

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



December 13, 2013

**Advice Letters:**

**3632-E**

**3632-E-A**

**3632-E-B**

**3632-E-C**

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

**SUBJECT: Contracts for the Procurement of Renewable Energy Resources Resulting  
from Wind Energy Purchase Agreement with Barclays Bank PLC**

Dear Mr. Cherry,

Advice Letters 3632-E, E-A, E-B, and E-C are effective as of November 14, 2013.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director  
Energy Division



**Jane K. Yura**  
Vice President  
Regulation and Rates

*Mailing Address*  
Mail Code B10B  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415.973.6520

February 9, 2011

**Advice 3632-E-B**

(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental Filing for the Contracts for Procurement of Renewable Resources Energy Resulting From Power Purchase Agreements Between Barclays Bank PLC and Pacific Gas and Electric Company**

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) a supplemental filing for Advice Letter 3632-E, dated March 12, 2010, as supplemented by Advice Letter 3632-E-A, dated October 29, 2010, (collectively, the “Advice Letter”).<sup>1</sup> In the Advice Letter, PG&E submitted an amended and restated confirmation letter, which supplements and modifies an existing Edison Electric Institute (“EEI”) Master Power Purchase and Sale Agreement, as amended, between PG&E and Barclays Bank PLC (“Barclays”) (collectively, the “Agreement”). As stated in the Advice Letter, the Commission’s approval of the Agreement will authorize PG&E to purchase approximately 33 gigawatt hours (“GWh”) per year of Renewables Portfolio Standard (“RPS”)-eligible energy. The RPS-eligible energy consists of Green Attributes from the Nine Canyon Wind Phase III facility in Washington (the “Project”) and energy. The Project is currently operational and has been certified by the California Energy Commission (“CEC”) as an eligible renewable energy resource (“ERR”). The Advice Letter and Agreement are currently pending approval by the Commission.

The purpose of this supplemental filing is to obtain CPUC approval of the “Commodity Transaction Amendment to Transaction” between PG&E and Barclays (the “Amendment”), which amends the Agreement by modifying certain non-modifiable

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<sup>1</sup> Supplements to Advice Letters are authorized by General Order 96-B, section 7.5.1. As PG&E’s supplemental filing only updates standard terms and conditions and provides supplemental information in compliance with CPUC Decision (“D”).10-03-021 and D.11-01-025, this filing should not delay the effective date of the advice letter.

standard terms and conditions as required by Decision (“D.”) 10-03-021, as amended by D.11-01-025<sup>2</sup>. This supplemental filing also complies with D.10-03-021, as amended by D.11-01-025, by providing certain information regarding the prices of Renewable Energy Credits (“RECs” or TRECs”) in the Agreement and the status of PG&E’s REC-only procurement.

The Amendment incorporates the Commission’s new standard terms and conditions set forth in Ordering Paragraphs 35 and 36 of D.10-03-021, as modified by D.11-01-025. In addition, the Amendment also includes an extension of a bilateral termination provision related to the date of CPUC Approval. Because details of the latter provision are confidential, market-sensitive information, PG&E is submitting the Amendment as Confidential Appendix B. PG&E is also submitting, as Confidential Appendix A, the supplemental information required by Ordering Paragraph 32 of the Decision, as modified by D.11-01-025. Pursuant to Energy Director Julie Fitch’s January 24, 2011, letter to PG&E implementing the Decision’s order to file supplemental advice letter for pending contracts (the “Fitch Letter”), the spreadsheets in Appendix A show the data and formulas used for calculations, and any underlying assumptions that PG&E has made.

### **Compliance With Ordering Paragraphs 35 and 36 of D.10-03-021, As Modified By D.11-01-025**

On March 16, 2010, the Commission issued D.10-03-021, which authorized the use of RECs to comply with California’s RPS. The Decision set forth new non-modifiable standard terms and conditions to be incorporated into agreements that it deems to involve REC-only transactions. The Decision defines bundled transactions as those in which either the RPS-eligible generator’s first point of interconnection with the Western Electricity Coordinating Council (“WECC”) interconnected transmission system is with a California balancing authority, or the RPS-eligible energy from the transaction is dynamically transferred to a California balancing authority.<sup>3</sup> All other transactions are considered REC-only transactions.

