

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 19, 2016

Advice Letter 4731-E and 4731-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 (Q3, 2015)
and Supplemental Filing**

Dear Mr. Jacobson:

Advice Letter 4731-E and 4731-E-A are effective as of November 29, 2015.

Sincerely,

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

Edward Randolph
Director, Energy Division

October 30, 2015

Advice 4731-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Procurement Transaction Quarterly Compliance Filing (Q3, 2015)

Purpose

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) its compliance filing for the third 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 July 1, 2015 through September 30, 2015, (Q3-2015) 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. Attachments 2 and 3 include the public versions of Attachments G and H, respectively. The confidential version of this QCR includes the following supporting Confidential Attachments:

Attachment A: Third Quarter 2015 Electric and Natural Gas Transactions
Attachment B: Third Quarter 2015 Counter-Party Information
Attachment C: Third Quarter 2015 Electric Transactions Summary

Attachment D:	Third Quarter 2015 Natural Gas Transactions Summary
Attachment E:	Third Quarter 2015 Other Transactions
Attachment F:	Third Quarter 2015 Key Briefing Packages
Attachment G:	Third Quarter 2015 Independent Evaluator (IE) Report
Attachment H:	Third Quarter 2015 New Contracts Executed/Contracts Amended
Attachment I:	Summary of Retained Generation Investments Completed During Third 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 Third Quarter

Attachment 4 to this QCR includes a confidentiality declaration and matrix.

The public version of this QCR is provided to the service lists for Rulemakings (“R.”) 10-05-006 and R.13-12-010. The confidential version of this QCR is provided to PG&E’s Procurement Review Group.

The filing will 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 November 19, 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:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
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).

Effective Date

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is November 29, 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.10-05-006 and R.13-12-010. 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/

Erik Jacobson
Director, Regulatory Relations

cc: Service List R.10-05-006 and R.13-12-010 (Public Version)
PG&E's Procurement Review Group (Confidential Version)

Public Attachments:

Attachment 1: Narrative

Attachment 2: Attachment G (Public Version)

Attachment 3: Attachment H (Public Version)

Attachment 4: 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) #: **4731-E**

Tier: **2**

Subject of AL: **Procurement Transaction Quarterly Compliance Filing (Q3, 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 / Peter Koszalka (415) 973-3818 / Marianne Aikawa (415) 973-0375

Resolution Required? Yes No

Requested effective date: **November 29, 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: Erik Jacobson

Director, Regulatory Relations

c/o Megan Lawson

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 THIRD QUARTER OF 2015

October 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 July 1, 2015 through September 30, 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. None for the Quarter.
2. **Other Competitive Solicitation Activity During the Quarter** (are referenced here for informational purposes only):
 - a. 2014 Energy Storage RFO (issued December 1, 2014)
 - b. 2014 RPS RFO (issued January 5, 2015)
 - c. RAM 6/Green Tariff Shared Renewables (issued July 7, 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. Direct Bilateral Contracting for Short-Term Products
 - iv. 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; 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 including:

- CAISO’s Monthly CRR Allocations and Auctions
- CAISO 2016 Annual CRR Allocation and Auction Process
- Convergence Bidding
- Direct Bilateral Contracting for Short-Term Products
- Electronic Solicitations
- Qualifying Facility/Combined Heat and Power (QF/CHP) Legacy Contracts
- CHP Feed-in Tariffs

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 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 August 2015, September 2015 and October 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 July 2015, August 2015 and September 2015, PG&E participated in Tier 1, Tier 2 and the Auction of the CAISO's monthly CRR process to procure CRRs for August 2015, September 2015 and October 2015, respectively. Relevant information is included in Confidential Attachment F, J, and L.

- CAISO 2016 Annual CRR Allocation and Auction Process – PG&E participated in the 2016 Allocation Tier 1 and the Long-Term Allocation Tier of the CAISO's 2016 Annual CRR Release Process. Awards from Tier 1 were posted on September 21, 2015, and are provided in this QCR. Awards for the Long-Term Tier were posted after the end of the Quarter and will be included in the next QCR. Relevant information is included in Confidential Attachments F, J, K, and L.
- 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.
- Direct Bilateral Contracting for Short-Term Products
 - Transmission: Transmission energy is purchased to relocate power from one point to another, often necessary outside a Regional Transmission Operator (RTO) such as the CAISO. Relevant information is included in Confidential Attachment A.
 - 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 one bookout contract. Relevant information is included in Confidential Attachment A.

