

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



November 17, 2020

Advice Letter 5815-E, 5815-E-A

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: Procurement Transaction Quarterly Compliance Submittal (Q1, 2020).

Dear Mr. Jacobson:

Advice Letter 5815-E, 5815-E-A is effective as of May 30, 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

November 5, 2020

Advice 5815-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Procurement Transaction Quarterly Compliance Filing (Q1, 2020)

Purpose

Pacific Gas and Electric Company (“PG&E”) is submitting this advice letter to the California Public Utilities Commission (“Commission” or “CPUC”) related to its Procurement Transaction Quarterly Compliance Report (“QCR”) for record period January 1, 2020 to March 31, 2020, (Q1-2020) to replace and/or supplement the material in Confidential Attachments B, F and K of Advice Letter 5815-E. Please note the Confidential Attachment B document and Confidential Attachments F and K Summary documents replace the previous submittal; Confidential Attachment F Correspondence and Meeting Materials and Confidential Attachment K Strategy Paper documents are being provided as additional documentation.

Background

Advice Letter 5815-E

PG&E submitted its QCR for Q1-2020 on April 30, 2020 in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports to be submitted within 30 days of the end of the quarter.

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Per discussions with CPUC, UAFCB staff, PG&E is submitting this supplemental advice letter in response to UAFCB’s audit findings:

Confidential Attachments

Attachment 1: Revised Confidential Attachment B - CLEAN Non-Investment Grade Counterparties

Attachment 2: Revised Confidential Attachment B - REDLINE
Non-Investment Grade Counterparties

Attachment 3: Revised Confidential Attachment F Summary
Key Briefing Packages

Attachment 4: Confidential Attachment F Correspondence
Key Briefing Packages

Attachment 5: Confidential Attachment F PRG Meeting Materials
Key Briefing Packages

Attachment 6: Revised Confidential Attachment K Summary
Risk Management Strategy

Attachment 7: Confidential Attachment K Strategy Papers
Risk Management Strategy

Protests

PG&E asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 5815-E and not reopen the protest period.

Effective Date

PG&E requests that this Tier 2 advice letter become effective concurrent with original Advice Letter 5815-E on May 30, 2020, which is 30 calendar days after the original date of submittal.

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 service list for Rulemaking ("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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

- Attachment 1: Atch 1 Revised Confidential Attach B-CLEAN.docx
- Attachment 2: Atch 2 Revised Confidential Attach B-REDLINE.docx
- Attachment 3: Atch 3 Revised Confidential Attachment F Summary
- Attachment 4: Atch 4 Confid Attchment F Qtr01 2020.zip
- Attachment 5: Atch 5 Confid Attchment F PRG Meeting Materials.zip
- Attachment 6: Atch 6 Revised Confidential Attachment K Summary.docx
- Attachment 7: Atch 7 Attachment K – Risk Strategy Papers.zip
- Attachment 8: Confidentiality Declaration and Matrix

cc: Service List R.16-02-007 (Public Version)
PG&E's Procurement Review Group (Confidential Version)



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) #: 5815-E-A

Tier Designation: 2

Subject of AL: Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q1, 2020)

Keywords (choose from CPUC listing): Compliance, Procurement

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 and D.03-12-062

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 Declarations 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: Marianne Aikawa, (415)973-0375, MLC0@pge.com

Resolution required? Yes No

Requested effective date: 5/30/20

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:

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Attachment 1

Revised Confidential Attachment B - CLEAN

Advice 5815-E-A
November 5, 2020

Attachment 2

Revised Confidential Attachment B - REDLINE

Advice 5815-E-A
November 5, 2020

Attachment 3

Revised Confidential Attachment F Summary

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Attachment 4

Confidential Attachment F Correspondence

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November 5, 2020

Attachment 5

Confidential Attachment F PRG Meeting Materials

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Attachment 6

Revised Confidential Attachment K Summary

Advice 5815-E-A
November 5, 2026

Attachment 7

Confidential Attachment K Strategy Papers

Advice 5815-E-A
November 5, 2020

Attachment 8

Confidentiality Declaration and Matrix

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING
SUPPLEMENTAL ADVICE LETTER 5815-E-A**

