BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Address Utility Cost and Revenue Issues Associated with Greenhouse Gas Emissions.	))))	R.11-03-012 (Filed March 24, 2011)

JOINT COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E), AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) ON THE ADMINISTRATIVE LAW JUDGES' RULING ON THE IMPACT OF SENATE BILL 1018

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Pursuant to the *Administrative Law Judges' Ruling Soliciting Comment from Parties on Impact of Senate Bill 1018*, dated July 11, 2012 (the "Ruling"), Pacific Gas and Electric Company ("PG&E"), Southern California Edison Company ("SCE"), and San Diego Gas & Electric Company ("SDG&E" and jointly, the "Joint IOUs") respectfully submit these comments in response to the questions in the Ruling.

I. INTRODUCTION AND EXECUTIVE SUMMARY

Over the past year and a half, the Administrative Law Judges ("ALJs"), Energy Division staff and many interested stakeholders have been actively engaged in determining how to use the revenues that the three large investor-owned utilities ("IOUs") will receive from the sale of cap-and-trade allowances. Recently, the Legislature passed Senate Bill ("SB") 1018[1] providing direction to the Commission on the use of these revenues. Specifically, SB 1018 provides that most revenues should be "credited directly" to only certain named categories of customers (residential, small business, and emissions-intensive, trade exposed ("EITE")). The named

[1] Codified as Public Utilities Code § 748.5.

categories of customers are not further defined. While SB 1018 also authorizes that up to 15 percent of revenues may be allocated for very limited purposes other than bill relief, the practical impact in the absence of further statutory authorization is that SB 1018 requires 100 percent of allowance revenues to be credited directly to only certain limited categories of customers.

The Joint IOUs have consistently supported returning the allowance revenues to electricity customers in proportion to the costs they incur under the cap-and-trade program. SB 1018 falls drastically short, however, by requiring the return to only certain categories of customers and thus failing to protect all electricity customers that bear the costs of Assembly Bill ("AB") 32 programs including cap-and-trade. By limiting the return of revenues to residential, small business customers and EITE customers, SB 1018 would leave hospitals, schools and universities, state and local governments, agriculture, mass transit and many other critical entities to experience potentially significant bill increases. And while the terms "small business" and "EITE" are not defined in SB 1018, there is simply no way to define these terms broadly enough to prevent customers critical to California's economy from being harmed by increased electricity prices.

Accordingly, while the Joint IOUs provide some recommendations and responses to the ALJs' questions on interpreting SB 1018, it is clear that only clean-up legislation can ensure that ***all*** customers are fairly protected from rate increases resulting from the cap-and-trade program, in accordance with the Joint IOU Proposal submitted in this proceeding.

II.
THE TERM "SMALL BUSINESS" CUSTOMER MAY BE IMPOSSIBLE TO DEFINE FAIRLY, BUT SHOULD, AT THE VERY LEAST, BE DEFINED TO MITIGATE EXPENSIVE AND TIME-CONSUMING BILLING CHANGES AND MONITORING

Any attempt to define the term "small business" under SB 1018 demonstrates the inequities and practical difficulties that necessarily result from SB 1018's restrictions. On the one hand, bright-line, usage-based thresholds to define "small business" customers may mitigate the administrative impracticality of the definition but would still expose many customers to

significant rate increases.   On the other hand, more nuanced definitions, such as those used by state and federal small business statutes and agencies, would require IOUs to engage in time-consuming and costly information gathering and verification processes. While the IOUs prefer a usage-based approach to defining "small business," none of the options discussed herein avoid the significant problems, delays and inequities inherent in SB 1018.[2] In the end, the use of the phrase "small business" in SB 1018 does more to demonstrate the need for clean-up legislation than it does to ensure that vulnerable electricity customers are adequately or fairly protected against AB 32 bill impacts.

