

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 4, 2014

**Advice Letter 4352-E, 4352-E-A, 4352-E-B, and 4352-E-C**

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

**SUBJECT: 2013 Q4 Procurement Transaction Quarterly Compliance Filing**

Dear Ms. Allen:

Advice Letters 4352-E, 4352-E-A, 4352-E-B, and 4352-E-C are effective as of October 17, 2014.

Sincerely,

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

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

June 6, 2014

**Advice 4352-E-A**  
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Procurement Transaction Quarterly Compliance Filing (Q4 2013) – Supplemental Filing**

Pacific Gas and Electric Company (“PG&E”) is submitting to the California Public Utilities Commission (“Commission” or “CPUC”) revised confidentiality declarations and matrix filed in support of its fourth quarter Procurement Transaction Quarterly Compliance Report (“QCR”), Confidential Attachments E, F, G, H, K and L for record period October 1, 2013 through December 31, 2013 (Quarter 4 2013). The revised confidentiality declarations and matrix address the confidential treatment for materials provided in support of Greenhouse Gas (GHG) procurement activity for Q4-2013. Please note the declarations and matrices, included in the initial filing, which address the confidentiality treatment for materials provided in support of non-GHG procurement activity remain unchanged.

### **Background**

The California Air Resources Board (“CARB”) created a cap-and-trade program and promulgated regulations in Title 17 of the California Code of Regulations (“CCR”) governing the program, including the related GHG compliance instrument auction (the “Regulation”).<sup>1</sup> The Regulation prohibits the release of certain information identified as confidential.<sup>2</sup>

Certain information contained in Confidential Attachments E, F, G, H, K and L is confidential under the Regulation. The disclosure of that information would violate the Regulations. PG&E had originally requested that this information be maintained as confidential for periods of either one or three years. However, based on the Regulation, PG&E is revising its confidentiality request so that this information be held confidential

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<sup>1</sup> 17 CCR §§ 95801 et seq.

<sup>2</sup> 17 CCR § 95912 (f) and 17 CCR § 95914 (c).

for an indefinite period consistent with General Order 66-C. PG&E is providing revised declarations, which are attached to this supplemental filing as Attachment 1, to reflect the change in the confidentiality period.

### **Compliance Items**

PG&E's Confidential QCR included supporting Confidential Attachments E, F, G, H, K and L as follows:

- Attachment E – Fourth Quarter 2013 Other Transactions
- Attachment F – Fourth Quarter 2013 Key Briefing Packages
- Attachment G – Fourth Quarter 2013 Independent Evaluator Reports
- Attachment H – Fourth Quarter 2013 New Contracts Executed/Contracts Amended
- Attachment K – Risk Management Strategy Communication and Management Disclosure
- Attachment L – Reasonable Number of Analyses Models, Description of Models, and How Models Operate

Attachment 1 to this Advice Letter includes revised confidentiality declarations and matrix for Sharon Tatai and Marianne Cocard-Aikawa.

### **Protests**

Anyone wishing to protest this supplemental filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than June 26, 2014, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> 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:

Brian K. Cherry  
Vice President, 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, Rule 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, Rule 3.11).

### **Effective Date**

The requested effective date of this Tier 2 advice letter is July 6, 2014, which is 30 days after the date of filing.

### **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 lists for Rulemaking ("R.") 12-03-014, R.01-10-024, and R.11-10-023. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail 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>.

Handwritten signature of Brian Cherry in cursive, with a stylized 'B' and 'C'.

Vice President, Regulatory Relations

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

Public Attachment: Attachment 1 – Confidentiality Declarations and Matrix

# 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: **Shirley Wong**

Phone #: **(415) 972-5505**

E-mail: **slwb@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) #: **4352-E-A**

Tier: **2**

Subject of AL: **Procurement Transaction Quarterly Compliance Filing (Q4 2013) – Supplemental Filing**

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 #: 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. Please see Attachment 1, Confidentiality Declarations and Matrix.**

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: **July 6, 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:

Service affected and changes proposed:

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  
ED Tariff Unit  
505 Van Ness Ave., 4<sup>th</sup> 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

**Advice 4352-E-A**

**June 6, 2014**

**ATTACHMENT 1**

**CONFIDENTIALITY DECLARATIONS AND MATRIX**

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

**DECLARATION OF MARIANNE AIKAWA  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S ADVICE LETTER 4352-E REGARDING  
CONFIDENTIAL ATTACHMENT E, H AND L**

I, Marianne Aikawa, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1989. My current title is Senior Manager within PG&E's Energy Procurement organization. In this position my responsibilities include reviewing regulatory reports. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. Through this experience, I have become familiar with the type of information that would affect the regulatory filing, as well as with the type of information that would be considered 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 PG&E's January 30, 2014 Advice Letter 4352-E, Confidential Attachments E, H and L.
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 also specifies that the information is not already public and/or cannot be reasonably redacted, and that 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 June 6, 2014, at San Francisco, California.

