

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



August 30, 2019

Advice Letter 5608-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: Pacific Gas and Electric Company's Conformed Bundled Procurement Plan - Sales Framework (Appendix S) Update

Dear Mr. Jacobson:

Advice Letter 5608-E is effective as of August 1, 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

August 1, 2019

Advice 5608-E

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company’s Conformed Bundled Procurement Plan – Sales Framework (Appendix S) Update

Purpose

Pacific Gas and Electric Company (“PG&E”) hereby submits this Advice Letter to update a certain process in PG&E’s conformed Bundled Procurement Plan (“Conformed BPP”): Sales Framework (“Appendix S”).

Background

By this Tier 1 Advice Letter submittal, PG&E updates a certain process relating to RA Product and Import Capacity Counting Right in the confidential portion of Appendix S to the Conformed BPP.

Attachment

Confidential Attachment A
Confidential Attachment B
Confidential Attachment C
Attachment D

Summary of Modification to Appendix S
Redline Version, Appendix S
Clean Version, Appendix S
Clean Version, Appendix S (Public Version)

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, 4th Floor
San Francisco, California 94102

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

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 1 advice letter become effective upon date of submittal, which is August 1, 2019.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.16-02-007. 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.16-02-007



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) #: 5608-E

Tier Designation: 1

Subject of AL: Pacific Gas and Electric Company's Conformed Bundled Procurement Plan – Sales Framework (Appendix S) Update

Keywords (choose from CPUC listing): Procurement

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: N/A

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: Robert Gomez, RSGa@pge.com, (415)973-8681

Resolution required? Yes No

Requested effective date: 8/1/19

No. of tariff sheets: 0

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 proposed¹: N/A

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

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

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

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

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF ROBERT GOMEZ SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION CONTAINED IN PG&E'S
PROPOSED UPDATES TO THE BUNDLED PROCUREMENT PLAN
(ADVICE LETTER 5608-E)**

I, Robert Gomez, declare:

1. I am a Manager in the Portfolio Management department in the Energy Policy and Procurement organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include overseeing Commercial Planning activities, including the mid-term load forecast and position management at PG&E. 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 the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in PG&E's Advice Letter 5608-E, request for Updates to the Bundled Procurement Plan, Appendix S submitted on August 1, 2019.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive 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, 2019, at San Francisco, California.

A handwritten signature in black ink, appearing to read 'R. Gomez', written over a horizontal line.

ROBERT GOMEZ

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ADVICE LETTER 5608-E
AUGUST 1, 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 Data To Be Kept Confidential
Confidential Attachment A – Summary of Modification to Appendix S	Pub. Util. Code§454.5(g)	This information includes PG&E’s confidential sales framework. Any discussion of PG&E’s sales strategies is market sensitive, because it will impact market participants’ bidding behavior for market products. Disclosure of this information could cause harm to PG&E’s customers and put PG&E at an unfair business advantage through non-competitive sales results.	Indefinite
Confidential Attachment B, C, and D – Appendix S	Pub. Util. Code§454.5(g)	This information includes PG&E’s confidential sales framework. Any discussion of PG&E’s sales strategies is market sensitive, because it will impact market participants’ bidding behavior for market products. Disclosure of this information could cause harm to PG&E’s customers and put PG&E at an unfair business advantage through non-competitive sales results.	Indefinite

Advice 5608-E
August 1, 2019

Confidential Attachment A

Summary of Modification to Appendix S

Advice 5608-E
August 1, 2019

Confidential Attachment B
Redline Version, Appendix S

Advice 5608-E
August 1, 2019

Confidential Attachment C
Clean Version, Appendix S

Advice 5608-E
August 1, 2019

Attachment D

**Clean Version, Appendix S
(Public Version)**



APPENDIX S
SALES FRAMEWORK

CONFIDENTIAL

Issued by
Steven Malnight
Senior Vice President
Regulatory Affairs

Date Filed _____
Effective _____
Resolution No. _____



A. Introduction/Background

This Appendix describes the standards and criteria for Pacific Gas and Electric Company’s (PG&E’s) management and sales of physical energy-only products, Forward Energy from non-Renewables Portfolio Standard (non-RPS) eligible hydro resources or nuclear resources (Carbon Free Energy), Resource Adequacy (RA) Products, and Import Capacity Counting Rights. Due to customer load departure, PG&E may encounter scenarios in which portfolio products exceed the requirements of the portfolio. In these situations, the Sales Framework guides actions PG&E will take. In addition, any transactions under this Sales Framework Appendix will be filed for approval through the Quarterly Compliance Reports (QCR), as required by the Bundled Procurement Plan (BPP).

