

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



May 4, 2021

Advice Letter 5986-E, 5986-E-A, 5986-E-B

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: Procurement Transaction Quarterly Compliance Submittal (Q3, 2020)

Dear Mr. Jacobson:

Advice Letter 5986-E, 5986-E-A, 5986-E-B are effective as of November 29, 2020.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

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



Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
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P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

February 5, 2021

Advice 5986-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 (Q3, 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 July 1, 2020 to September 30, 2020, (Q3-2020) to supplement the material in Confidential Attachment G of Advice Letter 5986-E. Please note this workpaper is being provided as additional documentation to Attachment G and does not replace Attachment G.

Background

Advice Letter 5986-E

PG&E submitted its QCR for Q3-2020 on October 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 5986-E-A

The Multi-Year Local RA Solicitation (Phases I and II) spanned two quarters and was still ongoing at the time of the Q3 2020 QCR Filing. The Independent Evaluator (IE) Report for this Solicitation could not be finalized before the Q3 2020 QCR Filing date. In lieu of the IE Report, PG&E included a Project Status Memo with its Q3 2020 QCR Filing stating that PG&E would submit the final IE Report in a Q3 2020 QCR Supplemental Advice Letter Filing.

Attachment 1: Public Attachment G
Final Phase I and II Multi-Year RA Solicitation IE Report

Attachment 2: Confidential Attachment G
Final Phase I and II Multi-Year RA Solicitation IE Report

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 5986-E and not reopen the protest period.

Effective Date

Pursuant to General Order 96-B, Energy Industry Rule 5.1, this Tier 2 advice letter will become effective concurrent with original Advice Letter 5986-E, which is November 29, 2020. Advice Letter 5986-E was suspended for a period of up to 120 days therefore there is no need to extend the effective date. The effective date of Advice Letter 5986-E-A remains suspended until disposition by Energy Division.

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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

- Attachment 1: Final Phase I and II Multi-Year RA Solicitation IE Report (Public)
- Attachment 2: Final Phase I and II Multi-Year RA Solicitation IE Report (Confidential)
- 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) #: 5986-E-A

Tier Designation: 2

Subject of AL: Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q3, 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.03-12-062 and D.02-10-062

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: 11/29/20

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 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

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State: District of Columbia Zip:
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Email:

Advice 5986-E-A
February 5, 2021

Attachment 1

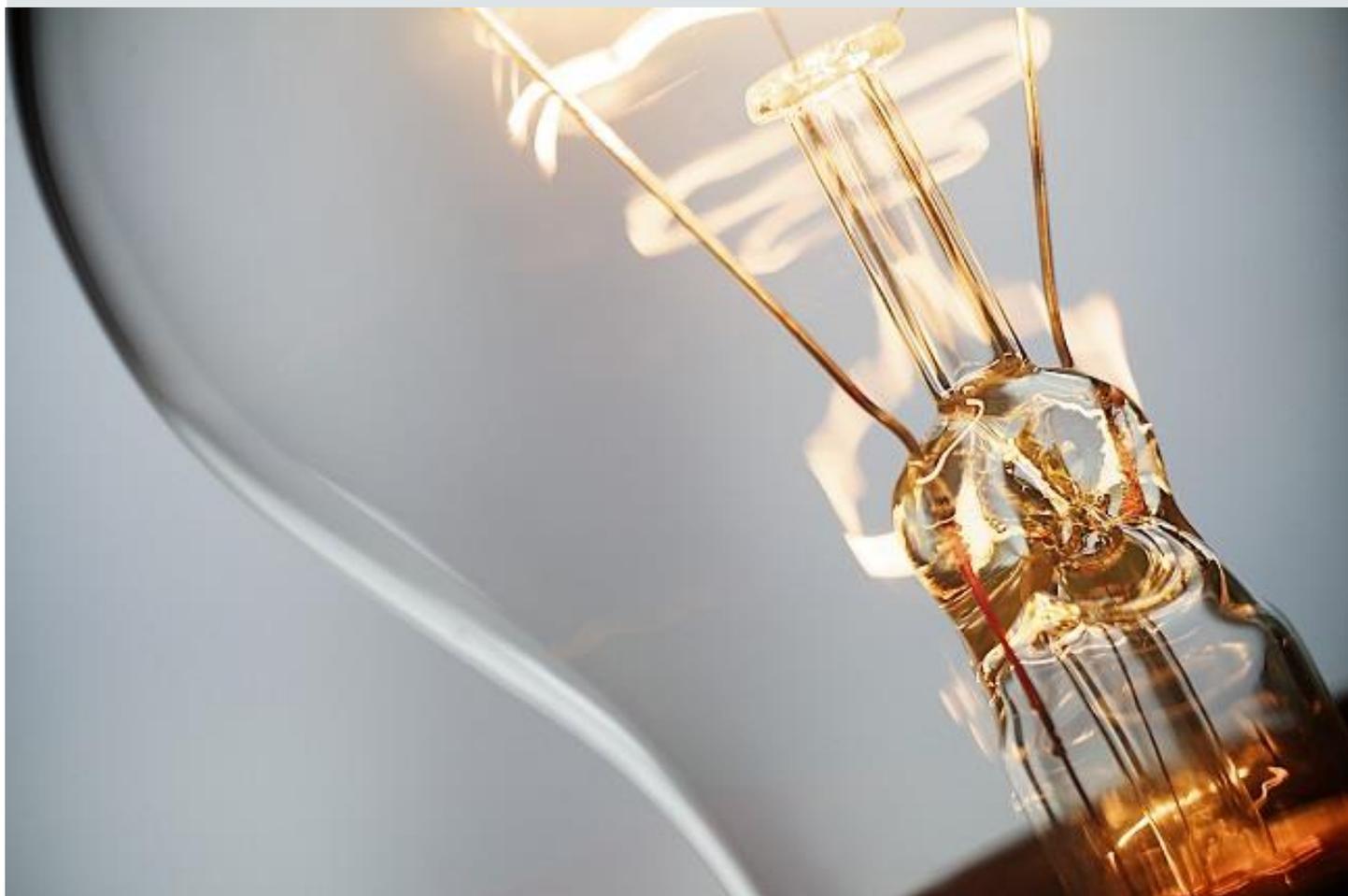
Final Phase I and II Multi-Year RA Solicitation
IE Report
(Public)



