

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 dark ink that reads "Edward Randolph".

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

October 30, 2020

Advice 5986-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

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

Purpose

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) its compliance submittal for Q3 2020 in conformance with PG&E’s 2014 BPP approved in D.15-10-031. PG&E’s submittal of this Procurement Transaction Quarterly Compliance Report (“QCR”) for record period July 1, 2020 through September 30, 2020, (Q3, 2020) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports be submitted within 30 days of the end of the quarter.

Background

In D.07-12-052, the Commission directed Energy Division and the Investor-Owned Utilities (“IOUs”) to continue the collaborative effort to develop a reformatted QCR. The Commission authorized Energy Division to implement a reformatted QCR and to make ministerial changes to the content and format of the report as needs arise. Energy Division and the IOUs finalized the QCR format in December 2008. This QCR is consistent with the final format authorized by Energy Division on December 15, 2008.

Compliance Items

Attachment 1 to this Advice Letter includes a narrative with supporting Confidential Attachments that conforms to the reformatted QCR. The public version of Attachment 1 includes the Narrative, which is not confidential. Attachments 2, 3 and 4 include the public versions of Attachments G and H, respectively. The confidential version of the QCR includes the following supporting Confidential Attachments:

Attachment A: Q3 2020 Electric and Natural Gas Transactions
Attachment B: Q3 2020 Counterparty Information
Attachment C: Q3 2020 Electric Transactions Summary
Attachment D: Q3 2020 Natural Gas Transactions Summary

Attachment E: Q3 2020 Other Transactions
Attachment F: Q3 2020 Key Briefing Packages
Attachment G: Q3 2020 Independent Evaluator (IE) Reports
Attachment H: Q3 2020 Contracts Executed/Contracts Amended
Attachment I: Q3 2020 Summary of Retained Generation Investments Completed
Attachment J: System Load Requirements/Conditions
Attachment K: Risk Management Strategy Communication and Management Disclosure
Attachment L: Reasonable Number of Analyses Models, Description of Models, and How Models Operate
Attachment M: Q3 2020 Transactions Subject to Strong Showing

Attachment 5 to this Advice Letter includes confidentiality declarations and a matrix.

The public version of this QCR is provided to the service lists for Rulemakings ("R.") 16-02-007. The confidential version of the QCR is provided to PG&E's Procurement Review Group.

This submittal will 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*****

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than November 19, 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

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is November 29, 2020, which is 30 days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter excluding the confidential appendices is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for R.16-02-007. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail 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. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

/S/

Erik Jacobson
Director, Regulatory Relations

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

Public Attachments:

Attachment 1: Narrative

Attachment 2: Attachment G-1 (Public Version)

Attachment 3: Attachment G-2 (Public Version)

Attachment 4: Attachment H (Public Version)

Attachment 5: Confidentiality Declarations and Matrix



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

Tier Designation: 2

Subject of AL: 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: Jay Bukowski (415) 973-1727, John Ulloa (415) 973-0535

Resolution required? ☐ Yes ☒ No Marianne Aikawa (415)973-0375

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

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

Attachment 1

Narrative

PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT
FOR THE THIRD QUARTER OF 2020

October 30, 2020

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Summary of Public Attachments

- Public Attachment G: *Independent Evaluator Reports*, provides any relevant Independent Evaluator (IE) report(s) completed during the Quarter redacted to protect confidential information.
- Public Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter redacted to protect confidential information.

Summary of Confidential Attachments

- Confidential Attachment A: *Transactions*, provides a summary of all transactions executed during the Quarter, which are less than five years in length and that have not been filed through a separate advice filing or application.
- Confidential Attachment B: *Counterparty Information*, provides a summary of (1) all non-investment grade counterparties with whom PG&E transacted; and (2) the top 10 counterparties by volume during the Quarter.
- Confidential Attachment C: *Electric Transactions Summary*, provides a summary of the electric transactions executed during the Quarter.
- Confidential Attachment D: *Natural Gas Transactions Summary*, provides a summary of the gas transactions executed during the Quarter.
- Confidential Attachment E: *Other Transactions*, provides the executed transactions resulting from non-energy-related products during the Quarter.
- Confidential Attachment F: *Key Briefing Packages*, provides a summary of all relevant Procurement Review Group (PRG) agendas and presentations presented.
- Confidential Attachment G: *Independent Evaluator Reports*, provides any relevant IE report(s) completed during the Quarter.
- Confidential Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter.

Summary of Confidential Attachments
(Continued)

- Confidential Attachment I: *Summary of Retained Generation Investments Completed*, provides a summary of any investments related to retained generation facilities and multiple contracts for the same supplier, resource or facility, consistent with the requirements of D.07-01-039.
- Confidential Attachment J: *System Load Requirements/Conditions*, provides a summary of all information related to addressing PG&E's residual net open position.
- Confidential Attachment K: *Risk Management Strategy Communication and Management Disclosure*, provides a summary of all procurement-related risk strategies and issues communicated to PG&E's senior management.
- Confidential Attachment L: *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*, provides a summary of any models related to the relevant transactions identified in this filing.
- Confidential Attachment M: *Transactions Subject to Strong Showing*, provides a summary and supporting documentation for strong showing transactions.

A. Introduction

As required by Ordering Paragraph (OP) 8 of Decision (D.) 02-10-062, and clarified in D.03-06-076, D.03-12-062, D.04-07-028, D.04-12-048 and D.07-12-052, Pacific Gas and Electric Company (PG&E) hereby provides its report demonstrating that its procurement-related transactions during the period July 1, 2020 through September 30, 2020 (Quarter), were in compliance with PG&E's Bundled Procurement Plan (BPP or Plan) approved by the California Public Utilities Commission (CPUC or Commission) in D.15-10-031.

PG&E manages its transactions in compliance with its BPP. During the Quarter, PG&E had the following BPP activity updates:

- Advice Letter 5884-E: Updates to Pacific Gas and Electric Company's Bundled Procurement Plan – Risk Management Policy and TeVAR Methodology (Appendix N); Procurement Processes and Methods (Appendix B); Procurement Review Group, Cost Allocation Mechanism Group, and Independent Evaluator Administration (Appendix M); and Sales Framework (Appendix S), submitted July 20, 2020 was approved on August 18, 2020.
- Advice Letter 5885-E: Update to Appendix J Brokerages and Exchanges, submitted July 20, 2020 was approved on September 3, 2020.
- Advice Letter 5905-E: Updates to Procurement Products (Appendix A); Procurement Processes and Methods (Appendix B); and Sales Framework (Appendix S), submitted August 5, 2020.
- Advice Letter 5930-E: Carbon Free Energy (Appendix P), submitted August 27, 2020.

B. Summary

During the Quarter, PG&E engaged in the following procurement activities in accordance with its BPP-approved procurement methods and practices:

- 1. Competitive Solicitations (Approval Through the Quarterly Compliance Report)**
 - a. None for the Quarter.

