

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 15, 2012

Advice Letter 3278-G/4006-E

Mr. Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Subject: PG&E's Proposed Schedule for SmartMeter™ Opt-Out Program

Dear Mr. Cherry:

Energy Division has determined that Advice Letter 3278-G/4006-E is in compliance with Decision (D.) 12-02-014 (Decision). Energy Division approves the Advice Letter as filed on February 16, 2012, with an effective date of February 16, 2012.

Background

On February 16, 2012, PG&E filed a Tier 1 Advice Letter 3278-G/4006-E, with the same requested effective date, seeking approval of two new rate schedules that allow residential smart meter opt-out service in response to CPUC directive in D. 12-02-014.

On March 7, 2012, Mr. Edward Hasbrouck filed a protest to the Advice Letter disputing certain language in the SmartMeter™ Opt-Out Program tariff proposed by PG&E, as well as other issues relating to utility's authority relating to smart meter installations.

On March 14, 2012, PG&E submitted a reply to the protest, arguing for the rejection of the protest based on its assertions that its filing is directly compliant with CPUC order in D. 12-02-014 and the protest relating to its installation authority is outside the scope of the advice letter filing.

On March 19, 2012, Energy Division reviewed the matter and issued a disposition letter rejecting the protest and approving PG&E's Advice Letter.

On March 29, 2012, Energy Division withdrew without prejudice the March 19 disposition letter in light of procedural errors, specifically neither the March 14 PG&E reply to the protest, nor the March 19 disposition letter was properly served to Mr. Hasbrouck on a timely basis.

On April 5, 2012, the CPUC's Legal Division served a copy of the March 14 PG&E reply to the protest via a certified letter to Mr. Hasbrouck, and by that same letter confirmed and cured the procedural errors. Mr. Hasbrouck has now been provided a 10 day period to review the materials that were not previously served, and the Energy Division is able to review anew the Advice Letter.

Brian K. Cherry

May 15, 2012

Page 2

Disposition

Energy Division has again reviewed Advice Letter 3278-G/4006-E and concluded that it is in compliance with D. 12-02-014. Energy Division reviewed Mr. Hasbrouck protest of March 7 and has concluded that the protest was not based on proper grounds for protest of an Advice Letter (See General Order 96-B, Sections 7.6.1 and 7.4.2). The protest does not demonstrate that PG&E's actions would violate CPUC orders or satisfy other grounds for protests allowed by the General Order, therefore, PG&E's Advice Letter remains in effect as filed. Specifically, the protest does not demonstrate that the Advice Letter "is not authorized by [the] CPUC order on which the utility relies." (General Rule 7.4.2, subd. (2).) Further, the protest does not meet any of the other three grounds for protest that are cited in the protest. (that is, General Order 96-B, Rule 7.4.2, subd. 3, 5, and 6).

Mr. Hasbrouck's protest argues that the relief requested in the Advice Letter violates a CPUC order, or should have been spelled out in greater detail in the original order. In fact, the Decision explicitly directs PG&E to file the advice letter and include detailed procedures to implement an opt-out option for customers, including establishing communication procedures with respect to the opt-out program. PG&E's Advice Letter, including Attachment 2 to the Advice Letter, details the implementation details that the CPUC ordered the utility to provide therein.

In addition to not meeting the grounds for protest as discussed above, Mr. Hasbrouck's protest raises several issues that are outside the scope of the Advice Letter. D. 12-02-014 and prior decisions presume that PG&E will have access to replace traditional meters and/or smart meters. Mr. Hasbrouck's protest raises issues regarding physical access to meters, issues regarding determination of customer desire to use or not use a smart meter, and the potential for PG&E to allow third parties to use the smart meter mesh network facilities. All of these issues are outside the scope of this Advice Letter filing.

D. 12-02-014 is currently subject to an Application for Rehearing. The disposition of this Advice Letter does not in any way prejudice the issues pending before the CPUC in that rehearing, which will be resolved in a separate decision.

