

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

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September 27, 2007

Advice Letter 3109-E

Brian K. Cherry  
Director, Regulatory Relations  
Mail Code B10C  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177

Subject: October 2007 RA Compliance Filings

Dear Mr. Cherry:

Advice Letter 3109-E is effective August 31<sup>st</sup>, 2007. Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "S. H. Gallagher".

Sean H. Gallagher  
Director  
Energy Division



August 31, 2007

**Advice 3109-E**

(Pacific Gas and Electric Company ID U 39 E)

**Subject: Monthly Resource Adequacy (RA) Filing for Compliance-Month  
October 2007 Submitted Pursuant to Decision 05-10-042, Opinion  
on RA Requirements**

Public Utilities Commission of the State of California

Pacific Gas and Electric Company (PG&E) hereby submits this Advice Letter in compliance with *Decision (D.) 05-10-042, Opinion on Resource Adequacy Requirements* (Decision). PG&E's Resource Adequacy (RA) Filing for compliance month October 2007 is included in Confidential Attachment 3; the signed Certification is included in Attachment 1. In addition, the required California Public Utilities Commission (CPUC) confidentiality declaration for this compliance filing is included as Attachment 2.

**The information provided in Attachment 3 is commercially sensitive and confidential protected material and it is being submitted subject to the protections of Section 583 of the California Public Utilities Code and pursuant to the "Second Revised Protective Order Regarding Confidentiality of Market Sensitive Load and Resource Data and Information" that ALJ Wetzell issued in his February 1, 2007, ruling and the California Energy Commission's (CEC) agreement to adhere to that protective order, which the CEC signed on February 14, 2006; and D. 06-06-066, which established Confidentiality standards.**

**Purpose**

The purpose of this Advice Letter compliance filing is to demonstrate that PG&E has acquired sufficient resources to satisfy its 100% commitment obligation for loads plus reserve requirements for October 2007, pursuant to the Decision and subsequent CPUC guidelines.<sup>1</sup>

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<sup>1</sup> The CPUC's Energy Division (ED) hosted a Monthly RAR Compliance Showing workshop on March 7, 2006. Subsequently, the ED issued written guidance and a template for the RA Reporting Workbook on March 29, 2006.

This advice letter contains:

**Attachment 1:** *Certification Form of Roy Kuga*

**Attachment 2:** *Declaration of Vincent Loh supporting the confidentiality claims made in this filing.*

**Confidential Attachment 3:** *RA Reporting Workbook for October 2007.*

The Resource Adequacy Workbook contains commercially sensitive information indicating that PG&E has contracts for sufficient capacity to meet its Resource Adequacy Requirement.

Attachments 2 and 3 are also included in an attached CD containing the Excel file with each workbook.

### **Background**

As specified in D.05-10-042, Section 8.5 and Finding of Fact 43, the month-ahead compliance filing should be submitted on the last day of the second month prior to the compliance month.

On March 29, 2006, the Energy Division (ED) issued a letter entitled "Guidance to all Load-Serving Entities (LSEs) Regarding the Upcoming Monthly Resource Adequacy Requirement Compliance Filings, required by D.05-10-042 in R.04-04-003," including a Monthly Resource Adequacy (RA) Guide and the Monthly Reporting Template Spreadsheet and Instructions. This Advice Letter has been prepared in accordance with the Monthly RA Guide and the Monthly Reporting Template Spreadsheet and Instructions. Furthermore, PG&E incorporate updates since the March 29, 2006 document based on requirements stipulated by the two RA decisions adopted in the summer of 2006,<sup>2</sup> guidelines set forth by the document titled "2007 Filing Guide for System and Local Resource Adequacy (RA) Compliance Filings,"<sup>3</sup> and the e-mail notice provided by the Energy Division on November 28, 2006. Lastly, PG&E used the CAISO's Net Qualifying Capacity Values for Calendar Year 2007- Updated as of January 29, 2007 (<http://www.caiso.com/1833/1833e95e5f760.xls>) as the basis for this filing.

This Advice Letter does not request an increase of any rate or charge, or the withdrawal of service, nor does it conflict with any other schedule or rule.

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<sup>2</sup> Decision (D). 06-06-064, dated June 29, 2006 and D. 06-07-031, dated July 20, 2006.

<sup>3</sup> The CPUC's Energy Division released a draft 2007 RA (System and Local) filing guide on July 18, 2006. This guide was updated and released in final form on August 10, 2006.

**Protests**

In compliance with directives provided through the Energy Division's Monthly RA Guide, dated March 29, 2006, this advice filing is not subject to protests.

**Effective Date**

PG&E requests that this advice filing be approved effective the date of filing, **August 31, 2007**, pursuant to instruction from the CPUC's Energy Division. Per the March 29, 2006, Energy Division Guidance, RA compliance filings do not require a resolution.

**Notice**

In accordance with direction from the CPUC's Energy Division, service of this filing is only provided to the CPUC, California Energy Commission (CEC), and California Independent System Operator (CAISO).

Send all electronic approval letters to **PG&ETariffs@pge.com**.

A public version of this advice letter filing can also be accessed electronically at:

**<http://www.pge.com/tariffs>**

Handwritten signature of Brian K. Cherry in black ink.

Vice President, Regulatory Relations

Attachments

cc: California Energy Commission  
California Independent System Operator

# 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: Michelle Brown

Phone #: (415) 973-4662

E-mail: mtt3@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) #: **3109-E**

**Tier: 2**

Subject of AL: Monthly Resource Adequacy (RA) Filing for Compliance-Month October 2007 Submitted Pursuant to Decision 05-10-042, Opinion on RA Requirements

Keywords (choose from CPUC listing): Monthly RA

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.05-10-042

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<sup>1</sup>: \_\_\_\_\_

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:  Yes  No

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: August 31, 2007

No. of tariff sheets: 0

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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

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 Avenue**

**San Francisco, CA 94102**

**E-mail: [jjj@cpuc.ca.gov](mailto:jjj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)**

**Pacific Gas and Electric Company**

**Attn: Brian K. Cherry**

**Vice President, Regulatory Relations**

**77 Beale Street, Mail Code B10C**

**P.O. Box 770000**

**San Francisco, CA 94177**

**E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)**

**Worksheet A. CERTIFICATION FORM**

Name of Load Serving Entity (LSE):	PG&E
Energy Service Provider Registration Number (if applicable):	
Scheduling Coordinator:	PCG2
Month of Filing (June 2006, July 2006, August 2006, or September 2006):	October 2007

**Certification of Information:**

Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, this resource adequacy compliance filing has been verified by an officer of the corporation, who shall expressly certify, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this filing;
2. I have reviewed this compliance filing;
3. Based on my knowledge, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, this [filing] contains all of the information required to be provided by CPUC orders, rules, and regulations.

Certified By Authorized LSE Representative (Name):	Roy Kuga
Title:	Vice President - Energy Supply
Date:	8/30/2007
	
Signature (sign the hard copy of filing):	

**Contact Person for Questions about this Filing:**

Name:	Vincent Loh
Title:	Principal - Short Term Strategy
Email:	vk12@pge.com
Telephone:	415-972-5664
Address:	245 Market St., 1314B
Address 2:	
City:	San Francisco
State:	CA
Zip:	94105

**Back-Up Contact Person for Questions about this Filing (Optional):**

Name:	
Title:	
Email:	
Telephone:	