

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 21, 2020

PG&E Advice Letter 5883-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Via email to Erik.Jacobson@pge.com

RE: PG&E Advice Letter 5883-E Implementation of Microgrids Memorandum Account in Compliance with Decision 20-06-017

Dear Mr. Jacobson,

Energy Division has reviewed Pacific Gas and Electric Company (PG&E) Advice Letter 5883-E and approves it with an effective date of December 18, 2020.

PG&E Advice Letter (AL) 5883-E requests authorization to establish a Microgrids Memorandum Account (MGMA) as directed by D.20-06-017 Ordering Paragraph (OP) 12, 14, and 16. The AL was timely filed on July 17, 2020. PG&E seeks authority to modify the Electric Preliminary Statement to create a new memorandum account to track costs associated with the PG&E Make-Ready Program, Temporary Generation Program and Community Microgrid Enablement Program (CMEP).

Commission Decision D.20-06-017 was issued consistent with the Commission's goal of deploying resiliency planning in areas that are prone to outage events and wildfires, with the target of establishing key microgrid and resiliency strategies as soon as possible. Moreover, during March 2020, the Executive Director requested PG&E to begin making make all necessary and proper preparations in advance of 2020 fire season as PG&E was assessing its readiness to be responsive to planned outages such as public safety power shutoffs.¹

The Executive Director's letter was served to the R.19-09-009 Service List on March 11, 2020. No party opposed the Executive Director's guidance. That guidance included the reminder that PG&E may use memorandum accounts to track incremental costs incurred that are not otherwise recovered in PG&E's adopted revenue requirements. The proposed decision (PD) issued April 29, 2020 instructed PG&E to track the program costs within the Fire Risk Mitigation Memorandum Account

¹ [3.9.2020 PGE R19.09.009.pdf \(ca.gov\)](#) Letter from CPUC Executive Director to PG&E Senior Vice President, dated March 9, 2020.

(FRMMA). The Commission received comments to the PD on this topic from the Public Advocates Office (PAO), PG&E, and the Small Business Utility Advocates (SBUA). SBUA did not object to the use of the memorandum account. PAO objected to recording CMEP expenditures in the FRMMA, advocating instead that CMEP expenditures should be tracked in a newly created Microgrids Memorandum Account to ensure appropriate visibility and review.²

The final Decision mandated PG&E to modify its Preliminary Statement to create a new microgrids memorandum account. Pending disposition of this Advice Letter, Staff understands that PG&E has been tracking 2020 expenditures incurred by its Make-Ready Program, Temporary Generation Program, and Community Microgrid Enablement Program within an already existing memorandum account -- the Fire Risk Mitigation Memorandum Account. The FRMMA can be used to record incremental costs of fire risk mitigation work that is not otherwise recovered in PG&E's adopted revenue requirements, including but not limited to expense and capital expenditures for resiliency and enhanced event response capacity. Staff agrees that this method of tracking interim expenditures accrued during 2020 for the aforementioned programs is appropriate under these circumstances regarding 2020 fire season preparation and response.

PG&E additionally included program descriptions for its Make-Ready, Temporary Generation, and Community Microgrid Enablement Programs in its 2020 Wildfire Mitigation Plan, which had been filed and served on February 6, 2020. Under the Wildfire Mitigation Plan, eligible expenditures could be tracked within the Wildfire Mitigation Plan Memorandum Account (WMPMA). However, the Preliminary Statement for the WMPMA restricts expenditures to incremental costs incurred to implement an approved wildfire mitigation plan that are not otherwise recovered in PG&E's adopted revenue requirements. During calendar year 2020, there was a period when these programs were under deliberation by the Commission and had not yet become fully authorized. Staff finds it reasonable for PG&E to use the FRMMA to track 2020 costs given that the aforementioned programs, had been newly conceived during January 2020, and the Preliminary Statement for WMPMA limits tracking of costs to those within an approved wildfire mitigation plan.

Upon the approved disposition of this Advice Letter, PG&E may transfer the 2020 costs presently being tracked in its FRMMA for its Make-Ready Program, Temporary Generation Program, and CMEP Program into the newly created Microgrids Memorandum Account. Doing so, will ensure that these three programs receive the appropriate visibility and review envisioned by the PAO in its comments to the PD.

Additionally, the AL states that PG&E intends as a last resort option to assist some customers by providing back up power supply connected behind the meter in certain circumstances of emergency outage, such as during public safety power shutoffs. Consequently, PG&E proposes to create an additional subaccount to track offsetting costs in the event that PG&E seeks reimbursement from specific customers.

Energy Division received one Protest dated August 6, 2020. It was timely filed by the Counties of Kern, Marin, Mendocino, Napa, Nevada, San Luis Obispo, Santa Barbara, and Sonoma, and the City of Santa Rosa (the Joint Local Governments). In its Protest, the Joint Local Governments request

² OPENING COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON THE PROPOSED DECISION ADOPTING SHORT-TERM ACTIONS TO ACCELERATE MICROGRID DEPLOYMENT AND RELATED RESILIENCY SOLUTIONS, filed 5/19/2020 at p. 8-9.

the Commission to require PG&E to delete the reimbursement language prior to approving the memorandum account creation.

The Protest of the Joint Local Governments is rejected because a utility has authority to deviate from its tariffs under specific circumstances including those stated in General Order 96-B, section 9.2.3, "Emergency Service, Service to Governmental Agencies." Additionally, the establishment of a memorandum account does not guarantee that a utility will be authorized rate recovery. The open proceeding, R.19-09-009 already has provided for a reasonableness review for the costs of the PG&E Temporary Generation Program. Specifically, D.20-06-017 requires that the reasonableness of PG&E actions will be assessed in an appropriate proceeding, or in a future track of R.19-09-009, as stated in OP 12, 14, and 16.

Commission Decision D.20-06-017 directed PG&E to create this new memo account, and PG&E is not yet requesting rate recovery for the amounts in the Memorandum account.

Therefore, the Advice Letter is approved with the effective date of December 18, 2020 in accordance with General Order 96-B Rule 7.3.4(2).

Sincerely,

Handwritten signature of Edward Randolph in cursive, with the initials "(for)" written below it.

Edward Randolph
Deputy Executive Director for Energy and Climate Policy / Director, Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

CC: Megan Somogyi; (MSomogyi@goodinmacbride.com)
Wendy Pena; (WPena@goodinmacbride.com)
Igor Grinberg; (igor.grinberg@pge.com)
Annie Ho; (amhp@pge.com)
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Merideth Sterkel; (merideth.sterkel@cpuc.ca.gov)
Forest Kaser; (forest.kaser@cpuc.ca.gov)
PG&E Tariffs Unit; (pgetariffs@pge.com)
Energy Division Tariff Unit (edtariffunit@cpuc.ca.gov)
Advice Letter Service List
R.19-09-009 Service List

July 17, 2020

Advice 5883-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Implementation of Microgrids Memorandum Account in Compliance with Decision 20-06-017

I. Purpose

Pacific Gas and Electric Company ("PG&E") hereby submits this Tier 2 Advice Letter ("AL") in compliance with California Public Utilities Commission ("CPUC" or "Commission") Decision ("D.") 20-06-017 ("Decision") Ordering Paragraphs ("OPs") 12, 14 and 16 to establish the Microgrids Memorandum Account ("MGMA").

II. Background

The Commission initiated Rulemaking ("R.") 19-09-009 to develop a policy framework surrounding the commercialization of microgrids and related resiliency strategies and to implement Senate Bill (SB) 1339 (Stern, 2018).

On December 20, 2019 the assigned Commissioner's Scoping Memo and Ruling was issued, adopting a scope and schedule for Track 1 of the proceeding. Track 1 addressed deploying resiliency planning in areas that are prone to outage events and wildfires, and invited utility proposals to be submitted for consideration. Subsequently, on January 21, 2020, PG&E submitted a proposal seeking approval for the following three programs:

- Make-Ready Program – Prepare substations to accept temporary or permanent generation and provide power safely;
- Temporary Generation Program – Energize microgrids and/or critical facilities with temporary mobile generators; and
- Community Microgrid Enablement Program (CMEP) – Partner with local communities to identify and build multi-customer microgrids serving critical facilities.

On June 17, 2020, the Commission issued D.20-06-017, which approves PG&E's Make-Ready Program, Temporary Generation Program, and CMEP.

This Advice Letter addresses the requirements included in OPs 12, 14 and 16 of D.20-06-017, which requires PG&E to file a Tier 2 advice letter by no later than July 17, 2020, that modifies the electric preliminary statement to establish a new MGMA to track costs associated with this decision's approval of the Make-Ready Program, Temporary Generation Program, and CMEP.

