

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 5905E
As of February 23, 2021

Subject: Updates to Pacific Gas and Electric Company's Bundled Procurement Plan Procurement Products (Appendix A); Procurement Processes and Methods (Appendix B); and Sales Framework (Appendix S)

Division Assigned: Energy

Date Filed: 08-05-2020

Date to Calendar: 08-10-2020

Authorizing Documents: D1510031

Disposition:

Signed

Effective Date:

02-11-2021

Resolution Required: Yes

Resolution Number: E-5109

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



August 5, 2020

Advice 5905-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Updates to Pacific Gas and Electric Company's Bundled Procurement Plan – Procurement Products (Appendix A); Procurement Processes and Methods (Appendix B); and Sales Framework (Appendix S)

Purpose

Pacific Gas and Electric Company (PG&E) requests California Public Utilities Commission (CPUC or Commission) approval to update its Bundled Procurement Plan (BPP) approved in Commission Decision (D.) 15-10-031.¹ This BPP update includes revisions to Appendix A (Procurement Products), Appendix B (Procurement Processes and Methods), and Appendix S (Sales Framework).

Background

In D.15-10-031, the Commission adopted the investor-owned utilities' (IOUs) proposed BPPs with modifications and required PG&E to submit a conformed copy of its BPP, which was submitted on December 10, 2015. Since then, PG&E has updated the BPP as needed when market conditions or electric portfolio changes necessitate modifying the BPP.

D.15-10-031 also contains a discussion regarding Resource Adequacy (RA) capacity and provides instruction on the appropriate vehicle for RA transactions. Citing the fact that RA sales differ materially from RA purchases in terms of available quantity, potential market participants, and time-frame for transactions, D.15-10-031 states that IOUs are permitted to (1) classify RA products as non-standard products when the IOU is acting as the seller of the RA products, and (2) transact sales of RA products bilaterally for terms longer than

¹ In D.15-10-031, the Commission approved PG&E's proposed 2014 BPP with modifications and required PG&E to conform the BPP to incorporate modifications made in the D.15-10-031 no later than 90 days after the effective date of D.15-10-031. PG&E filed its conformed BPP on December 10, 2015, via Advice 4750-E, and the Energy Division issued a disposition letter approving Advice 4750-E on June 15, 2016.

one quarter, subject to adequate price support in the quarterly compliance report. On the other hand, D.15-10-031 emphasizes that (A) RA capacity is a standard product when the IOU is acting as the buyer of the RA products and (B) procurement through requests for offers (RFOs) is the appropriate vehicle for RA purchases longer than one quarter in duration.²

While PG&E agrees with the sentiment that RFOs remain the most appropriate vehicle for the majority of RA purchases, the restrictions associated with treating RA capacity as a standard product that must only be transacted through RFOs when PG&E is the buyer have come to limit PG&E's ability to cost-effectively comply with RA requirements in recent years. These limitations have become increasingly problematic as a result of necessary changes to RA requirements pursuant to D.19-02-022. In addition to adopting multi-year local RA requirements for all load serving entities (LSEs), D.19-02-022 also disaggregates six of PG&E's seven local areas beginning with the 2020 RA compliance year. Before 2020, each LSE in PG&E's service territory effectively had two procurement obligations with respect to CPUC local RA requirements: (1) a requirement to procure in the "Bay Area" local area and (2) a requirement to procure in the "Other PG&E" local area. The "Other PG&E" local area was an aggregation of the the Humboldt, Fresno, Kern, North Coast/North Bay, Sierra, and Stockton local areas, and each LSE could procure in any of the six areas in order to meet its aggregated requirement. Because the overall quantity of local capacity available in the six aggregated areas significantly exceeded the total aggregated requirements, purchases exclusively through RFOs were feasible in order to comply with the aggregated procurement obligation. While PG&E understands and supports the rationale associated with disaggregation of the "Other PG&E" local area, the disaggregated RA requirement for each local area has eliminated the excess capacity associated with the aggregation. This has constrained the available quantity, reduced potential market participants, and limited the time-frame for transactions in many cases, much like the situation acknowledged by the Commission in D.15-10-031 with respect to RA sales. Thus, the challenges of purchasing RA products have grown as the requirements have become more precise. As a result of these new challenges, it is appropriate for the Commission to revisit whether RA should continue to be classified as a standard product that may only be transacted through RFOs when the IOU is acting as the buyer of the RA products.

In addition, as the CPUC has acknowledged, the RA market is experiencing challenges ensuring that all LSEs meet their compliance requirements. These challenges stem from a reduction in available capacity due to power plant retirements as well as a decentralization of LSE procurement. On January 13, 2020, pursuant to D.19-02-022, the Commission's Energy Division released a report, titled *The State of the Resource Adequacy Market-Revised*, in which it concludes that "the RA market remains tight" and

² D.15-10-031, pg. 33

that it expects the market to “continue to tighten.”³ Recently, LSEs have been increasingly submitting requests for waiver of their local RA procurement obligations. Ten out of the 36 Commission-jurisdictional LSEs submitted local waiver requests in their 2018 Annual RA Compliance Filings.⁴ Twenty of the 42 Commission-jurisdictional LSEs submitted local waiver requests in their 2019 Annual RA Compliance Filings.⁵ To this day, LSEs continue to struggle to find RA products for purchase, as demonstrated through monthly local RA waiver requests submitted as part of LSEs’ monthly RA Compliance Filings.

Discussion

PG&E seeks revisions to its BPP to address the challenges associated with the bilateral RA market discussed in detail above. Specifically, PG&E proposes revisions to its authorized Procurement Products in Appendix A and Procurement Processes and Methods in Appendix B, and proposes clarifications and corrections to reflect the intended meaning in several sections of its Sales Framework in Appendix S.

PG&E first seeks revisions to Appendices A and B to remove competitive disadvantages that the BPP creates for IOUs as compared to other LSEs with respect to purchases of RA products for terms longer than one quarter. As described above, because RA products are currently designated as “standard products” when PG&E is acting as the purchaser, PG&E is unable to enter into negotiated bilateral contracts with terms exceeding three months to purchase such products. Instead, it must transact through competitive solicitations for these longer term contracts. Given that recent changes to the local RA requirements have constrained available local RA quantity, reduced potential market participants, and limited the time-frame for transactions, purchasing solely through RFOs may no longer be feasible. It also places PG&E at a competitive disadvantage in procuring capacity, as non-IOU LSEs can contract bilaterally for the local RA capacity without restrictions. Revising Appendices A and B to designate all RA products as non-standard products will allow PG&E to enter into bilateral contracts for the purchase of RA with terms in excess of three months more quickly, while still complying with the broader BPP parameters. To that end, PG&E requests approval to modify Appendix A, “Procurement Products” and Appendix B, “Procurement Processes and Methods” to designate all RA products as non-standard products regardless of whether PG&E is engaged in a purchase or sale of the RA products.

PG&E next seeks to modify Appendix S of the BPP to permit PG&E to engage in transactions whereby parties exchange RA, typically through simultaneous purchases and sales. The modifications PG&E seeks will provide PG&E the ability to sell RA products in another market participant’s solicitation to facilitate purchases associated with

³ CPUC, *The State of the Resource Adequacy Market-Revised*, dated January 13, 2020, pp. 40, 41, available at <https://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442463739>.

⁴ *Id.*, p. 32.

⁵ *Id.*, p. 35.

meeting PG&E's RA compliance. These purchases are facilitated by allowing the simultaneous purchases and sales to occur using resources that have different RA attributes, predominantly different Local RA attributes. The CPUC recognized these types of transactions as "RA Swaps" in Resolution E-5063 in response to Southern California Edison Company's AL 4110-E, which requested that the CPUC adopt these simultaneous transactions as a single product.⁶ While PG&E is not requesting to treat these transactions as a single product, the simultaneous purchase and sale of different RA resources may be the only means by which PG&E can acquire unique Local RA attributes from other LSEs. This situation may occur if the other LSE does not have any excess System RA capacity to sell. Due to the tightening market, and higher RA prices, this scenario is likely to occur more often in the future. Therefore, PG&E asks the CPUC to approve the requested modifications to Appendix S to recognize that PG&E cannot exclusively sell RA in its own competitive solicitations due to instances in which RA sales must be made to facilitate an RA purchase through a set of simultaneous purchase and sale transactions.

PG&E also asks to remove the standards and criteria for PG&E's management and sales of physical energy only products currently contained with Appendix S.⁷ While PG&E has no intention of beginning to sell physical energy only products at this time, there may be instances in which PG&E has purchased physical energy from imports for the purpose of meeting RA requirements, yet, due to changes in need, the physical energy may no longer be needed for RA compliance. The ability to sell this physical energy utilizing approved processes and methods outside of the standards and criteria currently set forth in Appendix S may benefit customers. Therefore, PG&E requests the CPUC approve the removal of the sections of Appendix S that describe selling physical energy only products.

Finally, PG&E proposes to change Appendix S to reflect clarifications and corrections to align with the intended meaning of several sections. These changes include:

(1) how PG&E will evaluate the minimum price supply curve for import capacity counting rights if no import energy offers are available, (2) how operational constraints are incorporated in the local area monthly long position and flexible monthly sales amount, and (3) that transactions facilitated by a broker are treated as bilateral transactions with respect to RA sales. Each of these changes reflects clarifications or corrections that are meant to capture PG&E's existing procurement practices.

⁶ Resolution E-5063, p.3, *available at* <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M327/K106/327106985.PDF>.

⁷ Appendix S currently requires PG&E to sell energy from its owned and contracted resources through the California Independent System Operator Corporation energy markets consistent with Appendices K and L of the BPP and specifies that PG&E will not make term sales of physical energy only products under Appendix S.

Attachments

Confidential Attachment A	Redline Version, BPP Sheets 258-277 (Appendix S)
Confidential Attachment B	Clean Version, BPP Sheets 258- 277 (Appendix S)
Attachment C	Redline Version, BPP Sheet 41 (Appendix A), BPP Sheets 49 and 56 (Appendix B), and BPP Sheets 258-277 (Appendix S) (Public Version)
Attachment D	Clean Version, BPP Sheet 41 (Appendix A), BPP Sheets 49 and 56 (Appendix B), and BPP Sheets 258-277 (Appendix S) (Public Version)
Attachment E	Declaration of Scott Ranzal Seeking Confidential Treatment Pursuant to D.06-06-066, D.14-10-033, and Public Utilities Code §454.5(g)

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 filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 25, 2020, which is 20 days after the date of this filing. 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

PG&E requests that this Tier 3 advice filing 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.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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/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) #: 5905-E

Tier Designation: 3

Subject of AL: Updates to Pacific Gas and Electric Company's Bundled Procurement Plan – Procurement Products (Appendix A); Procurement Processes and Methods (Appendix B); and Sales Framework (Appendix S)

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

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 Declaration 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: Scott Ranzal, (415)264-3638, SDRi@pge.com

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:

Clear Form

PACIFIC GAS AND ELECTRIC COMPANY

Attachment A

CONFIDENTIAL **Redline Version, BPP Sheets 258-277** **(Appendix S)**

PACIFIC GAS AND ELECTRIC COMPANY

Attachment B

CONFIDENTIAL
Clean Version, BPP Sheets 258-277
(Appendix S)

PACIFIC GAS AND ELECTRIC COMPANY

Attachment C

PUBLIC

**Redline Version, BPP Sheet 41 (Appendix A),
BPP Sheets 49 and 56 (Appendix B), and BPP
Sheets 258-277 (Appendix S) (Public Version)**



Line No.	Product	Description	Initial Authorization
14	On-Site Energy or Capacity (Self-Generation on Customer Side of the Meter)	The amount of power measured in MW or MWh that can be generated downstream of the customer's electric meter that can be used to offset the customer's load served by the electric service provider.	D.02-10-062
15	Peak for Off-Peak Exchange	Electric energy, capacity, or A/S or transmission exchanged between counterparties measured in MW or MWh that is agreed to be supplied in an on-peak period in exchange for receiving an amount in an off-peak period. These transactions may also include an exchange of dollars.	D.02-10-062
16	Physical Call (or Put) Option	The right, but not the obligation, to buy or sell physical electricity for delivery on a specific date at a fixed or indexed price (strike). The right to buy is a call option, and the right to sell is a put option.	D.02-10-062
17	Real-Time (Purchase or Sale)	The amount of energy, measured in MWh supplied or received by the control area operator to balance an entity's load and supply.	D.02-10-062
18	Resource Adequacy ("RA") Product (Purchase or Sale)	A capacity product intended to meet RA obligations. RA products sales are non-standard products.	AL 2615-E AL 2897-E D.15-10-031
19	Seasonal Exchange	Electric energy, capacity, or A/S or transmission exchanged between counterparties measured in MW or MWh that is agreed to be supplied during one season or set of months in exchange for receiving an amount in another season or set of months. These transactions may also include an exchange of dollars.	D.02-10-062
20	Tolling Agreement	An agreement to provide (receive) gas in exchange for receiving (providing) electricity.	D.02-10-062 D.04-12-048
21	Emissions Credits Futures or Forwards	Credits or allowances for emissions that can be bought or sold in order to comply with emissions limits.	D.03-12-062
22	Forecast Insurance	A method for managing load forecast (volume and shape) risk.	D.03-12-062
23	Firm Transmission Rights ("FTR") Locational Swaps	Over-the-counter basis swaps associated with Firm Transmission Rights. Swaps are financially settled directly with a counterparty or may be financially cleared through financial clearinghouse.	D.03-12-062
24	Non-FTR Locational Swaps and Futures	Locational basis swaps or futures. Swaps are financially settled directly with a counterparty or may be cleared through a financial clearinghouse. Futures are traded on an exchange.	D.03-12-062
25	Weather Triggered Options	A method for managing temperature and other weather forecast risks.	D.03-12-062



may also initiate financial clearing with a clearing house such as NYMEX or the ICE. Brokers facilitate the trading of physical and financial products. Brokers, as part of their price discovery role, provide price reporting services to subscribing clients.

Buyers communicate bids to the broker. If a seller hits the bid, the trade is completed. If a seller does not hit the bid, the buyer can ask the broker to work its bid in the market. The broker will provide the buyer feedback if its bid is not hit by a seller. The buyer can adjust its bid until it is hit by a seller. Alternatively, if the buyer likes an offer communicated by the broker, the buyer can lift that offer to complete the trade. Since brokers facilitate trades of standard products and non-standard products and trading is anonymous, selection is made by product availability, credit availability and price. A list of brokers that PG&E is authorized to use is included in Appendix J.

c. CAISO Markets and Processes

Since April 2009, the CAISO has managed a Day-Ahead Market (“DAM”), also known as the Integrated Forward Market (“IFM”) and provided for Locational Marginal Pricing (“LMP”) at thousands of “nodes,” or points of injection and withdrawal of power on the transmission grid. Under the LMP framework, suppliers that bid into the DAM are paid based on a specific nodal price, while load serving entities (“LSE”) are charged based on an aggregation of nodal prices in each utility’s service territory, or Load Aggregation Points. The CAISO receives bids and offers from individual buyers and sellers, determines which supplies would be used to meet the needs (i.e., energy and ancillary services, while simultaneously addressing transmission congestion and transmission line losses) and sets market clearing prices for all transactions. Through its



TABLE B-1
PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT PROCESSES AND METHODS

Item #	Transaction Process	Description	Initial Authorization
1	Competitive Solicitations	Widely distributed request for offers or proposals. Required items include among other things: Description of product requirements, term, minimum and maximum bid quantities, scheduling and delivery attributes, credit requirements, and pricing attributes.	D.02-10-062 D.04-12-048 AL 2615-E D.07-12-052
2	Direct bilateral contracting with counterparties for short-term products (e.g., three months or less)	Bilateral process for products procured with a term three months or less. IOUs demonstrate that such transactions are reasonable based on available and relevant market data supporting the transaction. The demonstration may include showing competing price offers, result of market surveys, broker and online quotes, and/or other source of price information such as published indices, historical price information for similar time blocks, and comparison to RFOs completed within one month of the transaction.	D.02-10-062 D.04-12-048 AL 2615-E
3	Negotiated bilateral contracts for non-standard products which terms exceed three months provided that the IOUs include a product justification in quarterly compliance filings.	Process to purchase products provided they are included in quarterly compliance filings to justify the need and process in each case. Terms and conditions are benchmarked against the best available market information for similar products recently offered. Resource Adequacy ("RA") products purchases are treated as a standard product; RA sales are treated as a non-standard products.	D.03-12-062 D.04-12-048 AL 2615-E D.14-02-040 D.15-10-031
4	Inter-Utility Exchanges	Product exchange with other regulated utilities and other load-serving entities negotiated through private negotiation crafted to best fit the resources and needs of both parties.	D.02-10-062 D.04-12-048 AL 2615-E
5	ISO Markets and Processes: Imbalance Energy, Real-Time, Day-Ahead, Convergence Bids, and Capacity Procurement Mechanism including Competitive Solicitation Process	Spot market transactions are authorized to meet short-term needs. Convergence Bids are authorized to manage specific areas of portfolio risks and renewable scheduling limitations. Participation in the Capacity Procurement Mechanism and Competitive Solicitation Processes are authorized to meet CAISO backstop capacity needs.	D.02-10-062 D.04-12-048 AL 2615-E D.10-12-034 D.15-10-031
6	Transparent Exchanges, such as NYMEX and Intercontinental Exchange, Voice and On-Line Brokers	Electronic trading exchanges for transparent prices.	D.02-10-062 D.03-12-062 D.04-12-048 AL 2615-E
7	Renewables Portfolio Standard ("RPS")-Eligible Utility Ownership of Generation	Utility ownership of generation can be pursued through an RFO under certain conditions (see D.07-12-052 at 198-205; D.08-11-008 at 18-20) or outside of the RFO process under certain conditions (see D.07-12-052 at 209-213; D.08-11-008 at 20-23).	D.07-12-052 D.08-11-008



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 258
Pacific Gas and Electric Company
2014 Bundled Procurement Plan

APPENDIX S

SALES FRAMEWORK

Decision No. _____

Issued by
Robert Kenney
Vice President
Regulatory and External Affairs

Date Filed _____
Effective _____
Resolution No. _____



A. Introduction/Background

This Appendix describes the standards and criteria for Pacific Gas and Electric Company's (PG&E's) management and sales of ~~physical energy only products~~, Resource Adequacy (RA) Products, and Import Capacity Counting Rights. Due to customer load departure, PG&E may encounter scenarios in which portfolio products exceed the requirements of the portfolio. In these situations, the Sales Framework guides actions PG&E will take. In addition, any transactions under this Sales Framework Appendix will be filed for approval through the Quarterly Compliance Reports (QCR), as required by the Bundled Procurement Plan (BPP).

