

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 dark ink that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

April 30, 2020

Advice 5815-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

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

Purpose

Pacific Gas and Electric Company ("PG&E") hereby submits to the California Public Utilities Commission ("Commission" or "CPUC") its compliance submittal for Q1 2020 in conformance with PG&E's 2014 BPP approved in D.15-10-031. PG&E's submittal of this Procurement Transaction Quarterly Compliance Report ("QCR") for record period January 1, 2020 through March 31, 2020, (Q1, 2020) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports be submitted within 30 days of the end of the quarter.

Background

In D.07-12-052, the Commission directed Energy Division and the Investor-Owned Utilities ("IOUs") to continue the collaborative effort to develop a reformatted QCR. The Commission authorized Energy Division to implement a reformatted QCR and to make ministerial changes to the content and format of the report as needs arise. Energy Division and the IOUs finalized the QCR format in December 2008. This QCR is consistent with the final format authorized by Energy Division on December 15, 2008.

Compliance Items

Attachment 1 to this Advice Letter includes a narrative with supporting Confidential Attachments that conforms to the reformatted QCR. The public version of Attachment 1 includes the Narrative, which is not confidential. Attachments 2 and 3 include the public versions of Attachments G and H, respectively. The confidential version of the QCR includes the following supporting Confidential Attachments:

Attachment A: Q1 2020 Electric and Natural Gas Transactions
Attachment B: Q1 2020 Counterparty Information
Attachment C: Q1 2020 Electric Transactions Summary
Attachment D: Q1 2020 Natural Gas Transactions Summary

Attachment E: Q1 2020 Other Transactions
Attachment F: Q1 2020 Key Briefing Packages
Attachment G: Q1 2020 Independent Evaluator (IE) Reports
Attachment H: Q1 2020 Contracts Executed/Contracts Amended
Attachment I: Q1 2020 Summary of Retained Generation Investments Completed
Attachment J: System Load Requirements/Conditions
Attachment K: Risk Management Strategy Communication and Management Disclosure
Attachment L: Reasonable Number of Analyses Models, Description of Models, and How Models Operate
Attachment M: Q1 2020 Transactions Subject to Strong Showing

Attachment 4 to this Advice Letter includes confidentiality declarations and a matrix.

The public version of this QCR is provided to the service lists for Rulemakings ("R.") 16-02-007. The confidential version of the QCR is provided to PG&E's Procurement Review Group.

This submittal will 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 filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than May 20, 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

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is May 30, 2020, which is 30 days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter excluding the confidential appendices is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for R.16-02-007. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail 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. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

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

Public Attachments:

Attachment 1: Narrative

Attachment 2: Attachment G (Public Version)

Attachment 3: Attachment H (Public Version)

Attachment 4: Confidentiality Declarations and Matrix



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

Tier Designation: 2

Subject of AL: 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: Jay Bukowski (415) 973-1727, John Ulloa (415) 973-0535

Resolution required? ☐ Yes ☒ No Marianne Aikawa (415)973-0375

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:

Clear Form

Advice 5815-E
April 30, 2020

Attachment 1

Narrative

PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT
FOR THE FIRST QUARTER OF 2020

April 30, 2020

TABLE OF CONTENTS

A. Introduction.....	1
B. Summary	1
1. Competitive Solicitations (Approval Through the Quarterly Compliance Report).....	1
2. Other Competitive Solicitations (Approval Through Separate Advice Filing or Regulatory Process)	1
3. Other Procurement Activities (Approval Through the Quarterly Compliance Report)	2
a) Electric Transactions.....	2
b) Gas Transactions.....	2
4. Other Procurement Activities (Approval Through Separate Advice Filing or Regulatory Process)	3
C. Master Data Request (MDR) Documentation.....	3
1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.....	4
2. The briefing package provided to the ultimate decision maker.	4
3. Description of and justification for the procurement processes used to select the transactions.....	4
a) Electric Procurement – Description	4
b) Electric Procurement – Justification	5
c) Natural Gas Procurement – Description	7
d) Natural Gas Procurement – Justification	8
e) GHG and Other Commodities	10
4. Explanation/justification of the timing of the transactions.	10
a) Electric Transactions.....	10
b) Natural Gas Transactions.....	10
5. Discussion of the system load requirements/conditions underlying the need for the Quarter’s transactions.	11
a) PG&E Participation in the CAISO Markets	11
b) PG&E-Owned Generation Conditions.....	11
6. Discussion of how the Quarter’s transactions meet the goals of the risk management strategy reflected in the Plan.	13
7. Copy of each contract.	13
8. The valuation results for the contract(s) (for contracts of three months or greater duration).....	13
9. An electronic copy of any data or forecasts used to analyze the transactions.	13
10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.	14

TABLE OF CONTENTS
(CONTINUED)

11. Any other information sought by the Commission under the Pub. Util. Code.....	14
D. Additional Reporting Requirement Pursuant to D.07-01-039	14
E. Cost Allocation Mechanism (CAM).....	14

Summary of Public Attachments

- Public Attachment G: *Independent Evaluator Reports*, provides any relevant Independent Evaluator (IE) report(s) completed during the Quarter redacted to protect confidential information.
- Public Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter redacted to protect confidential information.

Summary of Confidential Attachments

- Confidential Attachment A: *Transactions*, provides a summary of all transactions executed during the Quarter, which are less than five years in length and that have not been filed through a separate advice filing or application.
- Confidential Attachment B: *Counterparty Information*, provides a summary of (1) all non-investment grade counterparties with whom PG&E transacted; and (2) the top 10 counterparties by volume during the Quarter.
- Confidential Attachment C: *Electric Transactions Summary*, provides a summary of the electric transactions executed during the Quarter.
- Confidential Attachment D: *Natural Gas Transactions Summary*, provides a summary of the gas transactions executed during the Quarter.
- Confidential Attachment E: *Other Transactions*, provides the executed transactions for non-energy-related products during the Quarter.
- Confidential Attachment F: *Key Briefing Packages*, provides a summary of all relevant Procurement Review Group (PRG) agendas and presentations presented.
- Confidential Attachment G: *Independent Evaluator Reports*, provides any relevant IE report(s) completed during the Quarter.
- Confidential Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter.

