

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 21, 2011

**Advice Letter 3952-E**

Brian K. Cherry  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**Subject: Update to PG&E Company's Conformed 2006 Long-Term  
Procurement Plan – Brokerages and Exchanges Listing**

Dear Mr. Cherry:

Advice Letter 3952-E is effective December 19, 2011.

Sincerely,

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

Edward F. Randolph, Director  
Energy Division



November 18, 2011

**Advice 3952- E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Update to Pacific Gas and Electric Company's Conformed 2006 Long-Term Procurement Plan - Brokerages and Exchanges Listing**

**Purpose**

Pacific Gas and Electric Company ("PG&E") hereby requests approval from the California Public Utilities Commission ("CPUC" or "Commission") to update its Conformed 2006 Long-Term Procurement Plan's ("LTPP") list of brokerages and exchanges to add four brokerages: Spectron Energy Inc., Karbone Inc., BGC Environmental Brokerage Services, L.P., and Edge Energy, LLC. In addition, PG&E proposes adding one exchange: Green Exchange, LLC (GreenX) and one futures commission merchant: BNP Paribas Prime Brokerage Inc.

**Background**

In accordance with Decision ("D.") 07-12-052, all updates proposed to the Conformed 2006 LTPP are made via advice letter. Advice letter updates are to include red-lined pages of the Conformed 2006 LTPP, as well as clean replacement pages.<sup>1</sup> Below, PG&E describes the updates to its Conformed 2006 LTPP and Attachments A and B reflect the relevant changes to PG&E's Conformed 2006 LTPP. Attachment A is the red-lined version of the changes and Attachment B is the clean version of the changes.<sup>2</sup>

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<sup>1</sup> D.07-12-052 at pp. 184-185.

<sup>2</sup> PG&E's 2010 Bundled Procurement Plan ("BPP") filed in Rulemaking ("R.") 10-05-006 is currently pending before the Commission for approval. To the extent the BPP is approved before this advice letter is approved, PG&E will update the BPP list of brokerages and exchanges to reflect the brokerages and exchanges addressed in this advice letter.

### **Additional Brokerages and Exchanges Listing**

In an effort to allow additional options for executing physical greenhouse gas (“GHG”) product trades, PG&E requests to add the following to its list of authorized brokerages and exchanges (Appendix H of its Conformed 2006 LTPP):

#### Brokerages:

- Spectron Energy Inc.
- Karbone Inc.
- BGC Environmental Brokerage Services, L.P.
- Edge Energy, LLC

#### Exchanges and Futures Commission Merchants:

- Green Exchange, LLC (GreenX)
- BNP Paribas Prime Brokerage Inc.

Authorizing these additions to PG&E’s list of approved brokerages and exchanges does not obligate PG&E to use them. Instead, adding these brokerages and exchanges will simply provide PG&E an option to do so. The decision to use these or any enabled brokerages or exchanges and futures commission merchants in Appendix H will be made on a transaction-by-transaction basis consistent with the authority provided under PG&E’s Commission-approved Conformed 2006 LTPP. PG&E has routinely updated its list of brokerages and exchanges in order to add potential new counterparties for transactions that are consistent with PG&E’s Conformed 2006 LTPP.

### **Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than **December 8, 2011**, which is 20 days from the date of this filing. Protests should be mailed to:

CPUC Energy Division  
Tariff Files, Room 4005  
DMS Branch  
505 Van Ness Avenue  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: [jjj@cpuc.ca.gov](mailto:jjj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)

Copies also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via U.S. Mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Brian K. Cherry  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
P.O. Box 770000, Mail Code B10C  
San Francisco, California 94177

Facsimile: (415) 973-6520  
E-Mail: PGETariffs@pge.com

### **Effective Date**

PG&E requests that this advice filing, upon Energy Division approval, becomes effective on **December 19, 2011**, which is thirty-one (31) days<sup>3</sup> after the date of filing. PG&E submits this as a Tier 2 filing.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the service list for R.10-05-006. Address changes to the General Order 96-B service list and all electronic approvals should be directed 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/>.

A handwritten signature in cursive script that reads "Brian Cherry" followed by a stylized flourish or initials.

Vice President – Regulation and Rates

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<sup>3</sup> The regular 30-day notice period ends on a weekend so the requested effective date is the next business day.

Attachments:

Attachment A: Redline Version of Pacific Gas and Electric Company  
Conformed 2006 Long-Term Procurement Plan  
Replacement Pages

Attachment B: Clean Version of Pacific Gas and Electric Company  
Conformed 2006 Long-Term Procurement Plan  
Replacement Pages

cc: Service List R.10-05-006

# 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 M)**

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: Greg Backens

Phone #: 415-973-4390

E-mail: gab4@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) #: **3952-E**

Tier: 2

Subject of AL: **Update to Pacific Gas and Electric Company's Conformed 2006 Long-Term Procurement Plan - Brokerages and Exchanges Listing**

Keywords (choose from CPUC listing): Procurement

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D. 07-12-052

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: N/A

Is AL requesting confidential treatment? No. If so, what information is the utility seeking confidential treatment for: N/A

