

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



June 23, 2020

Advice Letter 5670-E, 5670-E-A, 5670-E-B

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 (Q3, 2019).

Dear Mr. Jacobson:

Advice Letter 5670-E, 5670-E-A, 5670-E-B is effective as of November 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

October 30, 2019

Advice 5670-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Procurement Transaction Quarterly Compliance Submittal (Q3, 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 third 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 July 1, 2019 through September 30, 2019, (Q3, 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: Third Quarter 2019 Electric and Natural Gas Transactions
Attachment B: Third Quarter 2019 Counterparty Information
Attachment C: Third Quarter 2019 Electric Transactions Summary

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

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is November 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: 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) #: 5670-E

Tier Designation: 2

Subject of AL: Procurement Transaction Quarterly Compliance Submittal (Q3, 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: 11/29/19

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 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 5670-E
October 30, 2019

Attachment 1

Narrative

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

October 30, 2019

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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 July 1, 2019 through September 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.

PG&E manages its transactions in compliance with its BPP including any updates such as the following Advice Letters submitted in 2019:

- Advice Letter 5469-E, submitted January 16, 2019, approved effective January 16, 2019;
- Advice Letter 5473-E, submitted January 25, 2019, and approved by Resolution (Res.) E-4998 May 30, 2019;
- Advice Letter 5507-E, submitted March 27, 2019, approved effective April 1, 2019;
- Advice Letter 5579-E, submitted July 1, 2019, approved effected July 1, 2019;
- Advice Letter 5589-E, submitted July 17, 2019, approved by Res.E-5026 September 26, 2019;
- Advice Letter 5608-E, submitted August 1, 2019, approved effective August 1, 2019; and
- Advice Letter 5650-E, submitted September 30, 2019, pending CPUC review.

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)¹
- c. Tree Mortality Non-Bypassable Charge (TMNBC) Resource Adequacy (RA) Sale (issued July 19, 2019)
- d. Vantage Firming and Shaping Request for Offers (RFO) (issued August 16, 2018)
- e. 2019 Distribution Investment Deferral Framework RFO (issued February 21, 2019)
- f. Winter Regional Renewable Choice RFO (aka Enhanced Community Renewables (issued November 13, 2018)²
- g. 2018 Oakland Clean Energy Initiative (issued April 13, 2018)

3. Other Procurement Activities (Approval Through the Quarterly Compliance Report)

PG&E also seeks approval of transactions executed from the following procurement activities, other than competitive solicitations, through the Quarterly Compliance Report (QCR).

a) *Electric Transactions*

- i. California Independent System Operator (CAISO) Allocations and Auctions*
 - a. CAISO Monthly Congestion Revenue Rights (CRR) Allocation Processes
 - b. CAISO’s 2020 Annual CRR Tier 1 Allocation and Long-Term Tier 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. Transparent Exchange*

b) *Gas Transactions*

- i. Transparent Exchanges*

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

² The 2018 Winter Regional Renewable Choice RFO was on hold pending Resolution on Advice Letter 3920-G/5206-E. The Resolution was approved on September 26, 2019 and the RFO has resumed.

- 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. Berry Petroleum Company, LLC: Pursuant to Qualifying Facility/Combined Heat and Power (QF/CHP) Settlement,³ PG&E executed a Public Utility Regulatory Policies Act (PURPA) Power Purchase Agreement (PPA) with Berry Petroleum Company, LLC on July 11, 2019. Relevant information is included in the Informational Only section of Attachment H. Advice Letter 5592-E was filed on July 24, 2019.
 - ii. TMNBC RA Sale to East Bay Community Energy Authority: Pursuant to D.18-12-003 and PG&E's RA Sales Framework and Protocols approved on May 23, 2019 in Advice Letter 5478-E, PG&E executed a Master Power Purchase and Sale Agreement – RA Confirmation Letter with East Bay Community Energy Authority on August 30, 2019. Relevant information is included in the Informational Only section of Attachment H. Advice Letter 5635-E was filed on September 13, 2019 and received a disposition letter on October 9, 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.

³ 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; Scott Ranzal, Director, 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 Process
- Direct Bilateral Contracting for Short-Term Products

- Bilateral Negotiated Contracts
- Electronic Solicitations
- 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 August 2019, September 2019, and October 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 July 2019, August 2019, and September 2019, PG&E participated in the CAISO's monthly CRR allocation processes to procure CRRs for August 2019, September 2019, and October 2019, respectively.

- CAISO 2020 Annual CRR Allocation Process

PG&E participated in the 2020 Tier 1 and Long-Term Tier Allocation Processes. Awards from Tier 1 were posted on September 16, 2019, and for the Long-Term Tier on September 30, 2019. Results from these will be available in the next QCR.

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 5473-E, effective May 30, 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 September 30, 2019, 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.