PACIFIC GAS & ELECTRIC

Independent Evaluator Report for the 2020
Multi-Year Resource Adequacy
Solicitation

January 2021



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Version no: 1.0

Document reference: PGE 1950T04F

EXECUTIVE SUMMARY

PA Consulting Group, Inc. (PA) served as the Independent Evaluator (IE) for the Pacific Gas & Electric (PG&E) 2020 Multi-Year Resource Adequacy (RA) Solicitation (2020 Multi-Year RA Solicitation or the Solicitation). This report provides PA's evaluation of the process from the drafting of the Solicitation documents through to the recommendation of selected bids and negotiation of contracts.

Overview of Solicitation

PG&E conducted the 2020 Multi-Year RA Solicitation in two Phases. Phase I was intended to address market needs after the release of the initial 2021 Year-Ahead RA allocations and Net Qualifying Capacity (NQC) lists; Phase II was intended to finalize procurement upon release of the final NQC list.

During the course of evaluating Phase I bids, it became apparent that in addition to being generally long on RA on a System basis in most months, PG&E is likely to remain short on RA for certain months and for certain Local areas, specifically the Bay Area, Kern, North Coast/North Bay, Sierra, and Stockton areas. Additionally, certain bidders wished to convey non-conforming offers such as tolling offers to PG&E. To address this, PG&E entertained non-conforming offers for Local RA. Non-conforming offers were those that were specified in the transmittal email of a bidder's bid submittal or via telephone conversations, but were unable to conform to the mutually exclusive constraints incorporated into PG&E's required bid forms. PG&E notified the IE of this strategy and made it clear that non-conforming offers were only considered after the initial offers had been evaluated via PG&E's evaluation modeling and had been either shortlisted or rejected. In this manner, PG&E maintained the integrity of the evaluation by evaluating conforming offers first, and only after conforming offers were addressed were non-conforming offers evaluated. PG&E also accepted non-conforming offers in Phase II of the Solicitation.

PG&E did not specify the amounts of RA capacity it wished to sell. Phase I activities concluded in mid-September 2020, with PG&E executing transactions with [REDACTED]

Phase II of the solicitation was launched on September 18, 2020. Because of the uncertainty related to exactly when the California Independent System Operator (CAISO) would release its final NQC list, the Solicitation specified that bids would be due 2 business days after the NQC list was published. Ultimately, bids were due on October 5, 2020.

Phase II activities concluded in December 2020, with PG&E executing transactions with [REDACTED]

PA's IE Report

PA's IE report generally follows the California Public Utilities Commission's (Commission or CPUC) Solicitation Shortlist Report Templates. The main sections include:

- Section 1: Summary of the 2020 Multi-Year Resource Adequacy Solicitation
- Section 2: Summary of PA's role as IE for the Solicitation
- Section 3: PG&E's outreach efforts
- Section 4: PG&E's methodology design
- Section 5: Fairness of the application of PG&E's Bid Evaluation Criteria
- Section 6: Merit of Solicitation shortlists
- Section 7: Fairness of negotiations
- Section 8: PA support for contract approval

Main IE activities during solicitation

PA's role in PG&E's Solicitation spanned approximately five months from August to December 2020. The following provides a summary of PA's main activities during this solicitation:

- PA reviewed drafts of the Solicitation documents prior to PG&E issuing the Solicitation.
- PA received all communications between PG&E and bidders. PA directly received all the emails, including bid packages that were sent to and received from bidders as well as non-compliant offers bidders made to PG&E.
- PA also participated in telephone conferences that PG&E held with individual bidders. In cases where PA was unavailable for a specific conference, PG&E provided call notes to PA.
- PA and PG&E conducted several IE calls during which PG&E advised PA of the status of the Solicitation and discussed the treatment of certain bids.
- PA reviewed all Phase I and Phase II bids.
- PA reviewed PG&E's shortlisted bids prior to the initial shortlist notifications and prior to the final shortlisted notifications for both Phase I and Phase II.
- PA reviewed PG&E's contract negotiations via redlined documents with selected bidders to ensure that the negotiation process was fair and all bidders were treated consistently.

High level summary of findings

Overall, PA confirms that PG&E conducted a fair and equitable Solicitation.

Some specific findings are noted below:

- PG&E in no way prevented PA from observing its process and analyzing its methods and did not interfere with PA's conducting the Independent Evaluation.
- PA finds that PG&E's outreach for the Solicitation was adequate, the solicitation materials were clear and concise, and that PG&E further clarified its position in several follow-up bidder questions.

- During both Phases of the Solicitation, PG&E entertained non-compliant offers. These offers were made in emails via direct language, rather than via PG&E's pre-defined bid input forms which were provided with the initial Market Notice documents. PG&E discussed its intention to entertain these offers with PA prior to doing so, and PA agreed the offers were consistent with the objectives of the Solicitation and were evaluated and negotiated fairly by PG&E.
- Based on our review of PG&E's analysis, our participation in calls and meetings and other IE activities, PA finds that PG&E conducted the 2020 Multi-Year RA Solicitation evaluation analysis fairly and selected appropriate offers.

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1 SUMMARY OF THE 2020 MULTI-YEAR RESOURCE ADEQUACY SOLICITATION

Through this solicitation, PG&E offered to sell and requested bids for the following types of RA: Local, System, and Flexible RA, and IAR. Additionally, PG&E's Solicitation stated that PG&E would be willing to execute a limited number of combined purchase and sales transactions, provided the combined transactions would not result in a short position for PG&E.

