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Director
Regulatory Relations

Pacific Gas and Electric Company
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Fax: 415-973-3582

January 3, 2019

Advice 5461-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Implementation of SB1090 Diablo Canyon Power Plant

Purpose

Pursuant to Senate Bill 1090 (SB1090), Pacific Gas and Electric Company (PG&E) hereby submits this Advice Letter to seek approval from the California Public Utilities Commission (Commission or CPUC) of funding for the Employee Retention Program and Community Impact Mitigation Program as originally proposed in Application A.16-08-006.

Background

In August 2016, PG&E submitted Application A.16-08-006 (Application) to the Commission. The Application included funding for the Employee Retention Program at Diablo Canyon Power Plant (DCPP) to ensure qualified employees were retained at DCPP up to closure of Units 1 and 2 in 2024 and 2025. In the Application, PG&E requested funding for the Employee Retention Program to annually pay each eligible employee 25% of the employee's base salary during a two tier period (tier 1: 9/1/2016 to 8/31/20; tier 2: 9/1/20 to 8/31/23), up to a forecasted cost of \$352.1 million. The Application also included funding for a Community Impacts Mitigation Program (CIMP) with a requested funding level of \$49.5 million. In December 2016 the Application was supplemented with the CIMP Settlement Agreement¹ which increased funding for the Community Impacts Mitigation Program to \$85 million, consisting of a \$75 million

¹ PG&E filed a joint motion for approval of a settlement on community impacts on December 28, 2016 with the County of San Luis Obispo, the Cities of Arroyo Grande, Atascadero, Morro Bay, Paso Robles, Pismo Beach, San Luis Obispo, the San Luis Coastal Unified School District, Friends of the Earth, Natural Resources Defense Council, Environment California, IBEW 1245, California Coalition of Utility Employees and the Alliance for Nuclear Responsibility ("CIMP Settlement Agreement"). The CIMP Settlement Agreement is referenced in Public Utilities Code Section 712.7(a)(1). D.18-01-022, pp. 31-32.

Essential Services Mitigation Fund (ESMF) that would be distributed to the County² and a \$10 million Economic Development Fund (EDF), which would be distributed to the County and six local cities.

In January 2018, the Commission issued decision D.18-01-022 (Decision) which funded the Employee Retention Program up to \$211.3M and at a reduced level equal to 15% of an employee's base salary. Based upon the specific facts presented and in the absence of legislative authorization, the Decision did not approve funding for the CIMP Settlement Agreement.

On September 19, 2018 Governor Brown signed Senate Bill 1090 into law which among other additions to the Public Utilities Code (PUC) adds PUC Section 712.7 as follows:

712.7 (a) The commission shall approve both of the following:

- (1) The full funding for the community impact mitigation settlement proposed in Application 16-08-006.
 - (2) The full funding for the employee retention program proposed in Application 16-08-006.
- (b) The commission shall ensure that integrated resource plans are designed to avoid any increase in emissions of greenhouse gases as a result of the retirement of the Diablo Canyon Units 1 and 2 powerplant.³
- (c) The commission shall establish an expedited advice letter process for the approval and implementation pursuant to subdivision (a) of the community impact mitigation settlement and the employee retention program.

On November 29, 2018 the Commission issued Decision D.18-11-024 implementing Senate Bill 1090 which includes the following directives:

- (1) PG&E is authorized to collect \$85M in rates to fund the CIMP and the costs of the CIMP should be recovered through the ND NBC⁴
- (2) PG&E is authorized to collect up to an additional \$140.8M in rates in addition to the \$211.3M authorized in D.18-01-022, for a total of up to \$352.1M for its employee

² The \$75 million ESMF includes \$10 million dedicated to an educational foundation designated by the School District. D.18-01-022, p. 32. Under the Settlement Agreement, the County will cause \$2 million of the District's share from each of the first 5 installment payments to be deposited to the account of the District's Educational Foundation. (Settlement Agreement, Attachment A to Appendix 1.)