Summary of Confidential Attachments
(Continued)

- Confidential Attachment I: *Summary of Retained Generation Investments Completed*, provides a summary of any investments related to retained generation facilities and multiple contracts for the same supplier, resource or facility, consistent with the requirements of D.07-01-039.
- Confidential Attachment J: *System Load Requirements/Conditions*, provides a summary of all information related to addressing PG&E's residual net open position.
- Confidential Attachment K: *Risk Management Strategy Communication and Management Disclosure*, provides a summary of all procurement-related risk strategies and issues communicated to PG&E's senior management.
- Confidential Attachment L: *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*, provides a summary of any models related to the relevant transactions identified in this filing.
- Confidential Attachment M: *Transactions Subject to Strong Showing*, provides a summary and supporting documentation for strong showing transactions.

A. Introduction

As required by Ordering Paragraph (OP) 8 of Decision (D.) 02-10-062, and clarified in D.03-06-076, D.03-12-062, D.04-07-028, D.04-12-048 and D.07-12-052, Pacific Gas and Electric Company (PG&E) hereby provides its report demonstrating that its procurement-related transactions during the period January 1, 2020 through March 31, 2020 (Quarter), were in compliance with PG&E's Bundled Procurement Plan (BPP or Plan) approved by the California Public Utilities Commission (CPUC or Commission) in D.15-10-031.

PG&E manages its transactions in compliance with its BPP. During the Quarter, PG&E had the following BPP activity updates:

- Advice Letter 5704-E (Electric Portfolio Hedging Plan), submitted December 2, 2019 was approved on January 10, 2020.
- Advice Letter 5725-E (Appendix C –Procurement Limits & Ratable Rates), submitted December 20, 2019 was approved on January 15, 2020.
- Advice Letter 5705-E (Appendix S – Sales Framework and Appendix P – Carbon Free Energy), submitted December 2, 2019 Draft Resolution was issued March 25, 2020, pending approval.

B. Summary

During the Quarter, PG&E engaged in the following procurement activities in accordance with its BPP-approved procurement methods and practices:

1. Competitive Solicitations (Approval Through the Quarterly Compliance Report)

- a. None for the Quarter.

2. Other Competitive Solicitations (Approval Through Separate Advice Filing or Regulatory Process)

PG&E is seeking approval through separate advice filings or other regulatory processes and are referenced here for informational purposes only:

- a. Bioenergy Market Adjusting Tariff (bi-monthly auctions), ongoing
- b. Renewable Market Adjusting Tariff (ReMAT) (bi-monthly auctions)¹

¹ The ReMAT Program was suspended on December 15, 2017 by the Executive Director of the CPUC.

- c. Vantage Firming and Shaping Request for Offers (RFO) (issued February 15, 2019)
- d. Winter Regional Renewable Choice RFO (aka Enhanced Community Renewables (issued November 13, 2018)
- e. 2018 Oakland Clean Energy Initiative (issued April 13, 2018)
- f. December 2019 Bundled RPS Energy Sale Solicitation (Short-Term REC Sales) (issued December 16, 2019)
- g. 2019 System Reliability RFO, Distributed Generation Enabled Microgrid Services (DGEMS) (issued December 11, 2019, suspended until further notice)
- h. 2020 Biomethane RFO (issued January 10, 2020, suspended until further notice)
- i. 2020 System Reliability Request for Offers (SR RFO Phase 1) (issued February 28, 2020)
- j. 2020 Distribution Investment Deferral Framework (DIDF) RFO (issued January 15, 2020)
- k. 2020 Spring Disadvantage Communities (DAC) Solicitation (issued March 5, 2020)

3. Other Procurement Activities (Approval Through the Quarterly Compliance Report)

PG&E also seeks approval of transactions executed from the following procurement activities, other than competitive solicitations, through the Quarterly Compliance Report (QCR).

a) Electric Transactions

- i. California Independent System Operator (CAISO) Allocations and Auctions
 - a. CAISO Monthly Congestion Revenue Rights (CRR) Allocation Processes
- ii. CAISO Markets and Processes
 - a. Convergence Bidding
- iii. Direct Bilateral Contracting for Short-Term Products
- iv. Bilateral Negotiated Contracts
- v. Electronic Solicitations issued by PG&E
- vi. Market Request for Proposal (RFP)
- vii. Transparent Exchange

b) Gas Transactions

- i. Transparent Exchanges
- ii. Direct Bilateral Contracting for Short-Term Products
- iii. Voice Brokers

- iv. Electronic Solicitations
- v. Cashouts

These procurement activities are described in greater detail in Section C.3, below.

4. Other Procurement Activities (Approval Through Separate Advice Filing or Regulatory Process)

During the Quarter, approval of contracts resulting from the following procurement activities was requested through separate advice filings or regulatory processes and are referenced here for informational purposes only:

- a. Bilaterally negotiated contracts or amendments executed pursuant to other regulatory requirements.
 - i. For the quarter, there are no bilaterally negotiated contracts or amendments executed pursuant to other regulatory requirements.
- b. QF contracts or amendments executed pursuant to other regulatory requirements.
 - i. Hydro Sierra Energy LLC (Deadwood Creek): Pursuant to Qualifying Facility/Combined Heat and Power (QF/CHP) Settlement,² PG&E executed a Public Utility Regulatory Policies Act (PURPA) Power Purchase Agreement (PPA) with Hydro Sierra Energy LLC (Deadwood Creek) on February 27, 2020. Relevant information is included in the Informational Only section of Attachment H. Advice Letter Filing is pending.

C. Master Data Request (MDR) Documentation

D.02-10-062, Appendix B, as clarified by D.03-06-076, sets forth specific elements to be addressed in this report. Each element is discussed below.

² See Decision Adopting Proposed Settlement, D.10-12-035.

1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.

All procurement-related activity during the Quarter was approved and executed either by, or under the direction of, Fong Wan, Senior Vice President, Energy Policy and Procurement; Gillian Clegg, Senior Director, Electric and Gas Acquisition; Martin Wyspianski, Senior Director, Energy Portfolio Procurement and Policy; Marino Monardi, Director, Structured Energy Transactions; Scott Ranzal, Director, Portfolio Management; Chris McNeece, Director, Short-Term Electric Supply; and/or John Ulloa, Manager, Electric Gas Supply consistent with the delegation of authority effective for the period.

2. The briefing package provided to the ultimate decision maker.

The “decision-maker” for a particular contemplated transaction depends on many factors, such as term, volume, and notional value. For many of the transactions during the Quarter, the “decision-maker” was a gas or power trading employee executing transactions per an established plan or to achieve a particular objective (such as balancing the portfolio supply and demand). For such transactions, briefing packages are not prepared. Briefing packages prepared during the Quarter for transactions or procurement activities that required senior management approval are included in Confidential Attachment K. In addition, copies of presentations made by PG&E to its PRG during the Quarter are included in Confidential Attachment F.

