

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



December 5, 2019

**Advice Letter 5607-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: Approval of Amendments to Decrease Price to Three Photovoltaic Program Contracts and Two Energy Storage Contracts**

Dear Mr. Jacobson:

Advice Letter 5607-E is effective as of November 7, 2019 per Resolution E-5027 Ordering Paragraph.

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

August 1, 2019

**Advice 5607-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Approval of Amendments to Decrease Price to Three Photovoltaic Program Contracts and Two Energy Storage Contracts**

**Purpose**

Pacific Gas and Electric Company (PG&E or Utility) respectfully submits this advice letter seeking California Public Utilities Commission (CPUC or Commission) approval of amendments to five contracts in PG&E's existing energy supply portfolio. Three of the amendments are to power purchase agreements (PPAs) arising out of PG&E's 2016 Photovoltaic (PV) Program Solicitation, each of which is with Recurrent Energy.<sup>1</sup> The other two amendments are to capacity agreements with energy storage providers arising out of PG&E's Local Sub-Area Energy Storage Request for Offers (LSA ES RFO). The first storage agreement is with mNOC AERS, LLC (mNOC). The second storage agreement is with Hummingbird Energy Storage, LLC (Hummingbird). This Advice Letter refers to the five contracts collectively as the "Agreements" and to the five amendments to the Agreements collectively as the "Amendments".

In each of the Amendments, PG&E agrees, subject to bankruptcy court and Commission approval respectively, to assume the Agreements as part of PG&E's ongoing bankruptcy proceeding in exchange for at least a 10% price reduction of the Agreements and other changes.

The Amendments are reasonable and in the interest of customers, and thus should be approved. PG&E respectfully requests that the Commission issue a Final Resolution on this Advice Letter by no later than October 30, 2019, which is 90 days from the submittal date of this advice letter, in order to provide certainty to the parties going forward as to

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<sup>1</sup> The Commission requires PG&E to file any "significant modification" of an approved Renewables Portfolio Standard ("RPS") contract, like those resulting from the PV Program, by Advice Letter. See Commission Decision ("D.") 19-02-007, p. 92 ("PG&E must seek the Commission's approval through an advice letter for any significant modification to any procurement contract for RPS-eligible resources that was approved by the Commission.").

whether the Amendments are effective and to allow the development of the projects to continue.

### **Background**

The following table summarizes the Agreements and the Amendments that PG&E is submitting for Commission review and approval.

<b>Project</b>	<b>Original Contractual Online Date</b>	<b>Project Capacity</b>	<b>Summary of Amendment<sup>2</sup></b>
RE Gaskell West 3 LLC PPA	12/1/2020	20 MW	Contract price reduction of 10%; deferral of Guaranteed Commercial Operations Date (GCOD) to 12/1/2022 and adjustment of related development milestones and extension rights; reconfiguration of transformer layout to allow shared facilities; and contract assumption in PG&E's bankruptcy case.
RE Gaskell West 4 LLC PPA	12/1/2020	20 MW	Contract price reduction of 10%; deferral of Guaranteed Commercial Operations Date ("GCOD") to 12/1/2022 and adjustment of related development milestones and extension rights; reconfiguration of transformer layout to allow shared facilities; and contract assumption in PG&E's bankruptcy case.
RE Gaskell West 5 LLC PPA	12/1/2020	20 MW	Contract price reduction of 10%; deferral of Guaranteed Commercial Operations Date ("GCOD") to 12/1/2022 and adjustment of related development milestones and extension rights; reconfiguration of transformer layout to allow shared facilities; and contract assumption in PG&E's bankruptcy case.

<sup>2</sup> A more detailed description of each Amendment is provided in Confidential Attachment A.

Hummingbird Energy Storage, LLC Energy Storage Resource Adequacy Agreement	12/1/2020	75 MW/ 300 MWh	Contract price reduction of 10%; deferral of Expected Initial Delivery Date to 12/1/2021; and contract assumption in PG&E's bankruptcy case.
mNOC AERS, LLC Behind the Retail Meter Capacity Storage Agreement	10/1/2019	10 MW/ 40 MWh	Contract price reduction of 11%; deferral of Expected Initial Delivery Date to 1/1/2021; and contract assumption in PG&E's bankruptcy case.

