

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 16, 2014

Advice Letter 3534-G

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: Expedited Advice Letter Requesting Approval to
Enter into Incremental Storage Contracts**

Dear Ms. Allen:

Advice Letter 3534-G is effective December 15, 2014.

Sincerely,

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

Edward Randolph
Director, Energy Division

November 24, 2014

Advice 3534-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject: Expedited Advice Letter Requesting Approval to Enter into
Incremental Storage Contracts**

In order to comply with the requirements of Pacific Gas and Electric Company's (PG&E) 1-day-in-10-year planning standard adopted in Decision (D.) 06-07-010, PG&E respectfully requests California Public Utilities Commission (CPUC or Commission) approval to enter into two one-year incremental storage contracts to replace an existing four-year contract which expires on February 28, 2015.

Purpose

The purpose of this expedited advice letter is to request approval to replace an existing incremental storage contract which expires on February 28, 2015. Under the capacity acquisition procedure approved in D.04-09-022,¹ and later modified in D.06-10-035, contracts for interstate and storage capacity supported by the Office of Ratepayer Advocates (ORA) and The Utility Reform Network (TURN) may be submitted to the Commission for approval by an Expedited Advice Letter. As described in D.04-09-022, TURN's involvement in the process is voluntary and TURN has elected not to participate in the evaluation of this storage agreement.² PG&E has consulted with ORA and received its concurrence for the proposed storage contracts.

Under D.04-09-022, as modified by D.06-10-035, PG&E may seek Commission approval of contracts for storage capacity within 21 days of the advice letter filing date. Consequently, PG&E requests that the Commission approve this filing by December 15, 2014.

¹ Order Instituting Rulemaking to Establish Policies and Rules to Ensure Reliable, Long-Term Supplies of Natural Gas to California (Gas Capacity OIR), R.04-01-025.

² D.04-09-022 page 28 states, "We include TURN in the agreement process, with the understanding that TURN's participation is voluntary."

Description of Contract

The terms of the proposed contracts are confidential and are described in Appendix A. Confidential Appendix A is submitted to the Energy Division and ORA under the confidentiality provisions of General Order 66-C and Section 583 of the Public Utilities Code. The public version of this Advice Letter is provided to the service lists for A.05-03-011 and A.13-06-011.

The storage contracts will be utilized by PG&E's Core Gas Supply Department for its bundled core gas supply customers. The contracts will not be allocated or assigned to Core Transport Agents. All costs associated with the contracts will be recovered from PG&E's bundled core gas customers through PG&E's Core Fixed Storage Account and through PG&E's gas tariffs.

This filing will not affect any other rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule.

Protests – Ten Day Expedited Period

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 December 4, 2014, which is ten (10) days from the date of this filing, in accordance with the expedited protest period authorized in D.04-09-022.

Protests should be mailed 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 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:

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

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

Effective Date

In accordance with the expedited comment and evaluation period provided in D.04-09-022, PG&E submits this advice letter as a Tier 2 and requests Commission approval of this filing effective December 15, 2014, which is 21 days after the date of this filing.

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 lists for A.05-03-001 and A.13-06-011. Address changes to the General Order 96-B service list should be directed to email 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>.

/S/

Meredith Allen
Senior Director, Regulatory Relations

cc: **Confidential Version (with Appendix A)**

Richard A. Myers - Energy Division
Eugene Cadenasso – Energy Division
Jonathon Bromson - Legal Division
R. Mark Pocta - Office of Ratepayer Advocates
Nathaniel Skinner – Office of Ratepayer Advocates
Pearlie Sabino - Office of Ratepayer Advocates

Public Version (without Appendix A)

Service list for A.05-03-001
Service list for A.13-06-011

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 G)**

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) #: **3534-G**

Tier: 2

Subject of AL: **Expedited Advice Letter Pre-Approval to Enter into Incremental Storage Contracts**

Keywords (choose from CPUC listing): Storage, Contracts

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D. 06-07-010

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 the confidential information.

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Dennis Gee (415) 973-4337

Resolution Required? Yes No

Requested effective date: **December 15, 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 10 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

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

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF
CALIFORNIA**

**DECLARATION OF DENNIS GEE IN SUPPORT OF
THE CONFIDENTIAL TREATMENT OF
ADVICE LETTER 3534-G**

I, Dennis Gee, declare:

1. I am a Principal Regulatory Analyst in the Core Gas Supply organization at Pacific Gas and Electric Company (PG&E). I am responsible for regulatory matters and contract management pertaining to PG&E's core gas portfolio. This declaration is based on my personal knowledge of PG&E's core gas portfolio and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information concerning fuels management of an investor- owned utility.

2. Based on my knowledge and experience, I make this declaration seeking confidential treatment for certain information contained in PG&E's Advice Letter 3534-G "Expedited Advice Letter Requesting Approval to Enter into Incremental Storage Contracts."

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 information that should be protected under General Order 66-C. The matrix specifies that: (1) the information is not already public; and (2) 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 that is pertinent in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on November 24, 2014 at San Francisco, California.

_____/s/_____
Dennis Gee
Principal Regulatory Analyst
Core Gas Supply
Pacific Gas and Electric Company
DENNIS GEE

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 G)
ADVICE LETTER 3534-G
November 24, 2014**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	1) Constitutes data listed in Appendix 1 to D.06-06-066 (Y/N)	2) Data correspond to category in Appendix 1:	3) Complies with limitations of D.06-06-066 (Y/N)	4) Data not already public (Y/N)	5) Lead to partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
Appendix A	N	CPUC General Order (G.O.) 66-C	N/A	N	Y	The information constitutes confidential business information protected under GO 66-C.	Indefinite

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

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