2. Other Competitive Solicitations (Approval Through Separate Advice Filing or Regulatory Process)

PG&E is seeking approval for BPP products through separate advice filings or other regulatory processes and are referenced here for informational purposes only:

- a. Bioenergy Market Adjusting Tariff (bi-monthly auctions), ongoing
- b. Renewable Market Adjusting Tariff (ReMAT) (bi-monthly auctions)¹
- c. Winter Regional Renewable Choice Request for Offers (RFO) (aka Enhanced Community Renewables (issued November 13, 2018)
- d. 2020 System Reliability Request for Offers (SR RFO Phase 1) (issued February 28, 2020)
- e. 2020 Spring Disadvantaged Communities Solicitation (issued March 5, 2020)
- f. Spring 2020 Bundled RPS Energy Sale Solicitation (issued April 10, 2020)
- g. 2020 System Reliability Request for Offers (SR RFO Phase 2) (issued July 10, 2020)

3. Other Procurement Activities (Approval Through the Quarterly Compliance Report)

PG&E also seeks approval of transactions executed from the following procurement activities, other than competitive solicitations, through the Quarterly Compliance Report (QCR).

a) Electric Transactions

- i. California Independent System Operator (CAISO) Allocations and Auctions*
 - a. CAISO Monthly Congestion Revenue Rights (CRR) Allocation Processes
 - b. CAISO 2021 Annual CRR Tier 1 Allocation and Long-Term Tier Allocation Processes
- ii. CAISO Markets and Processes*
 - b. Convergence Bidding
- iii. Direct Bilateral Contracting for Short-Term Products*
- iv. Bilateral Negotiated Contracts*
- v. Electronic Solicitations issued by PG&E*
- vi. Market Request for Proposal (RFP)*

¹ The ReMAT Program was suspended on December 15, 2017 by the Executive Director of the CPUC.

vii. *Carbon Free Energy Sales*

viii. *Transparent Exchange*

b) *Gas Transactions*

i. *Transparent Exchanges*

ii. *Direct Bilateral Contracting for Short-Term Products*

iii. *Voice Brokers*

iv. *Electronic Solicitations*

v. *Cashouts*

These procurement activities are described in greater detail in Section C.3, below.

4. Other Procurement Activities (Approval Through Separate Advice Filing or Regulatory Process)

During the Quarter, approval of contracts resulting from the following procurement activities was requested through separate advice filings or regulatory processes and are referenced here for informational purposes only:

- a. Bilaterally negotiated contracts or amendments executed pursuant to other regulatory requirements.
 - i. None for the Quarter.
- b. Qualifying Facility (QF) contracts or amendments executed pursuant to other regulatory requirements.
 - i. None for the Quarter.

C. Master Data Request (MDR) Documentation

D.02-10-062, Appendix B, as clarified by D.03-06-076, sets forth specific elements to be addressed in this report. Each element is discussed below.

1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.

All procurement-related activity during the Quarter was approved and executed either by, or under the direction of, Fong Wan, Senior Vice President, Energy Policy and Procurement; Gillian Clegg, Senior Director, Electric and Gas Acquisition; Martin Wyspianski, Senior Director, Energy Portfolio Procurement and Policy; Marino Monardi, Director, Structured Energy Transactions; Scott Ranzal, Director, Portfolio

Management; Chris McNeece, Director, Short-Term Electric Supply; and/or John Ulloa, Manager, Electric Gas Supply consistent with the delegation of authority effective for the period.

2. The briefing package provided to the ultimate decision maker.

The “decision-maker” for a particular contemplated transaction depends on many factors, such as term, volume, and notional value. For many of the transactions during the Quarter, the “decision-maker” was a gas or power trading employee executing transactions per an established plan or to achieve a particular objective (such as balancing the portfolio supply and demand). For such transactions, briefing packages are not prepared. Briefing packages prepared during the Quarter for transactions or procurement activities that required senior management approval are included in Confidential Attachment K. In addition, copies of presentations made by PG&E to its PRG during the Quarter are included in Confidential Attachment F.

3. Description of and justification for the procurement processes used to select the transactions.

a) Electric Procurement – Description

PG&E is authorized to use any of the following BPP-approved electricity procurement transaction processes during the Quarter:

- Competitive Solicitations
- CAISO Allocations and Auctions
- CAISO Markets and Process
- Direct Bilateral Contracting for Short-Term Products
- Bilateral Negotiated Contracts
- Electronic Solicitations issued by PG&E
- Market RFP
- Carbon Free Energy Sales
- E-Solicitation, Transparent Exchanges, Voice and On-Line Brokers
- Qualifying Facility/Combined Heat and Power (QF/CHP) Amendments Executed under the Combined Heat and Power (CHP) Settlement
(for informational purposes only)

- Pro forma contracts executed under the CHP Feed-In Tariffs Program
(*for informational purposes only*)

b) Electric Procurement – Justification

- For competitive solicitations held by PG&E, describe the process used to rank offers and select winning bid(s).*

None for the Quarter.

- For other transactional methods, provide the documentation supporting the selection of the chosen products.*

The approved procurement processes used during the Quarter and supporting documentation include the following:

- CAISO Allocations and Auctions

CAISO Monthly CRR Allocation Process

PG&E procures CRRs to narrow the distribution of PG&E's energy procurement costs due to expected electric transmission congestion. PG&E obtains CRRs, subject to risk assessment, for specific source/sink combinations as approved in its BPP.

PG&E acquires CRRs for any path (represented by a source-sink pair) connecting existing generation sources to existing loads (e.g., retail loads and Helms pumping load) or for any path that PG&E reasonably anticipates that it might need to flow energy in the future due to the addition of new contracts, resources or load obligations. Additionally, there may be CRRs which are positively correlated in value with CRRs for paths that have limited availability. PG&E is also authorized to acquire CRRs for such positively correlated paths.

PG&E estimated that a portion of its generation, imports and load in the months of August 2020, September 2020, and October 2020, remained exposed to congestion risk, and, therefore, participated in the CAISO's monthly CRR allocation process to obtain CRRs to mitigate this risk. In July 2020, August 2020, and September 2020, PG&E participated in the CAISO's monthly CRR allocation processes to procure CRRs for August 2020, September 2020, and October 2020, respectively.

- CAISO 2021 Annual CRR Allocation Process

PG&E participated in the 2021 Tier 1 and Long-Term Tier Allocation Processes. Awards from Tier 1 were posted on September 15, 2020, and for the Long-Term Tier on September 30, 2020. Results from these will be available in the next QCR.

PG&E's procurement during the Quarter was consistent with PG&E's updates to its BPP CRR (Appendix I) filed in Advice Letter 5473-E, effective May 30, 2019.

Relevant information for the Monthly CRRs is included in Confidential Attachments F, J and L.

- CAISO Markets and Processes

- Convergence Bidding

- PG&E suspended Convergence Bidding activities after trade day May 26, 2018. As of September 30, 2020, all Convergence Bidding activities remain suspended. Relevant information is included in Confidential Attachment E, F and J.

- Direct Bilateral Contracting for Short-Term Products

- Transmission capacity is purchased to relocate power from one point to another, often necessary outside a Regional Transmission Operator such as the CAISO. Relevant information is included in Confidential Attachment A.

- Bilateral Negotiated Contracts

- Resource Adequacy (RA) – During the Quarter, PG&E executed transactions consisting of the following types: (1) System RA purchase transactions; (2) System RA sales transactions; (3) System Flexible RA sales transactions; (4) Local RA sale transactions; (5) Import Allocation Rights purchase transactions; (6) Import Allocation Rights sale transactions. Relevant information is included in Confidential Attachment E, F, H and M.

- Electronic Solicitations issued by PG&E

- Import Energy – During the Quarter, PG&E executed firm energy transactions at selected import delivery locations. Relevant information is included in Confidential Attachment A.

- Resource Adequacy (RA) – During the Quarter, PG&E executed the following transaction types: (1) System RA purchase transactions; (2) System RA sale transactions; (3) Local RA purchase transactions; (4) Local RA sale transactions; (5) Local Flexible RA purchase transactions; (6) Local Flexible RA sale transactions; and (7) Import Allocation Rights sale transactions. Relevant information is included in Confidential Attachments E, F, H and L.

The RA and Import Energy transactions were monitored by an Independent Evaluator (IE) in two E-Solicitations: (1) 2020 Balance of Year RA and Import Energy Sales, and 2021-2022 RA Purchase E-Solicitation (a.k.a. Q4 BoY Solicitation), and (2) PG&E 2020 Multi-Year RA Solicitation Phase 1. The final 2020 Multi-Year IE Report will be available upon conclusion of Phase 2 of this Solicitation in Q4 2020. PG&E will supplement this Advice Letter filing with the final IE report. PG&E has included in this Advice Letter a Project Status Memo written by the IE

regarding the transactions executed this Quarter. Relevant information is included in Confidential Attachment G.