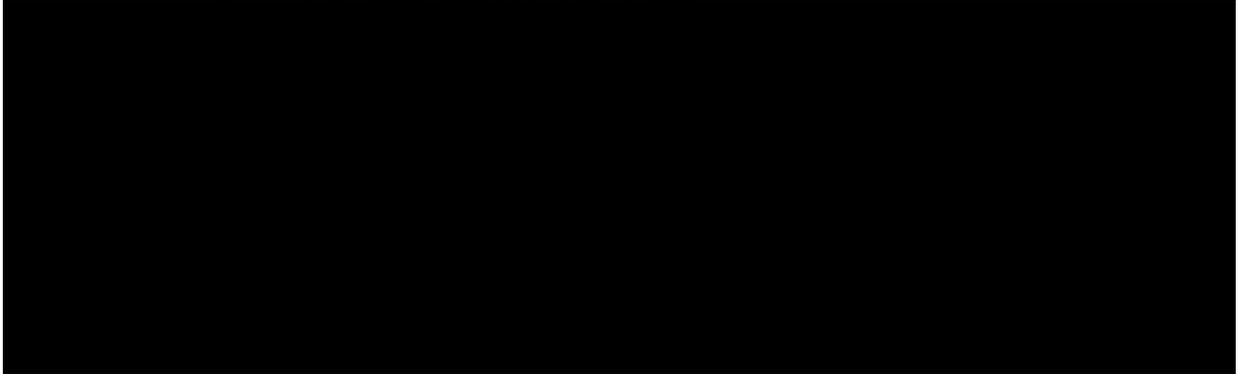
B. Overview of Sales Framework

This section provides a description of the commercial processes and activities that PG&E will pursue to manage any sales of its portfolio of physical energy, carbon free energy, RA Product, and Import Capacity Counting Rights. These processes and activities include: (1) product terms and volumes; (2) commercial processes; and (3) evaluation methodologies. PG&E will offer resource adequacy capacity from resources located in Local Reliability Areas¹ for delivery periods covering all three years in the multiyear framework adopted in Decision (D.) 19-02-022.

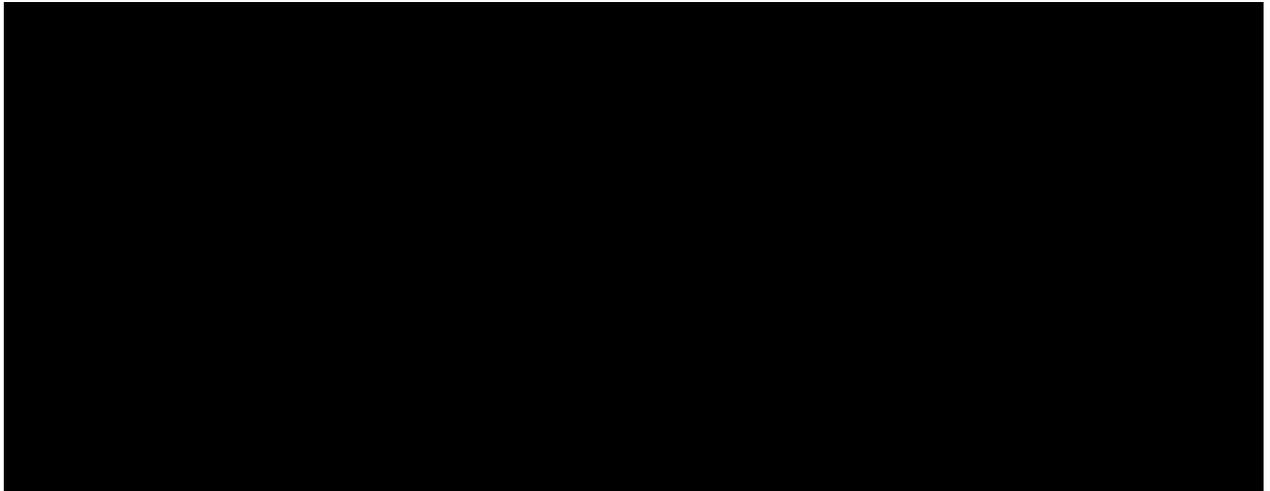
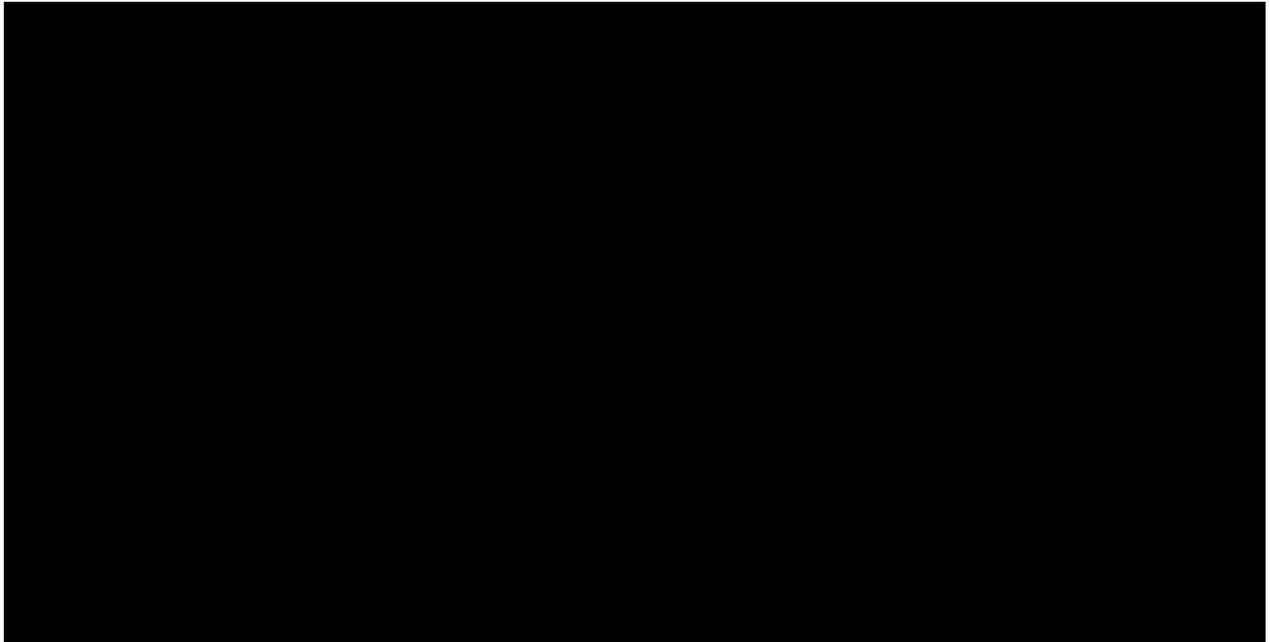
¹ Local Reliability Areas refers to Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.