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

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

Resolution Required?  Yes  No

Requested effective date: **December 19, 2011**

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

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division  
 Tariff Files, Room 4005  
 DMS Branch  
 505 Van Ness Ave., San Francisco, CA 94102  
 jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company  
 Attn: Brian K. Cherry, Vice President, Regulation and Rates  
 77 Beale Street, Mail Code B10C  
 P.O. Box 770000  
 San Francisco, CA 94177  
 E-mail: PGETariffs@pge.com

Advice Letter 3952-E

Attachment A



**APPENDIX H**  
**UPDATED LIST OF BROKERAGES AND EXCHANGES**





## Brokerages

- Tullett Liberty (acquired Natsource)
- ICAP Energy LLC (acquired APB)
- Prebon
- TFS
- Amerex (recently acquired by GFI Group, Inc.)
- Landmark
- Saddleback
- Anahau Energy LLC (a Women, Minority and Disabled Veteran Business Enterprise (WMDVBE))
- Evolution Markets Inc
- Bluesource Energy, LLC (WMDVBE)
- Energy Trade Management GP, LLC
- Equus Energy Group, LLC
- [Spectron Energy Inc.](#)
- [Karbone Inc.](#)
- [BGC Environmental Brokerage Services, L.P.](#)
- [Edge Energy, LLC](#)

## Exchanges and Futures Commission Merchants

- Intercontinental Exchange (ICE) – Exchange and Cleared (Clear Europe) trades
- New York Mercantile Exchange (NYMEX) – Exchange and Cleared trades
- [Green Exchange, LLC \(GreenX\) – Exchange and Cleared \(CME Clearing\) trades](#)
- Natural Gas Exchange (NGX) – Physical and Financially Cleared Gas Products
- Barclays Capital (allows accessibility to NYMEX, NYMEX Clearing, and ICE Clear Europe)
- J.P. Morgan Securities, LLC, (allows accessibility to NYMEX, NYMEX Clearing, ~~and~~ ICE Clear Europe, [and GreenX/CME Clearing](#))
- Mizuho Securities, USA, (allows accessibility to NYMEX, NYMEX Clearing, ~~and~~ ICE Clear Europe, [and GreenX/CME Clearing](#))
- Wells Fargo Advisors, LLC, (allows accessibility to NYMEX, NYMEX Clearing, and ICE Clear Europe)
- [BNP Paribas Prime Brokerage Inc. \(allows accessibility to ICE Clear Europe and GreenX/CME Clearing\)](#)

Advice Letter 3952-E

Attachment B



**APPENDIX H**  
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- Edge Energy, LLC

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

AT&T	Dept of General Services	Northern California Power Association
Alcantar & Kahl LLP	Douglass & Liddell	Occidental Energy Marketing, Inc.
Ameresco	Downey & Brand	OnGrid Solar
Anderson & Poole	Duke Energy	Praxair
Arizona Public Service Company	Economic Sciences Corporation	R. W. Beck & Associates
BART	Ellison Schneider & Harris LLP	RCS, Inc.
Barkovich & Yap, Inc.	Foster Farms	Recurrent Energy
Bartle Wells Associates	G. A. Krause & Assoc.	SCD Energy Solutions
Bloomberg	GLJ Publications	SCE
Bloomberg New Energy Finance	GenOn Energy, Inc.	SMUD
Boston Properties	Goodin, MacBride, Squeri, Schlotz & Ritchie	SPURR
Braun Blasing McLaughlin, P.C.	Green Power Institute	San Francisco Public Utilities Commission
Brookfield Renewable Power	Hanna & Morton	Seattle City Light
CA Bldg Industry Association	Hitachi	Sempra Utilities
CLECA Law Office	In House Energy	Sierra Pacific Power Company
CSC Energy Services	International Power Technology	Silicon Valley Power
California Cotton Ginners & Growers Assn	Intestate Gas Services, Inc.	Silo Energy LLC
California Energy Commission	Lawrence Berkeley National Lab	Southern California Edison Company
California League of Food Processors	Los Angeles Dept of Water & Power	Spark Energy, L.P.
California Public Utilities Commission	Luce, Forward, Hamilton & Scripps LLP	Sun Light & Power
Calpine	MAC Lighting Consulting	Sunshine Design
Cardinal Cogen	MBMC, Inc.	Sutherland, Asbill & Brennan
Casner, Steve	MRW & Associates	Tabors Caramanis & Associates
Chris, King	Manatt Phelps Phillips	Tecogen, Inc.
City of Palo Alto	McKenzie & Associates	Tiger Natural Gas, Inc.
City of Palo Alto Utilities	Merced Irrigation District	TransCanada
City of San Jose	Modesto Irrigation District	Turlock Irrigation District
Clean Energy Fuels	Morgan Stanley	United Cogen
Coast Economic Consulting	Morrison & Foerster	Utility Cost Management
Commercial Energy	NLine Energy, Inc.	Utility Specialists
Consumer Federation of California	NRG West	Verizon
Crossborder Energy	NaturEner	Wellhead Electric Company
Davis Wright Tremaine LLP	Navigant Consulting	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	Norris & Wong Associates	eMeter Corporation
Defense Energy Support Center	North America Power Partners	
Department of Water Resources	North Coast SolarResources	