Pursuant to the Agreement, PG&E will procure energy from RPS-eligible facilities that are first interconnected to the WECC outside California. Therefore, the Projects’ first point of interconnection with WECC is not with a California balancing authority. In addition, the energy from the Project will not be dynamically transferred to a California balancing authority. Thus, as defined by the Decision, the Agreement is REC-only

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<sup>2</sup> Issued January 14, 2011.

<sup>3</sup> D.10-03-021, Ordering Paragraph 7.

transactions for purposes of RPS compliance and must comply with the additional filing requirements for such transactions as set forth in the Decision.

With the Amendment, the Agreement contains provisions that conform exactly to the “non-modifiable” terms set forth in the Decision and in previous decisions, including D.07-11-025, D.08-04-009, and D.08-08-028. Pursuant to the Fitch Letter, the applicable terms may be found in the following sections and pages of the Agreement and Amendment.

<b>Non-Modifiable Term</b>	<b>Confirmation Agmt Section Title</b>	<b>Confirmation Agmt Page No.</b>
<i>From Amended and Restated Confirmation Letter, which supplements and modifies the existing EEI Master Power Purchase and Sale Agreement</i>		
STC 1: CPUC Approval	Additional Transaction Terms – Definitions	See STC REC-3 below
STC 2: RECs and Green Attributes		
<ul style="list-style-type: none"> <li>• Definition of Green Attributes</li> </ul>	Additional Transaction Terms – Definitions	11
<ul style="list-style-type: none"> <li>• Conveyance of Green Attributes</li> </ul>	Seller’s Conveyance of Green Attributes	5
STC 6: Eligibility	Additional Transaction Terms – Eligibility	15
STC 17: Applicable Law	Additional Transaction Terms – Governing Law	17 – 18
STC REC-1 Transfer of renewable energy credits	Additional Transaction Terms – REC Eligibility	16
STC REC-2 Tracking of RECs in WREGIS	WREGIS – subsection (i)	7
STC REC-3: CPUC Approval	Additional Transaction Terms – Definitions	10
<i>From the Amendment</i>		
STC REC-1 Transfer of renewable energy credits	Amendment Item 1(D)	2 - 3
STC REC-2 Tracking of RECs in WREGIS	(i) in Amendment Item 1(A)	1 - 2
STC REC-3: CPUC Approval	Amendment Item 1(B)	2

**Compliance With Ordering Paragraph 32 of D.10-03-021, As Modified By D.11-01-025**

The Decision established a temporary price cap of \$50/TREC (“REC Price Cap”).<sup>4</sup> For REC-only contracts that provide a combined price for both RECs and energy, a REC price must be calculated to determine if the REC is below the REC Price Cap and may be used for RPS compliance. As further described in Advice Letter 3632-E, the Agreement provides PG&E with bundled renewable energy (energy and Green Attributes) delivered as a firm and shaped product at the California-Oregon Border. Under the Agreement, the prices of the Green Attributes constitute the REC prices. Though the price contained in the Agreement is confidential, market sensitive information detailed in Confidential Appendix A, the REC price set forth in the Agreement is below the REC Price Cap. PG&E has determined that the REC price of the Agreement is competitive when compared with the value that the Agreement offers within the context of PG&E’s portfolio and procurement requirements. Furthermore, the price of the Agreement is competitive with other renewable procurement options that PG&E has negotiated, as demonstrated in Confidential Appendix A.

The Decision also established a temporary cap on the amount of RECs that PG&E may use for RPS compliance.<sup>5</sup> Specifically, PG&E may meet no more than 25% of its annual procurement target (“APT”) in the years 2010-2013 with RECs. D.10-03-021 does not, however, prohibit PG&E from procuring RECs in a quantity above 25% of its annual RPS procurement obligations. To the contrary, D.10-03-021 explicitly allows PG&E to procure RECs in excess of the 25% limit and to carry forward the deliveries to a year in which the limit is not exceeded. In addition, there is no limitation on the number of years for which excess RECs may be carried forward.

In order to allow the Commission to develop a report on the REC market and the role of RECs in RPS compliance, the Decision requires PG&E to include specific information in advice letters seeking approval of REC-only transactions.<sup>6</sup> In compliance with both the Decision and the Fitch Letter, PG&E submits Confidential Appendix A, which presents the information required in REC-only advice letter filings set forth in Ordering Paragraph 32 of the Decision. Because PG&E used confidential internal energy forecasts to be consistent with the methodology PG&E has used in other CPUC RPS compliance

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<sup>4</sup> The TREC price cap will sunset December 31, 2013. See D.10-03-021, Ordering Paragraph 21, as modified by D.11-01-025, Ordering Paragraph 4M.

