

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 10, 2018

Advice Letter 5171-E and 5171-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, 2017).

Dear Mr. Jacobson:

Advice Letter 5171-E and 5171-E-A is effective as of November 29, 2017.

Sincerely,

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

Edward Randolph
Director, Energy Division



Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

October 30, 2017

Advice 5171-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, 2017)

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 2017 in conformance with PG&E’s 2014 BPP approved in D.15-10-031. PG&E’s submittal of this Procurement Transaction Quarterly Compliance Report (“QCR”) for record period July 1, 2017 through September 30, 2017, (Q3, 2017) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Plan Quarterly 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 Advice Letter 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 the QCR includes the following supporting Confidential Attachments:

- Attachment A: Third Quarter 2017 Electric and Natural Gas Transactions
- Attachment B: Third Quarter 2017 Counterparty Information
- Attachment C: Third Quarter 2017 Electric Transactions Summary

Attachment D:	Third Quarter 2017 Natural Gas Transactions Summary
Attachment E:	Third Quarter 2017 Other Transactions
Attachment F:	Third Quarter 2017 Key Briefing Packages
Attachment G:	Third Quarter 2017 Independent Evaluator (IE) Report
Attachment H:	Third Quarter 2017 New Contracts Executed/Contracts Amended
Attachment I:	Summary of Retained Generation Investments Completed During Third Quarter 2017
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 Advice Letter includes confidentiality declarations and a matrix.

The public version of this QCR is provided to the service lists for Rulemakings (“R.”) 16-02-007. The confidential version of the 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 November 20, 2017, which is the first business day 21 days¹ 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:

¹ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
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, 2017, 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.16-02-007. 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.16-02-007 (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: Yvonne Yang

Phone #: (415) 973-2094

E-mail: QXY1@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) #: **5171-E**

Tier: 2

Subject of AL: **Procurement Transaction Quarterly Compliance Filing (Q3, 2017)**

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.15-10-031 and D.03-12-062

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: _____

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. See the attached matrix that identifies all of the confidential information.

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, 2017**

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 21 days¹ 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 B13U
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

¹ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

Advice 5171-E

October 30, 2017

Attachment 1
Narrative

PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT
FOR THE THIRD QUARTER OF 2017

OCTOBER 30, 2017

TABLE OF CONTENTS

A. Introduction.....	1
B. Summary.....	1
C. Master Data Request (MDR) Documentation.....	3
1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.....	3
2. The briefing package provided to the ultimate decision maker.....	3
3. Description of and justification for the procurement processes used to select the transactions.....	3
a) Electric Procurement – Description.....	3
b) Electric Procurement – Justification.....	4
c) Natural Gas Procurement – Description.....	7
d) Natural Gas Procurement – Justification.....	7
e) GHG and Other Commodities.....	9
4. Explanation/justification of the timing of the transactions.....	9
a) Electric Transactions.....	9
b) Natural Gas Transactions.....	10
5. Discussion of the system load requirements/conditions underlying the need for the Quarter’s transactions.....	10
a) PG&E Participation in the CAISO Markets.....	10
b) PG&E-Owned Generation Conditions During Third Quarter 2017.....	11
6. Discussion of how the Quarter’s transactions meet the goals of the risk management strategy reflected in the Plan.....	12
7. Copy of each contract.....	12
8. The valuation results for the contract(s) (for contracts of three months or greater duration).....	12
9. An electronic copy of any data or forecasts used to analyze the transactions.....	12
10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.....	13
11. Any other information sought by the Commission under the Pub. Util. Code.....	13
D. Additional Reporting Requirement Pursuant to D.07-01-039.....	13
E. Cost Allocation Mechanism (CAM).....	13

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 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, 2017 through September 30, 2017 (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.15-10-031.