Resource Adequacy (RA) – During the Quarter, PG&E executed transactions to sell Local RA. Relevant information is included in Confidential Attachment E, F, H and M.

- Electronic Solicitations issued by PG&E

Resource Adequacy (RA) – During the Quarter, PG&E executed (1) System RA purchase transactions; (2) System RA sale transactions; (3) Local RA purchase transactions; (4) Local RA sale transactions; (5) Import Allocation Rights sales; and (6) Unit Specific System RA sales. The Multi-Year Local RA Sale Solicitation has been monitored by an Independent Evaluator (IE). The final IE Report will be available upon conclusion of solicitation in fourth quarter 2019. PG&E will supplement this Advice Letter filing with the final IE report. PG&E has included in this Advice Letter a Project Status Memo written by the IE regarding the transactions executed this Quarter. Relevant information is included in Confidential Attachments E, F, G, H and L.

Electric Financial Transactions (in Compliance With D.15-10-031 and Advice Letter 5507-E) – PG&E did not execute any electric financial transactions during the Quarter via E-Solicitation or Transparent Exchange (including voice and on-line brokers). Relevant information is included in Confidential Attachments A and L.

- Transparent Exchange, Voice and On-Line Brokers

Electric Financial Transactions (in Compliance With D.15-10-031 and Advice Letter 5507-E) – PG&E did not execute any electric financial transactions during the Quarter via E-Solicitation or 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., greenhouse gas (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 and On-Line 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 and On-Line 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 August 20, 2019, for Current 2016, 2017, 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 Conformed BPP GHG Procurement Plan filed in Advice Letter 5469-E, effective January 16, 2019, and Advice Letter 5579-E, effective July 1, 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 September 17, 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 RTMs. 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 Third Quarter 2019

PG&E received 249 percent of normal rainfall during the Quarter.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as system conditions and economics allowed. There were no planned outages at Helms during the Quarter lasting longer than 72 hours. There were no maintenance outage events at Helms lasting longer than 72 hours during the Quarter. There were two forced outage events at Helms Unit 1 and Unit 2 lasting longer 24 hours due to leaks in a drain pipe and scroll casing, respectively.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Drum 2 Unit 5 (49.5), Haas Units 1 and 2 (144 MW total), Kings River Unit 1 (52 MW), and Salt Springs Units 1 and 2 (44 MW total). One of the planned outages started in the previous Quarter and no outages will continue into the next Quarter. In addition, there were ten maintenance outages lasting longer than 72 hours which included: Bucks Creek Units 1 and 2 (55 MW total), Butt Valley Powerhouse (41 MW), Pit 1 Unit 1 (30.5 MW), Pit 6 Units 1 and 2 (80 MW total), Salt Springs Units 1 and 2 (44 MW total), and Tiger Creek Units 1 and 2 (58 MW total).

Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW during the Quarter were incurred at the following facilities: Pit 6 Unit 2 (40 MW) and Salt Springs Units 1 and 2 (44 MW total).

At PG&E's fossil combined cycle facilities there were no planned outages and no maintenance outages during the Quarter. There were no forced outages greater than 24 hours.

At PG&E's Humboldt Bay Generating Station (HBGS) there were no planned outages during the Quarter. There were no maintenance outages lasting longer than 72 hours during the Quarter. There was one forced outage event at HBGS lasting longer than 24 hours during the Quarter on Units 4 and 10.

During Third Quarter 2019, Diablo Canyon Power Plant (DCPP) Unit 1 operated as planned with no unexpected, unfavorable generation-impacting events, operating at 101.5 percent capacity factor.

During Third Quarter 2019, DCPP Unit 2 operated as planned with no unexpected, unfavorable generation-impacting events, operating at 89.9 percent capacity factor. As planned, the lower-than-normal capacity factor was due to Unit 2 being off-line for nine days at the end of Third Quarter, starting its 85-day 2R21 refueling outage on September 22.

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 at the California Public Utilities Commission (Cal Advocates) 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 Cal Advocates 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 PURPA CHP PPA that qualifies as a CAM resource under the QF/CHP Settlement. The PURPA CHP PPA with Berry Petroleum, LLC is eligible to have its net capacity costs recovered through CAM because it is a CHP resource executing a Settlement PPA.

Advice 5670-E
October 30, 2019

Attachment 2
Attachment G – Public Version

Public Attachment G

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

Independent Evaluator Reports

IE Report Name	IE Report Workpaper Citation
Independent Evaluator Report: 2019 Multi-Year RA Solicitation Phase I – Project Status Memo	Q3 2019 Public Attachment G - REDACTED 2019 Multi-Year RA Solicitation Phase I - IE Project Status Memo.pdf



Memo

Subject	2019 MULTI YEAR RESOURCE ADEQUACY SOLICITATION
To	Pacific Gas & Electric
From	Charles Janecek
Date	October 4, 2019

PA Consulting Group, Inc. (PA) is serving as the Independent Evaluator (IE) for the Pacific Gas & Electric (PG&E) 2019 Multi Year Resource Adequacy Solicitation (2019 MY RA Solicitation or the Solicitation). This memo report provides a summary of PA's evaluation of Phase I of the Solicitation from the drafting of the Solicitation documents through the recommendation of the selected bids and negotiations of the contracts submitted to the California Public Utilities Commission (CPUC or Commission).