³ This Advice Letter does not propose to implement Public Utilities Code Section 712.7(b). Presumably, that provision of law will be addressed in the Integrated Resource Plan proceeding.

⁴ D.18-11-024 page 9 and O.P. 1

retention program.⁵ The ratemaking treatment approved in D.18-01-022 remains unchanged.⁶

(3) PG&E may file a tier 1 advice letter after January 1, 2019, to implement the rate increases authorized in this decision.⁷

Cost Recovery for the Community Impacts Mitigation and Employee Retention Programs

In the Application PG&E requested recovery of costs associated with the Employee Retention Program over a seven-year period starting January 1, 2018 and ending December 31, 2024 to be recovered through the Nuclear Decommissioning Adjustment Mechanism (NDAM).⁸ The Decision authorized PG&E to establish a two-way expense-only balancing account (or sub-account) for the Employee Retention Program and determined that these costs should be recovered through generation rates for Diablo Canyon Power Plant. Accordingly, D.18-10-019 the decision modifying the power charge indifference adjustment methodology, states that including the costs of pre-2002 Legacy UOG within the PCIA is consistent with AB117 and SB350.⁹

The purpose of the Employee Retention Subaccount is to track Employee Retention Program expenses incurred compared to the authorized expenses for the Employee Retention Program. PG&E submitted advice letter (AL)-5268-E on April 4, 2018 to establish the Diablo Canyon Retirement Balancing Account (DCRBA) effective January 1, 2018. The DCRBA includes the subaccount Employee Retention Program Subaccount. Actual costs will be recorded in the DCRBA, and a true up between actual revenues collected and actual costs including RF&U will occur annually in the UGBA and will be consolidated with other electric rate changes as part of the Annual Electric True-up (AET) process.

In the motion for approval of the CIMP Settlement Agreement, PG&E requested recovery of costs associated with the Essential Services Mitigation Fund (ESMF) portion of the Community Impacts Mitigation Program (\$75 million) over an eight-year period from January 1, 2018 to December 31, 2025 to be recovered through the NDAM. Recovery would have been through an annual expense only revenue requirement of \$9.5 million from January 1, 2018 through December 31, 2025, to be recovered as part of the Annual Electric True-Up (AET) advice letter through the Nuclear Decommissioning Non Bypassable Charge (ND NBC). Tracking of the actual revenues, including Revenue Fees

⁵ D.18-11-024 O.P. 2

⁶ D.18-11-024 pp 8. In D.18-01-022 pp. 25-26, the Commission determined that the employee retention program costs should be recovered through generation rates

⁷ D.18-11-024 O.P. 3

⁸ In D.18-01-022, the Commission rejected recovery of the reduced level of employee retention costs through the NDAM and instead determined that these costs should be recovered through generation rates for Diablo Canyon Power Plant. D.18-01-022, pp. 25-26.

⁹ D.18-10-019 Conclusion of Law 12

and Uncollectibles (RF&U), collected through the ND NBC rate component would occur through the NDAM.

In the motion for approval of the CIMP Settlement Agreement, PG&E requested recovery of costs associated with the Economic Development Fund (EDF) portion of the CIMP (\$10 million) as a one-time expense. As with the ESMF recovery, the EDF payment would be recovered as part of the AET advice letter through the ND NBC. Tracking of the actual revenues, including RF&U, collected through the ND NBC rate component would occur through the NDAM.

Revenue Requirement for the Community Impacts Mitigation and Employee Retention Programs

The annual revenues that are needed (“Revenue requirement” or “RRQ”) from customers to recover the costs of the CIMP Settlement Agreement and Employee Retention Program are based on traditional cost-of-service ratemaking methods, which are consistent with the methods that PG&E uses in its GRC applications, including its most recent 2020 GRC Application 18-12-009. The final RRQ numbers include a small adjustment to include RF&U. See Table 1 below.