B. Overview of Sales Framework

This section provides a description of the commercial processes and activities that PG&E will pursue to manage any sales of its portfolio of ~~physical energy~~, RA Products, and Import Capacity Counting Rights. These processes and activities include: (1) product terms and volumes; (2) commercial processes; and (3) evaluation methodologies. As a result of Decision (D.) 20-06-002, PG&E will offer resource adequacy capacity from resources located in Local Reliability Areas¹ for delivery periods covering 2021 and 2022 to facilitate LSE compliance with ~~all three years in~~ the multiyear framework adopted in Decision (D.) 19-02-022.

¹ Local Reliability Areas refers to Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.



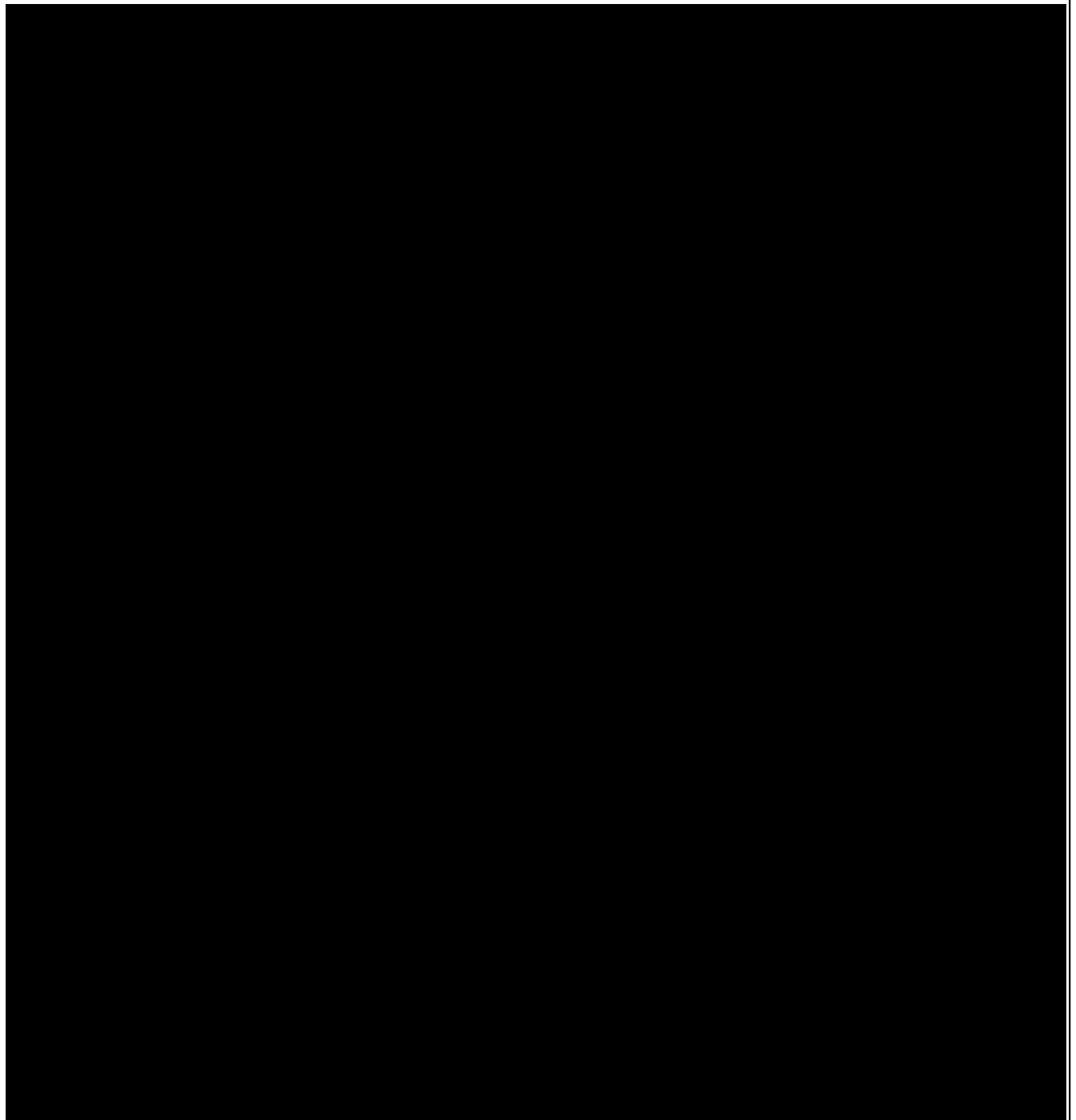
~~1.~~ ~~Physical Energy only Sales~~

~~2~~1. RA Product and Import Capacity Counting Right



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 261
Pacific Gas and Electric Company
2014 Bundled Procurement Plan



Decision No. _____

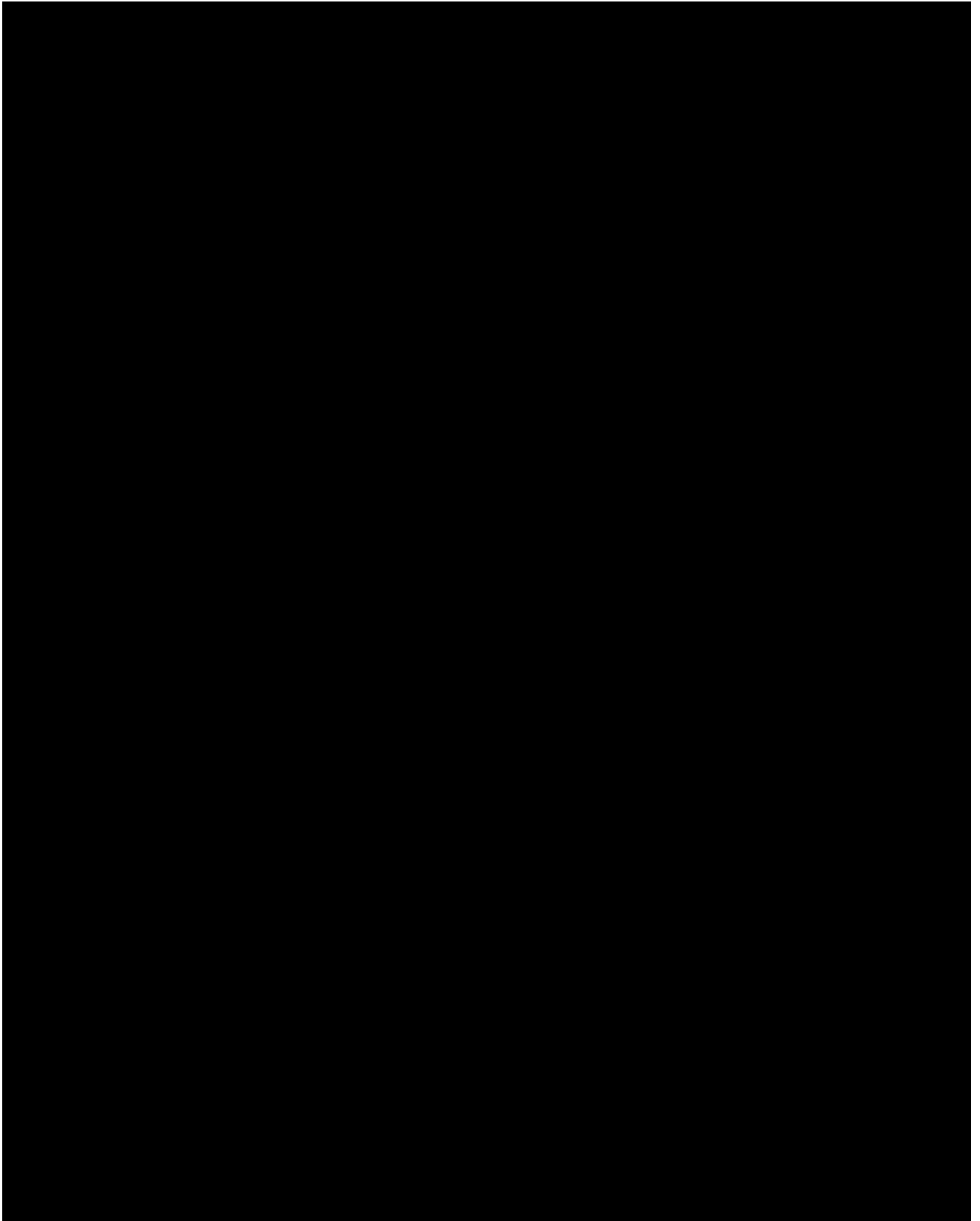
Issued by
Robert Kenney
Vice President
Regulatory and External Affairs

Date Filed _____
Effective _____
Resolution No. _____



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 262
Pacific Gas and Electric Company
2014 Bundled Procurement Plan



Decision No. _____

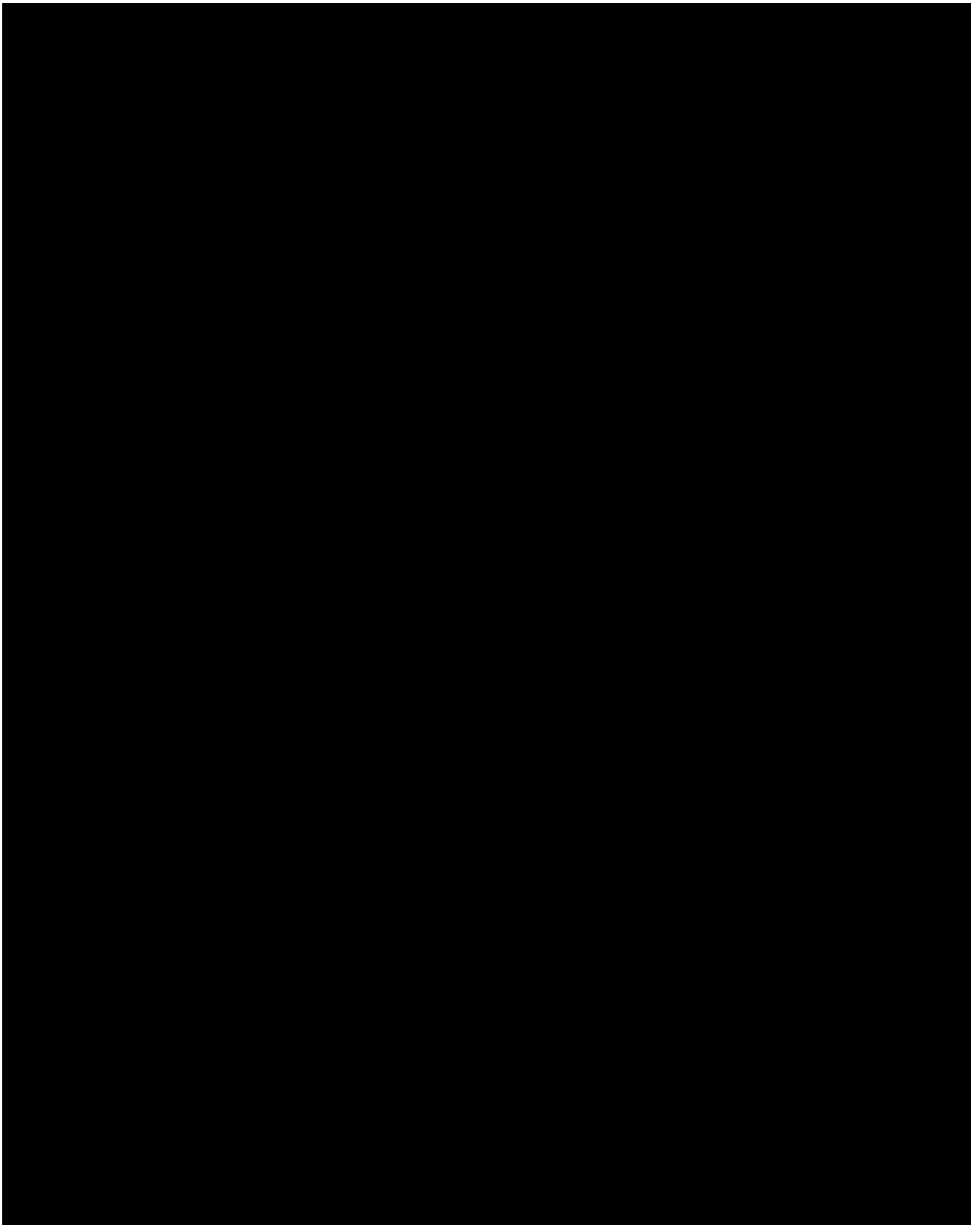
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Effective _____
Resolution No. _____



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 263
Pacific Gas and Electric Company
2014 Bundled Procurement Plan



Decision No. _____

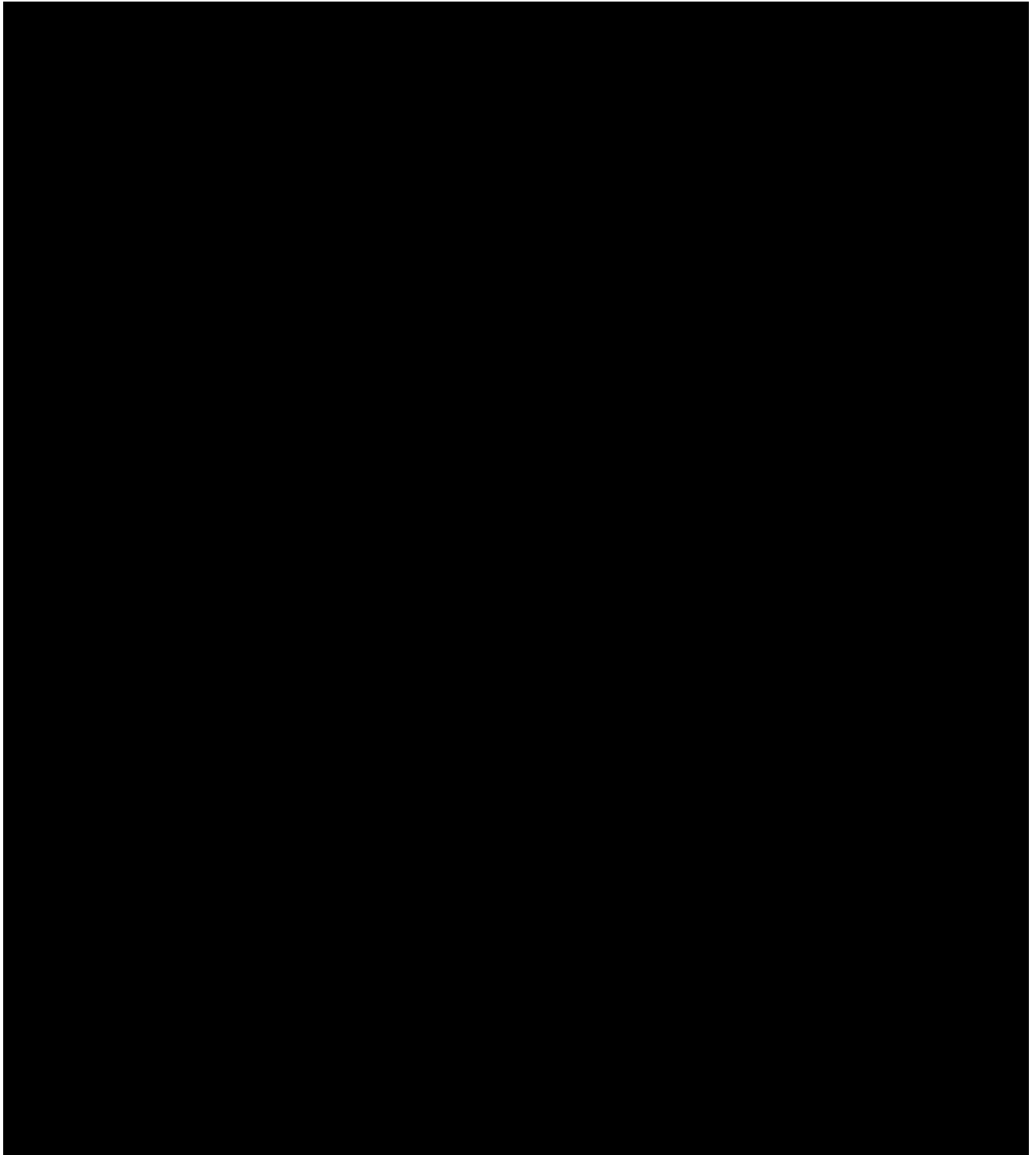
Issued by
Robert Kenney
Vice President
Regulatory and External Affairs

Date Filed _____
Effective _____
Resolution No. _____



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 264
Pacific Gas and Electric Company
2014 Bundled Procurement Plan



⁴ Local Area refers to the separate Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.

