

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 5953E**  
**As of October 30, 2020**

Subject: Correction to the Green Tariff Shared Renewables Program's Vintage Power Charge Indifference Amount (PCIA) Rates Implemented on May 1, 2020

Division Assigned: Energy

Date Filed: 09-18-2020

Date to Calendar: 09-23-2020

Authorizing Documents: None

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>09-18-2020</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**

September 18, 2020

**Advice 5953-E**

Pacific Gas and Electric Company (U 39 E)

Public Utilities Commission of the State of California

**Subject: Correction to the Green Tariff Shared Renewables Program's Vintage Power Charge Indifference Amount (PCIA) Rates Implemented on May 1, 2020**

**Purpose**

Pacific Gas and Electric Company (PG&E) submits this Tier 1 advice letter to inform the California Public Utilities Commission (Commission or CPUC) of an error recently discovered in PG&E's Green Tariff Shared Renewable (GTSR) Program rates implemented effective May 1, 2020.<sup>1</sup> Specifically, PG&E plans to update the vintage 2015 through 2019 Power Charge Indifference Amount (PCIA) rates applicable to bundled customer electric rate schedules Green Tariff (E-GT) and Enhanced Community Renewable (E-ECR) from capped vintage PCIA rates to uncapped vintage PCIA rates.<sup>2</sup>

**Background**

PG&E included the 2020 GTSR Program Rates for Schedules E-GT and E-ECR in its 2020 ERRA Forecast Application and Testimony filed with the Commission on June 3, 2019. PG&E filed an update to the GTSR Program rates in its November Update of the 2020 ERRA Forecast on November 8, 2019. The GTSR Program's E-GT and E-ECR rate schedules are optional rate schedules for PG&E's bundled service customers.

In previous ERRA Forecasts, the vintage PCIA rates approved for implementation were the same for non-exempt departing load customers and GTSR Program customers. Thus, PG&E has historically had a need for only one set of vintage PCIA rates.

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<sup>1</sup> PG&E's ERRA Forecast rates approved in D.20-02-047 were consolidated with other electric rate changes as part of the Annual Electric True-up Supplemental Advice Letters 5661-E-A and 5661-E-B, submitted on April 22 and April 28, 2020, respectively, for rates effective May 1, 2020.

<sup>2</sup> PG&E is currently serving customers under the E-GT rate schedule, but as of August 2020, there are no customers being served under the E-ECR rate schedule.

The vintage PCIA rates approved in D.20-02-047 and applicable to non-exempt departing load customers were capped for the first time in PG&E's 2020 ERRRA Forecast, except for the 2020 vintage PCIA rate, which is uncapped for all customers. As such, for the first time, a separate set of vintage PCIA rates would be applicable to the E-GT and E-ECR rate schedules, i.e., uncapped vintage PCIA rates.

With the approval of capped vintage PCIA rates for non-exempt departing load customers and uncapped vintage PCIA rates for bundled customers, an update to the process that populates E-GT and E-ECR rates used in PG&E's billing systems and rate schedule tariffs is needed.

Unfortunately, the process was not updated prior to the May 1, 2020 rate change implementation. As a result, the vintage PCIA rates for customers served under PG&E's E-GT rate schedule for vintages 2015 through 2019 are incorrect and result in rates that are too low. In addition, PG&E's published E-GT and E-ECR tariffs also include the incorrect vintage PCIA rates for vintages 2015 to 2019. The vintage 2020 PCIA rates applied to PG&E's E-GT and E-ECR electric rate schedules are correct and do not require modification.

### **Plan for Correction**

Correcting this error requires modifications to the billing systems which is an involved process that entails additional programming, testing, and validation. PG&E's Information Technology team has been working to update PG&E's billing systems to accommodate two sets of vintage PCIA rates and PG&E plans to implement the correct vintage PCIA rates for E-GT customers as soon as possible with a rate change effective December 1, 2021. In addition, the E-GT and E-ECR published tariffs will be updated concurrently to reflect the updated, uncapped vintage PCIA rates for these rate schedules. Table 1 below shows the differences in the uncapped and capped PCIA rates, by vintage and by class for the vintages impacted. These amounts also represent the expected change in the overall Program Rate totals for both the E-GT and E-ECR Programs, as reflected in the tariffs.