Table 1--Revenue Requirement Calculations (\$ Millions)

Program	2019	2020	2021	2022	2023	2024	2025	Total	Total (with RF&U)	Recovery
Employee Retention:	70.39*	50.29	50.29	50.29	50.29	50.29		321.84		
RF&U	0.80	0.57	0.57	0.57	0.57	0.57				
Retention Costs Total	71.19	50.86	50.86	50.86	50.86	50.86			325.49**	UGBA
CIMP:										
ESMF	18.75*	9.375	9.375	9.375	9.375	9.375	9.375	75.00		
RF&U	0.21	0.106	0.106	0.106	0.106	0.106	0.106			
ESMF Total	18.96	9.480	9.480	9.480	9.480	9.480	9.480		75.846	
EDF	10.00							10.00		
RF&U	0.11									
EDF Total	10.11								10.11	
CIMP Total	29.07	9.480	9.480	9.480	9.480	9.480	9.480		85.96	NDAM

*includes difference between RRQ authorized by D.18-01-022 and D.18-11-024

**\$30.5 million collected in UGBA in 2018

Tariff Revisions

The revised Preliminary Statements for the NDAM and DRCBA are attached to reflect the changes instituted by SB1090.

Rate Impacts

This submittal will increase the revenues collected through the ND NBC rate component associated with the CIMP, and will increase the revenues collected through the generation rate component associated with the employee retention program.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than January 23, 2019, which is 20 days after the date of this submittal. 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 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

Pursuant to D.18-11-024, PG&E is submitting this as a Tier 1 advice submittal and requests that it be disposed effective January 1, 2019.

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 on the service list for A.16-08-006. Address changes to the General Order 96-B service list should be directed to PG&E at email address 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. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List A.16-08-006



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5461-E

Tier Designation: 1

Subject of AL: Implementation of SB1090 Diablo Canyon Power Plant

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-11-024 and D.18-01-022

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:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 1/1/19

No. of tariff sheets: 5

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: Electric Preliminary Statement Part DB - Nuclear Decommissioning Adjustment Mechanism and Electric Preliminary Statement Part HK - Diablo Canyon Retirement Balancing Account

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
43651-E	ELECTRIC PRELIMINARY STATEMENT PART DB NUCLEAR DECOMMISSIONING ADJUSTMENT MECHANISM Sheet 1	42160-E
43652-E	ELECTRIC PRELIMINARY STATEMENT PART HK DIABLO CANYON RETIREMENT BALANCING ACCOUNT (DCRBA) Sheet 2	42162-E
43653-E	ELECTRIC TABLE OF CONTENTS Sheet 1	43649-E
43654-E	ELECTRIC TABLE OF CONTENTS Sheet 14	40589-E
43655-E	ELECTRIC TABLE OF CONTENTS Sheet 17	43319-E



ELECTRIC PRELIMINARY STATEMENT PART DB
NUCLEAR DECOMMISSIONING ADJUSTMENT MECHANISM

Sheet 1

DB. NUCLEAR DECOMMISSIONING ADJUSTMENT MECHANISM (NDAM)