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S
SUPPLEMENTAL ADVICE LETTER 5815-E-A, Q1 2020 QCR:
CONFIDENTIAL ATTACHMENTS 1 AND 2: NON-INVESTMENT GRADE
COUNTERPARTIES,
CONFIDENTIAL ATTACHMENTS 3, 4 AND 5: KEY BRIEFING PACKAGES, AND
CONFIDENTIAL ATTACHMENTS 6 AND 7: RISK MANAGEMENT STRATEGY**

I, Marianne Aikawa, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1989. My current title is Senior Manager within PG&E's Energy Policy and Procurement organization. In this position my responsibilities include reviewing regulatory reports. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. 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 ("D.") 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's November 5, 2020 Supplemental Advice Letter 5815-E-A, Q1 2020 QCR for Confidential Attachments 1 and 2 Non-Investment Grade Counterparties, Confidential Attachments 3, 4 and 5 Key Briefing Packages, and Confidential Attachments 6 and 7 Risk

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5815-E-A
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q1 2020
 NOVEMBER 5, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report Supplemental Advice Letter 5815-E-A			
<ul style="list-style-type: none"> • Atch 1 Revised Confidential Attach B-CLEAN.doc • Atch 2 Revised Confidential Attach B-REDLINE.doc 	Public Utilities Code Section 454.5(g)	The information contains confidential counterparty information. Release of this commercially market sensitive information could impact market prices because it would release financing terms to other market participants and impact future negotiations. This could cause harm to PG&E's customers, and put PG&E at an unfair business disadvantage by the disclosure of counterparty information. This information could be used by other market participants to gain a commercial advantage.	3 Years
<p>Attachment F – in its entirety: PRG Material</p> <ul style="list-style-type: none"> • Atch 3 Revised Confidential Attach F Summary.docx • Atch 4 Confidential Attachment F Correspondence.zip • Atch 5 Confidential Attachment F PRG Meeting Materials.zip 	D.06-06-066 and Public Utilities Code Section 454.5(g)	<p>Presentations to the PRG include a variety of confidential commercially market sensitive information, including information about e-solicitation, bilateral contracts, pricing information, strategy discussions, recently issued RFO's, etc.</p> <p>Release of this commercially market sensitive information could impact market prices, cause harm to PG&E's customers, and put PG&E at an unfair business disadvantage by the disclosing this information. This information could be used by other market participants to gain a commercial advantage.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Length of Time for Specific Items identified in D.06-06-066 Matrix or Indefinite (for GHG information)
<p>Attachment F – in its entirety: PRG Material-GHG Information</p> <ul style="list-style-type: none"> • Atch 3 Revised Confidential Attach F Summary.docx • Atch 4 Confidential Attachment F Correspondence.zip • Atch 5 Confidential Attachment F PRG Meeting Materials.zip 	D.14-10-033	<p>Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5815-E-A
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q1 2020
 NOVEMBER 5, 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 Date To Be Kept Confidential
<ul style="list-style-type: none"> • Atch 6 Revised Confidential Attachment K Summary.doc • Atch 7 Confidential Attachment K-Strategy Papers.zip 	<p>Item XII – Monthly Portfolio Risk Assessment of Appendix 1 of D.06-06-066 for three years.</p> <p>Public Utilities Code 454.5(g)</p>	<p>Value at Risk (VaR) or electric and gas for electric generation is deemed confidential the matrix. Public disclosure of TeVaR results would be detrimental for PG&E and its electric customers. Such disclosure would release confidential, sensitive market intelligence that would place PG&E at an unfair disadvantage in the energy and financial markets.</p> <p>Risk and Strategy papers are proprietary company information that if publicly could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage.</p>	<p>3 years</p> <p>Indefinite</p>

**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5815-E-A
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q1 2020
 NOVEMBER 5, 2020**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	D.14-10-033, GHG Confidential Information Matrix (As corrected by D. 15-01-024)	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Document: Quarterly Compliance Report Supplemental Advice Letter 5815-E-A			
Confid Atchment F: • Atch 4 Confidential Attachment F Correspondence.zip • Atch 5 Confidential Attachment F PRG Meeting Materials.zip File name: 3-13-20 PGE Joint CAM_PRG Meeting – March 17, 2020 (ED 1 of 2).pdf, email attachment PGE PRG Pres GHG Position Update_031720.pdf, “Market Data Review, GHG Dispatch Curve”, page 5	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, “ARB Confidential” information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

Downey & Brand
East Bay Community Energy
Ellison Schneider & Harris LLP
Energy Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF

IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy