

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 5885E
As of September 3, 2020

Subject: Updates to Pacific Gas and Electric Company's Bundled Procurement Plan Appendix J Brokerages and

Division Assigned: Energy

Date Filed: 07-20-2020

Date to Calendar: 07-22-2020

Authorizing Documents: D0712052

Disposition:	Accepted
Effective Date:	08-19-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(415)973-4587

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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

July 20, 2020

Advice 5885-E

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

Subject: Updates to Pacific Gas and Electric Company's Bundled Procurement Plan – Appendix J Brokerages and Exchanges

Purpose

Pacific Gas and Electric Company (PG&E) requests approval to update PG&E's Bundled Procurement Plan (BPP), Appendix J – Brokerages and Exchanges, to update section A, "Brokerages;" section B, "Exchanges and Futures Commission Merchants;" and section C, "GHG Product Authorized Exchanges and Futures Commission Merchants." PG&E seeks these updates to reflect a newly executed brokerage agreement with BGC Financial, to remove certain entities which are defunct or with whom PG&E no longer does business, and to otherwise clarify its list of exchanges and futures commission merchants and GHG product authorized exchanges and futures commission merchants.

Background

In accordance with Decision (D.) 07-12-052, all proposed updates to the BPP are to be made via an advice letter and shall include red-lined pages of the BPP as well as clean replacement pages.¹ Below, PG&E describes the updates to Appendix J in the BPP, and is including Attachments A and B to reflect the relevant changes. Attachment A is the red-lined version of the changes and Attachment B is the clean version of the changes. .

Request

PG&E is proposing a number of revisions to Appendix J to update and clarify its list of brokerages, exchanges, and futures commission merchants.

First, PG&E is proposing to add BGC Financial to its list of brokerages. PG&E seeks to expand the pool of authorized brokers to ensure PG&E is receiving a diversity of market views and to enable PG&E to transact.

¹ D.07-12-052 at pp. 184-185.

Second, PG&E seeks to remove a series of brokers that are either defunct or no longer do business with PG&E.

Third, PG&E seeks approval to update the list of Exchanges and Futures Commission Merchants in Appendix J. PG&E seeks to add ICE NGC Canada Inc. to the list of approved Exchanges and remove Natural Gas Exchange ("NGX") from the list, as NGX has been restructured into ICE NGC Canada. PG&E also seeks to remove several Exchanges and FCMs that PG&E no longer does business with.

Finally, PG&E requests approval to update its lists of authorized GHG Product Authorized Exchanges and Futures Commission Merchants as the changes reflect the same modifications discussed in the previous paragraph.

Attachments

Attachment A Redline Version, Appendix J (Sheets 158-160)
Attachment B Clean Version, Appendix J (Sheets 158-160)

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 August 10, 2020, which is 21 days² 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.

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

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 California Public Utilities Commission (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

PG&E requests that this Tier 2 advice letter³ become effective on regular notice, August 19, 2020, which is 30 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for R.16-02-007 and R.20-05-003. 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/>.

³ Consistent with Advice Letters 4796-E and 4866-E, PG&E is submitting updates to its Commission-approved Brokerages and Exchanges via Tier 2 advice letter.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.16-02-007, R.20-05-003



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) #: 5885-E

Tier Designation: 2

Subject of AL: Updates to Pacific Gas and Electric Company's Bundled Procurement Plan – Appendix J Brokerages and Exchanges

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.07-12-052

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: 8/19/20

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

PACIFIC GAS AND ELECTRIC COMPANY

Attachment A

Redline Version, Appendix J (Sheets 158-160)



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 157
Pacific Gas and Electric Company
2014 Bundled Procurement Plan

APPENDIX J

BROKERAGES AND EXCHANGES



A. Brokerages¹

- Amerex Brokers, LLC
- ~~Anahau Energy, LLC (a Women, Minority, or Disabled Veteran Owned Business Enterprises (“WMDVBE”))~~
- BGC Environmental Brokerage Services, L.P.
- BGC Financial, L.P.
- Bluesource Energy, LLC (WMDVBE)
- Classic Energy LLC
- ~~Clear Energy Brokerage & Consulting, LLC~~
- ~~Edge Energy, LLC~~
- ~~Energy Trade Management GP, LLC~~
- EOX Holdings, LLC
- Equus Energy Group, LLC
- Evolution Markets, Inc.
- ~~GA Global Markets, LLC~~
- ICAP United, Inc.
- ICAP Energy LLC
- INTL FCStone Financial, Inc.
- Karbone, Inc.
- Landmark
- ~~Marex Spectron~~

¹ Including any subsidiaries, if applicable. PG&E will provide its Procurement Review Group (PRG) a list of subsidiaries on an annual basis.



• ~~Sterling Planet, Inc.~~

- TFS Energy Futures, LLC
- Tullett Prebon Americas Corp.