PG&E planned to conduct the Solicitation in two Phases. The Solicitation protocol for Phase I, launched on August 11, 2020, was intended to seek bids after the Initial 2021 Year-Ahead RA Allocations from the CPUC had been received by Load Serving Entities (LSE). The initial Market Notice for Phase I required bids to be submitted by August 18, 2020; however, after it became apparent that certain potential counterparties had not received the Market Notice due to email security issues, PG&E extended the bid submittal deadline to August 19, 2020.

Phase II of the Solicitation was launched on September 18, 2020, prior to the CAISO issuing its final NQC list; however, the bid submittal deadline for Phase II occurred after the NQC list was released.

PG&E's Solicitations have evolved into using a predesigned bid input form developed internally at PG&E using MS Excel spreadsheets and containing "macros", a type of coding language used in the spreadsheets. The purpose of the form has been to ensure that all bids conformed to a specific format containing information related to the bidding entity, what type of RA or IAR the entity was seeking to purchase or sell, the month and quantity of the bid, and the price. The bid form has been designed to not allow bidders to change most of the format, thus ensuring consistency and standardization of bids, allowing for PG&E staff to incorporate all bids into its optimization model quickly and accurately.

Upon the launch of Phase I of the Solicitation, a limited number of bidders reported issues entering the specifics of their bids into the form, and in an even more limited number of cases, the bidder's email security systems blocked the transmission of the bid forms due to the bid forms' use of the macro coding language. Through discussions with these bidders over both email and a telephone conference call to which PA was invited and attended, PG&E was able to determine the cause of the issue and ultimately provide bidders the bid form. PG&E communicated with all entities on its Solicitation distribution email list to ensure that all entities received the Market Notice and associated bid form. As a result of these issues, PG&E notified all potential bidders that the bid submittal deadline was delayed by one day.

In addition to the email security challenges, it also became apparent that the design of the bid forms restricted certain bidders from accurately defining their bids. This was due to the forms having been designed to limit the number of mutually exclusive bids in any given month. The purpose of this limitation was to ensure that PG&E's optimization model could incorporate all bids without causing infeasibly long run times to arrive at the optimal solution providing the most value for PG&E and its customers. As discussed below, bidders have become increasingly reliant upon mutually exclusive bids due to the evolution of PG&E's Local RA requirements.

1.1 PG&E's Local RA Requirements

Resource Adequacy is the primary mechanism to ensure reliability of supply for LSEs operating under CPUC jurisdiction, including PG&E. RA in California consists of three distinct components: System RA, Local RA, and Flexible RA. Local RA must be procured on three-year forward basis, while System and Flexible are procured on a one-year forward basis. LSEs must either self-build or contract for required RA capacity. The CPUC recently approved a number of key changes to RA procurement that will be discussed in greater detail below, following a discussion of the overall RA markets.

Unlike the centrally cleared capacity auction processes in other markets, RA in California is transacted on a bilateral basis. For a resource to qualify for RA, its contract needs to carry a must-offer obligation, which requires it to submit self-schedules or bids into the CAISO market and make itself available for dispatch. There is a mechanism to ensure availability called the Resource Adequacy Availability Incentive Mechanism (RAAIM) that charges resources \$4.25/kW-mo for availability shortfalls below 94.5% of its must-offer obligation during certain assessment hours.¹

System Resource Adequacy

System RA requirements are designed to ensure LSEs meet expected peak loads (plus a 15% reserve margin) in the entire CAISO balancing area. In their annual filings (due October of each year), LSEs must demonstrate that they have procured 90% of their System RA requirements for the five summer months of that upcoming compliance year (May through September); in their monthly filings, LSEs must show 100% procurement for the upcoming month.

LSEs contract for RA capacity outside of the market-wide solicitations. Solicitations are reviewed by an independent evaluator who reports to the CPUC. Long-term RA contracts for new-build resources are common. However, while LSEs can contract with existing resources for five years or longer, doing so requires that the utility apply to the CPUC for approval, and such contracts have historically been rare; this is because LSEs and the CPUC are wary of locking in capacity given uncertainty around future capacity needs in California's evolving market and policy environment.²

Local Resource Adequacy

Local RA requires LSEs to procure a minimum amount of capacity for transmission-constrained load pockets known as Local Constraint Areas (LCAs), which are determined by CAISO. As additional capacity cannot be reliably transmitted from regions where capacity builds may be more economic into these constrained zones, Local RA contracts are generally of higher value than those for System RA.

As it applies to PG&E, the company had two aggregation areas to address Local RA: PG&E Other and Bay Area. However, in February 2019 the CPUC issued a decision (the Track 2 Decision, D. 19-02-022) that ordered the disaggregation of the six LCAs comprising PG&E Other for Local RA compliance purposes. The CPUC concluded that disaggregation "is a necessary first step towards addressing inefficient procurement that may lead to backstop procurement."

The Track 2 Decision also addressed compliance with multi-year Local RA requirements. Beginning with the 2020 compliance year, LSEs must secure 100% of Year 1 and Year 2 Local RA requirements, and at least 50% of Year 3 Local RA requirements. LSEs that are unable to secure sufficient Local RA capacity may apply for waivers and may avoid possible penalties but will be responsible for associated backstop procurement costs.

Additional issues raised by the Track 2 Decision, including centralized procurement for RA and the re-aggregation of PG&E Other, are discussed in greater detail below.

¹ Hours vary by RA type. For generic RA capacity, it is weekdays Hour Ending 17-21, while for Category 1 Flexible RA, hours are daily Hour Ending 6-22.

² Source: CPUC 2013; Review of Current Issues with Long Term Resource Adequacy.