<sup>5</sup> The TREC usage limit cap will sunset December 31, 2013. See D.10-03-021, Ordering Paragraph 19, as modified by D.11-01-025, Ordering Paragraph 4L.

<sup>6</sup> D.10-03-021 Ordering Paragraph 32, as modified by D.11-01-025.

reports, the cells in Confidential Appendix A showing TREC procurement in relation to the cap for years 2011-2013 are redacted from the public version of the Advice Letter. Nevertheless, in light of the Fitch Letter's encouragement to make information about REC usage public, PG&E notes that its ability to procure additional RECs for use in 2011-2013 is very limited, assuming that executed contracts deliver pursuant to contract terms. In fact, PG&E calculates that it would more than fill its 25% cap in 2011 under those assumptions, and would therefore carry forward a small balance for use in later program years.

### **Effective Date**

PG&E requests that this supplemental filing become effective concurrently with the Commission's disposition of Advice Letter 3632-E.

### **Request for Confidential Treatment**

In support of this supplemental filing, PG&E has provided the following confidential information. This information is being submitted in the manner directed by D.08-04-023 and the August 22, 2006 Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with D.06-06-066 to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under either the terms of the IOU Matrix, Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023, or General Order 66-C. A separate Declaration Seeking Confidential Treatment is being filed concurrently with this supplemental filing.

### **Confidential Attachments:**

**Appendix A (Confidential) – Supplemental TREC Information**

**Appendix B (Confidential) – Commodity Transaction Amendment to Transaction**

### **Public Attachment:**

**Appendix A (Public) – Supplemental TREC Information (Redacted)**

### **Request for Commission Approval**

PG&E requests that any resolution that approves Advice Letter 3632-E also approves the Amendment.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter, excluding the confidential appendices, is being sent electronically and via U.S. mail to parties shown on the attached list and the service list for R.08-08-009, R.06-02-012, and R.08-02-007. Non-market participants who are members of PG&E's Procurement Review Group and have signed appropriate Non-Disclosure Certificates will also receive the advice letter and accompanying confidential attachments by overnight mail. Address changes should be directed to [PGETariffs@pge.com](mailto:PGETariffs@pge.com). Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

A handwritten signature in cursive script that reads "Jane Yura / lmt".

Vice President – Regulation and Rates

cc: Service List for R.08-08-009  
Service List for R.06-02-012  
Service List for R.08-02-007  
Paul Douglas - Energy Division  
Sean Simon – Energy Division  
Niki Bawa – Energy Division

Attachments

**Limited Access to Confidential Material:**

The portions of this supplemental filing marked Confidential Protected Material are submitted under the confidentiality protections of Sections 583 and 454.5(g) of the Public Utilities Code and General Order 66-C. This material is protected from public disclosure because it consists of price information, other Agreement terms and conditions, and load forecast information, all of which are protected pursuant to D.06-06-066 and D.08-04-023. A separate Declaration Seeking Confidential Treatment regarding the confidential information is filed concurrently herewith.

**Confidential Attachments:**

**Appendix A (Confidential) – Supplemental TREC Information**

**Appendix B (Confidential) – Commodity Transaction Amendment to Transaction**

**Public Attachment:**

**Appendix A (Public) – Supplemental TREC Information (Redacted)**

# 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: David Poster and Linda Tom-Martinez

Phone #: (415) 973-1082 and (415) 973-4612

E-mail: dxpu@pge.com and lmt1@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) #: **3632-E-B**

**Tier: 1**

Subject of AL: Supplemental Filing for the Contracts for Procurement of Renewable Resources Energy Resulting From Power Purchase Agreements Between Barclays Bank PLC and Pacific Gas and Electric Company

Keywords (choose from CPUC listing): Contracts, Portfolio

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

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: Yes. See the attached matrix that identifies all of the confidential information.

Confidential information will be made available to those who have executed a nondisclosure agreement:  Yes  No All members of PG&E's Procurement Review Group who have signed nondisclosure agreements will receive the confidential information.

