

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



December 6, 2019

**Advice Letter 5674-E**

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**SUBJECT: Green Tariff Shared Renewables Program 2019 Budget**

Dear Mr. Jacobson:

Advice Letter 5674-E 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

October 30, 2019

**Advice 5674-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Green Tariff Shared Renewables Program 2019 Budget**

**Purpose**

Resolution E-5028 was issued on September 30, 2019 approving the extension of, and modifications to, the Investor Owned Utilities' (IOUs') Green Tariff Shared Renewables (GTSR) program. Specifically, the California Public Utilities Commission (CPUC or the Commission) approved some of the proposals made by Pacific Gas and Electric Company (PG&E) in its December 22, 2017 Advice Letter (AL) 3920-G/5206-E. In Ordering Paragraph (OP) 7, the CPUC ordered PG&E and Southern California Edison (SCE) to submit a Tier 2 AL projecting the budget and rates for 2019 or through the year 2023.

This Tier 2 Budget Advice Letter is submitted in compliance with OP 7 of the above-cited Resolution, which orders that "Within 30 days of the effecting date of this resolution, PG&E and SCE shall submit Tier 2 ALs with projected GTSR budgets for 2019 or 5-year budgets through 2023."

**Background**

Decision (D.) 15-01-051 approved the implementation of Senate Bill (SB) 43. SB 43 set a formal requirement for the three large electrical utilities to implement the GTSR Program. The GTSR Program, as implemented by the CPUC, includes both a Green Tariff (GT) and Enhanced Community Renewables (ECR) option. GT allows investor-owned utility customers to purchase energy from a portfolio of solar energy sources under contract with the IOU comprised of a greater share of renewables than is offered in the utility's standard portfolio. ECR allows customers to subscribe to renewable energy from specific newly developed generation projects from which PG&E procures energy.

D.15-01-051 OP 13 required each IOU by no later than December 31, 2017 to submit a Tier 3 Advice Letter or application to make changes to its GTSR program that would either extend it beyond January 1, 2019 (for new customers and/or resources) or terminate it as

of that date. If the IOU desires the extended program to have a different structure or materially different capacity, an application must be filed instead of a Tier 3 Advice Letter.

PG&E submitted Advice Letter 3920-G/5206-E on December 22, 2017 in accordance with OP 13 of D.15-01-051, requesting modifications to, and the extension of, PG&E's GTSR program.

On September 30, 2019 the CPUC issued Resolution E-5028, approving the extension of the GTSR program for all utilities and directing various tariff and program modifications to be made, as well as adopting some reporting requirement consolidation requests made by the IOUs.

### **2019 GTSR Projected Budget**

As of October 30, 2019, PG&E forecasts the following budget for administering its GTSR program in 2019. Costs for the GTSR program are incurred at a relatively steady rate, with the exception of IT which is incurring higher costs through mid-2020 to develop an IT and billing platform for Enhanced Community Renewables. As such, it is reasonable to forecast monthly Q4 costs to be similar to those in Q3.

Program Management	\$ 220,000
Marketing & Outreach	\$ 75,000
Contact Center Operations	\$ 35,000
IT/Billing System	\$ 2,250,000
Energy Procurement	\$ 150,000
<b>Total</b>	<b>\$ 2,730,000</b>

Year to date (YTD) actuals from January 2019 through the end of September 2019 show \$174,756 attributed to program management. This covers the costs of PG&E staff addressing complex customer questions, ensuring ongoing compliance with the most up-to-date Commission guidance, and planning for the future of GTSR.

YTD actuals for marketing and outreach totaled \$46,237 through September. The 2019 total estimate reflects the fact that marketing was less active than usual in the spring of 2019 due to impacts from bankruptcy. The 2019 total estimate of \$75,000 accounts for a return to normal market outreach.

Contact Center Operations have cost the PG&E GTSR program \$26,398 YTD through September. These costs remain relatively stable over time and are not expected to vary significantly through the end of the year.

IT/Billing System costs are the largest in the program. YTD costs through September total \$1,648,377 and the year-end estimate reflects a focus on meeting important IT milestones by the end of the year. The costs originate primarily from the development of an IT platform that will enable the administration of the Enhanced Community Renewables

program and the billing technology that will implement it with PG&E's many different rates and programs.

Energy Procurement costs were \$123,615 YTD through September. They reflect the ongoing management of existing contracts for active PPAs and planning for future procurement needs.

This submittal would 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 submittal 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, 4<sup>th</sup> Floor  
San Francisco, California 94102

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

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

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

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

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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting

factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

**Effective Date**

PG&E requests that this Tier 2 advice submittal become effective on regular notice, November 29, 2019 which is 30 calendar days after the date of submittal.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.12-01-008, et al. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

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/S/

Erik Jacobson  
Director, Regulatory Relations

cc: Service List A.12-01-008, et al.



# 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: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@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) #: 5674-E

Tier Designation: 2

Subject of AL: Green Tariff Shared Renewables Program 2019 Budget

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Res. E-5028

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

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

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

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

Resolution required?  Yes  No

Requested effective date: 11/29/19

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

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

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

<sup>1</sup>Discuss in AL if more space is needed.

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

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

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

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

**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		