

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4290G/5907E
As of September 10, 2020

Subject: Notification of Addition of New Event to Wildfire Expense Memorandum Account

Division Assigned: Energy

Date Filed: 08-07-2020

Date to Calendar: 08-12-2020

Authorizing Documents: D1806029

Disposition:	Accepted
Effective Date:	08-07-2020

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

August 7, 2020

Advice 4290-G/5907-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Notification of Addition of New Event to Wildfire Expense Memorandum Account**Purpose**

As directed by the California Public Utilities Commission (Commission or CPUC) in Decision (D.) 18-06-029, Pacific Gas and Electric Company (PG&E) submits this Tier 1 advice letter to add the 2018 Camp Fire as a new wildfire event to the Wildfire Expense Memorandum Account (WEMA). PG&E is submitting this Advice Letter solely to facilitate the proposed securitization transaction under Application (A.) 20-04-023. Apart from in connection with a post-emergence rate-neutral securitization transaction, PG&E will not seek cost recovery for the wildfire claims costs associated with the 2017 or 2018 wildfires, including the 2018 Camp Fire, and, even if the Commission does not approve the securitization, PG&E still will not seek to recover such costs in rates.

Background

On July 26, 2017, PG&E filed its WEMA Application (A.17-07-011) requesting authorization to establish a memorandum account for tracking incremental unreimbursed wildfire liability costs. On June 22, 2018, the Commission issued D.18-06-029, which established the WEMA as an ongoing account, not limited to a particular wildfire event. The Commission ordered PG&E to notify the Commission via Tier 1 Advice Letter whenever a new event is added to the WEMA.¹

Discussion

Through this Advice Letter, PG&E notifies the Commission that it is adding the 2018 Camp Fire as a new wildfire event to the WEMA and may track incremental costs of that event as authorized by D.18-06-029 and PG&E's applicable WEMA tariffs.

¹ D.18-06-029, p.6 and OP 4.

PG&E has previously committed to not seek cost recovery for any 2017 or 2018 wildfire claims, including wildfire claims associated with the 2018 Camp Fire, except in connection with a post-emergence rate-neutral securitization transaction (see A.20-04-023 currently pending before the Commission). The Commission has recognized that express commitment, acknowledging that PG&E “will not seek cost recovery for the wildfire claims outside of the securitization application.”² For avoidance of doubt, even “[i]f the Commission does not approve the Securitization, PG&E [still] will not seek to recover in rates any portion of the amounts paid in respect of Fire Claims under the Plan [of Reorganization].”³

PG&E is submitting this Advice Letter solely to facilitate A.20-04-023’s proposed securitization transaction. A.20-04-023 and accompanying testimony focus on wildfire claims costs attributable to the 2017 North Bay Wildfires and not the 2018 Camp Fire based on eligibility criteria in Senate Bill (SB) 901 and D.19-06-027. The 2017 North Bay Wildfires are identified in Exhibit A to PG&E’s Plan. Nevertheless, because the application relies, in part, on an allocation of certain costs among various wildfires, PG&E believes that there may be a need to track all costs paid in respect of Fire Claims under the Plan, including Camp Fire costs, to support that allocation. Submitting this Advice Letter enables PG&E to track that total amount in WEMA, not just some lesser subset, which will facilitate the Commission’s review of A.20-04-023.

The WEMA is a tracking account only. PG&E seeks no cost recovery through this notification. And, as already stated, apart from in connection with a rate-neutral securitization transaction, PG&E will not seek cost recovery of any amounts paid in respect of Fire Claims under the Plan that are tracked in WEMA. Moreover, there are no other Camp Fire costs that are eligible for tracking in WEMA as a result of this Advice Letter for which PG&E would seek cost recovery in the future.

Tariff Revisions

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

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*****

² D.20-05-053, p. 82.

³ D.20-05-053, p. 80 (citing PG&E Reply Brief, p. 28).

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 27, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is August 7, 2020.

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 A.17-07-011. 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/>.

Erik Jacobson
Director, Regulatory Relations

cc: Service List A.17-07-011



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 U39M)

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) #: 4290-G/5907-E

Tier Designation: 1

Subject of AL: Notification of Addition of New Event to Wildfire Expense Memorandum Account

Keywords (choose from CPUC listing): Compliance, Memorandum Account

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-06-029

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: 8/7/20

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

**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	