

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



July 15, 2019

Advice Letter 5556-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: Review Tree Mortality Costs Recorded to the Memorandum Accounts for
February – May 2019**

Dear Mr. Jacobson:

Advice Letter 5556-E is effective as of June 7, 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

June 7, 2019

Advice 5556-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Review Tree Mortality Costs Recorded to the Memorandum Accounts for February – May 2019

Purpose

The purpose of this advice letter is to submit entries made to Pacific Gas and Electric Company's (PG&E) Biomass Renewable Auction Mechanism (BioRAM) Memorandum Account (BioRAMMA) and Senate Bill 859 Biomass Memorandum Account (BioMASSMA) for the months February – May, 2019, consistent with PG&E's request in Advice Letter (AL) 5478-E to submit incremental monthly memo account entries made after January 2019 to the California Public Utilities Commission (Commission or CPUC) for review through a Tier 1 Advice Letter.¹ In addition, this advice letter provides the final net costs that will be transferred from the BioRAMMA and BioMASSMA to the new Tree Mortality Non-bypassable Charge Balancing Account (TMNBCBA) during PG&E's June 2019 accounting close.²

Background

PG&E submitted AL 5478-E on February 19, 2019, requesting, among other things, that the Commission approve a new TMNBCBA and approve the transfer amounts recorded to the existing BioRAMMA and BioMASSMA to the TMNBCBA once it completed the review and approval of the memo account entries.

On May 23, 2019, the Commission approved PG&E's request in AL 5478-E which included the review and approval of costs recorded to the BioRAMMA and BioMASSMA

¹ Advice Letter 5478-E was approved on May 23, 2019 with an effective date of March 21, 2019.

² Advice Letter 5478-E, page 5, PG&E proposed to submit the additional memo account monthly entries along with the final net costs to be transferred to the TMNBCBA in a Tier 1 advice letter, 15 days after the approval of 5478-E.

through January 2019.³ As PG&E indicated in its advice letter, there would be additional monthly entries to the memo accounts after January that would be transferred to the new TMNBCBA and that PG&E would submit these memo account monthly entries and the final net costs to be transferred to the TMNBCBA in a Tier 1 advice letter within 15 days of the approval of AL 5478-E.

BioRAMMA and BioMASSMA Entries for February – May 2019

The BioMASSMA and BioRAMMA memo account entries for the months February – May of 2019 are shown in detailed subledgers and supporting workpapers for both the BioMASSMA and the BioRAMMA, which are included as confidential Appendix A to the Advice Letter. A summary table of the entries recorded in the memo accounts between February and May of 2019 is shown in Table 1 and Table 2 below.

**TABLE 1
BIORAM MEMO ACCOUNT
ENTRIES FEBRUARY 1, 2019 – MAY 31, 2019**

Description	Activity thru Jan-19*	Feb-19	Mar-19	Apr-19	May-19
BioRAMMA Monthly Activity	\$10,283,838	\$ 225,094	\$ 608,317	\$ 752,063	\$ 875,159
Interest	155,511	22,423	22,806	24,265	25,795
BioRAMMA Beginning Balance	10,439,349	10,439,349	10,686,866	11,317,989	12,094,317
BioRAMMA Ending Balance	\$10,439,349	\$10,686,866	\$11,317,989	\$12,094,317	\$12,995,271

* Activity through January 2019 was presented in Advice Letter 5478-E

**TABLE 2
BIOMASS MEMO ACCOUNT
ENTRIES FEBRUARY 1, 2019 – MAY 31, 2019**

Description	Activity thru Jan-19*	Feb-19	Mar-19	Apr-19	May-19
BioMASSMA Monthly Activity	\$31,168,582	\$ 1,750,272	\$ 287,006	\$ 2,103,748	\$ 2,363,789
Interest	404,106	68,952	69,586	72,211	76,377
BioMASSMA Beginning Balance	-	31,572,689	33,391,913	33,748,505	35,924,464
BioMASSMA Ending Balance	\$31,572,689	\$33,391,913	\$33,748,505	\$35,924,464	\$38,364,630

* Activity through January 2019 was presented in Advice Letter 5478-E

³ Advice Letter 5478-E pages 4 and 5.