### **A. Regulatory Background regarding the PV Program PPAs**

In Commission Decision (D.) 14-11-042, the Commission approved PG&E's proposal to procure the remaining capacity in its approved PV Program in three additional solicitations. Specifically, the Commission ordered PG&E to transfer one-half of the remaining PV program capacity to the sixth Renewable Auction Mechanism (RAM) solicitation and further ordered PG&E to procure the remaining one-half of the volumes equally in two additional solicitations to be held in 2016 and 2017.<sup>3</sup> PG&E launched the 2016 PV Solicitation in December 2016, in compliance with D.14-11-042's requirements. Each of the three PV Program PPAs at issue in this Advice Letter arose out of the 2016 PV Solicitation. PG&E requested approval of each of the 2016 PV Solicitation PPAs via Advice Letter 5146-E, submitted on September 28, 2017. That Advice Letter was approved via a disposition letter from the Commission dated November 21, 2017.

### **B. Regulatory Background regarding the Storage Agreements**

PG&E issued its LSA ES RFO in February 2018 in compliance with Commission Resolution E-4909. That Resolution had directed PG&E to procure energy storage and/or preferred resources in certain local sub-areas. PG&E executed both the Energy Storage Resource Adequacy Agreement with Hummingbird and the Behind the Retail Meter Capacity Storage Agreement with mNOC as a result of the LSA ES RFO. PG&E submitted Advice Letter 5322-E on June 29, 2018 seeking approval of these two and two other energy storage agreements resulting from the LSA ES RFO. The Commission issued Resolution E-4949 on October 25, 2018 approving each of the LSA ES RFO contracts.

### **Description and Benefits of the Amendments**

The general purpose of the Amendments is to resolve uncertainty related to PG&E's ongoing bankruptcy proceeding so that the projects addressed in the Agreements may move forward in the development process while realizing additional value for customers through decreases in price. In the Amendments, PG&E agrees to propose to the

<sup>3</sup> D.14-11-042 at pp. 104-105, Ordering Paragraph (OP) 32.

bankruptcy court that these pre-petition contracts be assumed. This assumption, if approved, removes the uncertainty as to the applicability of PG&E's bankruptcy proceeding on the Agreements, which has caused the respective sellers under the Agreements difficulty to obtain the requisite financing to complete the underlying projects. With the Agreements as amended assumed, the sellers under these Agreements would be able to move forward with project development activities, and customers will be able to realize the value of the projects.

In exchange for PG&E's agreement to assume the Agreements as amended, each of the developers has agreed to at least a 10% price reduction to be paid for the respective products under their respective Agreement. This translates directly into lower costs for PG&E's bundled customers. The reduction will also translate into lower non-bypassable charges related to the RPS-eligible PV Program Agreements and to reduced net capacity costs for the energy storage agreements that need to be recovered from all benefitting customers through the Cost Allocation Mechanism (CAM).

PG&E also agreed to make certain other changes to the Agreements as part of the Amendments, most of which relate to the development delays that occurred since PG&E filed for bankruptcy causing uncertainty for the development of the projects. The later online dates for the PV PPAs recognize that these projects may otherwise be unable to meet their original contractual online dates given the uncertainty and associated delays in development created by PG&E's bankruptcy. The later online date for the storage Agreements also recognizes that these projects may be unable to meet their original contractual online dates given the uncertainty and associated delays in development created by PG&E's bankruptcy. Moving these online dates allows these storage projects to be built so that they can help ensure against the need for future Reliability Must-Run contracts in the South Bay – Moss Landing sub-area, consistent with the Resolutions E-4909 and E-4949. Finally, with regard to the PV PPAs, PG&E agreed to revise the metering of the projects to utilize shared facilities, as required by D.15-12-025.