Decision No. _____

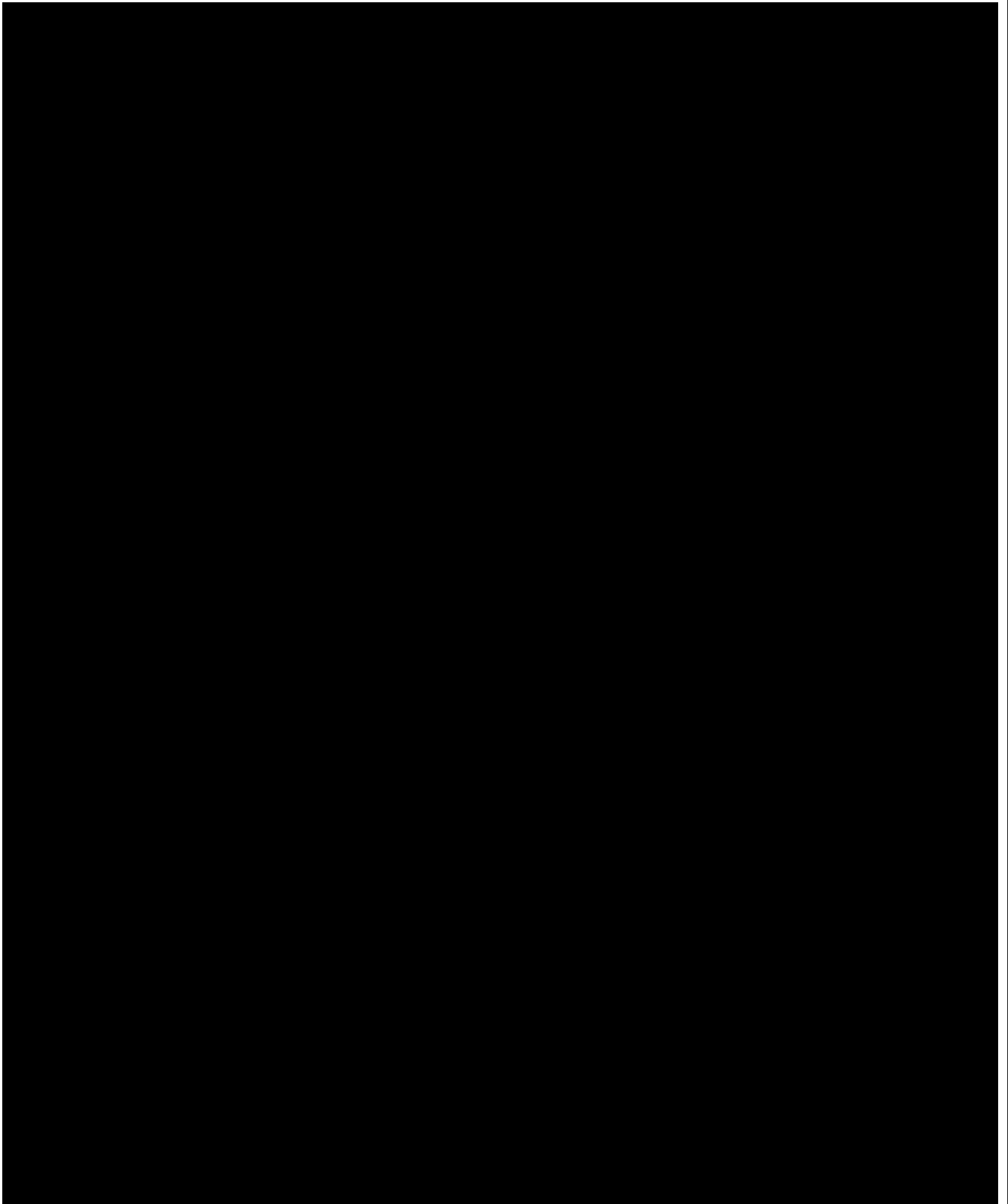
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Robert Kenney
Vice President
Regulatory and External Affairs

Date Filed _____
Effective _____
Resolution No. _____



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 265
Pacific Gas and Electric Company
2014 Bundled Procurement Plan



Decision No. _____

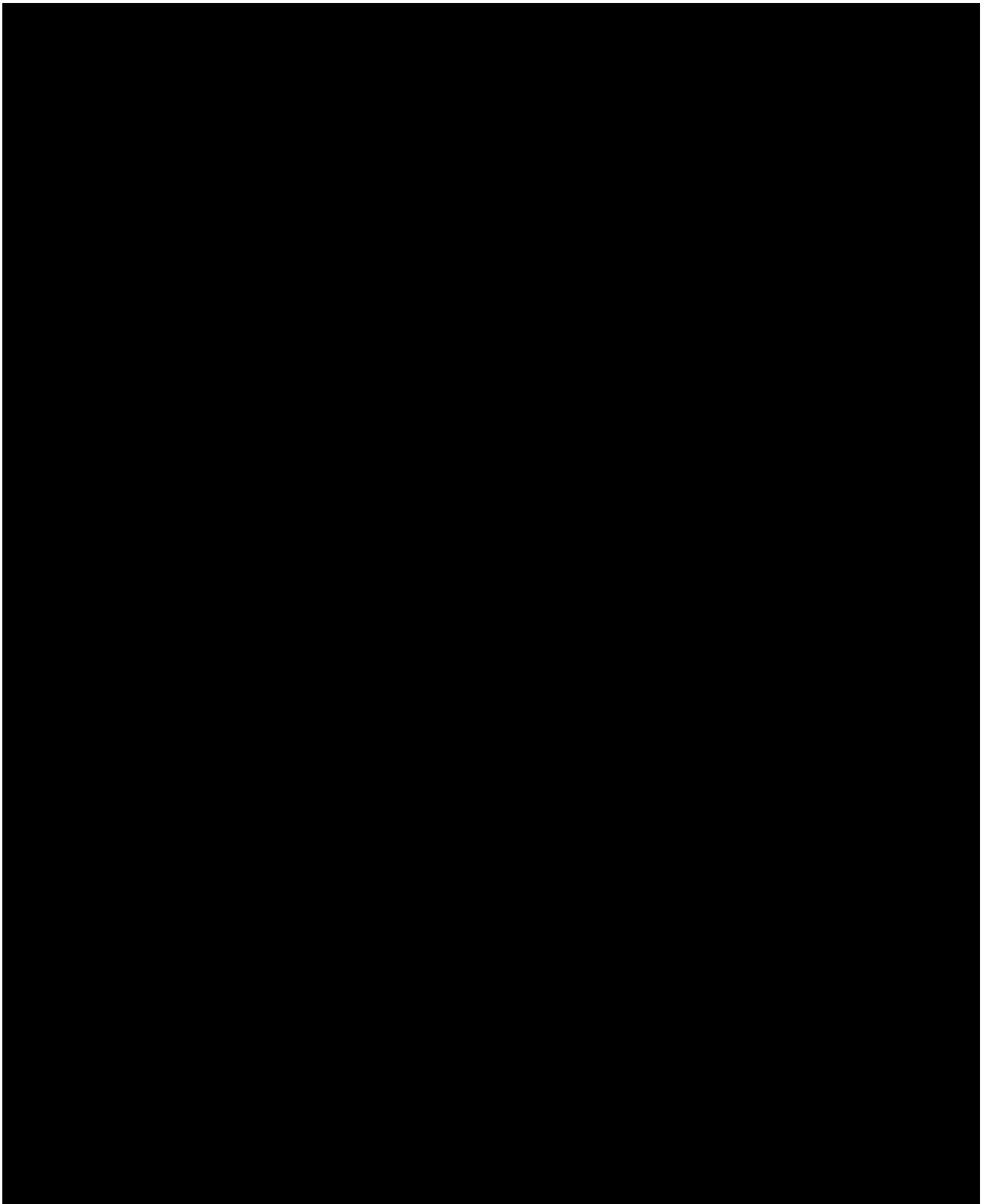
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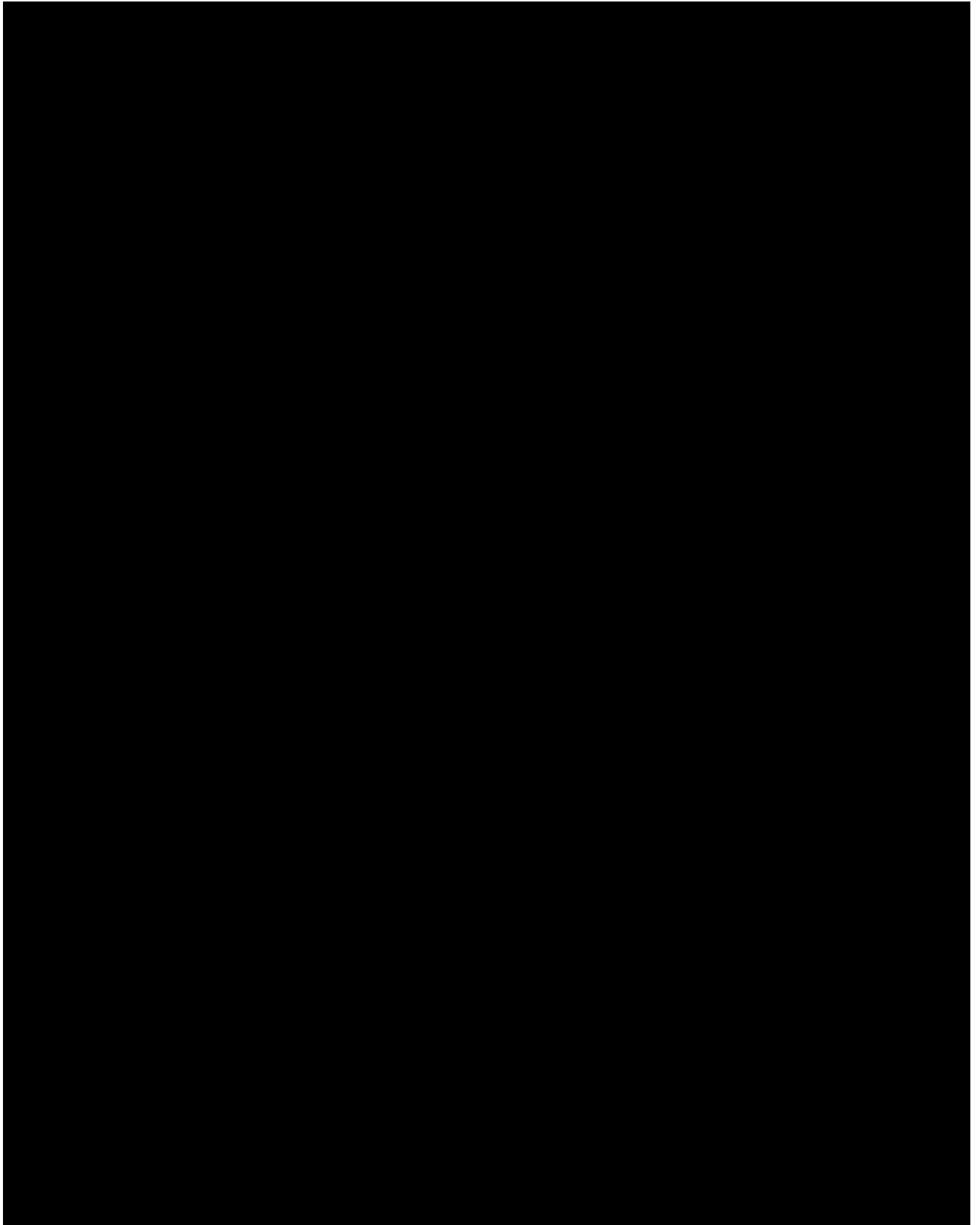
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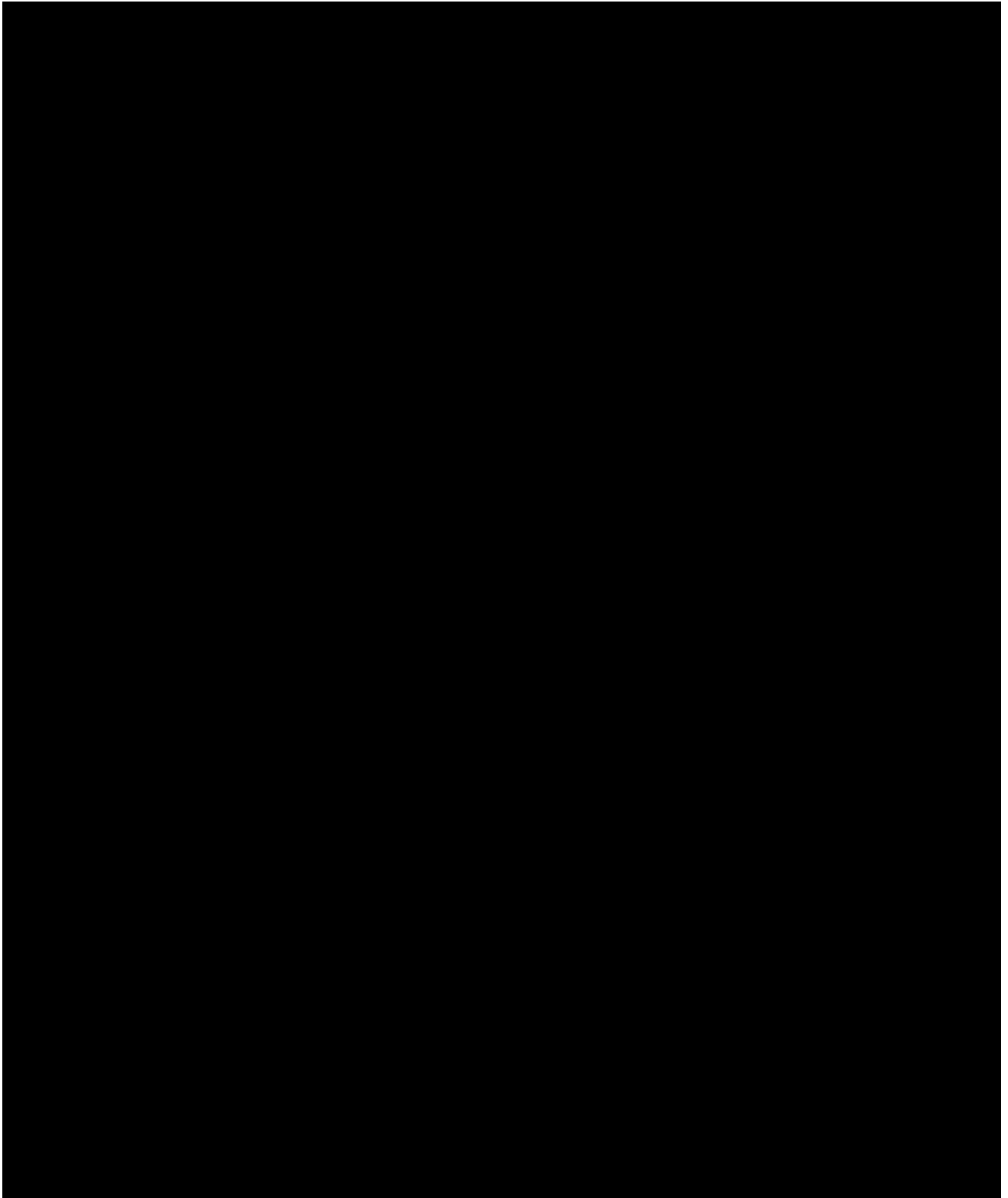
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c. Contract Terms

PG&E will only sell RA products using an Edison Energy Institute (EEI) enabling agreement and a PG&E RA confirmation agreement. Sale transactions of RA products will not be facilitated through a Western Systems Power Pool (WSPP) enabling agreement. Additionally, PG&E will not post collateral or performance assurance for any RA product sales.

d. Commercial Process

A series of horizontal black bars of varying lengths, some with small squares above them, representing a data visualization. The bars are arranged in a list-like structure, with some bars having small squares above them, possibly indicating a specific category or value. The bars are of different lengths, suggesting a range of data points. The small squares are positioned above the bars, possibly indicating a specific category or value. The bars are arranged in a list-like structure, with some bars having small squares above them, possibly indicating a specific category or value. The bars are of different lengths, suggesting a range of data points. The small squares are positioned above the bars, possibly indicating a specific category or value.



The table below outlines the schedule in which PG&E solicitations will be issued. Updates to the table will be posted to PG&E's website and submitted to the CPUC via Tier 1 Advice Letter, at least annually, which will cover delivery periods for the current and upcoming calendar years.

PG&E's RA SOLICITATION SCHEDULE

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Solicitation ⁵	Delivery Term ⁶	Products	Anticipated Date
Q4 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights RA Swaps	July/August 2020
Annual Multiyear (2021 – 2022)	Monthly, January through December (2021 – 2022)	System RA with/without Flexible RA Import Capacity Counting Rights Local RA with/without Flexible RA Import Capacity Counting Rights RA Swaps	Q3 2020 ⁷
February through Balance of Year 2021	Monthly, February through December 2021	System RA with/without Flexible RA Import Capacity Counting Right Local RA with/without Flexible RA Import Capacity Counting Right RA Swaps	November 2020
Q2 through Balance of Year 2021	Monthly, through December 2021	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights RA Swaps	January 2021
Q3 through Balance of Year 2021	Monthly, through December 2021	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights RA Swaps	April 2021
Q4 through Balance of Year 2021	Monthly, through December 2021	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights RA Swaps	July/August 2021
Annual (2022)	Monthly, January through December (2022)	System RA with/without Flexible RA Import Capacity Counting Rights Local RA with/without Flexible RA Import Capacity Counting Rights RA Swaps	Q3 2021 ⁸

⁵ If PG&E does not have available products to sell, PG&E will not issue a solicitation.

