PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMMISSION ADVISORY AND COMPLIANCE DIVISION
Energy Branch

RESOLUTION E-3352
December 17, 1993

RESOLUTION

RESOLUTION E-3352. PACIFIC GAS AND ELECTRIC COMPANY REQUEST TO REVISE ITS ELECTRIC AND GAS BASE REVENUES EFFECTIVE ON JANUARY 1, 1994, TO IMPLEMENT THE 1994 ATTRITION RATE ADJUSTMENT ADOPTED IN ITS 1993 GENERAL RATE CASE, DECISION 92-12-057.

BY ADVICE LETTER 1447-E AND 1801-G FILED ON OCTOBER 1, 1993.

SUMMARY

1. These advice letters request revision of Pacific Gas and Electric Company's (PG&E) electric and gas base revenues effective January 1, 1994, to implement the 1994 Attrition Rate Adjustment (ARA) adopted in PG&E's 1993 General Rate Case Decision (D. 92-12-057).

2. Four protests to these advice letters were received. Protests were filed by Industrial Users (IU), California Manufactures Association (CMA), and California Large Energy Consumer Association (CLECA). In addition, Toward Utility Rate Normalization (TURN) and the Division of Ratepayer Advocates (DRA) filed a joint protest. These protests are denied without prejudice.

3. This Resolution approves the operational and rate base attrition, adjust PG&E's authorized rate of return in compliance with D. 93-12-022, and other selected changes in its base revenue amounts.

BACKGROUND

1. PG&E's filings seek to revise its electric and gas base revenues effective January 1, 1994, to implement the 1994 ARA adopted in PG&E's 1993 GRC D. 92-12-057.

Electric Rates

2. On April 13, 1993, PG&E announced it intended to freeze its retail electric rates through 1994. PG&E's Electric Cost Adjustment Clause (ECAC) filing, A. 93-04-028, reflects the rate freeze proposal as it affects the recovery of fuel costs through the ECAC Mechanism and the amortization of the balance in the Electric Revenue Adjustment Mechanism (ERAM) account. PG&E's Electric Department's attrition advice letter similarly proposes a combined zero net change for all revenue requirement items which would be effective January 1, 1994.

3. To achieve the 1994 electric rate freeze, PG&E proposes to hold at current levels both electric energy revenues and electric base revenues, which together comprise the total electric revenue requirement. PG&E's proposal to hold electric energy revenues constant was made in its ECAC/Annual Energy Rate/ERAM proceeding, Application (A.) 93-05-028, filed April 15, 1993.

4. PG&E's proposal to hold electric base revenues constant is being made in this filing. The goal of a zero net change in PG&E's 1994 electric base revenues is accomplished by consolidating the effects of three rate decisions with the 1994 ARA:

a) D. 88-12-083, which adopted the Diablo Canyon Settlement Agreement, regarding the Diablo Canyon Basis Revenue Requirement.

b) D. 93-05-025, which required that PG&E propose a mechanism to reflect in rates the net savings attributable to PG&E's Work Force Management Program.

c) The decision expected by the end of 1993 in PG&E's Cost of Capital proceeding, A. 93-05-009.

5. In addition, PG&E proposes to revise the base revenue amount to reflect reductions in the forecast of expenses for Post-Retirement Benefits Other Than Pensions (PBOPs) previously authorized in D. 92-12-015 and D. 92-12-057.

6. PG&E estimates that the revenue requirement reductions from the items listed above will be greater than the Attrition increase. PG&E proposes that this difference be used to amortize the balance in PG&E's Electric Revenue Adjustment Account.

7. The core of this request is the $160.777 million ARA amount authorized in D. 92-12-057 for the 1994 attrition year, including the effects of the Property Tax Settlement Adjustment and the TEFRA Memorandum Account recovery. PG&E has made the following adjustments to the adopted ARA amount to yield a 1994 ARA increase of $33.949 million:

a) Decrease escalation of labor expenses by $844,000, non-labor expenses by $3,057,000, and medical expenses by $337,000 to reflect more current inflation information, as allowed in D. 85-12-076 and D. 92-12-057.

b) Decrease financial costs by $115,794,000 based on the rate of return authorized in D. 93-12-022 in the 1994 Cost of Capital proceeding. This financial cost decrease applies to the 1994 rate base adopted in D. 92-12-057.

c) As announced on April 13, 1993, PG&E does not seek an increase in electric revenue requirements to reflect the changes in federal taxes contained in the Omnibus Budget Reconciliation Act of 1993. PG&E thus foregoes a 1994 revenue requirement of approximately $18.9 million solely for the increase in the corporate income tax rate, and a similar amount for 1993.