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. Resource Adequacy (RA) Request for Offers (RFO) for 2018 Products (issued July 17, 2017).
- 2) **Other Competitive Solicitations (Approval Through Separate Advice Filing or Regulatory Process)** – PG&E is seeking approval through separate advice filings or other regulatory processes and are referenced here for informational purposes only:
 - a. Bioenergy Market Adjusting Tariff (bi-monthly auctions), ongoing.
 - b. Renewable Market Adjusting Tariff (bi-monthly auctions), ongoing.
 - c. 2016 Energy Storage Program RFO (issued November 30, 2016).
 - d. 2016 Photovoltaic Program RFO (issued December 6, 2016).
 - e. 2018-2019 Demand Response Auction Mechanism RFO (issued March 10, 2017).
 - f. Distribution Resources Plan (DRP) Demo D- Huron Substation RFO (issued May 16, 2017).
 - g. DRP Demo C- El Nido Substation RFO issued (August 14, 2017).
 - h. Regional Renewable Choice Program RFO (issued September 13, 2017).

3) **Other Procurement Activities (Approval Through the QCR)** – PG&E also seeks approval of transactions executed from the following procurement activities, other than competitive solicitations, through the QCR:

a. Electric Transactions:

- i. California Independent System Operator (CAISO) Allocations and Auctions
 - a. CAISO Monthly Congestion Revenue Rights (CRR) Allocation and Auction Processes
 - b. CAISO’s 2018 Annual CRR Tier 1 and Long-Term Tier Allocation Processes
- ii. CAISO Markets and Processes
 - a. Convergence Bidding
- iii. Direct Bilateral Contracting for Short-Term Products
- iv. Bilateral Negotiated Contracts
- v. Electronic Solicitations
- vi. Electric Hedges (in Compliance with D. 15-10-031)

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 advice filings or regulatory processes and are referenced here for informational purposes only:

- a. Bilaterally negotiated contracts or amendments executed pursuant to other regulatory requirements.
 - i. Java Solar: On August 16, 2017, PG&E and Java Solar executed the First Amendment to the Power Purchase Agreement (PPA). Relevant information is included in the Information Only section of Confidential Attachment H. PG&E has notified its Procurement Review Group (PRG). The Advice Letter is pending approval at the Commission.
 - ii. Hatchet Ridge: On August 23, 2017, PG&E and Hatchet Ridge executed an Amended and Restated PPA. Relevant information is included in the Information Only section of Confidential Attachment H. PG&E has notified its PRG. The Advice Letter is pending approval at the Commission.

C. **Master Data Request (MDR) 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 Policy and Procurement; Aparna Narang, Senior Director, Electric & Gas Acquisition; Martin Wyspianski, Senior Director, Renewable Energy; Marino Monardi, Director, Renewable Transactions; Pete Koszalka, Director, Electric Gas Supply; Joe Lawlor, Director, Portfolio Management; and/or Chris McNeece, Director, Short-Term Electric 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 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

PG&E used BPP-approved electricity procurement transaction processes during the Quarter, including:

- Competitive Solicitations
- CAISO Allocations and Auctions
 - CAISO’s Monthly CRR Allocations and Auctions
 - CAISO’s 2018 Annual CRR Tier 1 and Long-Term Tier Allocation Processes
- CAISO Markets and Processes
 - Convergence Bidding
- Direct Bilateral Contracting for Short-Term Products
- Bilateral Negotiated Contracts
- Electronic Solicitations
- Electric Hedges (in Compliance with D.15-10-031)
- Qualifying Facility/Combined Heat and Power (QF/CHP) Amendments Executed under the Combined Heat and Power (CHP) Settlement *(For informational purposes only)*
- Pro forma contracts executed under the CHP Feed-In Tariffs Program *(For informational purposes only)*

b) Electric Procurement – Justification

- i. For competitive solicitations held by PG&E, describe the process used to rank offers and select winning bid(s).

PG&E did not execute any contracts during this Quarter through competitive solicitations 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 Allocations and Auctions

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 and Helms pumping load) 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, September and October 2017, 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 2017, August 2017 and September 2017, PG&E participated in the CAISO's monthly CRR allocation and auction processes to procure CRRs for August, September and October 2017, respectively.

CAISO Annual CRR Allocation and Auction Process

PG&E participated in the 2018 Allocation Tier 1 and the Long-Term Allocation Tier of the CAISO's 2018 Annual CRR Release Process. Awards from Tier 1 were posted on September 18, 2017. Awards for the Long-Term Tier were posted on September 29, 2017. Results from both Tier 1 and the Long-Term Tier are included in this QCR.

Relevant information for both Monthly and Annual CRR is included in Confidential Attachments F, J, and L.

