

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



September 21, 2021

Advice Letter 5837-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: Reports of Possible Off Ramps.

Dear Mr. Jacobson:

Advice Letter 5837-E is effective as of June 24, 2021, per resolution WSD-014 ordering paragraphs.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

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

June 1, 2020

Advice 5837-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Reports of Possible Off Ramps

Purpose

This Tier 3 Advice Letter is being submitted in compliance with the Guidance Decision on 2019 Wildfire Mitigation Plans Submitted Pursuant to Senate Bill 901, Decision 19-05-036 (Decision), Ordering Paragraph (OP) 1 to describe “any concerns about the effectiveness of any program” in Pacific Gas and Electric Company’s (PG&E”) Wildfire Mitigation Plan (WMP).¹ This is PG&E’s second Report on Possible Off Ramps.

Background

The Decision provides that within six months and twelve months of its effective date, the “electrical corporations named as respondents shall file [a] Tier 3 Advice Letter entitled ‘Reports on Possible Off Ramps,’ describing any concerns about the effectiveness of any program of their individual Wildfire Mitigation Plans.”² The “report shall clearly describe the concern, contain a specific proposal for action, including if applicable a recommendation to reduce or end the specific mitigation identified, and include any expert or other authoritative information available on the efficacy of the mitigation.”³

PG&E submitted its first Report on Possible Offramps on December 2, 2019, in which we reported that no concerns regarding the effectiveness of our programs had been identified. In the Commission Decision 20-03-004 for Phase 2 of Rulemaking 18-10-007, the Commission approved with limitations PG&E’s first Report on Possible Off Ramps⁴.

¹ Decision, OP 1.

² *Id.*

³ *Id.*

⁴ D.20-03-004, Ordering Paragraph 23

Impacts of COVID-19

PG&E takes seriously the threat of the novel coronavirus (COVID-19) pandemic and is taking measures to protect the health and safety of our customers and our workforce while continuing to provide safe and reliable service and execute on our WMP initiatives. We are also closely monitoring the impact of COVID-19 on our suppliers and third-party vendors to the extent it is affecting them being able to deliver the required equipment and services planned for in our WMP. While these impacts do not necessarily inform the effectiveness of our WMP initiatives, it has altered the specific approaches, formats and timing of a number of business activities, including WMP initiatives, to date. A prime example is PG&E's 2020 Customer Outreach and Awareness Campaign. PG&E initially planned to hold in-person open houses in communities within its service territory that are located in High Fire Threat District (HFTD) areas. Due to the current pandemic, PG&E has altered its open house format from in-person to online webinars to enable continued community outreach while keeping our customers and community safe during the current pandemic. Similarly, since the filing of the 2020 WMP in February PG&E has created multiple deployment strategies for Community Resource Centers (CRCs) during PSPS events, including permanent structures, temporary facilities, open-air tents or vehicle-based mobile CRCs, that can be leveraged depending on the circumstances, including COVID-conditions, in the PSPS-impacted community.

PG&E remains committed to delivering on its essential work to reduce wildfire risk and will continue to adjust its execution strategy to appropriately balance the safety considerations of our customers and communities in response to COVID-19 and the 2020 wildfire season. Draft Resolution WSD-002 contemplates that execution challenges could arise as a result of the current pandemic and requires the utilities to file a report within 60 days of the Resolution being approved by the Commission on the impacts of COVID-19 on the work being performed in the 2020 WMPs. PG&E will provide further detail on the impacts of COVID-19 in that report.

Concerns with Effectiveness of Programs

PG&E has not identified concerns about the effectiveness of the programs in its 2020 WMP, which Draft Resolutions WSD-002 and WSD-003 have proposed conditional approval and will be considered at the June 11, 2020 Commission meeting. While PG&E's 2020 WMP has updated and superseded the 2019 WMP, PG&E has also not identified concerns about the effectiveness of the programs identified in its approved 2019 WMP.

Resolution

PG&E is filing this Tier 3 Advice Letter in compliance with the Decision. However, PG&E does not have concerns with the effectiveness of any programs outlined in its 2020 or 2019 WMPs and has not raised any such concerns in this Tier 3 Advice Letter.

Therefore, PG&E would be amenable if the Commission disposes of this Tier 3 Advice Letter accordingly.

Protests

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

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than June 22, 2020, which is 21 days⁵ 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

⁵ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.3, this advice letter is submitted with a Tier 3 designation. PG&E requests that this Tier 3 advice submittal become effective upon Commission approval.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.18-10-007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List R.18-10-007



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID 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) #: 5837-E

Tier Designation: 3

Subject of AL: Reports of Possible Off Ramps

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other: Every 6 Months

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-05-036

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

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:

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Redwood Coast Energy Authority
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
Alta Power Group, LLC	Energy Management Service	SCD Energy Solutions
Anderson & Poole	Engineers and Scientists of California	
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
Cameron-Daniel, P.C.	Kelly Group	Spark Energy
Casner, Steve	Ken Bohn Consulting	Sun Light & Power
Cenergy Power	Keyes & Fox LLP	Sunshine Design
Center for Biological Diversity	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Chevron Pipeline and Power	Los Angeles County Integrated	TerraVerde Renewable Partners
City of Palo Alto	Waste Management Task Force	Tiger Natural Gas, Inc.
City of San Jose	MRW & Associates	TransCanada
Clean Power Research	Manatt Phelps Phillips	Troutman Sanders LLP
Coast Economic Consulting	Marin Energy Authority	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Water and Energy Consulting Wellhead
Crown Road Energy, LLC	NLine Energy, Inc.	Electric Company
Davis Wright Tremaine LLP	NRG Solar	Western Manufactured Housing
Day Carter Murphy	Office of Ratepayer Advocates	Communities Association (WMA)
Dept of General Services	OnGrid Solar	Yep Energy
Don Pickett & Associates, Inc.	Pacific Gas and Electric Company	
Douglass & Liddell	Peninsula Clean Energy	