- Market RFP – During the Quarter, PG&E did not execute any Market RFP transactions.
- Carbon Free Energy Sales – During the Quarter, PG&E executed transactions associated with its offer of 2020 Carbon Free Energy Sales to eligible LSEs in accordance with its CPUC approved BPP, Appendix P. Relevant information is included in Confidential Attachments E, F, and H.
- E-Solicitation, Transparent Exchange, or Voice and On-Line Brokers – During the Quarter, PG&E did not execute electric financial transactions via E-Solicitation or Transparent Exchange (including voice and on-line brokers). Relevant information is included in Confidential Attachments A and L.
- QF/CHP Legacy Contracts (for informational purposes only)

Under the QF/CHP Program, QF generators may enter into one of two pro forma Power Purchase Agreements (PPA) (i.e., Public Utility Regulatory Policies Act PPA for QFs up to 20 megawatts (MW), and As-Available PPA for CHP up to 20 MW. In addition, many of the remaining legacy QF contracts are still active and may require amendments or letter agreements to help the generator meet the requirements of the Commission’s CHP Program (e.g., greenhouse gas (GHG) administration and metering issues) that were not required under the former program. Relevant information is included in the “Informational Purposes Only” Section of Attachment H.

- CHP Feed-In Tariffs (for informational purposes only)

Under the Waste Heat and Carbon Emissions Act, codified as California Public Utilities Code (Pub. Util. Code) Section 2840 et seq. (Stats. 2007, Ch. 713), the Commission established a standard tariff for the sale of electricity from efficient CHP systems under 20 MW and directed the electrical corporations to purchase excess electricity from eligible CHP generators. A CHP generator that is certified by the California Energy Commission (CEC) is eligible under the CEC’s legal and technical guidelines to obtain a CHP feed-in tariff. In D.09-12-042, the Commission approved three pro forma contracts for use with CHP systems (known as “AB 1613 PPAs”) that are applicable to generators of different sizes: a standard contract for CHP generators up to 20 MW, a simplified PPA for CHP generators less than 5 MW, and a further simplified PPA for smaller CHP systems under 500 kilowatts. Relevant information is included in the “Informational Purposes Only” section of Attachment H.

c) Natural Gas Procurement – Description

PG&E procured natural gas during the Quarter using various BPP-approved procurement processes and methods, including:

- Competitive Solicitations
- Transparent Exchanges
- Direct Bilateral Contracting for Short-Term Products
- Voice and On-Line Brokers
- Electronic Solicitations
- Cashouts

d) Natural Gas Procurement – Justification

- i. For competitive solicitations (RFOs), describe the process used to rank offers and select winning bid(s).*

PG&E did not execute any contracts during this Quarter through competitive solicitations for approval through this QCR.

- ii. For other transactional methods, provide the documentation supporting the selection of the chosen products.*

- Transparent Exchanges: Electronic trading exchanges for transparent prices:

Commodity Purchases/Sales – PG&E buys and sells physical natural gas on Intercontinental Exchange (ICE) and the ICE Natural Gas Exchange (ICE/NGX) physical clearing service. ICE is an electronic system that matches buyers and sellers of natural gas products. Once buyer and seller are matched, ICE trades become bilateral trades. ICE/NGX trades are cleared by NGX, rather than bilaterally. Physical transactions in the Quarter include next-day and same-day transactions, for delivery periods of one to five days, and monthly transactions for deliveries each day of a calendar month. Relevant information of transactions executed via Transparent Exchanges during the QCR period is included in Confidential Attachment A.

Gas Financial Transactions – PG&E's procurement during the Quarter is consistent with PG&E's updates to its BPP Hedging Plan (Appendix E) filed in Advice Letter 5704-E.

Gas Financial Transactions are cleared through exchanges (ICE or the New York Mercantile Exchange (NYMEX)). ICE and NYMEX provide access to anonymous bids and offers establishing both a liquid and robust market for financial products, and a benchmark for over-the-counter products. These products include Henry Hub futures and options, and basis futures against the industry benchmark indices, including Gas Daily, Natural Gas Intelligence (NGI) and Inside Federal Energy Regulatory

Commission (IFERC) Gas Market Report. Details demonstrating PG&E's compliance with D.15-10-031 during the QCR period are included in Confidential Attachments J and L. Relevant information executed during the QCR period is included in Confidential Attachment A.

- Direct Bilateral Contracting for Short-Term Products

Commodity Purchases/Sales – PG&E buys and sells physical gas directly with counterparties in the bilateral market. Spot gas (deliveries less than one month) is traded at fixed prices and daily index (Gas Daily). Prompt month supply (deliveries each day of the following month) and term gas (greater than one month forward or one month in duration) is traded at fixed price, daily index (Gas Daily), or monthly or bi-week index (NGI, or IFERC) prices. For any bilateral physical supply trades with a term of one month, PG&E concluded these transactions bilaterally, but also used electronic solicitation methods, such as instant messaging, e-mail, voice solicitation (telephone), Real-Time Market (RTM) prices, and/or broker quotes, to inform and conduct these transactions. Relevant information executed during the QCR period is included in Confidential Attachments A, J and M.

- Voice and On-Line Brokers – Gas Financial Transactions

PG&E executes natural gas financial transactions (futures) through voice brokers that resulted in exchange-cleared trades. Brokers provide access to anonymous bids and offers from both over-the-counter parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled over-the-counter or cleared through NYMEX or ICE. The broker market trades the same financial products as the exchanges. Relevant information of transactions executed via voice brokers during the QCR period is included in Confidential Attachment A.

- Voice and On-Line Brokers – Commodity Purchases/Sales

PG&E executes physical gas supply transactions through voice brokers that resulted in transactions. Brokers provide access to anonymous bids and offers from both over-the-counter parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled over-the-counter or cleared through NGX. The broker market trades the same products as the bilateral market. Relevant information of transactions executed via voice brokers during the QCR period is included in Confidential Attachment A.

- Electronic Solicitations

Conducted via Instant Messaging and Telephone – PG&E conducts electronic solicitations for the purchase or sale of physical gas supply, with delivery terms ranging from a single day, to one month or longer, using instant messaging and telephone. In this way, PG&E is able to

obtain robust price quotes from the marketplace, in real time, and may then execute with the counterparty with the best bid(s) or offer(s). Relevant information of transactions executed via electronic solicitation during the QCR period is included in Confidential Attachment A.

- Cashouts: Commodity Purchases/Sales

Cashouts are used by gas pipelines, according to their tariff, to cure certain imbalances between supply and demand. When a pipeline applies a cashout, it results in a commodity transaction. Relevant information of transactions during the QCR period is included in Confidential Attachment A.

e) GHG and Other Commodities

i. For competitive solicitations, describe the process used to rank offers and select winning bid(s).

- PG&E did not execute any contracts during this Quarter through competitive solicitations for approval through this QCR.

ii. For other transactional methods, provide the documentation supporting the selection of the chosen products.

- PG&E received its annual allocation of Electric Distribution Utility (EDU) Current Vintage allowances for the 2020 year from the California Air Resources Board (CARB) in October 2019. All of the EDU allowances will be consigned into the 2020 CARB Auctions as required by the regulations and consistent with PG&E's BPP. CARB and Québec's ministère du Développement durable, de l'Environnement et de la Lutte contre les changements climatiques held a joint allowance auction on August 18, 2020, for Current 2020 Vintage and Advance 2023 Vintage allowances.
- PG&E is authorized to procure GHG products through CARB Auctions and other CPUC-approved procurement processes and methods. PG&E provided information regarding its bilateral market procurement strategy to the PRG.
- PG&E's procurement during the Quarter was consistent with PG&E's Conformed BPP GHG Procurement Plan filed in Advice Letter 5579-E, effective July 1, 2019.