Overview of the Solicitation

The Solicitation has evolved as it has proceeded into a fairly complex solicitation including the originally planned Phase I and Phase II of the Solicitation, as well including "Tranche 2" activities related to Phase I of the Solicitation.

The two Phases of the Solicitation were originally contemplated. The Solicitation protocol for Phase I, launched on July 26, 2019, stated that the Phase I was intended to seek bids after the Initial 2020 Year-Ahead RA Allocations from the CPUC had been received by Load Serving Entities (LSE). Further, the protocol indicated that Phase II would be issued after PG&E received its Final 2020 Year-Ahead Allocations from the CPUC. Ultimately, the Phase II Solicitation was launched prior to LSEs receiving their Final Allocations; however the bid submittal deadline for Phase II occurred after the Allocations were received.

During the course of evaluating Phase I bids, it became apparent that in addition to being generally long on RA on a System basis, PG&E was in fact short on RA for certain months and for certain Local areas, specifically the Kern, North Coast/North Bay, Sierra, and Stockton areas. At this point, PG&E decided to create a "Tranche 2" of the Phase I solicitation and issued a Market Notice requesting parties with potential availability of RA in those Local Areas and who wished to sell RA to contact PG&E. PG&E issued the Market notice on Friday, August 16. The Market Notice did not specify a deadline for "bids" in response to the Notice, but rather indicated that discussions related to potential PG&E Local RA purchases would occur concurrently with the existing Multi-Year RA solicitation.

At this time, PG&E transaction teams were busy conducting negotiations with shortlisted counterparties, which resulted in significant email exchanges and negotiating conference calls. In addition to the Market Notice, PG&E transaction teams also verbally asked counterparties during these negotiating calls if they had any available Local RA in those areas which they may be interested in selling to PG&E.

Further, finding that it was likely to remain short for certain months in certain Local Areas for RA, PG&E issued a Petition for Modification (PFM) on Monday, September 11 related to its Local RA requirements. The PFM requested that the CPUC Decision 19-02-022 be modified to allow PG&E to comply with its Local RA requirements using its existing length in Other Local areas as it did before the Decision. At this time,

PG&E notified all counterparties of its PFM filing and provided them with a courtesy notification and link to the PFM filing. Further, the PG&E team held a conference call forum open to all shortlisted bidders to answer questions about the PFM; after the forum call, PG&E distributed a Questions and Answers (Q and A) document to all shortlisted bidders. The forum and subsequent Q and A document provided clear and consistent messaging regarding the PFM from PG&E to the bidders. At the time of this report, the CPUC has not yet ruled on the PFM.

Phase I and Tranche 2 activities have concluded, with PG&E executing transactions with [REDACTED] counterparties for a total of [REDACTED] MW of Generic RA and [REDACTED] MW of Import Allocations Rights sales by PG&E, and [REDACTED] in Generic RA purchases by PG&E. Phase II of the solicitation was launched on September 18, 2019 with bids due October 3, 2019. PG&E is currently evaluating bids received to the Phase II solicitation.

PA's IE Report

PA's IE reports typically follow the CPUC's Solicitation Shortlist Report Templates. However, because the Solicitation has grown to be complex, with Phase I, Tranche 2, and Phase II activities all being included in the Solicitation, PG&E and PA determined that it would be best to issue a full Independent Evaluator report upon the conclusion of the full Solicitation at the end of Phase II. As such, this Phase I report is a brief Phase I Memo Report, with a full Independent Evaluator report to be issued at the end of Phase II of the Solicitation.

IE Activities During the Solicitation

PA's role in the Solicitation has been one of continuous involvement from mid-July 2019 through the transaction executions in early October 2019. PA performed the role of IE and was beginning with PG&E's development of the Market Notice and Solicitation materials, the participants' webinar pre-bid conference, the bid evaluation and shortlisting, EEI and RA Confirm negotiations, and final execution of Confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in the Solicitation protocol documents and provided fair and equitable treatment of all bids.

The negotiation phase of the Solicitation was complex and intense. As Tranche 2 developed, there were many negotiations involving both swaps and also separate purchases and sales with the same counterparties. As such, there were many dozens of negotiating calls between PG&E transaction teams and the shortlisted counterparties, occasionally involving participants from PG&E's and counterparties' respective Legal and Credit departments to discuss nuances in the RA Confirm documents. PA made every attempt to join and monitor every such call, with myself monitoring the vast majority of them and my colleague Jon Jacobs from PA Consulting also joining and monitoring calls in my stead as necessary. As a result, PA was able to join and monitor approximately 90% of all such calls to ensure fair and equitable treatment across all bids.