3. Description of and justification for the procurement processes used to select the transactions.

a) Electric Procurement – Description

PG&E is authorized to use any of the following BPP-approved electricity procurement transaction processes during the Quarter:

- Competitive Solicitations
- CAISO Allocations and Auctions
- CAISO Markets and Process
- Direct Bilateral Contracting for Short-Term Products

- Bilateral Negotiated Contracts
- Electronic Solicitations issued by PG&E
- Market Request for Proposal (RFP)
- E-Solicitation, Transparent Exchanges, Voice and On-Line Brokers
- QF/CHP Amendments Executed under the CHP Settlement (for informational purposes only)
- Pro forma contracts executed under the CHP Feed-In Tariffs Program (for informational purposes only)

b) *Electric Procurement – Justification*

- i. *For competitive solicitations held by PG&E, describe the process used to rank offers and select winning bid(s).*

None for the Quarter.

- ii. *For other transactional methods, provide the documentation supporting the selection of the chosen products.*

The approved procurement processes used during the Quarter and supporting documentation include the following:

- CAISO Allocations and Auctions

CAISO Monthly CRR Allocation Process

PG&E procures CRRs to narrow the distribution of PG&E's energy procurement costs due to expected electric transmission congestion. PG&E obtains CRRs, subject to risk assessment, for specific source/sink combinations as approved in its BPP.

PG&E acquires CRRs for any path (represented by a source-sink pair) connecting existing generation sources to existing loads (e.g., retail loads and Helms pumping load) or for any path that PG&E reasonably anticipates that it might need to flow energy in the future due to the addition of new contracts, resources or load obligations. Additionally, there may be CRRs which are positively correlated in value with CRRs for paths that have limited availability. PG&E is also authorized to acquire CRRs for such positively correlated paths.

PG&E estimated that a portion of its generation, imports and load in the months of February 2020, March 2020, and April 2020, remained exposed to congestion risk, and, therefore, participated in the CAISO's monthly CRR allocation process to obtain CRRs to mitigate this risk. In January 2020, February 2020, and March 2020, PG&E participated in the CAISO's monthly CRR allocation processes to procure CRRs for February 2020, March 2020, and April 2020, respectively.

PG&E's procurement during the Quarter was consistent with PG&E's updates to its BPP Congestion Revenue Rights (Appendix I) filed in Advice Letter 5473-E, effective May 30, 2019.

Relevant information for the Monthly CRRs is included in Confidential Attachments F, J and L.

- CAISO Markets and Processes

- Convergence Bidding

- PG&E suspended Convergence Bidding activities after trade day May 26, 2018. As of March 31, 2020, all Convergence Bidding activities remain suspended. Relevant information is included in Confidential Attachment E, F and J.

- Direct Bilateral Contracting for Short-Term Products

- Transmission capacity is purchased to relocate power from one point to another, often necessary outside a Regional Transmission Operator such as the CAISO. Relevant information is included in Confidential Attachment A.

- Bilateral Negotiated Contracts

- Resource Adequacy (RA) – During the Quarter, PG&E executed transactions consisting of the following types: (1) System RA purchase transactions; (2) System RA sale transactions; (3) Local RA purchase transactions; (4) Local RA sale transactions; and (5) Import Allocation Rights sale transactions. Relevant information is included in Confidential Attachment E, F, H and M.

- Electronic Solicitations issued by PG&E

- Import Energy – During the Quarter, PG&E executed firm energy transactions at selected import delivery locations. Relevant information is included in Confidential Attachment A.

- Resource Adequacy (RA) – During the Quarter, PG&E executed the following transaction types: (1) System RA purchase transactions; (2) System RA sale transactions; (3) Local RA purchase transactions; (4) Local RA sale transactions; and (5) Import Allocation Rights sale transactions. Relevant information is included in Confidential Attachments E, F, H and L.

The RA and Import Energy transactions were monitored by an Independent Evaluator (IE) as part of the 2020 Balance of the Year RA and Import Energy E-Solicitation. The IE report for these transactions is included in this filing. Relevant information is included in Confidential Attachment G.

- Market Request for Proposal (RFP) – During the Quarter, PG&E participated in the Joint CCAs Market RFP and executed Local RA

purchase transactions. Relevant information is included in Confidential Attachments E, F, and H.

- E-Solicitation, Transparent Exchange, or Voice and On-Line Brokers – During the Quarter, PG&E executed electric financial transactions via E-Solicitation or Transparent Exchange (including voice and on-line brokers). Relevant information is included in Confidential Attachments A and L.

- QF/CHP Legacy Contracts (for informational purposes only)

Under the QF/CHP Program, QF generators may enter into one of two pro forma PPAs (i.e., PURPA PPA for QFs up to 20 megawatts (MW), and As-Available PPA for CHP up to 20 MW. In addition, many of the remaining legacy QF contracts are still active and may require amendments or letter agreements to help the generator meet the requirements of the Commission's CHP Program (e.g., greenhouse gas (GHG) administration and metering issues) that were not required under the former program. Relevant information is included in the "Informational Purposes Only" Section of Attachment H.

- CHP Feed-In Tariffs (for informational purposes only)

Under the Waste Heat and Carbon Emissions Act, codified as California Public Utilities Code (Pub. Util. Code) Section 2840 et seq. (Stats. 2007, Ch. 713), the Commission established a standard tariff for the sale of electricity from efficient CHP systems under 20 MW and directed the electrical corporations to purchase excess electricity from eligible CHP generators. A CHP generator that is certified by the California Energy Commission (CEC) is eligible under the CEC's legal and technical guidelines to obtain a CHP feed-in tariff. In D.09-12-042, the Commission approved three pro forma contracts for use with CHP systems (known as "AB 1613 PPAs") that are applicable to generators of different sizes: a standard contract for CHP generators up to 20 MW, a simplified PPA for CHP generators less than 5 MW, and a further simplified PPA for smaller CHP systems under 500 kilowatts. Relevant information is included in the "Informational Purposes Only" section of Attachment H.

c) Natural Gas Procurement – Description

PG&E procured natural gas during the Quarter using various BPP-approved procurement processes and methods, including:

- Competitive Solicitations
- Transparent Exchanges
- Direct Bilateral Contracting for Short-Term Products
- Voice and On-Line Brokers

- Electronic Solicitations
- Cashouts

d) Natural Gas Procurement – Justification

- i. *For competitive solicitations (RFOs), describe the process used to rank offers and select winning bid(s).*

PG&E did not execute any contracts during this Quarter through competitive solicitations for approval through this QCR.