A. The 200 kW Threshold For Small Businesses Proposed By The Joint IOUs In the Direct Access Proceeding is the Most Practicable Definition of "Small Business" But Is Still Unfair and Difficult to Administer

In recent joint IOU comments in the second phase of the direct access ("DA") rulemaking,[3] the IOUs proposed defining "small businesses" by distinguishing them from large customers whose demand is 200 kW or greater for three months within a twelve month historical period.[4] Should SB 1018 not be amended by "clean-up" legislation, the IOUs recommend using the same threshold in this proceeding as well, because it provides a more practicable way for IOUs to identify small business customers and avoid many of the information-gathering and policing issues associated with the other approaches. Likewise, as discussed herein, this threshold would provide a somewhat broader small business definition than lower thresholds that are primarily meant to cover "micro-businesses" (i.e., those under a 20 kW threshold). As

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[2] Appendix A shows the number of customers and percent usage under each definition of small business described herein.

[3] In the first phase of the DA proceeding (R.07-05-025), the Commission determined that Electric Service providers (ESPs) should be required to post financial security to protect against an involuntarily return of their residential and small business DA customers to bundled services due to their breach or failure and that for small business and residential customers only, the amount of security required to be posted must also include procurement costs based on the assumption that small business customers "may not possess the same business sophistication" to protect themselves in the event of breach by their ESP. See Decision ("D.") 11-12-018 Adopting Direct Access Reforms.

[4] *See* R.07-05-025, Joint Proposal of Southern California Edison Company, Pacific Gas and Electric Company and San Diego Gas & Electric Company at 7 (filed March 16, 2012) ("Joint IOU DA Proposal").

already set forth in the Joint IOU Proposal,[5] the revenues should be returned to all customers in proportion to direct AB 32 cap-and-trade program costs incurred by them. While the Joint IOUs prefer this interpretation of the term "small business" over others listed in the Ruling, it is still highly unfair to customers, difficult to administer, and subject to arbitrary distinctions and potential manipulation. As the ALJs note, electrical demand is not a perfect proxy for business size -- vulnerable small businesses with higher electrical usage may be excluded from any usage based threshold, while large businesses with many stores may be included. While SCE has 200 kW rate class divisions already, PG&E and SDG&E will need to make further modifications to their billing systems to identify, track, monitor, and provide allowance credits to just a segment of their business customers. The IOUs estimate that changes to their billing systems may be costly and may take months to implement.

In any case, given the shortness of time before implementation of AB 32 later this year, a reasonable amount of time after issuance of a final decision in this proceeding will also be necessary for implementation of both these billing changes and commensurate outreach to customers. An interim approach may be required, until full system implementation can be completed. Any interim approach – like the Joint IOU Proposal – should avoid the costs and complexities of a deferred revenue return to customers.

B. The Usage-Based Definitions Used in the Public Utilities Code and "Back-billing" Proceeding Are Too Narrow and Should Not Be Employed

Other usage-based definitions are simply too narrow, would exclude too many vulnerable California business entities (raising serious equity concerns addressed in the Joint IOU Proposal),[6] and would also create complicated billing and identification problems.

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[5] *See, generally,* Revised Joint IOU Proposal and Supplemental Information of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company on the Appropriate Use of Allowance Auction Revenues (filed January 6, 2012) ("Joint IOU Proposal").

[6] *See* Joint IOU Proposal at 11-12, Opening Comments at 12-15.

For example, in the "back-billing" proceeding, the Commission identified "small business" customer as having either (i) a demand of 20 kW or less during the previous calendar year, or (ii) an annual usage of 40,000 kWh or less during the previous calendar year. To sweep up any outliers of this demand/usage proxy, the Commission permitted a business to also qualify, via a self-certification process, as a micro-business under Section 14837 of the Government Code.[7] However, the "back-billing" proceeding, designed as a vehicle to identify and protect struggling small and micro-businesses[8] from the financial burden of a new backbill or deposit requirement, is distinguishable from the current proceeding because its intended beneficiaries were those who were "barely able to make ends meet"[9] and that may have otherwise been "forced to shut down and/or claim bankruptcy due to the high amount of back-billing by the utility."[10] The 200 kW is therefore more appropriate in this context, casting a wide enough net to sweep in most businesses typically considered small,[11] rather than just struggling micro-businesses. The Joint IOUs prefer the use of the DA threshold over the back-billing threshold.

The California Public Utilities Code employs a similarly narrow means of identifying "small commercial customers," i.e., those whose demands are below 20 kW.[12] However, in their tariff, SCE and SDG&E reasonably interpret the term "commercial" as excluding agricultural customers, whereas the term "business" is generally interpreted to encompass all non-residential customers.[13] Accordingly, the term "small commercial customer" used in the Public Utilities

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7 *See* D.10-10-032 at 1 note 1.