A complete description of all IE activities conducted during the Solicitation will be included in the final Independent Evaluator report upon conclusion of the Phase II activities.

Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices via email to PG&E's wholesale RFO distribution list and PG&E's e-Solicitation RA list, in addition to PG&E's Solicitation website. PA is aware that many entities are currently engaged in RA solicitations and understands that most, if not all, market participants with RA obligations were aware of PG&E's Solicitation. In addition, PG&E transaction teams verbally requested that counterparties identify any Local RA they may have for sale to PG&E during Phase I negotiation calls, thereby increasing PG&E's outreach. PG&E understood its RA positions clearly and made significant attempts to cast a wide net to seek counterparties for both sales and purchases of RA during this phase of the Solicitation. PA believes that PG&E extended adequate outreach for Phase I of the 2019 Multi-Year RA Solicitation.

PG&E's Bid Evaluation Methodology

In this Solicitation, the bid evaluations were necessarily complex, as PG&E was evaluating offers for the purchase, sale, and swaps of similar RA volumes from multiple counterparties. PG&E relied upon its internally developed bid optimization model, which sought to optimize value for PG&E ratepayers across all bids. PG&E conducted a bid evaluation protocol conference call with PA and explained the process. While PA did not conduct a detailed evaluation of each bid and its value to PG&E relative to other bids, PA did conduct sample checks of the shortlisting results compared to the original bids and found PG&E's bid evaluation methodology appropriate for this Solicitation.

PG&E's Shortlisting and Negotiations of Confirm

PG&E received over [REDACTED] individual monthly bids in response to the Solicitation, and ultimately shortlisted over [REDACTED] bids by [REDACTED] counterparties.

The Market Notice for this E-Solicitation had specified that PG&E would only contract with bidders under an EEI Master Agreement and provided a standard RA Confirmation Agreement. During the confirm negotiations, PG&E provided draft Confirms to the bidder specific to the bidder's credit terms and that bidders' bid price and RA products. While PG&E hoped to keep modifications to each bidders' Confirm to a minimum, there were a significant number of email and telephone negotiations conducted throughout August and September. As noted above, PA staff joined and monitored the vast majority of these calls, and reviewed each transacted Confirm to ensure equitable treatment across counterparties.

Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2019 Multi-Year Phase I RA Solicitation.

PA's 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 Solicitation was adequate and that the Market Notice materials were clear and concise related to the Solicitation.
- PA finds that PG&E's Bidders Conference webinar was informative and helpful to prospective bidders.
- 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 Phase I of the 2019 Multi-Year Solicitation fairly.

Charles Janecek
Independent Evaluator

Advice 5670-E
October 30, 2019

Attachment 3
Attachment H – Public Version

Confidential Attachment H

**Pacific Gas and Electric Company
 Procurement Transaction Quarterly Compliance Report
 Third 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.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$)	Confirm File Name
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.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Commercial Energy of Montana Inc. (33B202R02)	7/17/2019	System RA (Sale)		1.5 MW			Q3 2019 E- Solicitation
City of San Jose (San Jose Clean Energy) (33B247R05)	7/17/2019	System RA (Sale)		54.55 MW			Q3 2019 E- Solicitation

¹ Rounded to the nearest whole dollar.

Confidential Attachment H

**Pacific Gas and Electric Company
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Commercial Energy of Montana Inc. (33B202R03)	8/15/2019	System RA (Sale)		5 MW 0.60 MW			Q3 2019 E- Solicitation
Clean Power Alliance of Southern California (33B240R04)	9/10/2019	System, Flexible RA (Purchase)		48 MW			Q3 2019 E- Solicitation
Clean Power Alliance of Southern California (33B240R03)	9/10/2019	System RA (Purchase)		200 MW			Q3 2019 E- Solicitation
Monterey Bay Community Power Authority (33B236U01)	9/17/2019	Local RA (Sale)		23 MW 2 MW 8.5 MW 23 MW 2 MW 8.5 MW 23 MW 2 MW 8.5 MW 23 MW 2 MW 8.5 MW			Q3 2019 E- Solicitation
CCSF, acting by and thru its PUC, Power Enterprise (33B250S01)	9/17/2019	Local, Flexible RA (Sale)		73 MW 73 MW 73 MW 73 MW 52.22 MW 73 MW			Q3 2019 E- Solicitation
		Local RA (Sale)		4 MW 2.23 MW 4 MW			

