

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 8, 2014

Advice Letter 4302-E

Brian Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: Information-Only Filing Regarding 2012 Quarterly Compliance Reports
for 1st Q(4033-E-A), 2nd Q(4091-E-A & 3rd Q(4132-E-A) - Financial Gas
Transactions not in Compliance w/ Bundled Procurement Plan**

Dear Mr. Cherry:

The Energy Division Tariff Unit acknowledges receipt and review of PG&E Information-Only Advice Letter 4302-E, effective as of October 14, 2013.

Sincerely,

Edward Randolph
Director, Energy Division



Brian K. Cherry
Vice President
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-7226

October 14, 2013

Advice 4302-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Information-Only Filing Regarding 2012 Quarterly Compliance Reports for Quarter 1 (Advice 4033-E-A), Quarter 2 (Advice 4091-E-A) and Quarter 3 (Advice 4132-E-A) – Financial Gas Transactions not in Compliance with Bundled Procurement Plan

Purpose

The purpose of this advice letter is to provide notice of and information summarizing certain financial gas transactions that occurred during 2012 that were reported in Pacific Gas and Electric Company's (PG&E) Quarterly Compliance Reports (QCR) for Quarter 1, Quarter 2 and Quarter 3, 2012 but that were not in compliance with PG&E's approved Electric Portfolio Hedging Plan (Hedging Plan). Concurrent with this advice letter, PG&E is filing testimony in Phase 2 of the 2012 Energy Resource Recovery Account (ERRA) Compliance proceeding (Application 13-02-023) that describes these transactions and requests Commission action in that proceeding regarding the transactions. Because PG&E is requesting California Public Utilities Commission (CPUC or Commission) action in the 2012 ERRA Compliance proceeding, this advice letter is informational in nature and does not seek additional Commission action.

PG&E submitted the non-compliant 2012 financial gas transactions to the Commission as part of its Quarter 1, Quarter 2, and Quarter 3, 2012, QCR advice letters (Advice Letters 4033-E-A, 4091-E-A, and 4132-E-A, respectively) for review and approval in compliance with PG&E's Commission-approved Bundled Procurement Plan (BPP). The Quarter 1, Quarter 2, and Quarter 3, 2012 QCRs were approved by the Energy Division via disposition letters with effective dates of December 7, 2012, March 26, 2013, and August 8, 2013, respectively.

Although this advice letter summarizes the non-compliant transactions and the corrective actions that PG&E has taken to ensure that this issue does not re-occur, PG&E is requesting approval of these transactions and associated activity in Phase 2 of its 2012 ERRA Compliance Proceeding Compliance Proceeding. Specifically, in

Phase 2 of its 2012 ERRA Compliance Proceeding, PG&E is requesting that the Commission: (1) approve the non-compliant transactions that occurred during the 2012 record period, (2) approve four transactions that were executed in September 2013 to offset the unexpired, non-compliant 2012 transactions in PG&E's portfolio, and (3) direct that the net gain from these transactions be retained in PG&E's ERRA balancing account, which would result in a net benefit for PG&E's customers. Attachment A to this advice letter includes the public version of PG&E's 2012 ERRA Compliance Proceeding Phase 2 Testimony. A confidential version of PG&E's Phase 2 testimony was provided to Administrative Law Judge Roscow and the Office of Ratepayer Advocates (ORA) in the 2012 ERRA Compliance proceeding.

Summary of Transactions

During a recent internal review of 2013 hedging transactions, PG&E determined that certain transactions that occurred in 2013 were outside one of the operating targets in PG&E's Hedging Plan. As a result of this discovery, PG&E reviewed transactions from 2012 to determine if this same limit had been exceeded in that year. PG&E discovered forty eight (48) transactions that were executed in the first three quarters of 2012 that were not in compliance with PG&E's Hedging Plan because one of the Hedging Plan's limits had been exceeded. These 48 transactions complied with the other BPP and Hedging Plan requirements and limits, including approved products, approved transaction processes, and approved energy markets. However, these transactions did not comply with one of the Hedging Plan operating targets.

The non-compliant transactions occurred because a control for one of the operating targets in the Hedging Plan was not included in PG&E's electronic hedging implementation model. The electronic model guides PG&E's execution of hedges and has embedded controls for Hedging Plan limits and targets that constrain when a transaction can be executed. If the operating target limit had been included in PG&E's electronic model, the 48 non-compliant transactions would not have been executed.

