

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 29, 2015

Advice Letter 4626-E and 4626-E-A

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**Subject: Procurement Transaction Quarterly Compliance Filing (Q1, 2015)
and Supplemental Filing**

Dear Mr. Jacobson:

Advice Letter 4626-E and 4626-E-A are effective May 30 , 2015.

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: 415-973-7226

April 30, 2015

Advice 4626-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Procurement Transaction Quarterly Compliance Filing (Q1, 2015)

Pacific Gas and Electric Company ("PG&E") hereby submits to the California Public Utilities Commission ("Commission" or "CPUC") its compliance filing for the first quarter of 2015 in conformance with PG&E's Bundled Procurement Plan ("BPP") approved by the Commission in Decision ("D.") 12-01-033 and D.12-04-046. PG&E's submittal of this Procurement Transaction Quarterly Compliance Report ("QCR") for record period January 1, 2015 through March 31, 2015, (Q1-2015) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Quarterly Procurement Plan Compliance Reports be submitted within 30 days of the end of the quarter.

Background

In D.07-12-052, the Commission directed Energy Division and the Investor-Owned Utilities ("IOUs") to continue the collaborative effort to develop a reformatted QCR. The Commission authorized Energy Division to implement a reformatted QCR and to make ministerial changes to the content and format of the report as needs arise. Energy Division and the IOUs finalized the QCR format in December 2008. This QCR is consistent with the final format authorized by Energy Division on December 15, 2008.

Compliance Items

Attachment 1 to this QCR includes a narrative with supporting Confidential Attachments that conforms to the reformatted QCR. The public version of Attachment 1 includes the Narrative, which is not confidential. Attachment 2 includes the public version of Attachment H. The confidential version of this QCR includes the following supporting Confidential Attachments:

- Attachment A – First Quarter 2015 Electric and Natural Gas Transactions
- Attachment B – First Quarter 2015 Counter-Party Information
- Attachment C – First Quarter 2015 Electric Transactions Summary
- Attachment D – First Quarter 2015 Natural Gas Transactions Summary

- Attachment E – First Quarter 2015 Other Transactions
- Attachment F – First Quarter 2015 Key Briefing Packages
- Attachment G – First Quarter 2015 Independent Evaluator Reports
- Attachment H – First Quarter 2015 New Contracts Executed/Contracts Amended
- Attachment I – Summary of Retained Generation Investments Completed During First Quarter 2015
- Attachment J – System Load Requirements/Conditions
- Attachment K – Risk Management Strategy Communication and Management Disclosure
- Attachment L – Reasonable Number of Analyses Models, Description of Models, and How Models Operate
- Attachment M – Transactions Subject to Strong Showing for the First Quarter

Attachment 3 to this QCR includes confidentiality declarations and matrix.

The public version of this QCR is provided to the service lists for Rulemaking (“R.”) 12-03-014, R.01-10-024, R.11-10-023. The confidential version of this QCR is provided to PG&E’s Procurement Review Group.

The filing would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than May 20, 2015, 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, 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, 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

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is May 30, 2015, 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 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>.

/S/

Meredith Allen
Senior Director, Regulatory Relations

cc: Service List R.12-03-014, R.01-10-024, R.11-10-023 (Public Version)
PG&E's Procurement Review Group (Confidential Version)

Public Attachments: Attachment 1 – Narrative
Attachment 2 – Attachment H (Public Version)
Attachment 3 – 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: Jennifer Wirowek

Phone #: (415) 973-1419

E-mail: J6ws@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) #: **4626-E**

Tier: **2**

Subject of AL: **Procurement Transaction Quarterly Compliance Filing (Q1, 2015)**

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 #: D.12-01-033, D.12-04-046 and D.03-12-062

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 attached Confidentiality Declarations 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: Jay Bukowski, (415) 973-1727 / Pete Koszalka (415) 973-3818 / Marianne Aikawa (415) 973-0375

Resolution Required? Yes No

Requested effective date: **May 30, 2015**

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:

California Public Utilities Commission

Energy Division

EDTariffUnit

505 Van Ness Ave., 4th Flr.

San Francisco, CA 94102

E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Meredith Allen

Senior Director, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

Attachment 1

Narrative

PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT
FOR THE FIRST QUARTER OF 2015

April 30, 2015

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Summary of Public Attachments

- Public Attachment G: *Independent Evaluator Reports*, provides any relevant Independent Evaluator (IE) report(s) completed during the Quarter redacted to protect confidential information.
- Public Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter redacted to protect confidential information.

Summary of Confidential Attachments

- Confidential Attachment A: *Transactions*, provides a summary of all transactions executed during the Quarter, which are less than five years in length and that have not been filed through a separate advice filing or application.
- Confidential Attachment B: *Counterparty Information*, provides a summary of (1) all non-investment grade counterparties with whom PG&E transacted; and (2) the top 10 counterparties by volume during the Quarter.
- Confidential Attachment C: *Electric Transactions Summary*, provides a summary of the electric transactions executed during the Quarter.
- Confidential Attachment D: *Natural Gas Transactions Summary*, provides a summary of the gas transactions executed during the Quarter.
- Confidential Attachment E: *Other Transactions*, provides the executed transactions resulting from non-energy-related products during the Quarter.
- Confidential Attachment F: *Key Briefing Packages*, provides a summary of all relevant Procurement Review Group (PRG) agendas and presentations presented.
- Confidential Attachment G: *Independent Evaluator Reports*, provides any relevant Independent Evaluator (IE) report(s) completed during the Quarter.
- Confidential Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter.