All relevant GHG transactional information and supporting justification is included in Confidential Attachments E and L.

4. Explanation/justification of the timing of the transactions.

a) Electric Transactions

When selecting electric transactions, the best-priced bids/offers are selected first (merit-order selection) among those available for the required products at the time of the transaction, subject to credit and other limitations and operational constraints. Detailed explanation/justification for the timing of the transactions is included in Confidential Attachment J.

b) Natural Gas Transactions

For daily physical gas transactions, timing of execution is primarily driven by the requirement to match fuel usage by utility-owned and contracted electric generating units and supply delivered on a daily and monthly basis, and by the availability of information impacting expectations for daily dispatch of these units. For transactions one month or longer, PG&E typically fills its forecast short gas positions in month-ahead, seasonal, or annual blocks, depending on the liquidity and prices available in each of these markets. Execution of term transactions was based on the PG&E Electric Portfolio Quarterly Position Update, presented to the PRG on June 30, 2020. Documentation supporting the timing of transactions is included in Confidential Attachment J.

5. Discussion of the system load requirements/conditions underlying the need for the Quarter's transactions.

a) PG&E Participation in the CAISO Markets

PG&E participates in the CAISO Day-Ahead and RTMs. PG&E's day-ahead planning and procurement incorporates weather-adjusted load forecasts, resource availability, price forecasts, dispatch costs and current bilateral electric market and forecasts of the CAISO's Integrated Forward Market (IFM) prices. The results of this process allow PG&E to determine the incremental costs of dispatchable resources that are bid into the IFM and the RTM. It also determines the price upon which PG&E is willing to pay the CAISO for meeting its hourly load. The CAISO

then assures least cost dispatch by considering all resources simultaneously with all transmission constraints.

In the RTM, similar to the day-ahead market, PG&E submits resource bids and schedules into CAISO markets and those resources that clear the market will be obligated to operate in real time.

b) PG&E-Owned Generation Conditions During Q3 2020

PG&E received 8.5 percent of normal rainfall during the Quarter.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as system conditions and economics allowed. There were no planned or maintenance outages at Helms during the Quarter lasting longer than 72 hours. Additionally, there were no forced outage events at Helms longer 24 hours during the Quarter.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Bucks Creek Units 1 and 2 (55 MW total), Drum 1 Unit 3 and 4 (27.6 MW total), Drum 2 Unit 5 (49.5 MW), Pit 1 Unit 1 (30.5 MW), Pit 3 Unit 2 and 3 (46.7 MW total), Pit 5 Unit 4 (40 MW), Pit 6 Unit 1 and 2 (80 MW total), and Salt Springs Unit 1 and 2 (44 MW total). Four of the planned outages started in the previous Quarter and ten outages will continue into the next Quarter. In addition, there were five maintenance outages lasting longer than 72 hours which included: Balch 2 Unit 2 (52.5 MW), Butt Valley (41 MW), Caribou 2 Unit 4 and 5 (120 MW total). Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW during the Quarter were incurred at the following facilities: Belden (125 MW), Butt Valley (41 MW), Caribou 1 Unit 1, 2 and 3 (75 MW total), Caribou 2 Unit 4 and 5 (120 MW total), Drum 1 Unit 1, 2, 3 and 4 (54 MW total), Drum 2 Unit 5 (49.5 MW), Kerckhoff 2 (155 MW), Pit 1 Unit 2 (30.5 MW), Pit 3 Unit 1, 2 and 3 (70 MW total), and Pit 7 Unit 2 (56 MW).

At PG&E's fossil combined cycle facilities there were no planned or maintenance outages longer than 72 hours for the Quarter. Additionally, there were no forced outages greater than 24 hours.

At PG&E's Humboldt Bay Generating Station there was one planned outage longer than 72 hours during the Quarter. This was for a major overhaul on Engine 4. There were three maintenance outages lasting longer than 72 hours during the Quarter on Unit 5, Unit 6, and Unit 8. There were no forced outage events at Humboldt Bay Generating Station lasting longer than 24 hours during the Quarter.

During third Quarter 2020, Diablo Canyon Power Plant Unit 1 operated at 99.35 percent capacity factor. No generation-impacting events occurred during this quarter.

During third Quarter 2020, Diablo Canyon Power Plant Unit 2 operated at 82.68 percent capacity factor. One generation-impacting event occurred during the third quarter. During July and August, Unit 2 performed an unplanned shutdown of the unit to perform maintenance on hydrogen piping inside the main generator. Unit 2 operated at full power during the remainder of third quarter.

6. Discussion of how the Quarter's transactions meet the goals of the risk management strategy reflected in the Plan.

As described in Sections 3.b. and 3.d. above, during the Quarter, PG&E executed transactions in accordance with its Hedging Plan. A list of relevant information regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachments F and K.

7. Copy of each contract.

A list of transactional contracts executed and/or modified by PG&E during the Quarter is included in Confidential Attachment H. Copies of the contracts PG&E seeks approval of through this QCR are also included in this attachment.

8. The valuation results for the contract(s) (for contracts of three months or greater duration).

PG&E provides the valuation method and results for the contracts filed via this QCR in Confidential Attachment H.

9. An electronic copy of any data or forecasts used to analyze the transactions.

Because transaction personnel are continuously monitoring a wide range of market information on a 24-hour-per-day, 7-day-per-week basis, it is not feasible to provide all the data and forecasts used to analyze all potential and executed transactions. However, key analysis data utilized during the Quarter is in Confidential Attachment J.

10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.

To the extent any analyses requested by the Commission or PRG during the Quarter were not already included as a part of PG&E's response to Items 1 through 9 above, such additional analyses would be contained in Confidential Attachment F.

11. Any other information sought by the Commission under the Pub. Util. Code.

To the extent that the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) has requested information for the Quarter as identified in its MDR, this information will be included in PG&E's MDR response and submitted to the Cal Advocates 14 days after the filing of the QCR. In addition, the Commission's Energy Division has requested that PG&E provide transparent exchange traded prices. PG&E has included this information in Confidential Attachments A and E.

D. Additional Reporting Requirement Pursuant to D.07-01-039

As required by OP 12 of D.07-01-039, PG&E has included in Confidential Attachment I, investments in retained generation that were completed during the Quarter, as well as any multiple contracts of less than five years with the "same supplier, resource or facility" as required in D.07-01-039 on page 154. There were no transactions or investments to report during the Quarter.

E. Cost Allocation Mechanism (CAM)

For the Quarter, PG&E did not execute any contracts qualifying for CAM.

Attachment 2

Attachment G-1 (Public Version)



2020 Q4 AND 2021-2022 RESOURCE ADEQUACY AND IMPORT ENERGY SOLICITATION INDEPENDENT EVALUATOR REPORT

PREPARED FOR PACIFIC GAS & ELECTRIC

October 2020

Bringing Ingenuity to Life
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INDEPENDENT EVALUATOR REPORT

PA Consulting Group, Inc. (PA) served as the Independent Evaluator for the Pacific Gas and Electric Company (PG&E) 2020 Q4 Balance of Year and 2021-22 Resource Adequacy and Import Energy E-Solicitation (2020 BoY and 2021-22 RA and Import Energy E-Solicitation or the E-Solicitation). This report provides a summary of PA's evaluation of the process from the drafting of the E-Solicitation documents through to the recommendation of selected bids and negotiations of contracts submitted to the California Public Utilities Commission (CPUC or Commission).

Overview of solicitation

In this E-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 October through December 2020 delivery periods; PG&E also sought bids to purchase (i.e., **PG&E sells**) for Import Allocation Rights (IAR) monthly products for the October through December 2020 delivery periods. PG&E sought offers for sale (i.e., **PG&E buys**) of WSPP Schedule C Import Energy (IE) for the October through December 2020 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 25 MW specified.

For simultaneous buy/sell proposals, PG&E noted that it was interested in purchase/sale transactions in the same delivery month. 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. Table 1 below summarizes the products sought in the E-Solicitation.