- ii. *For other transactional methods, provide the documentation supporting the selection of the chosen products.*

- Transparent Exchanges: Electronic trading exchanges for transparent prices:

Commodity Purchases/Sales – PG&E buys and sells physical natural gas on Intercontinental Exchange (ICE) and the ICE Natural Gas Exchange (ICE/NGX) physical clearing service. ICE is an electronic system that matches buyers and sellers of natural gas products. Once buyer and seller are matched, ICE trades become bilateral trades. ICE/NGX trades are cleared by NGX, rather than bilaterally. Physical transactions in the Quarter include next-day and same-day transactions, for delivery periods of one to five days, and monthly transactions for deliveries each day of a calendar month. Relevant information of transactions executed via Transparent Exchanges during the QCR period is included in Confidential Attachment A.

Gas Financial Transactions – PG&E’s procurement during the Quarter is consistent with PG&E’s updates to its BPP Hedging Plan (Appendix E) filed in Advice Letter 5704-E.

Gas Financial Transactions are cleared through exchanges (ICE or the New York Mercantile Exchange (NYMEX)). ICE and NYMEX provide access to anonymous bids and offers establishing both a liquid and robust market for financial products, and a benchmark for over-the-counter products. These products include Henry Hub futures and options, and basis futures against the industry benchmark indices, including Gas Daily, Natural Gas Intelligence (NGI) and Inside FERC (IFERC) Gas Market Report. Details demonstrating PG&E’s compliance with D.15-10-031 during the QCR period are included in Confidential Attachments J and L. Relevant information executed during the QCR period is included in Confidential Attachment A.

- Direct Bilateral Contracting for Short-Term Products

Commodity Purchases/Sales – PG&E buys and sells physical gas directly with counterparties in the bilateral market. Spot gas (deliveries less than one month) is traded at fixed prices and daily index (Gas Daily). Prompt month supply (deliveries each day of the following month) and

term gas (greater than one month forward or one month in duration) is traded at fixed price, daily index (Gas Daily), or monthly or bi-week index (NGI, or IFERC) prices. For any bilateral physical supply trades with a term of one month, PG&E concluded these transactions bilaterally, but also used electronic solicitation methods, such as instant messaging, e-mail, voice solicitation (telephone), Real-Time Market (RTM) prices, and/or broker quotes, to inform and conduct these transactions. Relevant information executed during the QCR period is included in Confidential Attachments A and M.

- Voice and On-Line Brokers – Gas Financial Transactions

PG&E executes natural gas financial transactions (futures) through voice brokers that resulted in exchange-cleared trades. Brokers provide access to anonymous bids and offers from both over-the-counter parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled over-the-counter or cleared through NYMEX or ICE. The broker market trades the same financial products as the exchanges. Relevant information of transactions executed via voice brokers during the QCR period is included in Confidential Attachment A.

- Voice and On-Line Brokers – Commodity Purchases/Sales

PG&E executes physical gas supply transactions through voice brokers that resulted in transactions. Brokers provide access to anonymous bids and offers from both over-the-counter parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled over-the-counter or cleared through NGX. The broker market trades the same products as the bilateral market. Relevant information of transactions executed via voice brokers during the QCR period is included in Confidential Attachment A.

- Electronic Solicitations

Conducted via Instant Messaging and Telephone – PG&E conducts electronic solicitations for the purchase of physical gas supply, with delivery terms one month or longer, using instant messaging and telephone. In this way, PG&E is able to obtain robust price quotes from the marketplace, in real time, and may then execute with the counterparty with the best offer(s). Relevant information of transactions executed via electronic solicitation during the QCR period is included in Confidential Attachment A.

- Cashouts: Commodity Purchases/Sales

Cashouts are used by gas pipelines, according to their tariff, to cure certain imbalances between supply and demand. When a pipeline applies a cashout, it results in a commodity transaction.

e) GHG and Other Commodities

- i. For competitive solicitations, describe the process used to rank offers and select winning bid(s).*
 - PG&E did not execute any contracts during this Quarter through competitive solicitations for approval through this QCR.
- ii. For other transactional methods, provide the documentation supporting the selection of the chosen products.*
 - PG&E received its annual allocation of Electric Distribution Utility (EDU) Current Vintage allowances for the 2020 year from the California Air Resources Board (CARB) in October 2019. All of the EDU allowances will be consigned into the 2020 CARB Auctions as required by the regulations and consistent with PG&E's BPP. CARB and Québec's ministère du Développement durable, de l'Environnement et de la Lutte contre les changements climatiques held a joint allowance auction on February 19, 2020, for Current 2017 and 2020 Vintage and Advance 2023 Vintage allowances.
 - PG&E is authorized to procure GHG products through CARB Auctions and other CPUC-approved procurement processes and methods. PG&E provided information regarding its bilateral market procurement strategy to the PRG.
 - PG&E's procurement during the Quarter was consistent with PG&E's Conformed BPP GHG Procurement Plan filed in Advice Letter 5579-E, effective July 1, 2019.

All relevant GHG transactional information and supporting justification is included in Confidential Attachments E and L.

4. Explanation/justification of the timing of the transactions.

a) Electric Transactions

When selecting electric transactions, the best-priced bids/offers are selected first (merit-order selection) among those available for the required products at the time of the transaction, subject to credit and other limitations and operational constraints. Detailed explanation/justification for the timing of the transactions is included in Confidential Attachment J.

b) Natural Gas Transactions

For daily physical gas transactions, timing of execution is primarily driven by the requirement to match fuel usage by utility-owned and contracted electric

generating units and supply delivered on a daily and monthly basis, and by the availability of information impacting expectations for daily dispatch of these units. For transactions one month or longer, PG&E typically fills its forecast short gas positions in month-ahead, seasonal, or annual blocks, depending on the liquidity and prices available in each of these markets. Execution of term transactions was based on the PG&E Electric Portfolio Quarterly Position Update, presented to the PRG on March 17, 2020. Documentation supporting the timing of transactions is included in Confidential Attachment J.

5. Discussion of the system load requirements/conditions underlying the need for the Quarter's transactions.

a) PG&E Participation in the CAISO Markets

PG&E participates in the CAISO Day-Ahead and RTMs. PG&E's day-ahead planning and procurement incorporates weather-adjusted load forecasts, resource availability, price forecasts, dispatch costs and current bilateral electric market and forecasts of the CAISO's Integrated Forward Market (IFM) prices. The results of this process allow PG&E to determine the incremental costs of dispatchable resources that are bid into the IFM and the RTM. It also determines the price upon which PG&E is willing to pay the CAISO for meeting its hourly load. The CAISO then assures least cost dispatch by considering all resources simultaneously with all transmission constraints.

