

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 18, 2019

Advice Letter 5604-E

Mr. Erik Jacobson
Director of Regulatory Operations
Pacific Gas and Electric Company
77 Beale Street
San Francisco, California 94177

**Subject: Disposition rejecting without prejudice Pacific Gas & Electric Advice Letter 5604-E
Final List of Inactive Rule 20A Communities and Reallocation Details**

Dear Mr. Jacobson:

Pacific Gas and Electric (PG&E) filed Advice Letter (AL) 5604-E which details the final list of communities subject to Rule 20A work credit reallocation pursuant to Ordering Paragraph (OP) 4 of Resolution E-4971. The Energy Division has determined that there were inaccuracies and omissions in AL 5604-E. As such, PG&E's AL 5604-E is rejected without prejudice. PG&E is to notify all the communities considered inactive in the Rule 20A program that they have an additional 90 calendar days to become an active undergrounding community and not be subject to reallocation. PG&E shall refile this Tier 1 AL with the final list of inactive Rule 20A communities promptly within 5 business days of the conclusion of the 90 period. Additional background and discussion are provided in Attachment 1.

Please contact Jonathan Frost of the Energy Division staff at 415-703-5412 (jf6@cpuc.ca.gov) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "ER", followed by the printed name "FOR".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy
Director, Energy Division
California Public Utilities Commission

cc: Annie Ho, PG&E – AMHP@pge.com
Bruce Smith, PG&E – BTS1@pge.com
Erik Jacobson, PG&E – EBJ1@pge.com
Energy Division Tariff Unit – edtariffunit@cpuc.ca.gov
Jonathan Frost, CPUC – jf6@cpuc.ca.gov
Gabe Petlin, CPUC – gpl@cpuc.ca.gov

Attachment 1

Review and Analysis

I. Background:

On April 25, 2019, the Commission issued Resolution E-4971, which directed PG&E to notify communities considered to be inactive in the Rule 20A program (meaning that they have not formed a utility undergrounding district, initiated or completed a Rule 20A project over the past 8 years) that they had 90 days from the date of issuance E-4971 to become active in the Rule 20A program and not be subject to reallocation. Pursuant to OP 6 of Resolution E-4971, PG&E notified 107 of its 266 communities on May 2, 2019 that they were considered inactive and at subject to Rule 20A work credit reallocation. Thirty communities formed undergrounding districts within the 90-day period. On July 31, 2019, PG&E filed its final list of 77 inactive communities and details of the pending \$554,000 reallocation pursuant to OP 4 of Resolution E-4971 in AL 5604-E. PG&E's filing was protested by the County of Tulare and the Cities of Isleton, Newark and Lakeport. All the cities protested over their inactive status and the County of Tulare brought attention to inconsistencies between the inactive communities identified in AL 5604-E and Resolution E-4971.

II. Discussion:

Energy Division rejects without prejudice AL 5604-E because PG&E omitted 10 communities from the final reallocation list and failed to notify them of their inactive status on May 2, 2019. By omitting these communities from the reallocation list, the final reallocation amounts were higher for each of the remaining inactive communities required to fund the \$554,000 than they otherwise would have been with a larger pool of communities to draw Rule 20A funds from. Furthermore, PG&E failed to promptly address the issues with AL 5604-E despite requests from Energy Division Staff. According to CPUC General Order 96-B Section 7.1, the Energy Division has the discretion to reject AL filings without prejudice in the event the utility fails to promptly cure any defects or omissions in the filing.¹

III. Conclusion:

Therefore in light of the above information, PG&E's AL 5604-E is rejected without prejudice. PG&E is to notify all the communities considered inactive in the Rule 20A program that they have an additional 90 calendar days to become an active undergrounding community and not be subject to reallocation. PG&E should refile this Tier 1 AL with the final list of inactive Rule 20A communities promptly within 5 business days of the conclusion of the 90 period.

¹ "Notwithstanding the Industry Division's acceptance of an advice letter for submittal, a defect or omission that becomes apparent during review of the advice letter may require rejection of the advice letter without prejudice if the utility fails, upon request, to promptly cure the defect or omission." (GO 96-B, p.10)

July 31, 2019

Advice 5604-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Final List of Inactive Rule 20A Communities and Reallocation Details

Purpose

Pursuant to Ordering Paragraph (OP) 4 of California Public Utilities Commission (CPUC or Commission) Resolution E-4971 (Resolution), issued on April 25, 2019, Pacific Gas and Electric Company (PG&E) submits this Tier 1 advice letter providing a report on those communities determined to be inactive following the 90-day waiting period required in Ordering Paragraph 3 and proposing the reallocation of a portion of these communities' work credits to the Live Oak Blvd Rule 20A Project in the community of Live Oak. The list of communities and the number of reallocated work credits from each community is shown in Attachment A.

Background

On October 26, 2018, PG&E submitted Advice 5403-E-A, requesting a deviation from Electric Rule 20A to allow the City of Live Oak to borrow Rule 20A work credits beyond the five-year borrow limit for the Live Oak Blvd 20A Project. The Resolution denied PG&E's request for deviation and instead ordered PG&E to reallocate \$554,000 of unused work credits proportionally from communities that have not actively participated in the Rule 20A program, as defined in Ordering Paragraph 5 of the Resolution, to the City of Live Oak.

