



**Meredith Allen**  
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Energy Division Tariff Unit  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Subject: Pacific Gas and Electric Company's Comments to Draft Resolution E-4674 Approving PG&E's Proposed Revisions to the Electric Schedule S, Standby Service (PG&E Advice 3951-E-B)**

Dear Energy Division Tariff Unit:

Pacific Gas and Electric Company ("PG&E") respectfully submits its comments on Draft Resolution E-4674 ("Resolution"), which approves PG&E's proposed revisions to the Electric Schedule S, Standby Service, Special Condition 15 (Schedule S) to assess certain retail charges on station power load for generators that participate in the California Independent System Operator's (CAISO) Station Power Protocol.

PG&E urges approval of Resolution E-4674 but respectfully requests that the effective date be December 18, 2012, in order to align with the date proposed by PG&E in Advice Letter 3651-E-B. It is reasonable to limit the retroactive treatment of the standby service tariff for SPP customers to December 18, 2012 because that is the date when the conflict between FERC's station power policy and CPUC jurisdiction was finally resolved. Because FERC's August 30 2010 Order on Remand was subject to appeal, and there was considerably lengthy regulatory uncertainty associated with this matter, PG&E continues to support December 18, 2012, the date when the D.C. Circuit denied the generators' petition and affirmed FERC's decision on remand.

Sincerely,

A handwritten signature in cursive script that reads "Meredith Allen /KHC".

Senior Director, Regulatory Relations

cc: President Michael R. Peevey  
Commissioner Michel P. Florio  
Commissioner Carla J. Peterman  
Commissioner Michael Picker  
Commissioner Catherine J.K. Sandoval  
Karen V. Clopton, Acting General Counsel

Timothy J. Sullivan, Acting Chief Administrative Law Judge  
Edward Randolph, Director, Energy Division  
Energy Division Tariff Unit  
Louis Torres, Energy Division, CPUC  
Jonathan Tom, Energy Division, CPUC  
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