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PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



January 10, 2020

**Advice Letter 4181-G/ 5694-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: Establish the General Rate Case Memorandum Account (GRCMA) in  
Compliance with Decision 19-11-004**

Dear Mr. Jacobson:

Advice Letter 4181-G/5694-E is effective as of January 1, 2020.

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

November 21, 2019

**Advice 4181-G/5694-E**

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject:      Establish the General Rate Case Memorandum Account (GRCMA) in  
Compliance with Decision 19-11-004**

**Purpose**

This advice letter complies with Ordering Paragraph (OP) 2 of Decision (D.) 19-11-004 in Pacific Gas and Electric Company's (PG&E) 2020 General Rate Case (GRC).

**Background**

On December 13, 2018, PG&E filed Application (A.) 18-12-009 requesting that the California Public Utilities Commission (Commission or CPUC) authorize its GRC revenue requirement for the period 2020-2022. PG&E's application requests that the test year 2020 revenue requirement go into effect on January 1, 2020.

On February 7, 2019, PG&E filed a motion requesting the Commission issue a decision authorizing PG&E's test-year (TY) 2020 GRC revenue requirement be effective January 1, 2020, in the event that the final decision is issued after this date. On November 7, 2019, the Commission approved D.19-11-004 authorizing PG&E's request for its TY 2020 GRC revenue requirement to be made effective January 1, 2020. Ordering Paragraph 2 directed PG&E to submit a Tier 1 advice letter to "establish a General Rate Case Memorandum Account (GRCMA). In the GRCMA, PG&E shall record the difference in revenue requirement that is effective since the beginning of the test year, January 1, 2020, and the final revenue requirement adopted in this GRC and shall also record interests accrued on the account's balance."

**Tariff Revisions**

In Compliance with D.19-11-004, Ordering Paragraph 2, PG&E proposes to establish the following memorandum account:

- Gas Preliminary Statement Part FE – General Rate Case Memorandum Account – Gas
- Electric Preliminary Statement Part IB – General Rate Case Memorandum Account – Electric

Once a final decision is approved by the Commission in A.18-12-009, these accounts will record the difference between the revenue requirements in effect on January 1, 2020 and the 2020 revenue requirements authorized by the Commission in the 2020 GRC decision. The balances in the GRCMAs will be transferred to the appropriate revenue balancing accounts consistent with the 2020 GRC final decision.<sup>1</sup>

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 11, 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:

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<sup>1</sup> Electric revenue requirements are recovered in the Distribution Revenue Adjustment Mechanism (DRAM) and the Portfolio Allocation Balancing Account (PABA). Gas revenue requirements are recovered in the Core Fixed Cost Account (CFCA) and the Noncore Customer Class Charge Account (NCA).

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

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

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

### **Effective Date**

PG&E requests that this Tier 1 advice submittal become effective on January 1, 2020, consistent with D.19-11-004.

### **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.18-12-009. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

\_\_\_\_\_  
/S/

Erik Jacobson  
Director, Regulatory Relations

### Attachments

cc: Service List A.18-12-009



# 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 U39M)

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) #: 4181-G/5694-E

Tier Designation: 1

Subject of AL: Establish the General Rate Case Memorandum Account (GRCMA) in Compliance with Decision 19-11-004

Keywords (choose from CPUC listing): Compliance, GRC

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-11-004

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: 1/1/20

No. of tariff sheets: 7

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: See Attachment 1

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:

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
35523-G*	GAS PRELIMINARY STATEMENT PART FE GENERAL RATE CASE MEMORANDUM ACCOUNT - GAS (GRCMA) Sheet 1	
35524-G*	GAS TABLE OF CONTENTS Sheet 1	35490-G
35525-G*	GAS TABLE OF CONTENTS Sheet 6	35488-G



**GAS PRELIMINARY STATEMENT PART FE**  
GENERAL RATE CASE MEMORANDUM ACCOUNT - GAS (GRCMA)

Sheet 1

(N)  
(N)

FE. GENERAL RATE CASE MEMORANDUM ACCOUNT – GAS (GRCMA-G)

(N)