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Valerie Winn (415-973-3839)

Resolution Required?  Yes  No

Requested effective date: **Upon CPUC Approval (concurrent with 3632-E and 3632-E-A)**      No. of tariff sheets: N/A

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 Ave.,**  
**San Francisco, CA 94102**  
**[ijnj@cpuc.ca.gov](mailto:ijnj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)**

**Pacific Gas and Electric Company**  
**Attn: Jane Yura**  
**Vice President, Regulation and Rates**  
**77 Beale Street, Mail Code B10B**  
**P.O. Box 770000**  
**San Francisco, CA 94177**  
**E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)**

**DECLARATION OF VALERIE J. WINN  
SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION CONTAINED IN  
SUPPLEMENTAL FILING 3632-E-B  
(PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)**

I, Valerie J. Winn, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1997. My current title is Manager, Renewable Energy Policy and Planning, within PG&E's Energy Procurement organization. In this position, my responsibilities include managing renewable energy regulatory policy matters including RPS compliance. I also have extensive experience in PG&E's Regulatory Relations organization and have been involved in long-term procurement planning, renewables, QF, confidentiality and other procurement-related proceedings before the Commission. Through this experience, I have become familiar with the type of information that the Commission has indicated is confidential and gained knowledge about the types of information that electricity sellers consider confidential and proprietary.

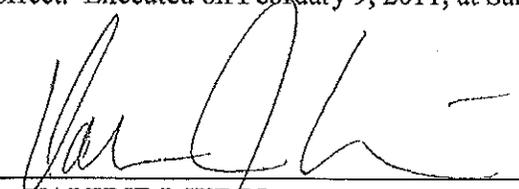
2. Based on my knowledge and experience, and in accordance with Decision ("D") 08-04-023 and the August 22, 2006 "Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066," I make this declaration seeking confidential treatment of Appendices A and B to Supplemental Filing 3632-E-B, submitted on February 9, 2011. Through this Supplemental Filing, PG&E updates information contained in Advice Letters 3632-E and 3632-E-A, which together seek the Commission's approval of a power purchase agreement (the "PPA") that PG&E has executed with Barclays Bank PLC. Confidential Appendix A contains information regarding the price of the Renewable Energy Credits ("RECs") in the PPA and PG&E's RECs procurement status, all of which information is

required to be submitted by Decision ("D.")10-03-021, as modified by D.11-01-025.

Confidential Appendix B contains an Amendment to the PPA that makes both changes to the non-modifiable terms and conditions of the PPA, as directed by D.10-03-021, as modified by D.11-01-025, and also to a termination provision related to the date of CPUC approval of the PPA.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes the particular type of data and information listed in Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023 (the "IOU Matrix"), or constitutes information that should be protected under General Order 66-C. The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, if applicable, and why confidential protection is justified. Finally, the matrix specifies that: (1) PG&E is complying with the limitations specified in the IOU Matrix for that type of data or information, if applicable; (2) the information is not already public; and (3) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that to the best of my knowledge, the foregoing is true and correct. Executed on February 9, 2011, at San Francisco, California.



VALERIE J. WINN

PACIFIC GAS AND ELECTRIC COMPANY Advice Letter 3632-E-B February 9, 2011		IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066 AND DECISION 08-04-023					
Redaction Reference	1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 and Appendix C to D.08-04-023 (Y/N)	2) Which category or categories in the Matrix the data correspond to:	3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)	4) That the information is not already public (Y/N)	5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
1 Confidential Appendix A - Project Price Comparison Table and Project Contribution Tables	Y	Item VII G) Renewable Resource Contracts under RPS program - Contracts without SEPs. Item VII (row following VII G) Score sheets, analyses, evaluations of proposed RPS projects. Item V C) LSE Total Energy Forecast - Bundled Customer (MWh). Item VI B) Utility bundled Net Open Position for Energy.	Y	Y	Y	The Project Price Comparison spreadsheet included in this Appendix describes, analyzes, and evaluates price information regarding PG&E's RPS REC-only transactions. The redacted (highlighted in gray in confidential version) portions of the Project Contribution Tables tab included in this Appendix includes information that would allow a recipient to derive PG&E's internal forecast of bundled load for 2011, 2012, and 2013 and information that shows PG&E's net open position for REC-only contracts in these years. Disclosure of any this information would provide valuable market sensitive information to competitors. Since negotiations are still in progress with bidders from the 2005, 2006, 2007, 2008, and 2009 solicitations and with other counterparties, this information should remain confidential. Release of this information would be damaging to negotiations. Furthermore, the counterparties have an expectation that the pricing terms of the PPAs will remain confidential pursuant to confidentiality provisions in the PPAs.	For information covered under Item VII G) and Item VII (row following VII G), remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner). For Item V C) and Item VI B), remain confidential for the front three years of forecast data.
3 Confidential Appendix B - Amendment to PPA	Y	Item VII G) Renewable Resource Contracts under RPS program - Contracts without SEPs.	Y	Y (Note: Non-modifiable standard terms and conditions contained in the amendment are public, but these are summarized in the public advice letter.)	Y (Non-modifiable standard terms and conditions are summarized in the public advice letter.)	The "Commodity Transaction Amendment to Transaction" is an amendment to the underlying PPA. It contains a provision to modify a termination right in the PPA that is related to the date of CPUC approval of the contract. Disclosure of any this information would provide valuable market sensitive information to competitors. Since negotiations are still in progress with bidders from the 2005, 2006, 2007, 2008, and 2009 solicitations and with other counterparties, this information should remain confidential. Release of this information would be damaging to negotiations. Furthermore, the counterparties have an expectation that the pricing terms of the PPAs will remain confidential pursuant to confidentiality provisions in the PPAs.	For information covered under Item VII G), remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner).