8. In addition to the 1994 ARA base revenue increase, this filing consolidates other base revenue changes anticipated on January 1, 1994. The components of the additional base revenue changes are:

a) PBOBs: PG&E has reduced its estimates of PBOPs costs for 1993 and 1994. In addition, PG&E has instituted a cost sharing plan for PBOPs medical benefits for its retired employees effective January 1, 2000 as part of its efforts to reduce rates by controlling its labor related costs where practicable. PG&E's payments for retirees' medical premiums will be capped with increases in premiums after that date paid for by the retirees. The limit on the level of future premium payments reduces the the amount of PBOPs expense accrued after July 1, 1993, and during 1994. The reduced expense for 1994 reduces the 1994 base revenue amount by $45,600,000. The reduction for 1993 will be credited to the ERAM balancing account, which reduces the revenue requirement for 1994 by $29,000,000.

b) Work Force Reduction Rate Mechanism (WRRM): PG&E proposes a reduction in its base revenue amount of $53,304,000 to reflect in rates the amortization of the net savings resulting from its Work Force Management Program.

c) Diablo Canyon Basic Revenue Requirement (DCBRR): Appendix C of D. 88-12-083 describes the DCBRR to be included in base revenues. The change in the DCBRR for 1994 at the authorized rate of return in the Cost of Capital Decision (D. 93-12-022), is a base revenue decrease of $14,947,000.

9. Excluding the effect of the PBOPs adjustment on 1993 rates, PG&E's base amount will decrease by $73,105,000 on January 1, 1994.

Gas Rates

10. The requested ARA for 1994 is an increase of $53.791 million in revenue requirement. In addition, the revised base revenues and rates represent a consolidation of the effects of decisions previously issued by the Commission in two different proceedings.

11. As directed by D. 93-05-025, this filing reflects PG&E's proposal to reduce base revenues to amortize the net savings attributable to PG&E's Work Force Management Program. PG&E also proposes to revise the base revenue amount to reflect reductions in forecast PBOPs expenses previously authorized in D. 92-12-015 and D. 92-12-057.

12. PG&E also consolidated the Cost of Capital proceeding, A. 93-05-009, and the gas CEE shareholder incentive request in PG&E's ECAC/AER/ERAM proceeding, A. 93-04-028.

13. The estimated amount of the consolidated increase in the base revenue amount and in the revenues recovered through rates, effective January 1, 1994, is an increase of $7.821 million and a decrease of $523,000, respectively.

14. The core of this request is the $85.381 million ARA amount authorized in D. 92-12-057 for the 1994 attrition year, including the effects of the Property Tax Settlement Adjustment and the TEFRA Memorandum Account recovery. PG&E has made the following adjustments to the adopted ARA amount to yield a 1994 ARA increase of $53.791 million:

a) Decrease escalation of labor expenses by $373,000, non-labor expenses by $1,111,000, and medical expenses by $151,000 to reflect more up to date inflation information, as allowed in D. 85-12-076 and D. 92-12-057.

b) Decrease financial costs by $36,552,000 based on the rate of return authorized in D. 93-12-022 in the 1994 Cost of Capital proceeding. This financial cost decrease applies to the 1994 rate base adopted in D. 92-12-057.

c) Increase the 1994 revenue requirement by $6,076,000 to reflect the federal income tax rate change from 34 percent to 35 percent that was included in the Omnibus Budget Reconciliation Act of 1993. The impact of the rate change for 1993 and all other impacts of the Omnibus Budget Reconciliation Act of 1993 will be included in the gas 1993 Federal Tax Reform Legislation Memorandum Account.

