

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 15, 2020

**Advice Letter 5725-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: Update to Pacific Gas and Electric Company's Bundled Procurement Plan  
Greenhouse Gas Procurement Limits.**

Dear Mr. Jacobson:

Advice Letter 5725-E is effective as of December 20, 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

December 20, 2019

**Advice 5725-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Update to Pacific Gas and Electric Company's Bundled Procurement Plan – Greenhouse Gas Procurement Limits**

**Introduction**

Pacific Gas and Electric Company (PG&E) hereby submits to the California Public Utilities Commission (Commission or CPUC) this advice letter to update greenhouse gas (GHG) procurement limits in PG&E's approved Bundled Procurement Plan (BPP).

**Background**

PG&E's BPP establishes the utilities' procurement authority on behalf of bundled customers, consistent with Public Utilities Code Section 454.5, which obviates the need for an after-the-fact reasonableness review by the Commission as long as the resulting utility procurement decisions are consistent with the approved plan. In Decision (D.) 15-10-031, the Commission adopted the investor-owned utilities' proposed BPPs with modifications and required PG&E to submit a conformed copy of its BPP, which was submitted on December 10, 2015.<sup>1</sup> Since then, PG&E has updated the BPP as needed when market conditions or electric portfolio changes necessitate modifying the BPP.

PG&E's BPP establishes electrical capacity procurement limits and ratable rates that apply to electric capacity transactions with deliveries beyond the prompt calendar year.<sup>2</sup> The BPP indicates that PG&E will file an "annual (or more frequent, if necessary) update to its electrical capacity, electric energy, natural gas, and greenhouse gas procurement limit and ratable rates in Appendix C in a Tier 1 advice letter".<sup>3</sup> During the years in which

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<sup>1</sup> On June 15, 2016, the Commission approved PG&E's Conformed BPP submitted in Advice Letter 4750-E consistent with D.15-10-031 and D.16-01-015.

<sup>2</sup> BPP, Sheet Nos. 65-67.

<sup>3</sup> BPP, Sheet No. 37.

PG&E does not file an updated conformed bundled procurement plan, PG&E will submit changes to the BPP procurement limits and ratable rates via Tier 1 advice letter.

### **Discussion**

In this advice letter, PG&E adjusts the previously approved GHG procurement limits since Advice Letter 5448-E was submitted in December 2018, but is not proposing any additional updates to its approved procurement limits and ratable rates at this time. Confidential Attachments A and B of this advice letter include redlined and clean versions of the revised GHG tables appearing in Section C (“GHG Procurement Limits”) of Appendix C of the BPP.

In accordance with D.07-12-052, all proposed updates to the BPP are to be made via an advice letter and shall include red-lined pages of the BPP as well as clean replacement pages.<sup>4</sup>

### **Confidentiality**

In support of this Advice Letter, PG&E submits Confidential Attachments A, B, and C in the manner directed by D.14-10-033 and D.08-04-023 to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under D.14-10-033 and General Order 66-C and Public Utilities Code Section 454.5(g). A separate Declaration Seeking Confidential Treatment is being submitted concurrently with this Advice Letter.

### **Attachments**

Confidential Attachment A	Proposed Edits to GHG Procurement Limits, BPP Sheets 80, 81, 84 (Redline)
Confidential Attachment B	Proposed Edits to GHG Procurement Limits, BPP Sheets 80, 81, 84 (Clean)
Confidential Attachment C	Confidential Workpapers - GHG Procurement Limits

### **Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than January 9, 2020, which is 20 days after the date of this filing. Protests must be submitted to:

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<sup>4</sup> D.07-12-052 at pp. 184-185.

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 1 advice submittal become effective on December 20, 2019.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.16-02-007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to

PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at:  
<http://www.pge.com/tariffs/>.

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

Erik Jacobson  
Director, Regulatory Relations

Attachments

cc: Service List R.16-02-007



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

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

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: 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) #: 5725-E

Tier Designation: 1

Subject of AL: Update to Pacific Gas and Electric Company's Bundled Procurement Plan – Greenhouse Gas Procurement Limits

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 #: D.15-10-031

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 Confidentiality Declaration and Matrix  
 Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Robert Gomez, (415)973-8681, RSGa@pge.com

Resolution required?  Yes  No

Requested effective date: 12/20/19

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:

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

**DECLARATION OF ROBERT GOMEZ  
SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION  
CONTAINED IN PG&E'S ADVICE LETTER 5725-E**

I, Robert Gomez, declare:

1. I am a Manager in the Portfolio Management group within Energy Policy and Procurement at Pacific Gas and Electric Company (PG&E) and am responsible for leading commercial greenhouse gas policy and strategy. In carrying out these responsibilities, I have acquired knowledge of the California Air Resources Board's Cap-and-Trade Regulation and other programmatic measures to establish a market-based price for GHG emissions in order to manage PG&E's compliance with Cap-and-Trade, which became effective on January 1, 2012. 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 procurement information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, D.14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment for certain procurement data and information contained in Advice Letter 5725-E, which provides an update to PG&E's greenhouse gas ("GHG") Procurement Plan Limits.

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 procurement data and information covered by Public Utilities Code Section 454.5(g), D.14-10-033, and General Order (GO) 66-C, Section 2.2b. The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating

into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on December 20, 2019 at San Francisco, California.



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Robert Gomez

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**  
**ADVICE LETTER 5725-E**  
**DECEMBER 20, 2019**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Statute or Order That Data Corresponds To	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
<b>Document:</b>			
Advice 5725-E, Attachment A	<i>D.14-10-033, Attachment A</i>  <i>Public Utilities Code</i> <i>§454.5(g)</i>  <i>General Order 66-C</i>	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
Advice 5725-E, Attachment B	<i>D.14-10-033, Attachment A</i>  <i>Public Utilities Code</i> <i>§454.5(g)</i>  <i>General Order 66-C</i>	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
Advice 5725-E, Attachment C	<i>D.14-10-033, Attachment A</i>  <i>Public Utilities Code</i> <i>§454.5(g)</i>  <i>General Order 66-C</i>	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**

## **Attachment A**

### **Proposed Edits to GHG Procurement Limits, BPP Sheets 80, 81, 84 (Redline)**

**(CONFIDENTIAL)**

# **PACIFIC GAS AND ELECTRIC COMPANY**

## **Attachment B**

### **Proposed Edits to GHG Procurement Limits, BPP Sheets 80, 81, 84 (Clean)**

**(CONFIDENTIAL)**

# **PACIFIC GAS AND ELECTRIC COMPANY**

## **Attachment C**

### **Confidential Workpapers - GHG Procurement Limits**

**(CONFIDENTIAL)**

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