

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



December 26, 2019

**Advice Letter 5600-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: Procurement Transaction Quarterly Compliance Submittal (Q2, 2019)**

Dear Mr. Jacobson:

Advice Letter 5600-E is effective as of August 29, 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



**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

July 30, 2019

**Advice 5600-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Procurement Transaction Quarterly Compliance Submittal (Q2, 2019)**

**Purpose**

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) its compliance submittal for the second quarter of 2019 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 April 1, 2019 through June 30, 2019, (Q2, 2019) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction 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: Second Quarter 2019 Electric and Natural Gas Transactions  
Attachment B: Second Quarter 2019 Counterparty Information  
Attachment C: Second Quarter 2019 Electric Transactions Summary

Attachment D:	Second Quarter 2019 Natural Gas Transactions Summary
Attachment E:	Second Quarter 2019 Other Transactions
Attachment F:	Second Quarter 2019 Key Briefing Packages
Attachment G:	Second Quarter 2019 Independent Evaluator (IE) Reports
Attachment H:	Second Quarter 2019 Contracts Executed/Contracts Amended
Attachment I:	Summary of Retained Generation Investments Completed During Second Quarter 2019
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 Second 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.

This submittal will 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 August 19, 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, 4<sup>th</sup> 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**

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is August 29, 2019, which is 30 days after the date of submittal.

### **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



# 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: OXY1@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) #: 5600-E

Tier Designation: 2

Subject of AL: Procurement Transaction Quarterly Compliance Submittal (Q2, 2019)

Keywords (choose from CPUC listing): Compliance, Procurement

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted 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: 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 matrix that identifies all of the 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: Jay Bukowski (415) 973-1727, John Ulloa (415) 973-0535

Resolution required?  Yes  No Marianne Aikawa (415) 973-0375

Requested effective date: 8/29/19 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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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](mailto:PGETariffs@pge.com)

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

Advice 5600-E  
July 30, 2019

# **Attachment 1**

## **Narrative**

**PACIFIC GAS AND ELECTRIC COMPANY**  
**PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT**  
**FOR THE SECOND QUARTER OF 2019**

**July 30, 2019**

## TABLE OF CONTENTS

A. Introduction.....	1
B. Summary.....	1
1. Competitive Solicitations (Approval Through the Quarterly Compliance Report).....	1
2. Other Competitive Solicitations (Approval Through Separate Advice Filing or Regulatory Process) .....	2
3. Other Procurement Activities (Approval Through the QCR).....	2
a) Electric Transactions.....	2
b) Gas Transactions.....	3
4. Other Procurement Activities (Approval Through Separate Advice Filing or Regulatory Process) .....	3
C. Master Data Request (MDR) Documentation.....	3
1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.....	4
2. The briefing package provided to the ultimate decision maker.....	4
3. Description of and justification for the procurement processes used to select the transactions.....	4
a) Electric Procurement – Description .....	4
b) Electric Procurement – Justification .....	5
c) Natural Gas Procurement – Description .....	8
d) Natural Gas Procurement – Justification .....	8
e) GHG and Other Commodities .....	10
4. Explanation/justification of the timing of the transactions.....	11
a) Electric Transactions.....	11
b) Natural Gas Transactions.....	11
5. Discussion of the system load requirements/conditions underlying the need for the Quarter’s transactions. ....	11
a) PG&E Participation in the CAISO Markets .....	11
b) PG&E-Owned Generation Conditions During Second Quarter 2019 .....	12
6. Discussion of how the Quarter’s transactions meet the goals of the risk management strategy reflected in the Plan. ....	13
7. Copy of each contract. ....	13
8. The valuation results for the contract(s) (for contracts of three months or greater duration).....	14
9. An electronic copy of any data or forecasts used to analyze the transactions. ....	14

TABLE OF CONTENTS  
(CONTINUED)

10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs. ....14

11. Any other information sought by the Commission under the Pub. Util. Code. ....14

D. Additional Reporting Requirement Pursuant to D.07-01-039 .....14

E. Cost Allocation Mechanism (CAM).....15

## **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 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 Confidential 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 April 1, 2019 through June 30, 2019 (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.

On January 16, 2019, PG&E filed Advice Letter 5469-E which revised its Appendix G, (Greenhouse Gas (GHG) Procurement Plan) and Appendix I (Congestion Revenue Rights) of its BPP, and continued temporary management of Appendix E (Electric Portfolio Hedging Plan) transactions due to its impaired credit ratings. Advice Letter 5469-E became effective as of January 16, 2019. PG&E further updated the Commission on actions according to its Hedging Plan on March 27, 2019, with Advice Letter 5507-E. Advice Letter 5507-E became effective as of April 1, 2019.