1. Physical Energy-only Sales



2. Carbon Free Energy



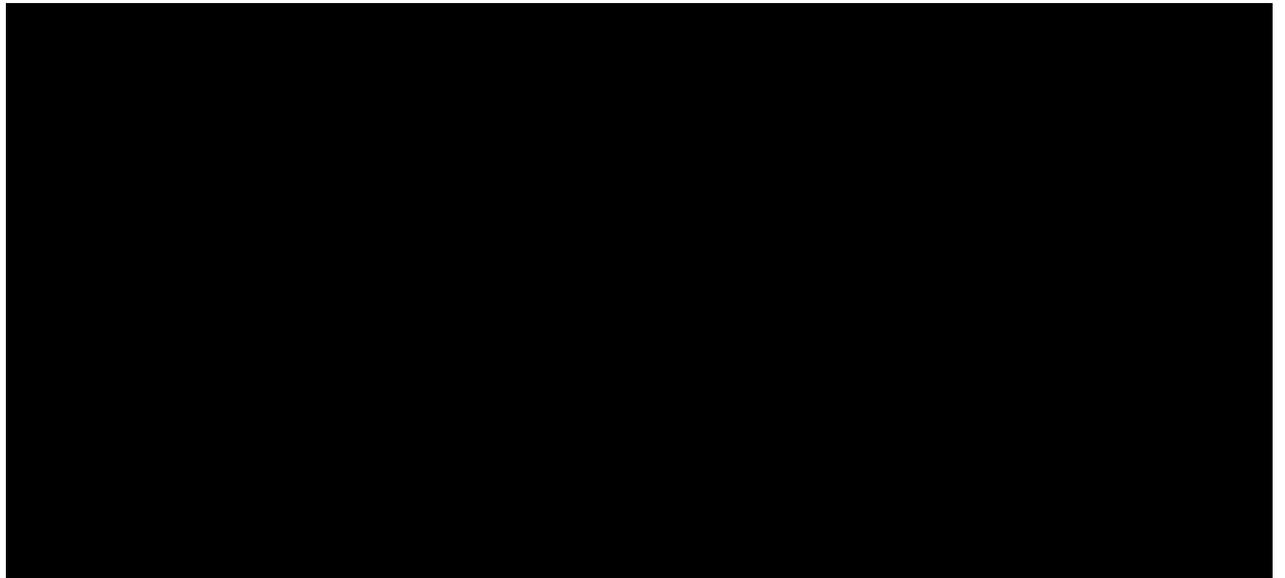
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3. RA Product and Import Capacity Counting Right



