

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 18, 2020

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Dear Mr. Jacobson,

On November 2, 2020, Pacific Gas and Electric Company (PG&E) filed a waiver request via Advice Letter 5989-E for its 2021 year-ahead local Resource Adequacy (RA) requirement in four of the disaggregated PG&E Other local areas. However, PG&E has also demonstrated that it met the local RA obligation in the aggregated PG&E Other local area. PG&E seeks relief from its remaining 2021 year-ahead local RA obligation and any potential Commission-imposed penalties for deficiencies. PG&E's waiver request demonstrated that it pursued all commercially reasonable efforts in procuring local capacity to meet its local RA obligations in the six disaggregated local areas. The Energy Division of the California Public Utilities Commission (Commission) approves Advice Letter 5989-E, PG&E's request for a penalty waiver.

Commission Decision (D.) 06-06-064 established waiver provisions for local Resource Adequacy (RA) procurement. D.20-06-031 established criteria for fulfilling local RA obligations in the six disaggregated PG&E Other local areas. D.20-06-031 also established 2021 compliance year obligations for all Load Serving Entities (LSEs). On November 2, 2020, PG&E submitted its year-ahead local RA compliance filing, showing a deficiency in four of the disaggregated PG&E Other local areas, but also showing that it has met the local RA obligation in the aggregated PG&E Other local area. PG&E submitted a request for penalty waiver for this deficiency via Advice Letter 5989-E pursuant to D.06-06-064 and D.20-06-031.

Section 3.8 of D.20-06-031 establishes criteria for fulfilling local RA obligations in the six disaggregated local areas:

Accordingly, an LSE shall have fulfilled their RA obligations in the six disaggregated LCAs if the following requirements are met:

- (1) The LSE makes the required demonstration as part of the current local waiver process through the Tier 2 Advice Letter for its disaggregated PG&E Other local capacity requirements; and*
- (2) The LSE, in its Year Ahead compliance filing, demonstrates procurement of local RA capacity within the PG&E Other LCAs such that the LSE's collective*

procurement in the six disaggregated PG&E Other LCAs meets the LSE's collective requirement for the disaggregated PG&E Other LCAs.

The process and standard for applying for the PG&E Other waiver will otherwise be the same process and standard for all local waiver requests. An LSE may still seek a waiver of one or more of the disaggregated PG&E Other obligations, even if it has not met the aggregation obligation despite commercially reasonable efforts.

Section 3.3.12 of D.06-06-064 describes a standard that an LSE may use to demonstrate that it could not reasonably achieve its LCR obligations:

(1) a demonstration that the LSE reasonably and in good faith solicited bids for its RAR capacity needs along with accompanying information about the terms and conditions of the Request for Offer or other form of solicitation, and

(2) a demonstration that despite having actively pursued all commercially reasonable efforts to acquire the resources needed to meet the LSE's local procurement obligation, it either

(a) received no bids, or

(b) received no bids for an unbundled RA capacity contract of under \$40 per kW-year or for a bundled capacity and energy product of under \$73 per kW-year, or

(c) received bids below these thresholds but such bids included what the LSE believes are unreasonable terms and/or conditions, in which case the waiver request must demonstrate why such terms and/or conditions are unreasonable.

An LSE's waiver request that meets these requirements is a necessary but not a sufficient condition for the grant of such waiver. The Commission will also consider other information brought to its attention regarding the reasonableness of the waiver request.

Energy Division has reviewed PG&E's 2021 year-ahead compliance filing and determines that PG&E has met its local RA obligation in the aggregated PG&E Other local area. Energy Division also reviewed PG&E's actions to procure local RA resources to meet the local RA requirements of the six disaggregated local areas, and finds them reasonable considering the capacity available to meet PG&E's local RA obligation. In this case, Energy Division finds that PG&E held solicitations and pursued all commercially reasonable efforts to acquire the resources needed to meet the LSE's local procurement obligation. PG&E's waiver request includes confidential market-sensitive information supporting this finding. Thus, Energy Division grants Advice Letter 5989-E, PG&E's request for a waiver of Commission penalties related to its 2021 year-ahead local RA procurement for 2021 to 2023.

Advice Letter 5989-E is effective on December 18, 2020.

Sincerely,

Handwritten signature of Edward Randolph in black ink, followed by the text "(f01)" in parentheses.

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

Cc: EDComplianceReports@cpuc.ca.gov



Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

November 2, 2020

Advice 5989-E

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

Subject: Required Demonstration for PG&E’s Disaggregated PG&E Other Local Capacity Area Requirements in Compliance with Ordering Paragraph 22(a) of Decision 20-06-031

I. Purpose

Pursuant to Decisions 06-06-064, 19-06-026, and 20-06-031, Pacific Gas and Electric Company (PG&E) hereby submits this Advice Letter in furtherance of fulfillment of its local resource adequacy (RA) procurement obligations in the six disaggregated “Pacific Gas and Electric Company Other” (PG&E Other) local capacity areas (LCA).¹ In accordance with Ordering Paragraph 22(a) of Decision 20-06-031 and Decision 06-06-064, PG&E is submitting this Advice Letter to make the required demonstration for its disaggregated PG&E Other local capacity requirements at the same time it is submitting its 2021 Annual Compliance Filing. As required under Ordering Paragraph 22(b) of Decision 20-06-031, PG&E’s 2021 Annual Compliance Filing demonstrates procurement by PG&E of local RA capacity within the PG&E Other LCAs such that PG&E’s collective procurement in the six disaggregated PG&E Other LCAs meets PG&E’s collective requirement for the