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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Calpine Energy Services, L.P. (33B029U02)	9/17/2019	Local RA (Purchase)	[REDACTED]	3 MW	[REDACTED]	[REDACTED]	Q3 2019 E- Solicitation
		[REDACTED]		3 MW			
		[REDACTED]		3 MW			
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
Calpine Energy Services, L.P. (33B029U01)	9/18/2019	Local, Flexible RA (Purchase)	[REDACTED]	3 MW	[REDACTED]	[REDACTED]	Q3 2019 E- Solicitation
		[REDACTED]		3 MW			
		[REDACTED]		3 MW			
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
Calpine Energy Services, L.P. (33B029U01)	9/18/2019	Local RA (Sale)	[REDACTED]	3 MW	[REDACTED]	[REDACTED]	Q3 2019 E- Solicitation
		[REDACTED]		3 MW			
		[REDACTED]		3 MW			
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
[REDACTED]	3 MW						
Calpine Energy Services, L.P. (33B029U01)	9/18/2019	Local, Flexible RA (Sale)	[REDACTED]	3 MW	[REDACTED]	[REDACTED]	Q3 2019 E- Solicitation
		[REDACTED]		3 MW			
		[REDACTED]		3 MW			
[REDACTED]	3 MW						
[REDACTED]	3 MW						
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**Pacific Gas and Electric Company
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$)'	Confirm File Name
CCSF, acting by and thru its PUC, CleanPowerSF (33B243S01), continued				25 MW 10 MW 4 MW 25 MW 10 MW 4 MW 25 MW 4 MW 25 MW 4 MW			
				4 MW 14 MW 50 MW 19 MW 14 MW 50 MW 19 MW 14 MW 50 MW 19 MW 14 MW 50 MW 14 MW 50 MW			
				15.49 MW 20 MW 50 MW 0.17 MW 25 MW 10 MW 25 MW 10 MW 25 MW 10 MW 25 MW 10 MW 25 MW 10 MW 25 MW 10 MW			

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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
				25 MW 10 MW 25 MW 10 MW 25 MW 10 MW 25 MW 10 MW 25 MW 25 MW			
Sacramento Municipal Utility District (SMUD) (33B248S01)	9/19/2019	Local RA (Sale)		1 MW 1 MW			Q3 2019 E- Solicitation
		Local, Flexible RA (Sale)		2 MW 2 MW			

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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Shell Energy North America (US), L.P. (33B022S01)	9/19/2019	Local, Flexible RA (Sale)					Q3 2019 E- Solicitation
				25 MW			
				25 MW			
				25 MW			
				24.20 MW			
				25 MW			
				25 MW			
				25 MW			
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¹ Rounded to the nearest whole dollar.

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**Pacific Gas and Electric Company
 Procurement Transaction Quarterly Compliance Report
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Shell Energy North America (US), L.P. (33B022S01), continued		Local RA (Sale)		5 MW			
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		5 MW					
		Silicon Valley Clean Energy Authority (33B230S01)		9/19/2019			
0.5 MW							
8 MW							
0.5 MW							
6 MW							
0.5 MW							
0.5 MW							
0.5 MW							
5.20 MW							
1 MW							
15 MW							
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1 MW							

¹ Rounded to the nearest whole dollar.

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 Third Quarter 2019**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Silicon Valley Clean Energy Authority (33B230S01), continued				1 MW			
				1 MW			
				1 MW			
				1 MW			
				13 MW			
				3 MW			
				14 MW			
				13 MW			
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Sonoma Clean Power Authority (33B226S01)	9/19/2019	Local RA (Sale)	[REDACTED]	0.75 MW	[REDACTED]	[REDACTED]	Q3 2019 E- Solicitation
		[REDACTED]		8 MW			
		[REDACTED]		8 MW			
		[REDACTED]		0.90 MW			
		[REDACTED]		8 MW			
		[REDACTED]		0.22 MW			
		[REDACTED]		1 MW			
		[REDACTED]		8 MW			
		[REDACTED]		8 MW			
		[REDACTED]		8 MW			
		[REDACTED]		8 MW			
		[REDACTED]		8 MW			
		[REDACTED]		8 MW			
		[REDACTED]		8 MW			

¹ Rounded to the nearest whole dollar.

Confidential Attachment H

**Pacific Gas and Electric Company
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
City of San Jose (San Jose Clean Energy) (33B247S01)	9/19/2019	Local RA (Sale)		6 MW			Q3 2019 E- Solicitation
				2 MW			
				16.14 MW			
				6 MW			
				12.66 MW			
				6 MW			
				11.58 MW			
				6 MW			
				2 MW			
				6 MW			
				7.75 MW			
				6 MW			
				6 MW			
				6 MW			
				28 MW			
				6 MW			
				28 MW			
				6 MW			
				28 MW			
				6 MW			
				14.84 MW			
				6 MW			
				28 MW			
				6 MW			
				13.38 MW			
				6 MW			
				6 MW			
				6 MW			
		27.88 MW					
		6 MW					
		28 MW					
		3 MW					
		13 MW					
		3 MW					
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		13 MW					
		3 MW					

¹ Rounded to the nearest whole dollar.