At the time PG&E discovered the non-compliant transactions, 37 of the 48 transactions had already settled. Since the remaining 11 transactions were still exposed to market price risk, PG&E executed four offsetting transactions during the first week of September 2013 to close out the open positions for the remaining 11 transactions. Therefore, all non-compliant 2012 transactions positions have been closed and a resulting net gain of \$416,122, net of broker and exchange fees, will be realized.

Since discovering the non-compliant transactions, PG&E has implemented additional procedural controls that will prevent the reoccurrence of this issue by updating its electronic model to include all provisions (constraints and limits) in the Hedging Plan. This model has already been modified to include the limit that would have prevented the execution of the non-compliant trades discussed here and was modified to correct a minor calculation error. In addition to updating the electronic model, PG&E

has developed a compliance report that will demonstrate that each of PG&E's gas financial trades complied with all provisions of its Hedging Plan. PG&E will provide copies of these reports for all financial trades executed in 2012 as confidential workpapers to the Phase 2 Testimony and will begin providing them with its Quarterly Compliance Reports beginning Q4 2013. For a more detailed discussion of the transactions please refer to Attachment A to this filing, PG&E's 2012 ERRA Compliance Proceeding Phase 2 Testimony.

Protests

This is an information-only advice letter filing. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter. Instead, PG&E is seeking relief regarding the non-compliant 2012 transactions in the 2012 ERRA Compliance proceeding.

Effective Date

PG&E requests that this information-only advice filing become effective October 14, 2013, the date of filing.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically on the attached service list and the service lists for Rulemaking ("R.") 12-03-014, R.01-10-024, R.11-10-023, and A.13-02-023. Address changes to the General Order 96-B service list and all 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>.

Brian Cherry /IG

Vice President – Regulatory Relations

Public Attachments:

Attachment A:	A.13-02-023, Phase 2 Testimony (Public Version)
Attachment B:	Confidentiality Declaration and Matrix

cc: Service List R.12-03-014, R.01-10-024, R.11-10-023, A.13-02-023 & PG&E's Procurement Review Group

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: **Igor Grinberg**

Phone #: **(415) 973-8580**

E-mail: **ixg8@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) #: **4302-E**

Tier: **N/A**

Subject of AL: **Informational Filing Regarding 2012 Quarterly Compliance Reports for Quarter 1 (Advice 4033-E-A), Quarter 2 (Advice 4091-E-A) and Quarter 3 (Advice 4132-E-A) – Financial Gas Transactions not in Compliance with Bundled Procurement Plan**

Keywords (choose from CPUC listing): **Compliance, Procurement**

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

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

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: **N/A**

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: **Yes, please see attached Declaration and Matrix.**

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: **Peter E. Koszalka (415) 973-3818**

Resolution Required? Yes No

Requested effective date: **October 14, 2013**

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**

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

ED Tariff Unit

505 Van Ness Ave., 4th Floor

San Francisco, CA 94102

E-mail: **EDTariffUnit@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**

Application: 13-02-023
(U 39 E)
Exhibit No.: _____
Date: October 14, 2013
Witnesses: Various

PACIFIC GAS AND ELECTRIC COMPANY

PHASE 2 TESTIMONY

**APPLICATION FOR COMPLIANCE REVIEW OF UTILITY OWNED
GENERATION OPERATIONS, ELECTRIC ENERGY RESOURCE
RECOVERY ACCOUNT ENTRIES, CONTRACT ADMINISTRATION,
ECONOMIC DISPATCH OF ELECTRIC RESOURCES,
UTILITY RETAINED GENERATION FUEL PROCUREMENT,
AND OTHER ACTIVITIES FOR THE PERIOD
JANUARY 1 THROUGH DECEMBER 31, 2012**



PACIFIC GAS AND ELECTRIC COMPANY
 APPLICATION FOR COMPLIANCE REVIEW OF UTILITY OWNED GENERATION
 OPERATIONS, ELECTRIC ENERGY RESOURCE RECOVERY ACCOUNT ENTRIES,
 CONTRACT ADMINISTRATION, ECONOMIC DISPATCH OF ELECTRIC
 RESOURCES, UTILITY RETAINED GENERATION FUEL PROCUREMENT, AND
 OTHER ACTIVITIES FOR THE PERIOD
 JANUARY 1 THROUGH DECEMBER 31, 2012
 PHASE 2 TESTIMONY

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Attachment B	LIST OF TRANSACTIONS	
Attachment C	TRANSACTIONS PRESENTED IN THE 2012 QUARTERLY COMPLIANCE REPORTS	