Flexible Resource Adequacy

The RA program's final component, Flexible RA, attempts to ensure that LSEs can meet the largest continuous three-hour load ramp need in every month. Utilities must verify their flexible capacity procurement on a monthly and annual basis.

Thus far, Flexible RA showings have been adequate to meet needs. However, the product has generally attracted inflexible units rather than the highly flexible capacity desired. Such issues have motivated CAISO to pursue multi-year efforts to update rules around eligibility for Flexible RA.

Centralized Procurement

The February 2019 Track 2 Decision arose from a proceeding in Docket R. 17-09-020 which began in January 2018. In this rulemaking, the CPUC sought to evaluate various RA improvements, including the merits of centralized procurement. Under a Centralized Procurement Mechanism (CPM), a Central Procurement Entity (CPE) (e.g., CAISO, large utilities, or a special purpose entity) would procure capacity on behalf of smaller LSEs. In June 2018, the CPUC found that centralized procurement is most appropriate for multi-year Local RA, but that it has drawbacks for system or flexible RA. In the Track 2 decision, the CPUC formally adopted a set of changes to the RA program, including the multi-year requirements for Local RA procurement, but postponed adoption of a CPM.

Additional stakeholder engagement following the Track 2 Decision led to a June 2020 decision in which the CPUC approved a hybrid model that still allows LSEs to self-supply but designates PG&E and SCE as central buyers for their respective service territories as it applies to Local RA only. Under this hybrid model, LSEs can continue to procure their own resources, and if an LSE-procured resource also meets a Local RA need, the LSE has three options: 1) sell the capacity to the central buyer; 2) utilize the resource for its own System and Flexible RA needs; or 3) voluntarily show the resource to meet its own System and Flexible RA needs, and reduce the amount of Local RA that the central buyer will need to procure for the amount of time the LSE has agreed to show the resource.

Under the third option, the LSE does not receive a 1:1 credit for shown local resources; rather this local procurement reduces total central procurement costs to be shared by all LSEs. The LSE will retain the ability to use this local resource for its own System and Flexible needs. The central buyer will then determine what remains to be procured to avoid any local deficiencies. The changes are to take effect beginning with the 2023 compliance year.

A key advantage to the CPM is that the central buyer can more efficiently procure Local RA by selecting the lowest cost and most effective resources. Procurement by LSEs could lead to situations in which the most effective resource for overall grid reliability is not procured. For example, LSEs could base local resource decisions on their lowest cost, or local benefits such as providing jobs. This could lead to inefficient procurement and deficiencies at the local level that result in costlier backstop procurement. The CPM allows the central buyer to select the most effective local resources for overall grid reliability and also adapt to load uncertainty and migration by equitably allocating Local RA costs directly to end-users.

Additional Track 2 Considerations

In addition to addressing multi-year Local RA procurement and the hybrid model for Local RA procurement in PG&E and SCE service territories, Track 2 sought to make changes to the existing penalty structure for RA deficiency.

One issue relating to penalties imposed for RA deficiencies was that penalty prices, or RAAIM, were at times set below RA capacity prices, resulting in perverse incentives for LSEs whereby they would simply not procure RA capacity and instead pay the penalty, particularly during summer months when RA prices are at their highest. In order to address this, the CPUC adopted a shaped penalty system that moves October from a winter to a summer month and provides for a penalty of \$8.88/kW-mo during the summer (May-October) and \$4.44/kW-mo in non-summer months.

Track 2 also addressed the PG&E Other LCA, calling for it to be disaggregated into its original six components. At the time, the Commission reasoned that disaggregating was a

first step towards addressing inefficient procurement of Local RA. Ongoing Track 2 proceedings evaluated whether the six LCAs comprising PG&E Other should be reaggregated or remain disaggregated. In the June 2020 decision, the Commission stopped short of reaggregating PG&E Other, but it does allow LSEs to demonstrate compliance with Local RA requirements by showing that procurement of Local RA capacity within the LCAs comprising PG&E Other meets the LSE's collective requirement for the disaggregated PG&E Other LCAs. Thus, aggregated Local RA procurement is essentially still in effect for PG&E Other.

1.2 Conforming and Non-conforming Offers

In prior Solicitations, PG&E accepted only those offers which strictly conformed to its bid forms, allowing for evaluation and shortlisting of multiple bids within the necessary timeframes. While this process has worked well in prior Solicitations, during Phase I of the 2020 Solicitation it became apparent that certain bidders wished to make different types of offers which, while being offers of interest and value to PG&E, did not strictly conform to the format of the bid form. Additionally, PG&E wished to conduct additional outreach with certain bidders based upon the nature of their original offer, typically inquiring whether bidders had volumes available in certain Local RA areas in which PG&E itself needed RA.

As such, PG&E discussed with PA its desire to entertain offers which did not conform to the original bid forms, or non-conforming offers. PG&E felt that this strategy would maximize the value of the Solicitation and associated transactions to PG&E and its customers, while remaining a fair and equitable procurement process. PG&E ensured this fairness by devising a process in which all conforming offers and bids were evaluated first, and any resulting RA positions (either long or short) PG&E had would then be evaluated in light of any non-conforming offers PG&E received. In this manner, all bidders' conforming offers were evaluated on equal footing in PG&E's optimization modeling, while all bidders were given the opportunity to make additional, non-conforming offers which PG&E evaluated on an individual basis.

This process was challenging for PG&E in that it was seeking to ensure both fair and consistent treatment of all bids and offers to its Solicitation while also needing to achieve compliance for its own RA requirements and demonstrate a good faith effort to procure enough Local RA to comply with CPUC and CAISO requirements. PA agreed with PG&E's decision to entertain non-conforming offers while working to ensure fair and equitable treatment of all bidders.

1.3 Solicitation Bid Evaluations, Shortlisting, and Negotiations

[REDACTED]

2 INDEPENDENT EVALUATOR ACTIVITIES DURING THE SOLICITATION

This section provides a description of PA's activities as the Independent Evaluator throughout the Solicitation, bid selection process, and contract negotiations.