Confidential Attachment H

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
				13 MW 3 MW 13 MW 3 MW 13 MW 3 MW 13 MW 3 MW 3 MW			
Peninsula Clean Energy Authority (33B232S01)	9/23/2019	Local, Flexible RA (Sale)		41 MW 43 MW 33 MW 43 MW 42 MW 41 MW 43 MW 33 MW 34 MW 34 MW 21 MW 21 MW 13 MW 16.86 MW 16 MW 21 MW 26 MW 21 MW 31 MW 29 MW 5 MW 11 MW			Q3 2019 E- Solicitation

Confidential Attachment H

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Peninsula Clean Energy Authority (33B232S01), continued				5 MW 5 MW			
		Local RA (Sale)					
				0.83 MW 1 MW 5 MW 5 MW 1 MW 5 MW 1 MW 6 MW 1 MW 5 MW 1 MW 5 MW 1 MW 5 MW 1 MW 5 MW 1 MW 2 MW 2 MW 2 MW 2 MW 2 MW 2 MW 2 MW			
		System RA (Sale)		168 MW 165 MW			

Confidential Attachment H

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
3 Phases Renewables, Inc (33B113S01)	9/23/19	Local, Flexible RA (Sale)	[REDACTED]		[REDACTED]	[REDACTED]	Q3 2019 E- Solicitation
		[REDACTED]		12 MW 6 MW 12 MW 6 MW 12 MW 6 MW 12 MW 6 MW 10 MW 6 MW 10 MW 6 MW 10 MW 6 MW 6 MW 6 MW 10 MW 6 MW 2 MW 10 MW 6 MW 10 MW 6 MW 0.46 MW 10 MW 6 MW 1.23 MW 10 MW 6 MW 10 MW 6 MW 3 MW 1 MW			

¹ Rounded to the nearest whole dollar.

Confidential Attachment H

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
				3 MW 1 MW 3 MW 1 MW 3 MW 1 MW 3 MW 3 MW			
Pioneer Community Energy (33B245S01)	9/24/2019	Local, Flexible RA (Sale)		6.41 MW 8 MW 8 MW 0.92 MW 8 MW 8 MW 8 MW 8 MW 8 MW 8 MW 8 MW			Q3 2019 E- Solicitation
Pioneer Community Energy (33B245S02)	9/24/2019	Local, Flexible RA (Purchase)		6.41 MW 8 MW 8 MW 0.92 MW 8 MW 8 MW 8 MW 8 MW 8 MW 8 MW 8 MW			Q3 2019 E- Solicitation

Confidential Attachment H

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Pilot Power Group, Inc. (33B239T01)	9/24/2019	Local RA (Sale)	[REDACTED]		[REDACTED]	[REDACTED]	Q3 2019 E- Solicitation
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		5 MW			
		[REDACTED]		1 MW			
		[REDACTED]		1 MW			
		[REDACTED]		1 MW			
		[REDACTED]		1 MW			
		[REDACTED]		1 MW			
		East Bay Community Energy Authority (33B238S01)		9/24/2019			
[REDACTED]	33 MW						
[REDACTED]	89 MW						
[REDACTED]	33 MW						
[REDACTED]	89 MW						
[REDACTED]	33 MW						
[REDACTED]	89 MW						
[REDACTED]	20.97 MW						
[REDACTED]	33 MW						
[REDACTED]	89 MW						
[REDACTED]	20.84 MW						
[REDACTED]	45 MW						
[REDACTED]	89 MW						
[REDACTED]	45 MW						
[REDACTED]	89 MW						
[REDACTED]	45 MW						
[REDACTED]	89 MW						
[REDACTED]	45 MW						
[REDACTED]	89 MW						

¹ Rounded to the nearest whole dollar.

Confidential Attachment H

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
East Bay Community Energy Authority (33B238S01), continued				45 MW			
				89 MW			
				45 MW			
				89 MW			
				33 MW			
				45 MW			
				89 MW			
				33 MW			
				45 MW			
				89 MW			
				33 MW			
				43.83 MW			
				33 MW			
				45 MW			
				89 MW			
				33 MW			
				45 MW			
				89 MW			
				33 MW			
				44 MW			
				16 MW			
				44 MW			
				16 MW			
				44 MW			
				16 MW			
				44 MW			
				16 MW			
				44 MW			
				16 MW			
				44 MW			
				16 MW			
				44 MW			
				16 MW			
44 MW							
44 MW							
Local RA (Sale)							
		7 MW					
		7 MW					
		7 MW					
		7 MW					
		7 MW					
		7 MW					
		7 MW					
		7 MW					
		7 MW					
		7 MW					