Summary of Confidential Attachments
(Continued)

- Confidential Attachment I: *Summary of Retained Generation Investments Completed*, provides a summary of any investments related to retained generation facilities and multiple contracts for the same supplier, resource or facility, consistent with the requirements of D.07-01-039.
- Confidential Attachment J: *System Load Requirements/Conditions*, provides a summary of all information related to addressing PG&E's residual net open position.
- Confidential Attachment K: *Risk Management Strategy Communication and Management Disclosure*, provides a summary of all procurement-related risk strategies and issues communicated to PG&E's senior management.
- Confidential Attachment L: *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*, provides a summary of any models related to the relevant transactions identified in this filing.
- Confidential Attachment M: *Transactions Subject to Strong Showing*, provides a summary and supporting documentation for strong showing transactions.

A. Introduction

As required by Ordering Paragraph (OP) 8 of Decision (D.) 02-10-062, and clarified in D.03-06-076, D.03-12-062, D.04-07-028, D.04-12-048 and D.07-12-052, Pacific Gas and Electric Company (PG&E) hereby provides its report demonstrating that its procurement-related transactions during the period January 1, 2015 through March 31, 2015 (Quarter) were in compliance with PG&E's Bundled Procurement Plan (BPP or Plan) approved by the California Public Utilities Commission (CPUC or Commission) in D.12-01-033 and D.12-04-046.

B. Summary

During the Quarter, PG&E engaged in the following procurement activities in accordance with its BPP-approved procurement methods and practices:

1. **Competitive Solicitations, Approval Through the Quarterly Compliance Report (QCR)** –
 - a. Competitive Solicitation (Gas Storage RFO), described in greater detail in Section C.3, below.
2. **Other Competitive Solicitation Activity During the Quarter** (are referenced here for informational purposes only) –
 - a. PV Power Purchase Agreement (PPA) RFO (issued October 21, 2014)
 - b. 2014 Energy Storage RFO (issued December 1, 2014)
 - c. 2015 RPS RFO (issued January 5, 2015)
 - d. 2015 GHG Offset Credit RFO (issued February 26, 2015)
3. **Other Procurement Activities, Approval Through the QCR** – PG&E also seeks approval of the following transactions executed from procurement activities, other than competitive solicitations, through this QCR:
 - a. Electric Transactions:
 - i. California Independent System Operator (CAISO) Monthly Congestion Revenue Rights (CRR) Allocation and Auction Processes
 - ii. Convergence Bidding
 - iii. Physical Power Sale (“Bookouts”)

- iv. Bilaterally Negotiated Contracts
- v. Electronic-Solicitations

These procurement activities are described in greater detail in Section C.3, below.

- b. Gas Transactions:
 - i. Transparent Exchanges
 - ii. Direct Bilateral Contracting for Short-Term Products
 - iii. Voice Brokers
 - iv. Electronic Solicitations

These procurement activities are described in greater detail in Section C.3, below.

- 4. **Other Procurement Activities, Approval Through Separate Advice Filing or Regulatory Process** – During the Quarter, approval of contracts resulting from the following procurement activities was requested through separate regulatory processes, and are referenced here for informational purposes only:
 - a. Bilaterally negotiated contracts or amendments executed pursuant to other regulatory requirements.

C. Master Data Request Documentation

D.02-10-062, Appendix B, as clarified by D.03-06-076, sets forth specific elements to be addressed in this report. Each element is discussed below.

1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.

All procurement-related activity during the Quarter was approved and executed either by, or under the direction of, Fong Wan, Senior Vice President, Energy Procurement; Roy Kuga, Vice President, Energy Supply Management; Gary Jeung, Senior Director, Renewable Energy; Don Howerton, Director, Renewable Transactions; Marino Monardi, Director, Portfolio Management; and/or Pete Koszalka, Director, Electric Gas Supply, consistent with the delegation of authority effective for the period.

2. The briefing package provided to the ultimate decision maker.

The “decision-maker” for a particular contemplated transaction depends on many factors, such as term, volume, and notional value. For many of the transactions during the Quarter, the “decision-maker” was a gas or power trading employee executing transactions per an established plan or to achieve a particular objective (such as balancing the portfolio supply and demand). For such transactions, briefing packages are not prepared. Briefing packages prepared during the Quarter for transactions or procurement activities that required senior management approval are included in Confidential Attachment K. In addition, copies of presentations made by PG&E to its Procurement Review Group (PRG) during the Quarter are included in Confidential Attachment F.

3. Description of and justification for the procurement processes used to select the transactions.

a) Electric Procurement – Description

BPP-approved electricity procurement processes used during the Quarter include:

- CAISO’s CRR Allocations and Auctions
- Convergence Bidding
- Physical Power Sale (“Bookouts”)
- Bilaterally Negotiated Contracts
- Electronic Solicitations
- Qualifying Facility/Combined Heat and Power (QF/CHP) Legacy Contracts

b) Electric Procurement – Justification

- i. For competitive solicitations, describe the process used to rank offers and select winning bid(s).
 - PG&E did not execute any contracts during this Quarter for approval through this QCR.
- ii. For other transactional methods, provide the documentation supporting the selection of the chosen products.

The approved procurement processes used during the Quarter and supporting documentation include the following:

- CAISO Monthly CRR Allocation and Auction Process – PG&E procures CRRs to narrow the distribution of PG&E’s energy procurement costs due to electric transmission congestion. PG&E obtains CRRs, subject to risk assessment, for the specific source/sink combinations as approved in its BPP.

PG&E acquires CRRs for any path (represented by a source-sink pair) connecting existing generation sources to existing loads (e.g., retail loads, Helms pumping load and wholesale load obligations) or for any path that PG&E reasonably anticipates that it might need to flow energy in the future due to the addition of new contracts, resources or load obligations. Additionally, there may be CRRs which are positively correlated in value with CRRs for paths that have limited availability. PG&E is also authorized to acquire CRRs for such positively correlated paths.