PG&E will manage its BPP as described in Confidential Attachment A (Proposed Edits to PG&E's Bundled Procurement Plan) of Advice Letters 5469-E and 5507-E until the Commission approves further revisions to PG&E's BPP. PG&E's BPP modifications described in Confidential Attachments to Advice Letters 5469-E and 5507-E will benefit PG&E's customers by enabling PG&E to prioritize providing safe, reliable, affordable, and environmentally sensitive electric and gas service. Please refer to the impacted Confidential Attachments E, F, J and L of this Quarterly Compliance Report (QCR) for specifics.

## **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)**
  - a. None for the quarter.

## 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 for Category 1 and 2, monthly auctions for Category 3), ongoing
- b. Renewable Market Adjusting Tariff (ReMAT) (bi-monthly auctions)<sup>1</sup>
- c. 2019 Bundled Renewable Portfolio Standard (RPS) Sale Solicitation (issued March 29, 2019)
- d. Tree Mortality Non-Bypassable Bundled RPS Energy Sale (issued March 25, 2019)
- e. 2019 Distribution Investment Deferral Framework Request for Offers (RFO) (issued February 21, 2019)
- f. 2018 Integrated Distributed Energy Resources RFO (issued November 14, 2018)
- g. Winter Regional Renewable Choice RFO (issued November 13, 2018)
- h. 2018 Oakland Clean Energy Initiative (issued April 13, 2018)

## 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 Processes
- ii. CAISO Markets and Processes*
  - a. Convergence Bidding
- iii. Direct Bilateral Contracting for Short-Term Products*
- iv. Bilateral Negotiated Contracts*
- v. Electronic Solicitations issued by PG&E*
- vi. Market Request for Proposal (RFP)*
- vii. Transparent Exchange*

---

<sup>1</sup> The ReMAT Program was suspended on December 15, 2017 by the Executive Director of the CPUC.

***b) Gas Transactions***

- i. Transparent Exchanges*
- ii. Direct Bilateral Contracting for Short-Term Products*
- iii. Voice Brokers*
- iv. Electronic Solicitations*
- v. Cashouts*

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. EIF Haypress, LLC: Pursuant to Qualifying Facility/Combined Heat and Power (QF/CHP) Settlement,<sup>2</sup> PG&E executed a Public Utility Regulatory Policies Act (PURPA) Power Purchase Agreement (PPA) with EIF Haypress, LLC on April 30, 2019. Relevant information is included in the Informational Only section of Attachment H. Advice Letter 5592-E was filed on July 24, 2019.
  - ii. Aera Energy LLC (South Belridge): Pursuant to QF/CHP Settlement,<sup>2</sup> PG&E executed an As-Available CHP PPA with Aera Energy LLC on May 23, 2019. Relevant information is included in the Informational Only section of Attachment H. Advice Letter 5592-E was filed on July 24, 2019.

**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.

---

<sup>2</sup> See Decision Adopting Proposed Settlement, D.10-12-035.

**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; Gillian Clegg, Senior Director, Electric and Gas Acquisition; Martin Wyspianski, Senior Director, Energy Portfolio Procurement and Policy; Marino Monardi, Director, Structured Energy Transactions; Joe Lawlor, Portfolio Management; Anna Foglesong, Director, Energy Transactions and Legislative Policy; Chris McNeece, Director, Short-Term Electric Supply; and/or John Ulloa, Manager, Electric Gas 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 Markets and Processes

- Direct Bilateral Contracting for Short-Term Products
- Bilateral Negotiated Contracts
- Electronic Solicitations issued by PG&E
- Market RFP
- Transparent Exchanges, Voice and On-Line Brokers
- QF/CHP Amendments Executed under the 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).*

None for the Quarter.

- 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 Process

PG&E procures CRRs to narrow the distribution of PG&E’s energy procurement costs due to expected 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 May 2019, June 2019, and July 2019, remained exposed to congestion risk, and, therefore, participated in the CAISO’s monthly CRR allocation process to obtain CRRs to mitigate this risk. In April 2019, May 2019, and June 2019, PG&E participated in the CAISO’s monthly

CRR allocation processes to procure CRRs for May 2019, June 2019, and July 2019, respectively.

PG&E's procurement during the Quarter was consistent with PG&E's updates to its BPP Congestion Revenue Rights (Appendix I) filed in Advice Letter 5469-E, effective January 16, 2019.

Relevant information for the Monthly CRRs is included in Confidential Attachments F, J and L.