**PACIFIC GAS AND ELECTRIC COMPANY
PHASE 2 TESTIMONY
ELECTRIC PORTFOLIO HEDGING PLAN:
GAS FINANCIAL TRANSACTIONS**

PACIFIC GAS AND ELECTRIC COMPANY
PHASE 2 TESTIMONY
ELECTRIC PORTFOLIO HEDGING PLAN: GAS FINANCIAL TRANSACTIONS

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1 **PACIFIC GAS AND ELECTRIC COMPANY**
2 **PHASE 2 TESTIMONY**
3 **ELECTRIC PORTFOLIO HEDGING PLAN:**
4 **GAS FINANCIAL TRANSACTIONS**

5 **A. Introduction**

6 This testimony discusses certain financial gas transactions that occurred
7 during the January 1 to December 31, 2012 record period and were reported in
8 Pacific Gas and Electric Company's (PG&E) Quarterly Compliance Reports
9 (QCR) for Quarter 1, Quarter 2 and Quarter 3, 2012 that were not in compliance
10 with PG&E's approved Electric Portfolio Hedging Plan (Hedging Plan).

11 PG&E requests that the California Public Utilities Commission (CPUC or
12 Commission) approve the non-compliant transactions that occurred during the
13 record period, approve the four transactions that were recently executed to
14 offset the unexpired, non-compliant transactions in PG&E's portfolio, and direct
15 that the net gain from these transactions be retained in PG&E's Energy
16 Resource Recovery Account (ERRA) balancing account, which results in a net
17 benefit for PG&E's customers. The remainder of this testimony:

- 18 (1) describes the non-compliant transactions that occurred during the record
19 period;
20 (2) explains which Hedging Plan target was exceeded and why the transactions
21 were executed outside of that target;
22 (3) discusses the corrective actions PG&E has put in place to ensure future
23 compliance with Hedging Plan targets before executing transactions; and
24 (4) requests that the Commission approve: (i) the non-compliant transactions
25 that occurred during the record period; (ii) the 2013 transactions that were
26 used to offset unexpired transactions; and (iii) the retention of the net gain in
27 ERRA for the benefit of customers.

28 **B. Description of Transactions and Explanation of Operating Target**
29 **Exceedence**

30 During a recent internal review of 2013 hedging transactions, PG&E
31 determined that certain transactions that occurred in 2013 were outside one of

1 the operating targets in PG&E's Hedging Plan.¹ As a result of this discovery,
2 PG&E reviewed transactions from 2012 to determine if this same limit had been
3 exceeded in that year.² PG&E discovered forty-eight (48) transactions that were
4 executed in the first three quarters of 2012 that were not in compliance with
5 PG&E's Hedging Plan because one of the Hedging Plan's limits had been
6 exceeded. These 48 transactions complied with the other Bundled Procurement
7 Plan (BPP) and Hedging Plan requirements and limits, including approved
8 products, approved transaction processes, and approved energy markets.
9 However, these transactions did not comply with one of the Hedging Plan
10 operating targets.³

11 The non-compliant transactions occurred because a control for one of the
12 operating targets in the Hedging Plan was not included in PG&E's electronic
13 hedging implementation model. The electronic model guides PG&E's execution
14 of hedges and has embedded controls for Hedging Plan limits and targets that
15 constrain when a transaction can be executed. If the operating target limit had
16 been included in PG&E's electronic model, the 48 non-compliant transactions
17 would not have been executed. PG&E has updated its electronic trading model
18 to include a control for this limit, as discussed in more detail below in Section C.
19 This correction is designed to ensure future transactions are in compliance with
20 PG&E's BPP.

21 PG&E temporarily suspended all financial gas trading in order to carefully
22 review the electronic model to ensure that all limits and targets in the Hedging
23 Plan are accurately included. In addition to the omission described above,
24 PG&E found one calculation error which had no impact on trading activities and
25 that two additional provisions from the Hedging Plan were omitted from the
26 model. PG&E has reviewed all the remaining trades executed in 2012 and

¹ Non-compliant transactions that occurred in 2013 will be addressed in PG&E's 2013 ERRRA Compliance application which will be filed in February 2014.

² PG&E's current Electric Portfolio Hedging Plan was approved as part of its 2010 Bundled Procurement Plan on January 12, 2012 in Decision (D.) 12-01-033. The limit exceeded by the subject trades was first implemented under this plan. This application of the limit was not included in PG&E's previous electric portfolio hedging plans.

³ Since PG&E's Hedging Plan is confidential under D.06-06-066 and Public Utilities Code (PUC) Sections 454.5(g) and 583, the operating target limitations are described in Confidential Attachment A to this testimony.