- CAISO Markets and Processes

- Convergence Bidding

- Based on factors including 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 capacity is purchased to relocate power from one point to another, often necessary outside a Regional Transmission Operator such as the CAISO. Relevant information is included in Confidential Attachment A.

- Bilateral Negotiated Contracts

- Resource Adequacy – During the Quarter, PG&E executed two short-term sales for System RA and one for RA Import Capacity Counting Rights to reduce its long position. PG&E maintains contact with current and potential RA counterparties' to gain a better understanding of their needs for the sale of PG&E's excess capacity products. Sales result in lower procurement costs for PG&E's customers. Relevant information and supporting justifications are included in Confidential Attachment E, F, H, and M.

- Electronic Solicitations

Resource Adequacy – During the Quarter, PG&E executed one contract in accordance of its BPP approved procurement methods and practices for the purchase of System and Local RA capacity. This e-solicitation is in response to the CAISO’s assessment on replacement requirement. Relevant information and supporting justifications are included in Confidential Attachment E, H, and L.

Import Firm Energy – During the Quarter, PG&E executed twenty three transactions of firm energy from select import delivery locations. Relevant information is included in Confidential Attachment A.

- Electric Hedges (in Compliance with D.15-10-031)

PG&E did not conduct any electric hedges during the Quarter.

- 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., Public Utility Regulatory Policies Act PPA for CHP up to 20 megawatts (MW), and As-Available PPA for CHP greater than 20 MW and limited energy production under the Program) 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., Greenhouse Gas (GHG) administration and metering issues) that were not required under the former program. Relevant information is included in the “Informational Purposes Only” Section of Attachment H.

- CHP Feed-in Tariffs (For informational purposes only)

Under the Waste Heat and Carbon Emissions Act, codified as California Public Utilities Code (Pub. Util. 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 (CEC) 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 up to 20 MW, a simplified PPA for CHP generators less than 5 MW, and a further simplified PPA for smaller CHP systems under 500 kilowatts. Relevant information is included in the ‘Informational Purposes Only’ section of Attachment H.

c) *Natural Gas Procurement – Description*

PG&E procured natural gas during the Quarter using various BPP-approved procurement processes and methods, including:

- Competitive Solicitations
- Transparent Exchanges
- Direct Bilateral Contracting for Short-Term Products
- Voice and On-Line Brokers
- 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 through competitive solicitations 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 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 the Natural Gas Exchange (NGX), rather than bilaterally. Physical transactions in the Quarter include next-day and same-day transactions, for delivery periods of one to five days, and monthly transactions for deliveries each day of a calendar month. Relevant information is included in Confidential Attachment A.

Gas Hedges (in Compliance with D.15-10-031) – During the Quarter, PG&E conducted hedging activities that were in compliance with its approved Hedging Plan. 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 over-the-counter 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 Federal Energy Regulatory Commission (IFERC) Gas Market Report. Worksheets

demonstrating PG&E's compliance with D.15-10-031 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 daily index (Gas Daily or CGPR). 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 bi-week 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 (RTM) prices, and/or broker quotes, to inform and conduct these transactions. Relevant information is included in Confidential Attachments A and M, as necessary.

- 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 over-the-counter 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 transactions. Brokers provide access to anonymous bids and offers from both over-the-counter 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 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 electronic solicitations for the purchase of physical gas supply, with delivery terms one month or longer, 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). Relevant information is included in Confidential Attachment A.

e) GHG and 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 through competitive solicitations for approval through this QCR.
- ii. For other transactional methods, provide the documentation supporting the selection of the chosen products.
 - PG&E received its annual allocation of Electric Distribution Utility (EDU) Current Vintage allowances from the California Air Resources Board (CARB) in October 2016. All of the EDU allowances will be consigned into the 2017 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 held a joint allowance auction on August 15, 2017, for Current Vintage and 2020 Vintage allowances.
 - PG&E is authorized to procure GHG products through CARB Auctions and other CPUC-approved procurement processes and methods. PG&E provided information regarding its allowance procurement strategy to the PRG.
 - During the Quarter, PG&E executed bilateral transactions facilitated using a broker for GHG compliance instrument products for PG&E's electric portfolio. All relevant GHG transactional information and supporting justification is included in Confidential Attachments E, F, H, 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 was based on the PG&E Electric Portfolio Quarterly Position Update and Preview of Q3-17 Physical Gas Transactions, presented to the PRG on June 20, 2017. 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 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 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 Third Quarter 2017