- CAISO Markets and Processes

- Convergence Bidding

- PG&E suspended Convergence Bidding activities after trade day May 26, 2018. As of April 1, 2018, all Convergence Bidding activities remain suspended. Relevant information is included in Confidential Attachment 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

- Import Energy – During the Quarter, PG&E executed firm energy transactions at selected import delivery locations. Relevant information is included in Confidential Attachment A.

- Electronic Solicitations

- Resource Adequacy (RA) – During the Quarter, PG&E executed (1) System RA purchase transactions; (2) Import Allocation Rights sales, which had all evaluations and communications with participants monitored by an IE; and (3) Unit Specific System RA sales. All solicitations were made in accordance with its BPP approved procurement methods and practices to meet CAISO's requirements. Relevant information and supporting justification are included in Confidential Attachments E, F, G, H and L.

- Import Energy – During the Quarter, PG&E executed firm energy transactions at selected import delivery locations. Relevant information is included in Confidential Attachment A.

- Electric Financial Transactions (in Compliance With D.15-10-031 and Advice Letter 5507-E) – PG&E executed electric financial transactions during the Quarter via E-Solicitation and Transparent

Exchange (including voice and on-line brokers). Relevant information is included in Confidential Attachments A and L.

- Market RFP

During the Quarter, PG&E participated in Calpine Energy's Market RFP and executed a System RA transaction. Relevant information is included in Confidential Attachments E, F and H.

- Transparent Exchange, Voice and On-Line Brokers

Resource Adequacy – During the Quarter, PG&E executed a transaction to purchase System RA. Relevant information and supporting justifications are included in Confidential Attachments E and H.

Electric Financial Transactions (in Compliance With D.15-10-031 and Advice Letter 5507-E) – PG&E executed electric financial transactions during the Quarter via E-Solicitation and Transparent Exchange (including voice and on-line brokers). Relevant information is included in Confidential Attachments A and L.

- QF/CHP Legacy Contracts (for informational purposes only)

Under the QF/CHP Program, QF generators may enter into one of two pro forma PPAs (i.e., PURPA PPA for QFs up to 20 megawatts (MW), and As-Available PPA for CHP up to 20 MW). 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., 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
- Cashouts

**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 buys and sells 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 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 of transactions executed via Transparent Exchanges during the QCR period is included in Confidential Attachment A.

Gas Financial Transactions (in Compliance With D.15-10-031) – PG&E’s procurement during the Quarter is consistent with PG&E’s updates to its BPP Hedging Plan (Appendix E) filed in Advice Letter 5507-E, effective April 1, 2019.

Gas Financial Transactions are 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 FERC (IFERC) Gas Market Report. Details demonstrating PG&E's compliance with D.15-10-031 during the QCR period are included in Confidential Attachments J and L. Relevant information executed during the QCR period is included in Confidential Attachment A.

- Direct Bilateral Contracting for Short-Term Products

Commodity Purchases/Sales – PG&E buys and sells 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 executed during the QCR period is included in Confidential Attachments A and M.

- Voice Brokers – Gas Financial Transactions

PG&E executes natural gas financial transactions (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 of transactions executed via voice brokers during the QCR period is included in Confidential Attachment A.

- Voice Brokers – Commodity Purchases/Sales

PG&E executes 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 of transactions executed via voice brokers during the QCR period is included in Confidential Attachment A.

- Electronic Solicitations

Conducted via Instant Messaging and Telephone – PG&E conducts 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 of transactions executed via electronic solicitation during the QCR period is included in Confidential Attachment A.

- Cashouts: Commodity Purchases/Sales

Cashouts are used by gas pipelines, according to their tariff, to cure certain imbalances between supply and demand. When a pipeline applies a cashout, it results in a commodity transaction.

***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 for the 2019 year from the California Air Resources Board (CARB) in October 2018. All of the EDU allowances will be consigned into the 2019 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 May 14, 2019, for Current 2016 and 2019 Vintage and Advance 2022 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 bilateral market procurement strategy to the PRG.
- PG&E's procurement during the Quarter was consistent with PG&E's updates to its BPP GHG Procurement Plan filed in Advice Letter 5469-E, effective January 16, 2019.