### **Impact of Amendments on Cost Recovery**

The costs incurred by PG&E pursuant to each of the Agreements have been approved for recovery from bundled customers and through applicable non-bypassable charges from departed load customers. This section of the Advice Letter summarizes the cost recovery mechanisms already approved. In the absence of explicit findings or orders in the Commission's Resolution of this Advice Letter to the contrary, PG&E will deem approval of this Advice Letter to authorize the continued recovery of costs incurred under the amended Agreements as authorized by the Commission in the past and as summarized in this section. This is appropriate because the price decreases obtained through the Amendments will benefit all customers, both bundled and departed load.

### **A. Energy Storage Agreement Recovery through the CAM**

In approving the energy storage Agreements at issue in this Advice Letter, the Commission found: “Ongoing and future local reliability concerns warrant CAM treatment of this storage procurement.”<sup>4</sup> On that basis, the Commission approved PG&E’s proposal to recover the net capacity costs of the storage agreements through CAM,<sup>5</sup> which includes allocating the costs to all benefitting load-serving entities on a load-share basis. The amended energy storage Agreements will continue to address local reliability concerns in the South Bay-Moss Landing sub-area and therefore should continue to be recovered through CAM.

### **B. RPS PPA Recovery through Power Charge Indifference Adjustment (PCIA)**

The Commission has consistently ordered that the above-market costs associated with RPS-eligible PPAs be included in the PCIA.<sup>6</sup> The PCIA is a non-bypassable charge allocated to departed load on a vintaged basis in recognition that these customers should share cost responsibility of contracts entered into by an investor-owned utility on their behalf prior to their decision to begin taking service from another retail seller.

As with other RPS-eligible PPAs, the Commission ordered that the costs of the three PV PPAs at issue in this Advice Letter be included in the calculation of the PCIA.<sup>7</sup> The amendments to the RAM PPAs will benefit all customers by reducing costs, including any above-market costs that are allocated through the PCIA. The costs of these amended RAM PPAs should continue to be included in the PCIA for the following reasons: (a) these PV PPAs were executed on behalf of all then-existing bundled customers; (b) the Commission already has approved the inclusion of the costs in the PCIA; and (c) the Amendments submitted in this Advice Letter reduce the costs that will be paid for these Agreements by all customers.

### **Request for Commission Approval**

PG&E requests that the Commission issue a Final Resolution no later than October 30, 2019, which is 90 days from the submittal date of this advice letter, that:

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<sup>4</sup> Resolution E-4949, p. 42 (Finding 16).

<sup>5</sup> See *id.*, pp. 3, 43 (Order 5).

<sup>6</sup> See, e.g., D.04-12-048, pp. 229-230 (Conclusion of Law 16) (concluding that “[s]tranded costs arising from RPS procurement activities should be collected from all customers, including departing load, over the life of the contract.”).

<sup>7</sup> D.10-04-052, p. 69 (concluding that PG&E “should be allowed to recover any stranded costs associated with its Solar PV program pursuant to D.08-09-012 and D.04-12-048 [the decisions creating the current PCIA]”); Advice Letter 5514-E, submitted Sept. 28, 2017, pp. 9-10 (noting that the approval of the 2016 PV RFO Advice Letter would be deemed to constitute a finding that PG&E may recover any stranded costs consistent with D.08-09-012).

1. Approves each of the Amendments in its entirety, including payments to be made by PG&E pursuant to each of the Agreements as amended by the Amendments, subject to the approval of the federal bankruptcy court and the Commission's review of PG&E's administration of the Amendments.
2. Finds that all procurement and administrative costs, as provided by Public Utilities Code section 399.13(g), associated with the Agreements as amended by the Amendments shall be recovered in rates.
3. Adopts the following finding of fact and conclusion of law in support of CPUC Approval:
  - a. The terms of each of the Amendments are reasonable.
4. Adopts the following findings of fact and conclusions of law in support of cost recovery for the energy storage Agreements as amended by the Amendments:
  - a. The Utility's payments under the amended Hummingbird and mNOC energy storage agreements shall continue to be recovered through the CAM in PG&E's Energy Resource Recovery Account.
5. Adopts the following findings of fact and conclusions of law in support of cost recovery for the PV PPAs as amended by the Amendments:
  - a. The Utility's payments under the amended PV PPAs shall continue to be recovered through PG&E's Energy Resource Recovery Account and included in calculation of the PCIA.