- Resource Adequacy: During the Quarter, PG&E executed two bilateral short-term resource adequacy transactions. Both were for system sales and purchases. Relevant information and supporting justifications are included in Confidential Attachments E and H.
- Electronic Solicitations – Resource Adequacy: During the Quarter, PG&E executed three resource adequacy transactions via electronic solicitation. Relevant information is included in Confidential Attachment H.
- QF/CHP Legacy Contracts (For informational purposes only) – Some QF generators may execute a new PPA (i.e., Under 20 megawatts (MW) PURPA PPA or 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.
- CHP Feed-in Tariffs (For informational purposes only) – Under the Waste Heat and Carbon Emissions Act, codified as California Public Utilities Code section 2840 *et seq.* (Stats. 2007, Ch. 713), the Commission established a standard tariff for the sale of electricity from efficient CHP systems under 20 MW, and directed the electrical corporations to purchase excess electricity from eligible CHP generators. A CHP generator that is certified by the California Energy Commission is eligible under the CEC’s legal and technical guidelines to obtain a CHP feed-in tariff. In D.09-12-042, the Commission approved three pro forma contracts for use with CHP systems (known as “AB 1613 PPAs”) that are applicable to generators of different sizes: a standard contract for CHP generators under 20 MW, a simplified PPA for CHP generators less than 5 MW, and a further simplified PPA for smaller CHP systems under 500 kW. 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 Solicitations
- 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*

i. For competitive solicitations (RFOs), 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.

- 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. Relevant information is included in Confidential Attachments A.

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 over-the-counter 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 over-the-counter transactions. Brokers provide access to anonymous bids and offers from both over-the-counter 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 over-the-counter 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 prompt-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).

- None for the Quarter.

ii. For other transactional methods, provide the documentation supporting the selection of the chosen products.

- CARB Allowance Allocation and Auction Processes – PG&E received its annual allocation of Electric Distribution Utility (EDU) Current Vintage 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 climatiques (MDDELCC) held joint allowance auction #4 on August 18, 2015 for Current Vintage and 2018 Vintage allowances. PG&E is authorized to procure EDU 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 2015-2016 (April 1, 2015 – March 31, 2016) 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 and Real-Time 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 day-ahead 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 in the IFM. The CAISO then assures least cost dispatch by considering all resources simultaneously with all transmission constraints.

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

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

PG&E received 120 percent of normal rainfall during the Quarter. Although above normal, the normal level of precipitation in third Quarter is so low that this high percentage did not have a measureable impact on either generation or water storage levels.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as unit availability, system conditions, and economics allowed. On September 27, 2015 Helms Unit 1 began a planned outage to replace its generator rotor and is scheduled to return January 23, 2016. There were no forced outages greater than 24 hours during the Quarter at Helms.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Bucks Creek Units 1 & 2

(33 MW & 32 MW), Cresta U2 (35 MW), Drum 2 Unit 5 (49.5 MW), Rock Creek Unit 1 (63 MW) and Salt Springs Unit 1 (11 MW).

Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW during the Quarter were incurred at: Balch 1 Unit 1 (34 MW), Balch 2 Units 2 & 3 (52.5 MW, each), Bucks Creek Units 1 & 2 (33 MW & 32 MW), Caribou 2 Unit 4 (60 MW), Cresta Unit 1 (35 MW), Electra Units 1, 2 & 3 (31 MW, 31 MW & 36 MW), Haas Units 1 & 2 (72 MW, each), Kings River (52 MW), Pit 1 Unit 2 (30.5 MW), Poe Unit 1 (60 MW), Salt Springs Units 1 & 2 (11 MW & 33 MW), and Tiger Creek Units 1 & 2 (29 MW, each).

There were no planned outages at the fossil combined cycle facilities, Gateway and Colusa Generating Stations, during the Quarter. There also were no forced outages greater than 24 hours during the Quarter at the fossil combined cycle facilities, Gateway and Colusa Generating Stations. There was one planned outage at Humboldt Bay Generating Station Unit 1 during the Quarter. This outage, a 24,000-hour engine overhaul, began on September 16, 2015 and lasted 20 days. There was one forced outage greater than 24 hours during the Quarter at Humboldt Bay Generating Station Unit 8 on July 31, 2015.

Diablo Canyon Unit 1

Unit 1 operated at a capacity factor of 101.2% during third Quarter 2015, experiencing one automatic curtailment to 98% power caused by the failure of a moisture separator reheater instrument (on the Secondary, non-nuclear, side of plant operation), operating below full power on the grid for 3.6 days. Otherwise, Unit 1 operated at full power on the grid the remainder of third Quarter.