All relevant GHG transactional information and supporting justification is included in Confidential Attachments E 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. Detailed explanation/justification for the timing of the transactions is included in Confidential Attachments E and 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, presented to the PRG on June 19, 2019. 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 Second Quarter 2019***

PG&E received 130 percent of normal rainfall during the Quarter.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as system conditions and economics allowed. There was one planned outage at Helms during the Quarter for routine spring maintenance on Unit 2. There were no maintenance outages events at Helms lasting longer than 72 hours during the Quarter. There were two forced outage events at Helms Unit 1 lasting longer 24 hours due to equalizing line leaks.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Belden (125 MW), Butt Valley (41 MW), Electra Unit 3 (36 MW), Kings River Unit 1 (52 MW), Pit 3 Unit 3 (23.4 MW), Pit 4 Unit 2 (47.5 MW), Pit 7 Units 1 and 2 (112 MW total), and Tiger Creek Units 1 and 2 (58 MW total). Six of the planned outages started in the previous Quarter or earlier and one will continue into the next Quarter. In addition, there were six maintenance outages lasting longer than 72 hours which included: Caribou 1 Units 1, 2 and 3 (75 MW total), Caribou 2 Units 4 and 5 (120 MW total), and Haas Unit 2 (72 MW).

Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW during the Quarter were incurred at the following facilities: Balch 2 Unit 3 (52.5 MW), Butt Valley (41 MW), Caribou 1 Unit 3 (25 MW), Drum 1 Unit 4 (14.5 MW), Electra Unit 3 (36 MW), Pit 3 Unit 3 (23.4 MW), and Rock Creek Unit 1 (63 MW).

At PG&E's fossil combined cycle facilities there were two planned outages and no maintenance outages during the Quarter. The annual outages occurred at Colusa Combined Cycle Facility and Gateway Combined Cycle Facility. There was one forced outage greater than 24 hours at Gateway Combined Cycle Facility lasting approximately 10 days starting June 3, 2019 due to a ground fault on the steam turbine isophase bus.

At PG&E's Humboldt Bay Generating Station (HBGS) there were no planned outages during the Quarter. There were four maintenance outages lasting longer than 72 hours during the Quarter on Units 3, 7 and 9. There was one forced outage event at HBGS lasting longer than 24 hours during the Quarter on Unit 10.

During Second Quarter 2019, Diablo Canyon Power Plant (DCPP) Unit 1 operated at 102.1 percent capacity factor, operating at full power all quarter.

During Second Quarter 2019, DCPP Unit 2 operated at 97.3 percent capacity factor, experiencing one planned 6-day curtailment to 50 percent power to perform ocean cooling water system tunnel cleaning of marine growth.

**6. Discussion of how the Quarter's transactions meet the goals of the risk management strategy reflected in the Plan.**

As described in Sections 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 Public Advocates Office 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 Public Advocates Office 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 one As-Available CHP PPA that qualifies as a CAM resource under the QF/CHP Settlement. The As-Available CHP PPA with Aera Energy LLC is eligible to have its net capacity costs recovered through CAM because it is a CHP resource executing a Settlement PPA.

Advice 5600-E  
July 30, 2019

**Attachment 2**  
**Attachment G – Public Version**

**Public Version Attachment G**

**Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Second Quarter 2019**

**Independent Evaluation Reports**

<b>Contract Description/ Counterparty Name</b>	<b>Contract Term</b>	<b>Execution Date</b>	<b>IE Report Workpaper Citation</b>
Independent Evaluator Report: 2019 RA Import Allocation Rights RFO			2019 IAR RFO IE Report 07182019 _redacted final.pdf



# **PACIFIC GAS & ELECTRIC**

## Independent Evaluator Report 2019 Import Allocation Rights E- Solicitation

July 2019

---

**PA Regional Office:**  
PA Consulting Group  
US Bank Tower,  
633 W 5th Street, 26th Floor  
Los Angeles, CA 90071  
USA  
Tel: +1 213 689 1515  
Fax: +1 213 486 4801  
[www.paconsulting.com](http://www.paconsulting.com)

**Version no:**

1.0

**Prepared by:** C. Janecek

# INDEPENDENT EVALUATOR REPORT

---

PA Consulting Group, Inc. (PA) served as the Independent Evaluator (IE) for the Pacific Gas & Electric (PG&E) August-December 2019 Import Allocation Rights E-Solicitation (2019 IAR Solicitation or the E-Solicitation). This report provides a summary of PA's evaluation of the process from the drafting of the E-Solicitation documents through to the recommendation of selected bids and negotiations of contracts submitted to the California Public Utilities Commission (CPUC or Commission).

## Overview of solicitation

PG&E issued its 2019 IAR E-Solicitation on May 15, 2019.

Through this E-Solicitation, PG&E offered to sell and requested bids for Import Allocation Rights (IAR) for August and October-December 2019. For the IAR, PG&E solicited interest and offers to purchase IAR in monthly transactions.

PG&E did not specify the amounts of IAR capacity it wished to sell. Ultimately, PG&E received [REDACTED] to the E-Solicitation and contracted for [REDACTED] of IAR sales.