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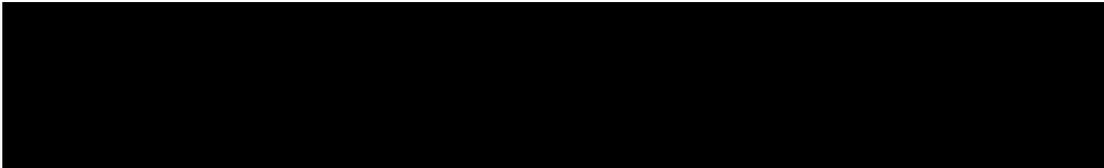
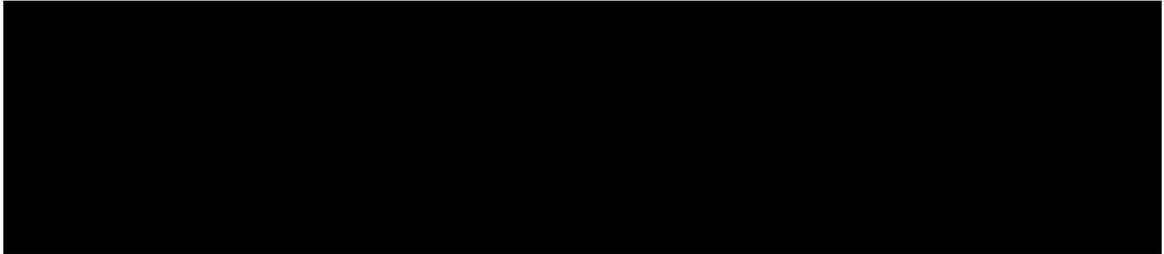
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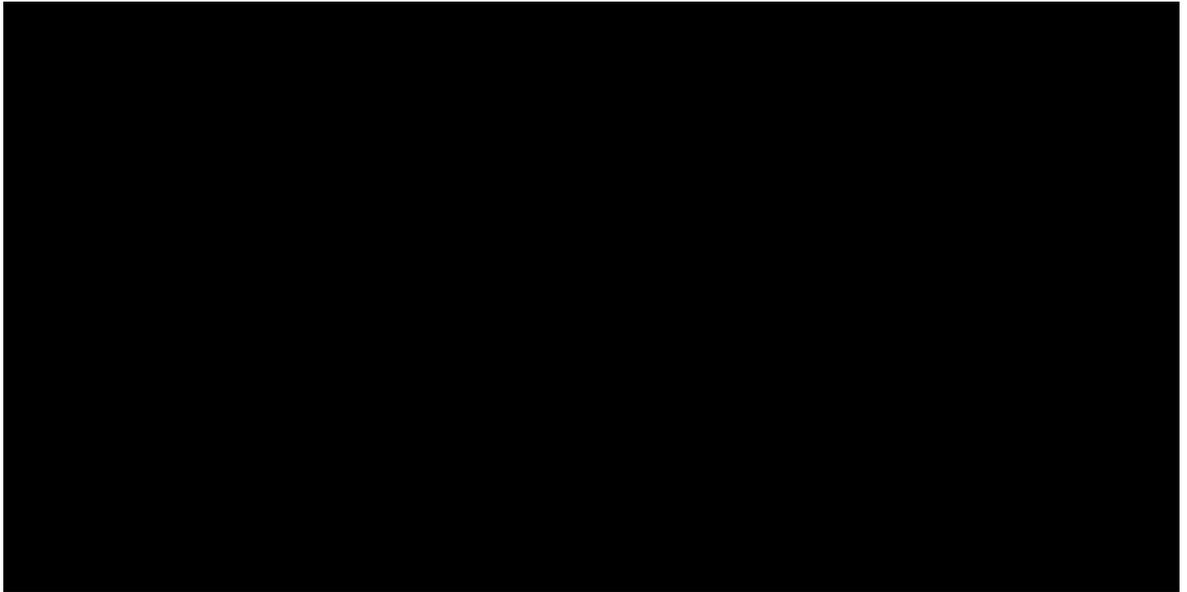
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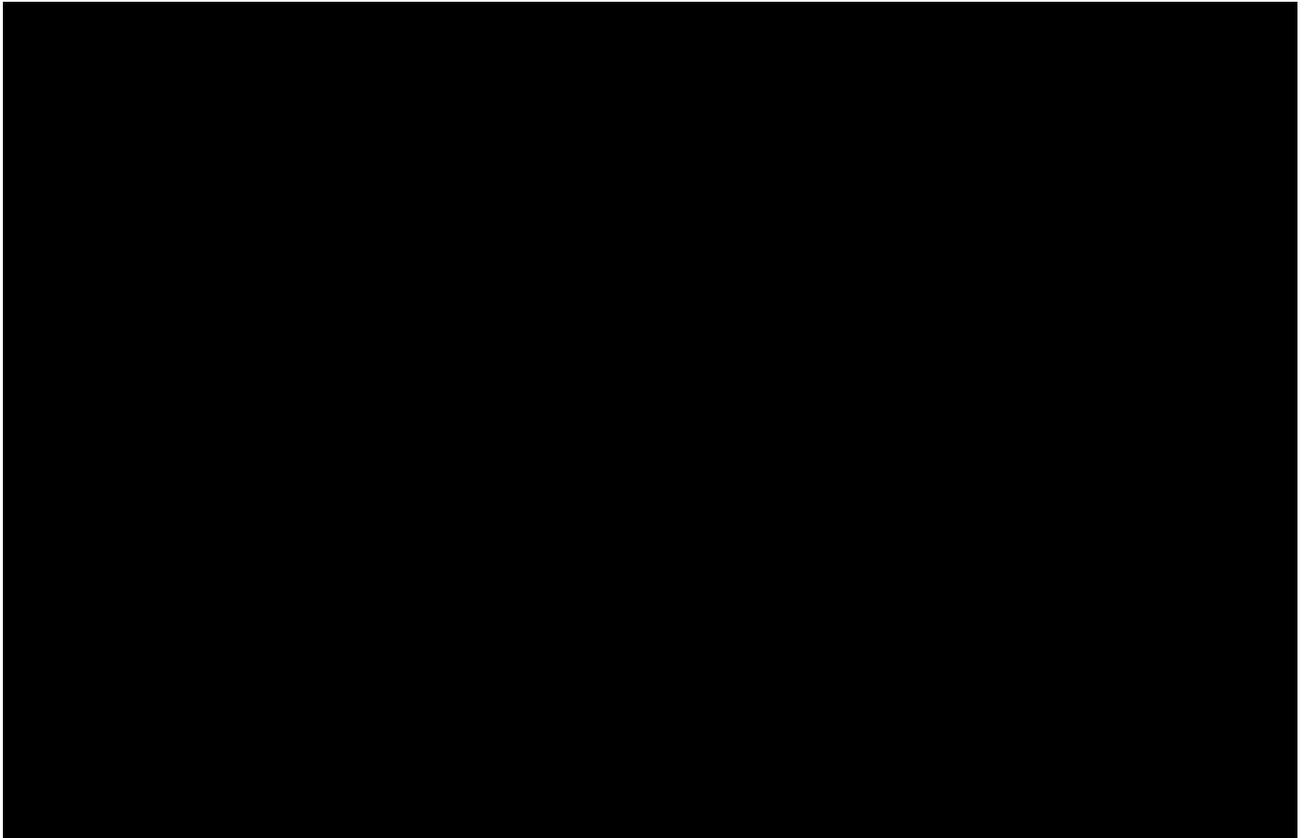
⁴ Local Area refers to the separate Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.