\_\_\_\_\_/s/\_\_\_\_\_  
Marianne Aikawa  
Senior Manager  
Energy Compliance and Reporting  
Energy Procurement  
PACIFIC GAS AND ELECTRIC COMPANY

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

**DECLARATION OF SHARON K. TATAI  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S ADVICE LETTER 4352-E REGARDING  
CONFIDENTIAL ATTACHMENTS F, G, AND K**

I, Sharon K. Tatai, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1980. My current title is Manager within PG&E's Energy Procurement organization. In this position, my responsibilities include review of regulatory reports and managing PG&E's Procurement Review Group and Independent Evaluator program. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. Through this experience, I have become familiar with the type of information that would affect the regulatory filing, as well as with the type of information that would be considered 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 PG&E's January 30, 2014 Advice Letter 4352-E, Confidential Attachments F, G, and K.
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 also specifies that the information is not already public and/or cannot be reasonably

redacted, and that 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 June 6, 2014, at San Francisco, California.

\_\_\_\_\_/s/\_\_\_\_\_  
Sharon K. Tatai  
Manager  
Energy Compliance and Reporting  
Energy Procurement  
PACIFIC GAS AND ELECTRIC COMPANY

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
PROPOSAL REGARDING ADVICE LETTER 4352-E-A  
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER FOUR 2013  
June 6, 2014**

**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
<b>Document: Attachment 1</b>							
Attachment E – Other Transactions-GHG Information and GHG Offset Credit RFO	N	CPUC General Order (G.O.) 66-C	N/A	N	Y	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.  This information also includes confidential business information protected under G.O. 66-C.	Indefinite
Attachment F – PRG Material-GHG Information	N	G.O. 66-C	N/A	N	Y	Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.	Indefinite
Attachment G – Independent Evaluator Reports-GHG Offset Credit RFO Information	N	G.O. 66-C	N/A	N	Y	This information includes confidential business information protected under G.O. 66-C.	Indefinite
Attachment H – Executed Contracts-	N	G.O. 66-C	N/A	N	Y	This information includes confidential business information protected under G.O.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
PROPOSAL REGARDING ADVICE LETTER 4352-E-A  
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER FOUR 2013  
June 6, 2014**

**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
GHG Offset Credit RFO						66-C.	
Attachment K – Risk Management-GHG Information and the GHG Offset Credit RFO	N	G.O. 66-C	N/A	N	Y	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.  This information also includes confidential business information protected under G.O. 66-C.	Indefinite
Attachment L – Reasonable Number of Analyses-GHG Information and GHG Offset Credit RFO	N	G.O. 66-C	N/A	N	Y	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.  This information also includes confidential business information protected under G.O. 66-C.	Indefinite

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

AT&T	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
CENERGY POWER	Green Power Institute	SDG&E and SoCalGas
California Cotton Ginners & Growers Assn	Hanna & Morton	SPURR
California Energy Commission	In House Energy	San Francisco Public Utilities Commission
California Public Utilities Commission	International Power Technology	Seattle City Light
California State Association of Counties	Intestate Gas Services, Inc.	Sempra Utilities
Calpine	K&L Gates LLP	SoCalGas
Casner, Steve	Kelly Group	Southern California Edison Company
Center for Biological Diversity	Linde	Spark Energy
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
City of San Jose	Los Angeles Dept of Water & Power	Sunshine Design
Clean Power	MRW & Associates	Tecogen, Inc.
Coast Economic Consulting	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Commercial Energy	Marin Energy Authority	TransCanada
Cool Earth Solar, Inc.	McKenna Long & Aldridge LLP	Utility Cost Management
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Utility Specialists
Davis Wright Tremaine LLP	Morgan Stanley	Verizon
Day Carter Murphy	NLine Energy, Inc.	Water and Energy Consulting
Defense Energy Support Center	NRG Solar	Wellhead Electric Company
Dept of General Services	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Division of Ratepayer Advocates	North America Power Partners	