¹ This Advice Letter is not styled as a request for waiver of penalties for failure to meet local RA procurement obligations in the PG&E Other LCA because PG&E has fulfilled its local RA procurement obligations in the six disaggregated PG&E Other LCAs pursuant to Ordering Paragraph 22 of Decision 20-06-031. Thus, no penalties are warranted. Notwithstanding the foregoing, the demonstration contained in Section IV of this Advice Letter meets all requirements for a successful waiver of penalties request set forth in Decision 06-06-064, as modified by Decision 19-06-026. Thus, to the extent that Energy Division determines that PG&E has not met the requirements of Ordering Paragraph 22 of Decision 20-06-031 for any reason, PG&E requests that Energy Division treat this Tier 2 Advice Letter as a request for waiver of penalties for failure to meet local RA procurement obligations in the PG&E Other LCA. Unless and until this Tier 2 Advice Letter becomes effective, PG&E will continue to submit Tier 2 Advice Letters with each monthly compliance filing to make the required demonstration under Ordering Paragraph 22(a) of Decision 20-06-031 for its disaggregated PG&E Other local capacity requirements. PG&E reserves its rights to appeal any determination by Energy Division of failure to comply with Ordering Paragraph 22 of Decision 20-06-031 through the appropriate procedural vehicle(s).

disaggregated PG&E Other LCAs. Thus, pursuant to Decision 20-06-031, PG&E has fulfilled its RA obligations in the six disaggregated PG&E Other LCAs.

II. Background

In Decision 06-06-064, the California Public Utilities Commission (CPUC or Commission) aggregated six LCAs within the PG&E territory to address market power in constrained local areas. These six LCAs are Humboldt, North Coast/North Bay, Sierra, Stockton, Greater Fresno, and Kern.² Subsequently, in Decision 19-02-022, the Commission disaggregated the PG&E Other local area, as “a necessary first step towards addressing inefficient procurement that may lead to backstop procurement.”³ Following this disaggregation in 2019, the Commission’s Energy Division reported a significant increase in local penalty waiver requests for the 2020 year-ahead RA compliance filing and noted that municipal utilities, which are non-CPUC-jurisdictional load serving entities (LSE), “own 20 percent of capacity in Stockton and 54 percent of capacity in Sierra but... there is no incentive to sell their capacity in the PG&E Other LCAs.”⁴

Recognizing the challenges LSEs face in meeting local requirements for the six PG&E Other LCAs,⁵ the Commission ordered in Ordering Paragraph 22 of Decision 20-06-031 that a LSE shall have fulfilled its RA obligations in the six disaggregated PG&E Other LCAs if the following requirements are met:

- (a) The LSE makes the required demonstration as part of the current local waiver process through a Tier 2 Advice Letter for its disaggregated PG&E Other local capacity requirements; and
- (b) The LSE, in its Year Ahead compliance filing, demonstrates procurement of local RA capacity within the PG&E Other LCAs such that the LSE’s collective procurement in the six disaggregated PG&E Other LCAs meets the LSE’s collective requirement for the disaggregated PG&E Other LCAs.⁶

Ordering Paragraph 22(a) of Decision 20-06-031 refers to “the current local waiver process,” which is a process that originated in Decision 06-06-064 and Decision 07-06-029. In Decision 06-06-064 and Decision 07-06-029, the Commission first established local RA procurement obligations and a penalty structure applicable when a LSE fails to demonstrate in its required compliance filing that it has met its allocated local RA procurement obligations.⁷ Anticipating that, despite commercially reasonable efforts,

² Decision 06-06-064, p. 37.

³ Decision 19-02-022, pp. 30-31.

⁴ Decision 20-06-031, pp. 67-68.

⁵ Decision 20-06-031, p. 70.

⁶ Decision 20-06-031, Ordering Paragraph 22.

⁷ Decision 06-06-064, pp. 66-69, Conclusions of Law 24-26, Ordering Paragraph 1; Decision 07-06-029, pp. 37-38.

some LSEs may ultimately be unable to procure capacity necessary to meet local obligations due to limited availability in local areas, the Commission also adopted a waiver-of-penalties process. An LSE is able to request, at the time it files its local RA compliance showing, a waiver of penalties associated with its failure to demonstrate that it has met its local RA procurement obligation, if it makes the specified demonstration set forth below in Section III regarding its efforts to acquire needed resources.⁸ In Decision 19-02-022, the Commission extended this waiver of penalties process to multiyear local RA procurement obligations.⁹

Below in Section III, PG&E sets forth the “required demonstration as part of the current local waiver process” as referenced in Ordering Paragraph 22(a) of Decision 20-06-031.

III. Required Demonstration in this Tier 2 Advice Letter Pursuant to Ordering Paragraph 22(a) of Decision 20-06-031

Decision 06-06-064 sets forth the required contents of a waiver request that are referenced in Ordering Paragraph 22(a) of Decision 20-06-031,¹⁰ and Decision 19-06-026 provides an update to such required contents.¹¹ Section 24 of the Commission’s *2021 Filing Guide for System, Local and Flexible Resource Adequacy (RA) Compliance Filings*, issued October 2, 2020, includes these updated requirements, as follows:

The waiver process is as follows. An LSE requesting a waiver must make such request at the time it files its Local RAR compliance showing. The waiver request must include both of the following:

(1) a demonstration that the LSE reasonably and in good faith solicited bids for its RAR capacity needs along with accompanying information about the terms and conditions of the Request for Offer or other form of solicitation, and

(2) a demonstration that despite having actively pursued all commercially reasonable efforts to acquire the resources needed to meet the LSE’s local procurement obligation, it either

(a) received no bids, or

(b) received no bids for an unbundled RA capacity contract of under \$51 per kW-year or for a bundled

⁸ Decision 06-06-064, pp. 71-74, Conclusions of Law 27-28, Ordering Paragraph 1.

⁹ Decision 19-02-022, p. 29, Ordering Paragraph 13.

¹⁰ Decision 06-06-064, pp. 72-73.