### **Procurement Review Group Participation**

PG&E's Procurement Review Group (PRG) includes representatives from: the Commission's Energy Division and the Public Advocates Office; Coalition of California Utility Employees; Coast Economic Consulting; The Utility Reform Network (TURN), Union of Concerned Scientists, and Woodruff Expert Services (representing TURN). The Amendments were presented to the PRG via email on July 25, 2019.

### **Independent Evaluator**

Because the Amendments were negotiated through bilateral negotiations and were not the result of competitive solicitations, and because the Amendments resulted in price

decreases rather than price increases, PG&E did not engage an Independent Evaluator (IE).<sup>8</sup>

### **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 21, 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

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<sup>8</sup> Cf. Resolution E-4199, p. 69 (Ordering Paragraph (“OP”) 4) (requiring an IE for amendments to RPS-eligible PPAs that are “negotiated through a competitive solicitation and for which the contract price is above the [Market Price Referent (“MPR”)]”; *id.*, pp. 27-28, 69 (OP 5) (requiring an IE’s report when an RPS-eligible PPA is amended to increase the price and when the price is above the MPR and eligible for above-market funds (“AMFs”); D.06-05-039, p. 46 (requiring “each IOU to use an Independent Evaluator to separately evaluate and report on the IOU’s entire [RPS] solicitation, evaluation and selection process for this and all future [RPS] solicitations”); D.13-10-040, pp. 10-11 (requiring an IE when conducting competitive solicitations for new energy storage contracts).

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).

### **Tier Designation and Effective Date**

PG&E designates this Advice Letter as Tier 3 pursuant to General Order 96-B. PG&E requests that this advice letter become effective by no later than October 30, 2019, which is 90 days from the submittal date of this advice letter, and that the Commission issue a Final Resolution by that date approving the Amendments.

### **Limited Access to Confidential Material**

The portions of this Advice Letter marked Confidential Protected Material are submitted under the confidentiality protection of Section 583 and 454.5(g) of the Public Utilities Code. This material is protected from public disclosure because it consists of, among other items, the executed Amendments, which are protected pursuant to D.06-06-066 and D.08-04-023. A separate Declaration Seeking Confidential Treatment regarding the confidential information is submitted concurrently herewith.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for R.18-07-003, R.15-03-011, and R.17-09-020. 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/>.

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/S/

Erik Jacobson  
Director, Regulatory Relations

Attachment A: Detailed Summary of Amended Terms and Conditions and Negotiation Process (Confidential)

Attachment B: Executed Amendment to Gaskell West 3 LLC Power Purchase Agreement between PG&E and Recurrent (Confidential)

- Attachment C: Executed Amendment to Gaskell West 4 LLC Power Purchase Agreement between PG&E and Recurrent (Confidential)
- Attachment D: Executed Amendment to Gaskell West 5 LLC Power Purchase Agreement between PG&E and Recurrent (Confidential)
- Attachment E: Executed Amendment to Behind the Retail Meter Capacity Storage Agreement between PG&E and mNOC (Confidential)
- Attachment F: Executed Amendment to Energy Storage Resource Adequacy Agreement between PG&E and Hummingbird (Confidential)

cc: Cheryl Lee, Energy Division  
Service Lists for R.18-07-003, R.15-03-011, and R.17-09-020



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

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

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5607-E

Tier Designation: 3

Subject of AL: Approval of Amendments to Decrease Price to Three Photovoltaic Program Contracts and Two Energy Storage Contracts

Keywords (choose from CPUC listing): Contracts

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.14-11-042

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

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

Confidential treatment requested?  Yes  No

If yes, specification of confidential information: See attached Confidentiality Declaration and Matrix  
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Dmitri Jarocki, (415)972-5443

Resolution required?  Yes  No

Requested effective date: 10/30/19

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:

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

**PACIFIC GAS AND ELECTRIC COMPANY**

**DECLARATION OF DMITRI JAROCKI  
SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION CONTAINED  
IN ADVICE LETTER 5607-E**

I, Dmitri Jarocki, declare:

1. I am a Manager in the Structured Energy Transactions department within the Energy Policy and Procurement organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include management of renewable energy procurement. 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 procurement information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain procurement data and information contained in the attachments to Advice Letter 5607-E.

