

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 30, 2014

Advice Letter 4546-E and 4546-E-A

Meredith Allen
Senior Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**Subject: Modifications to PG&E's 2014 Renewables Portfolio
Standard Procurement Plan and Supplemental**

Dear Ms. Allen:

Advice Letter 4546-E and 4546-E-A are effective December 23, 2014.

Sincerely,

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

Edward Randolph
Director, Energy Division

December 23, 2014

Advice 4546-E-A

(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

Subject: Supplemental Modifications to PG&E's 2014 Renewables Portfolio Standard Procurement Plan**I. Purpose**

Pacific Gas and Electric Company ("PG&E") respectfully submits this supplement to Advice Letter 4546-E in order to revise PG&E's original request for the California Public Utilities Commission's ("Commission" or "CPUC") approval of modifications to PG&E's approved 2014 Renewables Portfolio Standard ("RPS") Procurement Plan ("2014 RPS Plan"). Specifically, PG&E retracts in this supplemental advice letter its request in the original advice letter to make certain modifications in the 2014 RPS Plan associated with a revised retail sales forecast. Additionally, PG&E seeks approval in this supplemental advice letter to extend the schedule for PG&E's 2014 RPS Solicitation by two weeks in order to accommodate delay in issuance of the Solicitation.

II. Background

PG&E filed Advice Letter 4546-E on December 8, 2014 in compliance with Ordering Paragraph ("OP") 11 of Decision ("D.") 14-11-042 (the "Decision"), which orders PG&E to file an Advice Letter to seek California Public Utilities Commission approval to modify its 2014 Renewables Portfolio Standard ("RPS") Procurement Plan in certain circumstances. Advice Letter 4546-E contained a table that generally described the changes made in the concurrently filed "Final 2014 RPS Plan" for which PG&E sought approval, provided document and section references for those changes, and noted the type of change in each instance that allows for it to be considered by Tier 1 Advice Letter.

In order to ensure that the formal RPS Implementation docket (R.11-05-005) contains a complete record of this proceeding, PG&E is today filing a revised version of the Final 2014 RPS Plan (the "Final (Revision 1) 2014 RPS Plan"), which includes the supplemental modifications proposed in this supplemental Advice Letter. PG&E's Final (Revision 1) 2014 RPS Plan includes both clean and redlined versions of the Final (Revision 1) 2014 RPS Plan,^{1/} with the redline showing

^{1/} See Final (Revision 1) 2014 RPS Plan, filed in R.11-05-005 on December 23, 2014, Appendix I (redline of 2014 RPS Solicitation Protocol, including the 2014 Form RPS PPA); *id.* Appendix A (redline of the 2014 RPS Plan, including Appendices D and G).

changes from the Final 2014 RPS Plan filed on December 8, 2014. While PG&E has sought to generally describe the supplemental modifications in this supplemental Advice Letter, PG&E refers to and incorporates by reference into this supplemental Advice Letter the complete redlines included with its Final (Revision 1) 2014 RPS Plan. PG&E has not attached the Final (Revision 1) 2014 RPS Plan again to this supplemental Advice Letter in order to avoid unnecessary redundancy.

III. Supplemental Changes in the Final (Revision 1) 2014 RPS Plan Documents

PG&E's supplemental modifications to the 2014 RPS Plan are intended to remove text added in the Final 2014 RPS Plan filed on December 8, 2014 that referred to or incorporated an alternative retail sales forecast that PG&E filed in the Long-Term Procurement Planning ("LTPP") proceeding (R.13-12-10) on October 3, 2014. Specifically, PG&E has proposed deleting Section 17 of the Plan, a number of footnotes referring to Section 17, language in the introductory sections of the Plan referring to the alternative retail sales forecast, and Appendices C.3 and C.4 of the Plan, which were Renewable Net Short tables incorporating the alternative retail sales forecast. PG&E has also reversed changes it made in the 2014 RPS Solicitation Protocol (Appendix H to the 2014 RPS Plan) (the "Protocol") referring to the alternative retail sales forecast.

Additionally, PG&E has proposed new changes in the Protocol and Attachment A to the Protocol that would extend by two weeks the schedule for the 2014 RPS Solicitation set forth in Ordering Paragraph 33 of D.14-11-042. That Ordering Paragraph provides: "The Energy Division Director is authorized, after notice to the service list of this proceeding, to change the schedule as appropriate or as necessary for the efficient administration of the 2014 Renewables Portfolio Standard solicitation process." PG&E is providing notice of this requested extension by this supplemental Advice Letter and will deem Energy Division's approval of this advice letter as approval of the schedule extension pursuant to the authority granted to the Energy Division Director in Ordering Paragraph 33. The schedule extension is necessary to accommodate the delay in the issuance of PG&E's 2014 RPS Solicitation.