2.1 IE's key roles and responsibilities

The role of the IE is to provide advice to the utility on the design, administration, and evaluation aspects of the Solicitation. The CPUC has clarified that the role of the IE is not to conduct or administer the solicitation, but to "separately evaluate and report on the IOU's entire solicitation, evaluation, and selection process."

Additionally, the IE is to ensure that PG&E treats all bidders fairly and equitably and that no particular counterparty is favored. The IE also ensures that the bid selection process is transparent and is aligned with the procurement requirements. PG&E can also call on the IE's advice as to various evaluation issues that may arise during the Solicitation process. During the course of this Solicitation, PG&E did consult with the IE regarding certain aspects of the evaluation process.

2.2 PA's activities as IE

This section describes the activities PA performed associated with each stage in the Solicitation process in the role of IE for the 2020 Multi-Year RA Solicitation. PA was involved from PG&E's development of the solicitation materials in mid-August through the selection of the bids and the negotiation and execution of contracts in late December. PA evaluated whether the procedures followed by PG&E were aligned with the process it established in its Solicitation protocol and provided fair and equitable treatment of all bids. PA was in regular contact with PG&E staff throughout the process, addressing PG&E's questions, identifying and resolving potential issues, and providing recommendations throughout the process.

2.2.1 Solicitation materials

PA reviewed the Solicitation protocols prior to the Market Notice issuance and was in contact with PG&E regarding the development of the solicitation protocol, evaluation methodology, draft Confirmation Agreement, and other solicitation materials. PG&E provided the draft Confirmation Agreement including highlights of changes from prior versions.

On September 9, 2020, PG&E held a Phase II planning discussion with PA and provided PA with the draft Phase II Solicitation protocol for review prior to launching Phase II. PG&E developed the solicitation materials to reflect the specifics of the 2020 Multi-Year RA Solicitation in a clear and concise manner.

The Phase II Market Notice contained language notifying potential bidders that the bid submittal deadline would be 2 business days after the CAISO released the final NQC list, the date of which at the time was unknown. The Solicitation email contained draft Confirmation Agreements (Confirms) for bidders to consider and notified bidders that PG&E would not entertain material revisions to the draft Confirms.

2.2.2 Bid submittal process

PG&E's bid intake process for the Solicitation was conducted entirely via email, including Phase I and II Solicitation Market Notices, draft RA Confirms, and Bid Forms.

Several bidders submitted both bid forms as well as non-conforming offers via email. Additionally, as PG&E followed up to acknowledge bidders' submittals and throughout the negotiations process, PG&E requested bidders with interest in selling Local RA in the Local Areas of need for PG&E to contact PG&E to discuss potential offers.

2.2.3 Communication with bidders

PG&E communicated with bidders via email and conference calls. The conference calls were infrequent and often scheduled on short notice. In a few instances, bidders contacted PG&E directly via telephone.

PA attempted to attend all conference calls with bidders but was unable to attend every single one. In the cases where PA was unable to attend, PG&E provided call summary notes to PA. PA then closely followed subsequent email communications with the given bidder in light of the call notes to ensure the accuracy of the notes as well as ensuring that PG&E did not provide preferential treatment of any kind to any bidder.

2.2.4 Initial bid review and conformance check

After receiving bids, PG&E conducted a conformance check on each bid to determine its compliance with all bid requirements. Several bidders had questions regarding the use of the Bid Form template to submit their bids, and emailed PG&E prior to the bid submittal deadline for clarification. The majority of the bidders copied PA on initial email contacts with PG&E; for those that didn't, PG&E copied PA on the initial replies in answering questions about the forms.

Given the complexity of the Solicitation, with PG&E buying and selling both Local and System RA as well as IAR, the bid forms necessarily included limitations on the number of options – particularly mutually exclusive options – that a bidder could include in their submittal. Multiple bidders contacted PG&E to request assistance with manipulating the bid form to achieve their desired bid configuration. PA did not consider the number of questions regarding the bidding process to be excessive, but rather indicative of the evolving nature of RA procurement for all entities as well as the multiple solicitations occurring in California at the same time as LSEs sought to satisfy all of their RA requirements for the upcoming compliance deadlines.

While PG&E and PA did find some of the bids to be non-conforming, PG&E and PA did not reject any bids for non-conformance.

2.2.5 Evaluation process

PG&E developed an optimization model incorporating PG&E's initial supply positions for System and Local RA and IAR; the optimization model and evaluation process are described in detail in Section 4 of this report. PG&E has used this model on prior solicitations and has previously described the model and its methods for ranking, accepting, and rejecting bids based on a combination of bid price and requested volumes, and PA is familiar with the model and comfortable that it equitably determines the optimal combination of shortlisting awards. The model awards equally priced bids on a pro rata basis subject to PG&E's supply availability for the given product and given delivery timeframe. While PA did not execute the optimization models, PA assembled a summary of all bids and their shortlisting status and conducted random spot checks of several bids from both Phase I and Phase II and their ultimate acceptance or rejection and found no issues with PG&E's ultimate bid shortlisting.

2.2.6 Shortlist determination

The initial proposed Phase I shortlist was provided to the Procurement Review Group (PRG) and PG&E provided PA with copies of the proposed shortlist and the PRG presentation materials. PG&E answered a number of clarifying questions PA had prior to notifying bidders of their shortlisting status. The Phase II shortlist was also provided to PA prior to shortlist

notifications. Ultimately, PG&E reviewed with and discussed all shortlists with PA prior to notifying any bidders and incorporated PA's recommendations regarding decisions PG&E faced.