February through Balance of Year 2022	Monthly, February through December 2022	System RA with/without <u>Flexible RA</u> <u>Import Capacity Counting Right</u> Local RA with/without <u>Flexible RA</u> <u>Import Capacity Counting Right</u> <u>RA Swaps</u>	November 2021
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⁶ This table does not guarantee availability of product for the delivery period offered. Quantity is subject to meeting the requirements as described in this Appendix.

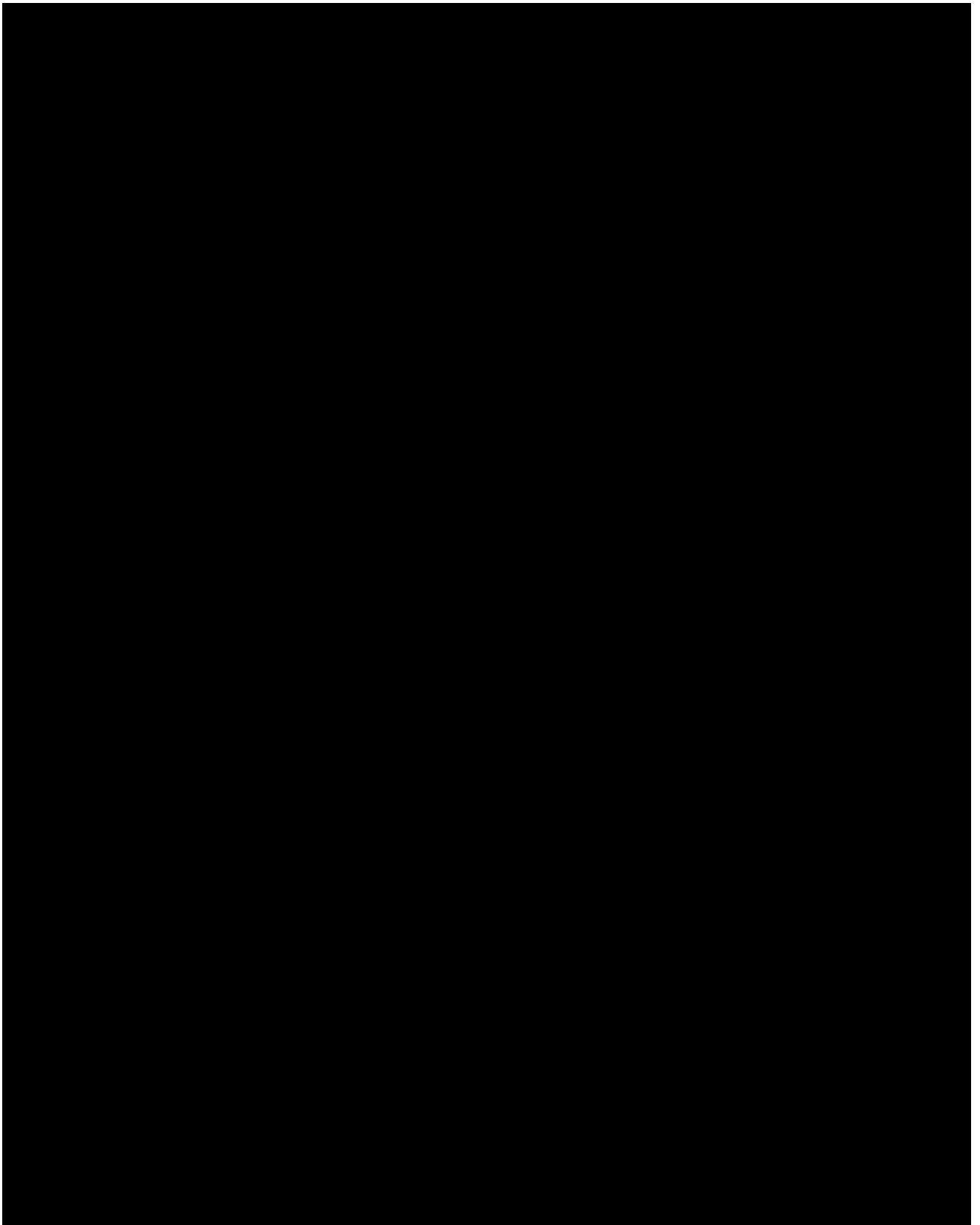
⁷ PG&E will issue at least one solicitation to cover the delivery term of 2021 and 2022 ~~three years~~ under the multiyear framework.

⁸ PG&E will issue at least one solicitation to cover the delivery term of 2021 and 2022 ~~three years~~ under the multiyear framework.



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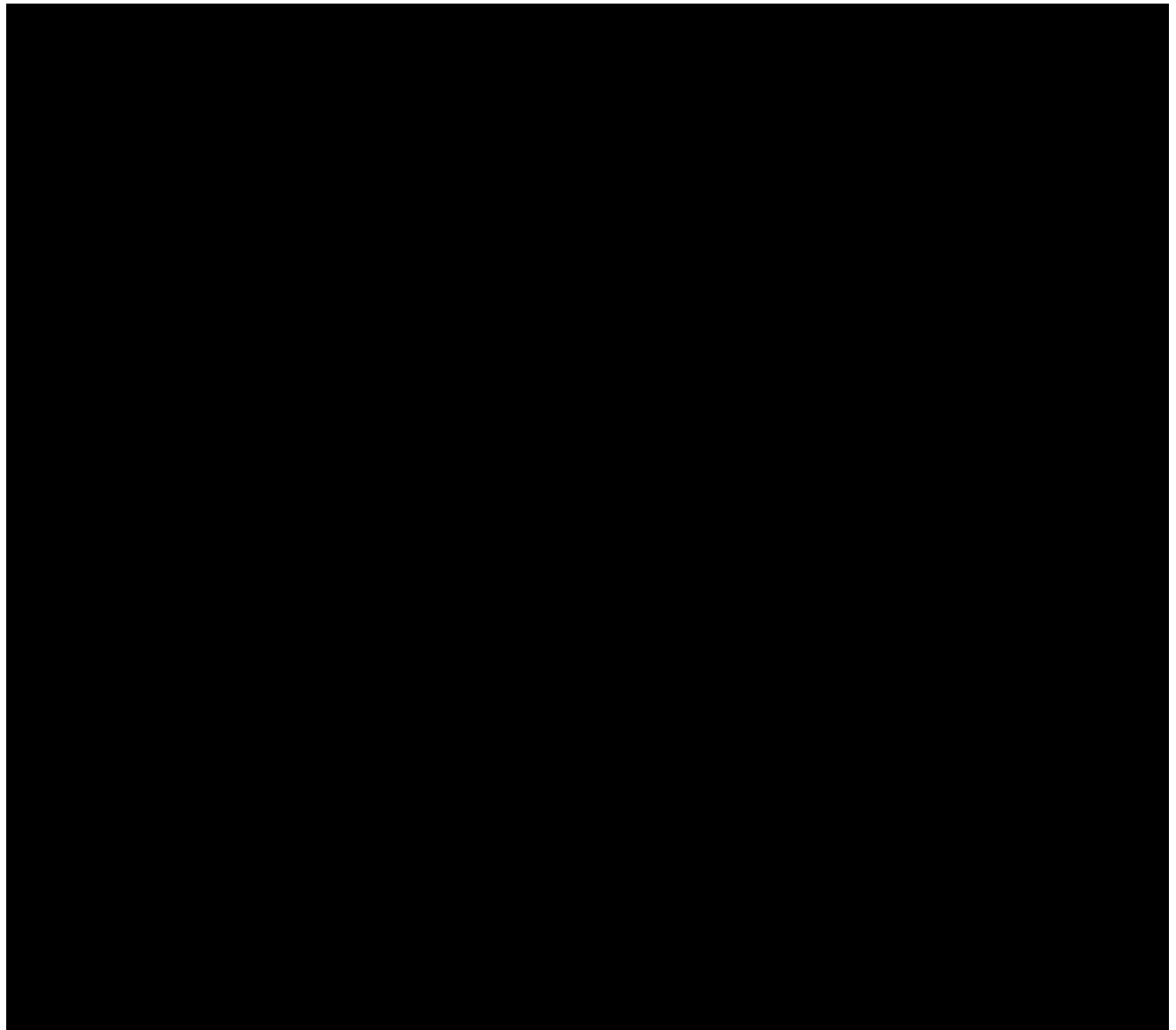
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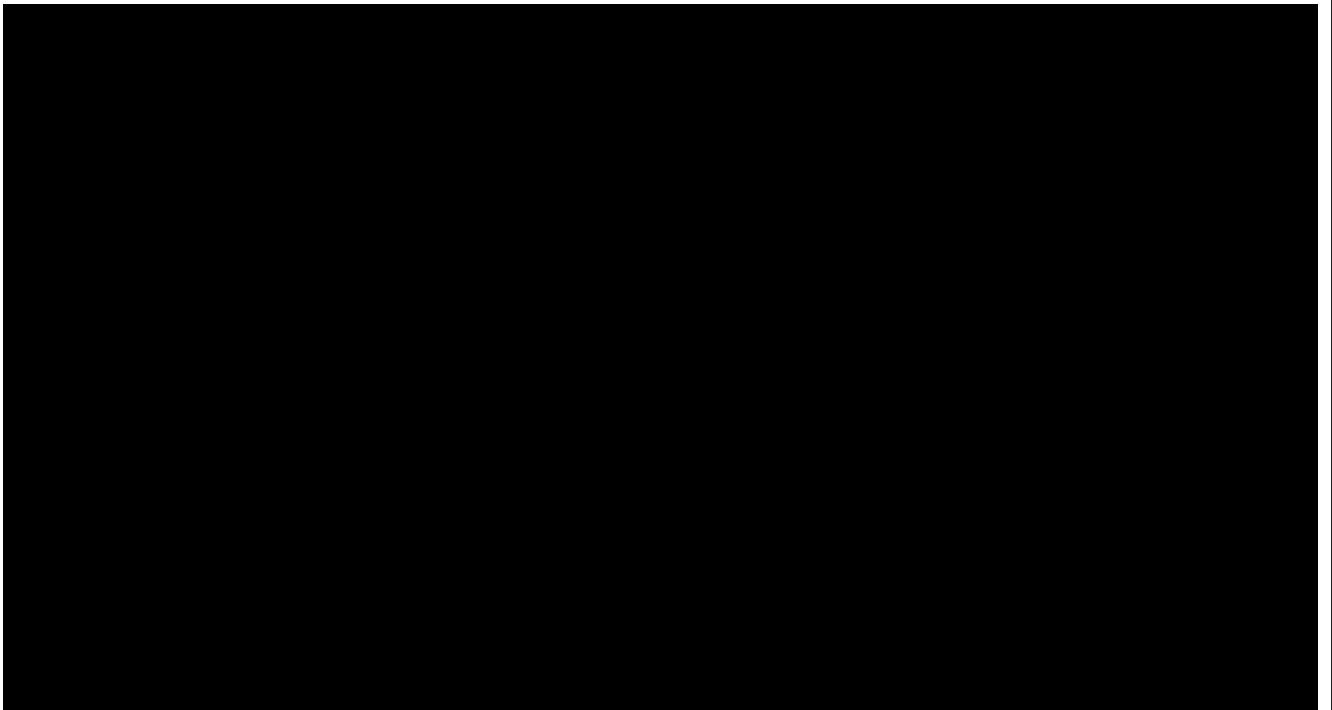
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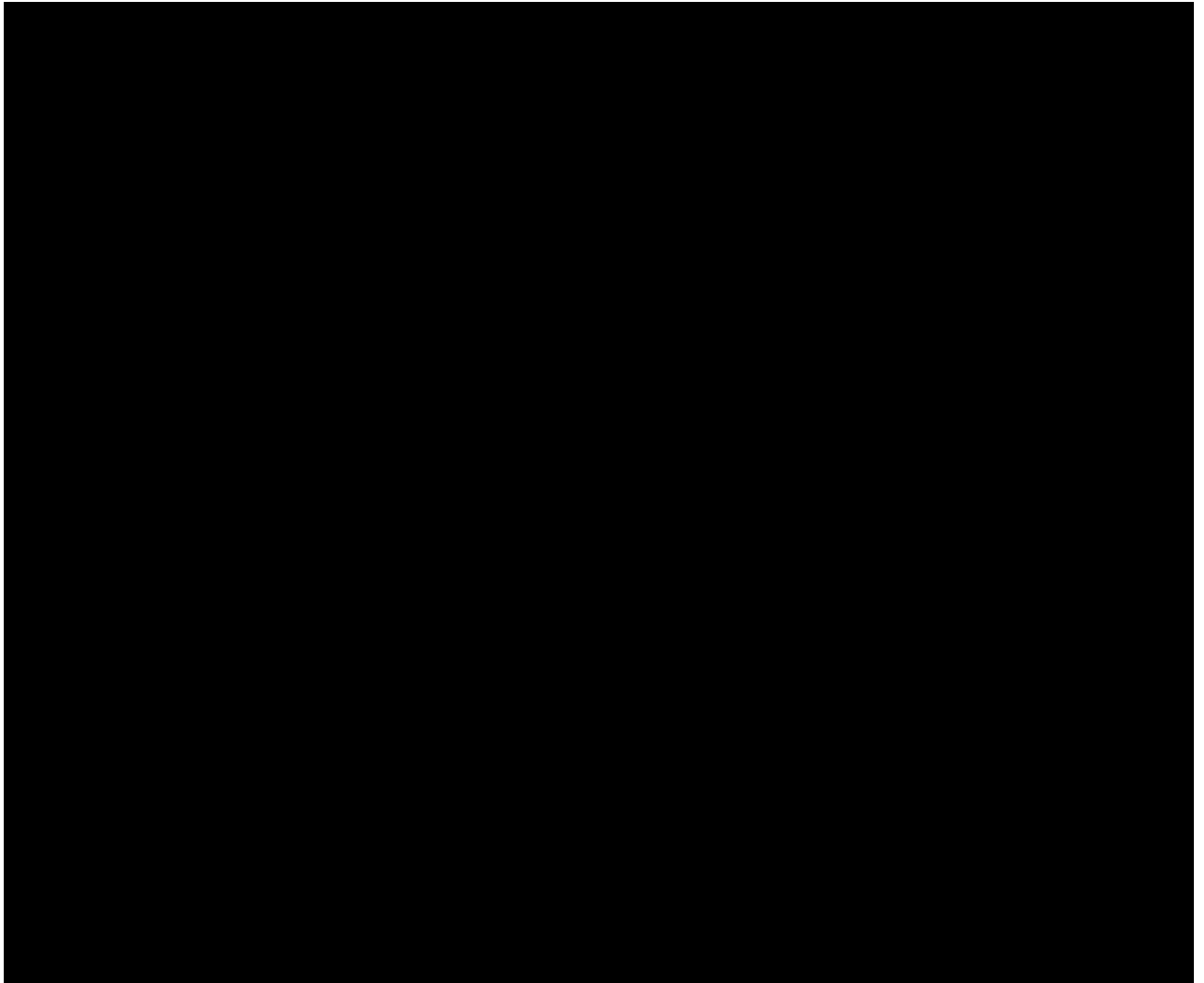
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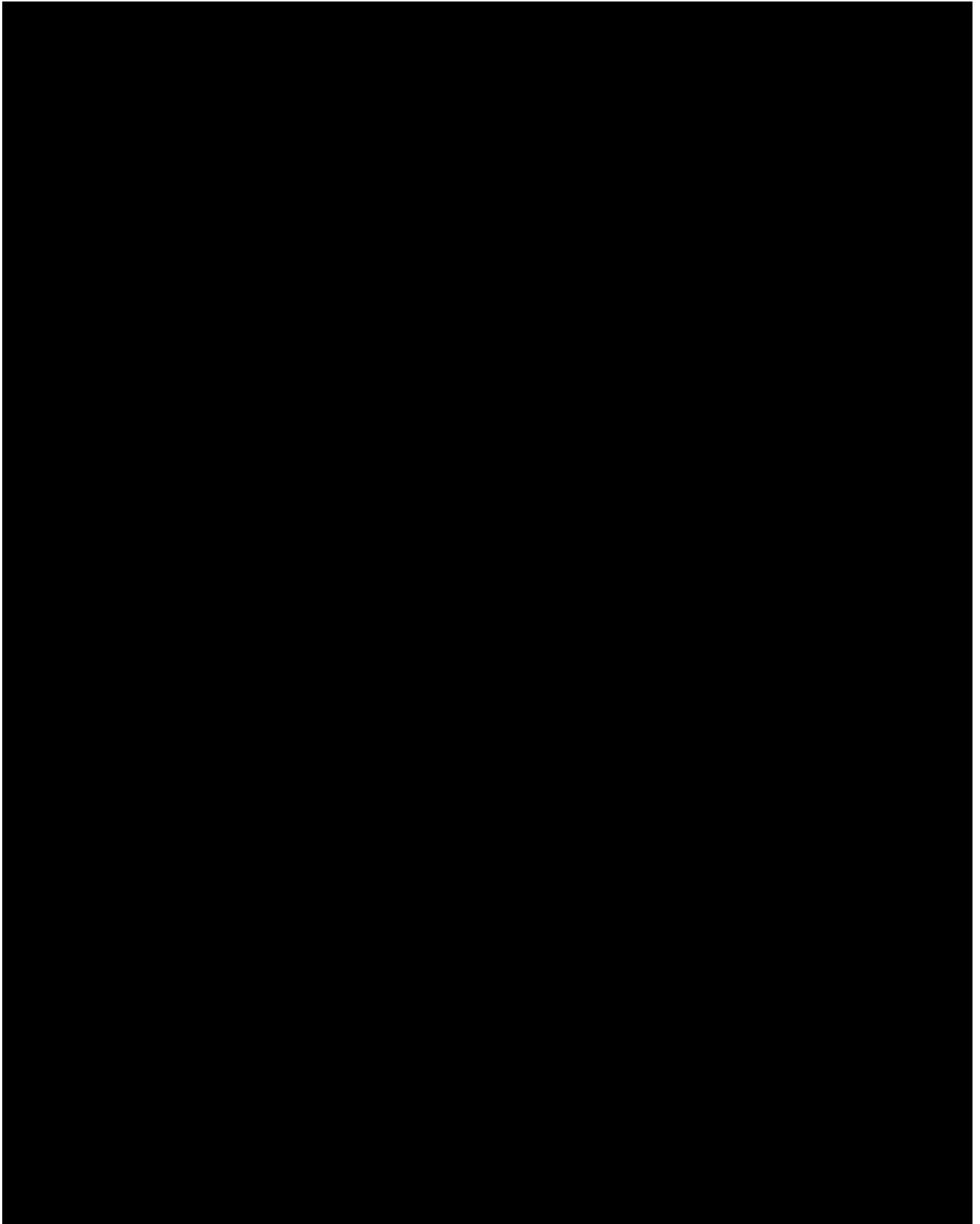
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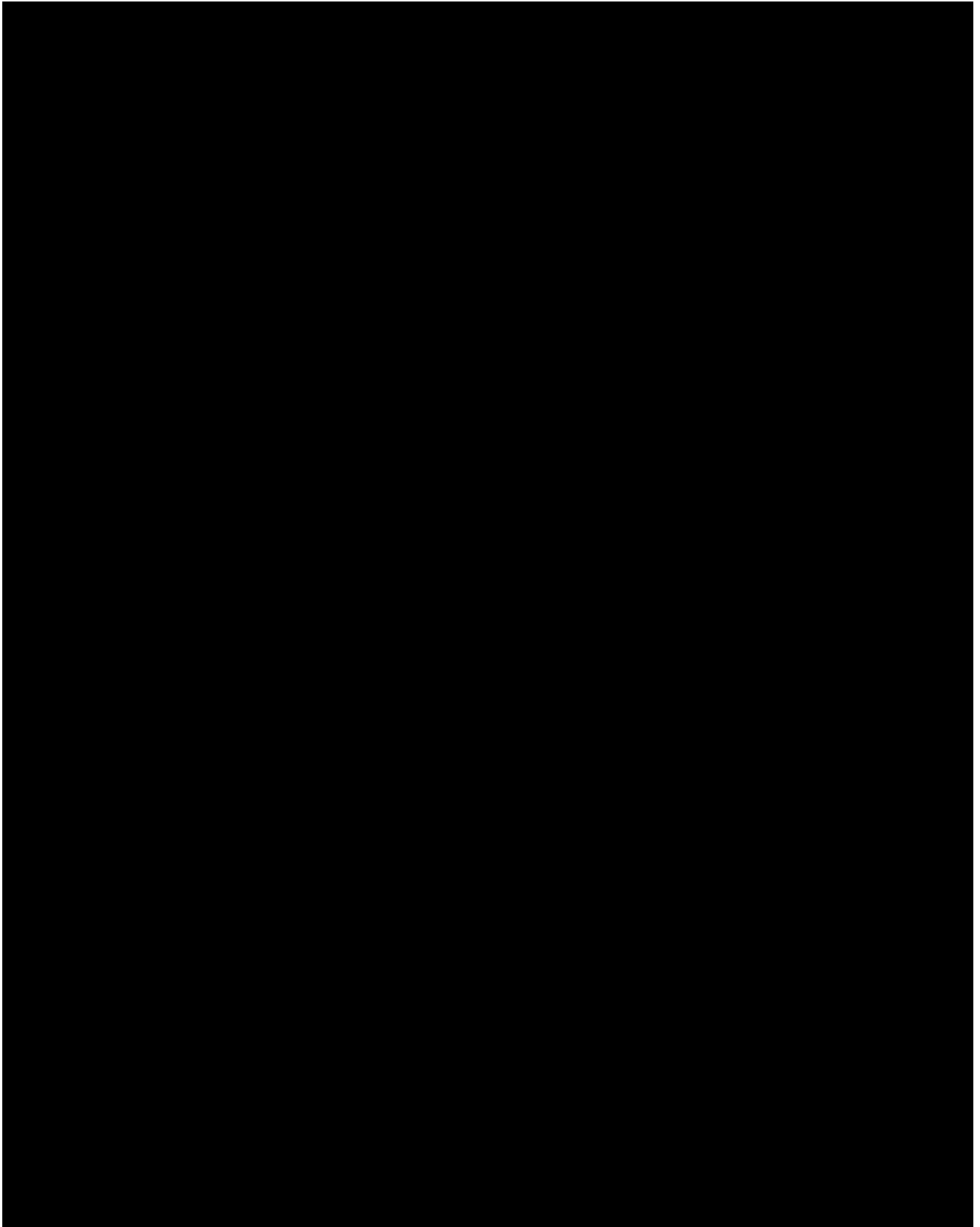
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PACIFIC GAS AND ELECTRIC COMPANY