Other than the supplemental changes specifically noted above, PG&E's 2014 RPS Plan remains substantively the same as the version filed on December 8, 2014.

IV. Request for Commission Approval

PG&E requests the Commission approve the modifications to PG&E's Final (Revision 1) 2014 RPS Procurement Plan through issuance of an Energy Division disposition letter approving Advice Letters 4546-E and 4546-E-A. PG&E requests that the Energy Division issue its disposition letter prior to the January 5, 2015 target date for initiation of PG&E's 2014 RPS Solicitation.

Protests

Pursuant to General Rule 7.5.1 of General Order 96-B, the filing of this supplement does not automatically continue the protest period or delay the effective date of the advice letter. Thus, anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 28, 2014, which is 20 days after the date of the filing of Advice Letter 4546-E. Any person may also submit a request to the Commission's Energy Division to continue the protest period pursuant to General Rule 7.5.1. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@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 shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Meredith Allen
Senior Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-7226
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

IV. Tier Designation

PG&E is designating this as a supplement to a Tier 1 Advice Letter, in accordance with D.14-11-042.

V. Effective Date

Pursuant to General Order 96-B, this advice letter will be effective pending disposition.

VI. 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 service list for R.11-05-005. Address changes to the General Order 96-B list and electronic approvals should be directed to 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. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

/S/

Meredith Allen
Senior Director – Regulatory Relations

cc: Paul Douglas – Energy Division
Cheryl Lee – Energy Division
Service List for R.11-05-005

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 E)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Jennifer Wirowek

Phone #: (415) 973-1419

E-mail: j6ws@pge.com and PGETariffs@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) #: **4546-E-A**

Tier: **1**

Subject of AL: **Supplemental Modifications to PG&E's 2014 Renewables Portfolio Standard Procurement Plan**

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 #: D.14-11-042

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: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: N/A

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes No

N/A

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

Resolution Required? Yes No

Requested effective date: **December 23, 2014**

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: 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 days¹ after the date of the initial filing, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission

Energy Division

EDTariffUnit

505 Van Ness Ave., 4th Flr.

San Francisco, CA 94102

E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Meredith Allen

Senior Director, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

¹ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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

| | | |
|---|---|--|
| AT&T | Division of Ratepayer Advocates | Occidental Energy Marketing, Inc. |
| Albion Power Company | Douglass & Liddell | OnGrid Solar |
| Alcantar & Kahl LLP | Downey & Brand | Pacific Gas and Electric Company |
| Anderson & Poole | Ellison Schneider & Harris LLP | Praxair |
| BART | G. A. Krause & Assoc. | Regulatory & Cogeneration Service, Inc. |
| Barkovich & Yap, Inc. | GenOn Energy Inc. | SCD Energy Solutions |
| Bartle Wells Associates | GenOn Energy, Inc. | SCE |
| Braun Blaising McLaughlin, P.C. | Goodin, MacBride, Squeri, Schlotz & Ritchie | SDG&E and SoCalGas |
| CENERGY POWER | Green Power Institute | SPURR |
| California Cotton Ginners & Growers Assn | Hanna & Morton | Seattle City Light |
| California Energy Commission | In House Energy | Sempra Utilities |
| California Public Utilities Commission | International Power Technology | SoCalGas |
| California State Association of Counties | Intestate Gas Services, Inc. | Southern California Edison Company |
| Calpine | K&L Gates LLP | Spark Energy |
| Casner, Steve | Kelly Group | Sun Light & Power |
| Center for Biological Diversity | Linde | Sunshine Design |
| City of Palo Alto | Los Angeles County Integrated Waste Management Task Force | Tecogen, Inc. |
| City of San Jose | Los Angeles Dept of Water & Power | Tiger Natural Gas, Inc. |
| Clean Power | MRW & Associates | TransCanada |
| Coast Economic Consulting | Manatt Phelps Phillips | Utility Cost Management |
| Commercial Energy | Marin Energy Authority | Utility Power Solutions |
| Cool Earth Solar, Inc. | McKenna Long & Aldridge LLP | Utility Specialists |
| County of Tehama - Department of Public Works | McKenzie & Associates | Verizon |
| Crossborder Energy | Modesto Irrigation District | Water and Energy Consulting |
| Davis Wright Tremaine LLP | Morgan Stanley | Wellhead Electric Company |
| Day Carter Murphy | NLine Energy, Inc. | Western Manufactured Housing Communities Association (WMA) |
| Defense Energy Support Center | NRG Solar | YEP Energy |
| Dept of General Services | Nexant, Inc. | |