2.2.7 Contract negotiations

To streamline the process and reduce time between shortlisting notifications and Confirm executions, PG&E included the draft Confirms documents in the Solicitation protocols and requested that prospective bidders provide comments and redline edits to the draft Confirms with their bid submittals. PG&E has used this process in recent solicitations, and the majority of bidders to this Solicitation have been participating in the majority of these solicitations and typically have few, if any revision requests.

However, this and the prior Solicitation have seen new participants submitting bids, and in some cases submitting non-conforming bids and offers which are departures from the typical RA transactions that occur in PG&E's RA solicitations. For these bidders, the majority of the negotiations related to the counterparty executing an EEI Master Agreement with PG&E as well as the specific terms of the transactions' Confirms.

There were a number of bids which required Confirms with significant revisions to accommodate the given bid. [REDACTED]

Other bids, particularly non-conforming bids, required multiple emails and telephone conference calls as well. In total, between Phase I and Phase II, there were hundreds of emails and dozens of telephone conference calls between PG&E and counterparties. PA monitored all email communications during negotiations and participated in the majority of negotiation meetings via conference calls. More details of any negotiation observations and issues are discussed further in Section 7.

2.2.8 PG&E's Procurement Review Group meetings

During the Solicitation, PG&E provided the PRG with summaries of the bids received from both Phase I and Phase II. Additionally, on Thursday, August 27, 2020, PG&E provided the proposed Phase I shortlist awards to the PRG and sought comments from the PRG prior to notifying counterparties of those awards. Similarly, on Friday, October 9, 2020, PG&E provided the proposed Phase II shortlist awards and sought comment prior to notifying counterparties. PA was not aware of and did not participate in any PRG meetings related to this Solicitation.

3 ADEQUACY OF PG&E'S OUTREACH

This section addresses the adequacy of PG&E's outreach for the Solicitation as well as the Solicitation materials.

3.1 Notifications and announcements

PG&E's outreach included notifications to PG&E's wholesale RFO distribution list and PG&E's e-solicitation RA list containing approximately 440 email addresses.

During negotiation emails and conference calls, PG&E directly asked counterparties if they had any Local RA volumes for sale or if the counterparties were interested in any simultaneous purchases and sales involving Local RA.

At the time of the Solicitation, there was an elevated interest in RA procurement across the California energy markets, due to the pending RA compliance requirements for 2021-2022. PA observed heightened interest in PG&E's Solicitation relative to prior solicitations and believes that between this general market awareness of RA procurement activities and PG&E's efforts to publicize its Solicitation and desire to purchase Local RA volumes, PG&E extended adequate outreach for the Solicitation.

3.2 Solicitation materials

PG&E created Solicitation Market Notices and associated materials for each Phase of the Solicitation. The solicitation materials were provided to PG&E's solicitation email distribution list in the Solicitation outreach, including the Market Notice, draft Confirm and draft EEI Master Agreements, and the bid submittal form developed by PG&E. The Market Notice included information on the types of products PG&E was seeking and over what term, as well as a proposed Solicitation evaluation schedule.

In PA's opinion, PG&E provided appropriate Solicitation materials and provided prompt response to any questions received by potential bidders.

4 PG&E'S BID EVALUATION DESIGN

This section describes PG&E's bid evaluation methodology for the Solicitation.

4.1 Principles used to evaluate methodology

PA used the following principles to guide its evaluation:

- The procurement targets and objectives should be clearly defined in PG&E's solicitation materials;
- The evaluation should only be based on those criteria requested in the response form;
- The methodology should identify how quantitative measures will be considered and be consistent with an overall metric;
- The approach should not be biased for or against specific counterparties; and
- The methodology does not have to be the one that the IE would independently have selected but it needs to be "reasonable".

4.2 Amount and type of RA products

In this Solicitation, PG&E sought offers for sale (i.e., **PG&E buys**), bids to purchase (i.e., **PG&E sells**), and offers for sale / bids to purchase (i.e., **simultaneous PG&E buys/PG&E sells**) of eligible Local and System RA with January through December 2021 delivery periods; PG&E also sought bids to purchase (i.e., **PG&E sells**) for Import Allocation Rights (IAR) monthly products for the January through December 2021 delivery periods. PG&E sought offers for sale (i.e., **PG&E buys**) of WSPP Schedule C Import Energy (IE) for the February through December 2021 delivery periods, and for Local RA with January 2021 through December 2022 delivery periods. PG&E did not specify the amounts of RA capacity it wished to purchase but did specify minimum volumes of 1 MW for all products except Import Energy, which had a minimum volume of 5 MW specified.

The Market Notice further noted that PG&E's preference is to transact Import Energy indexed to CAISO LMP but would also consider offers for ICE Indexed or Fixed Prices transactions.

4.3 Description of PG&E's bid evaluation methodology

PG&E's valuation and selection approach was intended to evaluate the different product types on as equal a footing as possible. The initial step included a conformance check of each offer. The conforming offers then went through an optimization analysis designed to maximize ratepayer value while maintaining compliance with RA requirements. The methodology considered both quantitative as well as qualitative factors as described below.

4.3.1 Conformance check

The initial analysis included an assessment of conformance. All offers needed to conform to the minimum participation criteria and eligibility. The Solicitation was less complex than other procurement processes in which the utility is seeking to acquire resources, and as such had more limited conformance requirements.

The conformance requirements were generally limited to the following required documents:

- A redline mark-up of the RA Confirmation or a statement that the bidder accepts PG&E's form RA Confirmation without change;

- RA Bid Form Template, indicating the types, delivery term, and volumes the bidder wished to purchase;
- An acknowledgement of the Solicitation Confidentiality Agreement; and
- Documentation of the bidding entity's legal status from the California Secretary of State.

As noted above, PG&E determined early during Phase I of the Solicitation that non-conforming bids would be accepted. These included complex, mutually exclusive RA bids which could not be accommodated in PG&E's bid forms as well as more atypical bids involving projects under development, proposed tolling agreements, and other types of bids. PA is not aware of any bids which were rejected for non-compliance nor of any late bids which were rejected due to being submitted past the submittal deadlines.