B. Exchanges² and Futures Commission Merchants³

1. Exchanges

- CME Group Inc. (“CME”) (e.g., New York Mercantile Exchange (“NYMEX”))
- ~~Intercontinental Exchange, Inc.~~ (“ICE”)
- ~~ICE NGX Canada Inc. (which is a wholly owned, indirect subsidiary of ICE)~~
- ~~Natural Gas Exchange (“NGX”)~~
- ~~Nasdaq, Inc. (“NASDAQ”)~~

2. Futures Commission Merchants

- ~~Barclays Capital, Inc.~~
- BNP Paribas Prime Brokerage, Inc.
- ~~J.P. Morgan Futures, Inc.~~
- Macquarie Futures USA, LLC
- ~~Mizuho Securities, USA, Inc.~~
- ~~Wells Fargo Bank~~

² PG&E can procure GHG products on exchanges that were approved by the California Public Utilities Commission (“CPUC” or “Commission”) for power procurement before D.12-04-046 was issued. For exchanges not previously approved, PG&E must submit a Tier 2 advice letter detailing: (1) what exchange it is seeking to use; (2) the liquidity and transparency of the exchange, specific to GHG Products, including an explanation of how the Commission can be assured that the price of the products procured on the exchange is reasonable; and (3) the regulatory authority or authorities the exchange is subject to. *Id.*, OP 8.h. Exchanges approved for GHG products are identified in Section C below.

³ Including any exchange or futures commission merchant subsidiaries, if applicable. PG&E will provide its PRG a list of subsidiaries on an annual basis.



C. GHG Product Authorized Exchanges and Futures Commission Merchants⁴

1. Exchanges

- CME
- ICE
- ICE NGX Canada Inc. (which is a wholly owned, indirect subsidiary of ICE)

2. Futures Commission Merchants

- ~~Barclays Capital, Inc.~~
- BNP Paribas Prime Brokerage, Inc.
- ~~J.P. Morgan Futures, Inc.~~
- Macquarie Futures USA, LLC
- ~~Mizuho Securities, USA, Inc.~~
- ~~Wells Fargo Bank~~

⁴ Including any exchange or futures commission merchant subsidiaries, if applicable. PG&E will provide its PRG a list of subsidiaries on an annual basis.

PACIFIC GAS AND ELECTRIC COMPANY

Attachment B

Clean Version, Appendix J (Sheets 158-160)



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 157
Pacific Gas and Electric Company
2014 Bundled Procurement Plan

APPENDIX J

BROKERAGES AND EXCHANGES

Decision No. 15-10-031

Issued by
Robert Kenney
Senior Vice President
Regulatory Affairs

Date Filed _____
Effective _____
Resolution No. _____



A. Brokerages¹

- Amerex Brokers, LLC
- BGC Environmental Brokerage Services, L.P.
- BGC Financial, L.P.
- Bluesource Energy, LLC (WMDVBE)
- Classic Energy LLC
- EOX Holdings, LLC
- Equus Energy Group, LLC
- Evolution Markets, Inc.
- ICAP United, Inc.
- ICAP Energy LLC
- INTL FCStone Financial, Inc.
- Karbone, Inc.
- Landmark
- TFS Energy Futures, LLC
- Tullett Prebon Americas Corp.

¹ Including any subsidiaries, if applicable. PG&E will provide its Procurement Review Group (PRG) a list of subsidiaries on an annual basis.



B. Exchanges² and Futures Commission Merchants³

1. Exchanges

- CME Group Inc. (“CME”) (e.g., New York Mercantile Exchange (“NYMEX”))
- Intercontinental Exchange, Inc. (“ICE”)
- ICE NGX Canada Inc. (a wholly owned, indirect subsidiary of ICE)

2. Futures Commission Merchants

- BNP Paribas Prime Brokerage, Inc.
- Macquarie Futures USA, LLC

C. GHG Product Authorized Exchanges and Futures Commission Merchants⁴

1. Exchanges

- CME
- ICE
- ICE NGX Canada Inc. (a wholly owned, indirect subsidiary of ICE)

² PG&E can procure GHG products on exchanges that were approved by the California Public Utilities Commission (“CPUC” or “Commission”) for power procurement before D.12-04-046 was issued. For exchanges not previously approved, PG&E must submit a Tier 2 advice letter detailing: (1) what exchange it is seeking to use; (2) the liquidity and transparency of the exchange, specific to GHG Products, including an explanation of how the Commission can be assured that the price of the products procured on the exchange is reasonable; and (3) the regulatory authority or authorities the exchange is subject to. *Id.*, OP 8.h. Exchanges approved for GHG products are identified in Section C below.

³ Including any exchange or futures commission merchant subsidiaries, if applicable. PG&E will provide its PRG a list of subsidiaries on an annual basis.

⁴ Including any exchange or futures commission merchant subsidiaries, if applicable. PG&E will provide its PRG a list of subsidiaries on an annual basis.



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 160
Pacific Gas and Electric Company
Bundled Procurement Plan

2. Futures Commission Merchants

- BNP Paribas Prime Brokerage, Inc.
- Macquarie Futures USA, LLC

**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	