

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 26, 2015

Advice Letter 4531-E

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: Submittal of ESP Financial Security Requirements in Compliance with
D.13-01-021, D.13-02-017, and D.13-04-001**

Dear Ms. Allen:

Advice Letter 4531-E is effective as of December 10, 2014.

Sincerely,

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

Edward Randolph
Director, Energy Division



Meredith Allen
Senior Director
Regulatory Relations

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

Fax: 415.973.6520

November 10, 2014

Advice 4531-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Submittal of Electric Service Provider (ESP) Financial Security Requirements in Compliance With D.13-01-021, D.13-02-017, and D.13-04-001

Pacific Gas and Electric Company (PG&E) hereby submits its calculation of the financial security requirements for the Electric Service Providers (ESPs) serving customers within its service territory.

Purpose

In compliance with Ordering Paragraph (OP) 6 of Decision (D.) 13-01-021¹, this advice filing is to provide the California Public Utilities Commission (CPUC or Commission) with the updated ESP financial security requirements.

Background

On January 24, 2013, the Commission issued D.13-01-021, which adopted a methodology to derive incremental procurement costs for the financial security requirement and re-entry fees for an involuntary return of Direct Access (DA) residential and small commercial customers. On February 25, 2013, the Commission issued D.13-02-017 and, on April 2, 2013, the Commission issued D.13-04-001. These two decisions corrected inadvertent technical errors in D.13-01-021.

OP 6 of D.13-01-021 requires the Investor Owned Utilities to update the applicable ESP financial security amounts by the 10th of May and November of each year and to submit them in a Tier 2 Advice Letter.

¹ As corrected by D.13-02-017, issued on February 25, 2013, and D.13-04-001, issued on April 2, 2013.

Attachment B contains a table showing, by ESP, the calculated financial security amount based upon the methodology adopted in Appendix 1 of D.13-01-021. The table has been redacted of any confidential ESP information. An unredacted version with the relevant supporting data and calculation of each respective ESP's financial security amount will be filed under confidential seal to the Energy Division. A declaration supporting confidential treatment is found in Attachment A.

The version of this advice letter posted at www.pge.com is redacted.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 1, 2014, which is 21² days from the date of this filing. Protests should 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 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 E-mail or U.S. Mail (and by facsimile, 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
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
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

² The 20-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.

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).

Effective Date

PG&E requests that this Tier 2 advice filing become effective on regular notice, December 10, 2014, which is 30 calendar days after the date of 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 list for Rulemaking (R.) 07-05-025. Address changes to the General Order 96-B service list should be directed to PG&E at email address 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: Service List R.07-05-025

Attachments:

Attachment A – Declaration of Ronald Jang supporting confidential treatment
Confidential Attachment B – ESP Financial Security Requirement
(Redacted copy provided in public version)

Attachment A
Declaration of Ronald Jang
Seeking Confidential Treatment

**DECLARATION OF RONALD JANG
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN ADVICE LETTER 4531-E
(PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)**

I, Ronald Jang, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee at PG&E since 1977. My current title is Principal Account Manager within PG&E's Customer Impact organization. In this position, my responsibilities include maintaining the on-going business relationship with third-party electric service providers (ESPs) participating in PG&E's direct access service program. In carrying out these responsibilities, I have acquired knowledge of the operations of electric service providers in general. Through this experience, I have become familiar with the type of information ESPs' consider confidential and proprietary.

2. Based on my knowledge and experience, I make this declaration seeking confidential treatment of "Attachment B to Advice Letter 4531-E," submitted on November 10, 2014. By this Advice Letter, PG&E is seeking this Commission's approval of its calculations of the financial security requirements for individual ESPs in compliance with Ordering Paragraph 6 of Decision 13-01-021.

3. PG&E is seeking confidential treatment of the number of customers served by each ESP, historic usage information, forecasted electric pricing information, and the calculated financial security requirement. The material PG&E is seeking to protect constitutes information that should be protected under Public Utilities Code § 583 and General Order 66-C. Finally, PG&E states 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.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on November 10, 2014 at San Francisco, California.

/s/ Ronald O. Jang
Ronald O. Jang

ATTACHMENT B
Redacted Public Version

ESP FINANCIAL SECURITY REQUIREMENT	
Pacific Gas and Electric Company	
November 10, 2014	
Electric Service Provider	
Electric Service Provider	Total Financial Security
3phases Renewables LLC	
Calpine Power America LLC	
Commerce Energy	
Commercial Energy of Montana, Inc	
Constellation Newenergy, Inc	
Direct Energy Business LLC	
EDF Industrial Power Services (CA), LLC	
Gexa Energy of California Inc	
Glacial Energy of California Inc	
Liberty Power Holdings LLC	
Noble Americas Energy Solutions LLC	
Pilot Power Group Inc	
Shell Energy North America (US) LP	
Tiger, Inc.	

**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	