PG&E estimated that a portion of its generation, imports and load in the months of February 2015, March 2015, and April 2015, remained exposed to congestion risk, and, therefore, participated in the CAISO’s monthly CRR allocation and auction process to obtain CRRs to mitigate this risk. In January 2015, February 2015 and March 2015, PG&E participated in Tier 1, Tier 2 and the Auction of the CAISO’s monthly CRR process to procure CRRs for February 2015, March 2015 and April 2015, respectively. Relevant information is included in Confidential Attachment J, including supplemental material regarding March activity.

- Convergence Bidding – Based on factors including anticipated loads, resource availabilities and intermittent resource generation forecasts, PG&E participates in the CAISO’s convergence bidding market. Relevant information is included in Confidential Attachments E, F and J.
- Physical Power Sale (“Bookouts”) – In the course of scheduling physical power transactions which require transmission from one region to another, power is sometimes interrupted. In such cases it is necessary for the buyer and seller to settle the interrupted power financially. Those transactions appear as sales back to the counterparty from which the power was originally purchased. Such transactions are commonly termed as “bookouts.” During the Quarter, PG&E executed four bookouts contracts. Relevant information is included in Confidential Attachment A.
- Bilaterally Negotiated Contracts – During the Quarter, PG&E executed two bilateral sales: one for local Resource Adequacy (RA) and one for RA Import Capacity Counting Rights. Relevant information and supporting justifications are included in Confidential Attachments E and H.
- Electronic Solicitations – During the Quarter, PG&E executed two contracts through an Electronic Solicitation: one for system RA and one for RA Import Capacity Counting Rights. Relevant information is included in Confidential Attachments E, H, and L.

- QF/CHP Legacy Contracts (For informational purposes only) – Under the QF/CHP Program, some QF generators holding a legacy contract may convert to one of several new PPAs (i.e., Under 20 megawatts (MW) PURPA PPA, Transition PPA, and As-Available PPA) during the Quarter. In addition, many of the remaining legacy QF contracts are still active and may require amendments or letter agreements to help the generator meet the requirements of the Commission’s CHP Program (e.g., GHG administration and metering issues) that were not required under the former program. Relevant information is included in Confidential Attachment H.

c) Natural Gas Procurement – Description

PG&E procured natural gas during the Quarter using various methods, including:

- Competitive Solicitation (Gas Storage RFO)
- Transparent Exchanges
- Direct Bilateral Contracting for Short-Term Products
- Voice Brokering for the purchase and sale of natural gas futures or options
- Electronic Solicitations

d) Natural Gas Procurement – Justification

- For competitive solicitations (RFOs), describe the process used to rank offers and select winning bid(s).
 - There was one competitive solicitation (RFO) for natural gas storage procurement during the Quarter and one contract was executed on February 19, 2015. PG&E evaluated and selected offers based on price. Relevant information is included in Confidential Attachments E, H and L.
- For other transactional methods, provide the documentation supporting the selection of the chosen products.
 - Transparent Exchanges: Electronic trading exchanges for transparent prices:

Commodity Purchases/Sales – PG&E bought and sold physical natural gas on the Intercontinental Exchange (ICE) and the ICE Natural Gas Exchange (ICE/NGX) physical clearing service. ICE is an electronic system that matches buyers and sellers of natural gas products. Once buyer and seller are matched, ICE trades become bilateral trades. ICE/NGX trades are cleared by NGX rather than bilaterally. Physical transactions in the Quarter include next day and same day transactions for delivery periods of one to five days. Relevant information is included in Confidential Attachment A.

Gas Hedges (in Compliance With D.12-01-033) – During the Quarter, PG&E conducted hedging activities that were in compliance with its approved Hedging Plan. PG&E executed hedges (futures and options) directly on the ICE electronic trading platform. Hedge transactions were cleared through exchanges (ICE or the New York Mercantile Exchange [NYMEX]). ICE and NYMEX provide access to anonymous bids and offers establishing both a liquid and robust market for financial products, and a benchmark for bilateral products. These products include Henry Hub futures and options, and basis futures against the industry benchmark indices, including Canadian Gas Price Reporter (CGPR), Gas Daily, Natural Gas Intelligence (NGI) and Inside FERC (IFERC) Gas Market Report. Worksheets demonstrating PG&E’s compliance with D.12-01-033 are in Confidential Attachment L.

- Direct Bilateral Contracting for Short-Term Products:

Commodity Purchases/Sales – PG&E bought and sold physical gas directly with counterparties in the bilateral market. Spot gas (deliveries less than one month) is traded at fixed prices and Gas Daily or CGPR index. Prompt month supply (deliveries each day of the following month) and term gas (greater than one month forward or one month in duration) is traded at fixed price, daily index (Gas Daily or CGPR), or monthly or bidweek index (CGPR, NGI, or IFERC) prices. For any bilateral physical supply trades with a term of one month, PG&E concluded these transactions bilaterally, but also used electronic solicitation methods, such as instant messaging, e-mail, voice solicitation (telephone), real time market prices, and/or broker quotes, to inform and conduct these transactions. Relevant information is included in Confidential Attachments A and M.

Gas Parking and Lending – PG&E purchased gas parking and/or lending services to balance its daily supplies with demand. The terms of the parking and lending transactions were less than one month.

