December 30, 2014

Advice Letter 4546-E and 4546-E-A

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: Modifications to PG&E’s 2014 Renewables Portfolio
Standard Procurement Plan and Supplemental

Dear Ms. Allen:

Advice Letter 4546-E and 4546-E-A are effective December 23, 2014.

Sincerely,

Edward Randolph
Director, Energy Division
December 8, 2014

Advice 4546-E
(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

Subject: Modifications to PG&E’s 2014 Renewables Portfolio Standard Procurement Plan

I. Purpose


II. Background

Ordering Paragraph 11 of the Decision provides as follows:

In the final Renewables Portfolio Standard (RPS) Procurement Plans filed pursuant to the schedule adopted herein, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall obtain Commission approval to change the material included in their Plan after the Commission approves the RPS Procurement Plans under Section 399.13(a)(1). After the Plans are approved by the Commission, the utilities may seek Commission approval to correct typographical errors, clarify requirements, incorporate directives from the Commission, or other non-material revisions via a Tier 1 Advice Letter.

In compliance with this order, PG&E is submitting this Advice Letter to describe and seek the Commission’s approval for the changes PG&E is making in its final 2014 Renewable Energy Procurement Plan (“Final 2014 RPS Plan”), which PG&E is filing in Rulemaking (“R.”) 11-05-005 concurrently with the submission of this Advice Letter.

PG&E’s Final 2014 RPS Plan includes both clean and redlined versions of the Final 2014 RPS Plan, with the redline showing changes from the Draft 2014 RPS Plan filed on June 4, 2014 and

1/ See Final 2014 RPS Plan, filed in R.11-05-005 on December 8, 2014, Appendix I (redline of 2014 RPS Solicitation Protocol, including the 2014 Form RPS PPA); id. Appendix A (redline of the 2014 RPS Plan, including Appendices D and G).
updated on August 20, 2014. Thus, the redlines show all changes made subsequent to, and in compliance with, the Commission’s conditional approval of the draft 2014 RPS Plan on November 24, 2014. While PG&E has sought to list significant or material changes generally in the table included in this Advice Letter, PG&E refers to and incorporates by reference into this Advice Letter the complete redlines included with its Final 2014 RPS Plan in order to show all non-material changes and those that clarify requirements. PG&E has not attached the Final 2014 RPS Plan again to this Advice Letter in order to avoid unnecessary redundancy.

III. Changes to Final 2014 RPS Plan Documents

The following table generally describes the changes made in the Final 2014 RPS Plan for which PG&E seeks approval, provides document and section references for those changes, and notes the type of change in each instance that allows for it to be considered by Tier 1 Advice Letter.

<table>
<thead>
<tr>
<th>Final 2014 RPS Plan Document and Page Reference</th>
<th>General Description of Change</th>
<th>Category of Change Pursuant to D.14-11-042, OP 11</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 Plan, Section 9.2; 2014 Protocol, Sections VI.C., VIII.B.</td>
<td>Clarified that bidders must provide both primary and secondary offers that include varying levels of economic curtailment rights.</td>
<td>Compliance with requirement in OP 20 of D.14-11-042</td>
</tr>
<tr>
<td>2014 Protocol, Section IV.E., Attachment J1</td>
<td>Bidding requirement that “application deemed complete” by lead CEQA/NEPA agency.</td>
<td>Compliance with OP 21 of D.14-11-042</td>
</tr>
<tr>
<td>2014 RPS Plan, Sections 1, 3.3.1, 9.2, 9.3; 2014 Protocol, Section VIII.A. and Attachment K</td>
<td>Incorporated and described interim integration cost adder</td>
<td>Compliance with OP 23 of D.14-11-042</td>
</tr>
<tr>
<td>2014 Protocol at Section III.A.</td>
<td>Incorporated requirement to file advice letters within 90 days of Power Purchase Agreement (“PPA”) execution</td>
<td>Compliance with OP 26 of D.14-11-042</td>
</tr>
</tbody>
</table>