In the RTM, similar to the day-ahead market, PG&E submits resource bids and schedules into CAISO markets and those resources that clear the market will be obligated to operate in real time.

b) PG&E-Owned Generation Conditions During Q1 2020

PG&E received 42% percent of normal rainfall during the Quarter.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as system conditions and economics allowed. There was one planned outage at Helms Unit 2 for a generator rewind during the Quarter lasting longer than 72 hours. This

planned outage started in the previous Quarter and will continue into the next Quarter. There were no maintenance outage events at Helms lasting longer than 72 hours during the Quarter. There was one forced outage event at Helms Unit 3 longer 24 hours to repair loose brake ring components on the generator.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Balch 2 Units 2 and 3 (105 MW total), Belden (125 MW), Drum 1 Units 1, 2, 3 and 4 (54 MW total), James B Black Units 1 and 2 (172 MW total), Kings River (52 MW), Pit 4 Units 1 and 2 (95 MW total), Pit 7 Units 1 and 2 (112 MW total), Poe Units 1 and 2 (120 MW total), and Tiger Creek Units 1 and 2 (58 MW total). Three of the planned outages started in the previous Quarter and three outages will continue into the next Quarter. In addition, there were two maintenance outages lasting longer than 72 hours which included: Pit 1 Unit 1 (30.5 MW) and Salt Springs Unit 1 (11 MW). Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW during the Quarter were incurred at the following facilities: Bucks Creek Unit 2 (32 MW), Haas Units 1 and 2 (144 MW total), Pit 3 U1 (23.3 MW), Pit 5 U2 (40 MW), and Salt Springs Units 1 and 2 (44 MW total).

At PG&E's fossil combined cycle facilities there were no planned outages longer than 72 hours for the Quarter. There were no maintenance outages during the Quarter. There were no forced outages greater than 24 hours.

At PG&E's Humboldt Bay Generating Station there was one planned outage which included a planned outage extension on Unit 5 for an engine overhaul during the Quarter. There were three maintenance outages lasting longer than 72 hours during the Quarter on Unit 1, Unit 6, and Unit 9. There were no forced outage events at Humboldt Bay Generating Station lasting longer than 24 hours during the Quarter.

During First Quarter 2020, Diablo Canyon Power Plant Unit 1 operated at 101.1 percent capacity factor, maintaining continuous full power during all of first quarter.

During First Quarter 2020, Diablo Canyon Power Plant Unit 2 operated at 97.0 percent capacity factor. During February, Unit 2 experienced an unexpected controlled manual shutdown for 2.6 days due to misalignment of reactor control rods during planned periodic control rod operational testing. Otherwise, Unit 2 maintained full power during the remainder of first quarter. Discussion of how the Quarter's transactions meet the goals of the risk management strategy reflected in the Plan.

As described in Sections 3.b. and 3.d. above, during the Quarter, PG&E executed transactions in accordance with its Hedging Plan. A list of relevant information regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachments F and K.

6. Discussion of how the Quarter's transactions meet the goals of the risk management strategy reflected in the Plan.

As described in Sections 3.b. and 3.d. above, during the Quarter, PG&E executed transactions in accordance with its Hedging Plan. A list of relevant information regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachments F and K.

7. Copy of each contract.

A list of transactional contracts executed and/or modified by PG&E during the Quarter is included in Confidential Attachment H. Copies of the contracts PG&E seeks approval of through this QCR are also included in this attachment.

8. The valuation results for the contract(s) (for contracts of three months or greater duration).

PG&E provides the valuation method and results for the contracts filed via this QCR in Confidential Attachment H.

9. An electronic copy of any data or forecasts used to analyze the transactions.

Because transaction personnel are continuously monitoring a wide range of market information on a 24-hour-per-day, 7-day-per-week basis, it is not feasible to provide all

the data and forecasts used to analyze all potential and executed transactions. However, key analysis data utilized during the Quarter is in Confidential Attachment J.

10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.

To the extent any analyses requested by the Commission or PRG during the Quarter were not already included as a part of PG&E's response to Items 1 through 9 above, such additional analyses would be contained in Confidential Attachment F.

11. Any other information sought by the Commission under the Pub. Util. Code.

To the extent that the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) has requested information for the Quarter as identified in its MDR, this information will be included in PG&E's MDR response and submitted to the Cal Advocates 14 days after the filing of the QCR. In addition, the Commission's Energy Division has requested that PG&E provide transparent exchange traded prices. PG&E has included this information in Confidential Attachments A and E.

D. Additional Reporting Requirement Pursuant to D.07-01-039

As required by OP 12 of D.07-01-039, PG&E has included in Confidential Attachment I, investments in retained generation that were completed during the Quarter, as well as any multiple contracts of less than five years with the "same supplier, resource or facility" as required in D.07-01-039 on page 154. There were no transactions or investments to report during the Quarter.

E. Cost Allocation Mechanism (CAM)

For the Quarter, PG&E did not execute any contracts qualifying for CAM.

Attachment 2

Attachment G (Public Version)



PACIFIC GAS & ELECTRIC

Independent Evaluator Report 2020 Q2 through Balance of Year Resource Adequacy and Import Energy E-Solicitation

March 2020



PA Regional Office:
PA Consulting Group
US Bank Tower,
633 W 5th Street, 26th Floor
Los Angeles, CA 90071
USA
Tel: +1 213 689 1515
Fax: +1 213 486 4801
www.paconsulting.com

Version no: 1.0

Prepared by: C. Janecek

INDEPENDENT EVALUATOR REPORT

PA Consulting Group, Inc. (PA) served as the Independent Evaluator for the Pacific Gas and Electric Company (PG&E) 2020 Q2 through Balance of Year Resource Adequacy and Import Energy E-Solicitation (2020 Q2-BoY RA and Import Energy E-Solicitation or the E-Solicitation). This report provides a summary of PA's evaluation of the process from the drafting of the E-Solicitation documents through to the recommendation of selected bids and negotiations of contracts submitted to the California Public Utilities Commission (CPUC or Commission).

Overview of solicitation

PG&E issued its 2020 Q2-BoY RA and Import Energy E-Solicitation via an electronic Market Notice on January 6, 2020, with bids/offers due January 10, 2020.

In this E-Solicitation, PG&E sought offers for sale (i.e., **PG&E buys**), bids to purchase (i.e., **PG&E sells**), and offers for sale / bids to purchase (i.e., **simultaneous PG&E buys/PG&E sells**) of eligible Local and System RA and Import Allocation Rights (IAR) monthly products with April through December 2020 delivery periods; the Market Notice also stated that only same-month offers for sale / bids to purchase would be accepted. PG&E also sought offers for sale (i.e., **PG&E buys**) of WSPP Schedule C Import Energy (IE) for the August through October 2020 delivery periods.