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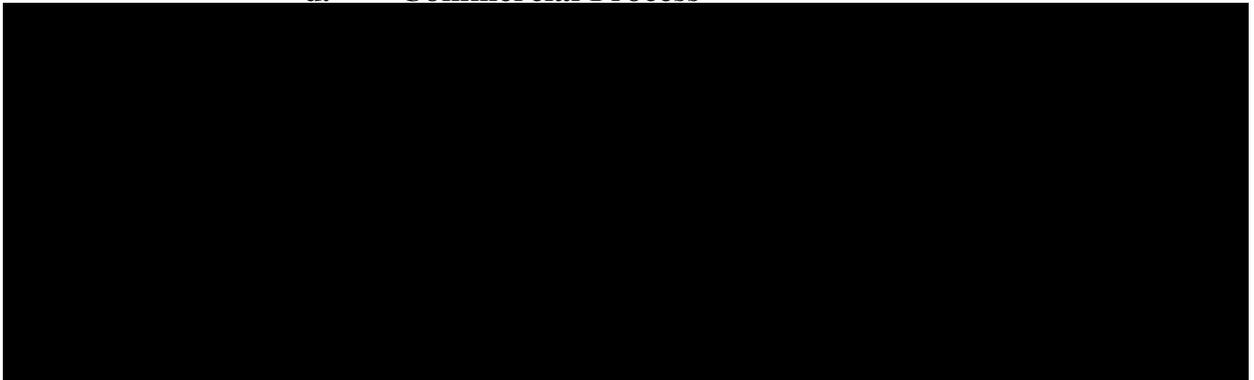
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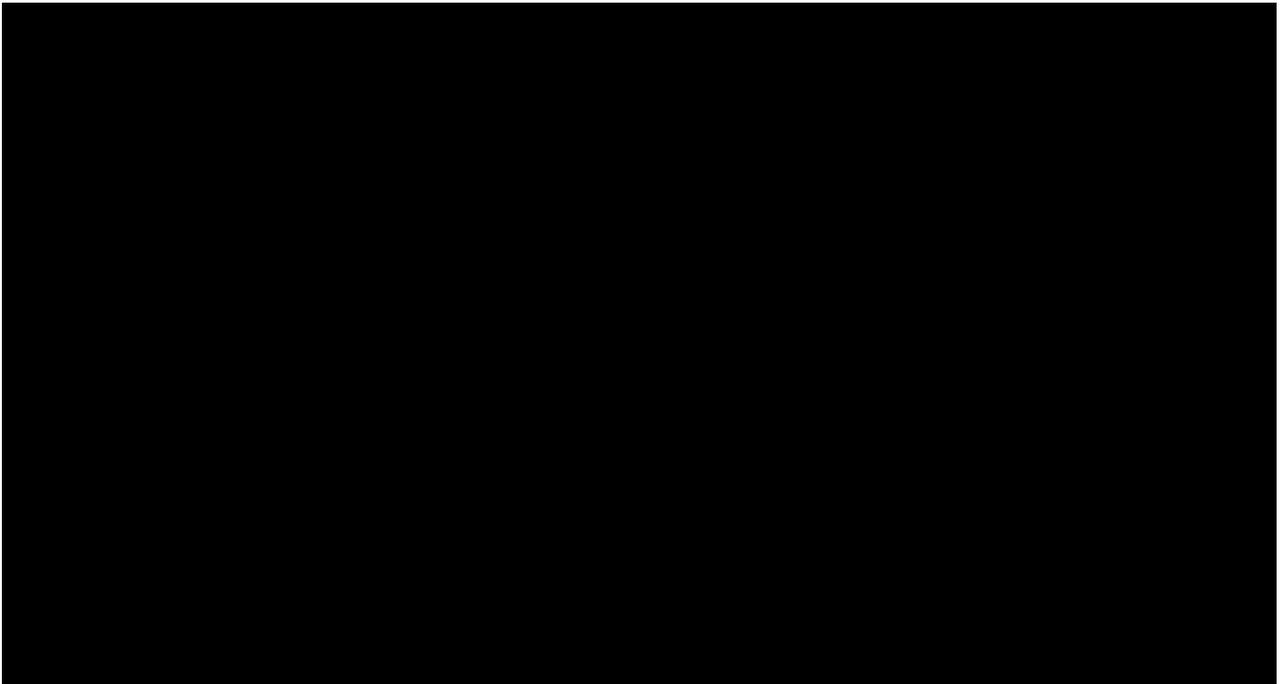


c. Contract Terms

PG&E will only sell RA products using an Edison Energy Institute (EEI) enabling agreement and a PG&E RA confirmation agreement. Sale transactions of RA products will not be facilitated through a Western Systems Power Pool (WSPP) enabling agreement. Additionally, PG&E will not post collateral or performance assurance for any RA product sales.

d. Commercial Process





The table below outlines the schedule in which PG&E solicitations will be issued. Updates to the table will be posted to PG&E’s website and submitted to the CPUC via Tier 1 Advice Letter, at least annually, which will cover delivery periods for the current and upcoming calendar years.

PG&E’s RA SOLICITATION SCHEDULE



Solicitation ⁵	Delivery Term ⁶	Products	Anticipated Date
Q4 through Balance of Year 2019	Monthly, through December 2019	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	July/August 2019
Annual Multiyear (2020 – 2022)	Monthly, January through December (2020 – 2022)	System RA with/without Flex Import Capacity Counting Rights Local RA with/without Flex RA Swaps	Q3 2019 ⁷
February through Balance of Year 2020	Monthly, February through December 2020	System RA with/without Flex Import Capacity Counting Right Local RA with/without Flex RA Swaps	November 2019
Q2 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	January 2020
Q3 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	April 2020
Q4 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	July/August 2020