15. In addition to the 1994 ARA base revenue increase, this filing consolidates other base revenue changes anticipated on January 1, 1994. The components of the additional base revenue changes are:

a) PBOBs: PG&E has reduced its estimates of PBOPs costs for 1993 and 1994. In addition. PG&E has instituted a cost sharing plan for PBOPs medical benefits for its retired employees effective January 1, 2000 as part of its efforts to reduce rates by controlling its labor related costs where practicable. PG&E's payments for retirees' medical premiums will be capped with increases in premiums after that date paid for by the retirees. The limit on the level of future premium payments reduces the amount of PBOPS expense accrued after July 1, 1993 and through 1994. The reduced expense for 1994 reduces the 1994 base revenue amount by $21,400,000. The reduction for 1993 will be credited to the Core and Noncore Fix Cost Accounts, which reduces the revenue requirement for 1994 by $13,600,000.

b) WRRM: PG&E proposes a reduction in its base revenue amount of $24,570,000 to reflect in rates the amortization of the net savings resulting from its Work Force Management Program.

c) Customer Energy Efficiency (CEE): PG&E's ECAC filing, A. 93-04-028, requests an increase in CEE shareholder incentives of $5,256,000 which is consolidated in this filing for inclusion in revised gas rates to be effective January 1, 1994, but will not increase PG&E's base revenues.

16. Excluding the effect of the PBOPs adjustment on 1993 rates, PG&E's base amount will increase by $7,821,000 on January 1, 1994.

<u>NOTICE</u>

1. PG&E made public notification of AL 1447-E and 1801-G by mailing copies of the advice letter to other utilities, governmental agencies, and all parties who requested such information. In addition, notice of the advice letters was published in the Commission calendar on October 8, 1993.

<u>PROTESTS</u>

1. The Commission Advisory and Compliance Division (CACD) has received four protests on PG&E's advice letters.

<u>Industrial Users</u>

2. IU filed its protest on October 20, 1993. IU's position is that PG&E clearly intended to forego the 1994 attrition rate adjustment as detailed in an April 13, 1993, letter PG&E sent to Commissioner Fessler and issued a public statement announcing its intent to "freeze" electric retail rates at present levels through the end of 1994. To effect this "net zero" revenue change, PG&E proposed to:

* defer approximately $125 million in ECAC electric rate increases to 1995;

* forego recovery of an estimated $100 million in tax increases; and,

* forego electric rate increases that would otherwise occur on January 1, 1994 through the Attrition Rate Adjustment (ARA) mechanism, such that electric rates will not increase through the end of 1994. The ARA offsets the effects of inflation and changes in rate base and is estimated to be $160 million in 1994." (Letter to Commissioner Fessler, p. 1).

3. IU believes that the clear import of these comments is that PG&E intended to forego the 1994 ARA as a necessary measure to implement its rate freeze proposal, and to take further steps to reduce its electric rates. PG&E has abandoned its promise to forego the ARA and its promise to cut costs. Base revenue reductions arising from PG&E's Cost of Capital proceeding are not cost savings resulting from "tough management" of PG&E's costs. In addition, PG&E's indicated that it would return any savings resulting from its workforce reduction program to ratepayers. To allow PG&E to abrogate such commitments is not the right message to send to industrial ratepayers.

4. It is IU's position that PG&E's rate freeze proposal should not be applied separately to the ECAC and non-ECAC revenue requirements. PG&E is proposing two separate electric rate freezes, one for its ECAC proceeding (requiring the deferral of $260 million in revenue increases to 1995) and a separate rate freeze for its non-ECAC proceedings (where PG&E seeks to implement the ARA to offset revenue decreases). IU find no justification for PG&E's plan for two separate rate freezes. PG&E should offset any non-ECAC related revenue decreases by reducing the deferral of $260 million in ECAC revenue increases. This would satisfy PG&E's perceived need for a "net zero" revenue change; significantly reduce the deferral of ECAC revenues, thereby lessening the chance for future rate shock; and, allow PG&E to fulfill its commitment to forego the ARA for 1994.

5. On the basis of the foregoing, IU respectfully request that PG&E's proposal to implement the 1994 Attrition Rate Adjustment be denied.