III. Discussion

Consistent with D.20-06-017, PG&E is submitting a new preliminary statement to implement the MGMA as required by the Decision. Electric Preliminary Statement Part IG, Microgrids Memorandum Account will track and record incremental expenses and capital related costs associated with the programs approved by the Commission in D.20-06-017. The MGMA will have three subaccounts:

1. The Make-Ready Program subaccount will track incremental expenses and capital related costs related to making infrastructure upgrades to its distribution system in order to enable substations to create microgrids using local sources of generation;
2. The Temporary Generation subaccount will track incremental expenses¹ related to the reservation and use of temporary mobile generation to reduce the impacts of Public Safety Power Shutoffs (PSPS). PG&E will credit this subaccount for any reimbursements received from customers for the provision of temporary mobile generation that is placed behind-the-meter at the customer's facility as part of PG&E's temporary generation program. The next section describes PG&E's reimbursement policy for providing backup power support to certain customers during a PSPS event; and
3. The CMEP subaccount will track incremental expenses and capital related costs to provide eligible community microgrid projects sponsored by local governments with enhanced utility technical support, microgrid information and project tools, and one-time matching funds to offset special facilities or Work Requested by Other costs. The details of the CMEP are subject to review and approval through a subsequent advice letter.

¹ PG&E's accounting policies will be applied to the costs recorded to the MGMA Temporary Generation Subaccount to determine expense or capitalization treatment. These policies apply to property, plant, and equipment as well as computer software. Lifespan, inclusion in the Retirement Unit Catalog, and exceeding a minimum material cost per unit, are among the main determining factors. However, some situations are very specific and require additional analysis and judgement in determining the cost categorization. PG&E has included in its preliminary statement accounting procedures to allow both expense and capitalized costs to be recorded into the MGMA Temporary Generation Subaccount in the event that these costs are incurred in order to implement D.20-06-017.

Per D.20-06-017, disposition of the balances in the Make-Ready Program subaccount and the Temporary Generation Program subaccount will be addressed in an upcoming track of the Microgrids and Resilience Strategies rulemaking (R.19-09-009). Disposition of the balance in the CMEP subaccount will be addressed in a separate application or in a future General Rate Case. Upon review and approval by the California Public Utilities Commission (CPUC or The Commission), PG&E will transfer the MGMA balances to the appropriate electric balancing account, as may be directed by the Commission, for recovery in rates. The proposed new preliminary statement to implement the MGMA is included in Attachment 1.

IV. Reimbursement for Backup Power Support for Critical Facilities

Pursuant to PG&E's Backup Power Supply Policy, PG&E may agree to provide mobile power generators through arrangements with external contractors for deployment at customer sites, as designated by PG&E, to provide short-term power supply during PSPS events. In such cases, PG&E will endeavor to provide back-up power support where it is operationally feasible and safe to do so in accordance with PG&E's policies and operating standards and solely in PG&E's discretion. Mobile generator deployments are subject to availability of resources and are prioritized based on public safety and criticality.

Where PG&E agrees to deploy mobile generators behind a customer's meter pursuant to this policy, PG&E will seek cost reimbursement from the customer in some cases. Because energization of certain facilities are in the public interest to mitigate the potential for broad impacts to public safety or societal continuity that may otherwise arise as a result of a PSPS, PG&E will not seek reimbursement from the following categories of customers: Intensive Care Unit (ICU) Hospitals identified by the California Hospital Association (CHA) and Hospital Council of Northern and Central California (HC); Pandemic Response (PR-1) sites classified as medical stations and shelters; and vote tabulations centers (during October-December months only).

For any other deployments of mobile generation behind a customer's meter, PG&E will seek reimbursement of costs associated with that deployment from the customer if the customer is legally obligated to have its own back-up power supply to maintain energization of all or a portion of its facility for any period of time during grid outages. Where PG&E seeks reimbursement, it will require that the customer reimburse PG&E for all charges invoiced by PG&E's external contractor and incurred by PG&E associated with the deployment of the back-up generation to that customer's premises, excluding any fixed reservation cost that PG&E incurs that is not specific to the deployment to that customer.

Any deployment of mobile generators for connection to PG&E-owned infrastructure, in front of customer meters, will provide electric service to one or more customers under existing tariff terms and conditions, and PG&E will not seek to recover costs from

individual customers for the backup power support in excess of the normal tariffed rates for those customers.

To the extent that PG&E is reimbursed costs pursuant to this policy, it will record those reimbursements as offsetting revenues in the Temporary Generation subaccount of the MGMA.