1. **PURPOSE:** The purpose of the NDAM is to record the authorized Diablo Canyon Nuclear Power Plant (Diablo Canyon) and Humboldt Power Plant Nuclear Unit 3 (Humboldt) nuclear decommissioning revenue requirements and Humboldt SAFSTOR operating and maintenance (O&M) revenue requirements, and to provide full recovery of those costs. The NDAM also recovers the actual costs incurred up to \$400,000 to satisfy the requirements of California Senate Bill 968 and Public Utilities Code Section 712.5 Section 3.
2. **APPLICABILITY:** The NDAM balance shall apply to all customer bills for service under all rate schedules and contracts for electric service subject to the jurisdiction of the Commission, except for those rate schedules or contracts specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balance in this account shall be determined through the advice letter process.
4. **RATES:** The NDAM rates are included in the effective rates set forth in each rate schedule as a separate non-bypassable charge.
5. **ACCOUNTING PROCEDURES:** The following entries shall be made each month:
 - a. A debit entry equal to the annual authorized nuclear decommissioning and Humboldt SAFSTOR O&M revenue requirements divided by twelve.
 - b. A debit entry equal to the costs incurred for an independent third-party to conduct an assessment of the closure of the Diablo Canyon Nuclear Plant required by SB 968 and PU Code Section 712.5 Section 3.
 - c. A debit entry equal to PG&E's share of recorded amounts paid to the independent panel for its report on nuclear decommissioning issue as authorized in D.10-07-047, or any other amounts upon subsequent approval by the CPUC.
 - d. A debit entry equal to one-twelfth of the annual authorized Employee Retraining Program budget for Diablo Canyon Power Plant Employees, including Revenue, Fees & Uncollectibles expense (RF&U) (see corresponding entry in the Employee Retraining Subaccount of the Diablo Canyon Retirement Balancing Account per preliminary statement HK, 5c.1).
 - e. A debit entry equal to one-twelfth of the annual funding of the Essential Services Mitigation Fund portion of the Community Impact Mitigation Program (CIMP), including RF&U for the years 2019-2025. (N)
 - f. A one-time debit entry for the Economic Development Fund portion of the CIMP following CPUC approval and expiration of protest period of Advice Letter 5461-E in 2019, including RF&U. (N)
 - g. A credit entry equal to the revenue from the NDAM rates. (T)
 - h. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor. (T)



ELECTRIC PRELIMINARY STATEMENT PART HK
DIABLO CANYON RETIREMENT BALANCING ACCOUNT (DCRBA)

Sheet 2

HK. DIABLO CANYON RETIREMENT BALANCING ACCOUNT (DCRBA)

5. ACCOUNTING PROCEDURE (Cont'd.)

a. Diablo Canyon Capital Depreciation Subaccount (Cont'd.):

3) An entry each month equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

b. Employee Retention Subaccount: The following entries will be made to this subaccount each month or as applicable:

1) A credit entry equal to one-twelfth of the annual Commission-adopted Employee Retention Program budget for DCPD employees; an offsetting entry will be recorded to the UGBA per preliminary statement CG, 5.g, which includes RF&U;

2) A debit entry equal to the expenses incurred for the Employee Retention Program for DCPD employees up to the authorized budget of \$352.1 million;

(N)

3) A debit or credit entry, as appropriate, to transfer the balance to other accounts for recovery in rates, as approved by the Commission; and

4) An entry each month equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

c. Employee Retraining Subaccount: The following entries will be made to this subaccount each month or as applicable:

1) A credit entry equal to one-twelfth of the annual Commission-adopted Employee Retraining Program budget for DCPD employees; an offsetting entry will be recorded to the NDAM per preliminary statement DB, 5.d, which includes RF&U;

(T)

2) A debit entry equal to the expenses incurred for the Employee Retraining Program for DCPD Employees;

3) A debit or credit entry, as appropriate, to transfer the balance to other accounts for recovery in rates, as approved by the Commission; and

4) An entry each month equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page.....		43653-E	(T)
Rate Schedules	42793,42794*,42795,43271,42797*,42798,40921,43322,41965-E		
Preliminary Statements.....	43650,35423,41796, 43654 ,34373,37727, 43655-E		(T)
Rules.....	43022,43023,43210-E		
Maps, Contracts and Deviations.....	37960-E		
Sample Forms..	40925*,37631,41151*,41573*,37632,41152*,41153,37769,41786,36059,37169-E		

(Continued)

<i>Advice Decision</i>	5461-E 18-01-022 and 18-11-024	<i>Issued by</i> Robert S. Kenney <i>Vice President, Regulatory Affairs</i>	<i>Submitted Effective Resolution</i>	January 3, 2019 January 1, 2019
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ELECTRIC TABLE OF CONTENTS

