCATES
ON PROPOSED DECISION OF ALJ PULSIFER**

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Dated: July 8, 2014

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Pursuant to Rule 14.3 of the California Public Utilities Commission (Commission), Small Business Utility Advocates (SBUA) hereby submits these comments on Administrative Law Judge (ALJ) Pulsifer's Proposed Decision (PD).

ALJ Pulsifer's PD adopts, without change, the settlement agreement in Phase I of Pacific Gas & Electric Company's (PG&E) 2014 General Rate Case (GRC) entered into by and between SBUA and PG&E (the SBUA/PG&E Settlement). The SBUA/PG&E Settlement addresses a number of issues important to small commercial customers, including: improving services to small business with more outreach and support and by enhancing tracking systems to identify these customers; increasing contracting opportunities for small businesses in the supply chain sustainability program; supporting small electric generators; facilitating contracting opportunities for small businesses to provide innovative energy solutions to PG&E; educating small businesses of any opportunities to participate in PG&E's greenhouse gas compliance and carbon offsets activities; and providing economic development opportunities that support and promote small businesses.¹ The adoption of this settlement therefore would be a significant benefit to the small commercial customer class and in the public interest.²

¹ Proposed Decision, p. 656, also Findings of Fact, p. 708.

² See Rule 12.1(d) of the Commission.

SBUA appreciates ALJ Pulsifer's approval of the SBUA/PG&E Settlement and supports its expeditious adoption in any final decision. SBUA also appreciates PG&E's willingness to work with the small business community to advance its utility-related concerns.

SBUA is the only party in this proceeding to focus *exclusively* on the small business community as a whole, whose interests as small commercial customers diverge from residential ratepayers and large businesses on many utility matters, including determining equitable and fair revenue allocations. Because SBUA believes that small businesses historically have not been adequately represented at Commission, the SBUA/PG&E Settlement is a positive step in helping to ensure the small business community is included and has a greater voice in the Commission's general rate cases.

As a minor addition, SBUA recommends the Commission add the acronym "SBUA" to the Appendix B list of acronyms.

For the foregoing reasons, SBUA hereby requests that the Commission fully adopt the SBUA/PG&E Settlement in any final decision.

Respectfully Submitted,

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By: 

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