Attachment D

PUBLIC

**Clean Version, BPP Sheet 41 (Appendix A),
BPP Sheets 49 and 56 (Appendix B), and BPP
Sheets 258-277 (Appendix S) (Public Version)**



Line No.	Product	Description	Initial Authorization
14	On-Site Energy or Capacity (Self-Generation on Customer Side of the Meter)	The amount of power measured in MW or MWh that can be generated downstream of the customer's electric meter that can be used to offset the customer's load served by the electric service provider.	D.02-10-062
15	Peak for Off-Peak Exchange	Electric energy, capacity, or A/S or transmission exchanged between counterparties measured in MW or MWh that is agreed to be supplied in an on-peak period in exchange for receiving an amount in an off-peak period. These transactions may also include an exchange of dollars.	D.02-10-062
16	Physical Call (or Put) Option	The right, but not the obligation, to buy or sell physical electricity for delivery on a specific date at a fixed or indexed price (strike). The right to buy is a call option, and the right to sell is a put option.	D.02-10-062
17	Real-Time (Purchase or Sale)	The amount of energy, measured in MWh supplied or received by the control area operator to balance an entity's load and supply.	D.02-10-062
18	Resource Adequacy ("RA") Product (Purchase or Sale)	A capacity product intended to meet RA obligations. RA products are non-standard products.	AL 2615-E AL 2897-E D.15-10-031
19	Seasonal Exchange	Electric energy, capacity, or A/S or transmission exchanged between counterparties measured in MW or MWh that is agreed to be supplied during one season or set of months in exchange for receiving an amount in another season or set of months. These transactions may also include an exchange of dollars.	D.02-10-062
20	Tolling Agreement	An agreement to provide (receive) gas in exchange for receiving (providing) electricity.	D.02-10-062 D.04-12-048
21	Emissions Credits Futures or Forwards	Credits or allowances for emissions that can be bought or sold in order to comply with emissions limits.	D.03-12-062
22	Forecast Insurance	A method for managing load forecast (volume and shape) risk.	D.03-12-062
23	Firm Transmission Rights ("FTR") Locational Swaps	Over-the-counter basis swaps associated with Firm Transmission Rights. Swaps are financially settled directly with a counterparty or may be financially cleared through financial clearinghouse.	D.03-12-062
24	Non-FTR Locational Swaps and Futures	Locational basis swaps or futures. Swaps are financially settled directly with a counterparty or may be cleared through a financial clearinghouse. Futures are traded on an exchange.	D.03-12-062
25	Weather Triggered Options	A method for managing temperature and other weather forecast risks.	D.03-12-062



may also initiate financial clearing with a clearing house such as NYMEX or the ICE. Brokers facilitate the trading of physical and financial products. Brokers, as part of their price discovery role, provide price reporting services to subscribing clients.

Buyers communicate bids to the broker. If a seller hits the bid, the trade is completed. If a seller does not hit the bid, the buyer can ask the broker to work its bid in the market. The broker will provide the buyer feedback if its bid is not hit by a seller. The buyer can adjust its bid until it is hit by a seller. Alternatively, if the buyer likes an offer communicated by the broker, the buyer can lift that offer to complete the trade. Since brokers facilitate trades of standard products and non-standard products and trading is anonymous, selection is made by product availability, credit availability and price. A list of brokers that PG&E is authorized to use is included in Appendix J.

c. CAISO Markets and Processes

Since April 2009, the CAISO has managed a Day-Ahead Market (“DAM”), also known as the Integrated Forward Market (“IFM”) and provided for Locational Marginal Pricing (“LMP”) at thousands of “nodes,” or points of injection and withdrawal of power on the transmission grid. Under the LMP framework, suppliers that bid into the DAM are paid based on a specific nodal price, while load serving entities (“LSE”) are charged based on an aggregation of nodal prices in each utility’s service territory, or Load Aggregation Points. The CAISO receives bids and offers from individual buyers and sellers, determines which supplies would be used to meet the needs (i.e., energy and ancillary services, while simultaneously addressing transmission congestion and transmission line losses) and sets market clearing prices for all transactions. Through its



**TABLE B-1
PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT PROCESSES AND METHODS**

Item #	Transaction Process	Description	Initial Authorization
1	Competitive Solicitations	Widely distributed request for offers or proposals. Required items include among other things: Description of product requirements, term, minimum and maximum bid quantities, scheduling and delivery attributes, credit requirements, and pricing attributes.	D.02-10-062 D.04-12-048 AL 2615-E D.07-12-052
2	Direct bilateral contracting with counterparties for short-term products (e.g., three months or less)	Bilateral process for products procured with a term three months or less. IOUs demonstrate that such transactions are reasonable based on available and relevant market data supporting the transaction. The demonstration may include showing competing price offers, result of market surveys, broker and online quotes, and/or other source of price information such as published indices, historical price information for similar time blocks, and comparison to RFOs completed within one month of the transaction.	D.02-10-062 D.04-12-048 AL 2615-E
3	Negotiated bilateral contracts for non-standard products which terms exceed three months provided that the IOUs include a product justification in quarterly compliance filings.	Process to purchase products provided they are included in quarterly compliance filings to justify the need and process in each case. Terms and conditions are benchmarked against the best available market information for similar products recently offered. Resource Adequacy ("RA") products are non-standard products.	D.03-12-062 D.04-12-048 AL 2615-E D.14-02-040 D.15-10-031
4	Inter-Utility Exchanges	Product exchange with other regulated utilities and other load-serving entities negotiated through private negotiation crafted to best fit the resources and needs of both parties.	D.02-10-062 D.04-12-048 AL 2615-E
5	ISO Markets and Processes: Imbalance Energy, Real-Time, Day-Ahead, Convergence Bids, and Capacity Procurement Mechanism including Competitive Solicitation Process	Spot market transactions are authorized to meet short-term needs. Convergence Bids are authorized to manage specific areas of portfolio risks and renewable scheduling limitations. Participation in the Capacity Procurement Mechanism and Competitive Solicitation Processes are authorized to meet CAISO backstop capacity needs.	D.02-10-062 D.04-12-048 AL 2615-E D.10-12-034 D.15-10-031
6	Transparent Exchanges, such as NYMEX and Intercontinental Exchange, Voice and On-Line Brokers	Electronic trading exchanges for transparent prices.	D.02-10-062 D.03-12-062 D.04-12-048 AL 2615-E
7	Renewables Portfolio Standard ("RPS")-Eligible Utility Ownership of Generation	Utility ownership of generation can be pursued through an RFO under certain conditions (see D.07-12-052 at 198-205; D.08-11-008 at 18-20) or outside of the RFO process under certain conditions (see D.07-12-052 at 209-213; D.08-11-008 at 20-23).	D.07-12-052 D.08-11-008



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APPENDIX S

SALES FRAMEWORK

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A. Introduction/Background

This Appendix describes the standards and criteria for Pacific Gas and Electric Company's (PG&E's) management and sales of Resource Adequacy (RA) Products and Import Capacity Counting Rights. Due to customer load departure, PG&E may encounter scenarios in which portfolio products exceed the requirements of the portfolio. In these situations, the Sales Framework guides actions PG&E will take. In addition, any transactions under this Sales Framework Appendix will be filed for approval through the Quarterly Compliance Reports (QCR), as required by the Bundled Procurement Plan (BPP).

B. Overview of Sales Framework

This section provides a description of the commercial processes and activities that PG&E will pursue to manage any sales of its portfolio of RA Products and Import Capacity Counting Rights. These processes and activities include: (1) product terms and volumes; (2) commercial processes; and (3) evaluation methodologies. As a result of Decision (D.) 20-06-002, PG&E will offer resource adequacy capacity from resources located in Local Reliability Areas¹ for delivery periods covering 2021 and 2022 to facilitate LSE compliance with the multiyear framework adopted in Decision (D.) 19-02-022.

¹ Local Reliability Areas refers to Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.



1. RA Product and Import Capacity Counting Right

■

[REDACTED]