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
East Bay Community Energy Authority (33B238S01), continued				4 MW 4 MW 4 MW 4 MW 4 MW 4 MW 4 MW 4 MW 4 MW			
East Bay Community Energy Authority (33B238S02)	9/24/2019	Import Allocation Rights (Sale)		71 MW 71 MW 71 MW 71 MW 71 MW 71 MW 71 MW 71 MW 71 MW			Q3 2019 E- Solicitation

Confidential Attachment H

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name
Marin Clean Energy (33B235S01), continued				10 MW 10 MW 10 MW 10 MW 10 MW 10 MW 10 MW			
Marin Clean Energy (33B235S02)	9/24/2019	Local, Flexible RA (Purchase)		16.04 MW 20 MW 20 MW 2.32 MW 20 MW 20 MW 20 MW 20 MW 20 MW 20 MW 20 MW 20 MW 15 MW			Q3 2019 E- Solicitation
		Local RA (Purchase)		5 MW 5 MW 5 MW 5 MW 5 MW 0.52 MW 5 MW 5 MW 5 MW 5 MW 5 MW 5 MW 5 MW 5 MW 10 MW 10 MW 10 MW			

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Volume	Price	Notional Value (\$) ¹	Confirm File Name		
Commercial Energy of Montana Inc. (33B202S01), continued		[REDACTED]	[REDACTED]	1 MW	[REDACTED]	[REDACTED]	[REDACTED]		
				1 MW					
				1 MW					
				1 MW					
				1 MW					
				1 MW					
				1 MW					
				1 MW					
				1 MW					
				1 MW					
				1 MW					
				1 MW					
		System RA (Sale)	[REDACTED]	[REDACTED]	9 MW	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
					8 MW				
					8 Mw				
[REDACTED]	[REDACTED]	[REDACTED]	7 Mw	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		
			9 MW						
			9 MW						
[REDACTED]	[REDACTED]	[REDACTED]	8 MW	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		
			8 MW						

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	Notional Value (\$)	Confirm File Name
Sacramento Municipal Utility District (SMUD) (33B248R02)	7/17/2019	Local RA (Sale)	[REDACTED]	8 MW	[REDACTED]	[REDACTED]	Q3 2019 Bilateral
EDF Trading North America, LLC (33B200R04)	7/18/2019	Local RA (Sale)	[REDACTED]	9 MW	[REDACTED]	[REDACTED]	Q3 2019 Bilateral
Sonoma Clean Power Authority (33B226R04)	8/29/2019	Local RA (Sale)	[REDACTED]	3 MW	[REDACTED]	[REDACTED]	Q3 2019 Bilateral

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Third 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
Berry Petroleum Company, LLC (25C151QPA2)	7/11/2019	PURPA	7 years	Contract	7/24/2019	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
Calpine Russell City Energy Center (33B075)	7/3/2019	Tolling	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
North Star Solar (33R148)	7/8/2019	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
Abel Road Bioenergy (33R479BIO)	7/10/2019	BioMAT	20 years	Contract	N/A	2019 ERRR Compliance Filing
Carriere Family Farms (33R480BIO)	7/10/2019	BioMAT	20 years	Contract	N/A	2019 ERRR Compliance Filing
APEX 646-460 (33R294AB)	7/10/2019	AB1969	N/A	Consent to Assignment - General Consent	N/A	2019 ERRR Compliance Filing
Burney Forest Products (33R404)	7/18/2019	BioRAM	N/A	Amendment to Existing Agreement	4/26/2019	Advice Letter Filing 5533-E (substitute sheets filed 7/18/2019)
Hummingbird Energy Storage, LLC (40S014)	7/26/2019	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Clover Leaf (33R335RM)	7/29/2019	ReMAT	N/A	Consent to Assignment - General Consent	N/A	2019 ERRA Compliance Filing
Hummingbird Energy Storage, LLC (40S014)	7/31/2019	Energy Storage	N/A	Amendment to Existing Agreement	8/1/2019	Advice Letter Filing 5607-E
mNOC AERS LLC (40S012)	7/31/2019	Energy Storage	N/A	Amendment to Existing Agreement	8/1/2019	Advice Letter Filing 5607-E
RE Gaskell West 5 (33R421)	7/31/2019	RPS	N/A	Amendment to Existing Agreement	8/1/2019	Advice Letter Filing 5607-E
RE Gaskell West 4 (33R420)	7/31/2019	RPS	N/A	Amendment to Existing Agreement	8/1/2019	Advice Letter Filing 5607-E
RE Gaskell West 3 (33R419)	7/31/2019	RPS	N/A	Amendment to Existing Agreement	8/1/2019	Advice Letter Filing 5607-E
North Fork Community Power (33R433BIO)	8/12/2019	BioMAT	N/A	Consent to Assignment - Financing	N/A	2019 ERRA Compliance Filing
Commercial Energy of Montana Inc. (33B202R01)	8/22/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRA Compliance Filing
Monterey Bay Community Power Authority (33B236R01)	8/23/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRA Compliance Filing
Peninsula Clean Energy Authority (33B232R01)	8/23/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRA Compliance Filing
Pilot Power Group, Inc. (33B239Q01)	8/26/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRA Compliance Filing
Silicon Valley Clean Energy Authority (SVCEA) (33B230R01)	8/26/2019	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
Third Quarter 2019**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Sonoma Clean Power Authority (33B226R01)	8/26/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
Calpine Energy Services, L.P. (33B029R01)	8/26/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
Direct Energy Business Marketing, LLC (33B233R01)	8/27/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
CleanPowerSF (33B242R01)	8/28/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
Marin Clean Energy (33B235R01)	8/28/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
Exelon Generation Company, LLC (33B007R01)	8/28/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
East Bay Community Energy Authority (33B238R06)	8/30/2019	RA	36 months	Contract	9/13/2019	Advice Letter Filing 5635-E
City of San Jose (San Jose Clean Energy) (33B247R01)	9/5/2019	RA	N/A	Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
CCSF, acting by and thru its PUC, Power Enterprise (33B250)	9/6/2019	EEL Master	N/A	Contract	N/A	2019 ERRR Compliance Filing
Cascade Energy Storage (40S009)	9/17/2019	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing
Sacramento Municipal Utility District (SMUD) (33B248R01)	9/18/2019	RA	N/A	Routine Amendment to Existing Agreement	N/A	2019 ERRR Compliance Filing