1 found that all of them were in compliance with these two provisions (i.e., none of
2 the trades would have been prevented by those provisions).

3 At the time PG&E discovered the non-compliant transactions, 37 of the
4 48 transactions had already settled. Since the remaining 11 transactions were
5 still exposed to market price risk, PG&E executed four offsetting transactions
6 during the first week of September 2013 to close out the open positions for the
7 remaining 11 transactions from the record period. Therefore, all non-compliant
8 2012 transactions positions have been closed and a resulting net gain of
9 \$416,122, net of broker and exchange fees, will be realized. PG&E closed out
10 these open positions to eliminate the risk that market movement would result in
11 the remaining transactions settling at a loss.

12 The table below includes a summary of the 48 non-compliant transactions,
13 including the notional value of settlements related to the 37 expired transactions,
14 and the 4 offsetting transactions that were entered into in September 2013 to
15 eliminate market risk exposure for the remaining 11 unexpired transactions. A
16 detailed list of the transactions is included in Confidential Attachment B.
17 Confidential Attachment C includes the transactions included in the original QCR
18 submittals, by quarter.

Transaction Summary			
Trade Type	Number of Trades	Delivery Period Covered	Notional Value
Futures (buy)	48	January 1, 2013 through December 31, 2014	(\$19,022,078)
Futures (settled)	37	January 1, 2013 through August 31, 2013	10,952,467
Futures (sell)	4	January 1, 2014 through December 31, 2014	8,493,393
		Execution Fees	(7,660)
		Net Settled Gain	\$416,122

19 **C. Controls to Ensure Future Transactions Are in Compliance With Hedging**
20 **Limits**

21 Since discovering the non-compliant transactions, PG&E has implemented
22 additional procedural controls that will prevent the reoccurrence of this issue and
23 is updating its electronic model to include all provisions (constraints and limits) in
24 the Hedging Plan. This model has already been modified to include the limit that

1 would have prevented the execution of the non-compliant trades discussed here
2 and was modified to correct a minor calculation error. This model, which is
3 maintained by a team of quantitative analysts in PG&E's Market Risk
4 Management Department, will also be reviewed by a separate, independent
5 team of qualified analysts in the same department.

6 While this model uses Microsoft Excel to provide an interactive report to
7 PG&E's gas traders, generation of the report and the formulas in the report are
8 embedded in computer code. The report is automatically generated every night
9 to update the model for market prices and portfolio positions. PG&E's gas
10 traders do not have the ability to access or modify this code. Once the code is
11 updated as described above and reviewed by the independent team, the code
12 will be placed into production and "locked" from modification through password
13 protection. In addition to updating the model, PG&E is also updating its change
14 control process and verifying security for this model.

15 While use of an electronic model to guide implementation of the hedging
16 plan is a preventative control, as a result of the non-compliant trades PG&E is
17 adding a detective control to its management of hedging plan implementation.
18 PG&E has developed a compliance report that will demonstrate that each of
19 PG&E's gas financial trades complied with each of the provisions of its Hedging
20 Plan. PG&E has provided copies of these reports for all financial trades
21 executed in 2012 as confidential workpapers accompanying this testimony.
22 PG&E will generate these reports frequently in order to detect any deviation from
23 its approved Hedging Plan, which will allow PG&E's management to prevent
24 reoccurrence of an ongoing case of non-compliance similar to that discussed
25 here. PG&E will begin providing these reports with its Quarterly Compliance
26 Reports beginning Q4-2013 and will include a complete set of these reports in
27 support of its 2013 ERRA Compliance Application.

28 **D. Request for Commission Approval**

29 PG&E requests the Commission approve: (1) the 48 non-complaint
30 transactions executed in 2012; (2) the four transactions executed in
31 September 2013 to offset and close out the unexpired 2012 transactions; and
32 (3) retention of the net gain the ERRA balancing account.