8 *Id.* at 1 (strictly limiting scope of review to "considering whether to treat small business customers, *as defined in Government Code Section 14837 under the definition of 'micro-business,'* the same as residential customers for specific billing and deposit purposes.").

9 R.10-05-005, Order Instituting Rulemaking to Consider Revising Energy Utility Tariff Rules Related to Deposits and Adjusting Bills As They Affect Small Business Customers, at 7 (May 6, 2010).

10 *Id.* at 5.

11 For example, SCE's GS-2 rate class (which covers demand of 20 - 200 kW, includes "small manufacturing and processing firms, retail businesses, churches, service stations, schools, and restaurants").

12 Publ. Util. Code § 331.

13 *See, e.g.,* Rule 1 of SCE's Tariff Book (Definitions of "Small Business Customer") which does not exclude agricultural customers.

Code is not directly applicable here and the Legislature's use of the term "business" rather than "commercial" should be interpreted to mean any non-residential customer.

C. Administrative Agency Definitions Are Unmanageable

Both the United States Small Business Administration ("SBA") and California Department of General Services ("DGS") definitions set forth in the Ruling would be unmanageable for the IOUs to implement. These definitions would require the IOUs to perform information-gathering and policing activities that are expensive and require particular knowledge and expertise. For example, determining whether a business is dominant in its field of operation would require details about the business's revenue stream, sales volume and more general information about other businesses within that field of operation. Other requirements, such as not exceeding a threshold number of employees or revenues,[14] being independently owned and operated, or having a principal office in California would also require significant inputs from customers and costly verification on the part of IOUs. These information-gathering and policing functions are not within the scope of the IOUs' expertise and would require extensive time and resources to establish the program. As well, it would require on-going verification and monitoring to prevent fraud, gaming and other abuses of the system. In addition, these definitions would still exclude important entities, such as larger businesses and agricultural customers, schools, hospitals, universities, other non-profit corporations, transit agencies, religious institutions and the public sector.

In sum, while a broad, usage-based definition of "small business" is more practicable, no definition of "small business" is broad enough to ensure that rate increases will not send some business customers packing or cause some electricity customers to recant their support for the cap-and-trade program altogether.

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[14] Revenue thresholds are particularly difficult for IOUs, because they are likely to require periodic updating to take into account inflation.

III.

EITE CUSTOMERS SHOULD BE DEFINED BROADLY TO INCLUDE ALL CUSTOMERS THAT COMPETE WITH OUT-OF-STATE ENTITIES

Notwithstanding the California Air Resources Board's ("ARB's") more narrow consideration of EITE retail customers,[15] the IOUs believe that the facts and evidence regarding California's non-residential, private-sector electric customers would demonstrates that most, if not all, such customers are competing with other entities that reside outside of California and therefore are "emissions-intensive, trade exposed" for purposes of SB 1018. Accordingly, EITE should be defined to represent the broad scope of California businesses, including all agriculture and manufacturing, as well as retail, services, and gas/oil/mining sectors that are subject to competition from surrounding states, nationally, or global markets.[16]

IV.

EACH IOU SHOULD ADMINISTER A REASONABLE AND LOW-COST PUBLIC OUTREACH PLAN CONSISTENT WITH SB 1018 AND THE JOINT IOU PROPOSAL

SB 1018's requirement that the Commission adopt and implement a customer outreach plan for making the public aware of "the crediting of greenhouse gas allowance revenues" is consistent with the principles for cost-effective and reasonable customer outreach provided in the Joint IOU Proposal.[17] These principles should be considered by the Commission in implementing the outreach required by SB 1018.

In particular, as discussed in response to the specific questions below, the Joint IOUs recommend that the Commission focus on "feasible," reasonable and cost-effective customer outreach that:

- Can be administered by each IOU,
- Provides consistent, objective information to customers,

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15 *See* 17 California Code of Regulation §95870, Table 8-1.

16 ARB has commissioned new studies of trade exposure and leakage from interstate competition due to increased energy prices. *See* Cap-and-Trade Technical Workshop to Discuss Emissions Leakage, July 30, 2012, available at: http://www.arb.ca.gov/cc/capandtrade/meetings/meetings.htm.