- Voice Brokers – Gas Hedges – PG&E executed natural gas hedges (futures) through voice brokers that resulted in exchange-cleared trades. Brokers provide access to anonymous bids and offers from both bilateral parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled bilaterally or cleared through NYMEX or ICE. The broker market trades the same financial products as the exchanges. Relevant information is included in Confidential Attachment A.
- Voice Brokers – Commodity Purchases/Sales – PG&E executed physical gas supply transactions through voice brokers that resulted in bilateral transactions. Brokers provide access to anonymous bids and offers from both bilateral parties and cleared counterparties. After a broker matches a

buyer and a seller in a trade, the parties will determine whether the trade will be settled bilaterally or cleared through NGX. The broker market trades the same products as the bilateral market. Relevant information is included in Confidential Attachment A.

- **Electronic Solicitations:**

Conducted via Instant Messaging and Telephone – PG&E conducted auctions for the purchase of natural gas futures and options using instant messaging and telephone with financial counterparties. In this way, PG&E is able to obtain robust price quotes from the marketplace, in real time, and may then execute with the counterparty with the best offer(s). These transactions were then cleared on an exchange, such as NYMEX or ICE.

PG&E conducted auctions for the purchase of multi-month physical gas supply using instant messaging and telephone. In this way, PG&E is able to obtain robust price quotes from the marketplace, in real time, and may then execute with the counterparty with the best offer(s).

e) Other Commodities

- i. For competitive solicitations, describe the process used to rank offers and select winning bid(s).
 - PG&E did not execute any contracts during this Quarter for approval through this QCR.
- ii. For other transactional methods, provide the documentation supporting the selection of the chosen products.
 - California Air Resources Board (CARB) Allowance Allocation and Auction Processes – PG&E received its annual electric distribution utility (EDU) allocation of Vintage 2015 allowances from CARB in October 2014. All of the EDU allowances will be consigned into the 2015 CARB Auctions as required by the regulations and consistent with PG&E's BPP. CARB and Québec's ministère du Développement durable, de l'Environnement et de la Lutte contre les changements climatiques² (MDDELCC) held joint allowance auction #2 on February 18, 2015 for vintage 2015 and 2018 allowances. PG&E is authorized to procure GHG products through CARB Auctions, approved exchanges, and utilizing a competitive RFO process. PG&E provided information regarding its allowance procurement strategy to the PRG. Relevant information is included in Confidential Attachments E, F, K and L.

4. Explanation/justification of the timing of the transactions.

a) Electric Transactions

When selecting electric transactions, the best-priced bids/offers are selected first (merit-order selection) among those available for the required products at the time of the transaction, subject to credit and other limitations and operational constraints. Operational constraints include the local area reliability requirements of the CAISO, as set forth in D.04-07-028. Detailed explanation/justification for the timing of the transactions is included in Confidential Attachment J.

b) Natural Gas Transactions

For daily physical gas transactions, timing of execution is primarily driven by the requirement to match fuel usage by utility-owned and contracted electric generating units and supply delivered on a daily and monthly basis, and by the availability of information impacting expectations for daily dispatch of these units. For transactions one month or longer, PG&E typically fills its forecast short gas positions in month-ahead, seasonal, or annual blocks, depending on the liquidity and prices available in each of these markets. Execution of term transactions is based on the PG&E Electric Portfolio 2014-2015 (April 1, 2014 – March 31, 2015) Physical Gas Procurement Plan and documentation supporting the timing of transactions is included in Confidential Attachment J.

5. Discussion of the system load requirements/conditions underlying the need for the Quarter's transactions.

a) PG&E Participation in the CAISO Markets

PG&E participates in the CAISO Day Ahead electricity markets. PG&E's day-ahead planning and procurement incorporates weather-adjusted load forecasts, resource availability, price forecasts, dispatch costs and current bilateral electric market and forecasts of the CAISO's Integrated Forward Market (IFM) prices. The results of this process allow PG&E to determine the incremental costs of dispatchable resources that are bid into the IFM and the Real-Time Market (RTM).

It also determines the price upon which PG&E is willing to pay the CAISO for meeting its hourly load. The CAISO then assures least cost dispatch by considering all resources simultaneously with all transmission constraints.

In the RTM, similar to the day-ahead market, PG&E submits resource bids and schedules into CAISO markets and those resources that clear the market will be obligated to operate in real time.

b) PG&E-Owned Generation Conditions During First Quarter 2015

PG&E received 34 percent of normal rainfall during the Quarter.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as unit availability, system conditions, and economics allowed. On September 28, 2014 Unit 2 began a planned outage to replace the generator rotor. Unit 2 was released to full operation and system dispatch on January 23, 2015. On March 1, 2015, Unit 3 began a planned outage to replace its generator rotor and is scheduled to return to service May 17, 2015. There were no forced outages at Helms during the Quarter.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Balch 1 Unit 1 (34 MW), Balch 2 Units 2 & 3 (52.5 MW, each), Belden (125 MW), Butt Valley (41 MW), Caribou 1 Units 1, 2, & 3 (25 MW, each), Caribou 2 Unit 4 (60 MW), Drum 1 Units 1, 2, 3 & 4 (13.2 MW, 13.2 MW, 13.1 MW & 14.4 MW), Electra Units 1, 2 & 3 (31 MW, 31 MW & 36 MW), Haas Units 1 & 2 (72 MW, each), Kerckhoff 2 Unit 1 (155 MW), Kings River (52 MW), Pit 1 Units 1 & 2 (30.5 MW, each), Pit 4 Units 1 & 2 (47.5 MW, each), Pit 7 Units 1 & 2 (56 MW, each), and Rock Creek Unit 1 (63 MW).

Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW were incurred at: Belden (125 MW), Caribou 1 Unit 1 (25 MW), and Pit 5 Units 1, 3 & 4 (40 MW, each).