On March 28, Mr. Hasbrouck sent to the CPUC a Request for Review of our March 19 disposition letter. Nothing in this letter responds to that request for review since the original March 19 disposition letter was withdrawn without prejudice. As noted in Legal Division's letter on April 5, the protestor is free to re-file such a request during the period and in the manner allowed by the CPUC's General Order 96-B.

Sincerely,



Edward Randolph
Director, Energy Division
California Public Utilities Commission

cc: Mr. Edward Hasbrouck, via electronic mail edward@hasbrouck.org
Service List Application (A.)11-03-014, via electronic mail



Brian K. Cherry
Vice President
Regulation and Rates

Pacific Gas and Electric Company
77 Beale St., Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Fax: 415.973.6520

February 16, 2012

Advice 3278-G/4006-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Approval of Electric Rate Schedule E-SOP, Residential Electric SmartMeter™ Opt-Out Program, and Gas Rate Schedule G-SOP, Residential Gas SmartMeter™ Opt-Out Program, in Compliance with D.12-02-014

In accordance with Ordering Paragraph 2 of Decision 12-02-014, PG&E submits for approval its proposed gas and electric rate schedules to implement the SmartMeter™ Opt-Out Program. The affected tariff sheets are listed on the enclosed Attachment 1.

Purpose

Ordering Paragraph 2 of Decision 12-02-014 requires that within 15 days of the effective date of that decision, PG&E file a Tier 1 advice letter to submit tariffs necessary to implement an opt-out option for customers who do not wish to have a wireless SmartMeter™ installed at their location. On February 2, 2012, PG&E submitted its tariff to implement the Memorandum Accounts required by Ordering Paragraph 2d. In this advice letter, PG&E submits the remaining requirements pursuant to Ordering Paragraph 2 of Decision 12-02-014.

Background

Ordering Paragraph 2 of D.12-02-014 provides as follows:

Within 15 days of the effective date of this order, Pacific Gas and Electric Company (PG&E) shall file a Tier 1 advice letter in compliance with General Order 96-B. The advice letter shall be served on the service list in Application 11-03-014. The advice letter shall include tariff sheets to modify PG&E's SmartMeter Program to include an opt-out option for customers who do not wish to have a wireless SmartMeter installed at their location and to implement a SmartMeter Opt-Out Tariff. The Advice Letter filing shall:

- a. Establish procedures for residential customers to select the option to have an analog meter if they do not wish to have a wireless SmartMeter.
- b. Establish procedures to inform customers that a SmartMeter opt-out option is available. A customer currently on the delay list shall be informed that the customer will be scheduled to receive a wireless SmartMeter unless the customer elects to exercise the opt-out option.
- c. Adopt the following interim fees for residential customers selecting the opt-out option:

For Non-CARE and Non-FERA Customers:

Initial Fee \$75.00
Monthly Charge \$10.00/month

For CARE and FERA Customers:

Initial Fee \$10.00
Monthly Charge \$5.00/month

- d. Establish new two-way electric and gas Modified SmartMeter Memorandum Accounts to track revenues and costs associated with providing the SmartMeter opt-out option.

On February 2, 2012, PG&E filed Tier 1 Advice Letter 3275-G/4002-E implementing the memorandum accounts required by part d. PG&E submits the remaining requirements of Ordering Paragraph 2 in this Advice Letter within 15 days of the effective date of D.12-02-014, as ordered.

Filing Requirements

Attachment 2 to this advice letter provides procedures requested in Ordering Paragraph 2, parts a and b. Specifically, part a requires PG&E to establish procedures for residential customers to select the option to have an analog meter if they do not wish to have a wireless SmartMeter™. Part b requires PG&E to establish procedures to inform customers currently on the delay list that a SmartMeter™ opt-out option is available and that the customer will be scheduled to receive a wireless SmartMeter™ unless the customer elects to exercise the opt-out option.

Finally, as noted above gas and electric tariffs implementing the charges approved by the Commission are provided as Attachment 1.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than March 7, 2012, which is 20 days after the date of this filing. Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch

505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: anj@cpuc.ca.gov and mas@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
E-mail: PGETariffs@pge.com

Effective Date

PG&E requests that this advice filing become effective on February 16, 2012.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for Application 11-03-014. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to

PGETariffs@pge.com. Advice letter filings can also be accessed electronically at:
<http://www.pge.com/tariffs>.