Table 1. E-Solicitation Products

Product ID	Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
1	Local/System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Oct-Dec 2020	Fixed Price \$/kW-month
2	Local RA	Buy	1 MW	Jan 2021-Dec 2022	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Oct-Dec 2020	Fixed Price \$/kW-month
4	Import Energy	Buy	25 MW	Oct-Dec 2020	CAISO LMP, ICE Index, or Fixed Price \$/MWh

PG&E received [REDACTED] to the E-Solicitation and contracted for [REDACTED]
[REDACTED] PG&E received [REDACTED] IAR [REDACTED] to the E-Solicitation and contracted for [REDACTED]. PG&E received [REDACTED] IE [REDACTED] to the E-Solicitation and contracted for [REDACTED]
[REDACTED]
[REDACTED]

Main Independent Evaluator activities during solicitation

PA's role in PG&E's 2020 BoY and 2021-22 RA and Import Energy E-Solicitation spanned approximately four weeks in July 2020. PA performed the role of Independent Evaluator and was involved from PG&E's development of the Market Notice materials through the submittal of the bids/offers and ultimately the negotiation of the [REDACTED] confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in its E-Solicitation and provided fair and equitable treatment of all bids/offers. 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. The following provides a summary of PA's main activities during this solicitation:

- PA reviewed the E-Solicitation's Market Notice prior to PG&E's issuance and had no substantial comments or suggested edits to the Notice. PA has provided Independent Evaluator services as PG&E has issued several Solicitations for RA, IAR, and IE beginning in 2018 and throughout this time, PG&E has continually refined its processes, including the development of a straightforward Market Notice template.
- PA received all communications between PG&E and bidders. PA directly received all of the emails, including bids/offers that were sent to and received from bidders. In this E-Solicitation, the Independent Evaluator's email was provided incorrectly in the Market Notice issuance to potential counterparties. As a result, the Independent Evaluator was initially omitted from the bid submittals. Upon realization of this issue, PG&E provided all bids to the Independent Evaluator and corrected the issue on all future communications with bidders.
- PA reviewed the bids/offers received and negotiation emails with all bidders.
- PA reviewed the draft and executed confirmation documents related to the selected bids/offers.

Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices to PG&E's RA E-Solicitation distribution list as well as its IE distribution list. PG&E has conducted multiple RA and related solicitations in the last several years. In this E-Solicitation, PG&E included additional outreach beyond the initial Market Notices by sending a follow up email to the entire distribution list to provide draft confirms and emphasize the multi-year solicitation period for this E-Solicitation. PA believes market participants are increasingly aware of PG&E's solicitations and that PG&E extended adequate outreach for the 2020 BoY and 2021-22 RA and Import Energy E-Solicitation.

PG&E's Bid Evaluation Methodology

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. Had competing bidders made bids/offers for RA in the same month that exceeded PG&E's available RA or need for RA in that month, PG&E would have selected the higher priced bidder.

Further, there were numerous offers to sell RA which PG&E either manually accepted or rejected based on the following logic to evaluate:

[REDACTED]

[REDACTED]

PA found PG&E's bid/offer evaluation methodology appropriate for this E-Solicitation.

PG&E's Shortlisting and Negotiations of Confirms

The Market Notice for this E-Solicitation specified that PG&E would only contract for RA and IAR products with participants under an EEI Master Agreement. PG&E provided participants its Standard EEI RA Confirm and Import Allocation Rights Confirm. During the confirm negotiations, PG&E provided draft Confirms to each participant specific to their awarded price and volume. The Market Notice also specified that Import Energy offers should be for WSPP Schedule C firm energy.

As noted, PG&E received [REDACTED]

[REDACTED]

[REDACTED]

Ultimately, PG&E contracted through this E-Solicitation [REDACTED].

Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2020 BoY and 2021-22 RA and Import Energy E-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 this E-Solicitation was adequate and that the Market Notice materials were clear and concise related to the E-Solicitation. PG&E quickly cured the incorrect Independent Evaluator issue and ensured that the Independent Evaluator issue was included in all communications.
- PA notes that PG&E has developed increasingly smooth RA and IAR E-Solicitations. In this E-Solicitation, nearly all the bidders have recently contracted with PG&E; the confirm negotiations

were all conducted quickly and via email with no negotiation calls necessary. PA commends PG&E and the counterparties for efficiently completing confirm executions with no delays.

- PA finds that PG&E appropriately [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- 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 BoY and 2021-22 RA and Import Energy E-Solicitation fairly.



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Attachment 3

Attachment G-2 (Public Version)

Memo Report

Subject	2020 MULTI YEAR RESOURCE ADEQUACY SOLICITATION
To	Pacific Gas & Electric
From	Charles Janecek
Date	October 7, 2020

PA Consulting Group, Inc. (PA) is serving as the Independent Evaluator (IE) for the Pacific Gas & Electric (PG&E) 2020 Multi Year Resource Adequacy Solicitation (2020 MY RA Solicitation or the Solicitation). This memo report provides a summary of PA's evaluation of Phase I of the Solicitation from the drafting of the Solicitation documents through the recommendation of the selected bids and negotiations of the confirms that were ultimately executed.

Overview of the Solicitation

Anticipating the likely uncertainty and complexity of the solicitation, PG&E planned to conduct it in two Phases. Phase I was intended to address market needs after the release of the Initial 2021 Year-Ahead RA allocations and NQC lists; Phase II is 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. To address this, PG&E has 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 was 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.

Phase I activities have concluded, with PG&E executing transactions with [REDACTED].

[REDACTED] Phase II of the solicitation was launched on September 18, 2020 with bids due October 5, 2020. PG&E is currently evaluating bids received to the Phase II solicitation.

IE Activities During the Solicitation

PA's role in the Solicitation has been one of continuous involvement from August 2020 through the transaction executions in September 2020. PA performed the role of IE beginning with PG&E's development of the Market Notice and Solicitation materials and continuing through the bid evaluation and shortlisting, EEI and RA Confirm negotiations, and final execution of Confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in the Solicitation protocol documents and provided fair and equitable treatment of all bids.

A complete description of all IE activities conducted during the Solicitation will be included in the final Independent Evaluator report upon conclusion of the Phase II activities.

Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices via email to PG&E's wholesale RFO distribution list and PG&E's e-Solicitation RA list. PA is aware that many entities are currently engaged in RA solicitations and understands that most, if not all, market participants with RA obligations were aware of PG&E's Solicitation. In addition, PG&E notified initial bidders that it was seeking additional Local RA after bids had been submitted. PG&E understood its RA positions clearly and made attempts to cast a wide net to seek counterparties for both sales and purchases of RA during this phase of the Solicitation. PA believes that PG&E extended adequate outreach for Phase I of the 2020 Multi-Year RA Solicitation.

PG&E's Bid Evaluation Methodology

In this Solicitation, the bid evaluations were necessarily complex, as PG&E was evaluating offers for the purchase, sale, and swaps of similar RA volumes from multiple counterparties. PG&E relied upon its internally developed bid optimization model, which sought to optimize value for PG&E ratepayers across all bids. While PA did not conduct a detailed evaluation of each bid and its value to PG&E relative to other bids, PA did conduct reconciliation checks of the initial bids vs. the shortlisted bids compared to the original bids and found PG&E's bid evaluation methodology appropriate for this Solicitation.

PG&E's Shortlisting and Negotiations of Confirm

PG&E received nearly [REDACTED] individual monthly bids/offers in response to the Solicitation, and ultimately shortlisted [REDACTED] counterparties.

The Market Notice for this E-Solicitation had specified that PG&E would only contract with bidders under an EEI Master Agreement and provided a standard RA Confirmation Agreement. During the confirm negotiations, PG&E provided draft Confirms to the bidder specific to the bidder's credit terms and that bidders' bid price and RA products. PA has found that while the 2019 Multi-Year Phase I RA Solicitation involved several negotiations between PG&E and potential counterparties related to executing an EEI Master Agreement, the 2020 Solicitation required no such negotiations as all transacting counterparties already have an executed EEI Master Agreement.

Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2020 Multi-Year Phase I RA Solicitation.

PA's 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 this Solicitation was adequate and that the Market Notice materials were clear and concise related to the Solicitation.
- 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 Phase I of the 2020 Multi-Year Solicitation fairly.

Attachment 4

Attachment H (Public Version)

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 2020**

New Contracts Executed and Amended During the Quarter

The table below provides a summary of Request for Offer (RFO) and Competitive Solicitation contracts executed during this Quarter and filed for CPUC approval via this Procurement Transaction Quarterly Compliance Report (QCR) advice letter. A copy of the contract(s) is included.

Workpapers providing the method for valuation results calculations are included in Confidential Attachment L - Reasonable Number of Analyses Models, Description of Models, and How Models Operate.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
None for the Quarter								

The table below provides a summary of e-solicitation and/or Market RFP contracts executed through competitive processes during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
CCSF, acting by and thru its PUC, CleanPowerSF (33B243S06)	7/30/2020	System RA (Purchase)	N/A		53 MW			Q3 2020 E-Solicitation
CCSF, acting by and thru its PUC, CleanPowerSF (33B243S07)	7/30/2020	Local RA (Sale)			49 MW 4 MW			Q3 2020 E-Solicitation

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
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Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name		
Marin Clean Energy (33B235U01)	8/13/2020	Local, Flexible RA (Purchase)			45 MW 45 MW			Q3 2020 E- Solicitation		
Marin Clean Energy (33B235U02)	8/13/2020	Local, Flexible RA (Sale)			9 MW 9 MW 9 MW 9 MW 9 MW 9 MW 9 MW 9 MW 9 MW			Q3 2020 E- Solicitation		
Peninsula Clean Energy Authority (33B232U01)	9/14/2020	Local RA (Sale)			10 MW 10 MW 10 MW 10 MW 11 MW 4 MW 10 MW			Q3 2020 E- Solicitation		
		Local, Flexible RA (Sale)			41 MW 42 MW 40 MW 46 MW 2 MW 31 MW 31 MW 11 MW 19 MW 4 MW 34 MW 16 MW 37 MW			Q3 2020 E- Solicitation		
Silicon Valley Clean Energy Authority (33B230T01)	9/14/2020	System RA (Purchase)			N/A			18 MW 18 MW	Q3 2020 E- Solicitation	
Silicon Valley Clean Energy Authority (33B230T02)	9/14/2020	Local RA (Sale)							18 MW 18 MW 20 MW 82 MW 20 MW 53.99 MW 20 MW 64 MW 6 MW 74 MW	Q3 2020 E- Solicitation
East Bay Community Energy Authority (33B238T01)	9/15/2020	Import Allocation Rights (Sale)							N/A	33 MW 33 MW

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Sonoma Clean Power Authority (33B226U01)	9/15/2020	Local RA (Sale)			3.3 MW 3.3 MW 3.3 MW 3.3 MW			Q3 2020 E- Solicitation
Exelon Generation Company, LLC (33B251T04)	9/15/2020	System RA (Sale)	N/A		52 MW 173 MW			Q3 2020 E- Solicitation
		Local RA (Sale)			3 MW 3 MW 3 MW 3 MW			
East Bay Community Energy Authority (33B238U02)	9/16/2020	Local RA (Sale)			3.8 MW 100.77 MW 135 MW 6.98 MW 2.59 MW 50 MW 58.35 MW 23.99 MW			Q3 2020 E- Solicitation
Central Coast Community Energy (3CE) (33B236U02) Formerly called <i>Monterey Bay Community Power</i>	9/16/2020	Local, Flexible RA (Sale)			20 MW 20 MW			Q3 2020 E- Solicitation
		Local RA (Sale)			14 MW 4 MW			
City of San Jose (San Jose Clean Energy) (33B247T01)	9/17/2020	Import Allocation Rights (Sale)	N/A		62.3 MW 62.3 MW			Q3 2020 E- Solicitation
City of San Jose (San Jose Clean Energy) (33B247T02)	9/17/2020	System RA (Purchase)	N/A		5.95 MW 12.55 MW			Q3 2020 E- Solicitation
		Local, Flexible RA (Sale)			4.7 MW			
City of San Jose (San Jose Clean Energy) (33B247T03)	9/17/2020	Local RA (Sale)			5.95 MW 12.55 MW 3 MW 83.2 MW 0.16 MW 4.54 MW 3 MW 83.2 MW 3 MW 83.2 MW			Q3 2020 E- Solicitation

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Calpine Energy Services, L.P. (33B029U03)	9/17//2020	Local RA (Purchase)			1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW			Q3 2020 E- Solicitation
Calpine Energy Services, L.P. (33B029U04)	9/17/2020	Local RA (Sale)			1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW 1 MW			Q3 2020 E- Solicitation
CCSF, acting by and thru its PUC, CleanPowerSF (33B243U01)	9/22/2020	Local RA (Sale)			2 MW 2 MW 68 MW 2 MW 2 MW 68 MW 0.66 MW 0.66 MW 22.66 MW 2 MW 2 MW 68 MW 2 MW 2 MW 68 MW 2 MW 68 MW 68 MW 64 MW			Q3 2020 E- Solicitation

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q3 2020

The table below provides a summary of bilateral contracts (including GHG offset transactions facilitated by brokers), and significant exchange-placed trades, (including RA transactions facilitated by brokers) executed during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
City of San Jose (San Jose Clean Energy) (33B247S06)	7/9/2020	System RA (Sale)	N/A		72 MW			Q3 2020 Bilateral
East Bay Community Energy Authority (33B238S12)	7/14/2020	System RA (Sale)	N/A		25 MW			Q3 2020 Broker
San Diego Gas and Electric (33B256S01)	7/15/2020	System RA (Sale)	N/A		60 MW			Q3 2020 Broker
EDF Trading North America, LLC (33B200S03)	7/16/2020	System RA (Sale)	N/A		3.65 MW			Q3 2020 Broker
Calpine Energy Services, L.P. (33B029S01)	7/17/2020	Import Allocation Rights (Sale)	N/A		22 MW			Q3 2020 Broker
Southern California Edison Company (33B217S07)	7/17/2020	Import Allocation Rights (Purchase)	N/A		25 MW			Q3 2020 Broker
Direct Energy Business Marketing, LLC (33B241S03)	7/17/2020	System RA (Sale)	N/A		11.58 MW			Q3 2020 Broker
Direct Energy Business Marketing, LLC (33B241S04)	7/17/2020	Import Allocation Rights (Sale)	N/A		73 MW			Q3 2020 Broker

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
3 Phases Renewables, Inc. (33B113S06)	8/5/2020	System, Flexible RA (Sale)	N/A		1 MW			Q3 2020 Bilateral
3 Phases Renewables, Inc. (33B113S07)	8/5/2020	System RA (Purchase)	N/A		3 MW			Q3 2020 Bilateral
CCSF, acting by and thru its PUC, CleanPowerSF (33B243S08)	8/5/2020	Local RA (Sale)			4 MW			Q3 2020 Bilateral
CCSF, acting by and thru its PUC, CleanPowerSF (33B243S09)	8/5/2020	System RA (Purchase)	N/A		4 MW			Q3 2020 Bilateral

The table below provides a summary of Carbon Free Energy Contracts executed during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included. Carbon Free Energy is energy produced by large hydroelectric resources and nuclear resources and sold to eligible Load Serving Entities (LSEs).¹

¹ PG&E BPP Advice Letter 5705-E, submitted December 2, 2019, and approved on May 13, 2020, created Appendix P Carbon Free Energy.