17 *See* Joint IOU Proposal, at 24- 27 (January 6, 2012), Opening Comments of Joint IOUs, at 21- 24 (January 31, 2012).

- Uses existing communications channels,
- Is tailored to the characteristics of the customers within each IOU's service area,
- Provides consistency with other customer communications on related programs, such as the renewable portfolio standard, energy efficiency and other AB 32 programs, and
- Takes into account whether the customers are receiving credits on their utility bills for GHG allowance revenues or not.

The Joint IOUs provide their responses to the outreach questions raised in the Ruling.

A. "Maximum Feasible Public Awareness" Is a Flexible Standard

The Joint IOUs recommend that the Commission interpret "maximum feasible public awareness" in SB 1018 in the same way as it generally interprets the "reasonableness" of utility expenditures to achieve a specific goal, i.e., by comparing the benefits of the goal with the expenditures needed to achieve that goal. For purposes of public awareness of crediting the GHG allowance revenues, the outreach should be focused on IOUs' customers and on modest and realistic efforts using low cost, existing outreach options, e.g., bill communications (inserts and onserts), website information, and use of customer call centers. The success of the customer outreach should be judged based on the level of customer exposure to public information regarding the crediting of GHG allowance revenues.

B. Outreach Costs Should be Minimized By Using Existing Channels and Recovered Through Allowance Revenues, Consistent with Public Utilities Code Section 454

The Joint IOUs recommend that existing delivery channels[18] be used and recommend against expensive, mass-media advertising at this early stage of AB 32 implementation. The Joint IOUs propose, preliminarily and based on the IOUs' outreach plan, that the budgets for the customer outreach for 2013[19] be a maximum of $1.7 million for PG&E, $1.4 million for SCE, and $750,000 for SDG&E, unless the Commission expands the scope of outreach required.[20]

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[18] *See* Opening Comments at 23 (listing existing channels).

[19] In general, these estimates include (1) bill inserts, online communications, and earned media; and (2) direct and one-to-one outreach to customers whose bills will be significantly, negatively affected by SB 1018 but do not include any mass media or multiple direct outreach to all customer.

[20] For example, outreach to all customers (rather than just those receiving a credit or significantly, negatively impacted customers) or outreach that uses mass media or direct mail will increase costs substantially.

These amounts should be updated annually in a tier 2 advice letter filing in this proceeding with recovery from allowance revenues. Specifically, the Joint IOUs recommend that the costs of the customer outreach program of each IOU be funded directly from AB 32 allowance revenues through each IOU's Energy Revenue Recovery Account ("ERRA") proceeding. Under Section 454 of the Public Utilities Code, the Commission has authority to approve changes in ratemaking that do not result in an increase in utility rates without a formal application. Because the AB 32 allowance revenues will reduce each IOU's rates for recovery of AB 32 compliance costs, the customer outreach program costs would be recovered without a net increase in rates. The Commission should review the reasonableness of each IOU's cost estimates and scope of outreach activities in this proceeding, and then issue a decision as soon as possible in this proceeding approving the outreach plan, authorizing each IOU to file an advice letter to implement the ratemaking to recover the costs in accordance with the Commission's decision and providing the utilities flexibility on the start date for their outreach efforts in 2013 in order accommodate any necessary billing system and outreach delivery requirements.

C. Each IOU Should Administer its Own Outreach Program While Collaborating With Other IOUs to Ensure Consistency and Coordination

The Joint IOUs recommend that the outreach plans be administered by the individual IOUs, subject to utility collaboration to ensure consistency and coordination. As the Joint IOUs have already argued in opening comments in this proceeding,[21] the IOUs are in a unique position to communicate changes in California's cap-and-trade policy to their customers. Furthermore, communications on the crediting of GHG allowance revenues need to be carefully crafted based on each IOU's individual service area in order to avoid customer confusion and coordinated with other IOUs' outreach efforts on similar topics. Ensuring consistency in messaging and appropriate timing with other IOU communications such as those related to energy efficiency,

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21 *See* Opening Comments at 23.

conservation, dynamic pricing and rate impacts will be a critical component of the SB 1018 outreach efforts.