## PA's IE Report

PA's IE reports typically follow the CPUC's Solicitation Shortlist Report Templates. However, [REDACTED] PG&E and PA agreed that an abbreviated IE report is appropriate, covering summaries of the typical sections in an IE report.

## Main IE activities during solicitation

PA's role in PG&E's 2019 IAR E-Solicitation spanned approximately one month from May to June 2019. PA performed the role of IE and was involved from PG&E's development of the Market Notice materials through the selection of the bid and the negotiation of the IAR confirm. PA ensured that the procedures followed by PG&E were aligned with the process it established in its E-Solicitation and provided fair and equitable treatment of all bids. PA was in regular contact with PG&E staff throughout the process, addressing PG&E's questions, identifying and resolving potential issues, and providing recommendations throughout the process. The following provides a summary of PA's main activities during this solicitation:

- PA participated in teleconference meetings with PG&E held prior to the issuance of the E-Solicitation to review all aspects of the protocol for the E-Solicitation bid conformance, evaluation and selection process.

- PA reviewed and commented on drafts of the Market Notice documents prior to PG&E issuing the E-Solicitation.
- PA received all communications between PG&E and bidders. PA directly received all of the emails, including bids that were sent to and received from bidders.
- PA reviewed [REDACTED] received and discussed with the PG&E team the team's intent to shortlist [REDACTED].
- PA reviewed the draft and executed confirmation documents related to [REDACTED]

## Adequacy of PG&E's Outreach

PG&E's outreach included notifications via to PG&E's wholesale RFO distribution list and PG&E's e-solicitation RA list. Because the E-Solicitation involved IAR products, there was a limited number of counterparties who could be expected to participate in the E-Solicitation. PA believes that PG&E extended adequate outreach for the 2019 IAR E-Solicitation.

## PG&E's Bid Evaluation Methodology

PG&E primarily relied on a quantitative evaluation of each bidder's proposed volumes of IAR desired and the bidders proposed price for each product. Had competing bidders made offers for IAR in the same month that exceeded PG&E's available IAR in that month, PG&E would have selected the higher priced bidder. However, in this E-Solicitation, [REDACTED] so that situation did not occur. PA found PG&E's bid evaluation methodology appropriate for this E-Solicitation.

## PG&E's Shortlisting and Negotiations of Confirms

As noted, [REDACTED].

The Market Notice for this E-Solicitation had specified that PG&E would only contract with bidders under an EEI Master Agreement and provided the Standard EEI Import Allocation Rights Confirm. During the confirm negotiations, [REDACTED]

## Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2019 IAR E-Solicitation.

Some specific findings are noted below:

- PG&E in no way prevented PA from observing its process and analyzing its methods and did not interfere with PA's conducting the Independent Evaluation.
- PA finds that PG&E's outreach for this E-Solicitation was adequate and that the Market Notice materials were clear and concise related to the E-Solicitation.

- Based on our review of PG&E's analysis, our participation in calls and meetings and other IE activities, PA finds that PG&E conducted the 2019 IAR E-Solicitation fairly.



CONSULTING  
TECHNOLOGY  
INNOVATION

We are an employee-owned firm of over 2,500 people, operating globally from offices across North America, Europe, the Nordics, the Gulf and Asia Pacific.

We are experts in energy, financial services, life sciences and healthcare, manufacturing, government and public services, defence and security, telecommunications, transport and logistics.

Our deep industry knowledge together with skills in management consulting, technology and innovation allows us to challenge conventional thinking and deliver exceptional results with lasting impact.

**Corporate headquarters**

123 Buckingham Palace Road  
London SW1W 9SR  
United Kingdom  
Tel: +44 20 7730 9000

**paconsulting.com**

This document has been prepared by PA on the basis of information supplied by the client and that which is available in the public domain. No representation or warranty is given as to the achievement or reasonableness of future projections or the assumptions underlying them, management targets, valuation, opinions, prospects or returns, if any. Except where otherwise indicated, the document speaks as at the date hereof.

© PA Knowledge Limited 2014.  
All rights reserved.

This document is confidential to the organisation named herein and may not be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying or otherwise without the written permission of PA Consulting Group. In the event that you receive this document in error, you should return it to PA Consulting Group, 123 Buckingham Palace Road, London SW1W 9SR. PA accepts no liability whatsoever should an unauthorised recipient of this document act on its contents.

Advice 5600-E  
July 30, 2019

**Attachment 3**  
**Attachment H – Public Version**

**Confidential Attachment H**

**Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Second Quarter 2019**

**New Contracts Executed and Amended During the Quarter**

The table below provides a summary of Request for Offer (RFO) and Competitive 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.