A handwritten signature in blue ink that reads "Brian Cherry". To the right of the signature is a small circular stamp containing the initials "B.C."

Vice President, Regulation and Rates

Attachments

cc: Service List A. 11-03-014

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 M)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Britta Brown

Phone #: (415) 973-8584

E-mail: B2Bn@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3278-G/4006-E**

Tier: 1

Subject of AL: **Approval of Electric Rate Schedule E-SOP, Residential Electric SmartMeter™ Opt-Out Program, and Gas Rate Schedule G-SOP, Residential Gas SmartMeter™ Opt-Out Program, in Compliance with D.12-02-014**

Keywords (choose from CPUC listing): **Compliance, Metering**

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: **D.12-02-014**

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: **2/16/12**

No. of tariff sheets: **8**

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: **E-SOP, G-SOP**

Service affected and changes proposed: **Residential Electric SmartMeter™ Opt-Out Program**

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Tariff Files, Room 4005

DMS Branch

505 Van Ness Ave., San Francisco, CA 94102

jjn@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian K. Cherry, Vice President, Regulation and Rates

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

**ATTACHMENT 1
Advice 3278-G**

**Cal P.U.C.
Sheet No.**

Title of Sheet

**Cancelling Cal
P.U.C. Sheet No.**

29534-G GAS SCHEDULE G-SOP
RESIDENTIAL GAS SMARTMETER™ OPT-OUT
PROGRAM
Sheet 1

29535-G GAS SCHEDULE G-SOP
RESIDENTIAL GAS SMARTMETER™ OPT-OUT
PROGRAM
Sheet 2

29536-G GAS TABLE OF CONTENTS
Sheet 1

29523-G

29537-G GAS TABLE OF CONTENTS
Sheet 3

29492-G



GAS SCHEDULE G-SOP
RESIDENTIAL GAS SMARTMETER(TM) OPT-OUT PROGRAM

Sheet 1 (N)
 (N)

1. **APPLICABILITY:** This program is available to all residential customers who do not wish to have a wireless, communicating meter, known as a SmartMeter™, installed at their premises (hereafter, "Opt-Out Customers"). Under this program, customers may receive service using an analog meter. This schedule is applicable to customers that take gas-only service from PG&E. Customers who take both gas and electric service, or electric-only service, from PG&E and wish to have analog meters used for service should refer to Schedule E-SOP for terms and conditions of service.

(N)

2. **TERRITORY:** This schedule applies everywhere that PG&E provides gas service.

3. **RATES:** Customers who elect this option will be charged as follows:

Customers who take service on the California Alternate Rates for Energy (CARE) program will pay an initial amount and a monthly charge. The initial amount is \$10 for this service. In addition, these customers will pay \$5 per month for analog meter service.

Customers who are not taking service on the CARE program will pay an initial amount and a monthly charge. The initial amount is \$75 for this service. In addition, these customers will pay \$10 per month for analog meter service.

The initial and monthly charges described above are applicable to customers who receive only gas service from PG&E. Customers who take both gas and electric service from PG&E, and wish to have an analog gas meter installed, should refer to Schedule E-SOP, the Residential Electric SmartMeter™ Opt-Out Program, for the associated charges.

Customers will not be charged the initial amount or monthly charge until the analog meter is installed.

(N)

(Continued)



GAS SCHEDULE G-SOP
RESIDENTIAL GAS SMARTMETER(TM) OPT-OUT PROGRAM

Sheet 2 (N)
 (N)