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio¹	Net Price²	Notional Value (\$)	Confirm File Name
Sonoma Clean Power Authority (33B226CA01)	7/1/2020	Carbon Free Energy (Sale)		July-20 August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy
Pioneer Community Energy (33B245CA01)	7/1/2020	Carbon Free Energy (Sale)		July-20 August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy
Direct Energy Business LLC (33B255CA01)	7/1/2020	Carbon Free Energy (Sale)		July-20 August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy
Pilot Power Group, Inc.(33B239CA01)	7/10/2020	Carbon Free Energy (Sale)		August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy
Valley Clean Energy Alliance (33B254CA01)	7/10/2020	Carbon Free Energy (Sale)		August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy
City Of King dba King City Community Power (33B257CA01)	7/10/2020	Carbon Free Energy (Sale)		August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy
Tiger Natural Gas, Inc. (33B258CA01)	7/10/2020	Carbon Free Energy (Sale)		August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy

¹ Monthly percentage of the Buyer's PCIA Load Share.

² Price nets to zero because eligible LSEs pay for these MWhs through PCIA and PG&E is retaining all CAISO revenues.

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q3 2020

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio ¹	Net Price ²	Notional Value (\$)	Confirm File Name
Redwood Coast Energy Authority (33B259CA01)	7/10/2020	Carbon Free Energy (Sale)		August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy
The Regents of the University of California (33B261CA01)	7/10/2020	Carbon Free Energy (Sale)		August-20 September-20 October-20 November-20 December-20		\$0	\$0	Q3 2020 Carbon Free Energy

Informational purposes only: In accordance with PG&E's CPUC approved BPP, below is a summary of QF contracts executed and/or amended during the Quarter filed via separate application, advice letter or other approval mechanisms:

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Orange Cove Irrigation Dist. (25H149QPA)	8/28/2020	PURPA	6 months	Contract	N/A	2020 ERRA Compliance Filing
Western Power and Steam II (25C138QPA)	9/4/2020	PURPA	3 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Frito Lay Cogen (25C063QPA2)	9/4/2020	PURPA	3 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing

¹ Monthly percentage of the Buyer's PCIA Load Share.

² Price nets to zero because eligible LSEs pay for these MWhs through PCIA and PG&E is retaining all CAISO revenues.

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Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q3 2020

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Chevron U.S.A. (Coalinga) (25C055)	9/4/2020	QF	3 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron U.S.A. (Cymric) (25C003)	9/4/2020	QF	3 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron U.S.A. (Taft/Cadet) (25C002)	9/4/2020	QF	3 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Western Power and Steam II (25C138QPA)	9/16/2020	PURPA	15 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron USA (Coalinga) (25C055)	9/18/2020	QF	12 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron USA (Cymric) (25C003)	9/18/2020	QF	12 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron U.S.A. (Taft/Cadet) (25C002)	9/18/2020	QF	12 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron U.S.A. (SE Kern River) (25C246)	9/22/2020	QF	12 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q3 2020

Informational purposes only: In accordance with PG&E's CPUC approved BPP, below is a summary of contracts executed and/or amended during the Quarter (non-QF) filed via separate application, advice letter or other approval mechanisms,

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Direct Energy Business, LLC (33B255)	7/1/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
BMW of North America, LLC (33R486)	7/6/2020	RPS Energy REC Sales	1 year	Contract	8/6/2020	Advice Letter 5906-E
Valley Clean Energy Alliance (33B254)	7/8/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
City Of King dba King City Community Power (33B257)	7/10/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
Tiger Natural Gas, Inc. (33B258)	7/10/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
Redwood Coast Energy Authority (33B259)	7/10/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
The Regents of the University of California (33B261)	7/10/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
San Diego Gas And Electric (33B256)	7/15/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
Wheelabrator Shasta Energy Company Inc.(33R406)	8/6/2020	BioRAM	N/A	Non-Routine Amendment to Existing Agreement	9/18/2020	Advice Letter AL-5955-E
SPI Biomass Portfolio (33R254)	8/20/2020	RPS	15 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRR Compliance Filing

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q3 2020

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Wheelabrator Shasta Energy Company Inc. (33R406)	8/24/2020	BioRAM	15 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRR Compliance Filing
Southern California Edison Company (33B217U01)	8/24/2020	RA	N/A	Non-Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing
WCW Generator 1 (33R487BIO)	8/26/2020	BioMAT	20 years	Contract	N/A	2020 ERRR Compliance Filing
Wheelabrator Shasta Energy Company Inc. (33R406)	9/4/2020	BioRAM	3 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRR Compliance Filing
SPI Biomass Portfolio (33R254)	9/4/2020	RPS	3 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRR Compliance Filing
Water Wheel Ranch (33R342RM)	9/8/2020	ReMAT	N/A	Consent to Assignment - General Consent	N/A	2020 ERRR Compliance Filing
Gateway Energy Storage, LLC (40S020)	9/11/2020	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing
Coso Battery Storage, LLC (40S018)	9/11/2020	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing
Diablo Energy Storage, LLC (40S015)	9/11/2020	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing
Diablo Energy Storage, LLC (40S016)	9/11/2020	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing
Diablo Energy Storage, LLC (40S017)	9/11/2020	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing
RDAF Energy Solutions, LLC (33B260)	9/16/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q3 2020

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Wheelabrator Shasta Energy Company Inc. (33R406)	9/17/2020	BioRAM	13 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Sierra Pacific Industries (33R254)	9/18/2020	RPS	12 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Geysers Power Company, LLC (33R093)	9/21/2020	RPS	N/A	Consent to Assignment - Financing	N/A	2020 ERRA Compliance Filing
Abel Road Bioenergy (33R479BIO)	9/24/2020	BioMAT	N/A	Consent to Assignment - Financing	N/A	2020 ERRA Compliance Filing
Solar Alpine LLC (33R078)	9/29/2020	RPS	NA	Consent to Assignment – Financing Amendment	N/A	2020 ERRA Compliance Filing
FFP CA Community Solar, LLC - Beard (33R488)	9/30/2020	CS-GT	NA	Contract	N/A	Advice Letter Pending
FFP CA Community Solar, LLC - Rocha (33R489)	9/30/2020	CS-GT	NA	Contract	N/A	Advice Letter Pending
FFP CA Community Solar, LLC - Gonzalez (33R490)	9/30/2020	DAC-GT	NA	Contract	N/A	Advice Letter Pending
FFP CA Community Solar, LLC - Highway 43 (33R491)	9/30/2020	DAC-GT	NA	Contract	N/A	Advice Letter Pending
FFP CA Community Solar, LLC - Kern Sunset (33R492)	9/30/2020	DAC-GT	NA	Contract	N/A	Advice Letter Pending

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q3 2020

Informational purposes only: In accordance with PG&E's CPUC approved BPP, below is a summary of the contracts terminated/expired during the Quarter:

Contract/ Counterparty Name	Termination or Expiration ¹	Date	Product	Volume (MW)
Henrietta D Energy Storage LLC (40S004)	Termination	7/29/2020	Energy Storage	10
Kings River Hydro Co. (25H150)	Expiration	8/18/2020	QF	1
Orange Cove Irrigation Dist.(25H149)	Expiration	8/22/2020	QF	0.45
EIF Haypress, LLC (15H005QPA)	Expiration	8/31/2020	PURPA	12.5
Eco Services Operations LLC (01C108)	Expiration	9/11/2020	QF	5

¹ A terminated contract is ended before its original expiration date. An expiration date is the natural end of the contract.

Attachment 5

Confidentiality Declarations and Matrix

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5986-E**

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN
CONFIDENTIAL ATTACHMENTS A, B, C, E, G, H, J, L, AND M**

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 October 30, 2020 Advice Letter 5986-E, Confidential Attachments A, B, C, E, G, H, J, L and M.
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 October 30, 2020, at San Francisco, California.

