

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



April 17, 2020

Advice Letter 5783-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: Revised Rule 20A Reallocation Calculation and Request for 90-Day Extension for Inactive Communities Due to Noticing Error

Dear Mr. Jacobson:

Advice Letter 5783-E is effective as of April 17, 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 18, 2020

Advice 5783-G

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Revised Rule 20A Reallocation Calculation and Request for 90-Day Extension for Inactive Communities Due to Noticing Error

Purpose

The purpose of this Advice is to submit a revised Rule 20A reallocation calculation and request a 90-day extension for inactive communities due to noticing error.

Background

On December 5, 2019 Pacific Gas and Electric Company (PG&E) received the Energy Division's letter dated November 18, 2019 providing notice of the rejection, without prejudice, of Advice Letter 5604-E relating to the Final List of Inactive Rule 20A Communities and Reallocation Details. PG&E was ordered to, "notify all the communities considered inactive in the Rule 20A program that they have an additional 90 calendar days to become an active undergrounding community and not be subject to reallocation." PG&E was further directed to, "refile this Tier 1 Advice Letter with the final list of inactive Rule 20A communities promptly within 5 business days of the conclusion of the 90 [day] period."

During the 90-day period, 16 communities passed ordinances for Rule 20A projects and have become active. The attached table shows the revised reallocation calculation excluding these 16 communities.

In accordance with the instructions in the non-standard disposition letter, PG&E sent notification of inactive status on December 13, 2019 to those communities PG&E identified as not meeting the definition of active communities as defined in Resolution E-4971. Upon the conclusion of the 90-day period, while calculating the reallocation amounts for the final list of inactive community, PG&E discovered that the methodology utilized to determine who is active and inactive was flawed. Additionally, some communities had events take place during the 90-day period which changed their status from active to inactive.

Additional research to confirm active and inactive status produced the following findings:

Out of the original 85 inactive communities:

- Five were omitted from notification due to negative or zero work credit balance.
 - Four of these communities (Angels Camp, Corcoran, Mill Valley, and Trinidad) were not notified because they continue to have a negative or zero work balance in 2020 and are therefore exempt from reallocation.
 - One community (Foster City) now has a positive work credit balance due to 2020 work credit allocations. However, Foster City is unable to become active since it does not have any more Rule 20A eligible project locations due to their high percentage of existing underground lines.

Out of the original 181 communities which were considered active:

- Seven communities (Colma, Hillsborough, Kerman, Lafayette, Lemoore, San Anselmo, and West Sacramento) were originally identified as active due to project activity in 2011 or later. However, upon detailed review, it was determined that although the work credit subtraction took place in 2011 or later, the physical construction was completed prior to 2011.
- Seven communities (Clearlake, Colfax, Monterey, Morro Bay, Newman, Orinda, and Tiburon) also were originally identified as active due to project activity in 2011 or later. Detailed review showed no actual construction activity took place in all seven communities before the communities cancelled their projects. Since the communities cancelled the projects, PG&E considers their enabling ordinances null and void.
- Butte County was originally considered active due to a co-sponsored project with Oroville. However, the project area was annexed by Oroville reducing Butte County's participation in the project to a level that did not meet active criteria.
- Kings County was originally considered active because of the Lemoore Ave Project. However, it was determined that Kings County's participation was not a co-sponsorship. Instead, Kings County provided Lemoore 2.35M work credits and therefore did not meet the definition of active.

Two communities that were deemed active at the beginning of the 90-day period took action which inadvertently made them inactive at the end of the 90-day period:

- Kern County cancelled its resolution which disqualified them from being an active community as it no longer meets the definition of active.
- Fairfield cancelled its project prior to any construction activity and therefore no longer meets the definition of active.

In total five communities were not notified regarding their inactive status, 16 communities were misidentified as active, and two communities became inactive due to cancellations within the 90-day period. As such, PG&E believes that at these communities should be provided the same 90-day opportunity as other communities to become active. PG&E request that these inactive communities be provided an additional 90 days' notice to become an active undergrounding community and not subject to reallocation. PG&E will provide a revised reallocation calculation following the conclusion of the 90-day period.

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 April 7, 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:

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

Pursuant to General Order (GO) 96-B, Rule 5.1, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is March 18, 2020.

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.17-05-010. 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.17-05-010



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) #: 5783-E

Tier Designation: 1

Subject of AL: Revised Rule 20A Reallocation Calculation and Request for 90-Day Extension for Inactive Communities Due to Noticing Error

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 #:

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: 4/7/20

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: 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:

Attachment A
Rule 20A Program
Revised work credit reallocation to City of Live Oak

Pacific Gas & Electric Company
 Rule 20A Program
 Revised work credit reallocation to City of Live Oak

Community	Amount	Community	Amount
ALPINE COUNTY	94	MARIPOSA COUNTY	13,674
AMADOR CITY	207	MENDOTA	3,484
AMADOR COUNTY	14,474	MONTE SERENO	2,038
ATASCADERO	13,048	MONTEREY	17,502
ATHERTON	5,580	MORRO BAY	8,976
AVENAL	3,303	NEWMAN	4,682
BENICIA	9,738	OAKLEY	4,155
BIGGS	58	ORINDA	9,844
BLUE LAKE	1,465	PIEDMONT	3,054
BUELLTON	749	PLYMOUTH	909
BUTTE COUNTY	27,298	RED BLUFF	6,258
CALISTOGA	3,160	ROCKLIN	983
CARMEL	3,597	ROSEVILLE	76
CLEARLAKE	12,950	SACRAMENTO COUNTY	4,239
CLOVERDALE	3,419	SAN ANSELMO	3,363
COLFAX	848	SAN JUAN BAUTISTA	1,498
COLMA	39	SAN RAMON	7,901
CORTE MADERA	1,203	SARATOGA	15,833
DEL REY OAKS	1,522	SAUSALITO	7,675
EMERYVILLE	3,839	SCOTTS VALLEY	4,823
FAIRFIELD	24,160	SEBASTOPOL	4,013
FORT BRAGG	5,039	SHASTA COUNTY	37,913
FOSTER CITY	215	SHASTA LAKE	34
GLENN COUNTY	14,019	SISKIYOU COUNTY	155
GONZALES	2,010	SOLANO COUNTY	16,091
GUSTINE	1,550	SOLEDAD	3,142
HEALDSBURG	149	SONORA	3,581
HOLLISTER	2,916	STANISLAUS COUNTY	4,939
IONE	2,140	SUISUN CITY	4,513
JACKSON	1,451	SUTTER CREEK	2,458
KERMAN	2,344	TAFT	4,957
KERN COUNTY	94,264	TIBURON	4,925
KING CITY	324	TRINITY COUNTY	1,776
KINGS COUNTY	7,441	TULARE COUNTY	27,470
LAFAYETTE	3,726	WASCO	7,205
LASSEN COUNTY	1,684	WEST SACRAMENTO	6,377
LATHROP	1,658	WHEATLAND	1,552
LIVINGSTON	3,040	WILLIAMS	2,059
MANTECA	16,914	WILLOWS	3,278
MARICOPA	1,282	WOODSIDE	3,680
		Total	554,002

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