The net costs that will be transferred to the TMNBCBA during the June business close is the sum of the two memo account balances, which is \$56.36 million.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than June 27, 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 General Order (GO) 96-B, Rule 5.1, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice letter become effective upon date of submittal, which is June 7, 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.16-11-005. 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

Attachment

Confidential Appendix A – BioRAMMA and BioMASSMA Workpapers

cc: Service List A.16-11-005



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) #: 5556-E

Tier Designation: 1

Subject of AL: Review Tree Mortality Costs Recorded to the Memorandum Accounts for February – May 2019

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 #:

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: See attached Confidentiality Declaration and Matrix
 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: Donna Barry, DLBf@pge.com, (415)973-5707

Resolution required? Yes No

Requested effective date: 6/7/19

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:

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

**DECLARATION OF DONNA L. BARRY
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION CONTAINED IN PG&E'S
IMPLEMENTATION OF DECISION 18-12-003
(ADVICE LETTER 5556-E)**

I, Donna Barry, declare:

1. I am a Regulatory Principal in the Revenue Requirements Department within the Regulatory Affairs organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include development of cost recovery proposals, analyses in support of testimony and various reports filed at the Commission. In carrying out these responsibilities, I have acquired knowledge of the generation-related transactions types purchased for PG&E's electric portfolio, which are recorded to the BioRAM Memorandum Account and Biomass Memorandum Account. 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 Decision (D.) 08-04-023, issued in Rulemaking 05-06-040, I make this declaration seeking confidential treatment of Appendix A contained in PG&E's Advice Letter 5556-E submitted in compliance with the disposition of Advice Letter 5478-E on May 23, 2019.

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 data and information covered by Decision 06-06-066. 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 that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on June 7, 2019 at San Francisco, California.

/s/

DONNA L. BARRY

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ADVICE LETTER 5556-E
JUNE 7, 2019

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
Confidential Appendix A	<p>Item VII.G (Bilateral Contract Terms and Conditions – Renewable Resource Contracts under RPS program)</p> <p>Item VII.G (Monthly Procurement Costs recorded in ERR)</p>	<p>This appendix reveals contract terms and conditions (i.e., detail pricing information) and recorded procurement costs that is market sensitive information, which if publicly disclosed could put PG&E at a competitive disadvantage with regard to other market participants and could detrimentally impact PG&E customers. The data cannot be aggregated in a way that allows for partial disclosure.</p>	Three years

Advice 5556-E
June 7, 2019

Confidential Appendix A

BioRAMMA and BioMASSMA Workpapers

**PG&E Gas and Electric
Advice Submittal 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	Engineers and Scientists of California	
Anderson & Poole	Evaluation + Strategy for Social Innovation	SCE
	GenOn Energy, Inc.	SDG&E and SoCalGas
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz & Ritchie	
BART	Green Charge Networks	SPURR
	Green Power Institute	San Francisco Water Power and Sewer
Barkovich & Yap, Inc.	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
	Leviton Manufacturing Co., Inc. Linde	Tecogen, Inc.
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	TerraVerde Renewable Partners
Casner, Steve	Los Angeles Dept of Water & Power	Tiger Natural Gas, Inc.
Cenergy Power	MRW & Associates	
Center for Biological Diversity	Manatt Phelps Phillips	TransCanada
City of Palo Alto	Marin Energy Authority	Troutman Sanders LLP
	McKenzie & Associates	Utility Cost Management
City of San Jose	Modesto Irrigation District	Utility Power Solutions
Clean Power Research	Morgan Stanley	Utility Specialists
Coast Economic Consulting	NLine Energy, Inc.	
Commercial Energy	NRG Solar	Verizon
County of Tehama - Department of Public Works		Water and Energy Consulting
Crossborder Energy		Wellhead Electric Company
Crown Road Energy, LLC		Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP		Yep Energy
Day Carter Murphy		
	Office of Ratepayer Advocates	
Dept of General Services	OnGrid Solar	
Don Pickett & Associates, Inc.	Pacific Gas and Electric Company	
Douglass & Liddell	Peninsula Clean Energy	