

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



March 1, 2021

**Advice Letters 5897-E and 5897-E-A**

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, CA 94177

**SUBJECT: Procurement Transaction Quarterly Compliance Submittal (Q2, 2020)**

Dear Mr. Jacobson,

Advice Letter (AL) 5897-E (Procurement Transaction Quarterly Compliance Submittal (Q2, 2020)) and AL5897-E-A (Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q2, 2020)) are approved, effective August 29, 2020, for the reasons described below.

**Background:**

Pacific Gas and Electric Company (PG&E) filed AL 5897-E on July 30, 2020, requesting approval of transactions made in the second quarter of 2020 under PG&E's 2014 Conformed Bundled Procurement Plan ("2014 BPP").<sup>1</sup> Among the transactions for which PG&E seeks approval are greenhouse gas (GHG) compliance instruments. The Public Advocates Office (Cal Advocates) timely protested AL 5897-E on August 19, 2020. Cal Advocates stated that PG&E had not provided sufficient information to assess whether PG&E's GHG compliance instrument transactions conformed with the 2014 BPP, and Cal Advocates suggested that the Commission "require PG&E to provide a calculation supporting the quantity of compliance instruments procured."<sup>2</sup> PG&E timely replied to the protest on August 25, 2020 and provided the information Cal Advocates had requested. Following this, Energy Division staff confirmed with Cal Advocates that PG&E's reply had satisfied Cal Advocates' request and that PG&E intends to provide similar information in its Quarterly Compliance Reports moving forward.

Energy Division reviewed this Advice Letter and related supplemental responses and determined that the described transactions satisfy related Commission Orders.

In addition, on January 6, 2020, PG&E filed supplemental AL 5897-E-A to correct errors in Confidential Attachment C to AL 5897-E-A. PG&E corrected these errors in response to

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<sup>1</sup> AL 5897-E at 1.

<sup>2</sup> Cal Advocates Protest at 2.

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negative findings by the Commission's Utility Audits Branch during an audit of AL 5897-E. These errors were not related to the subject of Cal Advocates' protest.

**Discussion:**

Rule 7.6.1 of General Order 96-B states the following:

Notwithstanding a timely protest, the reviewing Industry Division may approve an advice letter that is subject to disposition under this rule and is otherwise proper, if the protest either (1) is not made on proper grounds as set forth in General Rule 7.4.2, (2) may be rejected on a technical basis as discussed in this rule, or (3) is clearly erroneous.

Cal Advocates' protest was made on proper grounds and is not erroneous. Nevertheless, because Cal Advocates has received the information it requested and because PG&E has offered to provide similar information in its future Quarterly Compliance Reports, Energy Division determines that there is a technical basis on which to reject the protest and approve the advice letter. Energy Division requests that Cal Advocates alert Energy Division if the requested information in question, or any other information that would facilitate evaluating the compliance of BPP Advice Letters, does not appear in future Quarterly Compliance Reports so that Energy Division may take appropriate action to remedy any such future deficiencies.

Finally, Energy Division has determined that supplemental AL 5897-E-A adequately addresses the issues identified by the Utility Audits Branch.

**Disposition:**

Energy Division hereby approves Pacific Gas and Electric Company's AL 5897-E and supplemental AL 5897-E-A.

Sincerely,

Handwritten signature of Edward Randolph in black ink, with the initials "(for)" written in parentheses to the right of the signature.

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

cc: R.16-02-007, R.20-05-003, [Julie.Halligan@cpuc.ca.gov](mailto:Julie.Halligan@cpuc.ca.gov), [Kaj.Peterson@cpuc.ca.gov](mailto:Kaj.Peterson@cpuc.ca.gov)



**Erik Jacobson**  
Director  
Regulatory Relations

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San Francisco, CA 94177

Fax: 415-973-3582

January 6, 2021

**Advice 5897-E-A**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: Procurement Transaction Quarterly Compliance Filing (Q2, 2020)**

**Purpose**

Pacific Gas and Electric Company ("PG&E") is submitting this supplemental advice letter to the California Public Utilities Commission ("Commission" or "CPUC") related to its Procurement Transaction Quarterly Compliance Report ("QCR") for record period April 1, 2020 to June 30, 2020, (Q2-2020) to replace the material in Confidential Attachment C of Advice Letter 5897-E. The rest of the content and attachments in the original advice letter remain unchanged. Please note Confidential Attachments A, B and C are all contained within the same workbook (filename: ElecPhysFin.xls), for the electric transactions. PG&E is including the entire ElecPhysFin.xls workbook, however, the Confidential Attachment C tab is the only tab that has been updated.