**Appendix A (Public)**  
**Supplemental TREC Analysis**

**Pacific Gas and Electric Company  
Advice Letter 3632-E-B, Appendix A  
Project(s) Contribution to TREC Usage Cap<sup>1</sup>**

<b>Project Name/Facility Name</b>	Barclays Bank PLC/Nine Canyon Wind
<b>Project's facility status</b>	Facility/facilities entered commercial operation on or after January 1, 2005

<b>All facilities under contract with PG&amp;E as REC only transactions</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
RPS Goal/APT (GWh)	15,361			
TREC usage cap (GWh)	3,840			
TREC deliveries from Project (GWh)	37	31	0	0
TREC deliveries from Project (as a percentage of TREC cap)	1.0%			
TREC deliveries from other facilities under contract (GWh) <sup>2</sup>	2,682	4,380	2,716	3,068
TREC deliveries from other facilities under contract (as a percentage of TREC cap) <sup>2</sup>	69.8%			
Total TREC deliveries including Project (GWh) <sup>2</sup>	2,719	4,411	2,716	3,068
Total TREC deliveries including Project (as a percentage of TREC cap) <sup>2</sup>	70.8%			
TREC headroom (exceeds cap) (GWh) <sup>3</sup>	1,122			

<b>TREC online facilities <sup>4</sup></b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
TREC deliveries from online facilities (GWh) <sup>2</sup>	2,060	3,411	1,353	695
Total TREC deliveries from online facilities (as a percentage of TREC cap) <sup>2</sup>	53.7%			

<b>TREC not online facilities <sup>5</sup></b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
TREC deliveries from not online facilities (GWh)	658	1,000	1,363	2,373
Total TREC deliveries from not online facilities (as a percentage of TREC cap)	17.1%			

**Footnotes:**

<sup>1</sup> Deliveries only shown for 2010 through 2013, as applicable TREC usage cap only applies to these years.

<sup>2</sup> For contracts that have been redefined as REC-only contracts by Decision 10-03-021 (REC decision), estimated deliveries from January 1, 2010 to March 11, 2010 are excluded from the totals because prior to the effectiveness of the REC decision, they are counted as a bundled contract.

<sup>3</sup> This table assumes that earmarked TRECs are used for compliance in the year they are delivered. PG&E reserves the right to apply TRECs toward any applicable cap in any year in which they are actually used for RPS compliance, including, if appropriate, the year in which they were earmarked. Such changes could alter the headroom calculations presented above. Additionally, TRECs above the cap in any year may be earmarked to prior years, or banked for future years.

<sup>4</sup> Facilities delivering or contractually obligated to deliver to PG&E pursuant to executed contracts in which the facility was already online as of the execution date of its associated contract.

<sup>5</sup> Facilities delivering or contractually obligated to deliver to PG&E pursuant to executed contracts in which the facility was not yet online as of the execution date of its associated contract.