■

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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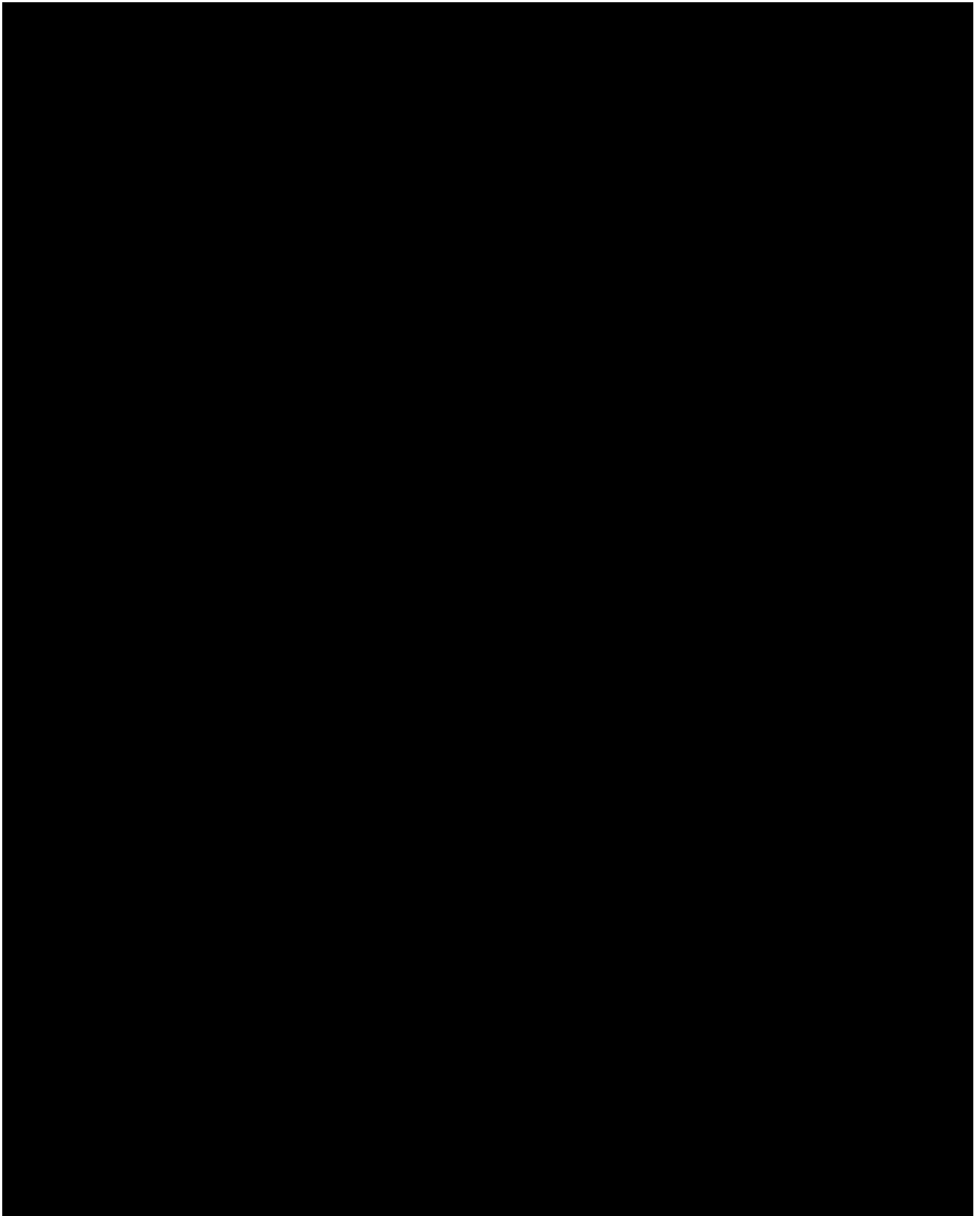
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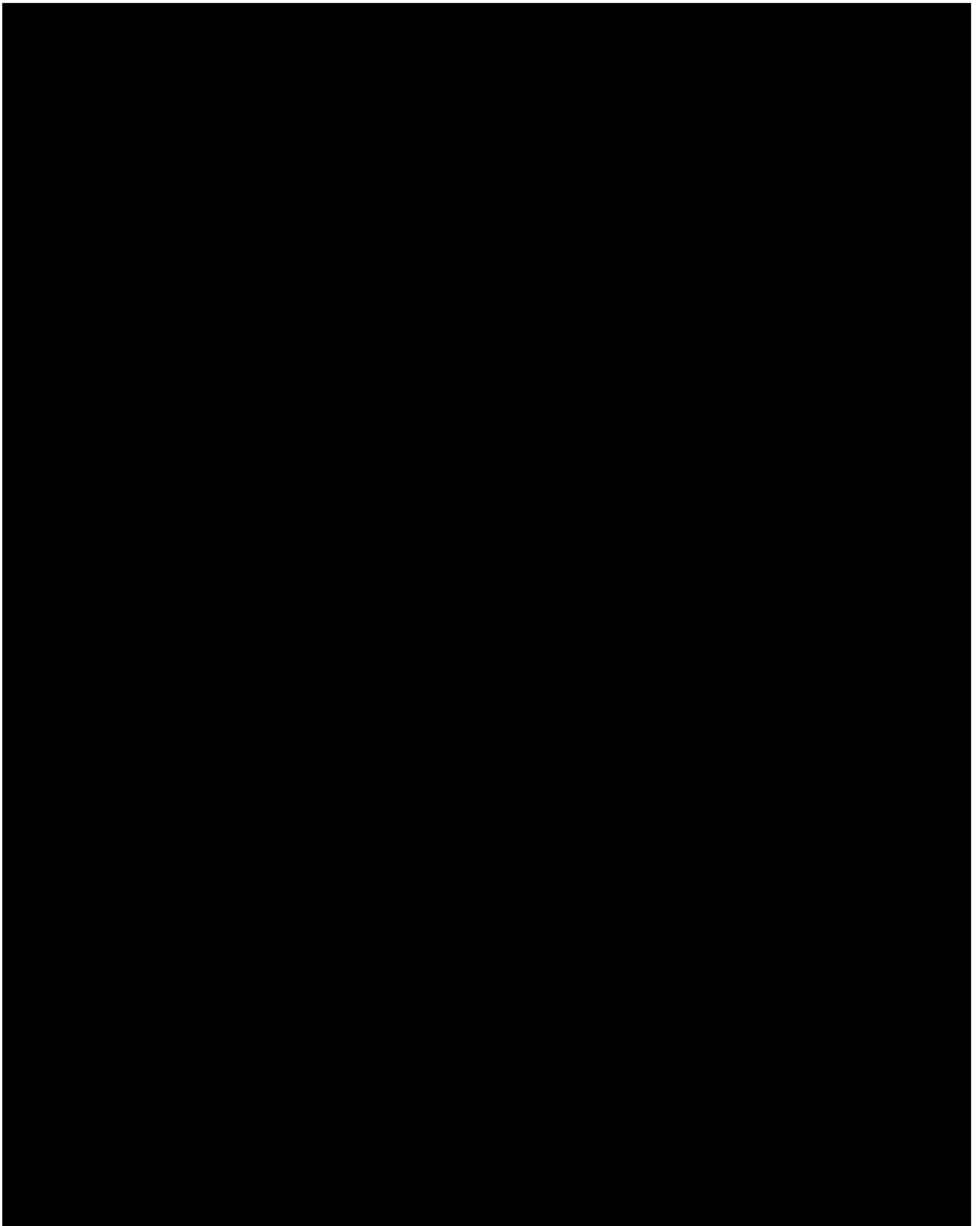
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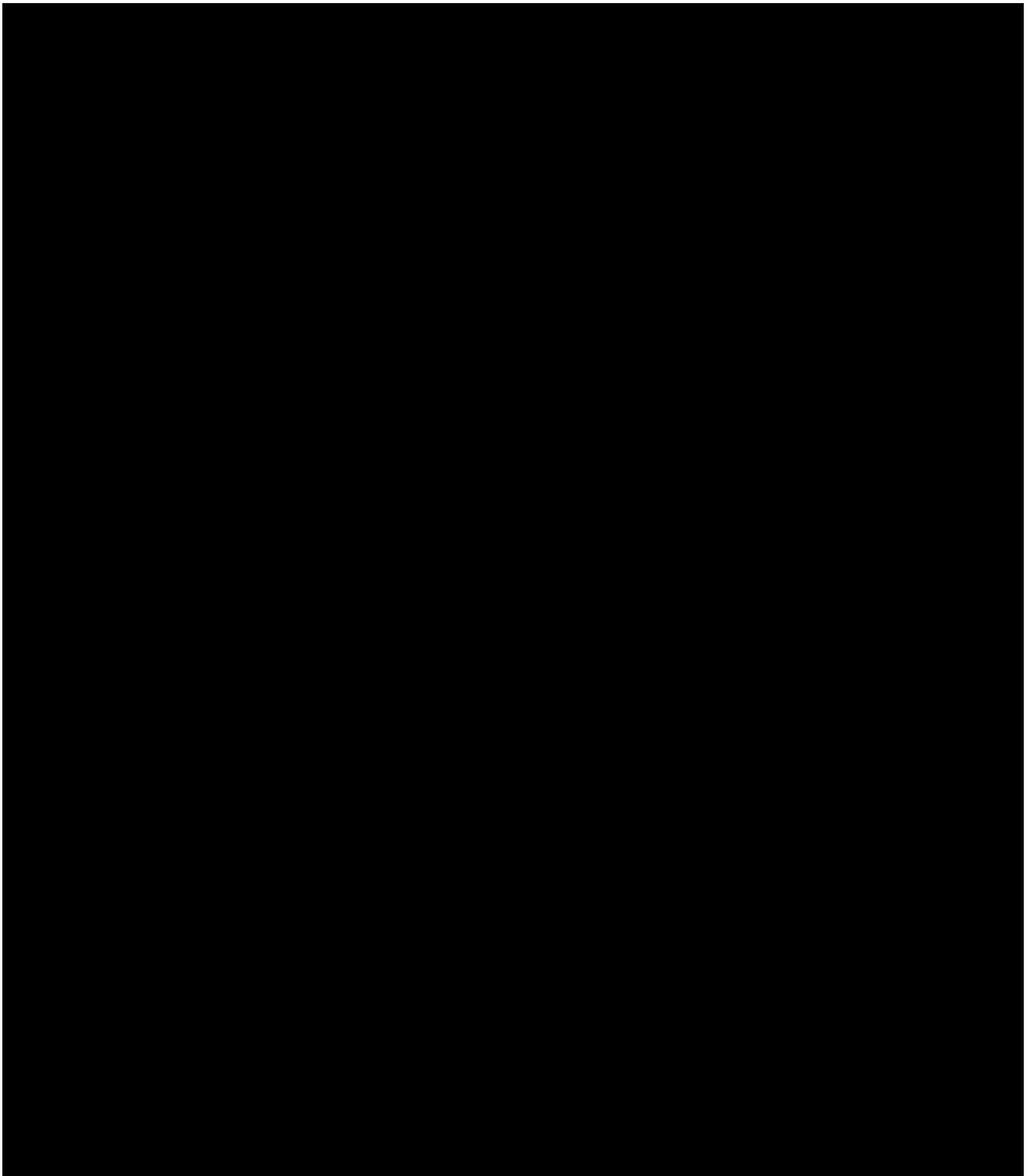
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⁴ Local Area refers to the separate Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.

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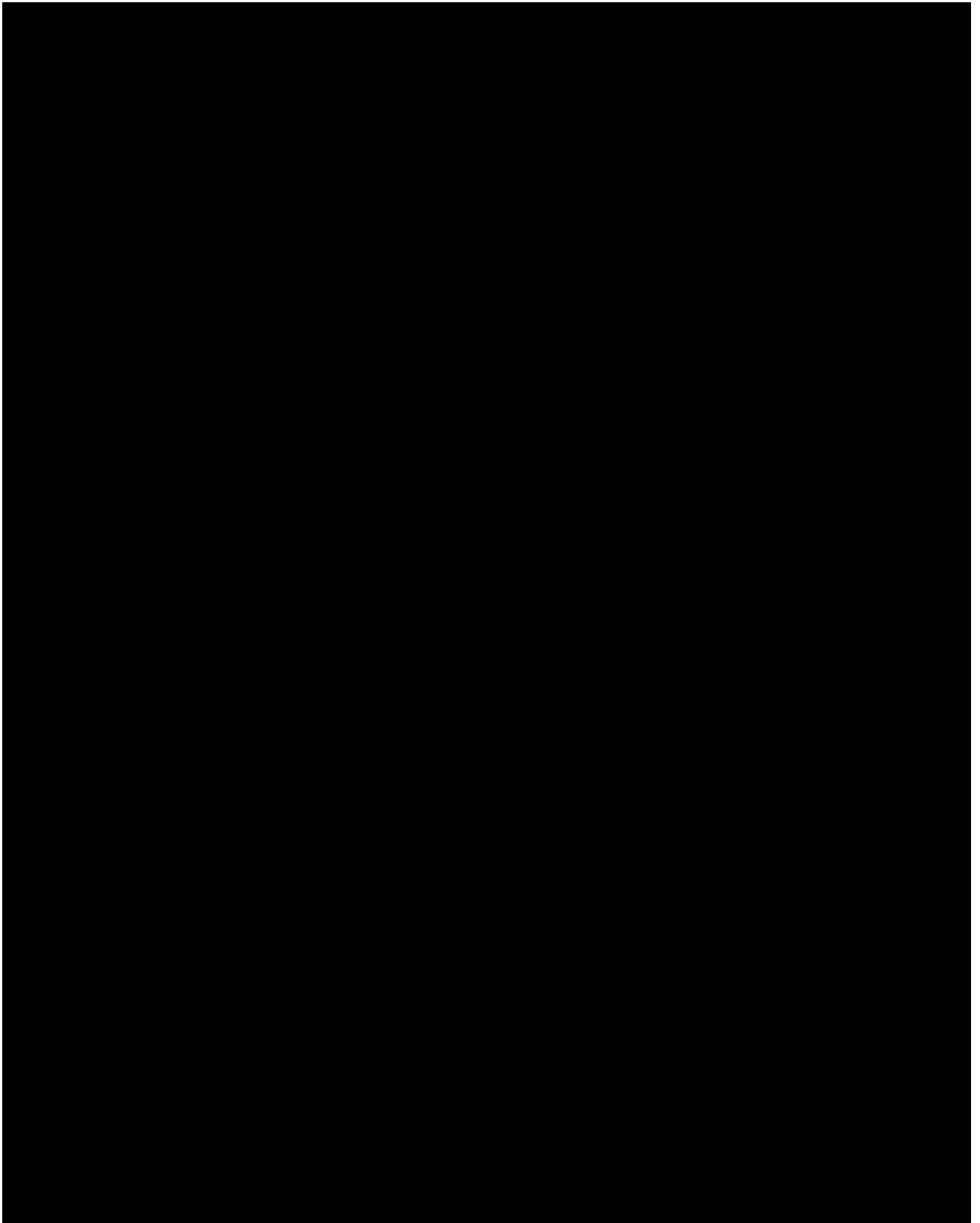
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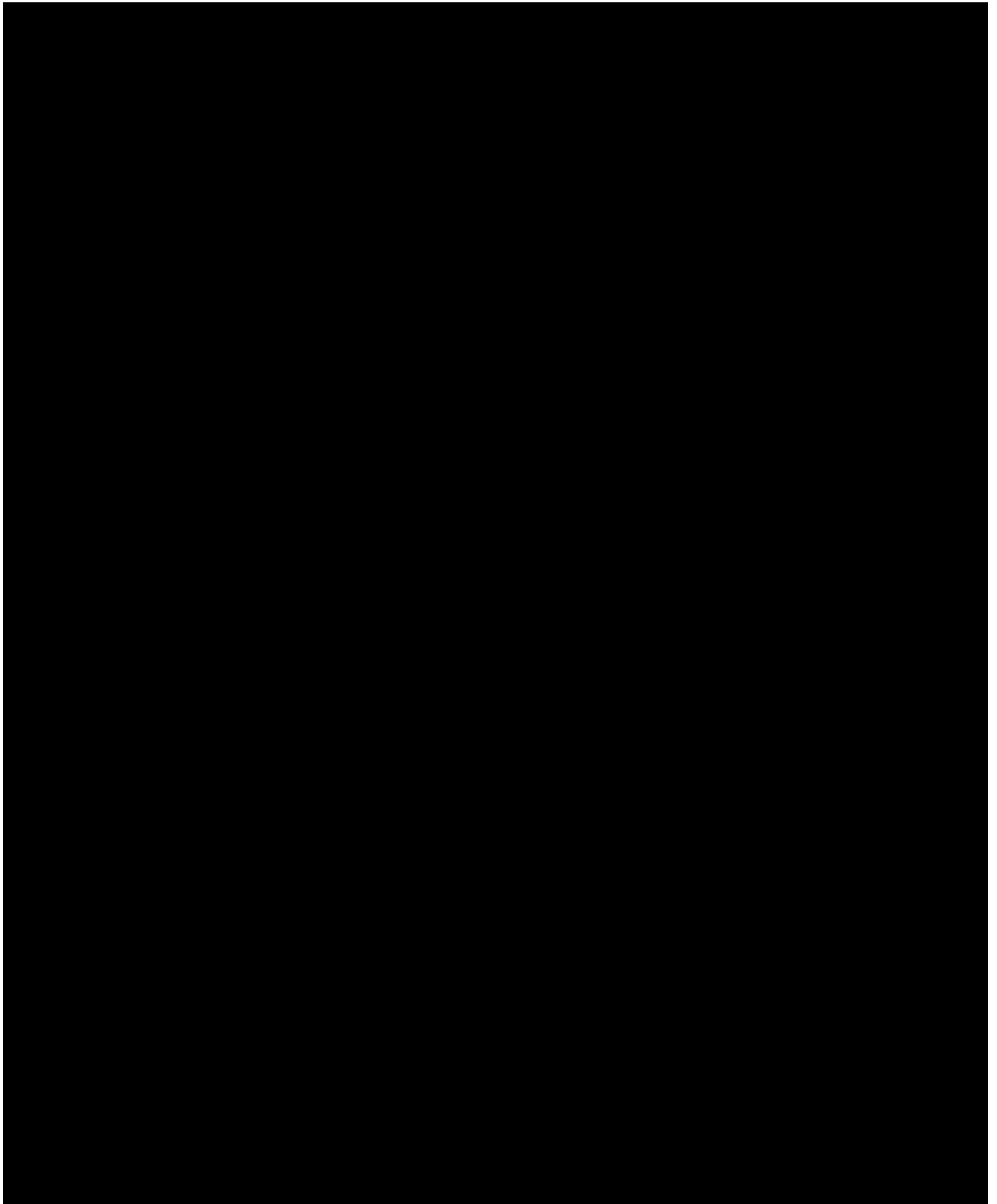
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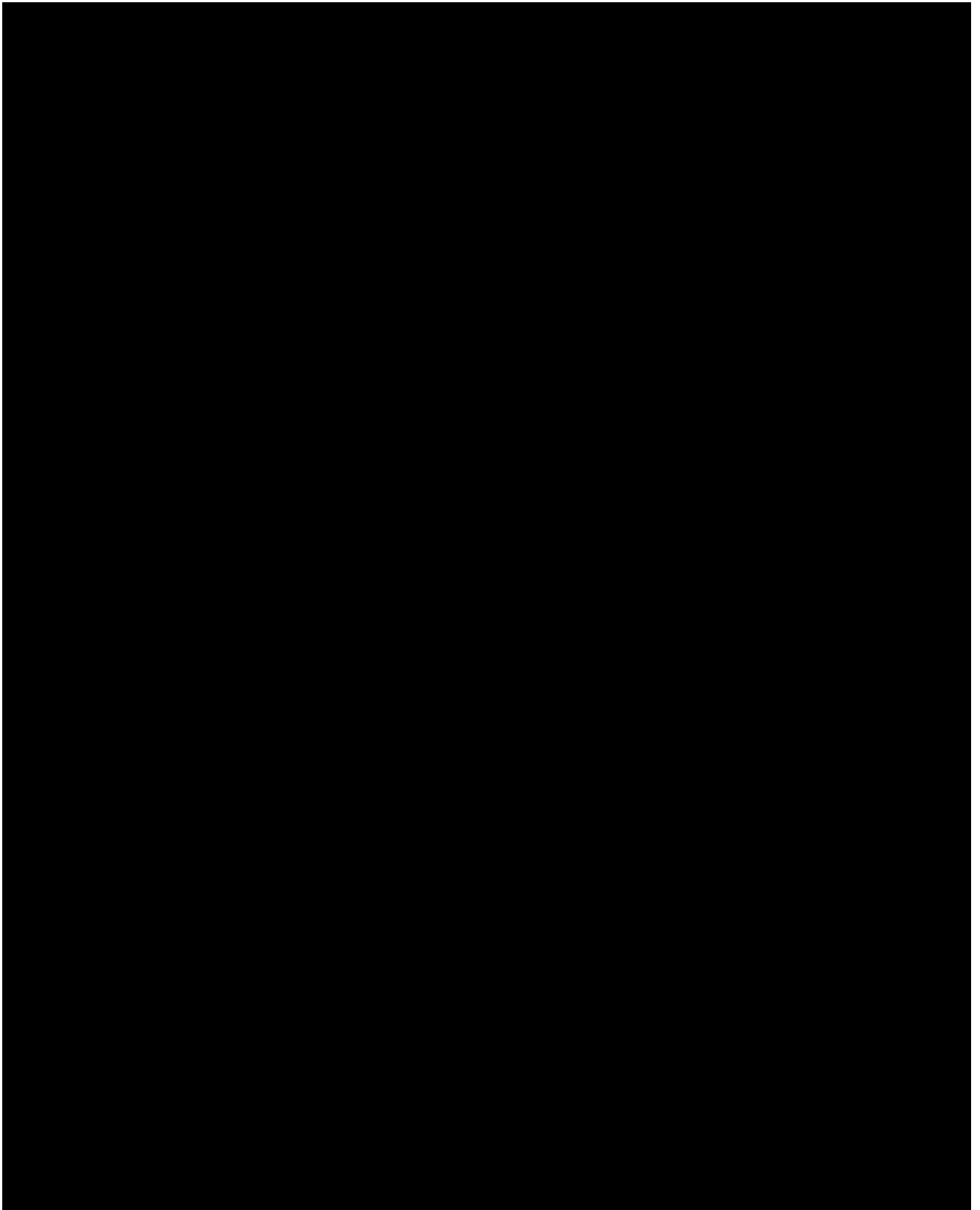
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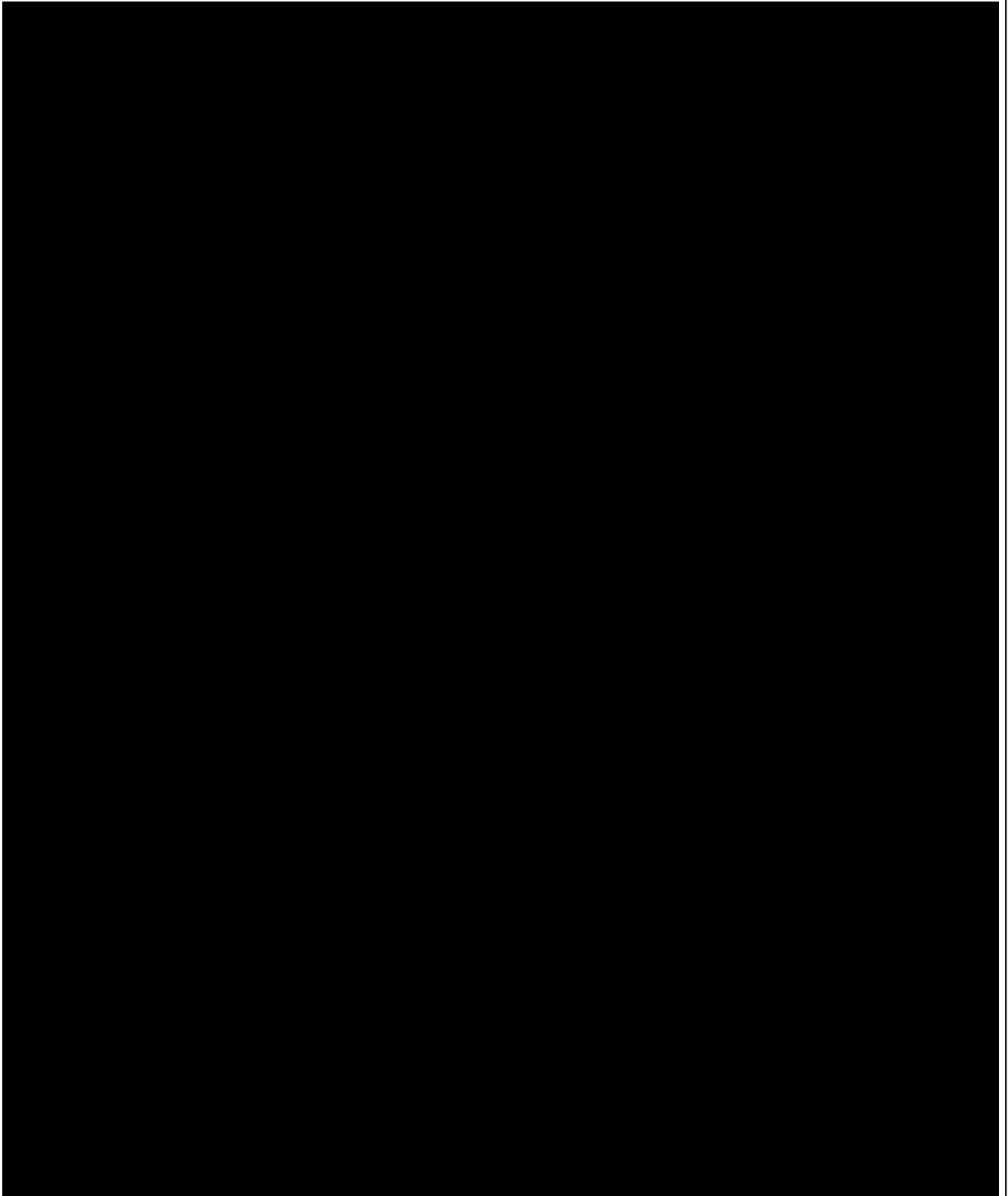
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c. Contract Terms