V. Tariff Revisions

Add Electric Preliminary Statement Part IG, *Microgrids Memorandum Account*, to record incremental electric capital costs and expenses related to the Make-Ready Program, Temporary Generation Program, and CMEP approved by D.20-06-017.

CPUC approval of this submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

VI. 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*****

Any party wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 6 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).

VII. Effective Date

PG&E requests that this Tier 2 advice submittal become effective as of January 1, 2020, which is approximately when PG&E began incurring costs for the Make-Ready Program and Temporary Generation Program.

VIII. 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 R.19-09-009. 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 Lists R.19-09-009

Attachment



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5883-E

Tier Designation: 2

Subject of AL: Implementation of Microgrids Memorandum Account in Compliance with Decision 20-06-017

Keywords (choose from CPUC listing): Compliance,

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.20-06-017

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: 1/1/20

No. of tariff sheets: 5

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: Electric Preliminary Statement IG

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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
46851-E	ELECTRIC PRELIMINARY STATEMENT PART IG MICROGRIDS MEMORANDUM ACCOUNT (MGMA) Sheet 1	
46852-E	ELECTRIC PRELIMINARY STATEMENT PART IG MICROGRIDS MEMORANDUM ACCOUNT (MGMA) Sheet 2	
46853-E	ELECTRIC PRELIMINARY STATEMENT PART IG MICROGRIDS MEMORANDUM ACCOUNT (MGMA) Sheet 3	
46854-E	ELECTRIC TABLE OF CONTENTS Sheet 1	46826-E
46855-E	ELECTRIC TABLE OF CONTENTS Sheet 17	46682-E



**ELECTRIC PRELIMINARY STATEMENT PART IG
MICROGRIDS MEMORANDUM ACCOUNT (MGMA)**

Sheet 2

(N)
(N)

5. ACCOUNTING PROCEDURE: (Cont'd)

(N)

- 4) An debit or credit entry equal to the interest on the average of the balance in the account at the beginning of the month and the balance in the account after the above entries, at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

b. Temporary Generation subaccount

The following entries will be made to this subaccount at the end of each month, or as applicable, as follows:

- 5) A debit entry equal to the expense incurred related to implementation of the Temporary Generation, net of any reimbursements, if applicable
- 6) If applicable, a debit or credit entry equal to the revenue requirement based on the recorded capital costs associated with the implementation of the Temporary Generation Program. Capital revenue requirements include depreciation expense, return on investment, federal and state taxes, and property taxes associated with costs of installed equipment.¹
- 7) A debit or credit entry to transfer all or a portion of the balance in this subaccount, to other adjustment clauses for future rate recovery, as may be approved by the CPUC.
- 8) An debit entry equal to the interest on the average of the balance in the account at the beginning of the month and the balance in the account after the above entries, at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(N)

¹ PG&E's accounting policies will be applied to the costs recorded to the MGMA Temporary Generation Subaccount to determine expense or capitalization treatment. These policies apply to property, plant, and equipment as well as computer software. Lifespan, inclusion in the Retirement Unit Catalog, and exceeding a minimum material cost per unit, are among the main determining factors. However, some situations are very specific and require additional analysis and judgement in determining the cost categorization. PG&E has included in its preliminary statement accounting procedures to allow both expense and capitalized costs to be recorded into the MGMA Temporary Generation Subaccount in the event that these costs are incurred in order to implement D.20-06-017.

(N)

(N)

(Continued)

Advice 5883-E
Decision 20-06-017

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

July 17, 2020



**ELECTRIC PRELIMINARY STATEMENT PART IG
MICROGRIDS MEMORANDUM ACCOUNT (MGMA)**

Sheet 3

(N)
(N)

5. ACCOUNTING PROCEDURE: (Cont'd)

(N)

c. CMEP subaccount

The following entries will be made to this subaccount at the end of each month, or as applicable, as follows:

- 9) A debit entry equal to the expense incurred related to implementation of the CMEP.
- 10) A debit or credit entry equal to the revenue requirement based on the recorded capital costs associated with the implementation of the CMEP. Capital revenue requirements include depreciation expense, return on investment, federal and state taxes, and property taxes associated with costs of installed equipment.
- 11) A debit or credit entry to transfer all or a portion of the balance in this subaccount, to other adjustment clauses for future rate recovery, as may be approved by the CPUC.
- 12) An debit or credit entry equal to the interest on the average of the balance in the account at the beginning of the month and the balance in the account after the above entries, at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(N)



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(Continued)

**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	