There were no planned outages at the fossil combined cycle facilities, Gateway and Colusa Generating Stations, during the Quarter. There was one forced outage greater than 24 hours during the Quarter at Gateway Generating Station on January 25, 2015. There was one planned outage at Humboldt Bay Generating Station Unit 3. This outage, a 12,000-hour engine overhaul, began on February 17, 2015, and lasted for 11 days. There was one forced outage greater than 24 hours during the Quarter at Humboldt Bay Generating Station Unit 8 on January 12, 2015.

DCPP Unit 1:

At the start of January, Unit 1 continued a planned outage that began on December 31, 2014, to repair a feedwater heater tube. During the outage a degraded weld on the residual heat removal system was discovered and repaired. Unit 1 returned to service on January 4, 2015 and ramped up to full power on January 6, 2015. Unit 1 operated at full power the remainder of the 1st quarter 2015.

DCPP Unit 2:

On March 23, 2015, Unit 2 experienced an unplanned manual curtailment to 98% power to repair a feedwater heater drip control valve, operating below full power for 31 hours. Otherwise, Unit 2 operated at full power the remainder of the Quarter.

6. Discussion of how the Quarter's transactions meet the goals of the risk management strategy reflected in the Plan.

As described in Section 3.d. above, during the Quarter, PG&E executed transactions in accordance with its Hedging Plan. A list of relevant information regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachments F and K.

7. Copy of each contract.

A list of transactional contracts executed and/or modified by PG&E during the Quarter is included in Confidential Attachment H. Copies of the contracts that PG&E is seeking approval of through this QCR are also included in this attachment.

8. The valuation results for the contract(s) (for contracts of three months or greater duration).

PG&E provides the valuation method and results for the contracts filed via this QCR in Confidential Attachment H.

9. An electronic copy of any data or forecasts used to analyze the transactions.

Because transaction personnel are continuously monitoring a wide range of market information on a 24-hour-per-day, 7-day-per-week basis, it is not feasible to provide all the data and forecasts used to analyze all potential and executed transactions. However, key analysis data utilized during the Quarter is in Confidential Attachment J.

10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.

To the extent any analyses requested by the Commission or PRG during the Quarter were not already included as a part of PG&E's response to Items 1 through 9 above, such additional analyses would be contained in Confidential Attachment F.

11. Any other information sought by the Commission under the Public Utilities Code.

To the extent that the Office of Ratepayer Advocates (ORA) has requested information for the Quarter as identified in its Master Data Request, this information will be included in PG&E's Master Data Request response, and submitted to the ORA 14 days after the filing of the QCR. In addition, the Commission's Energy Division has requested that PG&E provide transparent exchange traded prices. PG&E has included this information in Confidential Attachments A and E.

D. Additional Reporting Requirement Pursuant to Decision 07-01-039

As required by OP 12 of D.07-01-039, PG&E has included in Confidential Attachment I, investments in retained generation that were completed during the Quarter, as well as any multiple contracts of less than five years with the “same supplier, resource or facility” as required in D.07-01-039 on page 154. There were no transactions or investments to report during the Quarter.

E. Cost Allocation Mechanism (CAM)

For the Quarter, PG&E executed an AB 1613 contract that may qualify as a CAM resource.

Attachment 2

Attachment H (Public Version)

**Pacific Gas and Electric
Public Attachment H
First Quarter 2015**

New Contracts Executed and Amended During the Quarter

The table below provides a summary of Request for Offer (“RFO”) and Solicitation contracts executed during this Quarter and filed for CPUC approval via this Procurement Transaction Quarterly Compliance Report (QCR) advice letter. A copy of the contract(s) is included. Workpapers providing the method for valuation results calculations are included in *Confidential Attachment L - Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume (MW/MMBtu)	Price	Notional Value (\$)	Confirm File Name
Lodi Gas Storage, L.L.C.	2/19/2015	Firm Storage					Gas Storage RFO.zip

**Pacific Gas and Electric
Public Attachment H
First Quarter 2015**

The table below provides a summary of auction and/or e-solicitation contracts executed during the Quarter.

Contract/ Counterparty Name	Executed Date	Product	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Shell Energy North America (US), L.P. (33B022M05)	2/11/2015	System Resource Adequacy (RA) (Sale)					Electric E-Solicitations Transactions folder
Shell Energy North America (US), L.P. (33B022M06)	2/11/2015	RA Import Allocation Rights (Sale)					Electric E-Solicitations Transactions folder

The table below provides a summary of bilateral contracts and significant exchange-placed trades executed during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed Date	Product	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Calpine Energy Services, L.P. (33B029M01)	1/30/2015	Local RA (Sale)					Electric Bilateral Transactions Folder
Shell Energy North America (US), L.P. (33B022M07)	3/6/2015	RA Import Allocation Rights (Sale)					Electric Bilateral Transactions Folder

**Pacific Gas and Electric
Public Attachment H
First Quarter 2015**

Informational purposes only: A summary of QF/CHP contracts executed and/or amended during the Quarter filed via separate application, advice letter or other approval mechanisms:

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
EDF Renewable Windfarm V, Inc. (10MW) (06W148)	1/21/2015	QF	N/A	Consent to Assignment (CTA)	N/A	2015 ERRA Compliance Filing
EDF Renewable Windfarm V, Inc. (70MW – D) (06W146D)	1/21/2015	QF	N/A	CTA	N/A	2015 ERRA Compliance Filing
EDF Renewable Windfarm V, Inc. (70MW – C) (06W146C)	1/21/2015	QF	N/A	CTA	N/A	2015 ERRA Compliance Filing
EDF Renewable Windfarm V, Inc. (70MW – B) (06W146B)	1/21/2015	QF	N/A	CTA	N/A	2015 ERRA Compliance Filing
Mckittrick Limited (25C275QTR)	1/23/2015	QF	N/A	CTA	N/A	2015 ERRA Compliance Filing
Live Oak Limited (25C274QTR)	1/23/2015	QF	N/A	CTA	N/A	2015 ERRA Compliance Filing
Chalk Cliff Limited (25C272QTR)	1/23/2015	QF	N/A	CTA	N/A	2015 ERRA Compliance Filing
Badger Creek Limited (25C250QTR)	1/23/2015	QF	N/A	CTA	N/A	2015 ERRA Compliance Filing
Chevron USA (McKittrick) (25C193QPA)	1/28/2015	PURPA		Extension Agreement	N/A	2015 ERRA Compliance Filing
Madera-Chowchilla Water and Power Authority (25H036)	1/30/2015	QF		Extension Agreement	N/A	2015 ERRA Compliance Filing
Green Ridge Power LLC (23.8 MW) (16W011)	2/20/2015	QF	N/A	Amendment	N/A	2015 ERRA Compliance Filing
Green Ridge Power LLC (100 MW-D) (01W146D)	2/20/2015	QF	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Green Ridge Power LLC (100 MW-D) (01W146D)	2/20/2015	QF	N/A	Amendment	N/A	2015 ERRA Compliance Filing
Green Ridge Power LLC (100 MW-A) (01W146A)	2/20/2015	QF	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing

**Pacific Gas and Electric
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Green Ridge Power LLC (70 MW) (01W035)	2/20/2015	QF	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Green Ridge Power LLC (70 MW) (01W035)	2/20/2015	QF		Extension Agreement	N/A	2015 ERRA Compliance Filing
Green Ridge Power LLC (5.9 MW) (01W018)	2/20/2015	QF	N/A	Amendment	N/A	2015 ERRA Compliance Filing
Green Ridge Power LLC (110 MW) (01W004)	2/20/2015	QF	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Chevron USA (McKittrick) (25C193QPA)	2/25/2015	PURPA		Extension Agreement	N/A	2015 ERRA Compliance Filing
Rio Bravo Poso (25C076)	2/27/2015	QF	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Thermal Energy Development Corp. (16P054)	2/27/2015	QF		Amendment	N/A	2015 ERRA Compliance Filing
Chevron U.S.A. (McKittrick) (24B001FHP)	3/13/2015	AB1613	9 years 11 months	Contract	N/A	2015 ERRA Compliance Filing

Informational purposes only: A summary of the contracts executed and/or amended during the Quarter (non-CHP/QF) filed via separate application, advice letter or other approval mechanisms:

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Chalk Cliff Limited (33B124)	1/23/2015	Tolling	N/A	CTA	N/A	2015 ERRA Compliance Filing
Mckittrick Limited (33B123)	1/23/2015	Tolling	N/A	CTA	N/A	2015 ERRA Compliance Filing
Live Oak Limited (33B122)	1/23/2015	Tolling	N/A	CTA	N/A	2015 ERRA Compliance Filing
Badger Creek Limited (33B121)	1/23/2015	Tolling	N/A	CTA	N/A	2015 ERRA Compliance Filing
Bear Mountain Limited (33B112)	1/23/2015	Tolling	N/A	CTA	N/A	2015 ERRA Compliance Filing
Mojave Solar LLC (33R089-AR)	1/28/2015	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing

**Pacific Gas and Electric
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Sand Hill Wind, LLC (Dyer Road) (33R332)	2/3/2015	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Sand Hill Wind, LLC (Altamont) (33R331)	2/3/2015	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Sand Hill Wind, LLC (Dyer Road) (33R332)	2/11/2015	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Sand Hill Wind, LLC (Altamont) (33R331)	2/11/2015	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Ripon Cogeneration LLC (33B125)	2/24/2015	Tolling	N/A	Routine Amendment to Agreement	N/A	2015 ERRA Compliance Filing
GASNA 30P, LLC (Camden FIT1) (33R352RM)	3/2/2015	ReMAT	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Midway Sunset Cogeneration Company (33B126)	3/3/2015	Tolling	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
Pristine Sun Fund 2 LLC (Baldwin) (33R369RM)	3/11/2015	ReMAT	20 years	Contract	n/a	E-ReMAT
Pristine Sun Fund 2 LLC (Gentry) (33R370RM)	3/11/2015	ReMAT	20 years	Contract	n/a	E-ReMAT
Pristine Sun Fund 2 LLC (McCall) (33R372RM)	3/11/2015	ReMAT	20 years	Contract	n/a	E-ReMAT
Pristine Sun Fund 2 LLC (Campbell) (33R371RM)	3/11/2015	ReMAT	20 years	Contract	n/a	E-ReMAT
Rock Creek, L.P. (33R373RM)	3/11/2015	ReMAT	20 years	Contract	n/a	E-ReMAT
Los Esteros Critical Energy Facility LLC (33B099)	3/18/2015	Tolling	N/A	Amendment	N/A	2015 ERRA Compliance Filing
Sand Hill Wind, LLC (33R287)	3/19/2015	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing
High Plains Ranch III, LLC (33R088)	3/23/2015	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRA Compliance Filing

**Pacific Gas and Electric
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
High Plains Ranch II, LLC (33R052)	3/23/2015	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRR Compliance Filing
Kern River Cogen Company (33B118)	3/23/2015	Tolling (Hybrid)	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRR Compliance Filing
Westside Solar, LLC (33R375)	3/23/2015	RPS	20 years	Contract	4/20/2015	Advice Letter 4620-E
CED Corcoran Solar 3, LLC (33R374)	3/23/2015	RPS	20 years	Contract	4/20/2015	Advice Letter 4620-E
Aspiration Solar G, LLC (33R376)	3/23/2015	RPS	20 years	Contract	4/20/2015	Advice Letter 4620-E
Pristine Sun Fund 6, LLC (Ramirez) (33R318AB)	3/24/2015	AB1969/FiT	N/A	CTA	N/A	2015 ERRR Compliance Filing
Pristine Sun Fund 6, LLC (Foote) (33R316AB)	3/24/2015	AB1969/FiT	N/A	CTA	N/A	2015 ERRR Compliance Filing
Pristine Sun Fund 6, LLC (Dacy) (33R312AB)	3/24/2015	AB1969/FiT	N/A	CTA	N/A	2015 ERRR Compliance Filing
ImMODO California 1, LLC (Lemoore 1) (33R307AB)	3/25/2015	AB1969/FiT	N/A	Routine Amendment to Existing Agreement	N/A	2015 ERRR Compliance Filing
Bottle Rock Power, LLC (33R019AR)	3/25/2015	RPS	N/A	Amendment	N/A	2015 ERRR Compliance Filing
Alamo Solar, LLC (33R279)	3/30/2015	RPS	N/A	CTA	N/A	2015 ERRR Compliance Filing

**Pacific Gas and Electric
Public Attachment H
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Informational purposes only: A summary of the contracts terminated/expired during the Quarter:

Contract/ Counterparty Name	Termination or Expiration*	Date	Product	Volume (MW)
Covanta Mendota L.P.(25C013)	Expiration	1/14/2015	QF	25
Shasta Renewable Resources (33R147)	Termination	1/30/2015	RPS	6.8
Wendel Energy Operations I, LLC (10G011)	Termination	2/1/2015	QF	0.7
Pristine Sun Fund 2, LLC (Gabrych) (33R311AB)	Termination	2/16/2015	AB1969/FiT	1.25
ImMODO California 1, LLC (Lemoore 3) (33R309AB)	Termination	2/17/2015	AB1969/FiT	1.5
ImMODO California 1, LLC (Lemoore 4) (33R310AB)	Termination	2/17/2015	AB1969/FiT	1.5
Sand Hill Wind, LLC (Altamont) (33R331)	Termination	2/17/2015	RPS	8.6
Sand Hill Wind, LLC (Dyer Road) (33R332)	Termination	2/17/2015	RPS	11.4
Apex Natural Renewable Generation LLC (33R306AB)	Termination	2/26/2015	AB1969/FiT	0.998
Fairfield Power Plant (25H193)	Termination	2/28/2015	QF	0.9
Canal Creek Power Plant (25H204)	Termination	2/28/2015	QF	0.9
Ripon Cogen, LLC (16C034)	Termination	2/28/2015	QF	49.5
Patterson Pass Wind Farm LLC (16W028)	Expiration	3/5/2015	QF	22
ImMODO California 1, LLC (Lemoore 2) (33R308AB)	Termination	3/10/2015	AB1969/FiT	1.5
Cardinal Cogeneration Inc. (08C003)	Termination	3/31/2015	QF	49.9
Bottle Rock Power, LLC (33R019-AR)	Termination	3/31/2015	RPS	15
Madera-Chowchilla Water and Power Authority (25H036)	Expiration	3/31/2015	QF	2

**Pacific Gas and Electric
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First Quarter 2015**

Contract/ Counterparty Name	Termination or Expiration*	Date	Product	Volume (MW)
Water Wheel Ranch (13H124)	Expiration	3/31/2015	QF	0.975
Freeport McMoRan Oil & Gas LLC (Welpart) (25C308QPA)	Expiration	3/31/2015	QF/CHP	0.5
Chevron U.S.A. (McKittrick) (25C193QPA)	Expiration	3/31/2015	QF/CHP	9.651

* A terminated contract is ended before its original expiration date. An expiration date is the natural end of the contract.

Attachment 3
Confidentiality Declarations and Matrix

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 4626-E**

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN
CONFIDENTIAL ATTACHMENTS A, B, C, E, H, J, 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. This declaration is based on my personal knowledge of PG&E’s practices and my understanding of the Commission’s decisions protecting the confidentiality of market-sensitive information.
2. Based on my knowledge and experience, and in accordance with Decisions (“D.”) 06-06-066, 08-04-023, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E’s April 30, 2015 Advice Letter 4626-E, Confidential Attachments A, B, C, E, H, J, 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 confidential market sensitive data and information covered by D.06-06-066, 14-10-033 and/or General Order 66-C. The matrix also specifies why confidential

protection is justified. Further, the data and information: (1) is not already public; and (2) 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 April 30, 2015, at San Francisco, California.

/s/

Marianne Aikawa

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 4626-E**

**DECLARATION OF JAY BUKOWSKI
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S
CONFIDENTIAL ATTACHMENTS F AND K**

I, Jay Bukowski, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since October 1998. My current title is Principal 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. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.
2. Based on my knowledge and experience, and in accordance with Decisions ("D.") 06-06-066, 08-04-023, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's April 30, 2015 Advice Letter 4626-E, Confidential Attachments F 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 confidential market sensitive data and information covered by D.06-06-066, 14-10-033, and/or General Order 66-C. The matrix also specifies why confidential

protection is justified. Further, the data and information: (1) is not already public; and (2) 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 April 30, 2015, at San Francisco, California.