In the Market Notice, PG&E noted that it was specifically interested in procuring capacity in the Kern and Stockton local capacity areas. PG&E did not specify the amounts of RA capacity it wished to purchase.

The Market Notice further noted that for the months of August through October, PG&E would **only** be accepting offers for sale and/or simultaneous offers for sale/bids to purchase RA; i.e., if a counterparty wished to bid for the purchase of RA in those months, it would only be able to do so via a simultaneous offer for sale and bid to purchase of RA. Subsequently, on January 9, in light of changes to outage schedules, PG&E updated the Market Notice to notify prospective participants that PG&E would be accepting bids for the purchase of RA from PG&E for the August through October delivery period.

Table 1 below summarizes the products sought in the E-Solicitation.

Table 1: Summary of Solicitation Products			
Product	PG&E Seeking to	Pricing	Delivery Period
Monthly System and Local RA	Buy or Sell	Flat price (\$/kW-month)	April through December 2020
Monthly Import Allocation Rights	Sell	Flat price (\$/kW-month)	April through December 2020
Monthly System and Local RA and IAR	Simultaneous Buy and Sell	Flat price (\$/kW-month)	April through December 2020
Monthly Import Energy	Buy	Premium/Discount (+/-) to Index or Fixed Price (\$/MWh)	September and October 2020

PG&E received [REDACTED] to the E-Solicitation and contracted for [REDACTED]. PG&E received [REDACTED] IAR [REDACTED] to the E-Solicitation and contracted for [REDACTED]. PG&E received [REDACTED] IE [REDACTED] to the E-Solicitation and contracted for [REDACTED].

Main Independent Evaluator activities during solicitation

PA's role in PG&E's 2020 Apr-BoY RA and Import Energy E-Solicitation spanned approximately five weeks in January and early February 2020. PA performed the role of Independent Evaluator and was involved from PG&E's development of the Market Notice materials through the submittal of the bids/offers and ultimately the negotiation of the RA, IAR, and IE confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in its E-Solicitation and provided fair and equitable treatment of all bids/offers. PA was in regular contact with PG&E staff throughout the process, addressing PG&E's questions, identifying and resolving potential issues, and providing recommendations throughout the process. The following provides a summary of PA's main activities during this solicitation:

- PA reviewed the E-Solicitation's Market Notice prior to PG&E's issuance and had no substantial comments or suggested edits to the Notice. PG&E has issued several Solicitations for RA, IAR, and IE in 2018 and 2019 and has developed a straightforward Market Notice template.
- PA received all communications between PG&E and bidders. PA directly received all of the emails, including bids/offers that were sent to and received from bidders.
- PA provided guidance related to PG&E's questions regarding a potential issue with a bids/offers submittal.
- PA reviewed the bids/offers received and discussed with the PG&E team the team's intent to shortlist the bids/offers.
- PA monitored negotiation calls and emails with all bidders.

- PA reviewed presentation materials related to the January 14th and January 17th, 2020 PRG meetings.
- PA reviewed the draft and executed confirmation documents related to the selected bids/offers.

Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices to PG&E's RA E-Solicitation distribution list as well as its IE distribution list. PG&E has conducted multiple RA and related solicitations in the last two years. In some Solicitations, PG&E has included additional outreach beyond the Market Notices, including telephone calls to potential bidders to ensure they were aware of the Solicitation. While PG&E did not conduct such additional outreach for this Solicitation, PA believes market participants are increasingly aware of PG&E's solicitations and that PG&E extended adequate outreach for the 2020 Apr-BoY RA and Import Energy E-Solicitation.

PG&E's Bid Evaluation Methodology

PG&E primarily relied on a quantitative evaluation of each bidder's proposed volumes of RA desired and the bidders' proposed price for each product. Had competing bidders made bids/offers for RA in the same month that exceeded PG&E's available RA or need for RA in that month, PG&E would have selected the higher priced bidder.

Further, there were numerous offers to sell RA which PG&E either manually accepted or rejected based on the following logic to evaluate:

[REDACTED]

PA found PG&E's bid/offer evaluation methodology appropriate for this E-Solicitation.

PG&E's Shortlisting and Negotiations of Confirms

The Market Notice for this E-Solicitation specified that PG&E would only contract for RA and IAR products with participants under an EEI Master Agreement. PG&E provided participants its Standard EEI RA Confirm and Import Allocation Rights Confirm. During the confirm negotiations, PG&E provided draft Confirms to each participant specific to their awarded price and volume. The Market Notice also specified that Import Energy offers should be for WSPP Schedule C firm energy.

As noted, PG&E received [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ultimately, PG&E contracted through this E-Solicitation [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2020 Apr-BoY RA and Import Energy E-Solicitation.

Some specific findings are noted below:

- PG&E in no way prevented PA from observing its process and analyzing its methods and did not interfere with PA's conducting the Independent Evaluation.
- PA finds that PG&E's outreach for this E-Solicitation was adequate and that the Market Notice materials were clear and concise related to the E-Solicitation.
- PA finds that PG&E appropriately [REDACTED]
[REDACTED]
[REDACTED]
- Based on our review of PG&E's analysis, our participation in calls and meetings and other IE activities, PA finds that PG&E conducted the 2020 Apr-BoY RA and Import Energy E-Solicitation fairly.



We are an employee-owned firm of over 2,500 people, operating globally from offices across North America, Europe, the Nordics, the Gulf and Asia Pacific.

We are experts in energy, financial services, life sciences and healthcare, manufacturing, government and public services, defence and security, telecommunications, transport and logistics.

Our deep industry knowledge together with skills in management consulting, technology and innovation allows us to challenge conventional thinking and deliver exceptional results with lasting impact.

Corporate headquarters
123 Buckingham Palace Road
London SW1W 9SR
United Kingdom
Tel: +44 20 7730 9000

paconsulting.com

This document has been prepared by PA on the basis of information supplied by the client and that which is available in the public domain. No representation or warranty is given as to the achievement or reasonableness of future projections or the assumptions underlying them, management targets, valuation, opinions, prospects or returns, if any. Except where otherwise indicated, the document speaks as at the date hereof.

© PA Knowledge Limited 2014.
All rights reserved.

This document is confidential to the organisation named herein and may not be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying or otherwise without the written permission of PA Consulting Group. In the event that you receive this document in error, you should return it to PA Consulting Group, 123 Buckingham Palace Road, London SW1W 9SR. PA accepts no liability whatsoever should an unauthorised recipient of this document act on its contents.