PG&E will only sell RA products using an Edison Energy Institute (EEI) enabling agreement and a PG&E RA confirmation agreement. Sale transactions of RA products will not be facilitated through a Western Systems Power Pool (WSPP) enabling agreement. Additionally, PG&E will not post collateral or performance assurance for any RA product sales.

d. Commercial Process

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The diagram consists of 12 horizontal black bars of varying lengths, arranged in a descending staircase pattern from top-left to bottom-right. The bars are as follows:

- Bar 1: Longest bar, starting at the left edge.
- Bar 2: Shorter than Bar 1, shifted to the right.
- Bar 3: Shorter than Bar 2, shifted further to the right.
- Bar 4: Shortest bar, shifted significantly to the right.
- Bar 5: Longer than Bar 4, starting further to the right.
- Bar 6: Longer than Bar 5, starting further to the right.
- Bar 7: Longer than Bar 6, starting further to the right.
- Bar 8: Longer than Bar 7, starting further to the right.
- Bar 9: Longer than Bar 8, starting further to the right.
- Bar 10: Longer than Bar 9, starting further to the right.
- Bar 11: Longer than Bar 10, starting further to the right.
- Bar 12: Shortest bar, starting further to the right.

The table below outlines the schedule in which PG&E solicitations will be issued. Updates to the table will be posted to PG&E’s website and submitted to the CPUC via Tier 1 Advice Letter, at least annually, which will cover delivery periods for the current and upcoming calendar years.

PG&E's RA SOLICITATION SCHEDULE



Solicitation ⁵	Delivery Term ⁶	Products	Anticipated Date
Q4 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	July/August 2020
Annual Multiyear (2021 – 2022)	Monthly, January through December (2021 – 2022)	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	Q3 2020 ⁷
February through Balance of Year 2021	Monthly, February through December 2021	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Right	November 2020
Q2 through Balance of Year 2021	Monthly, through December 2021	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	January 2021
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Q4 through Balance of Year 2021	Monthly, through December 2021	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	July/August 2021
Annual (2022)	Monthly, January through December (2022)	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	Q3 2021 ⁸
February through Balance of Year 2022	Monthly, February through December 2022	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Right	November 2021

⁵ If PG&E does not have available products to sell, PG&E will not issue a solicitation.

⁶ This table does not guarantee availability of product for the delivery period offered. Quantity is subject to meeting the requirements as described in this Appendix.

⁷ PG&E will issue at least one solicitation to cover the delivery term of 2021 and 2022 under the multiyear framework.

⁸ PG&E will issue at least one solicitation to cover the delivery term of 2021 and 2022 under the multiyear framework.

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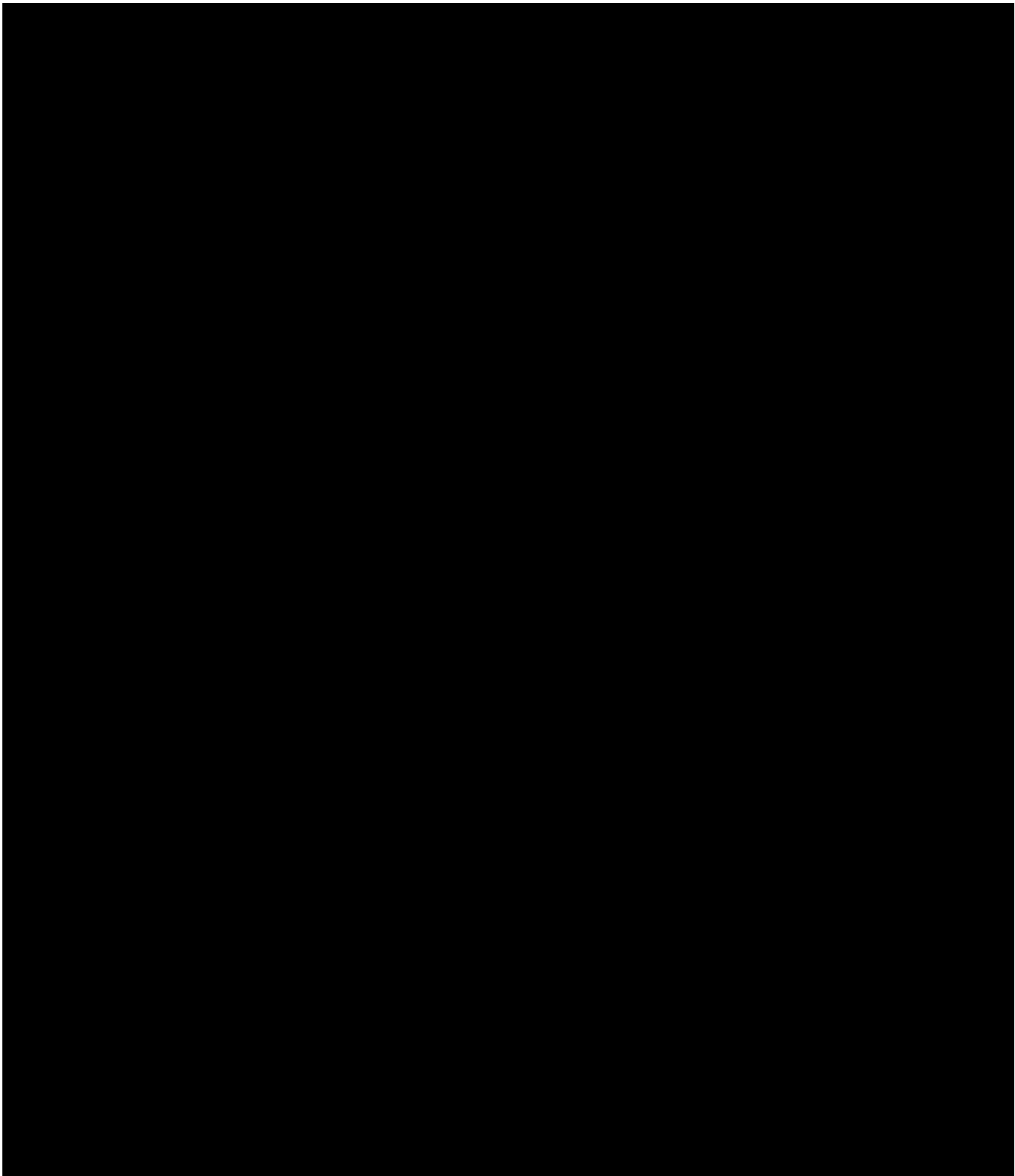
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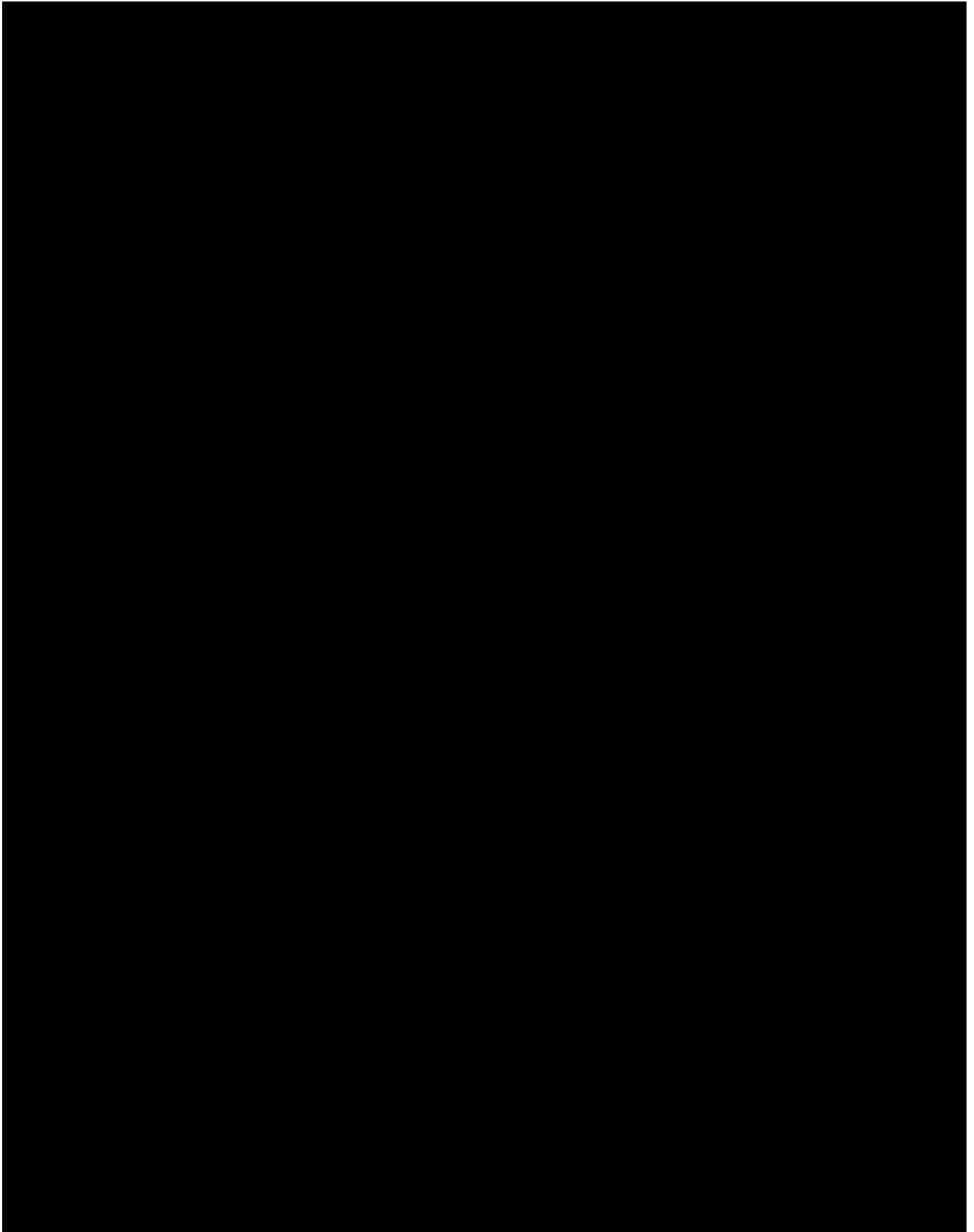
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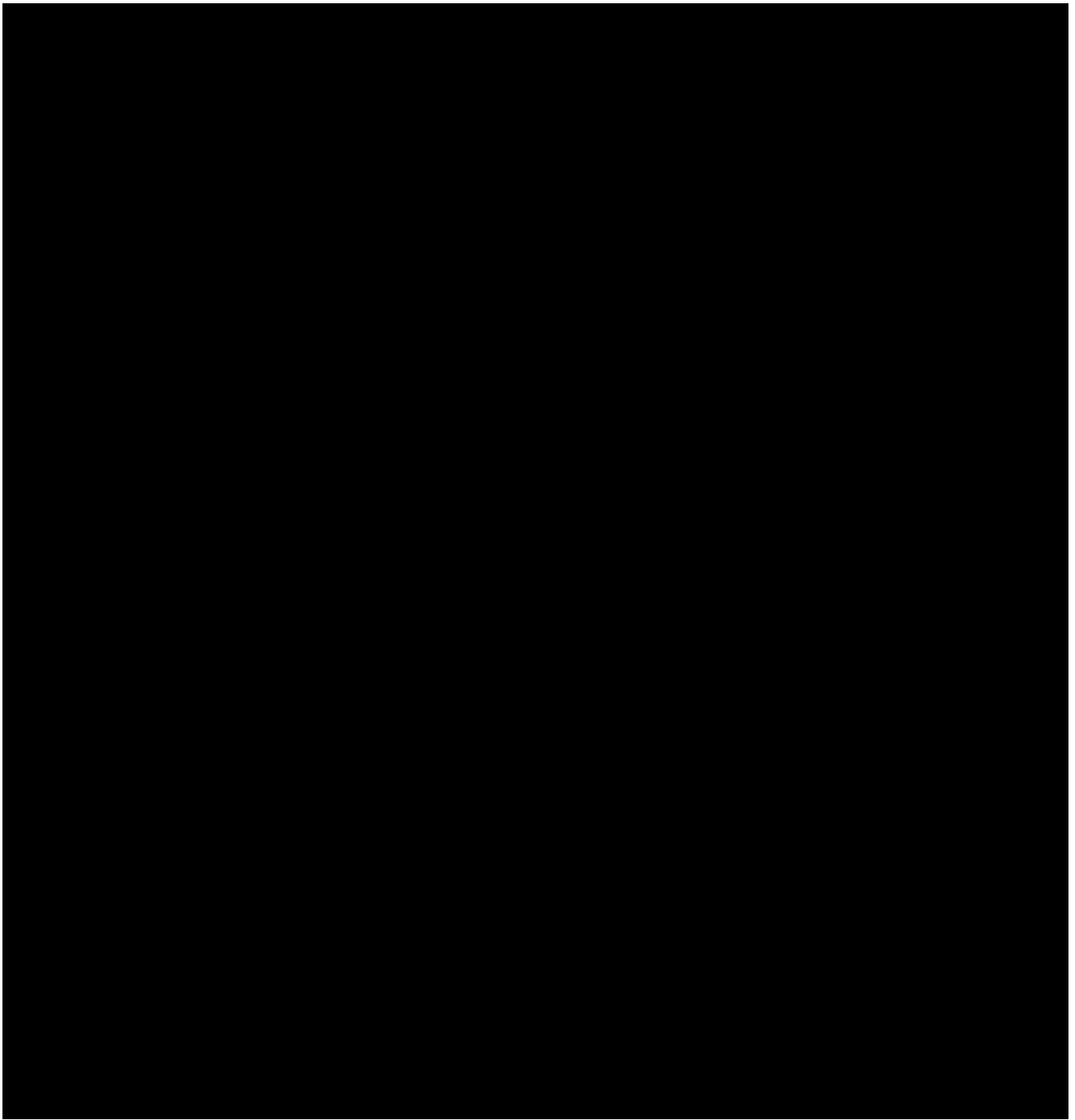
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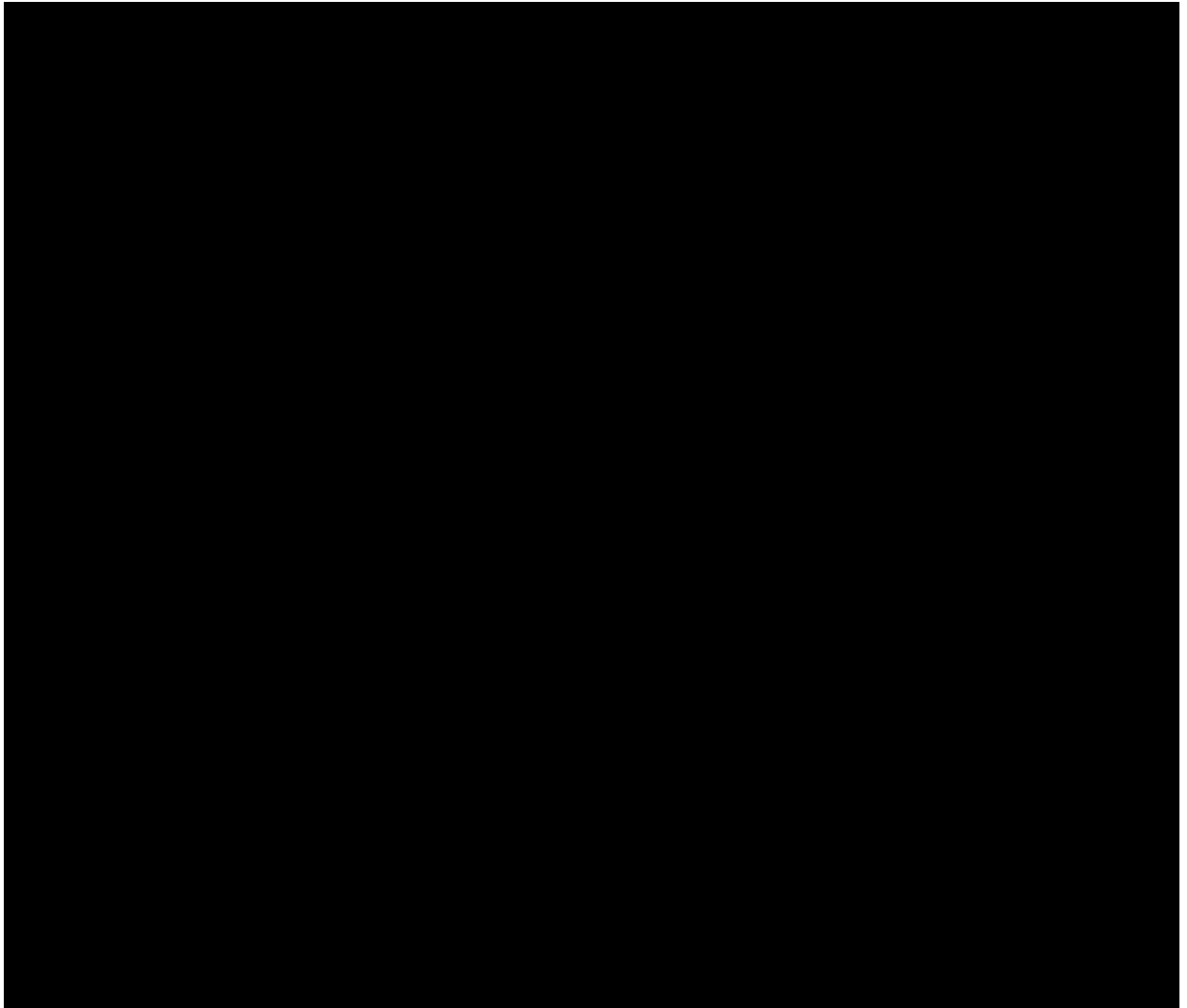
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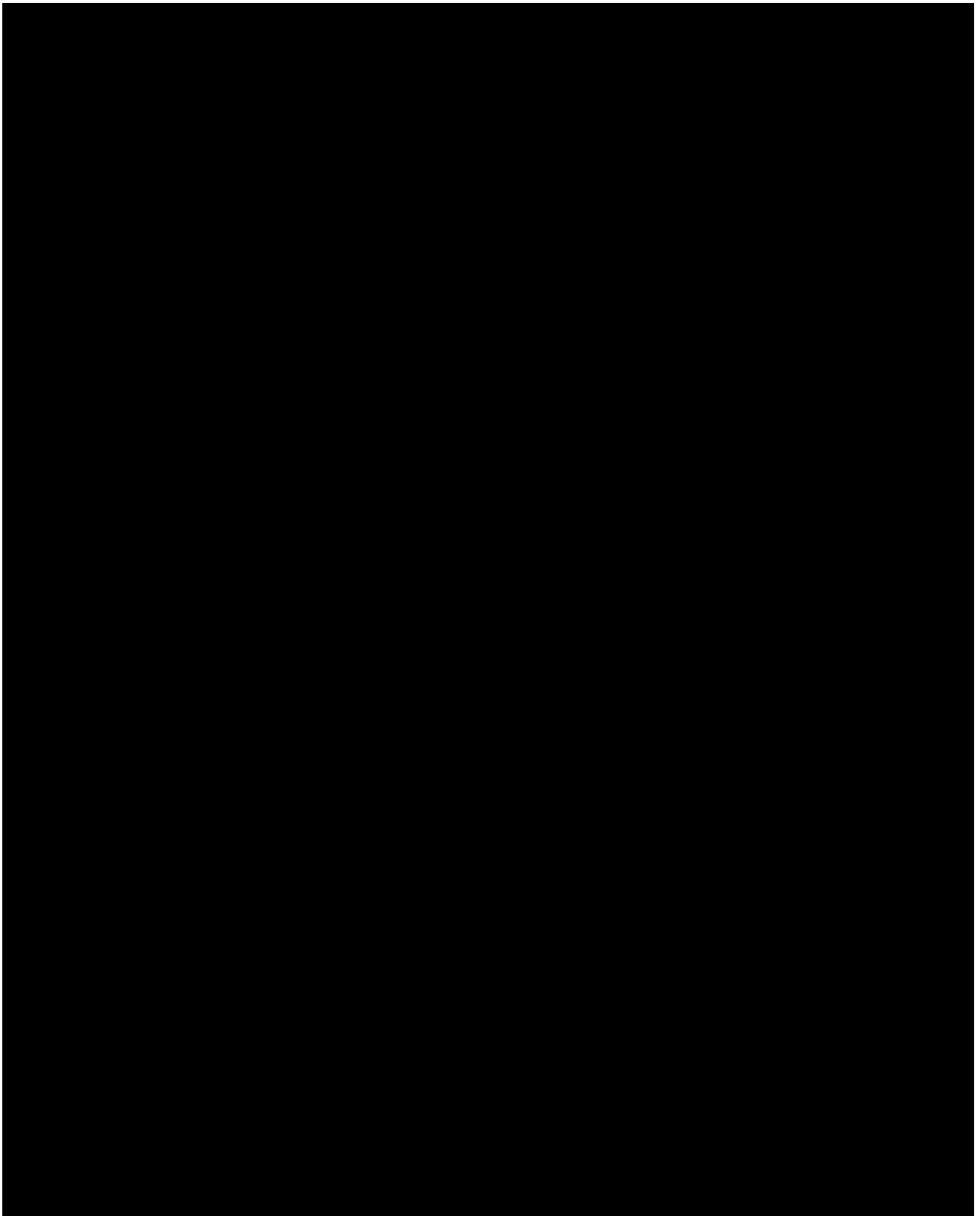
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2014 Bundled Procurement Plan