V.
ABSENT PRIOR STATUTORY AUTHORIZATION, THE 15 PERCENT CAP AND LIMITATIONS ON USING REVENUES FOR PURPOSES OTHER THAN BILL RELIEF PRECLUDE CARVING OUT ANY MONEY FOR OTHER PURPOSES

SB 1018 provides a 15 percent cap on the amount and specific use of allowance revenues that may be used for purposes other than direct customer bill relief. Specifically, SB 1018 limits this carve out to "clean energy and energy efficiency projects" that are "established pursuant to statute," "administered by the electrical corporation," and "not otherwise funded by another funding source." The Joint IOUs are aware of no such existing IOU-run clean energy and efficiency projects that have not been otherwise funded. Accordingly, unless and until the Legislature acts to authorize the use of these funds for specific projects consistent with SB 1018, any carve-outs proposed by stakeholders in this proceeding should be rejected and the Commission should allocate 100 percent of the allowance revenues to customers (net of the costs for outreach mandated by SB 1018), as already recommended in the Joint IOU Proposal.

Respectfully submitted on behalf of the Joint IOUs,

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Appendix A
Small Business Customer Classification Information

Below, the Joint IOUs provide rough estimates of how many customer accounts and how much annual electricity usage would be captured under the definitions of small businesses discussed in this filing (*see Section II, starting page three)*. This information is neither meant to be binding nor represent any preference on the part of the Joint IOUs. The definitions compared are as follows:

- Definition A: Service accounts in rate classes generally smaller than 200 kW
- Definition B: Service accounts in rate classes generally 20 kW and smaller
- Definition C: Service accounts of businesses qualifying as "Small Businesses" under the US SBA definition

It is important to note that these definitions and the estimates included below are *not* based on peak demand thresholds. Rate classes at each IOU are roughly based on peak demand of a customer account but allow a certain number of deviations from this level to allow for variations in customer load. For example, SCE's GS-2 rate schedule is generally for accounts with usage below 200 kW, but customers may remain on this schedule even if their usage reaches or exceeds 200 kW twice in a rolling 12-month period. If the Commission were to define "small business" as all accounts with demand less than 200 kW, a large number of GS-2 accounts would actually not qualify (for comparison purposes, SCE includes some information on what customers and usage would be included under this more restrictive definition below).

SCE Small Business Customer Classification Scenario Analysis

Based on last 12 months system sales (July 2011- June 2012)

	Accounts		**Annual Usage (MWh)**	
	Total[1]	**%[2]**	**Total[1]**	**%[2]**
Definition A[3]	615,211	89.5%	20,706,843	37.4%
Definition B[3]	481,388	70.1%	4,925,714	8.9%
Definition C[4]	N/A	N/A	N/A	N/A

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[1] All PG&E data is for bundled customers only; SCE and SDG&E include DA customers and usage.

[2] Percentages are calculated as a portion of non-residential customers or usage (SCE and SDG&E use system customer and usage data, PG&E uses bundled customer and usage data only).

[3] As noted above, these totals are based on rate class estimations, which may deviate from specific demand threshold classifications. If Definition A was actually restricted to service accounts that never reached or exceed 200 kW, for example, SCE would only serve 436,108 "small business" customers (63.5% of total non-residential customers)

[4] IOUs do not track and cannot currently measure this information.

PG&E Small Business Customer Classification Scenario Analysis

Based on 2013 bundled sales forecast

	Accounts		Annual Usage (MWh)	
	Total[1]	%[2]	Total[1]	%[2]
Definition A[5]	557,755	87.2%	22,779,359	52.7%
Definition B[6]	493,963	77.2%	8,857,709	20.5%
Definition C[4]	N/A	N/A	N/A	N/A

SDG&E Small Business Customer Classification Scenario Analysis

Based on 2011 system sales

	Accounts		Annual Usage (MWh)	
	Total[1]	%[2]	Total[1]	%[2]
Definition A[3]	152,026	88.0%	5,212,436	43.0%
Definition B	133,653	77.0%	1,864,710	15.0%
Definition C[4]	N/A	N/A	N/A	N/A

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[5] Includes schedules A-1, A-6, AG-4A, AG-5A, AG-RA, and AG-VA.

[6] Includes schedules A-1, A-6, A-10 (est. >200 kW excluded), AG-4A, AG-5A, AG-RA, AG-VA, AG-4B, and AG-4C.