<u>Toward Utility Rate Normalization & Division of Ratepayer Advocates</u>

6. TURN and DRA filed a joint protest on October 21, 1993.

7. TURN and DRA urge the Commission to suspend PG&E's operational and ratebase attrition and flow all savings in operating costs to customers for 1994. They contend that the attrition mechanism is no longer needed because the economic conditions in which it was introduced are no longer present, that PG&E is in fact only postponing its electric rate increase while an increase in gas rates is not even postponed. The protestants

ask the Commission to hold PG&E to its promise made in April 1993, viz., that it would freeze its rates by foregoing attrition increases. Increases in gas revenue are particularly inappropriate because of the competitive situation. They point out that the number of PG&E customers has not grown, that there has been a force reduction which PG&E states saved $53.3 million (a figure which TURN and DRA question), that there has been virtually no inflation and that PG&E also should make sacrifices in a depressed economy. The two protestants further contend that ECAC and ERAM undercollections turned out to be greater than estimated and that PG&E manipulated the figures so that any rate freeze is in appearance only. In their view customers should benefit from debt refinancing and attrition based rate increases would enhance PG&E's anti-competitive profile.

8. In conclusion, TURN and DRA stated that the attrition mechanism might have been a useful tool when it was first implemented, but its usefulness has long since passed. Rather than grant PG&E the automatic annual revenue requirement increase which the mechanism has come to represent, the Commission should suspend attrition indefinitely at this time.

California Manufactures Association

9. CMA filed its protest on October 21, 1993.

10. According to the CMA, the entire concept of an ARA for PG&E is out of place in the present economy of California. While PG&E has offered an electric rate freeze through 1994 as its contribution to easing the problems of the economy, it can and should do more. PG&E should not be allowed to use an automatic adjustment for attrition to offset cost reductions which would otherwise produce rate reductions. Business, industry, and the people of California in general all need as much relief as possible from PG&E's electric rates that continue to be more than 50% higher than the national average electric rates.

11. CMA endorses and adopts the reasoning and proposals set forth by IU in their October 20, 1993, protest. For the foregoing reasons, CMA respectfully requests the Commission to deny PG&E's proposal to implement its 1994 ARA.

California Large Energy Consumers Association

12. CLECA filed its protest on October 21, 1993. CLECA is an organization comprised of high voltage high load factor industrial customers of PG&E and Southern California Edison Company (Edison), and has participated in numerous PG&E rate proceedings in recent years on behalf of its members which are customers of the utility. CLECA is opposed to PG&E's request for approval of operational and rate base attrition adjustments for calendar year 1994, and requests that it be afforded an opportunity to present evidence and argument why the 1994 Attrition Adjustment should not be granted.

12. In May of this year, CLECA and others filed a petition to modify the decision which authorized attrition mechanisms for

PG&E. In that filing, CLECA argued for a suspension of the operational and rate base attrition mechanisms pending a return of early 1980's levels of inflation. CLECA incorporates herein those arguments for suspension of attrition by this reference.

13. CLECA proposes that the attrition increases should be suspended immediately and the other identified revenue requirement decreases be used to offset a portion of the ECAC/ERAM deferral amount. CLECA's approach would be consistent with PG&E's announced intention to freeze its electric rates through the end of 1994. CLECA understood that statement to mean that the utility would not seek approval for inclusion in its revenue requirement of the 1994 attrition amount, either through immediate rate increases or deferred rate increases. CLECA is concerned that PG&E has been less than fully candid in its treatment of the interested parties and the Commission on this issue. PG&E promised to forego its attrition increases for 1994 and now it is asking for authority to recover them.

14. CLECA respectfully requests that the Commission reject PG&E's advice letter and that it order the suspension of the utility's operational and rate base attrition mechanisms at least for calendar year 1994. CLECA will participate with other parties in the analysis of a longer-term suspension of these mechanisms.

<u>PG&E's Response to the Protests</u>

15. PG&E filed a response to the four protests on October 29, 1993.

16. According to PG&E, with limited exception, the protests do not discuss the content of the advice letters per se, but rather seek to convince the Commission that PG&E has violated its promise to seek to freeze electric rates through 1994 and that the Commission should suspend or abolish the attrition mechanism. In addition, the issue of whether the Commission should review its policy regarding the attrition mechanism has been placed before the Commission in another proceeding and should not be considered here.

17. PG&E's specific response to these protests is simple and straightforward:

* PG&E responded effectively to current economic conditions and has volunteered to share its customers' "economic pain" by not collecting from ratepayers in current or future rates approximately $140 million that PG&E would otherwise be entitled to recover in rates during 1993 and 1994;

* PG&E has fully lived up to both the letter and the spirit of its self-imposed Electric Rate Freeze Initiative;

* Pursuant to D. 92-12-057, PG&E is entitled to a 1994 ARA, and the protests are untimely collateral attacks on that decision;

* This Commission has explicitly concluded and, subsequently reaffirmed the view that despite reduced current levels of inflation, attrition adjustments, which take into account lower inflation levels, are a necessary part of a regulatory plan where a three-year rate case cycle is maintained; and

* The portions of the above-mentioned protests that advocate the elimination or indefinite suspension of PG&E's ARA mechanism in light of the current inflation rate are procedurelly impermissible responses to PG&E's ARA advice letters.