PG&E received 118 percent of normal rainfall during the Quarter.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as system conditions and economics allowed. Helms began a combined unit planned outage for Units 1, 2 and 3 on September 10. This combined unit outage is scheduled to be completed on November 19. There were no forced outages lasting longer than 24 hours at Helms during the Quarter.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Bucks Creek Units 1 and 2 (33 and 32 MW), Drum 1 Units 1, 2, 3 and 4 (13.2 MW, 13.2 MW, 13.1 MW and 14.5 MW), Drum 2 Unit 5 (49.5 MW), JB Black Units 1 and 2 (86 MW, each), Rock Creek Units 1 and 2 (63 MW, each) and Salt Springs Unit 1 (11 MW).

In addition there were maintenance outages lasting longer than 72 hours at: Butt Valley (41 MW), Electra Unit 3 (36 MW), Salt Springs Units 1 and 2 (11 MW and 33 MW) and Tiger Creek Units 1 and 2 (29 MW, each).

Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW during the Quarter were incurred at the following facilities: Butt Valley (41 MW), Caribou 1 Units 1 and 3 (25 MW, each), Drum 1 Unit 3 (13.1 MW), Electra Unit 3 (36 MW), Haas Unit 1 (72 MW), Pit 4 Unit 2 (47.5 MW), Pit 5 Units 1, 2, 3 and 4 (40 MW, each), Pit 6 Unit 1 (40 MW) and Poe Unit 2 (60 MW).

At PG&E's fossil combined cycle facilities there were no planned outages at either facility, Gateway Generating Station or Colusa Generating Station, during the Quarter. Also, there were no forced outages greater than 24 hours at the fossil combined cycle facilities during the Quarter.

At PG&E's Humboldt Bay Generating Station there were no planned outages during the Quarter. There were five maintenance outages lasting longer than 72 hours, on Unit 3, Unit 5, Unit 7, Unit 9 and Unit 10 during the Quarter. There

were two forced outages greater than 24 hours, one on Unit 3 and one on Unit 4 during the Quarter.

During Third Quarter 2017, Diablo Canyon Power Plant Unit 1 operated at 99.9 percent capacity factor, experiencing one curtailment to 28 percent power to repair a flow control valve, operating below full power for 2.2 days.

During Third Quarter 2017, Diablo Canyon Power Plant Unit 2 operated at 100.4 percent capacity factor.

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.b. and 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 PG&E seeks 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 Pub. Util. Code.

To the extent that the ORA has requested information for the Quarter as identified in its MDR, this information will be included in PG&E's MDR 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 D.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 As-Available PPA option that qualifies as a CAM resource under the QF/CHP Settlement.

Advice 5171-E

October 30, 2017

Attachment 2
Attachment G – Public Version

**Pacific Gas and Electric
Public Attachment G
Third Quarter 2017**

RFO Independent Evaluator Reports

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

Advice 5171-E

October 30, 2017

Attachment 3
Attachment H – Public Version

**Pacific Gas and Electric
Public Attachment H
Third Quarter 2017**

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	Price	Notional Value (\$)	Confirm File Name
None for the quarter							

**Pacific Gas and Electric
Public Attachment H
Third Quarter 2017**

The table below provides a summary of auction and/or e-solicitation contracts 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/ Signed Date	Product	Term	Volume	Price	Notional Value (\$)	Confirm File Name
NRG Power Marketing LLC (33B038P01)	9/18/2017	System RA (Purchase)					Q3 2017 – Electric E- Solicitations folder

The table below provides a summary of bilateral contracts, including GHG offsets transactions facilitated by brokers, 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/ Signed Date	Product	Term	Volume	Price	Notional Value (\$)	Confirm File Name
							Q3 2017 – GHG Materials folder (See Attachment E)
3 Phases Renewables Inc. (33B113P02)	7/20/2017	System RA (Sale)					Q3 2017 – Bilateral Transactions folder
							Q3 2017 – GHG Materials folder (See Attachment E)
							Q3 2017 – GHG Materials folder (See Attachment E)
							Q3 2017 – GHG Materials folder (See Attachment E)
Direct Energy Business Marketing, LLC (33B233P01)	8/16/2017	System RA (Sale)					Q3 2017 – Bilateral Transactions folder