4.3.2 Quantitative bid evaluation

PG&E primarily relied on a quantitative evaluation of each bidder's proposed volumes of RA desired and the bidders proposed price for each product. Due to the complexity of the Solicitation with multiple products and transaction types, PG&E necessarily relied on a combination of its optimization model as well as the value judgements made by PG&E's Structured Transactions team which conducted the Solicitation.

In no cases did PG&E reject a finding by the optimization model and execute a transaction which the optimization model did not select for award; rather, the nature of the non-conforming offers dictated that after the optimization model had selected the optimal conforming bids and offers for execution, the PG&E team evaluated the non-conforming bids and offers on an individual basis and determined whether a given bid or offer would be accepted by PG&E and awarded to the offering counterparty.

In this manner, PG&E honored the conforming offers first using the optimization model, and then awarded and ultimately executed additional transactions based on the non-conforming offers received.

Development of supply curves

Prior to the issuance of the Solicitation, PG&E developed a cost-based supply curve for each RA product to set minimum selling prices for each product. PG&E established the curve such that the sales price, at a minimum, would compensate PG&E for any potential CAISO RAAIM penalties incurred plus administrative costs. The aggregated supply curve was developed for each month, with total MWs available at each pricing increment in dollars per kilowatt-month (\$/kW-mo).

The minimum sales prices determined by the curve are set to compensate PG&E for any potential exposure to CAISO RAAIM penalties. For each increment of RA sales (or load), the supply curve calculates a minimum price for each unit to support such obligations, considering its tariff requirements, historical and anticipated performance, and potential CAISO penalties, thereby creating individual unit supply curves. Where applicable, the unit supply curves also include locational premiums associated with units in local areas. Aggregation of the unit supply curves creates the overall supply curve PG&E utilized to evaluate bids in the Solicitation.

Bid optimization

Using the supply curves, PG&E optimized the bids for value and RA requirements compliance. The bids were evaluated based on value (revenue from sales net of expected RAAIM penalties for each unit) on a monthly basis.

The optimization procedure awarded combined purchase and sales transaction bids first, and following any awarded combined transactions, the model recalculated PG&E's positions for

each of the RA products. The procedure then awarded RA sales, and again recalculated PG&E's RA positions. The final step in the optimization procedure was to award any IAR.

The bid optimization procedure considered the following constraints: System position, Local generic position, System and Local Flexible RA positions, and the supply curve floor prices.

4.4 Evaluation of PG&E's methodology

PA generally believes that PG&E's methodology was reasonable, within the context of the principles set forth in Section 4.1. While PA believes the methodology is reasonable, PG&E's application of the methodology did result in relatively minor challenges as described in Section 5.

5 FAIRNESS OF PG&E BID EVALUATION

This section addresses the application or administration of the methodology described in Section 4.

5.1 Principles IE used to evaluate evaluation methodology

As in the previous section, PA used the following principles to guide its evaluation, and in this case phrased as questions:

- Were bidder questions answered fairly and consistently and the answers made available to all?
- Did the utility ask for "clarifications" that provided the bidder an advantage over others?
- Were all bids given equal credibility in the economic evaluation?

5.2 Administration of bid evaluation process

A description of PA's activities in its role as IE is provided in Section 2. Based on PA's participation and observations we believe that:

- Bidder questions were answered fairly and consistently
 - PA monitored all communications between bidders and PG&E including questions, and believes the questions posed were reasonably and fairly answered
- PG&E's clarification questions were minimal and reasonable, and did not advantage any bidder;
- PG&E applied conformance requirements fairly to all bids and consistent with bid documents;
- All conforming bids were given equal credibility in the quantitative evaluation;
- Bids were ranked and evaluated as consistently as possible; and
- PG&E's evaluation of bids and selection of shortlisted bids conformed to the Solicitation documents.

5.3 IE's review of PG&E's conformance checks

After the Phase I and II bids were submitted and the Solicitation closed, PG&E began an initial conformance check. PA also received a complete copy of all the bids as they were submitted. There were several bidders whose bid forms were either incomplete or had unclear proposals; for these bids PG&E contacted the bidder and clarified the bid; PA was included on all such communications. Given the Solicitation was relatively straightforward with few requirements, PA did not anticipate and is not aware of any bids which PG&E rejected for non-conformance.

5.4 Review of PG&E's application of the bid evaluation methodology

5.4.1 Review of evaluation of offers

PA reviewed PG&E's quantitative evaluation through a spot checking of individual bids and their acceptance for shortlisting or rejection by PG&E. This process and spot checking occurred for both Phase I and Phase II bids.

Through this process, PA was able to review and confirm PG&E's interpretation of the original bid data as well as the application of the optimization modeling. PG&E's evaluation of the bids consisted of optimizing the bids for value and RA requirements compliance, which

required updating PG&E’s RA positions for System RA as well as various Local RA positions after combined purchase and sales transactions were selected, as the combined transactions both increased and decreased RA positions depending on the specifics of the transaction.

5.5 IE’s review of PG&E’s selected shortlists

PA held discussions with PG&E regarding each of its proposed shortlists in Phase I and Phase II.

The Phase I proposed shortlist was provided to PA on Thursday, August 27, 2020.

[REDACTED]

After revisions to the initial Phase II shortlist to account for the issues described above, PA believes the final Phase II shortlist was selected appropriately.

5.6 Fairness of PG&E’s evaluation

Based on PA’s review of PG&E’s analysis, participation in calls and meetings and other IE activities, PA believes that PG&E conducted the 2020 Multi-Year RA solicitation evaluation analysis fairly.

5.7 Recommendations

PA believes that PG&E conducted the 2020 Multi-Year RA Solicitation evaluation in a fair and consistent manner and that the Solicitation process went reasonably smoothly.