**CONFIDENTIAL**

**Pacific Gas and Electric Company**  
**Workpapers Supporting Advice Letter 3632-E-B**  
**Detailed Project Information**

	Project Name/Facility Name	Facility(s) Online/Not Online (at time of execution of contract)	Execution Date	Facility COD per PPA	Deliveries per Contract Quantity Provision in PPA (MWh)			
					2010	2011	2012	2013
1	Arlington Wind Power Project LLC*	Not Online	5/28/2008	12/26/2008	193,778	239,999	240,657	239,999
2	El Dorado Solar (Sempra)*	Not Online	12/19/2008	1/1/2009	18,175	22,854	22,671	22,490
3	Barclays Bank PLC/Hay Canyon Wind	Online	1/15/2010	2/13/2009	250,000	250,000	0	0
4	<b>Barclays Bank PLC/Nine Canyon Wind</b>	<b>Online</b>	<b>2/16/2010</b>	<b>5/1/2008</b>	<b>36,625</b>	<b>30,750</b>	<b>0</b>	<b>0</b>
5	Blackspring Ridge IA Wind Project LP	Not Online	2/19/2010	12/31/2012	0	0	0	445,000
6	Blackspring Ridge IB Wind Project LP	Not Online	2/19/2010	12/31/2012	0	0	0	445,000
7	Halkirk I Wind Project LP	Not Online	2/19/2010	12/31/2011	0	0	362,462	484,000
8	Klondike III Wind Power, LLC*	Not Online	6/26/2007	11/1/2007	222,544	264,864	265,368	264,864
9	Klondike Wind Power IIIA, LLC and Bonneville Power Administration*	Online	8/11/2008	Existing facility and expansion project were operational at time of contract execution.	193,803	265,000	265,726	265,000
10	Pacificorp (2010 portion)*	Online	9/15/2009	8 facilities, all online as of contract execution	484,779			0
11	Pacificorp (2011 portion)	Online	9/15/2009	8 facilities, all online as of contract execution		655,000		0
12	Pacificorp (2012 portion)	Online	9/15/2009	8 facilities, all online as of contract execution			657,000	0
13	Powerex Corp.	Online	12/18/2009	Multiple facilities with online/not-online status unknown for each facility as of contract execution.	0	330,000	330,000	330,000
14	Puget Sound Energy, Inc.	Online	4/10/2009	2 facilities, both online as of execution.	0	1,000,000	0	0
15	Shell Energy North America (US), L.P./White Creek (2010 portion)	Online	5/22/2009	8/24/2007	52,000		0	0
16	Shell Energy North America (US), L.P./White Creek (2011 portion)	Online	5/22/2009	8/24/2007		52,000	0	0
17	Shell Energy North America (US), L.P./Big Horn	Online	5/22/2009	2/1/2006	75,000	0	0	0
18	Shell Energy North America (US), L.P./Big Horn II	Online	12/22/2009	2/1/2006	96,678	0	0	0
19	Shell Energy North America (US), L.P./Combine Hills II	Online	12/22/2009	12/21/2009	161,791	163,000	0	0
20	Shell Energy North America (US), L.P./Wheat Field	Online	12/22/2009	4/1/2009	253,790	255,000	0	0
21	Shell Energy North America (US), L.P./Harvest Wind I	Online	1/29/2010	12/1/2009	74,000	74,000	0	0
22	Shell Energy North America (US), L.P./Harvest Wind II	Online	1/29/2010	12/1/2009	40,000	0	0	0
23	Shell Energy North America (US), L.P./White Creek II	Online	1/29/2010	8/24/2007	176,283	171,000	0	0
24	Shell Energy North America (US), L.P./White Creek III	Online	1/29/2010	8/24/2007	65,700	65,700	0	0
25	Sierra Pacific Industries	Online	9/23/2009	multiple facilities, all online as of contract execution	100,000	100,000	100,000	100,000
26	Solar Partners XII, LLC/BrightSource III	Not Online	3/25/2008	7/1/2014	0	0	0	0
27	Solar Partners XIV, LLC/BrightSource IV	Not Online	3/25/2008	7/1/2015	0	0	0	0
28	TransAlta Corporation	Not Online	9/15/2009	3/31/2010	195,000	195,000	195,000	195,000
29	Vantage Wind Energy LLC	Not Online	8/17/2009	10/4/2010	28,716	277,000	277,000	277,000

**Notes:**

Projects in bold are the subject of this advice letter.

\*Indicates that for 2010, deliveries between January 1, 2010 and March 11, 2010 are not counted as TREC purchases and are therefore not included in this table.

**Facility Status (for menu items only)**

Facility/facilities entered commercial operation before January 1, 2005

Facility/facilities entered commercial operation on or after January 1, 2005

Facility/facilities not in commercial operation at the time the contract was signed

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

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