¹¹ Decision 19-06-026, Ordering Paragraph 6.

capacity and energy product of under \$73 per kW-year, or

(c) received bids below these thresholds but such bids included what the LSE believes are unreasonable terms and/or conditions, in which case the waiver request must demonstrate why such terms and/or conditions are unreasonable.

IV. PG&E's Demonstration for PG&E's Disaggregated PG&E Other Local Capacity Requirements

PG&E is submitting a 2021 Annual Compliance Filing that demonstrates that PG&E has fulfilled its RA obligations in the six disaggregated PG&E Other LCAs by meeting the requirements set forth in Ordering Paragraph 22 of Decision 20-06-031 and described above in Section II, for the 2021-2022 period. By this Tier 2 Advice Letter, PG&E makes the required demonstration described above in Section III for its disaggregated PG&E Other local capacity requirements. Separately, as required under Ordering Paragraph 22(b) of Decision 20-06-031, PG&E's 2021 Annual Compliance Filing demonstrates procurement by PG&E of local RA capacity within the PG&E Other LCAs such that PG&E's collective procurement in the six disaggregated PG&E Other LCAs meets PG&E's collective requirement for the disaggregated PG&E Other LCAs. Thus, pursuant to Decision 20-06-031, PG&E has fulfilled its RA obligations in the six disaggregated PG&E Other LCAs.

As described below, PG&E reasonably and in good faith issued several electronic solicitations and made all commercially reasonable efforts to meet its disaggregated local RA procurement obligations, but it was unable to close its short positions. Thus, PG&E has chosen to comply with the CPUC's Local RA procurement obligations for the PG&E Other LCAs through the alternative compliance mechanism.

A. PG&E reasonably and in good faith solicited bids for PG&E's local RA capacity needs

Below, PG&E provides a demonstration that it reasonably and in good faith solicited bids for its local RA capacity needs in each of the six disaggregated PG&E Other LCAs along with accompanying information about the terms and conditions of PG&E's electronic solicitations.

PG&E Solicitations for Capacity to Meet Local RA Procurement Obligations

PG&E undertook several electronic solicitations to fulfill its disaggregated local procurement obligations for the 2021-2022 compliance years. Specifically, the first was a Q3 Balance of Year and 2021-2023 Local RA Procurement Resource Adequacy Electronic Solicitation which sought to procure volumes in the Greater Bay Area, North

Coast/North Bay, Sierra, Kern and Stockton LCAs. This solicitation was announced on April 6, 2020.

Subsequent solicitations also requested multi-year offers for PG&E to purchase the capacity needed in the Greater Bay Area LCA and the disaggregated PG&E Other LCAs. These included the Q4 Balance of Year and 2021-2022 Local RA Procurement Resource Adequacy Electronic Solicitation (launched July 9, 2020), as well a final solicitation with two phases. A Multi-Year Resource Adequacy Electronic Solicitation – Phase 1 was launched on August 11, 2020 for purchases and sales of Local, System, and Flexible RA, and Import Allocation Rights for the years 2021 through 2022. On September 18, 2020, PG&E started Phase 2 of the 2020 Multi-Year RA Electronic Solicitation for the same products. The documents associated with these solicitations can be found in Appendix A.

See the table below for a visual representation of these PG&E Electronic Solicitations.

Title of Solicitation	Date Launched	Term	Products Sought
Q3 Balance of Year + 2021-2023 Local RA Procurement Resource Adequacy Electronic Solicitation	April 6, 2020	July – December 2020	Buy and Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2021-2023	Buy Local RA (Greater Bay Area LCA, and well as the other LCAs)
Q4 Balance of Year + 2021-2022 Local RA Procurement Resource Adequacy Electronic Solicitation	July 9, 2020	October – December 2020	Buy and sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2021-2022	Buy Local RA (all LCAs)
Multi-Year Resource Adequacy Electronic Solicitation – Phase 1	August 11, 2020	2021	Buy and Sell System, Local and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2022	Buy and Sell Local RA (all LCAs)
Multi-Year Resource Adequacy Electronic Solicitation – Phase 2	September 18, 2020	2021	Buy and Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2022	Buy and Sell Local RA (all LCAs)

B. Despite having actively pursued all commercially reasonable efforts to acquire needed resources in the PG&E Other LCAs, PG&E either received no bids, received no bids under the specified thresholds, or received bids below these thresholds but such bids included what PG&E believes are unreasonable terms and/or conditions

Below, PG&E provides a demonstration that, despite having actively pursued all commercially reasonable efforts to acquire the resources needed to meet its local procurement obligations in the six disaggregated PG&E Other LCAs, PG&E either: (a) received no bids, (b) received no bids for an unbundled RA capacity contract of under \$51 per kW-year or for a bundled capacity and energy product of under \$73 per kW-year, or (c) received bids below these thresholds but such bids included what PG&E believes are unreasonable terms and/or conditions, in which case the waiver request must demonstrate why such terms and/or conditions are unreasonable.

Results

PG&E was able to procure capacity in each of the six disaggregated PG&E Other LCAs. However, despite commercially reasonable efforts, PG&E was unable to procure to its full local RA obligations for the North Coast North Bay, Kern, Sierra, and Stockton LCAs.

In each of these local areas, there were (a) suppliers who had no capacity to sell and therefore PG&E received no bids from those suppliers, (b) suppliers that submitted bids to PG&E with prices that exceeded the applicable \$51 per kW-year or \$73 per kW-year thresholds, or (c) suppliers that submitted bids to PG&E with prices below the applicable thresholds, but such bids included what PG&E believes are unreasonable terms and/or conditions. Detailed descriptions of PG&E's efforts to procure in each of these areas, including descriptions of bids received and a demonstration of why the terms and/or conditions included in bids with prices below the applicable thresholds were unreasonable, can be found in Appendix B.