While PA found the timeline for this Solicitation to be relatively short, we found that the majority of the time spent on the negotiations for the transactions was spent on negotiating language in the Confirm agreements related to the transactions, and in those cases, it tended to be a new bidder to PG&E’s RA Solicitations, making the increased level of negotiations reasonable.

Specific to the bid evaluation process and timeline, PA recommends that wherever possible, in future Solicitations PG&E allow for additional time to conduct the quantitative evaluations. PA understands that the timeframes for both the Phase I and Phase II evaluations were driven by the timing of the preliminary and final RA allocations released by the CPUC and the final NQC determinations by the CAISO relative to the October 31st compliance filing requirement.

PA understands that the timing of the allocations and NQC list are driven by entities outside of PG&E’s control, and when considered in light of the difficult evaluation and shortlisting

challenges experienced by PG&E in the 2019 Multi-Year RA Solicitation, PA believes PG&E conducted the 2020 Solicitation relatively smoothly and effectively.

6 MERIT OF SOLICITATION SHORTLIST

Through the bid evaluation and selection process, PA believes that PG&E selected the best offers submitted for the 2020 Multi-Year RA Solicitation.

6.1 Did PG&E conduct the solicitation consistent with Commission decisions and PG&E's defined bid evaluation methodology?

It is PA's opinion that PG&E conducted a fair solicitation consistent with Commission decisions and PG&E's defined bid evaluation methodology.

6.2 Do selected shortlisted bids provide the best overall value to ratepayers?

PA believes PG&E fairly selected its shortlists of bids for the Solicitation and that the bids provide the best overall value to ratepayers.

6.3 Did the shortlist conform to PG&E's RA sales strategy?

The shortlists prepared by PG&E did conform to the RA sales strategy.

Primarily due to increasing CCA load-shifting, PG&E has seen an increasing surplus of RA in PG&E's Bundled Portfolio. PG&E's Bundled Procurement Plan provides for PG&E's goal of providing affordable electric service for its bundled customers. PG&E's RA sales strategy in this Solicitation was to seek to offset its procurement costs by partially monetizing its RA length.

Additionally, due to increasing PG&E needs in Local RA areas, in this Solicitation PG&E executed its plan to aggressively pursue potential outright purchases of Local RA or potential simultaneous sales of Generic RA and purchases of Local RA.

6.4 Reasonableness of the shortlist

In PA's opinion, PG&E's shortlists were reasonable.

7 FAIRNESS OF PROJECT-SPECIFIC NEGOTIATIONS

PA closely monitored the contract negotiations and PG&E gave PA the opportunity to join negotiation teleconferences, provided PA copies of contract drafts, included PA on e-mails, and instructed counterparties to include PA on all communications.

7.1 Principles PA used to evaluate fairness of negotiations

PA applied the following three principles to evaluate the fairness of negotiations:

- PG&E should not show bias toward any bidder by allowing contract conditions not offered to other bidders unless those conditions are balanced by comparable concessions by the bidder;
- PG&E should not negotiate harder or less hard with a bidder than with any other bidder; and
- PG&E should not attempt to impose contract conditions in the negotiation that significantly change the balance of the bargain, relative to what the bidder could have reasonably expected based on the Solicitation protocol materials.

7.2 Describe fairness of negotiations

PA participated in most of the negotiation meetings and received copies of red-lined draft contract documents to review. The negotiations largely consisted of discussions related to the counterparties' desire to avoid collateral requirements by using pre-payments for each RA product period.

PA believes that PG&E treated bidders consistently and fairly relative to each other (the first two principles above).

7.3 What terms and conditions underwent significant changes during the course of negotiations?

PG&E provided bidders a draft RA Confirm agreement with the initial Solicitation materials. Providing draft contracts prior to bid submittal is beneficial for both the bidders and PG&E. Draft contract documents provide bidders more clarity on the product, risk sharing, technical and other factors so that they are able to design and price their offers appropriately. It also can improve PG&E's ability to evaluate the bids when the requirements and parameters are clearly identified as part of the bidding process.

Generally, most counterparties who ultimately executed transactions via the Solicitation are familiar with PG&E's Confirms and the negotiations were straightforward and quickly concluded. To the extent that certain bidders had multiple emails and in some cases telephone conference calls with PG&E, these cases tended to be instances where the counterparty and PG&E were exploring potential offers and counteroffers.

7.4 Was similar information and options made available to other participants?

PA believes that similar information and options were made available to each participant.

8 MERIT OF CONTRACT APPROVAL

PG&E negotiated and signed a total of twenty contracts through this Solicitation, including PG&E purchases and sales in Phase I and Phase II of the Solicitation. These contracts will involve RA sales [REDACTED]

Through the bid evaluation and selection process, PA believes that PG&E selected appropriate offers. Based on the analysis and assumptions described throughout this report, PA recommends approval of these transactions.

Attachment 2

Final Phase I and II Multi-Year RA Solicitation
IE Report
(Confidential)

Advice 5986-E-A
February 5, 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 5986-E-A**

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S
SUPPLEMENTAL ADVICE LETTER 5986-E-A,
Q3 2020 QCR CONFIDENTIAL ATTACHMENT 2:
FINAL PHASE I AND II MULTI-YEAR IE REPORT**

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 February 5, 2021 Supplemental Advice Letter 5986-E-A, Q3 2020 QCR for Confidential Attachment 2 Final Phase I and II Multi-Year RA Solicitation IE Report.
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 February 5, 2021, at San Francisco, California.

/s/

Marianne Aikawa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E-A
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
 FEBRUARY 5, 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
Document: Quarterly Compliance Report Supplemental Advice Letter 5986-E-A			
Confidential Attachment 2: Final Phase I and II Multi-Year RA Solicitation IE Report	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.	3 Years
	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	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