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Volume</b>	<b>Price</b>	<b>Notional Value (\$)</b>	<b>Confirm File Name</b>
None for the Quarter							

The table below provides a summary of e-solicitation and/or Market RFP contracts executed through competitive processes during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of contracts subject to this QCR filing is included.

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Volume</b>	<b>Price</b>	<b>Notional Value (\$)<sup>1</sup></b>	<b>Confirm File Name</b>
Sonoma Clean Power Authority (33B226R03)	4/12/2019	System RA (Sale)		45 MW			Q2 2019 e- solicitations

<sup>1</sup> Rounded to the nearest whole dollar.

**Confidential Attachment H**

**Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Second Quarter 2019**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) <sup>1</sup>	Confirm File Name
Calpine Energy Services, L.P. (33B029R02)	5/14/2019	System RA (Purchase)		120 MW			Q2 2019 Market RFP
				120 MW			
EDF Trading North America, LLC (33B200R03)	6/17/2019	System RA (Purchase)		60 MW			Q2 2019 e- solicitations
				240 MW			
City of San Jose (San Jose Clean Energy) (33B247R04)	6/20/2019	Import Allocation Rights (Sale)		100 MW			Q2 2019 e- solicitations

The table below provides a summary of bilateral contracts (including GHG offsets transactions facilitated by brokers), and significant exchange-placed trades, (including RA transactions facilitated by brokers) 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 <sup>2</sup>	Notional Value (\$)	Confirm File Name
Exelon Generation Company, LLC (33B007R02)	4/17/2019	System RA (Purchase)		70 MW			Q2 2019 Broker

<sup>2</sup> Price does not reflect broker fees.

**Confidential Attachment H**

**Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Second Quarter 2019**

**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
EIF Haypress (Lwr) (15H005)	4/10/2019	QF	20 days	Extension Agreement	N/A	2019 ERRA Compliance
EIF Haypress (Mdl) (15H006)	4/10/2019	QF	16 days	Extension Agreement	N/A	2019 ERRA Compliance
EIF Haypress, LLC (15H005QPA)	4/30/2019	PURPA	8 months	Contract	7/24/19	Advice Letter Filing 5592-E
Aera Energy LLC (South Belridge) (25C049QAA2)	5/23/2019	As-Available	7 years	Contract	7/24/19	Advice Letter Filing 5592-E

**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
RE Gaskell West 5 (33R421)	4/3/2019	RPS	N/A	Consent to Assignment – Financing	N/A	2019 ERRA Compliance Filing
RE Gaskell West 4 (33R420)	4/3/2019	RPS	N/A	Consent to Assignment – Financing	N/A	2019 ERRA Compliance Filing
RE Gaskell West 3 (33R419)	4/3/2019	RPS	N/A	Consent to Assignment – Financing	N/A	2019 ERRA Compliance Filing
City of San Jose (33B247R01)	4/12/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRA Compliance Filing

**Confidential Attachment H**

**Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Second Quarter 2019**

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Type of Transaction</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
Monterey Bay Community Power Authority (33R461)	5/6/2019	RPS Energy REC Sales	1 year	Contract	6/4/2019	Advice Letter Filing 5554-E
Shell Energy North America (US), L.P. (33R462)	5/6/2019	RPS Energy REC Sales	2 years	Contract	6/4/2019	Advice Letter Filing 5554-E
Silicon Valley Clean Energy Authority (33R464)	5/6/2019	RPS Energy REC Sales	1 year	Contract	6/4/2019	Advice Letter Filing 5554-E
East Bay Community Energy Authority (33R463)	5/6/2019	RPS Energy REC Sales	2 years	Contract	6/4/2019	Advice Letter Filing 5554-E
Direct Energy Business Marketing, LLC (33R465)	5/6/2019	RPS Energy REC Sales	2 years	Contract	6/4/2019	Advice Letter Filing 5554-E
Lone Oak Dairy Digester (33R466BIO)	5/8/2019	BioMAT	20 years	Contract	N/A	2019 ERRA Compliance Filing
WCW Generator 1 (33R467BIO)	5/8/2019	BioMAT	20 years	Contract	N/A	2019 ERRA Compliance Filing
Avalon Dairy Digester (33R468BIO)	5/8/2019	BioMAT	20 years	Contract	N/A	2019 ERRA Compliance Filing
Lisa Boone Harris (33R469BIO)	5/8/2019	BioMAT	20 years	Contract	N/A	2019 ERRA Compliance Filing
RuAnn Dairy Digester (33R470BIO)	5/8/2019	BioMAT	20 years	Contract	N/A	2019 ERRA Compliance Filing
Clean Power Alliance of Southern California (33R471)	5/13/2019	RPS Energy REC Sales	1 year	Contract	6/4/2019	Advice Letter Filing 5554-E
Avangrid Renewables, LLC (33R472)	5/14/2019	RPS Energy REC Sales	1 year	Contract	6/4/2019	Advice Letter Filing 5554-E