C. Other information

PG&E notes that, in some local areas, the generating capacity available is close to the total level of the requirements in local areas. The table below shows the quantity of capacity on the 2021 net qualifying capacity (NQC) list as well as the 2021 local requirements for the Kern, Sierra, and Stockton areas.

Local Area	Sum of August NQC ¹² (MW)	2021 Local Requirement ¹³ (MW)	Excess Supply (MW)
Kern	393.17	413	0
North Coast North Bay	832.15	842	0
Sierra	1876.82	1821	55.82
Stockton	607.62	596	11.62

While demand response resources are also available to meet local requirements, the table illustrates how little excess generating capacity exists in these regions.

PG&E also notes that the 2021 local requirements were established using the NQC list from 2020. To the extent there are changes (e.g. due to updated Hydro NQC methodology changes) in the capacity represented on the NQC list between years, this may also have an impact on the ability to meet local requirements.

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

V. Confidentiality Treatment

In support of this Advice Letter, PG&E has provided the confidential information in Appendix B. This information is being submitted in the manner directed by Decision 08-04-023, the August 22, 2006 Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066, General Order 66-D, and the "Second Revised Protective Order Regarding Confidentiality of Market Sensitive Load and Resource Data and Information" (SRPO) that ALJ Wetzell issued in his March 1, 2007 ruling to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under the SRPO and applicable law, including California Public Utilities Code Section 454.5(g), or the Investor Owned Utility Matrix, Appendix 1 of Decision 06-06-066 and Appendix C of Decision 08-04-023. Separate Declarations Seeking Confidential Treatment are being submitted concurrently with this Advice Letter.

VI. 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*****

¹² Summed by local area, per 2021 NQC list issued by CPUC on October 20, 2020. File can be found at <https://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442466541>.

¹³ Decision 20-06-031, p. 17.

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail 20 days after the date of this submittal. Per Rule 1.15 of the Rules of Practice and Procedure of the CPUC, for filing days that fall on a Saturday, Sunday, holiday, or other days when the Commission offices are closed, the time limit is extended to include the first day thereafter. As such, protests to this submittal are due no later than November 23, 2020. 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).

VII. Effective Date

PG&E requests that this Tier 2 advice letter become effective on regular notice, December 2, 2020 which is 30 calendar days after the date of submittal.

VIII. Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.19-11-009. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments:

Appendix A: Market Notice of PG&E's Electronic Solicitations

Appendix B: PG&E's Procurement Efforts in North Coast North Bay, Kern, Sierra, and Stockton LCAs (Redacted)

cc: Service List R.19-11-009



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: Stuart Rubio

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 5989-E

Tier Designation: 2

Subject of AL: Required Demonstration for PG&E's Disaggregated PG&E Other Local Capacity Area Requirements in Compliance with Ordering Paragraph 22(a) of Decision 20-06-031

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.06-06-064, 19-06-026, 20-06-031

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information: Confidentiality deceleration and matrix
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Scott Ranzal, 415-264-3638, SDRi@pge.com.

Resolution required? Yes No

Requested effective date: 12/2/20

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:

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Scott Ranzal, am the Director of Portfolio Management of Pacific Gas and Electric Company (“PG&E”), a California corporation. Fong Wan, the Senior Vice President for Energy Policy and Procurement of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
77 Beale Street, Mail Code 25A
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.
3. Title and description of document(s): Filing_Evidence_CONF.pdf (Confidential Attachments 1-20 of Appendix B to Advice Letter 5989-E: PG&E Procurement Efforts in North Coast North Bay, Kern, Sierra, and Stockton LCAs)
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check

Basis for Confidential Treatment

Where Confidential Information is located on the documents

Customer-specific data, which may include demand, loads, names, addresses, and billing data
(Protected under PUC § 8380; Civ. Code §§ 1798 *et seq.*; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)

Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual
(Protected under Civ. Code §§ 1798 *et seq.*; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)

Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113
(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)

Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data
(Protected under Civ. Code §§3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)

Corporate financial records
(Protected under Govt. Code §§ 6254(k), 6254.15)

Attachments 1-20 of

Appendix B



Third-Party information subject to non-disclosure or confidentiality agreements or obligations
 (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)

Attachments 1-20 of
 Appendix B



Other categories where disclosure would be against the public interest (Govt. Code § 6255(a))

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 2nd day of November, 2020 at San Francisco, California.



 Scott Ranzal
 Director, Portfolio Management
 Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

ADVICE LETTER 5989-E
ATTACHMENT TO DECLARATION

November 2, 2020

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
Filing_Evidence_CONF.pdf	Filing_Evidence_CONF	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	Grey shading in Appendix B, Attachments 1-20
Filing_Evidence_CONF.pdf	Filing_Evidence_CONF	<p>Third-Party information subject to non-disclosure or confidentiality agreements or obligations</p> <p>(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)</p>	Grey shading in Appendix B, Attachments 1-20

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

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF SCOTT RANZAL
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION CONTAINED
IN ADVICE LETTER 5989-E**

I, Scott Ranzal, declare:

1. I am the Director of Portfolio Management within Energy Policy and Procurement at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include oversight of commercial activities and interactions with market participants related to Resource Adequacy. 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 the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information provided to the Commission's Energy Division on November 2, 2020.

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 and Public Utilities Code §454.5(g). The attached 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 that is pertinent to my declaration in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on November 2, 2020 at San Francisco, California.

A handwritten signature in black ink, appearing to read "S. Ranzal". The signature is written in a cursive, flowing style.