4. **METERING EQUIPMENT:** At PG&E's discretion, the SmartMeter™-module will be removed from the gas meter, or the gas meter will be exchanged for an analog gas meter, at premises where PG&E provides gas service. (N)
5. **BILLING:** Customers will be billed for charges applicable under the customer's Otherwise Applicable Rate Schedule (OAS), plus the initial amount and monthly charge described herein. (N)
- The initial amount and monthly charge will appear on a customer's electric service agreement when the customer takes both gas and electric service from PG&E. The initial amount and monthly charge will appear on the customer's gas service agreement if the customer takes only gas service from PG&E under this Schedule.
- Opt-Out Program customers will be charged the initial and monthly charges described above once the analog meter(s) is installed, and they will be required to pay the initial amount within 90 days. All such charges will be subject to the terms and conditions for rendering and payment of bills under Gas Rules 8 and 9.
- Pursuant to Decision 12-02-014, a customer must affirmatively elect to opt-out of the SmartMeter™ Program, and shall default to SmartMeter™-based utility service absent such an election. If PG&E makes a field visit to a customer's residence for purposes of installing a SmartMeter™ and the customer does not provide reasonable access to PG&E to install a SmartMeter™ after being provided notice of eligibility for service under this Opt-Out Program and not electing to opt-out, the customer shall be deemed to have elected service under this Opt-Out Program. (N)



GAS TABLE OF CONTENTS

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page	29536-G	(T)
Rate Schedules	29568, 29537-G	(T)
Preliminary Statements.....	29517, 29341-G	
Rules	29287-G	
Maps, Contracts and Deviations.....	29288-G	
Sample Forms	29289, 28995, 27262, 28662, 29290*, 28503-G	

(Continued)

Advice Letter No: 3278-G
 Decision No. 12-02-014

Issued by
Brian K. Cherry
 Vice President
 Regulation and Rates

Date Filed February 16, 2012
 Effective February 16, 2012
 Resolution No. _____



GAS TABLE OF CONTENTS

Sheet 3

SCHEDULE TITLE OF SHEET CAL P.U.C. SHEET NO.

**Rate Schedules
 Non-Residential**

G-AFTOFF	Annual Firm Transportation Off-System	24466,29464,22057-G
G-SFT	Seasonal Firm Transportation On-System Only	24467,29479,22178-G
G-AA	As-Available Transportation On-System	24468,29461-G
G-AAOFF	As-Available Transportation Off-System	24469,29462-G
G-NFT	Negotiated Firm Transportation On-System	24470,22909-22910-G
G-NFTOFF	Negotiated Firm Transportation Off-System	24471,19294,21836-G
G-NAA	Negotiated As-Available Transportation On-System	24472,22911,22184-G
G-NAAOFF	Negotiated As-Available Transportation Off-System	24473,22912-22913-G
G-OEC	Gas Delivery To Off-System End-Use Customers	22263-22264-G
G-CARE	CARE Program Service for Qualified Nonprofit Group Living and Qualified Agricultural Employee Housing Facilities.....	23367-G
G-XF	Pipeline Expansion Firm Intrastate Transportation Service	29481, 29482, 27966-27965-G
G-PARK	Market Center Parking Service	29477,18177-G

**Rate Schedules
 Other**

G-LEND	Market Center Lending Service	29468,18179-G
G-CT	Core Gas Aggregation Service	29430,21740,25112,21741,20052,28395, 29142-29151-G
G-CRED	Billing Credits for CTA-Consolidated Billing	20063-G
G-SUR	Customer-Procured Gas Franchise Fee Surcharge	29490-G
G-PPPS	Gas Public Purpose Program Surcharge.....	29343*,23704-G
G-ESP	Consolidated Pacific Gas and Electric Company Billing Services to Core Transport Agents	21739-G
G-WGSP	Winter Gas Savings Program	29104,29105,29106-G
G-OBF	On-Bill Financing Loan Program.....	28306, 28307, 28308-G
G-SOP	Residential Gas SmartMeter™ Opt-Out Program.....	29534, 29535-G

(N)

**Rate Schedules
 Experimental**

G-NGV1	Experimental Natural Gas Service for Compression on Customers Premises.....	29431,27653-G
G-NGV2	Experimental Compressed Natural Gas Service	29432,27655-G
G-NGV4	Experimental Gas Transportation Service to Noncore Natural Gas Vehicles	29473, 29474,27658-G
G-LNG	Experimental Liquefied Natural Gas Service	29469,21890-G

(Continued)