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 procurement data and information covered by D.06-06-066. The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on August 1<sup>st</sup>, 2019 at San Francisco, California.

/s/

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Dmitri Jarocki

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

**ADVICE LETTER 5607-E**

**August 1, 2019**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Statute or Order That Data Corresponds To</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time Data To Be Kept Confidential</b>
<b>Document: Advice Letter 5607-E (and Attachments)</b>			
<b>Attachment A</b> (Detailed Summary of Amended Terms and Conditions and Negotiation Process) - in its entirety	VII.G – Renewable Resource Contracts under RPS contracts – without SEPS	This attachment contains a summary of the confidential terms and conditions of the Amendments to RPS-eligible contracts. Disclosure of this information would provide market sensitive information regarding the contract amendments	Three years
<b>Attachment B</b> (Executed Amendment to Gaskell West 3 LLC Power Purchase Agreement between PG&E and Recurrent) - in its entirety	VII.G – Renewable Resource Contracts under RPS contracts – without SEPS	This attachment contains the confidential contract Amendments. Disclosure of this information would provide market sensitive information regarding the RPS-eligible contract amendments.	Three years
<b>Attachment C</b> (Executed Amendment to Gaskell West 4 LLC Power Purchase Agreement between PG&E and Recurrent) - in its entirety	VII.G – Renewable Resource Contracts under RPS contracts – without SEPS	This attachment contains the confidential contract Amendments. Disclosure of this information would provide market sensitive information regarding the RPS-eligible contract amendments.	Three years

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

**ADVICE LETTER 5607-E**

**August 1, 2019**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Statute or Order That Data Corresponds To</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time Data To Be Kept Confidential</b>
<p><b>Attachment D</b> (Executed Amendment to Gaskell West 5 LLC Power Purchase Agreement between PG&amp;E and Recurrent) - in its entirety</p>	<p>VII.G – Renewable Resource Contracts under RPS contracts – without SEPS</p>	<p>This attachment contains the confidential contract Amendments. Disclosure of this information would provide market sensitive information regarding the RPS-eligible contract amendments.</p>	<p>Three years</p>
<p><b>Attachment E</b> (Executed Amendment to Behind the Retail Meter Capacity Storage Agreement between PG&amp;E and mNOC) - in its entirety</p>	<p>VII.G – Renewable Resource Contracts under RPS contracts – without SEPS</p>	<p>This attachment contains the confidential contract Amendments. Disclosure of this information would provide market sensitive information regarding the RPS-eligible contract amendments.</p>	<p>Three years</p>
<p><b>Attachment F</b> (Executed Amendment to Energy Storage Resource Adequacy Agreement between PG&amp;E and Hummingbird) - in its entirety</p>	<p>VII.G – Renewable Resource Contracts under RPS contracts – without SEPS</p>	<p>This attachment contains the confidential contract Amendments. Disclosure of this information would provide market sensitive information regarding the RPS-eligible contract amendments.</p>	<p>Three years</p>

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT A**

**Detailed Summary of Amended Terms and  
Conditions and Negotiation Process**

**(CONFIDENTIAL)**

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT B**

**Executed Amendment to Gaskell West 3 LLC  
Power Purchase Agreement  
between PG&E and Recurrent**

**(CONFIDENTIAL)**

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT C**

**Executed Amendment to Gaskell West 4 LLC  
Power Purchase Agreement  
between PG&E and Recurrent**

**(CONFIDENTIAL)**

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT D**

**Executed Amendment to Gaskell West 5 LLC  
Power Purchase Agreement  
between PG&E and Recurrent**

**(CONFIDENTIAL)**

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT E**

**Executed Amendment to Behind the Retail Meter  
Capacity Storage Agreement  
between PG&E and mNOC**

**(CONFIDENTIAL)**

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT F**

**Executed Amendment to Energy Storage  
Resource Adequacy Agreement  
between PG&E and Hummingbird**

**(CONFIDENTIAL)**

**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		