**Confidential Attachment H**

**Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Second Quarter 2019**

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Type of Transaction</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
City of San Jose (San Jose Clean Energy) (33R473)	5/14/2019	RPS Energy REC Sales	2 years	Contract	6/4/2019	Advice Letter Filing 5554-E
Peninsula Clean Energy Authority (33R474)	5/17/2019	RPS Energy REC Sales	2 years	Contract	6/4/2019	Advice Letter Filing 5554-E
Peninsula Clean Energy Authority (33R475)	5/17/2019	RPS Energy REC Sales	4 years	Contract	6/14/2019	Advice Letter Filing 5561-E
Powerex Energy Corp. (33R476)	5/17/2019	RPS Energy REC Sales	2 years	Contract	6/4/2019	Advice Letter Filing 5554-E
Exelon Generation Company, LLC (33R477)	5/21/2019	RPS Energy REC Sales	2 years	Contract	6/4/2019	Advice Letter Filing 5554-E
Six One Commodities (N-7086)	5/22/2019	NAESB	N/A	Contract	N/A	N/A
Marin Clean Energy (33R478)	5/24/2019	RPS Energy REC Sales	2 years	Contract	6/4/2019	Advice Letter Filing 5554-E
Eagle Solar (33R415RM)	6/12/2019	ReMAT	N/A	Consent to Assignment - General Consent	N/A	2019 ERRA Compliance Filing
Eagle Solar (33R415RM)	6/13/2019	ReMAT	N/A	Consent to Assignment- Financing	N/A	2019 ERRA Compliance Filing
Cedar Flat (33R334RM)	6/19/2019	ReMAT	N/A	Consent to Assignment – General Consent	N/A	2019 ERRA Compliance Filing

**Confidential Attachment H**

**Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Second Quarter 2019**

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

<b>Contract/ Counterparty Name</b>	<b>Termination or Expiration<sup>3</sup></b>	<b>Date</b>	<b>Product</b>	<b>Volume (MW)</b>
Five Bears Hydroelectric (10H010)	Expiration	4/26/2019	QF	.99
Calpine King City Cogen (18C006)	Expiration	4/27/2019	QF	120
EIF Haypress (Lwr) (15H005)	Expiration	4/30/2019	QF	6.1
EIF Haypress (Mdl) (15H006)	Expiration	4/30/2019	QF	8.7
Thermal Energy Dev. Corp. (16P054)	Termination	5/6/2019	QF	21
Kingston Energy Storage (40S010)	Termination	5/8/2019	Energy Storage	50
Calstor, LLC (40S007)	Termination	5/17/2019	Energy Storage	10
Olcese Water District (25H073)	Expiration	5/17/2019	QF	16
Castelanelli Bros. Biogas (33R061AB)	Expiration	6/16/2019	AB1969/FIT	0.3

<sup>3</sup> A terminated contract is ended before its original expiration date. An expiration date is the natural end of the contract.

Advice 5600-E  
July 30, 2019

## **Attachment 4**

# **Confidentiality Declarations and Matrix**

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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5600-E**

**DECLARATION OF JAY BUKOWSKI  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S  
CONFIDENTIAL ATTACHMENTS F, G 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 Policy and 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, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's July 30, 2019 Advice Letter 5600-E, Confidential Attachments F, G 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 Public Utilities Code Section 454.5(g). The matrix also specifies why



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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5600-E**

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

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 Policy and 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, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E’s July 30, 2019 Advice Letter -5600-E, Confidential Attachments A, B, C, E, H, 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 Public Utilities Code Section 454.5(g). The matrix also specifies why



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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5600-E**

**DECLARATION OF JOHN ULLOA  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND INFORMATION  
CONTAINED IN CONFIDENTIAL ATTACHMENTS A, B, D, J AND L**

I, John Ulloa, declare:

1. I am presently employed by Pacific Gas and Electric Company (“PG&E”) and have been an employee since 1998. My current title is Manager, 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, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E’s July 30, 2019 Advice Letter 5600-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-



**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 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
<b>Document: Quarterly Compliance Report</b>			
Attachment A – Physical and Financial Electric Transactions	Item 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
	Item XIII) Energy Division Monthly Data Request (AB 57)	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 A – Physical and Financial Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	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.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	Item 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	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 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
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (Electric and Natural Gas Transactions)	Public Utilities Code Section 454.5(g)	The information contains confidential counterparty information. Release of this commercially market sensitive information could impact market prices because it would release financing terms to other market participants and impact future negotiations. This could cause harm to PG&E's customers, and put PG&E at an unfair business advantage by the disclosure of counterparty information. This information could be used by other market participants to gain a commercial advantage.	3 Years
Attachment C – in its entirety: Electric Transactions	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
	Item XIII) Energy Division Monthly Data Request (AB 57)	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