**TABLE 1**

<b>Change in PCIA Rates</b>					
<b>Uncapped Vintaged PCIA Rates vs. Capped PCIA Rates (\$ per kWh)</b>					
<b>Rate Class</b>	Vin 2015	Vin 2016	Vin 2017	Vin 2018	Vin 2019
Residential	.01229	.01193	.01128	.01047	.00688
Small L&P	.01178	.01143	.01081	.01003	.00659
Medium L&P	.01269	.01231	.01164	.01081	.00710
E19	.01163	.01129	.01067	.00990	.00651
Streetlights	.00981	.00952	.00900	.00835	.00549
Agriculture	.01099	.01067	.01009	.00936	.00615
E20 T	.00999	.00969	.00916	.00850	.00559
E20 P	.01076	.01044	.00987	.00916	.00602
E20 S	.01120	.01085	.01027	.00952	.00626

As can be seen in the table above, all E-GT customers billed capped PCIA rates during the impacted period will have paid a total rate that is lower than they would have had the uncapped PCIA rate been implemented effective May 1, 2020.<sup>3</sup> PG&E proposes not to rebill the E-GT customers for this period and to implement the correction on a going forward basis, beginning December 1, 2020. PG&E will submit a separate advice letter before the December 1, 2020 rate change to present the corrected rates and tariff sheets for Schedules E-GT and E-ECR.

### **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 October 8, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

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<sup>3</sup> PG&E estimates that there are approximately 2,400 residential and 350 non-residential customers enrolled in Schedule E-GT impacted by this error.

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> 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 respectfully requests that this Tier 1 advice letter submittal become effective immediately upon submission of this advice letter on September 18, 2020 or 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 lists for A.19-06-001. 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](mailto:Process_Office@cpuc.ca.gov). Send all electronic approvals to [PGETariffs@pge.com](mailto:PGETariffs@pge.com). Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

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Erik Jacobson  
Director, Regulatory Relations

cc: Service List A.19-06-001



# 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) #: 5953-E

Tier Designation: 1

Subject of AL: Correction to the Green Tariff Shared Renewables Program's Vintage Power Charge Indifference Amount (PCIA) Rates Implemented on May 1, 2020

Keywords (choose from CPUC listing): Compliance

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

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: 9/18/20

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:

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	
	Ellison Schneider & Harris LLP	Redwood Coast Energy Authority
Alta Power Group, LLC	Energy Management Service	Regulatory & Cogeneration Service, Inc.
Anderson & Poole	Engineers and Scientists of California	SCD Energy Solutions
		San Diego Gas & Electric Company
Atlas ReFuel		
BART	GenOn Energy, Inc.	SPURR
	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Water Power and Sewer
Barkovich & Yap, Inc.	Green Power Institute	Sempra Utilities
California Cotton Ginners & Growers Assn	Hanna & Morton	
California Energy Commission	ICF	Sierra Telephone Company, Inc.
California Public Utilities Commission	IGS Energy	Southern California Edison Company
Carpine	International Power Technology	Southern California Gas Company
	Intestate Gas Services, Inc.	Spark Energy
Cameron-Daniel, P.C.	Kelly Group	Sun Light & Power
Casner, Steve	Ken Bohn Consulting	Sunshine Design
Cenergy Power	Keyes & Fox LLP	Tecogen, Inc.
Center for Biological Diversity	Leviton Manufacturing Co., Inc.	TerraVerde Renewable Partners
		Tiger Natural Gas, Inc.
Chevron Pipeline and Power		
City of Palo Alto	Los Angeles County Integrated	TransCanada
	Waste Management Task Force	Utility Cost Management
City of San Jose	MRW & Associates	Utility Power Solutions
Clean Power Research	Manatt Phelps Phillips	Water and Energy Consulting Wellhead
Coast Economic Consulting	Marin Energy Authority	Electric Company
Commercial Energy	McKenzie & Associates	Western Manufactured Housing
Crossborder Energy		Communities Association (WMA)
Crown Road Energy, LLC	Modesto Irrigation District	Yep Energy
Davis Wright Tremaine LLP	NLine Energy, Inc.	
Day Carter Murphy	NRG Solar	
Dept of General Services	Office of Ratepayer Advocates	
Don Pickett & Associates, Inc.	OnGrid Solar	
Douglass & Liddell	Pacific Gas and Electric Company	
	Peninsula Clean Energy	