**Cal P.U.C.
Sheet No.**

Title of Sheet

**Cancelling Cal
P.U.C. Sheet No.**

31330-E ELECTRIC SCHEDULE E-SOP
RESIDENTIAL ELECTRIC SMARTMETERTM
OPT-OUT PROGRAM
Sheet 1

31331-E ELECTRIC SCHEDULE E-SOP
RESIDENTIAL ELECTRIC SMARTMETERTM
OPT-OUT PROGRAM
Sheet 2

31332-E ELECTRIC TABLE OF CONTENTS
Sheet 1

31315-E

31333-E ELECTRIC TABLE OF CONTENTS
RATE SCHEDULES
Sheet 6

31241*-E



ELECTRIC SCHEDULE E-SOP
RESIDENTIAL ELECTRIC SMARTMETER(TM) OPT-OUT PROGRAM

Sheet 1 (N)
 (N)

1. **APPLICABILITY:** This program is available to all residential customers who do not wish to have a wireless, communicating meter, known as a SmartMeter™, installed at their premises (hereafter, "Opt-Out Customers"). Under this program, customers may receive service using an analog meter(s). Customers taking service under Schedule E-RSMART, Residential SmartRate™, are not eligible for this program. This schedule is applicable to customers who take gas and electric service, or electric-only service, from PG&E.

(N)

2. **TERRITORY:** This schedule applies everywhere that PG&E provides electric and gas service.

3. **RATES:** Customers who elect this option will be charged as follows:

Customers who take service on either the California Alternate Rates for Energy (CARE) or Family Electric Rate Assistance (FERA) programs will pay an initial amount and a monthly charge. The initial amount is \$10 for this service. In addition, these customers will pay \$5 per month for analog meter service.

Customers who are not taking service on CARE or FERA programs will pay an initial amount and a monthly charge. The initial amount is \$75 for this service. In addition, these customers will pay \$10 per month for analog meter service.

The initial and monthly charges described above are applicable to customers who receive gas and electric service, or receive electric-only service, from PG&E. Customers that take only gas service from PG&E, and wish to have an analog gas meter installed, should refer to Schedule G-SOP, the Residential Gas SmartMeter™ Opt-Out Program, for the associated charges.

Customers will not be charged the initial amount or monthly charge until the analog meter(s) is installed.

(N)

(Continued)



ELECTRIC SCHEDULE E-SOP
RESIDENTIAL ELECTRIC SMARTMETER(TM) OPT-OUT PROGRAM

Sheet 2 (N)
 (N)

4. **METERING EQUIPMENT:** A non-communicating meter will be used to provide electric service for customers who elect this option. For the great majority of customers, these meters will be analog meters. For a very small number of residential electric customers that require special meters, these meters will be non-communicating solid-state digital meters. (N)

For example, analog meters are not available to support electric time-of-use service, such that analog meters may not be used for electric service under time-of-use rate schedules, including Schedules EM-TOU, EML-TOU, E-6, EL-6, E-7, EA-7, EL-7, E-A7, EL-A7 and E-9. Customers served under time-of-use rate schedules may elect to have an analog non-communicating meter installed and take service under any non-time-of-use schedule for which they are eligible, such as Schedule E-1, or, alternatively, may remain on their current time-of-use rate schedule and choose to elect service under this Opt-Out Program using a non-communicating solid state digital time-of-use meter.

5. **BILLING:** Customers will be billed for charges applicable under the customer's Otherwise Applicable Rate Schedule (OAS), plus the initial amount and the monthly charge described herein. The initial amount and monthly charge will appear on the electric service agreements of both customers that take electric-only service from PG&E and customers that take gas and electric service from PG&E. Opt-Out Program customers will be charged the initial and monthly charges described above once the replacement meter(s) is installed, and they will be required to pay the initial amount within 90 days. All such charges will be subject to the terms and conditions for rendering and payment of bills under Electric Rules 8 and 9. (N)

Pursuant to Decision 12-02-014, a customer must affirmatively elect to opt-out of the SmartMeter™ Program, and shall default to SmartMeter™-based utility service absent such an election. If PG&E makes a field visit to a customer's residence for purposes of installing a SmartMeter™ and the customer does not provide reasonable access to PG&E to install a SmartMeter™ after being provided notice of eligibility for service under this Opt-Out Program and not electing to opt-out, the customer shall be deemed to have elected service under this Opt-Out Program. (N)



