

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



**Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 5807E
As of May 11, 2020**

Subject: Pacific Gas and Electric Company's Conformed Bundled Procurement Plan Sales Framework (Appendix S) Update

Division Assigned: Energy

Date Filed: 04-13-2020

Date to Calendar: 04-15-2020

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	04-13-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8784

pgetariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

April 13, 2020

Advice 5807-E

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company's Conformed Bundled Procurement Plan – Sales Framework (Appendix S) Update

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this Advice Letter to update a certain process in PG&E's Conformed Bundled Procurement Plan (Conformed BPP): Sales Framework (Appendix S).

Background

By this Tier 1 Advice Letter submittal, PG&E updates a certain process relating to the Resource Adequacy (RA) Product and Import Capacity Counting Right section in the confidential portion of Appendix S to the Conformed BPP.

On December 2, 2019, PG&E submitted Tier 3 Advice Letter (AL) 5705-E, which among other things, requested approval of revisions to Appendix S.¹ On March 25, 2020, the California Public Utilities Commission (Commission or CPUC) issued Draft Resolution E-5046 approving AL 5705-E without modification. Draft Resolution E-5046 is expected to be on the agenda for the May 7, 2020, Commission Voting Meeting. Following the adoption of Draft Resolution E-5046, PG&E will submit a substitute sheet to this Advice Letter to consolidate the language in Appendix S that was approved in AL 5705-E and updated in this Advice Letter.

Attachment

Confidential Attachment A
Confidential Attachment B
Confidential Attachment C
Attachment D

Summary of Modification to Appendix S
Redline Version, Appendix S
Clean Version, Appendix S
Clean Version, Appendix S (Public Version)

¹ https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5705-E.pdf

Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than May 4, 2020, which is 21² 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

² The 20-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.

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 Letter become effective upon date of submittal, which is April 13, 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.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 U39 E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 5807-E

Tier Designation: 1

Subject of AL: Pacific Gas and Electric Company's Conformed Bundled Procurement Plan – Sales Framework (Appendix S) Update

Keywords (choose from CPUC listing): Procurement

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: See Confidential 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

Resolution required? ☐ Yes ☒ No

Requested effective date: 4/13/20

No. of tariff sheets: N/A

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:

Clear Form

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

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF ROBERT GOMEZ SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION CONTAINED IN PG&E'S
PROPOSED UPDATES TO THE BUNDLED PROCUREMENT PLAN
(ADVICE LETTER 5807-E)**

I, Robert Gomez, declare:

1. I am a Manager in the Portfolio Management department within the Energy Policy and Procurement organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include overseeing commercial planning activities, including position management at PG&E. 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 information.

2. Based on my knowledge and experience, and in accordance with Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in PG&E's Advice Letter 5807-E, request for Updates to the Bundled Procurement Plan, Appendix S submitted on April 13, 2020.

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 data and information covered by D.06-06-066. 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 April 13, 2020 at San Francisco, California.

/s/

ROBERT GOMEZ

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ADVICE LETTER 5807-E
APRIL 13, 2020

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
Confidential Attachment A – Summary of Modification to Appendix S	Pub. Util. Code§454.5(g)	This information includes PG&E’s confidential sales framework. Any discussion of PG&E’s sales strategies is market sensitive, because it will impact market participants’ bidding behavior for market products. Disclosure of this information could cause harm to PG&E’s customers and put PG&E at an unfair business advantage through non-competitive sales results.	Indefinite
Confidential Attachments B and C – Appendix S	Pub. Util. Code§454.5(g)	This information includes PG&E’s confidential sales framework. Any discussion of PG&E’s sales strategies is market sensitive, because it will impact market participants’ bidding behavior for market products. Disclosure of this information could cause harm to PG&E’s customers and put PG&E at an unfair business advantage through non-competitive sales results.	Indefinite

PACIFIC GAS AND ELECTRIC COMPANY

Attachment A

Summary of Modification to Appendix S

(CONFIDENTIAL)

PACIFIC GAS AND ELECTRIC COMPANY

Attachment B

Redline Version, Appendix S

(CONFIDENTIAL)

PACIFIC GAS AND ELECTRIC COMPANY

Attachment C

Clean Version, Appendix S

(CONFIDENTIAL)