/s/
Marianne Aikawa

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5986-E**

**DECLARATION OF JAY BUKOWSKI
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S
CONFIDENTIAL ATTACHMENTS F AND K**

I, Jay Bukowski, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since October 1998. My current title is Manager within PG&E's Energy Policy and Procurement organization. In this position, my responsibilities include review of regulatory reports and managing PG&E's Procurement Review Group and Independent Evaluator program. 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 October 30, 2020 Advice Letter 5986-E, Confidential Attachments F and K.
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 October 30, 2020, at San Francisco, California.

/s/

Jay Bukowski

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 5986-E**

**DECLARATION OF JOHN ULLOA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND INFORMATION
CONTAINED IN CONFIDENTIAL ATTACHMENTS A, B, D, J AND L**

I, John Ulloa, declare:

1. I am presently employed by Pacific Gas and Electric Company (“PG&E”) and have been an employee since 1998. My current title is Manager, Electric Gas Supply in the Electric and Gas Acquisition Department, which is part of the Energy Policy and Procurement organization. I am responsible for physical and financial trading of gas in support of PG&E’s utility-owned generation plants and PG&E’s tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved. 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 October 30, 2020 Advice Letter 5986-E, Confidential Attachments A, B, D, J, and L.

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 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 October 30, 2020, at San Francisco, California.

John Ulloa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
OCTOBER 30, 2020**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	D.14-10-033, GHG Confidential Information Matrix (As corrected by D. 15-01-024)	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Confidential Attachment E, Q3 2020 GHG Materials folder: File name: 08_PGE PRG Pres GHG Position Update_091520.pdf, "Market Data Review, GHG Dispatch Curve", page 4 File name: 04_2020 Q3_Offset Procurement Strategy_Electric.docx	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite
Confidential Attachment F, Confid Atachment F Qtr03 2020 zip file: File name: PGE PRG Pres GHG Position Update_091520.pdf, "Market Data Review, GHG Dispatch Curve", page 4, email attachment Confidential Attachment F, Confid Atachment F Qtr03 2020 Mtgs, September 15 2020 folder: File name: PGE PRG Pres GHG Position Update_091520.pdf, "Market Data Review, GHG Dispatch Curve", page 4	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
OCTOBER 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment A – Physical and Financial Electric Transactions	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 years
Attachment A – Physical and Financial Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
OCTOBER 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (Electric and Natural Gas Transactions, Carbon Free Transactions)	Public Utilities Code Section 454.5(g)	The information contains confidential counterparty information. Release of this commercially market sensitive information could impact market prices because it would release financing terms to other market participants and impact future negotiations. This could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage by the disclosure of counterparty information. This information could be used by other market participants to gain a commercial advantage.	3 Years
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (GHG Transactions)	D.14-10-033 Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations. Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board ("CARB") auctions and PG&E's net open position for GHG compliance.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
OCTOBER 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment C – in its entirety: Electric Transactions	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
Attachment D – in its entirety: Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
OCTOBER 30, 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
Document: Quarterly Compliance Report			
Attachment E – in its entirety: Other Transactions (Electric Information) (Except Greenhouse Gas (“GHG”) Information, which is presented separately below)	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
Attachment E – in its entirety: Other Transactions- (GHG Information)	D.14-10-033 Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations. Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
OCTOBER 30, 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
Document: Quarterly Compliance Report			
Attachment F – in its entirety: PRG Material	D.06-06-066 and Public Utilities Code Section 454.5(g)	<p>Presentations to the PRG include a variety of confidential commercially market sensitive information, including information about e-solicitation, bilateral contracts, pricing information, strategy discussions, recently issued RFO's, etc.</p> <p>Release of this commercially market sensitive information could impact market prices, cause harm to PG&E's customers, and put PG&E at an unfair business disadvantage by the disclosing this information. This information could be used by other market participants to gain a commercial advantage.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Length of Time for Specific Items identified in D.06-06-066 Matrix or Indefinite (for GHG information)
Attachment F – in its entirety: PRG Material- GHG Information	D.14-10-033	<p>Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
OCTOBER 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment G - Independent Evaluator (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
Attachment H - Executed Contracts	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; Item VIII) A) Bid information and 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

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QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
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OCTOBER 30, 2020**

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Document: Quarterly Compliance Report			
Attachment H - Executed Contracts – GHG Information	D.14-10-033 Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations. Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board ("CARB") auctions and PG&E's net open position for GHG compliance.	Indefinite
Attachment J – System Conditions	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	Residual net short/long is key input to PG&E's confidential forecast of net open position. The residual net short/long is information provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Public Utilities Code Section 454.5(g)	In addition, this attachment contains market sensitive information and addresses PG&E's energy procurement trading strategies.	Indefinite
Attachment J - Gas Transaction Natural Gas Documents	Item I) A) 3) Gas Demand Forecasts and 4) Long-term fuel (gas) buying and hedging plans	This information includes detailed information on PG&E's implementation of its fuel buying and hedging plans and must remain confidential to avoid disclosing PG&E's market strategy.	Physical gas information is confidential for 3 Years; Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)

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Document: Quarterly Compliance Report			
Attachment K – Risk Management	Item XII – Monthly Portfolio Risk Assessment of Appendix 1 of D.06-06-066 for three years.	Value at Risk (VaR) or electric and gas for electric generation is deemed confidential the matrix. Public disclosure of TeVaR results would be detrimental for PG&E and its electric customers. Such disclosure would release confidential, sensitive market intelligence that would place PG&E at an unfair disadvantage in the energy and financial markets.	3 years
	Public Utilities Code 454.5(g)	Risk and Strategy papers are proprietary company information that if made public could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage.	Indefinite
Attachment L – In its entirety: Reasonable Number of Analyses	Item I) A) 4) Long-term fuel (gas) buying and hedging plans,	This information includes detailed information on PG&E's hedging plan, and must remain confidential to avoid disclosing PG&E's market strategy.	Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Public Utilities Code 454.5(g)	Information concerning a description of PG&E's long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage if publicly disclosed.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 5986-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2020
OCTOBER 30, 2020**

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Document: Quarterly Compliance Report			
Attachment L - Reasonable Number of Analyses – Electric	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve details which would reveal PG&E's position in the marketplace.	3 Years
	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	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
	VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation.	Monthly procurement costs (ERRA Filings) are confidential for 3 years
	Item XI) Monthly Procurement Costs (Energy Resource Recover Accounts [ERRA] Filings) D-14-10-033	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.	Indefinite
Attachment M – Executed Contracts	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	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	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.
	IGS Energy	Southern California Edison Company
California Hub for Energy Efficiency Financing	International Power Technology	Southern California Gas Company
	Intestate Gas Services, Inc.	Spark Energy
California Alternative Energy and Advanced Transportation Financing Authority	Kelly Group	Sun Light & Power
California Public Utilities Commission	Ken Bohn Consulting	Sunshine Design
Calpine	Keyes & Fox LLP	Tecogen, Inc.
	Leviton Manufacturing Co., Inc.	TerraVerde Renewable Partners
		Tiger Natural Gas, Inc.
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	TransCanada
Casner, Steve	MRW & Associates	Utility Cost Management
Cenergy Power	Manatt Phelps Phillips	Utility Power Solutions
Center for Biological Diversity	Marin Energy Authority	Water and Energy Consulting Wellhead Electric Company
	McKenzie & Associates	Western Manufactured Housing Communities Association (WMA)
Chevron Pipeline and Power		Yep Energy
City of Palo Alto	Modesto Irrigation District	
	NLine Energy, Inc.	
City of San Jose	NRG Solar	
Clean Power Research		
Coast Economic Consulting	Office of Ratepayer Advocates	
Commercial Energy	OnGrid Solar	
Crossborder Energy	Pacific Gas and Electric Company	
Crown Road Energy, LLC	Peninsula Clean Energy	
Davis Wright Tremaine LLP		
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		