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
	Title Page	31332-E	(T)
	Rate Schedules	31131,31132,30764,31134 , 31333 ,31136,30751, 29897, 31137-E	(T)
	Preliminary Statements	31138,29900,30376,30844,31139,30846,31316-E	
	Rules	30402, 30473, 31153-E	
	Maps, Contracts and Deviations.....	29909-E	
	Sample Forms	30680*,30353,30372,31154,30354,30740,30513,30682,30833,30683,29920,29921-E	

(Continued)

Advice Letter No: 4006-E
 Decision No. 12-02-014

Issued by
Brian K. Cherry
 Vice President
 Regulation and Rates

Date Filed February 16, 2012
 Effective February 16, 2012
 Resolution No. _____



ELECTRIC TABLE OF CONTENTS
RATE SCHEDULES

Sheet 6

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
	Rate Schedules Other	
S	Standby Service	28399,28400, 31124,31125,28238-28243, 31126, 28245, 30291, 31233*,28401-28404-E
E-CHP	Combined Heat and Power PPA.....	30809-30813-E
E-CHPS	Combined Heat and Power Simplified PPA.....	30814-30817-E
E-CHPSA	Combined Heat And Power Simplified 500 kW PPA.....	30825-30828-E
E-DCG	DCG Departing Customer Generation, CG	30168*,30169*,23667, 30697,30698,28954,28607,23252,23253,28405,23255-E
E-DEPART	Departing Customers	28859-E
E-NWDL	New WAPA Departing Load	28581,28582,28862,28863,27448-27452-E
E-NMDL	New Municipal Departing Load... ..	27453,28955,28956,28957, 28958,28959,26704, 26705, 26706,26707,26708-E
E-LORMS	Limited Optional Remote Metering Services	20194-E
E-SDL	Split-Wheeling Departing Load.....	28588,28589,28867,28868,27459-27464-E
E-TMDL	Transferred Municipal Departing Load	27465,28869,28870, 25883,28961,28594,28608,25887,25888,25889,25890,25891-E
NEM	Net Energy Metering Service.....	30728,28573,27237, 30659,27241,27242,27243,30729,29691,27245, 27246,26128,26129,27247, 30490,30491,30492,30730-E
NEMFC	Net Energy Metering Service For Fuel Cell Customer-Generators.....	28566,28567, 27250,27251,26134,26135,26136,27252-E
NEMBIO	Net Energy Metering Service for Biogas Customer-Generators	27253-27255, 26140,27256,26142,27257,26144,27258-E
NEMCCSF	Net Energy Metering Service for City and County of San Francisco	28176,28177, 28178,28179-E
NEMVMASH	Net Energy Metering – Virtual Net Energy Metering.....	30514–30522,30731-30736-E
E-ERA	Energy Rate Adjustments.....	31058-31061-E
RES-BCT	Schedule for Local Government Renewable Energy Self-Generation Bill Credit Transfer.....	30752,30753,29208-29213,30754-E
E-OBF	On-Bill Financing Balance Account (OBFA).....	29490-29492-E
E-SOP	Residential Electric SmartMeter™ Opt-Out Program.....	31330, 31331-E (N)

(Continued)

**Electric Rate Schedule E-SOP
Residential Electric SmartMeter™ Opt-Out Program, and
Gas Rate Schedule G-SOP
Residential Gas SmartMeter™ Opt-Out Program**

**ATTACHMENT 2
SmartMeter™ Opt-Out Program Procedures**

Purpose: Ordering Paragraph 2 of Decision (D.) 12-02-014 requires Pacific Gas and Electric Company (PG&E) to include certain procedures needed to implement the SmartMeter™ Opt-Out Program in the Tier 1 Advice Letter implementing the SmartMeter™ Opt-Out Tariff (SOP).