Attachment 3

Attachment H (Public Version)

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q1 2020**

New Contracts Executed and Amended During the Quarter

The table below provides a summary of Request for Offer (RFO) and Competitive Solicitation contracts executed during this Quarter and filed for CPUC approval via this Procurement Transaction Quarterly Compliance Report (QCR) advice letter. A copy of the contract(s) is included.

Workpapers providing the method for valuation results calculations are included in Confidential Attachment L - Reasonable Number of Analyses Models, Description of Models, and How Models Operate.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
None for the Quarter								

The table below provides a summary of e-solicitation and/or Market RFP contracts executed through competitive processes during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Peninsula Clean Energy Authority (33B232S05)	1/24/2020	Local RA (Sale)			2.5 MW 10 MW 3.25 MW			Q1 2020 E- Solicitation

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q1 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Peninsula Clean Energy Authority (33B232S06)	1/24/2020	Local RA (Purchase)		[REDACTED]	2.5 MW	[REDACTED]	[REDACTED]	Q1 2020 E- Solicitation
		System RA (Purchase)	N/A		10 MW 3.25 MW			
City of San Jose (San Jose Clean Energy) (33B247S03)	1/28/2020	Local RA (Sale)			14.67 MW 6 MW			Q1 2020 E- Solicitation
City of San Jose (San Jose Clean Energy) (33B247S04)	1/28/2020	System RA (Purchase)	N/A		20.67 MW			Q1 2020 E- Solicitation
CCSF, acting by and thru its PUC, CleanPowerSF (33B243S03)	1/28/2020	System RA (Sale)	N/A		9.16 MW			Q1 2020 E- Solicitation
Clean Power Alliance of Southern California (33B240S04)	1/28/2020	System RA (Sale)	N/A		52.29 MW			Q1 2020 E- Solicitation
East Bay Community Energy Authority (33B238S05)	1/28/2020	Local RA (Sale)			65 MW 74 MW 76 MW 57 MW			Q1 2020 E- Solicitation
East Bay Community Energy Authority (33B238S07)	1/28/2020	Import Allocation Rights (Sale)	N/A		0.98 MW 31.98 MW			Q1 2020 E- Solicitation
Monterey Bay Community Power Authority (33B236S01)	1/28/2020	Local RA (Sale)			7.5 MW			Q1 2020 E- Solicitation
Monterey Bay Community Power Authority (33B236S02)	1/28/2020	System RA (Purchase)	N/A		7.5 MW			Q1 2020 E- Solicitation
East Bay Community Energy Authority (33B238S06)	1/29/2020	System RA (Purchase)	N/A		65 MW 74 MW 76 MW 57 MW			Q1 2020 E- Solicitation

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q1 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
NextEra Energy Marketing, LLC (33B037S01)	1/31/2020	Local RA (Sale)			8 MW			Q1 2020 E- Solicitation
		Local, Flexible RA (Sale)			8 MW			
Silicon Valley Clean Energy Authority (33B230S06)	2/19/2020	Local RA (Purchase)			1 MW			Q1 2020 Market RFP
Peninsula Clean Energy Authority (33B232S07)	3/23/2020	System RA (Purchase)			72MW			Q1 2020 Market RFP

The table below provides a summary of bilateral contracts (including GHG offsets transactions facilitated by brokers), and significant exchange-placed trades, (including RA transactions facilitated by brokers) executed during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Marin Clean Energy (33B235S09)	1/10/2020	Local RA (Purchase)			4.5 MW			Q1 2020 Bilateral
Silicon Valley Clean Energy Authority (33B230S04)	1/13/2020	Local RA (Purchase)			8 MW 2 MW 7 MW 3 MW 1 MW			Q1 2020 Bilateral
		System RA (Purchase)	N/A		9.8 MW 10.2 MW			

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q1 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Silicon Valley Clean Energy Authority (33B230S05)	1/13/2020	Local RA (Sale)			10.8 MW 10.2 MW			Q1 2020 Bilateral
		System RA (Sale)	N/A		8 MW 3 MW			
Shell Energy North America (US), L.P. (33B022S05)	2/5/2020	Local RA (Sale)			1.03 MW			Q1 2020 Bilateral
Clean Power Alliance of Southern California (33B240S05)	3/9/2020	Import Allocation Rights (Sale)	N/A		22 MW 85 MW			Q1 2020 Bilateral

Informational purposes only: A summary of QF contracts executed and/or amended during the Quarter filed via separate application, advice letter or other approval mechanisms:

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Deadwood Creek (12H010QPA)	2/27/2020	PURPA	1 year	Contract	N/A	Advice Letter Filing Pending

Informational purposes only: A summary of the contracts executed and/or amended during the Quarter (non-QF) filed via separate application, advice letter or other approval mechanisms:

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Marsh Landing (33B093)	2/4/2020	Tolling	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRA Compliance

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q1 2020

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Collins Pine Company (33R481BIO)	2/6/2020	BioMAT	20 years	Contract	N/A	2020 ERRA Compliance Filing
Silicon Valley Clean Energy Authority (33R482)	2/7/2020	RPS Energy REC Sales	1 year	Contract	3/23/2020	Advice Letter Filing 5789-E
Hummingbird Energy Storage, LLC (40S014)	2/21/2020	Energy Storage	N/A	Consent to Assignment - Financing	N/A	2020 ERRA Compliance
Clean Power Alliance of Southern California (33B240S05)	3/24/2020	RA	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRA Compliance
Morgan Stanley Capital Group Inc. (33B252)	3/26/2020	EEI Master	N/A	Contract	N/A	2020 ERRA Compliance
Morgan Stanley (S&F for Vantage Wind) (33R083TR02)	3/26/2020	Shape & Firm	5 years	Contract	4/17/2020	Advice Letter Filing 5809-E

Informational purposes only: A summary of the contracts terminated/expired during the

Quarter:

Contract/ Counterparty Name	Termination or Expiration ¹	Date	Product	Volume (MW)
Avalon Dairy Digester (33R468BIO)	Termination	1/4/2020	BioMAT	1.018
Deadwood Creek (12H010)	Expiration	1/28/2020	QF	2
Fresno Cogeneration Partners, L.P. (25C092)	Expiration	2/9/2020	QF	33
Snow Mountain Hydro (Cove) (13H013)	Expiration	2/19/2020	QF	5
Snow Mountain Hydro (Ponderosa Bailey Creek) (13H035)	Expiration	2/24/2020	QF	1.1

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q1 2020**

Contract/ Counterparty Name	Termination or Expiration¹	Date	Product	Volume (MW)
Woodland Biomass Power (33R075)	Expiration	2/29/2020	RPS	25
Snow Mountain Hydro (Burney Creek) (13H016)	Expiration	3/27/2020	QF	3

¹ A terminated contract is ended before its original expiration date. An expiration date is the natural end of the contract.