Inactive Communities, Noticing, and Reallocation

Ordering Paragraph 5 of the Resolution set forth criteria for communities to be considered active and not subject to reallocation. PG&E applied these criteria against the 266 communities participating in PG&E's Rule 20A Program and identified 107 potentially inactive communities.

Pursuant to Ordering Paragraph 6 of the Resolution, PG&E notified all 107 communities within 5 days of the effective date of the Resolution. Notification was sent in hardcopy as well as electronically when e-mail addresses were available. PG&E had follow-up

contacts with the identified communities through the 90-day waiting period with additional e-mail, phone, and in-person meetings.

By the end of the 90-day waiting period, an additional 30 communities took the necessary actions to be considered active and not subject to reallocation, resulting in a final count of 77 inactive communities. Inactive communities and the proposed amount of work credits to be reallocated from each community can be found in Attachment A to this Advice.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 20, 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

PG&E requests that this Tier 1 advice letter submittal become effective upon Commission approval.

PG&E is aware of pending requests for extensions from some communities subject to the 90-day requirement contained in Ordering Paragraph 3. Accordingly, PG&E will make necessary changes to its Rule 20A ledger balances after the Commission approves this advice letter submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically, or via U.S. mail when requested, to parties shown on the attached list and the parties on the service list for R.17-05-010.

PG&E is also providing copies of this advice letter via U.S. mail to the 77 affected communities.

Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.17-05-010



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 U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 5604-E

Tier Designation: 1

Subject of AL: Final List of Inactive Rule 20A Communities and Reallocation Details

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 #: Resolution E-4971

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date:

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:

Advice 5604-E
July 31, 2019

Attachment A

**Rule 20A Program
Work Credits reallocated to City of Live Oak pursuant to
CPUC Resolution E-4971**

**Pacific Gas & Electric Company
 Rule 20A Program
 Work Credits reallocated to City of Live Oak pursuant to CPUC Resolution E-4971**

Community	Amount
County of Alpine	101
City of Amador City	246
County of Amador	17,075
City of Arcata	8,327
City of Arvin	0
City of Atascadero	15,431
Town of Atherton	6,714
City of Avenal	3,932
City of Benicia	11,565
City of Biggs	70
City of Blue Lake	1,764
City of Buellton	862
City of Burlingame	0
City of Calistoga	3,776
City of Carmel-by-the-Sea	4,236
City of Clayton	1,730
City of Cloverdale	4,069
City of Clovis	0
City of Corning	0
Town of Corte Madera	1,277
City of Cotati	2,941
City of Del Rey Oaks	1,829
City of Dixon	0
City of Dos Palos	0
City of El Cerrito	0
City of Emeryville	4,500
City of Escalon	0
Town of Fairfax	0
City of Ferndale	0
City of Fort Bragg	5,997
City of Foster City	266
City of Gilroy	15,126
County of Glenn	16,712
City of Gonzales	2,387
City of Grass Valley	0
City of Greenfield	0
City of Guadalupe	1,950
City of Gustine	1,804
City of Hercules	5,316
City of Hollister	3,222
City of Huron	0
City of Lone	2,551
City of Isleton	0
City of Jackson	1,676
City of King City	264
City of Lakeport	4,728
County of Lassen	2,014
City of Lathrop	1,880
City of Livingston	3,636
Town of Los Altos Hills	0
City of Manteca *	19,963
City of Maricopa	1,543
County of Marin	19,795
County of Mariposa	16,167
City of Marysville	12,430

**Pacific Gas & Electric Company
Rule 20A Program
Work Credits reallocated to City of Live Oak pursuant to CPUC Resolution E-4971**

Community	Amount
City of Mendota	4,169
City of Menlo Park	28,985
City of Millbrae	15,985
City of Monte Sereno	2,440
City of Newark	13,039
City of Oakley	4,763
City of Orland	0
City of Pacific Grove	0
City of Plymouth	1,092
City of Point Arena	0
City of Red Bluff	7,398
City of Rio Dell	0
City of Rio Vista	0
City of Ripon	0
City of Roseville	92
Town of Ross	0
County of Sacramento	5,097
County of San Benito	0
City of San Bruno	29,272
City of San Joaquin	1,785
City of San Juan Bautista	1,797
City of San Rafael	0
City of San Ramon	9,057
City of Sand City	0
City of Saratoga	18,941
City of Sausalito	9,192
City of Scotts Valley	5,744
City of Sebastopol	4,761
City of Selma	8,265
City of Shafter	6,568
County of Shasta	44,892
City of Shasta Lake	39
County of Sierra	0
County of Siskiyou	187
County of Solano	19,159
City of Soledad	3,720
City of Sonoma	4,243
City of Suisun City	5,323
City of Sutter Creek	2,942
City of Taft	5,936
City of Tehama	0
County of Trinity	2,082
County of Tulare	32,856
City of Vallejo	0
City of Wasco	8,588
City of Wheatland	1,851
City of Williams	2,455
City of Willits	0
City of Willows	3,892
Town of Windsor	3,117
Town of Woodside	4,401
Town of Yountville	0
Total Reallocated	553,997

* reallocation pending CPUC decision

**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		