Specifically, part (a) of Ordering Paragraph 2 of D.12-02-014 requires PG&E to establish procedures for residential customers to select an analog meter option if they do not wish to have a wireless SmartMeter™. Part (b) of Ordering Paragraph 2 requires PG&E to establish procedures to inform customers that a SmartMeter™ opt-out option is available and to inform customers currently on the Delay List that the customer will be scheduled to receive a wireless SmartMeter™ unless the customer elects to exercise the opt-out option.

This Attachment 2 complies with Ordering Paragraph 2 and provides those procedures.

Attachment 2 also provides the procedures that PG&E will employ to install the non-SmartMeter™ once a customer elects to exercise the opt-out option.

Procedure for Residential Customers to Select the Opt-Out Option

PG&E has established the five following methods for residential customers to opt-out of the SmartMeter™ Program if they do not wish to have a wireless SmartMeter™:

- 1. Live Phone Call with SmartMeter™ Representative.** PG&E has a dedicated SmartMeter™ phone line (1-866-743-0263) and has staffed the line with Customer Service Representatives (CSRs) trained to explain the SmartMeter™ Opt-Out Program to allow residential customers to enroll via a live phone call.
- 2. Interactive Voice Recording (IVR) Automated Enrollment.** PG&E has created new IVR functionality on its dedicated SmartMeter™ phone line (1-866-743-0263) to allow residential customers to enroll in the SmartMeter™ Opt-Out Program by pressing buttons on their touch-tone telephone. This automated system prompts residential customers to record their information, which is then routed for processing.
- 3. Web Form Enrollment.** PG&E has created a link on its external website at www.pge.com/SmartMeterOptOut to allow residential customers to access a web form to enroll in the SmartMeter™ Opt-Out Program. This web form, which requires the residential customer to provide his/her name, service address, and phone number, with

optional email and account number, is routed via email to PG&E for processing. The site also provides detailed information on the SmartMeter™ Opt-Out Program terms, including associated charges.

4. Local Office Visit. Residential customers can walk into a local PG&E office to enroll. PG&E has trained the personnel in its Local Offices to explain the SmartMeter™ Opt-Out Program to allow residential customers to enroll in the Office.

5. Form with Pre-Paid Postage Return Envelope. Decision 12-02-014 requires PG&E to notify residential customers currently on the Delay List individually by certified mail that the SmartMeter™ Opt-Out Program is available to them. As explained below, PG&E is sending a form in the certified letter that the residential customer can complete and mail to PG&E with their choice of participating either in the SmartMeter™ Opt-Out Program or the SmartMeter™ Program. For the residential customer's convenience, the certified letter also includes a pre-paid postage return envelope to mail the form back to PG&E.

Procedure to Inform Residential Customers that the Opt-Out Option Is Available

PG&E is using the following methods to inform residential customers that they have the option to opt-out of the SmartMeter™ Program if they do not wish to have a wireless SmartMeter™:

- Posting information on PG&E's external web, PGE.com, about the SmartMeter™ Opt-Out Program and how residential customers can enroll, including a new page dedicated to the Program.
- Establishing new in-queue telephone messages with information about the Program for residential customers calling PG&E.
- Developing and distributing a one-page hand-out with Program information, for use at the counters in Local Offices and for Field employees approached by residential customers.
- Sending certified letters with postage-paid return envelopes to residential customers who (1) formally requested that PG&E add them to the Delay List that PG&E initiated in April 2011; (2) affirmatively refused PG&E's attempt to install a SmartMeter™; (3) notified PG&E that they intended to remove their SmartMeter™ upon installation; (4) failed to provide PG&E with access to their residences (e.g., locked gate, unleashed dog) to allow PG&E to install a SmartMeter™ despite multiple PG&E-attempts to do so; (5) called PG&E to request that the existing SmartMeter™ be removed; or (6) removed their SmartMeter™ on their own (collectively, the Extended Delay List).
- Sending IVR messages to residential customers on the Extended Delay List to alert them of the program and that the certified letter would be sent to them.

PG&E also will add a reference to the SmartMeter™ Opt-Out Program in its standard SmartMeter™ installation letter for customers in those areas where deployment is still

underway, which will describe the opt-out alternative and provide residential customers with information on how to enroll.