Diablo Canyon Unit 2

Unit 2 operated at a capacity factor of 96.2% during third Quarter 2015, performing two manual maintenance curtailments to 50% power for planned cleaning of marine growth from the main condenser waterboxes and ocean cooling

water tunnels, operating a total of 6.2 days below full power on the grid. Unit 2 also performed a 3-hour planned manual turbine/generator maintenance outage for spray-wash cleaning of electrical insulators as a precautionary measure to help prevent potential electrical flashover events during periods of heavy moisture. Otherwise, Unit 2 operated at full power on the grid the remainder of third 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 included 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)

PG&E executed one PURPA PPA and one associated Amendment under the QF/CHP Settlement that qualify for CAM-like treatment in the New System Generation Balancing Account (NSGBA).

Attachment 2
Attachment G – Public Version
Independent Evaluator’s Report

Public Attachment G

**Pacific Gas and Electric
Third Quarter 2015**

RFO Independent Evaluator Reports

Contract Description/ Counterparty Name	Contract Term	Execution Date	IE Report Workpaper Citation
None for the Quarter.			

Attachment 3
Attachment H – Public Version

**Pacific Gas and Electric
Public Attachment H
Third 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
None for the Quarter							

**Pacific Gas and Electric
Public Attachment H
Third 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
City of Santa Clara dba Silicon Valley Power (33B021M01)	September 16, 2015	System RA Purchase					Q3 2015 Electric E- Solicitation. zip
Sempra Generation, LLC (33B201M01)	September 16, 2015	System RA Purchase					
Dynegy Moss Landing, LLC (33B032N01)	September 21, 2015	System RA Purchase					

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
Exelon Generation Company (33B007M06)	July 14, 2015	System RA Sale					Q3 2015 Electric Bilateral.zip
Exelon Generation Company (33B007M07, 33B007M08)	August 12, 2015	System RA Exchange (Sell side)					
		System RA Exchange (Buy side)					

**Pacific Gas and Electric
Public Attachment H
Third 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
Greenleaf Unit #1 (12C020)	July 20, 2015	QF	N/A	Consent to Assignment (CTA)	N/A	2015 ERRA Compliance Filing
Greenleaf Unit #2 (12C021)	July 20, 2015	QF	N/A	CTA	N/A	2015 ERRA Compliance Filing
Chevron USA (Cymric) (25C003)	August 11, 2015	QF	N/A	Amendment	N/A	2015 ERRA Compliance Filing
Western Power and Steam, Inc. (25C138QPA)	September 10, 2015	PURPA	6.5 years	Contract	N/A	2015 ERRA Compliance Filing
Burney Forest Products (13C038)	September 17, 2015	QF	N/A	Amendment	September 18, 2015	Advice Letter 4706-E
Western Power and Steam, Inc. (25C138QPA)	September 25, 2015	PURPA	N/A	Amendment	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
Lassen Station Hydroelectric, LP (33R377RM)	June 30, 2015	ReMAT	N/A	Routine Amendment	N/A	2015 ERRA Compliance Filing
Coram California Development, L.P. (33R142)	July 1, 2015	RPS	N/A	CTA	N/A	2015 ERRA Compliance Filing
Goose Valley Farming LLC (33R378RM)	July 2, 2015	ReMAT	20 years	Contract	N/A	2015 ERRA Compliance Filing
Lassen Station Hydroelectric, LP (33R377RM)	July 2, 2015	ReMAT	20 years	Contract	N/A	2015 ERRA Compliance Filing

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Green Light Energy Corporation – Castor Solar Project (33R302AB)	July 2, 2015	AB 1969/FiT	N/A	CTA	N/A	2015 ERRA Compliance Filing
Green Light Energy Corporation – Castor Solar Project (33R302AB)	July 2, 2015	AB 1969/FiT	N/A	CTA	N/A	2015 ERRA Compliance Filing
Green Light Energy Corporation – Peacock Solar Project (33R304AB)	July 23, 2015	AB 1969/FiT	N/A	Amendment	N/A	2015 ERRA Compliance Filing
Enerparc CA1, LLC (33R210AB)	September 11, 2015	AB 1969/FiT	N/A	Amendment	N/A	2015 ERRA Compliance Filing
Oak Leaf Solar X (33R380RM)	September 15, 2015	ReMAT	20 years	Contract	N/A	2015 ERRA Compliance Filing
Merced 2 (33R379RM)	September 15, 2015	ReMAT	20 years	Contract	N/A	2015 ERRA Compliance Filing
Kern River Cogeneration Company (33B118)	September 17, 2015	Tolling (Hybrid)	N/A	CTA	N/A	2015 ERRA Compliance Filing
SPI Biomass (33R254)	September 22, 2015	RPS	N/A	Routine Amendment	N/A	2015 ERRA Compliance Filing