Scott Ranzal
Director, Portfolio Management
Pacific Gas and Electric Company

ATTACHMENT 1

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

**Advice 5989-E
November 2, 2020**

IDENTIFICATION OF PROCUREMENT-RELATED CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Statute or Order That Data Corresponds To	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
Document:			
Filing_Evidence_CONF.pdf	Section VIII) A) – Bid Information	<p>Confidential bid information from solicitation e.g., participating bids, counterparty names, prices and quantities offered.</p> <p>Information includes PG&E’s confidential sales and procurement needs for Resource Adequacy (RA) products which directly informs PG&E’s RA strategies to buy and sell in the market. Any disclosure of PG&E’s sales and procurement strategies is market sensitive, and if released, this information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage.</p>	Three years
Filing_Evidence_CONF.pdf	Public Utilities Code §454.5(g)	<p>Confidential bid information from solicitation e.g., participating bids, counterparty names, prices and quantities offered.</p> <p>Information includes PG&E’s confidential sales and procurement needs for Resource Adequacy (RA) products which directly informs PG&E’s RA strategies to buy and sell in the market. Any disclosure of PG&E’s sales and procurement strategies is market sensitive, and if released, this information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage.</p>	Three years

PACIFIC GAS AND ELECTRIC COMPANY

Appendix A

Market Notice of PG&E's Electronic Solicitations

RA Solicitations

To: Wecker, Alan
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 1

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Tuesday, August 11, 2020 5:41 PM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: Charles Janecek <Charles.Janecek@PACONSULTING.COM>
Subject: PG&E 2020 Multi-Year RA Solicitation - Phase 1

To Prospective Participant:

Pacific Gas and Electric Company ("PG&E") invites your participation in its Resource Adequacy ("RA") and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
1	System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021 – Dec 2021	Fixed Price \$/kW-month
2	Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021-Dec 2022	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Jan-Dec 2021	Fixed Price \$/kW-month
4	Import Energy *	Buy	5 MW	Jan-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

**PG&E's preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

All responses are due **Tuesday, August 18 by 5:00pm Pacific Prevailing Time ("PPT")** at the latest. However, PG&E encourages all participants to submit offers and bids in advance of this deadline.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement ("Confirmation").

PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Tuesday 8/11
Offers and Bids due	Tuesday 8/18 5pm PPT
PG&E consults with its PRG regarding its proposed shortlist.	Thursday 8/27
PG&E notifies participants of shortlist status *	Monday 8/31
Deadline for notified shortlisted participants to accept shortlist status and final volumes	Tuesday 9/1 5pm PPT
Deadline for return of partially executed confirmation(s)	Thursday 9/10 EOD
Target full execution of confirmations	Friday 9/11 EOD

** PG&E may delay the shortlisting date as well as all subsequent dates based on the availability of initial Net Qualifying Capacity values.*

4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com.

5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

RA Solicitations

To: Wecker, Alan
Subject: RE: PG&E PRG Information | PG&E 2020 Multi-Year RA Solicitation - Phase 2

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Friday, September 18, 2020 4:46 PM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: Charles Janecek <Charles.Janecek@PACONSULTING.COM>
Subject: PG&E 2020 Multi-Year RA Solicitation - Phase 2

To Prospective Participant:

Pacific Gas and Electric Company ("PG&E") invites your participation in its Resource Adequacy ("RA") and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
1	System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021 – Dec 2021	Fixed Price \$/kW-month
2	Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021-Dec 2022	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Jan-Dec 2021	Fixed Price \$/kW-month
4	Import Energy *	Buy	5 MW	Jan-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

**PG&E's preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

The deadline to submit a response is 5:00 pm (PPT), 2 business days after the final NQC list is published by the CAISO. PG&E reserves the right to distribute an updated solicitation timeline to participants when more information is available.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement ("Confirmation").

PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

Please note a few PG&E changes to the Offer and Bid Form functionality. For RA, the allowable count per mutually exclusive group increases from 3 to 6, and the maximum number of groups allowed increases to 10. PG&E has also added the ability to use mutually exclusive groups for import allocation rights.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Friday 9/18
Offers and Bids due	5 pm (PPT), 2 Business Days after Final NQC list publication
PG&E consults with its PRG regarding its proposed shortlist.	+ 4 Business Days
PG&E notifies participants of shortlist status	+ 2 Business Days
Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	+ 2 Business Days

4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com, with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM).

5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

Wecker, Alan

Subject: RE: PG&E PRG Information | PG&E 2020 Balance of Year RA and Import Energy, and 2021-2023 RA E-Solicitation

From: RA_Solicitations <RASolicitations@pge.com>

Sent: Monday, April 06, 2020 4:26 PM

To: RA_Solicitations <RASolicitations@pge.com>

Cc: Charles.Janecek@PACONSULTING.COM

Subject: PG&E 2020 Balance of Year RA and Import Energy, and 2021-2023 RA E-Solicitation

To Prospective Participant:

Pacific Gas and Electric Company ("PG&E") invites your participation in its Resource Adequacy ("RA") and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
1	Local/System RA ^{a, b}	Buy, Sell, Simultaneous Buy/Sell	1 MW	July-Dec 2020	Fixed Price \$/kW-month
2	Local RA	Buy	1 MW	Jan 2021-Dec 2023	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	July-Dec 2020	Fixed Price \$/kW-month
4	Import Energy ^c	Buy	25 MW	Aug-Oct 2020	CAISO LMP, ICE Index, or Fixed Price \$/MWh

Notes:

- PG&E is only accepting same-month offers for sale / bids to purchase (*i.e.*, **simultaneous PG&E buys/PG&E sells**).
- With respect to local for 2020, PG&E is specifically interested in procuring capacity in the Kern local capacity area.
- PG&E prefers to transact Import Energy with prices indexed to CAISO LMP. PG&E will also consider offers with prices indexed to ICE or with fixed prices.