1. **PURPOSE:** The purpose of the General Rate Case Memorandum Account (GRCMA) is to record the under or overcollection resulting from the difference between the GRC revenue requirement and corresponding rates in effect on January 1, 2020 and the final GRC revenue requirement for test-year 2020 and corresponding rates adopted by the Commission in a decision for A.18-12-009. The Gas GRCMA is effective January 1, 2020.
2. **APPLICABILITY:** The GRCMA shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATES:** Disposition of the balances in the account shall be through the Core Fixed Cost Account (CFCA) and the Noncore Customer Class Charge Account (NCA), as authorized by the Commission.
4. **RATES:** The GRCMA does not have a separate rate component.
5. **ACCOUNTING PROCEDURE:** The following entries will be made to the account, upon the issuance of a final decision in A.18-12-009, as applicable:
  - a. A one-time debit entry equal to the annual 2020 GRC gas distribution revenue requirement, adopted in the final decision in A.18-12-009, prorated monthly beginning January 1, 2020 until the final decision in A.18-12-009 is implemented;
  - b. A one-time credit entry equal to the annual gas distribution revenue requirement in effect on January 1, 2020, prorated monthly until the final decision in A.18-12-009 is implemented;
  - c. An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
  - d. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)

(N)

(Continued)

Advice 4181-G  
Decision D.19-11-004

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

November 21, 2019  
January 1, 2020



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Advice 4181-G  
Decision D.19-11-004

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted November 21, 2019  
Effective January 1, 2020  
Resolution



**GAS TABLE OF CONTENTS**

Sheet 6

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Part DR	Hydrostatic Station Testing Memorandum Account (HSTMA) .....	33084-G
Part DS	Work Required by Others Balancing Account (WROBA) .....	33477-G
Part DT	Critical Document Program Memorandum Account (CDPMA).....	32812-G
Part DU	Z-Factor Memorandum Account (ZFMA-G) .....	33478,33479-G
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Part EG	Dairy Biomethane Pilots Balancing Account (DBPBA) .....	34715-G
Part EH	Dairy Biomethane Pilots Memorandum Account (DBPMA) .....	34716-G
Part EC	Emergency Consumer Protections Memorandum Account - Gas (ECPMA-G) .....	35470, 35471,35472-G
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Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
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**ELECTRIC PRELIMINARY STATEMENT PART IB** Sheet 1 (N)  
GENERAL RATE CASE MEMORANDUM ACCOUNT - ELECTRIC (GRCMA-E) (N)

IB. GENERAL RATE CASE MEMORANDUM ACCOUNT – ELECTRIC (GRCMA-E) (N)

1. PURPOSE: The purpose of the General Rate Case Memorandum Account (GRCMA) is to record the under or overcollection resulting from the difference between the GRC revenue requirements and corresponding rates in effect on January 1, 2020 and the final GRC revenue requirements for test-year 2020 and corresponding rates adopted by the Commission in a decision for A.18-12-009. The Electric GRCMA is effective January 1, 2020. (N)

2. APPLICABILITY: The GRCMA shall apply to all customer classes, except for those specifically excluded by the Commission.

3. REVISION DATES: Disposition of the balances in the account shall be as authorized by the Commission.

4. RATES: The GRCMA does not have a separate rate component.

5. ACCOUNTING PROCEDURE: The GRCMA consists of the following two subaccounts:

**ELECTRIC DISTRIBUTION SUBACCOUNT:** The purpose of the Electric Distribution Subaccount is to record the under or overcollection resulting from the difference between the GRC revenue requirement and corresponding rates in effect on January 1, 2020 and the final GRC revenue requirement for test-year 2020 and corresponding rates adopted by the Commission in a decision for A.18-12-009. The Electric GRCMA is effective January 1, 2020. Disposition of this subaccount shall be through the Distribution Revenue Adjustment Mechanism (DRAM).

