
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 30, 2019

Advice Letter 5506-E

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: 2019 Energy Resource Recovery Account Trigger Amount.

Dear Mr. Jacobson:

Advice Letter 5506-E is effective as of March 27, 2019.

Sincerely,

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

Edward Randolph

Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

March 27, 2019

Advice 5506-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: 2019 Energy Resource Recovery Account Trigger Amount

Pacific Gas and Electric Company (PG&E) hereby submits its annual advice letter calculating the Energy Resource Recovery Account (ERRA) trigger amount for 2019, pursuant to Decisions (D.) 02-10-062, D.04-01-050, D.04-12-048, and D.15-05-008.

Purpose and Background

The purpose of this advice letter is to establish PG&E's 2019 ERRA trigger amount in compliance with Public Utilities Code Section 454.5(d)(3); and D.02-10-062, D.04-01-050, D.04-12-048, and D.15-05-008.

In D.02-10-062, the California Public Utilities Commission (Commission or CPUC) established a "trigger" mechanism to comply with the Public Utilities Code Section 454.5(d)(3) requirement that "any overcollection or undercollection in the power procurement balancing account does not exceed 5 percent of the electrical corporation's actual recorded generation revenues for the prior calendar year excluding revenues collected for the Department of Water Resources."¹ In D.04-01-050, the Commission ordered the utilities to submit their ERRA trigger amount advice letters on or before April 1 of each year.

ERRA Trigger Calculation

Pursuant to D.02-10-062, the 4 percent trigger requires PG&E to file an expedited application requesting approval within 60 days should the balance reach or exceed the 5 percent threshold of prior year recorded generation revenues. PG&E's 2019 ERRA trigger amount – or 4 percent of the actual recorded generation revenues for the prior calendar year – is \$230 million. PG&E's 2019 ERRA threshold amount – 5 percent of the actual recorded generation revenues for the prior calendar year – is \$287 million.

¹ D.02-10-062, p. 54 (quoting Pub. Util. Code § 454.5(d)(3)).

Consistent with PG&E's previous annual ERRA trigger advice letter filings, this year's calculation is based on revenue streams from the balancing accounts that record PG&E's generation revenues. These revenue streams include ERRA, the Modified Transitional Cost Balancing Account (MTCBA), the Utility Generation Balancing Account (UGBA), the New System Generation Balancing Account (NSGBA) and the Green Tariff Shared Renewables Balancing Account (GTSRBA). These balancing accounts include fuel and electric procurement costs, ongoing competition transition costs, the capital and non-fuel operating costs in PG&E's existing generation asset base, cost allocation mechanism costs, and expenses PG&E incurred to procure renewable generation resources for customers participating in the Green Tariff Shared Renewables Program, respectively.

The 2018 revenues from the five accounts and the corresponding 2019 trigger amount are shown below:

2018 ERRA Revenues	\$3,332,041,228
2018 MTCBA Revenues	\$82,453,468
2018 UGBA Revenues	\$2,170,839,158
2018 NSGBA Revenues	\$152,409,638
2018 GTSRBA Revenues	\$5,838,108
Total 2018 Generation Revenues, excluding DWR	\$5,743,581,600
2019 ERRA Trigger (4% of total 2018 revenue)	\$229,743,264
2019 ERRA Threshold Amount (5% of total 2018 revenue)	\$287,179,080

Conclusion

PG&E requests that the Commission approve \$230 million as PG&E's 2019 ERRA trigger amount and \$287 million as PG&E's 2019 ERRA threshold amount. PG&E also requests that this 2019 trigger amount and threshold amount remain in effect until the Commission adopts the 2020 trigger amount and threshold amount, to be submitted by advice letter on or before April 1 in 2020.

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 April 16, 2019, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above. The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code 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

PG&E requests that this Tier 1 advice letter become effective upon date of submittal, which is March 27, 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 shown on the attached list and the parties on the service list for A.18-06-001. 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 filings can also be accessed electronically at:
<http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List A.18-06-001



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) #: 5506-E

Tier Designation: 1

Subject of AL: 2019 Energy Resource Recovery Account Trigger Amount

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.02-10-062, D.04-01-050, D.04-12-048, and D.15-05-008.

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: 3/27/19

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:

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:

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