All responses are due **Wednesday, April 15 by 5:00pm Pacific Prevailing Time ("PPT")** at the latest. However, PG&E encourages all participants to submit offers and bids in advance of this deadline.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s accompanying Confirmations set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

The Parties agree that the following provisions of the Master Agreement shall not be applicable to this Confirmation or Transactions hereunder: Section 22.1(c), Section 27, and the final paragraph of Section 37 (or, if transacting under the EEI Agreement, Sections 5.1(d), 5.1(e), 5.1(f), 10.2(v), 10.2(vi), 10.2(x), and 10.10). Notwithstanding anything to the contrary contained herein, with respect to Buyer: Seller acknowledges and agrees that the existence or continuation of Buyer’s Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court for the Northern District of California (Case Nos. 19-30088 (DM) and 19-30089 (DM)) is not an Event of Default with respect to Buyer under the Master Agreement and does not entitle Seller to terminate the Master Agreement or this Confirmation solely because of such existence or continuation.

2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Monday 4/6
Offers and Bids due	Wednesday 4/15 5pm PPT
PG&E notifies participants of shortlist status	Friday 4/24
Deadline for notified shortlisted participants to accept shortlist status and final volumes	Monday 4/27 12 pm PPT
Deadline for return of partially executed confirmation(s)	Tuesday 4/28 EOD
Target full execution of confirmations	Friday 5/1 EOD

4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com.

5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

RA Solicitations

To: Wecker, Alan
Subject: RE: PG&E 2020 Balance of Year RA and Import Energy, and 2021-2022 RA E-Solicitation

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Thursday, July 09, 2020 4:30 PM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: charles.janacek@pacconsulting.com
Subject: PG&E 2020 Balance of Year RA and Import Energy, and 2021-2022 RA E-Solicitation

To Prospective Participant:

Pacific Gas and Electric Company ("PG&E") invites your participation in its Resource Adequacy ("RA") and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
1	Local/System RA ^a	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 ^b	Buy	25 MW	Oct-Dec 2020	CAISO LMP, ICE Index, or Fixed Price \$/MWh

Notes:

- PG&E is interested in simultaneous purchase/sale transactions in the same delivery month. (*i.e.*, **simultaneous PG&E buys/PG&E sells**).
- PG&E's preference is to transact Import Energy indexed to CAISO LMP, but will consider offers for ICE Indexed or Fixed Prices transactions too.

All responses are due **Wednesday, July 15 by 5:00pm Pacific Prevailing Time ("PPT")** at the latest. However, PG&E encourages all participants to submit offers and bids in advance of this deadline.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s will provide RA and IAR Confirmations at a later date that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Thursday 7/9
Offers and Bids due	Wednesday 7/15 5pm PPT
PG&E notifies participants of shortlist status	Wednesday 7/22
Deadline for notified shortlisted participants to accept shortlist status and final volumes	Thursday 7/23 5pm PPT
Deadline for return of partially executed confirmation(s)	Wednesday 7/29 EOD
Target full execution of confirmations	Friday 7/31 EOD

4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com.

5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

PACIFIC GAS AND ELECTRIC COMPANY

Appendix B

**PG&E's Procurement Efforts in North Coast
North Bay, Kern, Sierra, and Stockton LCAs**

(Redacted)

Appendix B: PG&E Procurement Efforts in North Coast North Bay, Kern, Sierra, and Stockton LCAs

PG&E has determined that it will be unable to meet its annual CPUC Local Resource Adequacy (RA) compliance requirements in the individual four local areas: North Coast North Bay, Kern, Stockton and Sierra. The following is a summary of all activities PG&E has taken to-date to close its CPUC compliance position.

Background on Commercial Activities

On April 6, when launching its Q3 Balance of Year and 2021-2023 Local RA Procurement RA Electronic Solicitation, PG&E included a statement indicating that the Utility was interested in RA Capacity from PG&E Local Areas in 2021-2023. While PG&E received some Local RA offers, it only transacted with one counterparty for a small amount (less than 10 megawatts (MW)) of Sierra RA Capacity for 4 months in 2021.

On July 9, when launching its Q4 Balance of Year and 2021-2022 Local RA Procurement RA Electronic Solicitation, PG&E included a statement indicating that the Utility was interested in RA Capacity from PG&E Local Areas in 2021-2022. While PG&E received some Local RA offers, none of the offers were for time periods and locations where PG&E had a Local RA need at the time of the evaluation of bids and offers.

On August 11, when launching Phase 1 of its Multi-Year RA Electronic Solicitation, PG&E included a statement indicating that the Utility had a need in five local capacity areas (LCAs): Greater Bay Area, Kern, Stockton, Sierra and North Coast North Bay. Following bid submissions from Phase 1 of the solicitation, PG&E determined that there was still a need in these five local areas, PG&E reviewed the broker market to determine if there was available capacity in these five local areas; however, it was apparent through a review of the broker market that there was either limited capacity or prices were well above \$51 per kW-year. Given this, PG&E decided to complete additional research to determine who might have capacity to close its short positions as described in the subsequent paragraph.

PG&E assessed all resources that have capacity in the LCAs where PG&E had a need. Similar to PG&E's 2019 waiver filing,¹ PG&E reviewed numerous sources to understand existing contractual relationships between generators and municipal utilities and/or other LSEs with respect to resources in these LCAs. Comparing this information to the information PG&E currently has about its own portfolio, as well as the total physical capacity in the LCAs, PG&E was able to ascertain which counterparties were likely to have capacity available to sell. PG&E used this information to contact those potential suppliers and request that they participate in Phase 2 of PG&E's Multi-Year RA Solicitation.

Below, PG&E summarizes communications and attaches supporting documentation, organized first as it applies to all four areas where PG&E remains short, and then by each LCA. For each section, evidence is organized into three categories, where PG&E received:

- No bids;

¹ AL 5677-E

- No bids for an unbundled RA capacity contract of under \$51 per kW-year (CPUC’s Local RA waiver trigger price) or for a bundled capacity and energy product of under \$73 per kW-year; and
- Bids below the thresholds, but such bids included what PG&E believes are unreasonable terms and/or conditions, in which case PG&E demonstrates below why such terms and/or conditions are unreasonable.