**GENERATION SUBACCOUNT:** The purpose of the Generation Subaccount is to record the under or overcollection resulting from the difference between the GRC revenue requirement and corresponding rates in effect on January 1, 2020 and the final GRC revenue requirement for test-year 2020 and corresponding rates adopted by the Commission in a decision for A.18-12-009. The Electric GRCMA is effective January 1, 2020. Disposition of this subaccount shall be through the Portfolio Allocation Balancing Account (PABA).

a) Electric Distribution Subaccount

The following entries will be made to the Electric Distribution Subaccount each month upon the issuance of a final decision in A.18-12-009, as applicable:

- 1) A one-time debit entry equal to the annual 2020 GRC electric distribution revenue requirement, adopted in the final decision in A.18-12-009, prorated monthly beginning January 1, 2020 until the final decision in A.18-12-009 is implemented;
- 2) A one-time credit entry equal to the annual electric distribution revenue requirement in effect on January 1, 2020 prorated monthly until the final decision in A.18-12-009 is implemented;
- 3) An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
- 4) An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)

(Continued)



**ELECTRIC PRELIMINARY STATEMENT PART IB** Sheet 2 (N)  
GENERAL RATE CASE MEMORANDUM ACCOUNT - ELECTRIC (GRCMA-E) (N)

5. ACCOUNTING PROCEDURE: The GRCMA consists of the following two subaccounts (Cont'd): (N)

b) Generation Subaccount

The following entries will be made to the Generation Subaccount each month upon the issuance of a final decision in A.18-12-009, as applicable:

- 1) A one-time debit entry equal to the annual 2020 generation revenue requirement, adopted in the final decision in A.18-12-009, prorated monthly beginning January 1, 2020 until the final decision in A.18-12-009 is implemented;
- 2) A one-time credit entry equal to the annual generation revenue requirement in effect on January 1, 2020 prorated monthly until the final decision in A.18-12-009 is implemented;
- 3) An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
- 4) An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)  
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(N)

(Continued)

Advice 5694-E  
Decision D.19-11-004

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted November 21, 2019  
Effective January 1, 2020  
Resolution



**ELECTRIC TABLE OF CONTENTS**

Sheet 1

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Advice 5694-E  
Decision D.19-11-004

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted November 21, 2019  
Effective January 1, 2020  
Resolution



**ELECTRIC TABLE OF CONTENTS**

Sheet 17

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Part GK	SmartMeter™ Opt-Out Program Balancing Account - Electric (SOPBA-E).....	35625,35626,35627-E
Part GL	Hydro Licensing Balancing Account (HLBA).....	40564-E
Part GM	Nuclear Regulatory Commission Rulemaking Balancing Account (NRCRBA).....	40565-E
Part GN	San Francisco Incandescent Streetlight Replacement Account.....	34364-E
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(Continued)

**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	SCE
BART	Green Charge Networks	SDG&E and SoCalGas
	Green Power Institute	
Barkovich & Yap, Inc.	Hanna & Morton	SPURR
P.C. CalCom Solar	ICF	San Francisco Water Power and Sewer
California Cotton Ginners & Growers Assn	International Power Technology	Seattle City Light
California Energy Commission	Intestate Gas Services, Inc.	Sempra Utilities
California Public Utilities Commission	Kelly Group	Southern California Edison Company
California State Association of Counties	Ken Bohn Consulting	Southern California Gas Company
Calpine	Keyes & Fox LLP	Spark Energy
	Leviton Manufacturing Co., Inc. Linde	Sun Light & Power
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	Sunshine Design
Casner, Steve	Los Angeles Dept of Water & Power	Tecogen, Inc.
Cenergy Power	MRW & Associates	TerraVerde Renewable Partners
Center for Biological Diversity	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
	Marin Energy Authority	
Chevron Pipeline and Power	McKenzie & Associates	TransCanada
City of Palo Alto	Modesto Irrigation District	Troutman Sanders LLP
	Morgan Stanley	Utility Cost Management
City of San Jose	NLine Energy, Inc.	Utility Power Solutions
Clean Power Research	NRG Solar	Utility Specialists
Clean Power Research		
Coast Economic Consulting	Office of Ratepayer Advocates	Verizon
Commercial Energy	OnGrid Solar	Water and Energy Consulting Wellhead Electric Company
County of Tehama - Department of Public Works	Pacific Gas and Electric Company	Western Manufactured Housing Communities Association (WMA)
Crossborder Energy	Peninsula Clean Energy	Yep Energy
Crown Road Energy, LLC		
Davis Wright Tremaine LLP		
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		