

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



December 9, 2020

Regarding Advice Letters**PG&E 5703-E****SCE 4120-E****SDG&E 3472-E****Liberty 133-E****PacifiCorp 596-E****and BVES 374-E**

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

Gary Stern
Managing Director, State Regulatory
Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770

Clay Faber
Director, California & Federal Regulatory
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, California 92123

Daniel Marsh
Manager, Rates and Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, California 96150

Pooja Kishore
Regulatory Affairs Manager
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon 97232

Nguyen Quan
Manager, Regulatory Affairs
Bear Valley Electric Service
630 East Foothill Blvd.
San Dimas, CA 91773

**SUBJECT: Reports on Possible Off Ramps Pursuant
to the Guidance Decision on
2019 Wildfire Mitigation Plans**

Dear Erik Jacobson, Gary Stern, Clay Faber, Daniel Marsh, Pooja Kishore, and Nguyen Quan,

This disposition letter rejects without prejudice Advice Letters Pacific Gas & Electric Company 5703-E, Southern California Edison Company 4120-E, San Diego Gas & Electric Company 3472-E, Liberty Utilities 133-E, PacifiCorp 596-E, and Bear Valley Electric Service 374-E. The contents of these advice letters was addressed in Decision (D.) 20-03-004 and so further consideration of these advice letters by staff at this time is moot.

Erik Jacobson, Gary Stern, Clay Faber, Daniel Marsh, Pooja Kishore, and Nguyen Quan

December 8, 2020

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Sincerely,



Caroline Thomas Jacobs
Director Wildfire Safety Division



Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

cc: Service List for R.18-10-007

Nathaniel Skinner, Program Manager for Safety Branch of the Public Advocates Office,
Nathaniel.Skinner@cpuc.ca.gov

Marcel Hawiger, Attorney for The Utility Reform Network, marcel@turn.org

Malinda Dickenson, General Counsel for The Protect Our Communities Foundation,
malinda@protectourcommunities.org

December 2, 2019

Advice 5703-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Tier 3 Advice Letter “Reports of Possible Off Ramps”

Purpose

This Tier 3 Advice Letter is being submitted in compliance with the Guidance Decision on 2019 Wildfire Mitigation Plans Submitted Pursuant to Senate Bill 901, Decision 19-05-036 (Decision), Ordering Paragraph (OP) 1 to describe “any concerns about the effectiveness of any program” in Pacific Gas and Electric Company’s (PG&E”) Wildfire Mitigation Plan (WMP).¹

Background

The Decision provides that within six months of its effective date, the “electrical corporations named as respondents shall file [a] Tier 3 Advice Letter entitled ‘Reports on Possible Off Ramps,’ describing any concerns about the effectiveness of any program of their individual Wildfire Mitigation Plans.”² The “report shall clearly describe the concern, contain a specific proposal for action, including if applicable a recommendation to reduce or end the specific mitigation identified, and include any expert or other authoritative information available on the efficacy of the mitigation.”³

Concerns with Effectiveness of Programs

PG&E has not identified concerns about the effectiveness of the programs identified in its approved 2019 WMP.

¹ Decision, OP 1.

² *Id.*

³ *Id.*

Execution of Mitigations

As identified in the Second Amendment to PG&E's Wildfire Mitigation Plan (filed April 25, 2019) and several subsequent, periodic updates to the CPUC and the service list, several risk factors impacting the execution of wildfire mitigation activities, that were generally identified in PG&E's WMP (namely table 9 at pp. 39-46), have been experienced. As a result, specific modifications to mitigation timelines or targets to address specific external conditions that PG&E encountered in its implementation of its WMP have been identified and communicated.⁴ None of these modifications to program timelines constitute a concern about the effectiveness of the mitigations, but rather a reflection of necessary execution timelines given external factors.

Resolution

PG&E is filing this Tier 3 Advice Letter in compliance with the Decision. However, PG&E does not have concerns with the effectiveness of any programs outlined in its 2019 WMP and has not raised any such concerns in this Tier 3 Advice Letter. Therefore, PG&E would be amenable if the Commission disposes of this Tier 3 Advice Letter accordingly.

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 23, 2019, which is 21⁵ 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:

⁴ Second Amendment, p. 1.

⁵ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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 3 advice submittal become effective upon Commission approval.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.18-10-007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List R.18-10-007



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

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

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: 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) #: 5703-E

Tier Designation: 3

Subject of AL: Tier 3 Advice Letter "Reports of Possible Off Ramps"

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other: Every 6 Months

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-05-036

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:

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

**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
	Marin Energy Authority	Tiger Natural Gas, Inc.
Chevron Pipeline and Power City of Palo Alto	McKenzie & Associates	
	Modesto Irrigation District	TransCanada
City of San Jose	Morgan Stanley	Troutman Sanders LLP
Clean Power Research	NLine Energy, Inc.	Utility Cost Management
Coast Economic Consulting	NRG Solar	Utility Power Solutions
Commercial Energy		Utility Specialists
County of Tehama - Department of Public Works	Office of Ratepayer Advocates	
Crossborder Energy	OnGrid Solar	Verizon
Crown Road Energy, LLC	Pacific Gas and Electric Company	Water and Energy Consulting Wellhead Electric Company
Davis Wright Tremaine LLP	Peninsula Clean Energy	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy		Yep Energy
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		