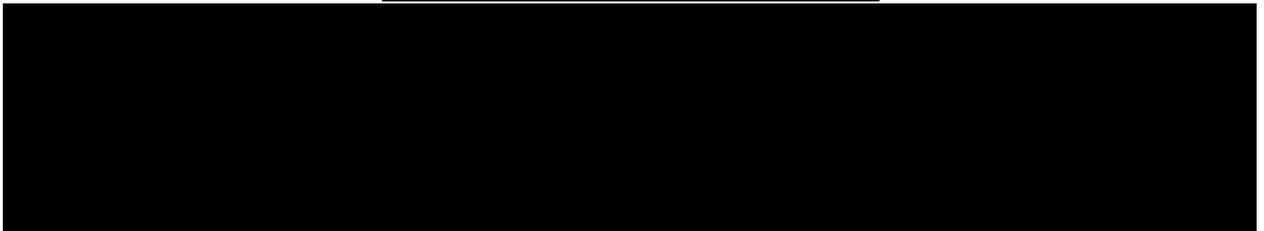
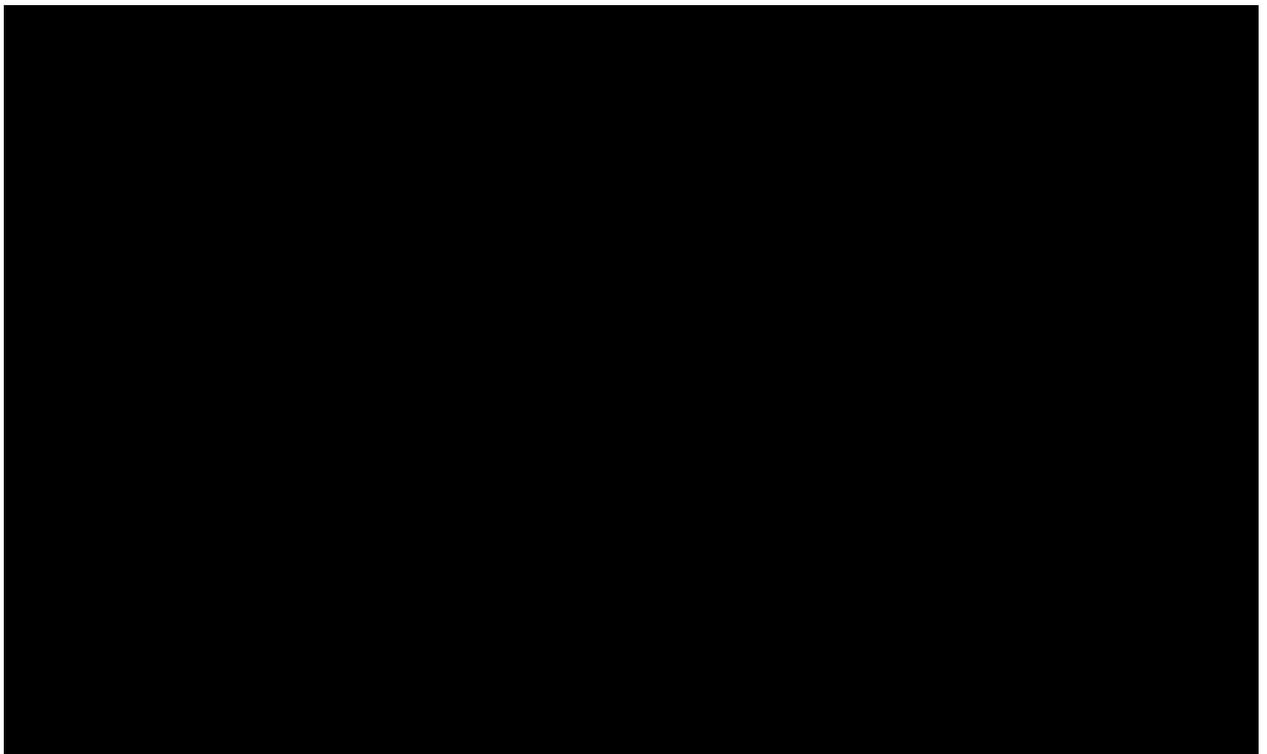
⁵ If PG&E does not have available products to sell, PG&E will not issue a solicitation.

⁶ This table does not guarantee availability of product for the delivery period offered. Quantity is subject to meeting the requirements as described in this Appendix.

⁷ PG&E will issue at least one solicitation to cover the delivery term of three years under the multiyear framework.



Annual Multiyear (2021 – 2023)	Monthly, January through December (2021 – 2023)	System RA with/without Flex Import Capacity Counting Rights Local RA with/without Flex RA Swaps	Q3 2020 ⁸
February through Balance of Year 2021	Monthly, February through December 2021	System RA with/without Flex Import Capacity Counting Right Local RA with/without Flex RA Swaps	November 2020



⁸ PG&E will issue at least one solicitation to cover the delivery term of three years under the multiyear framework.