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2/ PG&E’s June 4, 2014 Draft 2014 RPS Plan filed in R.11-05-005 included a redline showing changes from PG&E’s Final 2013 RPS Plan. Accordingly, the record of the proceeding includes redlines showing all changes between the Final 2013 RPS Plan and the Final 2014 RPS Plan.
<table>
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<tr>
<td>2014 Plan, Section 15.2.2</td>
<td>Added description of Renewable Auction Mechanism (“RAM”)</td>
<td>Compliance with OP 31 of D.14-11-042</td>
</tr>
<tr>
<td>2014 Plan at Sections 2.9, 15.2.1</td>
<td>Added description of termination of Photovoltaic (“PV”) Program and transfer of volumes to RAM</td>
<td>Compliance with OP 32 of D.14-11-042</td>
</tr>
<tr>
<td>2014 Protocol, Attachment K</td>
<td>Clarified description of curtailment adjustment; updated congestion and loss multipliers.</td>
<td>Compliance with D.14-11-042, p. 44; clarify requirements</td>
</tr>
<tr>
<td>2014 Protocol, Attachment J3</td>
<td>Clarified bidding requirements to ensure PG&amp;E can comply with new GIS data adequacy requirement</td>
<td>Compliance with D.14-11-042, pp. 81-82.</td>
</tr>
<tr>
<td>2014 Plan, Appendix C (Renewable Net Short tables)</td>
<td>Added new Appendices C.3 and C.4 to show PG&amp;E’s most recent internal forecast of retail sales; Updated Appendices C.1 and C.2 to account for contract terminations, updated methodology to categorize “online” projects, and updated project viability assessments</td>
<td>Clarify requirements</td>
</tr>
<tr>
<td>2014 Plan, Sections 1, 3.6.1, 2.7, 9.1.1; 2014 Protocol, Sections 1.A., VIII.B.</td>
<td>Clarified that 2014 RPS Solicitation procurement target is between zero and 1,600 GWh per year of incremental deliveries</td>
<td>Clarify requirements</td>
</tr>
<tr>
<td>2014 Plan at Sections 1, 2.1, 14.1, 17; added identical footnotes in many sections of the 2014 Plan referencing new Section 17; 2014 Protocol, Section 1.A.</td>
<td>Added description of how PG&amp;E’s most recent internal retail sales forecast impacts PG&amp;E’s portfolio optimization strategy and incremental procurement targets</td>
<td>Clarify requirements</td>
</tr>
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<tr>
<td>2014 Plan, Sections 2.12.4, 9.2; 2014 Protocol, Sections I.A, VII.A., VII.D., and Attachment D1</td>
<td>Deleted language allowing bids to include storage that is capable of charging directly from the grid. Requested more detailed information regarding storage bids in Attachment D1.</td>
<td>Clarify requirements.</td>
</tr>
<tr>
<td>2014 Protocol, Section IV.D</td>
<td>Added language clarifying what interconnection study requirements apply to integrated storage components.</td>
<td>Clarify requirements.</td>
</tr>
<tr>
<td>2014 Protocol, Section IV.D and Attachment D1</td>
<td>Clarified that PG&amp;E will accept offers for resources with Partial Capacity Deliverability Status and what requirements apply to such bids.</td>
<td>Clarify requirements.</td>
</tr>
<tr>
<td>2014 Protocol, Section IV.D.</td>
<td>Clarified that bids must be for resources that will obtain a wholesale interconnection agreement.</td>
<td>Clarify requirements.</td>
</tr>
<tr>
<td>2014 Plan, Sections 1, 3.6.1, 5.5.1, 5.5.4, 9.1.1, 9.2; 2014 Protocol, Sections I.A., and VIII.B.</td>
<td>Updated bid eligibility requirements to require, rather than prefer, online date in 2020 or later; clarify that later online dates are preferred in light of most recent internal retail sales forecast.</td>
<td>Clarify requirements.</td>
</tr>
<tr>
<td>2014 Protocol, Section XII.</td>
<td>Clarified that PG&amp;E may ask shortlisted participants for additional information.</td>
<td>Clarify requirements.</td>
</tr>
<tr>
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<tr>
<td>2014 Form RPS PPA, Attachment H1 to 2014 Protocol (“Form PPA”) - Section 1.22 - “Buyer Bid Curtailment” definition</td>
<td>Clarified definition that if an as-available resource is dispatched below forecast as a result of an economic bid for the resource, this constitutes Buyer Bid Curtailment. Also clarified that any derate on the project is subtracted from availability before the Buyer Bid Curtailment value is determined.</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA - 1.51 - “Contract Quantity” definition</td>
<td>Clarified that Appendix V specifies the value(s) of Contract Quantity for each contract year</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA 1.59 - “Curtailment Order” definition</td>
<td>Clarified that California Independent System Operator (“CAISO”) advance over-generation warning constitutes a Curtailment Order; and any instruction to decrease output after an energy schedule clears represents a Curtailment Order.</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA 1.73 - “Delivered Energy” definition</td>
<td>Clarified definition that Delivered Energy must be based on CAISO Tariff-required power factor</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA 1.155 - “Interconnection Point” definition</td>
<td>Updated that Interconnection Point is also identified in Appendix IV</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA 1.172 -“Minimum Down Time” definition</td>
<td>Definition added to allow Seller to specify this operational limitation, if applicable</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA 1.206 -“PMAX” definition</td>
<td>Definition added to allow Seller to specify this operational limit, if applicable</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA 1.215 - “Project Specifications” definition</td>
<td>Definition added. Term described in Section 3.1(g)</td>
<td>Authorized by OP 15 of D.14-11-042</td>
</tr>
<tr>
<td>Form PPA 3.1(f) - Seller’s and Buyer’s Obligations, Contract Capacity</td>
<td>Clarified that Contract Capacity must be calculated using the methodology in Appendix IV</td>
<td>Clarify Requirements</td>
</tr>
<tr>
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</tr>
<tr>
<td>2014 Plan, Section 9.2; Form PPA 3.1(g) - Seller’s and Buyer’s Obligations, Project</td>
<td>Added definition for “Project Specifications” to clarify that the integral components of the Project must be identified in Appendix IV. Included language that PG&amp;E’s consent required for changes to Project Specifications that may result in a change to Contract Capacity.</td>
<td>Authorized by OP 15 of D.14-11-042</td>
</tr>
<tr>
<td>Form PPA 3.1(o) - Seller’s and Buyer’s Obligations, Curtailment Requirements</td>
<td>Clarified that Buyer Bid Curtailment intervals may not necessarily occur consecutively Clarified that uncapped Buyer Bid Curtailment is the primary offer variation</td>
<td>Clarify Requirements; Compliance with requirement in OP 20 of D.14-11-042 that PG&amp;E offer at least two curtailment bid variants.</td>
</tr>
<tr>
<td>Form PPA 4.1(b) - Price, Deemed Delivered Energy Price</td>
<td>Clarified that Deemed Delivered Energy Price is equal to Contract Price. (per R.11-05-005 expired PTC not to be factored into Deemed Delivered Energy Price)</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA, Appendix IV - Project Specifications and Contract Capacity Calculation</td>
<td>Added more detailed Project Description to facilitate Buyer and Seller when Buyer reviews Seller’s proposed Project changes</td>
<td>Authorized by OP 15 of D.14-11-042</td>
</tr>
<tr>
<td>Form PPA, Appendix XV - Buyer Bid Curtailment and Buyer Curtailment Orders</td>
<td>Reiterated that unlimited Buyer Bid Curtailment is the standard. For clarification, added Minimum Down Time as an operational characteristic</td>
<td>Clarify Requirements</td>
</tr>
<tr>
<td>Form PPA, Appendix XVII - Supplier Diversity Program; 2014 Protocol, Section VIII.F.</td>
<td>Added Lesbian, Gay, Bisexual and/or Transgender (&quot;LGBT&quot;) as eligible for the Supplier Diversity Program, consistent with CPUC General Order 156.</td>
<td>Clarify Requirements</td>
</tr>
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</table>
IV. Request for Commission Approval