Decision No. _____

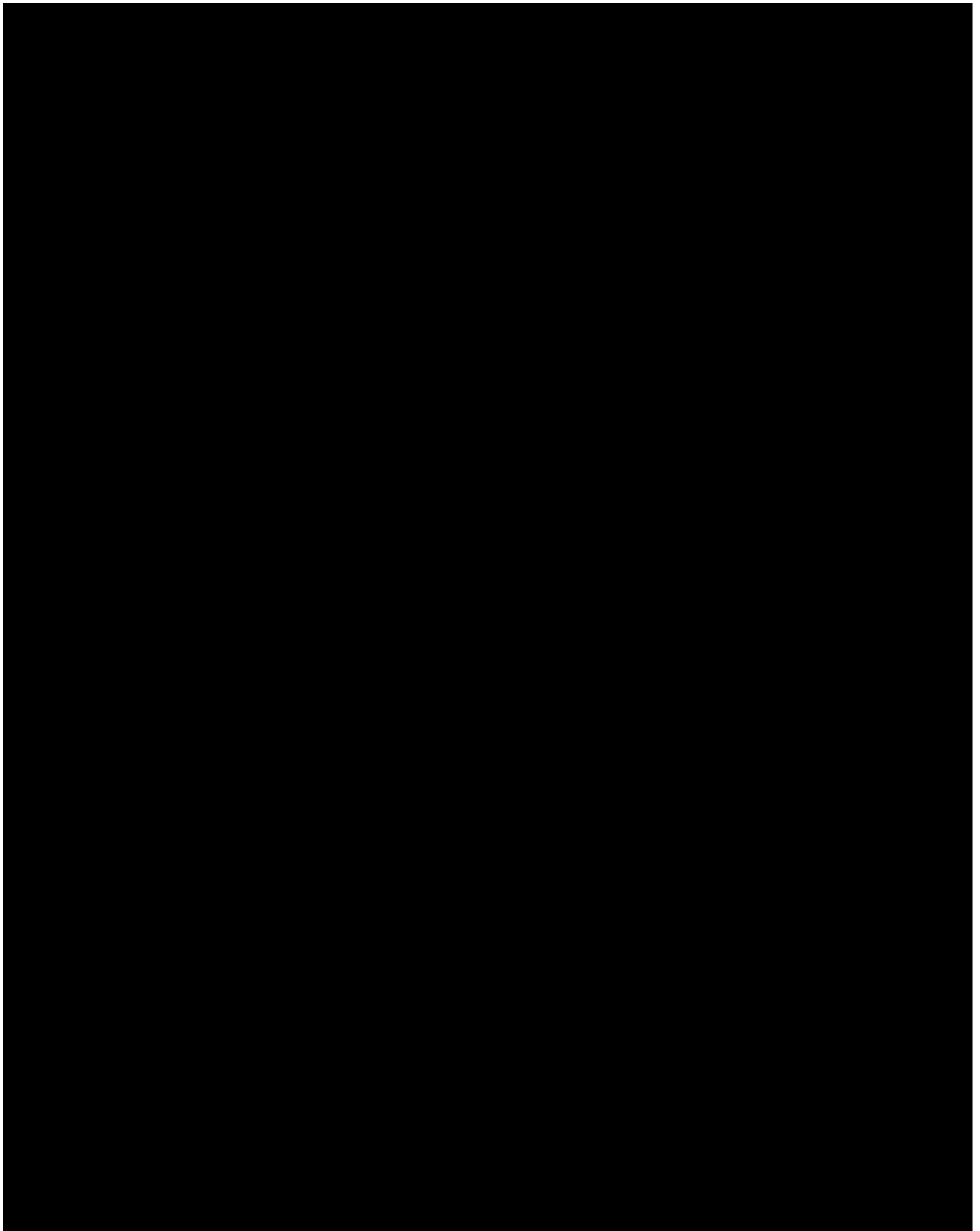
Issued by
Robert Kenney
Vice President
Regulatory and External Affairs

Date Filed _____
Effective _____
Resolution No. _____



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No. 276
Pacific Gas and Electric Company
2014 Bundled Procurement Plan



Decision No. _____

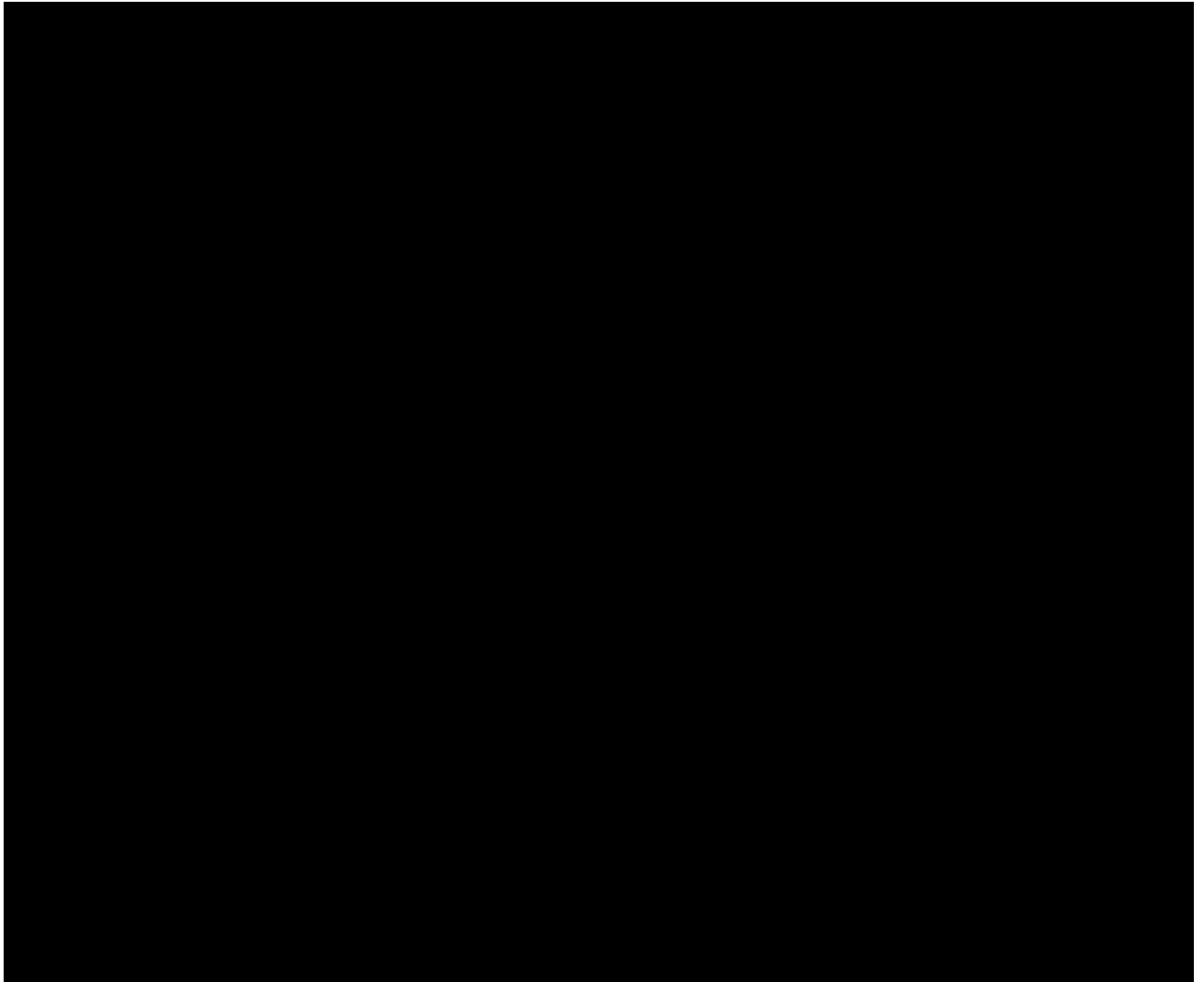
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PACIFIC GAS AND ELECTRIC COMPANY

Attachment E

Declaration of Scott Ranzal Seeking Confidential Treatment Pursuant to D.06-06-066, D.14-10-033, and Public Utilities Code §454.5(g)

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

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF SCOTT RANZAL
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION CONTAINED
IN ADVICE LETTER 5905-E**

I, Scott Ranzal, declare:

1. I am a Director in the Portfolio Management Policy department in the Energy Policy and Procurement organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include overseeing portfolio management activities for PG&E's procurement activities. 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 procurement information.
2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in PG&E's Advice Letter 5905-E.
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 procurement data and information covered by D.06-06-066. 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 the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on August 5, 2020 at San Francisco, California.

/s/

SCOTT RANZAL

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ADVICE LETTER 5905-E
August 5, 2020

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 Data To Be Kept Confidential
Confidential Attachments A and B – Appendix S	Pub. Util. Code§454.5(g)	This information includes PG&E’s confidential sales framework. Any discussion of PG&E’s sales strategies is market sensitive, because it will impact market participants’ bidding behavior for market products. Disclosure of this information could cause harm to PG&E’s customers and put PG&E at an unfair business advantage through non-competitive sales results.	Indefinite

**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	