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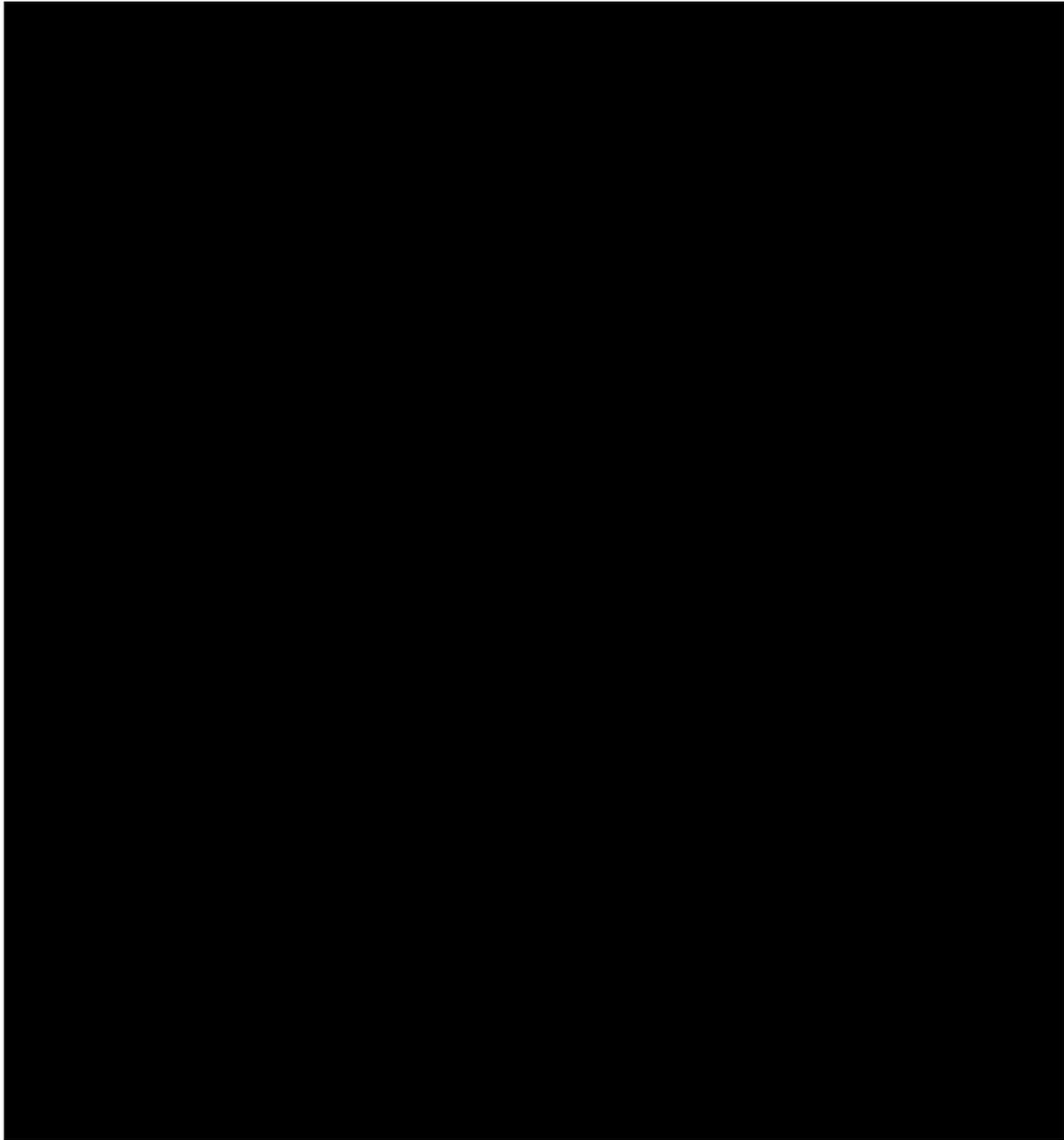
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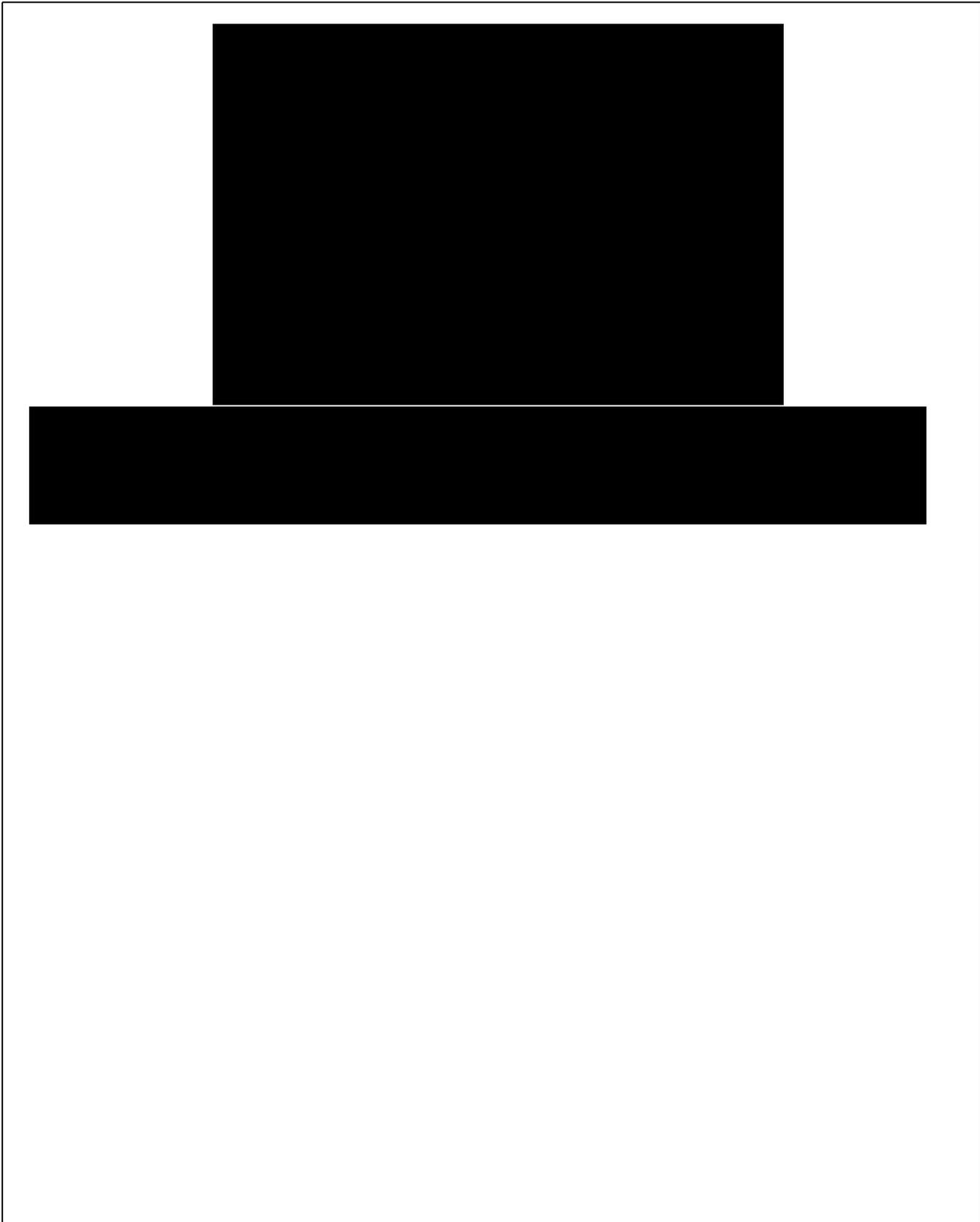
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