Attachment 4

Confidentiality Declarations and Matrix

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5815-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q1 2020
APRIL 30, 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			
Attachment E: Q1 2020 GHG Materials folder File name: 07_PRG Q1-2020 GHG Position Update.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
Attachment F: Confid Attchment F Qtr01 2020 zip folder 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

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			
Attachment A – Physical and Financial Electric Transactions	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 years
Attachment A – Physical and Financial Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E’s long term buying and hedging strategies. With the entire set of transactions PG&E’s counterparties could reconstruct PG&E’s gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

Attachment B – in its entirety: Counterparty Information, including non- investment grade counterparties table: List of Non-Investment Grade Counterparties (Electric and Natural Gas Transactions)	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 advantage by the disclosure of counterparty information. This information could be used by other market participants to gain a commercial advantage.	3 Years
Attachment C – in its entirety: Electric Transactions	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings) Item XIII) Energy Division Monthly Data Request (AB 57)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years. This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years 3 Years

Attachment D – in its entirety: Natural Gas Transactions	<p>Item I) A) 4) Long-term fuel (gas) buying and hedging plans</p> <p>Item I) B) 2) Utility recorded gas procurement and cost information</p> <p>XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)</p>	<p>Each financial transaction is a factor in PG&E’s long term buying and hedging strategies. With the entire set of transactions PG&E’s counterparties could reconstruct PG&E’s gas buying and hedging plans.</p> <p>Actual quantity and cost of procured physical gas are protected.</p> <p>These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation</p>	<p>Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)</p> <p>Utility recorded physical gas procurement and cost information is confidential for one year.</p> <p>Monthly procurement costs (ERRA Filings) are confidential for 3 years.</p>
Attachment E – in its entirety: Other Transactions (Electric Information) (Except Greenhouse Gas (“GHG”) Information, which is presented separately below)	<p>Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)</p> <p>Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;</p> <p>Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids</p>	<p>Disclosure of information in these executed contracts could provide market participants regarding PG&E’s net open position.</p> <p>Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E’s customers.</p>	<p>3 Years</p> <p>3 Years</p>
Attachment E – in its entirety: Other Transactions- (GHG Information)	<p>D.14-10-033</p> <p>Public Utilities Code Section 454.5(g)</p>	<p>This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>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.</p>	<p>Indefinite</p>

Attachment F – in its entirety: PRG Material	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 advantage 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)
Attachment F – in its entirety: PRG Material- GHG Information	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
Attachment G - Independent Evaluator (IE) Report	<p>Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)</p> <p>Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids</p>	<p>Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.</p> <p>Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.</p>	<p>3 Years</p> <p>3 Years</p>
Attachment H - Executed Contracts	<p>Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)</p> <p>Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;</p> <p>Item VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation</p>	<p>Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.</p> <p>Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.</p>	<p>3 Years</p> <p>3 Years</p>

	of participating bids		
Attachment J – System Conditions	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	Residual net short/long is key input to PG&E’s confidential forecast of net open position. The residual net short/long is information provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Public Utilities Code Section 454.5(g)	In addition, this attachment contains market sensitive information and addresses PG&E’s energy procurement trading strategies.	Indefinite
Attachment J - Gas Transaction, Natural Gas Documents	Item I) A) 3) Gas Demand Forecasts and 4) Long-term fuel (gas) buying and hedging plans	This information includes detailed information on PG&E’s implementation of its fuel buying and hedging plans and must remain confidential to avoid disclosing PG&E’s market strategy.	Physical gas information is confidential for 3 Years; Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
Attachment K – Risk Management	Item XII – Monthly Portfolio Risk Assessment of Appendix 1 of D.06-06-066 for three years.	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.	3 years
	Public Utilities Code 454.5(g)	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.	Indefinite
Attachment L – In its entirety: Reasonable Number of Analyses	Item I) A) 4) Long-term fuel (gas) buying and hedging plans,	This information includes detailed information on PG&E’s hedging plan, and must remain confidential to avoid disclosing PG&E’s market strategy.	Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Public Utilities Code 454.5(g)	Information concerning a description of PG&E’s long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E’s customers and put PG&E at an unfair business advantage if publicly disclosed.	Indefinite

Attachment L - Reasonable Number of Analyses – Electric	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve details which would reveal PG&E’s position in the market place.	3 Years
	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E’s customers.	3 Years
	VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids		
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XI) Monthly Procurement Costs (Energy Resource Recover Accounts [ERRA] Filings) D-14-10-033	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations	Monthly procurement costs (ERRA Filings) are confidential for 3 years Indefinite
Attachment M – Executed Contracts	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E’s customers.	3 Years

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

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

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN
CONFIDENTIAL ATTACHMENTS A, B, C, E, G, H, J, L, AND M**

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 April 30, 2020 Advice Letter 5815-E, Confidential Attachments A, B, C, E, G, H, J, L and M.
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, 14-10-033 and/or Public Utilities Code Section 454.5(g). 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 in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on April 30, 2020, at San Francisco, California.

_____/s/_____
Marianne Aikawa

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

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

**DECLARATION OF JAY BUKOWSKI
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S
CONFIDENTIAL ATTACHMENTS F AND K**

I, Jay Bukowski, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since October 1998. My current title is Manager within PG&E's Energy Policy and Procurement organization. In this position, my responsibilities include review of regulatory reports and managing PG&E's Procurement Review Group and Independent Evaluator program. 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 April 30, 2020 Advice Letter 5815-E, Confidential Attachments F and K.
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, 14-10-033, and/or Public Utilities Code Section 454.5(g). 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 in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on April 30, 2020, at San Francisco, California.

/s/
Jay Bukowski

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

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

**DECLARATION OF JOHN ULLOA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND INFORMATION
CONTAINED IN CONFIDENTIAL ATTACHMENTS A, B, D, J AND L**

I, John Ulloa, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E") and have been an employee since 1998. My current title is Manager, Electric Gas Supply in the Electric and Gas Acquisition Department, which is part of the Energy Policy and Procurement organization. I am responsible for physical and financial trading of gas in support of PG&E's utility-owned generation plants and PG&E's tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved. 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 April 30, 2020 Advice Letter 5815-E, Confidential Attachments A, B, D, J, and L.
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, 14-10-033 and Public Utilities Code Section 454.5(g). 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 in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on April 30, 2020, at San Francisco, California.

/s/

John Ulloa

**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	