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

Informational purposes only: A summary of the contracts terminated/expired during the Quarter:

Contract/ Counterparty Name	Termination or Expiration*	Date	Product	Volume (MW)
Western Power and Steam, Inc. (25C138QTR)	Expiration	July 1, 2015	QF/CHP	29
Gestamp Asetym Solar North America (Peabody RBJ) (33R277)	Termination	July 10, 2015	RPS	14
Indian Valley Hydro (04H061QPA2)	Expiration	July 31, 2015	QF/CHP	3
Joe Richardson (08W040)	Termination	August 8, 2015	QF	0.002
Launderland (08C094)	Termination	August 8, 2015	QF	0.021
T.V. Schuhart (06W096)	Termination	August 8, 2015	QF	0.01
Michael W. Stephens (06W090)	Termination	August 8, 2015	QF	0.01
Gregory Merwin (06W080)	Termination	August 8, 2015	QF	0.0018
Richard E. Akin (06H113)	Termination	August 8, 2015	QF	0.1
Cross Court Athletic Club (06C157)	Termination	August 8, 2015	QF	0.026
Young Radio Inc. (06C153)	Termination	August 8, 2015	QF	0.02
Karen Rippey (04W072)	Termination	August 8, 2015	QF	0.004
Bertha Noll (04W063)	Termination	August 8, 2015	QF	0.01
Real Goods Trading Corp. (04S152)	Termination	August 8, 2015	QF	0.013
Napa Sanitation District (04P116)	Termination	August 8, 2015	QF	0.098
Pristine Sun Fund 6, LLC (2076 Maas) (33R313AB)	Termination	August 25, 2015	AB 1969/FiT	1.25

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

Contract/ Counterparty Name	Termination or Expiration*	Date	Product	Volume (MW)
Pristine Sun Fund 6, LLC (2143 Dacy) (33R312AB)	Termination	August 25, 2015	AB 1969/FiT	1.25
Sierra Pacific Industries (Anderson) (13P163EO2)	Termination	September 8, 2015	QF	5
Sierra Pacific Industries (Burney) (13C049)	Termination	September 8, 2015	QF	20
Sierra Pacific Industries (Quincy) (10C018)	Termination	September 8, 2015	QF	27.5
Sierra Pacific Industries (Sonora) (10C010)	Termination	September 8, 2015	QF	7.5
Sierra Pacific Industries (Lincoln) (12C008)	Termination	September 8, 2015	QF	19.2
Sierra Pacific Industries (Susanville) (10C009)	Termination	September 8, 2015	QF	15

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

Attachment 4
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 4731-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 October 30, 2015 Advice Letter 4731-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 October 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 4731-E**

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

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 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 October 30, 2015 Advice Letter 4731-E, Confidential Attachments A, B, D, 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 October 30, 2015, at San Francisco, California.

/s/

Peter E. Koszalka

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 4731-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 October 30, 2015 Advice Letter 4731-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 October 30, 2015, at San Francisco, California.

/s/
Jay Bukowski

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4731-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2015
 October 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)
Attachment B – Counterparty Information, including non-investment grade	CPUC General Order ("G.O.") 66-C	Counterparty information constitutes confidential business information protected under G.O. 66-C.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4731-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2015
 October 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
counterparties table: List of Non-Investment Grade Counterparties			
Attachment C - Electric Transactions	Item XIII) Energy Division Monthly Data Request (AB 57) 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 and hedging plans	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 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	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Items VIII) A) Bid	This information includes confidential contract information for contracts between PG&E and non-affiliated third parties.	3 Years

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4731-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2015
 October 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
presented separately below)	Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids		
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) G.O. 66-C	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. The information constitutes confidential business information protected under GO 66-C.	Length of Time for Specific Items identified in D.06-06-066 Matrix or Indefinite
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	Disclosure of information would provide market sensitive information regarding bid strategy and selection. Disclosure of information would provide market sensitive information regarding bid	3 Years; Bid information - remain confidential

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4731-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2015
 October 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
	quantitative analysis involved in scoring and evaluation of participating bids Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	strategy and selection. Residual net short/long is key input to PG&E's confidential forecast of net open position.	until after final contracts submitted to CPUC for approval
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 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 strategy, price, volumes, and counterparties.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 4731-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2015
 October 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
		The information constitutes confidential business information protected under GO 66-C.	
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 information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids G.O. 66-C	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
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)

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

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