In addition to these three categories, PG&E also compared prices against the CAISO Capacity Procurement Mechanism (CPM) soft-offer cap of \$75.72 per kW-year or \$6.31/kW-mo.

For All Four Disaggregated PG&E Other Local Areas where PG&E Remains Short

1. PG&E contacted nine non-Commission-jurisdictional municipal utilities that own or contract with capacity in the North Coast North Bay, Kern, Sierra and Stockton LCAs to inquire about purchasing local capacity in these areas.

- No bids
 - i. Three of these entities have been unresponsive to PG&E’s outreach to date.
 - ii. Three municipal utilities held solicitations in which the entities were selling North Coast North Bay, Sierra, and/or Stockton. PG&E submitted bids into but did not receive any awards from all three of the Market Request for Proposals. See Attachments 1-3 for evidence of communications with the counterparties mentioned above.
 - iii. Two municipal utilities communicated that they did not have any available capacity. See Attachments 4-5 for evidence of communications with the counterparties mentioned above
 - iv. One municipal utility participated in PG&E’s Multi-Year RA Solicitation and offered Sierra RA Capacity as part of a set of simultaneous purchase and sell transactions but was unable to accept PG&E’s award due to timing and other concerns. See Attachment 6 for evidence of this rejection.

2. PG&E collected evidence related to communications with CPUC-jurisdictional counterparties who own or have contracted with resources in the four identified LCAs who did not offer into any of PG&E’s RA solicitations as well as entities who bid into PG&E’s Multi-Year RA Solicitation.

- PG&E asked each entity that participated in both phases of PG&E’s Multi-Year RA Solicitation if they had any MWs during the time periods where PG&E had not yet acquired the sufficient resources to meet its Local RA compliance requirements.
- No bids
 - i. Seven potential counterparties all indicated that they did not have available MWs to help resolve PG&E’s need. Please see Attachments 7-13 for examples of communications with the counterparties mentioned above.

- No bids for an unbundled RA capacity contract of under \$51 per kW-year (CPUC’s Local RA waiver trigger price) or for a bundled capacity and energy product of under \$73 per kW-year
 - i. Other than the non-Commission-jurisdictional municipal utilities, 10 of 18 other potential counterparties indicated that they may have capacity to sell. PG&E entered into transactions with three of these counterparties. Two of the remaining six counterparties offered to sell Local RA capacity to PG&E at prices well above the CPUC’s Local RA waiver trigger. Please see Attachments 14-15 for evidence of communications with these counterparties.

- Bids below the thresholds, but such bids included what PG&E believes are unreasonable terms and/or conditions, in which case PG&E demonstrates below why such terms and/or conditions are unreasonable.
 - i. Four potential counterparties all indicated that they did have available MWs to help resolve PG&E’s need. However, each counterparty indicated that it was only willing to sell the available capacity if PG&E would make capacity available in a location or time period where PG&E could not make the capacity available because PG&E was already deficient in those locations or time periods. As a result, these terms and/or conditions were unreasonable. Please see Attachments 16-19 for evidence of communications with the counterparties mentioned above.
 - ii. One potential counterparty submitted a non-conforming offer in the second phase of PG&E’s Multi-Year RA Solicitation. This offer was for a bundled product that included energy, capacity, and renewable energy credits. PG&E is not able to pursue renewable energy credits through its bundled procurement plan because PG&E is required to follow its RPS Plan when buying and selling renewable energy credits. PG&E’s current RPS Plan does not allow PG&E to buy renewable energy credits. As a result, PG&E considers this an unreasonable term. Please see Attachment 20 for evidence of communication with the counterparty mentioned above.

Attachment 1

[REDACTED]

From: [REDACTED]
Sent: Friday, September 25, 2020 4:55 PM
To: [REDACTED]
Cc: RA_Solicitations; [REDACTED]
Subject: RE: Request for Offers to Purchase [REDACTED] Resource Adequacy Products from [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hi [REDACTED]

Thank you for submitting your offer in response to [REDACTED] issued on [REDACTED]. We appreciate your participation in [REDACTED]'s process, but unfortunately based on [REDACTED]'s review of the offers received, the offer submitted by PG&E was not shortlisted in this solicitation.

Please feel free to contact me with any questions you may have.

Thank you again,

[REDACTED]

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Friday, September 18, 2020 11:53 AM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Request for Offers to Purchase [REDACTED] Resource Adequacy Products from [REDACTED]

[REDACTED]

[REDACTED] and [REDACTED]

We are pleased to submit bids to purchase Local RA from [REDACTED]. Our preference, as provided in the bid form is to purchase the RA outright from [REDACTED]. If the only means by which [REDACTED] can make its Local RA available to PG&E in any particular month would be for PG&E to sell [REDACTED] System RA or Fresno RA in that same month, PG&E would be interested in pursuing simultaneous purchase and sales transactions (our term for RA swaps) with a cost premium to [REDACTED]'s advantage.

An additional preference for PG&E's bids is to use a long form EEI as opposed to a WSPP.

Thanks,

PG&E

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

-
-

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: Wednesday, October 21, 2020 8:47 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: [REDACTED] RA Solicitation - Request for Bids Cal [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hi [REDACTED]
Apologies for the delay in responding. Thank you for your response to this RFP. Unfortunately, your bids were outbid by other respondents.
We are currently working on these contracts with other counterparties, however if anything else opens up in the future we will let you know, and will continue to include your entity for any future RFPs.

If you have any questions or concerns, please feel free to reach back.

Thank you,

[REDACTED]

From: [REDACTED]
Sent: Thursday, October 15, 2020 1:20 PM
To: [REDACTED]@pge.com>
Cc: [REDACTED] RA_Solicitations
<RASolicitations@pge.com>
Subject: RE: [REDACTED] RA Solicitation - Request for Bids Cal [REDACTED]

Thank you [REDACTED] we'll notify winning counterparties early next week.
Have a great weekend!