Beginning in late February, PG&E will include a bill insert describing the SmartMeter™ Opt-Out Program in the March 2012 bills for all residential customers.

Procedure to Inform Delay List Residential Customers that the Opt-Out Option Is Available

As noted above, Decision 12-02-014 requires PG&E to notify residential customers currently on the Delay List individually by certified mail that the SmartMeter™ Opt-Out Program is available to them. This process must be complete within 20 days of the issuance of Decision 12-02-014.

PG&E is sending certified letters to these residential customers. The letter is accompanied by a form that the residential customer can complete and mail to PG&E with their choice of participating either in the SmartMeter™ Opt-Out Program or the SmartMeter™ Program. For the residential customer's convenience, the certified letter also includes a pre-paid postage return envelope to mail the form back to PG&E.

PG&E is establishing procedures to allow timely, electronic reports and information regarding the status of each letter, including delivery attempts, signature receipt, recipient rejection, and/or return-to-sender as part of its due diligence in reaching these residential customers.

Procedure to Install Analog Meter(s) for Opt-Out Program Residential Customers

Pursuant to Decision 12-02-014, a customer must affirmatively elect to opt-out of the SmartMeter™ Program, and shall default to SmartMeter™-based utility service absent such an election. If PG&E makes a field visit to a customer's residence for purposes of installing a SmartMeter™ and the customer does not provide reasonable access to PG&E to install a SmartMeter™ after being provided notice of eligibility for service under this Opt-Out Program and not electing to opt-out, the customer shall be deemed to have elected service under this Opt-Out Program.

**PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV**

AT&T	Dept of General Services	North Coast SolarResources
Alcantar & Kahl LLP	Douglass & Liddell	Occidental Energy Marketing, Inc.
Ameresco	Downey & Brand	OnGrid Solar
Anderson & Poole	Duke Energy	Praxair
BART	Economic Sciences Corporation	R. W. Beck & Associates
Barkovich & Yap, Inc.	Ellison Schneider & Harris LLP	RCS, Inc.
Bartle Wells Associates	Foster Farms	Recurrent Energy
Bloomberg	G. A. Krause & Assoc.	SCD Energy Solutions
Bloomberg New Energy Finance	GLJ Publications	SCE
Boston Properties	GenOn Energy, Inc.	SMUD
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SPURR
Brookfield Renewable Power	Green Power Institute	San Francisco Public Utilities Commission
CA Bldg Industry Association	Hanna & Morton	Seattle City Light
CLECA Law Office	Hitachi	Sempra Utilities
CSC Energy Services	In House Energy	Sierra Pacific Power Company
California Cotton Ginners & Growers Assn	International Power Technology	Silicon Valley Power
California Energy Commission	Intestate Gas Services, Inc.	Silo Energy LLC
California League of Food Processors	Lawrence Berkeley National Lab	Southern California Edison Company
California Public Utilities Commission	Los Angeles Dept of Water & Power	Spark Energy, L.P.
Calpine	Luce, Forward, Hamilton & Scripps LLP	Sun Light & Power
Casner, Steve	MAC Lighting Consulting	Sunshine Design
Center for Biological Diversity	MBMC, Inc.	Sutherland, Asbill & Brennan
Chris, King	MRW & Associates	Tabors Caramanis & Associates
City of Palo Alto	Manatt Phelps Phillips	Tecogen, Inc.
City of Palo Alto Utilities	McKenzie & Associates	Tiger Natural Gas, Inc.
City of San Jose	Merced Irrigation District	TransCanada
City of Santa Rosa	Modesto Irrigation District	Turlock Irrigation District
Clean Energy Fuels	Morgan Stanley	United Cogen
Coast Economic Consulting	Morrison & Foerster	Utility Cost Management
Commercial Energy	Morrison & Foerster LLP	Utility Specialists
Consumer Federation of California	NLine Energy, Inc.	Verizon
Crossborder Energy	NRG West	Wellhead Electric Company
Davis Wright Tremaine LLP	NaturEner	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	Navigant Consulting	eMeter Corporation
Defense Energy Support Center	Norris & Wong Associates	
Department of Water Resources	North America Power Partners	