PACIFIC GAS AND ELECTRIC COMPANY

Attachment D

Clean Version, Appendix S (Public Version)

PACIFIC GAS AND ELECTRIC COMPANY

Attachment D

Clean Version, Appendix S (Public Version)



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No.
Pacific Gas and Electric Company
2014 Bundled Procurement Plan

APPENDIX S
SALES FRAMEWORK

CONFIDENTIAL

Issued by
Steven Malnight
Senior Vice President
Regulatory Affairs

Date Filed _____
Effective _____
Resolution No. _____



A. Introduction/Background

This Appendix describes the standards and criteria for Pacific Gas and Electric Company's (PG&E's) management and sales of physical energy-only products, Forward Energy from non-Renewables Portfolio Standard (non-RPS) eligible hydro resources or nuclear resources (Carbon Free Energy), Resource Adequacy (RA) Products, and Import Capacity Counting Rights. Due to customer load departure, PG&E may encounter scenarios in which portfolio products exceed the requirements of the portfolio. In these situations, the Sales Framework guides actions PG&E will take. In addition, any transactions under this Sales Framework Appendix will be filed for approval through the Quarterly Compliance Reports (QCR), as required by the Bundled Procurement Plan (BPP).

B. Overview of Sales Framework

This section provides a description of the commercial processes and activities that PG&E will pursue to manage any sales of its portfolio of physical energy, carbon free energy, RA Product, and Import Capacity Counting Rights. These processes and activities include: (1) product terms and volumes; (2) commercial processes; and (3) evaluation methodologies. PG&E will offer resource adequacy capacity from resources located in Local Reliability Areas¹ for delivery periods covering all three years in the multiyear framework adopted in Decision (D.) 19-02-022.

¹ Local Reliability Areas refers to Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.



1. Physical Energy-only Sales

[REDACTED]

2. Carbon Free Energy

[REDACTED]

[REDACTED]





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No.
Pacific Gas and Electric Company
2014 Bundled Procurement Plan

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Decision No.

Issued by
Steven Malnight
Senior Vice President
Regulatory Affairs

Date Filed _____
Effective _____
Resolution No. _____



A series of horizontal black bars of varying lengths, some with small white gaps, arranged in a vertical column. The bars are stacked vertically, with some having small white gaps between them. The overall shape is irregular, resembling a stylized letter 'E' or a comb.

⁴ Local Area refers to the separate Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.



[Redacted Content]

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Senior Vice President
Regulatory Affairs

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[Redacted content]

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Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No.
Pacific Gas and Electric Company
2014 Bundled Procurement Plan

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[REDACTED]

[REDACTED]

[REDACTED]

c. Contract Terms

PG&E will only sell RA products using an Edison Energy Institute (EEI) enabling agreement and a PG&E RA confirmation agreement. Sale transactions of RA products will not be facilitated through a Western Systems Power Pool (WSPP) enabling agreement. Additionally, PG&E will not post collateral or performance assurance for any RA product sales.

d. Commercial Process

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Solicitation ⁵	Delivery Term ⁶	Products	Anticipated Date
Q4 through Balance of Year 2019	Monthly, through December 2019	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	July/August 2019
Annual Multiyear (2020 – 2022)	Monthly, January through December (2020 – 2022)	System RA with/without Flex Import Capacity Counting Rights Local RA with/without Flex RA Swaps	Q3 2019 ⁷
February through Balance of Year 2020	Monthly, February through December 2020	System RA with/without Flex Import Capacity Counting Right Local RA with/without Flex RA Swaps	November 2019
Q2 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	January 2020
Q3 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	April 2020
Q4 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	July/August 2020

⁵ If PG&E does not have available products to sell, PG&E will not issue a solicitation.

⁶ This table does not guarantee availability of product for the delivery period offered. Quantity is subject to meeting the requirements as described in this Appendix.

⁷ PG&E will issue at least one solicitation to cover the delivery term of three years under the multiyear framework.

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Annual Multiyear (2021 – 2023)	Monthly, January through December (2021 – 2023)	System RA with/without Flex Import Capacity Counting Rights Local RA with/without Flex RA Swaps	Q3 2020 ⁸
February through Balance of Year 2021	Monthly, February through December 2021	System RA with/without Flex Import Capacity Counting Right Local RA with/without Flex RA Swaps	November 2020

[REDACTED]

[REDACTED]

⁸ PG&E will issue at least one solicitation to cover the delivery term of three years under the multiyear framework.





