September 29, 2006

Advice 2908-E
(Pacific Gas and Electric Company ID U 39 E)

Subject: Monthly Resource Adequacy (RA) Filing for Compliance-Month November 2006 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 November 2006 is included in Confidential Attachment 2. In addition, the California Public Utilities Commission (CPUC) requested officer certification is included in Attachment 1 of the filing.

A portion of the information provided in Attachment 2 is commercially sensitive and confidential protected material and is being submitted subject to the protections of Section 583 of the California Public Utilities Code and pursuant to: i) the “Revised Protective Order Regarding Confidentiality of Market Sensitive Load Data and Information” that ALJ Wetzell issued in his February 10, 2006, ruling; ii) the California Energy Commission’s (CEC) agreement to adhere to that protective order, which the CEC signed on February 14, 2006; and iii) 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 November 2006, pursuant to the Decision and subsequent CPUC guidelines.\(^1\)

This advice letter contains:

**Attachment 1:** Declaration of Vincent Loh supporting the confidentiality claims made in this filing.

**Partially Confidential Attachment 2:** RA Reporting Workbook for November 2006. *This workbook contains commercially sensitive information as marked as well the required signed officer Certification.*

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

Attachments 1 and 2 are also included in an attached CD containing electronic filings of 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.

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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\(^1\) 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.
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, September 29, 2006, 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).

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

http://www.pge.com/tariffs

Vice President, Regulatory Relations

Attachments

cc: California Energy Commission
    California Independent System Operator
### Company name/CPUC Utility No.
Pacific Gas and Electric Company U39M

<table>
<thead>
<tr>
<th>Energy Utility</th>
<th>Contact Person</th>
<th>Phone #</th>
<th>E-mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>ELC GAS</td>
<td>David Poster</td>
<td>(415) 973-1082</td>
<td><a href="mailto:dxpu@pge.com">dxpu@pge.com</a></td>
</tr>
</tbody>
</table>

#### EXPLANATION OF UTILITY TYPE
ELC = Electric, GAS = Gas, PLC = Pipeline, HEAT = Heat, WATER = Water

**Advice Letter (AL) #: 2908-E**
Subject of AL: Monthly Resource Adequacy Filing for Compliance – Month November 2006 Submitted Pursuant to Decision 05-10-042, Opinion on RA Requirements
Keywords (choose from CPUC listing): Compliance, Procurement
AL filing type: Monthly
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
Summarize differences between the AL and the prior withdrawn or rejected AL:

Resolution Required? Yes
Requested effective date: 9/29/2006
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: Retail Electric Rates

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

Protests 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
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
jjr@cpuc.ca.gov and jnj@cpuc.ca.gov
Worksheet A. CERTIFICATION FORM

Name of Load Serving Entity (LSE): PG&E
Energy Service Provider Registration Number (if applicable): PCG2

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 Kura
Title: Vice President - Energy Supply
Date: 9/23/2006
Signature (sign the hard copy of filing):

Contact Person for Questions about this Filing:

Name: Vincent Loch
Title: Principal - Short Term Strategy
Email: vkl2@pge.com
Telephone: 415-972-5564
Address: 245 Market St., 1314B
City: San Francisco
State: CA
Zip: 94105

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

Name: Terrance Robertson
Title: Principal - Long-Term Strategy
Email: tmr4@pge.com
Telephone: 415-573-6900