

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



April 3, 2020

Advice Letter 5780-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: Modification to the General Rate Case Memorandum Account - Electric (GRCMA-E)

Dear Mr. Jacobson:

Advice Letter 5780-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

March 12, 2020

Advice 5780-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Modification to the General Rate Case Memorandum Account -
Electric (GRCMA-E)**

Purpose

Pacific Gas and Electric Company (PG&E) submits this advice letter to the California Public Utilities Commission (Commission or CPUC) to modify the accounting section of the Electric Preliminary Statement Part IB, General Rate Case Memorandum Account – Electric (GRCMA-E). This advice letter does not impact Gas Preliminary Statement Part FE, General Rate Case Memorandum Account – Gas (GRCMA-G).

Background

On November 7, 2019, the Commission approved D.19-11-004 authorizing PG&E's request for its 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." In compliance with D.19-11-004, PG&E submitted Advice 4181-G/5694-E on November 21, 2019 to establish Electric Preliminary Statement Part IB, the electric GRCMA and Gas Preliminary Statement Part FE, the gas GRCMA. On January 10, 2020, the Energy Division Director approved Advice 5694-E, with an effective date of January 1, 2020.

Tariff Revisions

PG&E proposes to modify the description of the Generation Subaccount in Section 5., the Accounting Procedure section, by adding the underlined text to the GRCMA as follows:

GENERATON 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) and the Energy Resource Recovery Account (ERRA), as applicable.

PG&E inadvertently excluded the ERRA from the electric tariff implemented through Advice 4181-G/5694-E. As discussed in Advice 5440-E,¹ PG&E's advice letter that established the Portfolio Allocation Balancing Account, "electric supply administration costs, excluding costs supporting the Core Gas Supply Department, will be allocated between PABA, ERRA, and NSGBA² based on the authorized revenue requirement in each account."³ Electric supply administration costs are included in PG&E's base generation revenue requirement.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than April 1, 2020 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:

¹ Advice 5440-E and Electric Preliminary Statement Part HS, were approved effective January 1, 2019.

² In accordance with footnote 13 of Advice 5440-E, PG&E did not modify the NSGBA preliminary statement in Advice 5440-E. As such, the allocated share of costs attributable to NSG resources will continue to be recorded in ERRA until PG&E files a future advice letter to modify the NSGBA.

³ See pg. 12 of Advice 5440-E.

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 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 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) #: 5780-E

Tier Designation: 2

Subject of AL: Modification to the General Rate Case Memorandum Account - Electric (GRCMA-E)

Keywords (choose from CPUC listing): Compliance, GRC/General Rate Case

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: 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: See Attachment 1

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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
46336-E	ELECTRIC PRELIMINARY STATEMENT PART IB GENERAL RATE CASE MEMORANDUM ACCOUNT - ELECTRIC (GRCMA-E) Sheet 1	45748-E*
46337-E	ELECTRIC TABLE OF CONTENTS Sheet 1	46266-E
46338-E	ELECTRIC TABLE OF CONTENTS Sheet 17	46131-E



ELECTRIC PRELIMINARY STATEMENT PART IB Sheet 1
GENERAL RATE CASE MEMORANDUM ACCOUNT - ELECTRIC (GRCMA-E)

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

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.
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) and Energy Resource Recovery Account (ERRA), as applicable.

(T)
(T)

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.

(Continued)

<i>Advice</i>	5780-E	<i>Issued by</i>	<i>Submitted</i>	March 12, 2020
<i>Decision</i>	D.19-11-004	Robert S. Kenney	<i>Effective</i>	January 1, 2020
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



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Sheet 1

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(Continued)

Advice 5780-E
March 12, 2020

Attachment 2

Redline Tariff



ELECTRIC PRELIMINARY STATEMENT PART IB Sheet 1
GENERAL RATE CASE MEMORANDUM ACCOUNT - ELECTRIC (GRCMA-E)

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GENERATOR 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) and Energy Resource Recovery Account (ERRA), as applicable.

(T)
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- 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;
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(Continued)

<i>Advice</i>	5694-E	<i>Issued by</i>	<i>Submitted</i>	November 21, 2019
<i>Decision</i>	D.19-11-004	Robert S. Kenney	<i>Effective</i>	January 1, 2020
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	

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