Sheet 14

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements (Cont'd)		
Part DA	Public Purpose Program Revenue Adjustment Mechanism	40547-E
Part DB	Nuclear Decommissioning Adjustment Mechanism (NDAM)	43651-E (T)
Part DG	DWR Power Charge Balancing Account.....	29736,29737-E
Part DI	Procurement Energy Efficiency Balancing Account (PEEBA)	30837,35291-E
Part DN	Municipal Surcharge on Department of Water Resources Sales (DWR Franchise Fees and Uncollectibles).....	26441-E
Part DT	Energy Recovery Bond Balancing Account (ERBBA).....	40548,22876,23404-E
Part DX	Family Electric Rate Assistance Balancing Account (FERABA).....	26859-E
Part DZ	Department of Energy Litigation Balancing Account.....	34367,35459-E

(Continued)

Advice Decision 5461-E
18-01-022 and 18-
11-024

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted Effective Resolution January 3, 2019
January 1, 2019



ELECTRIC TABLE OF CONTENTS

Sheet 17

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements (Cont'd)		
Part GA	Greenhouse Gas Expense Memorandum Account.....	32419,32420-E
Part GB	Greenhouse Gas Revenue Balancing Account.....	35256,40560-E
Part GC	California Energy Systems for the 21 st Century Balancing Account.....	40561-E
Part GD	Smart Grid Pilot Deployment Project Balancing Account.....	32540,32541, 32542-E
Part GE	Statewide Marketing, Education and Outreach Expenditure Balancing Account	37728-E
Part GF	Customer Data Access Balancing Account – Electric.....	33136-E
Part GH	Mobile Home Park Balancing Account - Electric.....	41091,41092-E
Part GI	Energy Data Center Memorandum Account – Electric.....	33940-E
Part GJ	Major Emergency Balancing Account (MEBA)	40563-E
Part GK	SmartMeter™ Opt-Out Program Balancing Account - Electric (SOPBA-E).....	35625,35626,35627-E
Part GL	Hydro Licensing Balancing Account (HLBA)	40564-E
Part GM	Nuclear Regulatory Commission Rulemaking Balancing Account (NRCRBA)	40565-E
Part GN	San Francisco Incandescent Streetlight Replacement Account.....	34364-E
Part GO	Disconnection Memorandum Account - Electric (DMA-E).....	34604-E
Part GP	Green Tariff Shared Renewables Memorandum Account (GTSRMA)	40566,40567, 40567-E
Part GQ	Energy Efficiency Financing Balancing Account – Electric (EEFMA-E)	35292,35293,35294-E
Part GR	Green Tariff Shared Renewables Balancing Account (GTSRBA).....	40569,40570,35377-E
Part GS	Residential Rate Reform Memorandum Account (RRRMA)	40571,40572-E
Part GT	Assembly Bill 802 Memorandum Account - Electric.....	40573-E
Part GU	Z-Factor Memorandum Account (ZFMA-E)	40574-E
Part GV	Distribution Interconnection Memorandum Account (DIMA)	40575-E
Part GY	Electric Vehicle Program Balancing Account (EVPBA)	40576-E
Part HA	Avoided Cost Calculator Memorandum Account.....	40000-E
Part HB	Distribution Resources Plan Demonstration Balancing Account.....	40577-E
Part HC	Rule 20A Balancing Account.....	41736-E
Part HD	Tax Memorandum Account (TMA-E)	41088-E
Part HE	Executive Compensation Memorandum Account (ECMA-E)	40699,40700-E
Part HF	Distribution Resources Plan Tools Memorandum Account (DRPTMA)	42139,42140-E
Part HG	Emergency Consumer Protections Memorandum Account - Electric (WCPMA-E)	43007,43008-E
Part HH	Transportation Electrification Balancing Account (TEBA).....	42575,42576,42577, 42578, 42579,42580,42581, 42582-E
Part HI	Solar On Multifamily Affordable Housing Balancing Account (SOMAHBA).....	41781-E
Part HK	Diablo Canyon Retirement Balancing Account.....	42161, 43652-E
Part HL	Wildfire Expense Memorandum Account (WEMA-E)	42604, 42605-E
Part HQ	Fire Risk Mitigation Memorandum Account (FRMMA)	43314-E
Part HR	Net Energy Metering (NEM) Balancing Account (NEMBA)	43317-E