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Pacific Gas and Electric Company
2014 Bundled Procurement Plan

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Pacific Gas and Electric Company
San Francisco, California

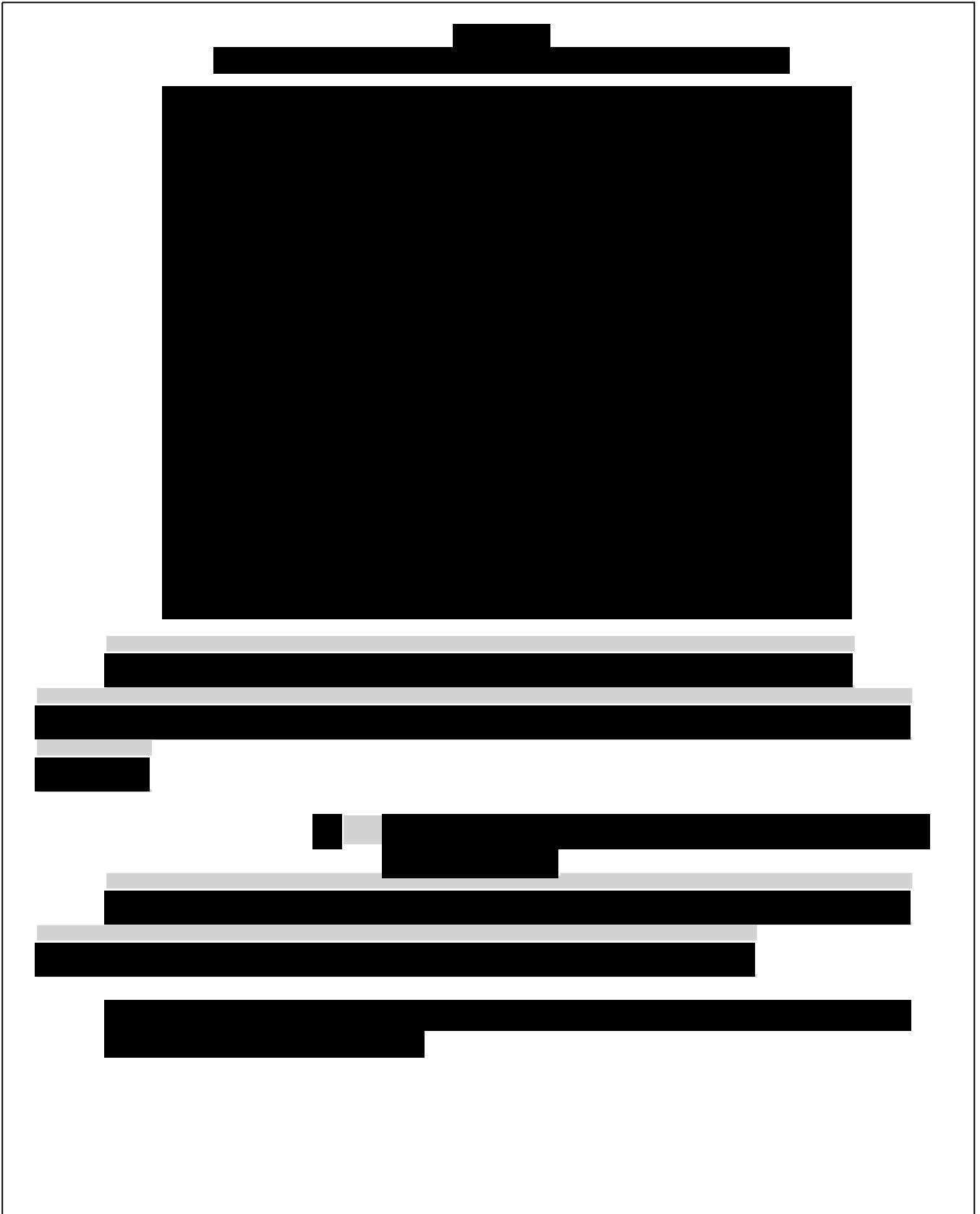
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Resolution No. _____



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