PG&E requests the Commission approve the modifications to PG&E’s Final 2014 RPS Procurement Plan through issuance of an Energy Division disposition letter approving this Advice Letter. PG&E requests that the Energy Division issue its disposition letter prior to the issuance of the 2014 RPS Solicitation on December 18, 2014.

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 29, 2014, which is 21 days\(^{1/2}\) after the date of this filing. Protests must 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 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:

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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 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, Section 3.11).

\(^{1/2}\) The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.
IV. Tier Designation

PG&E is designating this as a Tier 1 Advice Letter, in accordance with D.14-11-042.

V. Effective Date

Pursuant to General Order 96-B, this advice letter will be effective pending disposition.

VI. 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 R.11-05-005. Address changes to the General Order 96-B list and 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.

/S/
Meredith Allen
Senior Director – Regulatory Relations

cc: Paul Douglas – Energy Division
Cheryl Lee – Energy Division
Service List for R.11-05-005
**Company name/CPUC Utility No.** Pacific Gas and Electric Company (ID U39 E)  

<table>
<thead>
<tr>
<th>Utility type</th>
<th>Contact Person</th>
<th>Phone #</th>
<th>E-mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ ELC</td>
<td>Jennifer Wirowek</td>
<td>(415) 973-1419</td>
<td><a href="mailto:j6ws@pge.com">j6ws@pge.com</a> and <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
</tr>
<tr>
<td>☐ GAS</td>
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<td></td>
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<tr>
<td>☐ PLC</td>
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<tr>
<td>☐ HEAT</td>
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<tr>
<td>☐ WATER</td>
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</table>

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

**Advice Letter (AL) #:** 4546-E  
**Tier:** 1

**Subject of AL:** Modifications to PG&E’s 2014 Renewables Portfolio Standard Procurement Plan

**Keywords (choose from CPUC listing):** Contracts, Portfolio

**AL filing type:** ☑ One-Time

**If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:** D.14-11-042

**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: N/A

**Confidential information will be made available to those who have executed a nondisclosure agreement:** ☐ Yes  ☐ No

**N/A**

**Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information:** N/A

**Resolution Required?** ☐ Yes  ☑ No

**Requested effective date:** December 8, 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 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

<table>
<thead>
<tr>
<th>California Public Utilities Commission</th>
<th>Pacific Gas and Electric Company</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Energy Division</strong></td>
<td>Attn: Meredith Allen</td>
</tr>
<tr>
<td><strong>EDTariffUnit</strong></td>
<td>Senior Director, Regulatory Relations</td>
</tr>
<tr>
<td>505 Van Ness Ave., 4th Flr.</td>
<td>77 Beale Street, Mail Code B10C</td>
</tr>
<tr>
<td>San Francisco, CA 94102</td>
<td>P.O. Box 770000</td>
</tr>
<tr>
<td>E-mail: <a href="mailto:EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a></td>
<td>San Francisco, CA 94177</td>
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<tr>
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<td>E-mail: <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
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</tbody>
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1 The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.
PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV

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