18. In short, the protests raise no legitimate legal or factual issues which would warrant rejection or even modification of PG&E's advice letters.

DISCUSSION

1. With regard to the protests filed by IU, TURN & DRA, CMA, and CLECA, CACD recommends that the protests be denied without prejudice because the attrition filing is not the appropriate procedure to file for the termination of PG&E's attrition mechanism.

2. PG&E was authorized to file attrition adjustments for 1994 and 1995 based on the results of operation adopted in D. 92-12-057, ordering paragraph 4.

3. A summary of the changes that PG&E is seeking is appended to the resolution as Attachment 1, for PG&E's electric department, and Attachment 2, for PG&E's gas department.

4. PG&E has modified its authorized operational attrition to reflect the updated escalation rates to reflect newer numbers. PG&E is allowed to include in its attrition filing updated escalation rates per D. 85-12-076 (19 CPUC 2d, 453, 473). The revised operational attrition numbers for PG&E's Electric and Gas Departments are $40.417 million and $15.447 million, respectively. CACD has reviewed PG&E's operational attrition adjustment and does not take exception to it.

5. PG&E is only seeking recovery of the rate base attrition numbers included in D. 92-12-057 for its Electric Department. For its Gas Department, PG&E only modified the rate base attrition numbers to reflect the higher taxes caused by the 1993 Omnibus Reconciliation Act. (PG&E is not seeking recovery of the 1993 Omnibus Reconciliation Act for its Electric Department consistent with its letter to Commissioner Fessler, dated April 13, 1993.) PG&E is allowed to include in its attrition filing changes in tax rates per D. 85-12-076 (19 CPUC 2d, 453, 476). The revised rate base attrition numbers for PG&E's Electric and

Gas Department are $119.416 million and $69.821 million, respectively. CACD has reviewed PG&E's rate base attrition adjustment and does not take exception to it.

6. On December 3, 1993, the Commission issued D. 93-12-022, that revised PG&E's authorized cost of capital from 10.13% to 9.21%. The effect of this change results in a decrease of PG&E's costs for its Electric and Gas Departments of $115.794 million and $36.552 million, respectively. CACD has reviewed PG&E's calculation of the cost of capital component of PG&E's advice letters and does not take exception to it.

7. PG&E is also seeking to include in its rates the base tax increase on its Gas Department's existing rates in its attrition filing. PG&E is allowed to include in its attrition filing changes in tax rates per D. 85-12-076 (19 CPUC 2d, 453, 476). The cost of using the revised federal income tax rate is 6.076 million. CACD has reviewed the base tax amount that PG&E is seeking recovery for and does not take exception to it.

8. Two other adjustments were ordered in D. 92-12-057 to be included in PG&E's 1994 ARA filing. These two adjustments were for PG&E's TEFRA Memorandum Account and PG&E's Property Tax Settlement with the State Board of Equalization. The result of these two adjustments are to decrease PG&E's Electric and Gas Department Base Revenues by $3.294 million and $1.001 million, respectively. CACD does not take exception with these two items.

9. PG&E instituted a cost sharing plan for PBOPs medical benefits for its retired employees effective January 1, 2000, as part of its efforts to reduce rates by controlling its labor related costs where practicable. PG&E's payments for retirees' medical premiums will be capped with increases in premiums after that date paid for by the retirees. The limit on the level of future premiums payments reduces the amount of PG&E's PBOP expenses accrued after July 1, 1993, and during 1994. The decrease for PG&E's 1994 Electric and Gas Department revenue requirement is $45.600 million and $21.4 million, respectively. In addition PG&E is proposing to return the savings in 1993 by reducing the ERAM Balancing Account and the Core & Noncore Fixed Cost Accounts by $29.000 million and $13.600 million, respectively. CACD does not take exception with PG&E's calculation of the PBOPs savings amount.