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 2019**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time Date To Be Kept Confidential</b>
Attachment D – in its entirety: Natural Gas Transactions	<p>Item I) A) 4) Long-term fuel (gas) buying and hedging plans</p> <p>Item I) B) 2) Utility recorded gas procurement and cost information</p> <p>XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)</p>	<p>Each financial transaction is a factor in PG&amp;E's long term buying and hedging strategies. With the entire set of transactions PG&amp;E's counterparties could reconstruct PG&amp;E's gas buying and hedging plans.</p> <p>Actual quantity and cost of procured physical gas are protected.</p> <p>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</p>	<p>Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)</p> <p>Utility recorded physical gas procurement and cost information is confidential for one year.</p> <p>Monthly procurement costs (ERRA Filings) are confidential for 3 years.</p>

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 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
Attachment E – in its entirety: Other Transactions (Electric Information) (Except Greenhouse Gas (“GHG”) Information, which is presented separately below)	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Disclosure of information in these executed contracts could provide market participants regarding PG&E’s net open position.	3 Years
	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E’s customers.	3 Years
	Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids	This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E’s customers.	3 Years

**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 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
Attachment E – in its entirety: Other Transactions- (GHG Information)	D.14-10-033  Public Utilities Code Section 454.5(g)	<p>This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&amp;E’s customers and put PG&amp;E at an unfair business advantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&amp;E participated in California Air Resources Board (“CARB”) auctions and PG&amp;E’s net open position for GHG compliance.</p>	Indefinite
Attachment F – in its entirety: PRG Material	D.06-06-066 and Public Utilities Code Section 454.5(g)	<p>Presentations to the PRG include a variety of confidential commercially market sensitive information, including information about e-solicitation, bilateral contracts, pricing information, strategy discussions, recently issued RFO’s, etc.</p> <p>Release of this commercially market sensitive information could impact market prices, cause harm to PG&amp;E’s customers, and put PG&amp;E at an unfair business advantage by the disclosing this information. This information could be used by other market participants to gain a commercial advantage.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Length of Time for Specific Items identified in D.06-06-066 Matrix or Indefinite (for GHG information)
Attachment F – in its entirety: PRG Material- GHG Information	D.14-10-033	<p>Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 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
Attachment G - Independent Evaluator (IE) Report	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
	VIII ) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	Bid information
	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	
Attachment H - Executed Contracts	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.	3 Years
	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 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
	utilities and non-affiliated third parties;  Item VIII ) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids	This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years
Attachment J – System Conditions	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)  Item XIII) Energy Division Monthly Data Request (AB 57)  Public Utilities Code Section 454.5(g)	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.  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.  In addition, this attachment contains market sensitive information and addresses PG&E's energy procurement trading strategies.	3 Years  3 Years  Indefinite
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)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 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
Attachment K – Risk Management	Item XII – Monthly Portfolio Risk Assessment of Appendix 1 of D.06-06-066 for three years.	Value at Risk (VaR) or electric and gas for electric generation is deemed confidential the matrix. Public disclosure of TeVaR results would be detrimental for PG&E and its electric customers. Such disclosure would release confidential, sensitive market intelligence that would place PG&E at an unfair disadvantage in the energy and financial markets.	3 years
	Public Utilities Code 454.5(g)	Risk and Strategy papers are proprietary company information that if publicly could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage.	Indefinite
Attachment L – In its entirety: Reasonable Number of Analyses	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)
	Public Utilities Code 454.5(g)	Information concerning a description of PG&E's long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E's customers and put PG&E at an unfair business advantage if publicly disclosed.	Indefinite
Attachment L - Reasonable Number of Analyses – Electric	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	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
	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5600-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2019  
 July 30, 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
	<p>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>This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&amp;E's customers.</p>	<p>3 years</p>
Attachment L - Reasonable Number of Analyses – Electric (continued)	<p>Item XIII) Energy Division Monthly Data Request (AB 57)</p> <p>Item XI) Monthly Procurement Costs (Energy Resource Recover Accounts [ERRA] Filings)</p> <p>D-14-10-033</p>	<p>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.</p> <p>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</p> <p>This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations</p>	<p>3 Years</p> <p>Monthly procurement costs (ERRA Filings) are confidential for 3 years</p> <p>Indefinite</p>

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