(T)

(Continued)

Attachment 2

Redlined Tariffs

ELECTRIC PRELIMINARY STATEMENT PART DB
NUCLEAR DECOMMISSIONING ADJUSTMENT MECHANISM

Sheet 1

DB. NUCLEAR DECOMMISSIONING ADJUSTMENT MECHANISM (NDAM)

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2. **APPLICABILITY:** The NDAM balance shall apply to all customer bills for service under all rate schedules and contracts for electric service subject to the jurisdiction of the Commission, except for those rate schedules or contracts specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balance in this account shall be determined through the advice letter process.
4. **RATES:** The NDAM rates are included in the effective rates set forth in each rate schedule as a separate non-bypassable charge.
5. **ACCOUNTING PROCEDURES:** The following entries shall be made each month:
 - a. A debit entry equal to the annual authorized nuclear decommissioning and Humboldt SAFSTOR O&M revenue requirements divided by twelve.
 - b. A debit entry equal to the costs incurred for an independent third-party to conduct an assessment of the closure of the Diablo Canyon Nuclear Plant required by SB 968 and PU Code Section 712.5 Section 3.
 - c. A debit entry equal to PG&E's share of recorded amounts paid to the independent panel for its report on nuclear decommissioning issue as authorized in D.10-07-047, or any other amounts upon subsequent approval by the CPUC.
 - d. A debit entry equal to one-twelfth of the annual authorized Employee Retraining Program budget for Diablo Canyon Power Plant Employees, including Revenue, Fees & Uncollectibles expense (RF&U) (see corresponding entry in the Employee Retraining Subaccount of the Diablo Canyon Retirement Balancing Account per preliminary statement HK, 5c.1).
 - e. A debit entry equal to one-twelfth of the annual funding of the Essential Services Mitigation Fund portion of the Community Impact Mitigation Program (CIMP), including RF&U for the years 2019-2025.
 - f. A one-time debit entry for the Economic Development Fund portion of the CIMP following CPUC approval and expiration of protest period of Advice Letter 5461-E in 2019, including RF&U.
 - ge. A credit entry equal to the revenue from the NDAM rates.
 - hf. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

ELECTRIC PRELIMINARY STATEMENT PART HK
DIABLO CANYON RETIREMENT BALANCING ACCOUNT (DCRBA)

Sheet 2

(N)
(N)

HK. DIABLO CANYON RETIREMENT BALANCING ACCOUNT (DCRBA)

5. ACCOUNTING PROCEDURE (Cont'd.)

a. Diablo Canyon Capital Depreciation Subaccount (Cont'd.):

3) An entry each month equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

b. Employee Retention Subaccount: The following entries will be made to this subaccount each month or as applicable:

- 1) A credit entry equal to one-twelfth of the annual Commission-adopted Employee Retention Program budget for DCPD employees; an offsetting entry will be recorded to the UGBA per preliminary statement CG, 5.g, which includes RF&U;
- 2) A debit entry equal to the expenses incurred for the Employee Retention Program for DCPD employees up to the authorized budget of ~~\$211.3352.1~~ million;
- 3) A debit or credit entry, as appropriate, to transfer the balance to other accounts for recovery in rates, as approved by the Commission; and
- 4) An entry each month equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

c. Employee Retraining Subaccount: The following entries will be made to this subaccount each month or as applicable:

- 1) A credit entry equal to one-twelfth of the annual Commission-adopted Employee Retraining Program budget for DCPD employees; an offsetting entry will be recorded to the NDAM per preliminary statement DB, 5.d, which includes RF&U;
- 2) A debit entry equal to the expenses incurred for the Employee Retraining Program for DCPD Employees;
- 3) A debit or credit entry, as appropriate, to transfer the balance to other accounts for recovery in rates, as approved by the Commission; and
- 4) An entry each month equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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

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