10. PG&E is also decreasing its base revenues to reflect the savings associated with its WRRM. In a report to the Commission, dated October 1, 1993, PG&E estimated that its workforce reduction program would save its Electric Department $106.609 million, and its Gas Department $49.140 million from its inception until the end of 1995. PG&E requested to return half of this amount in 1994, and the other half in 1995. These amounts have not been audited by the Commission at this time. Prior to the closing of this account, the Commission needs to review the WRRM memorandum account for reasonableness. CACD does not take exception with PG&E's request to amortize the effect of the WRRM over a two year period.

11. PG&E's is also seeking an adjustment to its Diablo Canyon Basic Revenue Requirement. This adjustment is to reflect the new cost of capital and the new tax rate on Diablo Canyon's basic revenue requirement. The result of these changes are $14.974 million for PG&E's Electric Department. CACD has reviewed PG&E's calculation of the adjustment to PG&E's Diablo Canyon basic revenue requirement and does not take exception with it.

12. The last adjustment that PG&E is making is to include in its Core & Noncore Fixed Cost Account the CEE Incentives that were requested in A. 93-04-028. The amount of PG&E's CEE Incentive will be determined in PG&E's ECAC Decision (A. 93-04-028) that will be issued on December 17, 1993. PG&E will only be allowed to record in its Core & Noncore Fixed Cost Account the CEE Incentives that were authorized in that Decision.

13. The total of PG&E's attrition adjustment is to decrease PG&E's Electric Department's 1994 Base Revenue by $73.105 million, and to increase PG&E's Gas Department's 1994 Base Revenue by $7.821 million. In addition, PG&E will credit the ERAM and Core & Noncore Fixed Cost Accounts by $29.000 million and $8.344 million, respectively.

14. PG&E has requested to hold constant at current levels both electric energy revenues and electric base revenues, which together comprise the total electric revenue requirement. PG&E's proposal to hold electric energy revenues constant was made in its ECAC/AER/ERAM proceeding, A. 93-04-028. By authorizing PG&E to hold its electric base revenues constant, PG&E will be able to use these savings to offset the expected increases that PG&E will seek to recover in 1995. CACD does not take exception to PG&E's request to hold its electric base revenues constant at this time.

FINDINGS

1. The protests filed on these advice letters by IU, TURN & DRA, CMA and CLECA are denied without prejudice.

2. PG&E was authorized to file attrition adjustments for 1994 and 1995 based on the results of operation adopted in D. 92-12-057, ordering paragraph 4.

3. The amounts that PG&E are seeking to recover are reasonable and are consistent with prior Commission precedence.

4. CACD recommends that prior to the closing of the WRRM memorandum account, the Commission review the WRRM memorandum account for reasonableness.

5. The amount of PG&E's CEE Incentive will be determined in PG&E's ECAC Decision (A. 93-04-028) that will be issued on December 17, 1993. PG&E will only be allowed to record in its Core & Noncore Fixed Cost Account the CEE Incentives that were authorized in that Decision.

6. PG&E is allowed to hold its electric base revenues constant, and to use its Electric Department revenue requirement decrease to offset its 1995 Electric Department's rate increases.

THEREFORE, IT IS ORDERED that:

1. The tariffs contained in Pacific Gas and Electric Company's Advice Letters 1447-E and 1801-G shall be effective January 1, 1994.

2. Prior to the closing of PG&E's Work Force Reduction Rate Mechanism memorandum account, the Commission shall review PG&E's Work Force Reduction Rate Mechanism memorandum account for reasonableness.

3. PG&E shall be allowed to hold its electric base revenues constant, and to use its Electric Department revenue requirement decrease to offset its 1995 Electric Department's rate increases.

4. PG&E will only be allowed to record in its Core & Noncore Fixed Cost Account the Customer Energy Efficiency Incentives that were authorized in its ECAC Decision from Application 93-04-028 that will be issued on December 17, 1993.

5. The protests that were filed by the Industrial Users, Towards Utility Rate Normalization and the Division of Ratepayer Advocates, the California Manufacturers Association, and the California Large Energy Consumers Association to these advice letter are denied without prejudice.

6. Advice letters 1447-E and 1801-G shall be marked to show that it was approved by Resolution E-3352, with an effective date of January 1, 1993.

7. This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on December 17, 1993. The following Commissioners approved it:

Neal J. Shulman

NEAL J. SHULMAN
Executive Director

DANIEL Wm. FESSLER
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