/s/

Jay Bukowski

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 4626-E**

**DECLARATION OF PETER E. KOSZALKA
SEEKING CONFIDENTIAL TREATMENT OF FOR CERTAIN DATA AND
INFORMATION CONTAINED IN CONFIDENTIAL ATTACHMENTS A, B, D, E, H, J,
L, and M**

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. My current title is Director, Electric Gas Supply in the Energy Supply Management Department, which is part of the Energy Procurement Department. I am responsible for physical and financial trading of gas in support of PG&E’s allocated Department of Water Resources contracts, PG&E’s utility-owned generation plants, 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. This declaration is based on my personal knowledge of PG&E’s practices and my understanding of the Commission’s decisions protecting the confidentiality of market-sensitive information.

2. Based on my knowledge and experience, and in accordance with Decisions (“D.”) 06-06-066, 08-04-023, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E’s April 30, 2015 Advice Letter 4626-E, Confidential Attachments A, B, D, E, H, J, L, and M.

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 confidential market sensitive data and information covered by D.06-06-066, 14-10-033 and/or General Order 66-C. The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) 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 April 30, 2015, at San Francisco, California.

/s/

Peter E. Koszalka

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4626-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER ONE 2015
 April 30, 2015**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment A – Physical and Financial Electric Transactions	Item XIII) Energy Division Monthly Data Request (AB 57) XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
Attachment A – Physical and Financial Natural Gas Transactions	Item I) B) 2) Utility recorded gas procurement and cost information XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings) Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Actual quantity and cost of procured physical gas are protected. Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Utility recorded physical gas procurement and cost information is confidential for one year. Monthly procurement costs (ERRA Filings) are confidential for 3 years. Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4626-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER ONE 2015
 April 30, 2015**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Attachment B – Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties	CPUC General Order (“G.O.”) 66-C	Counterparty information constitutes confidential business information protected under G.O. 66-C.	Indefinite
Attachment C - Electric Transactions	Item XIII) Energy Division Monthly Data Request (AB 57) Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation. This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
Attachment D – Natural Gas Transactions	Item I) B) 2) Utility recorded gas procurement and cost information Item I) A) 4) Long-term fuel (gas) buying	Actual quantity and cost of procured physical term gas are protected. PG&E’s hedging strategies may be deduced through an analysis of PG&E’s summarized transactions.	Utility recorded physical gas procurement and cost information is confidential for one year. Financial transactions are confidential for three years past

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4626-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER ONE 2015
 April 30, 2015**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
	and hedging plans		expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
Attachment E – Other Transactions (Except Greenhouse Gas (“GHG”) Information, which is presented separately below)	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids	This information includes confidential contract information for contracts between PG&E and non-affiliated third parties. This information also includes information related to PG&E’s participation in SDG&E’s RA RFO.	3 Years
Attachment E – Other Transactions-GHG Information	D.14-10-033 G.O. 66-C	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	D.06-06-066 and Public Utilities Code Section 454.5(g)	Presentations to the PRG include a variety of confidential market sensitive information, including information about bilateral contracts, pricing information, strategy discussions, recently issued RFO’s, etc.	Length of Time for Specific Items identified in D.06-06-066 Matrix or Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4626-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER ONE 2015
 April 30, 2015**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
	G.O. 66-C	The information constitutes confidential business information protected under GO 66-C.	
Attachment F – PRG Material-GHG Information	D.14-10-033 G.O. 66-C	Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations. The information constitutes confidential business information protected under GO 66-C.	Indefinite
Attachment H - Executed Contracts	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Disclosure of information would provide market sensitive information regarding bid strategy and selection. Disclosure of information would provide market sensitive information regarding bid strategy and selection. Residual net short/long is key input to PG&E's confidential forecast of net open position. Disclosure of information would provide market sensitive information regarding bid strategy and selection.	3 Years; Bid information - remain confidential until after final contracts submitted to CPUC for approval Utility recorded physical gas procurement and cost information is confidential for one year.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4626-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER ONE 2015
 April 30, 2015**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
	Item I)B) 2) Utility recorded gas procurement and cost information		
Attachment H – GHG Contracts Executed	D.14-10-033 G.O. 66-C	The information constitutes confidential business information protected under G.O. 66-C.	Indefinite
Attachment J – System Conditions	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric) G.O. 66-C	Residual net short/long is key input to PG&E's confidential forecast of net open position. The residual net short/long is information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report. This attachment also includes information regarding PG&E's trading strategies. The information constitutes confidential business information protected under G.O. 66-C.	3 Years Indefinite
Attachment J - Gas Transaction, Natural Gas Documents	Item I) A) 3) Gas Demand Forecasts and 4) Long-term fuel (gas) buying and hedging plans	This information includes detailed information on PG&E's implementation of its fuel buying and hedging plans and must remain confidential to avoid disclosing PG&E's market strategy.	Physical gas information is confidential for 3 Years; Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
Attachment K – Risk Management	G.O. 66-C	TeVaR and supporting forecasts and analysis are confidential. In addition, the Risk Management Committee attachments address PG&E's energy procurement	

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4626-E
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 April 30, 2015**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
		strategy, price, volumes, and counterparties. The information constitutes confidential business information protected under GO 66-C.	Indefinite
Attachment K – Risk Management-GHG Information	D.14-10-033 G.O. 66-C	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 - Electric	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric) Item XIII) Energy Division Monthly Data Request (AB 57) XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings) VIII) A) Bid	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve details which would reveal PG&E's position in the market place.	3 Years Bid information - remain confidential until after final contracts submitted to CPUC for approval

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
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 April 30, 2015**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
	information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids G.O. 66-C		
Attachment L – Reasonable Number of Analyses – Natural Gas	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	This information includes detailed information on PG&E's hedging plan, and must remain confidential to avoid disclosing PG&E's market strategy.	Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
Attachment M – Strong Showing Transactions	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.

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

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