PACIFIC GAS AND ELECTRIC COMPANY
PHASE 2 TESTIMONY
ATTACHMENT A
ELECTRIC PORTFOLIO HEDGING PLAN: DESCRIPTION OF
OPERATING TARGET LIMITS
[THIS DOCUMENT IS CONFIDENTIAL]

PACIFIC GAS AND ELECTRIC COMPANY
PHASE 2 TESTIMONY
ATTACHMENT B
LIST OF TRANSACTIONS
[THIS DOCUMENT IS CONFIDENTIAL]

**PACIFIC GAS AND ELECTRIC COMPANY
PHASE 2 TESTIMONY
ATTACHMENT C
TRANSACTIONS PRESENTED IN THE
2012 QUARTERLY COMPLIANCE REPORTS
[THIS DOCUMENT IS CONFIDENTIAL]**

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

**DECLARATION OF PETER E. KOSZALKA
SEEKING CONFIDENTIAL TREATMENT OF PG&E'S ADVICE 4302-E REGARDING
2012 QUARTERLY COMPLIANCE REPORTS FOR QUARTER 1 (ADVICE 4033-E-A),
QUARTER 2 (ADVICE 4091-E-A) AND QUARTER 3 (ADVICE 4132-E-A) –
FINANCIAL GAS TRANSACTIONS NOT IN COMPLIANCE WITH BUNDLED
PROCUREMENT PLAN**

I, Peter E. Koszalka, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee since 2003 (and was previously employed by PG&E from 1983 to 1998). My current title is Director, Electric Gas Supply. In this position, my responsibilities include physical and financial trading of gas in support of PG&E's allocated DWR contracts, PG&E's company-owned generating facilities, and PG&E's tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved.

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 Confidential Attachment A or Advice 4302-E regarding financial gas transactions not in compliance with bundled procurement plan appearing in the 2012 Quarterly Compliance Reports for Quarter 1 (Advice 4033-E-A), Quarter 2 (advice 4091-E-A) and Quarter 3 (Advice 4132-E-A).

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 I of D.06-06-066 and Appendix D.08-04-023 (the “IOU Matrix”), and/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, 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; (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 that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on October 14, 2013 at San Francisco, California.

/s/

PETER E. KOSZALKA

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
ADVICE 4302-E**

**FINANCIAL GAS TRANSACTIONS NOT IN COMPLIANCE WITH BUNDLED PROCUREMENT PLAN
AS REPORTED IN THE 2012 QUARTERLY COMPLIANCE REPORTS FOR
QUARTER 1 (ADVICE 4033-E-A), QUARTER 2 (ADVICE 4091-E-A) AND QUARTER 3 (ADVICE 4132-E-A)**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

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 (Y/N)	2) Which category or categories in the Matrix the data corresponds 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
Document: Confidential Attachment A (referencing PG&E's 2012 ERRA Compliance Review Phase 2 Testimony)							
Attachment A	Y	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Y	N	Y	Description of PG&E's long term buying and hedging strategies, which constitutes market sensitive information.	Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.
Attachment B	Y	Item I) A) 4) Long-term fuel (gas) buying and hedging plans XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	Transactions conducted under PG&E's hedging Plan. This information reveals monthly procurement costs and is market sensitive information with regard to hedging transactions.	Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.
Attachment C	Y	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Y	N	Y	Transactions conducted under PG&E's hedging Plan. This information reveals monthly procurement costs and is market sensitive information with regard to hedging transactions.	Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.

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

1st Light Energy	Douglass & Liddell	OnGrid Solar
AT&T	Downey & Brand	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Praxair
Anderson & Poole	G. A. Krause & Assoc.	Regulatory & Cogeneration Service, Inc.
BART	GenOn Energy Inc.	SCD Energy Solutions
Barkovich & Yap, Inc.	GenOn Energy, Inc.	SCE
Bartle Wells Associates	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Braun Blasing McLaughlin, P.C.	Green Power Institute	SPURR
CENERGY POWER	Hanna & Morton	San Francisco Public Utilities Commission
California Cotton Ginners & Growers Assn	In House Energy	Seattle City Light
California Energy Commission	International Power Technology	Sempra Utilities
California Public Utilities Commission	Intestate Gas Services, Inc.	SoCalGas
California State Association of Counties	Kelly Group	Southern California Edison Company
Calpine	Linde	Spark Energy
Casner, Steve	Los Angeles Dept of Water & Power	Sun Light & Power
Center for Biological Diversity	MAC Lighting Consulting	Sunshine Design
City of Palo Alto	MRW & Associates	Tecogen, Inc.
City of San Jose	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Clean Power	Marin Energy Authority	TransCanada
Coast Economic Consulting	McKenna Long & Aldridge LLP	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
County of Tehama - Department of Public Works	Modesto Irrigation District	Utility Specialists
Crossborder Energy	Morgan Stanley	Verizon
Davis Wright Tremaine LLP	NLine Energy, Inc.	Water and Energy Consulting
Day Carter Murphy	NRG Solar	Wellhead Electric Company
Defense Energy Support Center	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	North America Power Partners	
Division of Ratepayer Advocates	Occidental Energy Marketing, Inc.	