**Pacific Gas and Electric
Public Attachment H
Third Quarter 2017**

Shell Energy North America (US), L.P. (33B022Q01)	9/28/2017	RA Import Rights (Sale)		Q3 2017 – Bilateral Transactions folder
---	-----------	-------------------------	--	---

Informational purposes only: A summary of QF 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
Berkeley Cogeneration (01C084QAA)	7/24/2017	As Available	7 years	Contract	N/A	2017 ERRA Compliance Filing

Informational purposes only: A summary of the contracts executed and/or amended during the Quarter (non-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
Mini Hydro (33R402RM)	7/10/2017	ReMAT	N/A	Routine Amendment to Existing Agreement	N/A	2017 ERRA Compliance Filing
Madera 1 (33R401RM)	7/13/2017	ReMAT	N/A	Consent to Assignment – Financing	N/A	2017 ERRA Compliance Filing
Java Solar (33R393)	7/19/2017	RPS	N/A	Amendment to Existing Agreement	8/16/2017	Advice Letter 5126-E
Westside Solar (33R375)	7/21/2017	RPS	N/A	Consent to Assignment – Financing	N/A	2017 ERRA Compliance Filing
Angels Powerhouse (33R418RM)	7/21/2017	ReMAT	20 years	Contract	N/A	2017 ERRA Compliance Filing
Citadel Energy Marketing LLC (N-7078)	7/31/2017	NAESB	N/A	Contract	N/A	N/A
BNP Paribas Prime Brokerage Inc.	8/2/2017	Futures Commission Merchant (FCM)	N/A	Routine Amendment to Existing Agreement	N/A	N/A
Bayshore Solar A (33R383)	8/14/2017	RPS	N/A	Consent to Assignment – Financing	N/A	2017 ERRA Compliance Filing

**Pacific Gas and Electric
Public Attachment H
Third Quarter 2017**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Bayshore Solar B (33R384)	8/14/2017	RPS	N/A	Consent to Assignment – Financing	N/A	2017 ERRR Compliance Filing
Bayshore Solar C (33R385)	8/14/2017	RPS	N/A	Consent to Assignment – Financing	N/A	2017 ERRR Compliance Filing
Merced 1 (33R391)	8/16/2017	GTSR - PG&E Solar Choice	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Merced 1 (33R391)	8/16/2017	GTSR - PG&E Solar Choice	N/A	Consent to Assignment – Financing	N/A	2017 ERRR Compliance Filing
Cuyama Solar Array (33R257)	8/16/2017	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2017 ERRR Compliance Filing
Cuyama Solar Array (33R257)	8/16/2017	RPS	N/A	Consent to Assignment - Financing	N/A	2017 ERRR Compliance Filing
Calpine Energy Services, L.P. (33B029P02)	8/16/2017	Resource Adequacy	N/A	Routine Amendment to Existing Agreement	N/A	2017 ERRR Compliance Filing
Hatchet Ridge A&R (33R058-AR)	8/23/2017	RPS	N/A	Amendment to Existing Agreement	10/20/2017	Advice Letter Filing 5163-E
Topaz Solar Farm (33R056)	8/31/2017	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2017 ERRR Compliance Filing
54KR 8me LLC (33R396)	9/1/2017	GTSR - PG&E Solar Choice	N/A	Consent to Assignment - Financing	N/A	2017 ERRR Compliance Filing
RE Gaskell West 3 (33R419)	9/22/2017	RPS	15 years	Contract	9/28/2017	Advice Letter Filing 5146-E
RE Gaskell West 4 (33R420)	9/22/2017	RPS	15 years	Contract	9/28/2017	Advice Letter Filing 5146-E
RE Gaskell West 5 (33R421)	9/22/2017	RPS	15 years	Contract	9/28/2017	Advice Letter Filing 5146-E
Tourmaline Oil Marketing Corporation (N-7080)	9/22/2017	NAESB	N/A	Contract	9/22/2017	N/A
Terzian (33R171AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Helton (33R174AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Christensen (33R177AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing

**Pacific Gas and Electric
Public Attachment H
Third Quarter 2017**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Rogers (33R178AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Fitzjarrell (33R180AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Alvares 2041 (33R187AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Stroing (33R188AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Cotton (33R190AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Jarvis (33R191AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Jardine (33R195AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Smotherman (33R197AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Buzzelle (33R198AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Harris (33R201AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Scherz (33R202AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Hill (33R204AB)	9/29/2017	AB1969/FIT	N/A	Consent to Assignment – General Consent	N/A	2017 ERRR Compliance Filing
Aspiration Solar G (33R376)	9/29/2017	RPS	N/A	Consent to Assignment – Financing	N/A	2017 ERRR Compliance Filing

**Pacific Gas and Electric
Public Attachment H
Third Quarter 2017**

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

Contract/ Counterparty Name	Termination or Expiration¹	Date	Product	Volume (MW)
Cochrane/Empress V. Partnership (GTSA-7025)	Termination	6/29/2017	Liquids Extraction Agreement	N/A
PE - Berkeley, Inc. (01C084)	Expiration	7/26/2017	QF	26.35 MW
Mega Renewables (Silver Springs) (13H036)	Expiration	8/14/2017	QF	0.6 MW
Rio Bravo Fresno (25P026)	Termination	9/7/2017	QF	26.5 MW
Rio Bravo Rocklin (15P028)	Termination	9/7/2017	QF	25 MW
Geary Energy LLC (N-7041)	Termination	9/7/2017	NAESB	N/A
Cogeneration Capital Association (16W011A)	Expiration	9/25/2017	QF	2.68 MW
Cogen Capital (Altamont Power) (16W173)	Expiration	9/25/2017	QF	2.68 WM

¹ A terminated contract is ended before its original expiration date. An expiration date is the natural end of the contract.

Advice 5171-E

October 30, 2017

**Attachment 4
Confidentiality Declaration
and Matrix**

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5171-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 Manager 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, 2017 Advice Letter 5171-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, 2017, 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 5171-E**

**DECLARATION OF PETER E. KOSZALKA
SEEKING CONFIDENTIAL TREATMENT OF 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 Policy and 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, 2017 Advice Letter 5171-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, 2017, 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 5171-E**

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN
CONFIDENTIAL ATTACHMENTS A, B, C, E, H, J, L AND M**

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, 2017 Advice Letter 5171-E, Confidential Attachments A, B, C, 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 October 30, 2017, at San Francisco, California.

/s/

Marianne Aikawa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5171-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2017
 October 30, 2017**

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 5171-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2017
 October 30, 2017**

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 (Electric and Natural Gas Transactions)	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) 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)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5171-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2017
 October 30, 2017**

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 E – Other Transactions (Electric Information) (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.	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) 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	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

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5171-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2017
 October 30, 2017**

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			
Attachment H - Executed Contracts	<p>VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;</p> <p>VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids</p> <p>Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)</p>	<p>Disclosure of information would provide market sensitive information regarding bid strategy and selection.</p> <p>Disclosure of information would provide market sensitive information regarding bid strategy and selection.</p> <p>Residual net short/long is key input to PG&E's confidential forecast of net open position.</p>	<p style="text-align: center;">3 Years;</p> <p style="text-align: center;">Bid information - remain confidential until after final contracts submitted to CPUC for approval</p>
Attachment H Executed Contracts	G.O. 66-C	Counterparty information constitutes confidential business information protected under G.O. 66-C.	Indefinite
Attachment J – System Conditions	<p>Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)</p> <p>G.O. 66-C</p>	<p>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.</p> <p>This attachment also includes information regarding PG&E's trading strategies. The information constitutes confidential business information protected under G.O. 66-C.</p>	<p style="text-align: center;">3 Years</p> <p style="text-align: center;">Indefinite</p>

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5171-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2017
 October 30, 2017**

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 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. The information constitutes confidential business information protected under GO 66-C.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5171-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2017
 October 30, 2017**

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 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)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5171-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2017
 October 30, 2017**

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 M – Executed Contracts	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	Disclosure of information would provide market sensitive information regarding bid strategy and selection.	3 Years

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

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