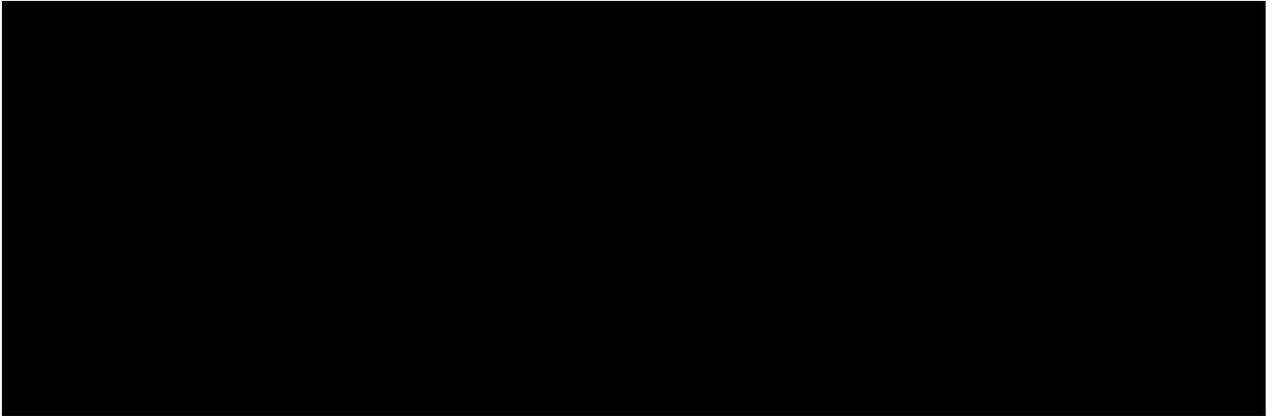
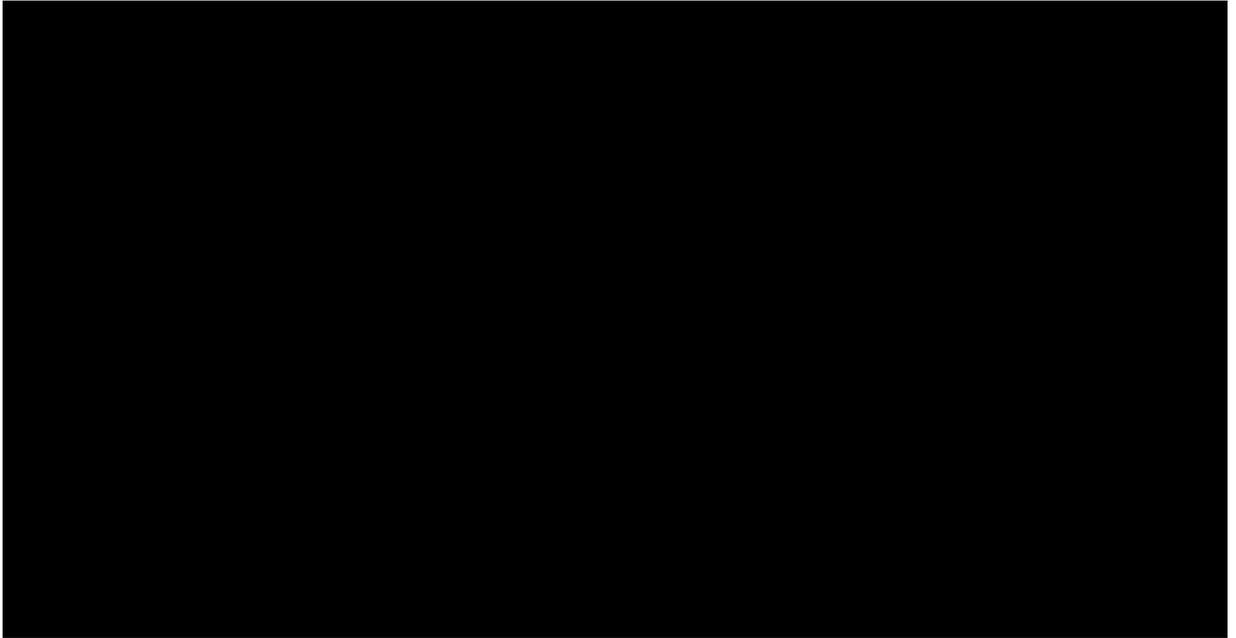


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**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

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		