**Background**

**Advice Letter 5897-E**

PG&E submitted its QCR for Q2-2020 on July 30, 2020 in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports to be submitted within 30 days of the end of the quarter.

**Advice Letter 5897-E-A**

Per discussions with CPUC, Utility Audit Branch (UAB) staff, PG&E is submitting this supplemental advice letter in response to UAB's audit finding:

**Confidential Attachments**

**Attachment 1: ElecPhysFin - CLEAN**

Revised Confidential Attachment C, Electric Transactions Summary

Attachment 2: ElecPhysFin - REDLINE

Revised Confidential Attachment C, Electric Transactions Summary

**Protests**

PG&E asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 5897-E and not reopen the protest period.

**Effective Date**

PG&E requests that this Tier 2 advice letter become effective concurrent with original Advice Letter 5897-E on August 29, 2020, which is 30 calendar days after the original date of submittal.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the service list for Rulemaking ("R.") 16-02-007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

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/S/

Erik Jacobson  
Director, Regulatory Relations

**Attachments**

Attachment 1: Atch 1 ElecPhysFin -CLEAN.docx

Attachment 2: Atch 2 ElecPhysFin -REDLINE.docx

Attachment 3: Confidentiality Declaration and Matrix

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



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5897-E-A

Tier Designation: 2

Subject of AL: Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q2, 2020)

Keywords (choose from CPUC listing): Compliance, Procurement

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.15-10-031 and D.03-12-062

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

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

Confidential treatment requested?  Yes  No

If yes, specification of confidential information: See Confidentiality Declarations and Matrix  
 Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Marianne Aikawa, (415)973-0375

Resolution required?  Yes  No

Requested effective date: 8/29/20

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 proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss 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](mailto: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](mailto:PGETariffs@pge.com)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: District of Columbia Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Advice 5897-E-A  
January 6, 2021

## **Attachment 1**

Atch 1 ElecPhysFin -CLEAN.docx

(CONFIDENTIAL)

Advice 5897-E-A  
January 6, 2021

## **Attachment 2**

Atch 2 ElecPhysFin -REDLINE.docx

(CONFIDENTIAL)

Advice 5897-E-A  
January 6, 2021

## **Attachment 3**

### **Confidentiality Declaration and Matrix**

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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING  
SUPPLEMENTAL ADVICE LETTER 5897-E-A**

**DECLARATION OF MARIANNE AIKAWA  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S  
SUPPLEMENTAL ADVICE LETTER 5897-E-A, Q2 2020 QCR:  
CONFIDENTIAL ATTACHMENTS 1 AND 2**

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 January 6, 2021 Supplemental Advice Letter 5897-E-A, Q2 2020 QCR for Confidential Attachments 1 (ElecPhysFin-CLEAN) and 2 (ElecPhysFin-REDLINE).
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 January 6, 2021, at San Francisco, California.

/s/

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Marianne Aikawa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5897-E-A  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2020  
 JANUARY 6, 2021**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
<b>Document: Quarterly Compliance Report Supplemental Advice Letter 5897 E-A</b>			
Atch 1 ElecPhysFin -CLEAN.doc  Atch 2 ElecPhysFin - REDLINE.doc  • Conf Attachment A-Electric Transactions and Financial Transactions Tabs	Item 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
Atch 1 ElecPhysFin -CLEAN.doc  Atch 2 ElecPhysFin - REDLINE.doc  • Conf Attachment B-Counterparty Tab	Public Utilities Code Section 454.5(g)	The information contains confidential counterparty information. Release of this commercially market sensitive information could impact market prices because it would release financing terms to other market participants and impact future negotiations. This could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage by the disclosure of counterparty information. This information could be used by other market participants to gain a commercial advantage.	3 Years
Atch 1 ElecPhysFin -CLEAN.doc  Atch 2 ElecPhysFin - REDLINE.doc  • Revised Conf Attachment C-Summaries Tab	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

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

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

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

California Hub for Energy Efficiency  
Financing

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

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

Chevron Pipeline and Power  
City of Palo Alto

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

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

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

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

Green Power Institute  
Hanna & Morton  
ICF

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

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

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

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

Pioneer Community Energy

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

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

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

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