Confidential Attachment H

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

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

Contract/ Counterparty Name	Termination or Expiration²	Date	Product	Volume (MW)
Willow Springs 3 (33R444)	Termination	8/20/2019	RPS	75
Berry Petroleum Company – Tannehill (25C151QPA)	Expiration	9/30/2019	PURPA	15.2
Frito Lay Cogen (25C063QPA)	Expiration	9/30/2019	PURPA	2
Aera Energy (South Belridge) (25C049QAA)	Expiration	9/30/2019	As Available	20

² A terminated contract is ended before its original expiration date. An expiration date is the natural end of the contract.

Advice 5670-E
October 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 5670-E**

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

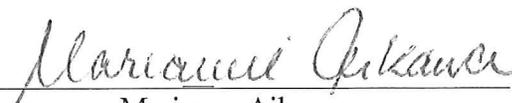
I, Marianne Aikawa, declare:

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 October 30, 2019 Advice Letter -5670-E, Confidential Attachments A, B, C, E, H, J, L and M.
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

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 in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on October 30, 2019, at San Francisco, California.



Marianne Aikawa

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5670-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 October 30, 2019 Advice Letter 5670-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 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 in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on October 30, 2019, at San Francisco, California.



Jay Bukowski

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5670-E**

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

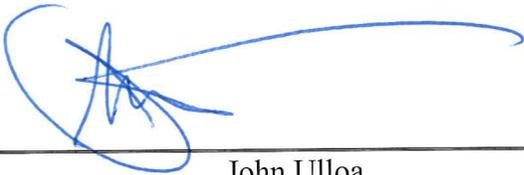
I, John Ulloa, declare:

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 October 30, 2019 Advice Letter 5670-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-

066, 14-10-033 and Public Utilities Code Section 454.5(g). 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 in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on October 30, 2019, at San Francisco, California.



John Ulloa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5670-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2019
 OCTOBER 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
Document: Quarterly Compliance Report			
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 5670-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2019
 OCTOBER 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 5670-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2019
 OCTOBER 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 D – in its entirety: Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans Item I) B) 2) Utility recorded gas procurement and cost information XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	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. Actual quantity and cost of procured physical gas are protected. 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	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) Utility recorded physical gas procurement and cost information is confidential for one year. Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5670-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2019
 OCTOBER 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; Items VIII) A) Bid Information and VIII) 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.	3 Years
Attachment E – in its entirety: Other Transactions- (GHG Information)	D.14-10-033 Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations. Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&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&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5670-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2019
 OCTOBER 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 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&E's customers, and put PG&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
Attachment G - Independent Evaluator (IE) Report	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	3 Years

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 OCTOBER 30, 2019**

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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 J – System Conditions	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	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.	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
	Public Utilities Code Section 454.5(g)	In addition, this attachment contains market sensitive information and addresses PG&E’s energy procurement trading strategies.	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)
Attachment K – Risk Management	Item XII – Monthly Portfolio Risk Assessment of Appendix 1 of D.06-06-066 for three years. Public Utilities Code 454.5(g)	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

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 OCTOBER 30, 2019**

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		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 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
	VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids		

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5670-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER THREE 2019
 OCTOBER 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 L - Reasonable Number of Analyses – Electric (continued)	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
	Item XI) Monthly Procurement Costs (Energy Resource Recover Accounts [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
	D-14-10-033	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations	Indefinite
Attachment M – Executed Contracts	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

**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		