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Wednesday, October 14, 2020 8:06 AM
To: [REDACTED]
Cc: [REDACTED] RA_Solicitations
<RASolicitations@pge.com>
Subject: RE: [REDACTED] RA Solicitation - Request for Bids Cal [REDACTED] ue Oct 16@ 2PM PPT

[REDACTED]

[REDACTED]

I have attached PG&E's response to the [REDACTED] RA Solicitation.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 13, 2020 9:35 AM
Cc: [REDACTED]
Subject: RE: [REDACTED] RA Solicitation - Request for Bids Cal [REDACTED] due Oct 16@ 2PM PPT

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hello,
Just wanted to clarify the capacity sales below are for Cal [REDACTED] the email is showing [REDACTED] by error. Please use attached template to submit your responses.

Thank you,

[REDACTED]

From [REDACTED]
Sent: Tuesday, October 13, 2020 8:25 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED] RA Solicitation - Request for Bids Cal [REDACTED] due Oct 16@ 2PM PPT

Greetings,

[REDACTED]

From: [REDACTED]
Sent: Friday, September 25, 2020 10:37 AM
To: [REDACTED]
Cc: RA_Solicitations; [REDACTED]
Subject: RE: RA Solicitation - [REDACTED] Resource Adequacy Products with [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hi [REDACTED]

Thank you for participating in [REDACTED] RA solicitation. After reviewing several responses to the solicitation [REDACTED] will not be able to award RA to PG&E at this time. However, if something changes with the participants that have been selected, I will be sure to let you know. In the near term, if [REDACTED]s to transact with PG&E, [REDACTED] would require using the WSPP confirm.

However, for future transactions with PG&E, we are requesting the [REDACTED] to review PG&E's draft of the long form EEI. [REDACTED] would like to begin the process in getting the long form EEI approved in order to enable [REDACTED] to more easily transact with PG&E in the future.

Thanks again and have a good weekend!

From: [REDACTED]@pge.com]
Sent: Friday, September 18, 2020 4:27 PM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: RA Solicitation - [REDACTED] Resource Adequacy Products with [REDACTED]

[REDACTED]

We are pleased to submit bids to purchase Local RA from [REDACTED]. Our preference, as provided in the bid form attached, is to purchase the RA outright from [REDACTED]. If the only means by which [REDACTED] can make its Local RA available to PG&E in any particular month would be for PG&E to sell [REDACTED] System RA or Fresno RA in that same month, PG&E would be interested in pursuing simultaneous purchase and sales transactions (our term for RA swaps) with a price premium to [REDACTED]s advantage.

An additional preference for PG&E's bids is to use a long form EEI as opposed to a WSPP.

Thanks,

PG&E

[REDACTED]

From: [REDACTED]
Sent: Friday, October 16, 2020 12:21 PM
To: [REDACTED] RA_Solicitations
Subject: RE: Sierra Resource Adequacy

*****CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*****

We are all sold out of RA for [REDACTED] If you would like to know more about our future RA availability, please give me a call.

Thanks

[REDACTED]

----- Original message -----

From: [REDACTED]@pge.com>
Date: 10/16/20 10:43 AM (GMT-08:00)
To: [REDACTED]@pge.com>, RA_Solicitations <RASolicitations@pge.com>
Cc: [REDACTED]
Subject: RE: Sierra Resource Adequacy

[REDACTED]

We continue to be interested in Sierra RA for [REDACTED] We would be willing to do a bilateral transaction. Is there any interest in selling to PG&E?

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 10, 2020 7:52 AM
To: RA_Solicitations <RASolicitations@pge.com>; [REDACTED]@pge.com>
Cc: [REDACTED]
Subject: RE: Sierra Resource Adequacy

*****CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*****
Thank you, I have forwarded these notes to [REDACTED] [REDACTED] is your best contact for these sort of inquiries.

From: RA_Solicitations <RASolicitations@pge.com<mailto:RASolicitations@pge.com>>
Sent: Thursday, September 10, 2020 7:41 AM
To: [REDACTED]@pge.com<mailto:[REDACTED]@pge.com>>; [REDACTED]
Subject: RE: Sierra Resource Adequacy

[REDACTED]
We are also interested in [REDACTED]

Thanks,

PG&E RA Team

From: [REDACTED]@pge.com<mailto:[REDACTED]@pge.com>>
Sent: Wednesday, September 2, 2020 5:20 PM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com<mailto:RASolicitations@pge.com>>
Subject: Sierra Resource Adequacy

[REDACTED]
I am reaching out because PG&E is interested in purchasing RA from the Sierra Local Capacity Area for [REDACTED]. I understand that [REDACTED] owns rights to capacity in this Local Capacity Area, and I want to see if [REDACTED] is interested in participating in PG&E's upcoming Resource Adequacy solicitation. The solicitation will launch in mid-September. PG&E could also be interested in negotiations; however, we strongly prefer to transact via solicitation.

Please let me know if you are interested in exploring options to transact Sierra Local Capacity, or if there is any additional information you need from PG&E first.

Thanks,

[REDACTED]
Pacific Gas & Electric Company
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, August 31, 2020 3:23 PM
To: [REDACTED]
Cc: RA_Solicitations
Subject: RE: North Coast North Bay RA

Thanks for letting us know [REDACTED]

Take care,
[REDACTED]

[REDACTED]
Pacific Gas & Electric Company
[REDACTED]

From: [REDACTED]
Sent: Monday, August 31, 2020 3:21 PM
To: [REDACTED]@pge.com>
Subject: RE: North Coast North Bay RA

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Thanks for reaching out. Unfortunately I have sold my NCNB Local RA Capacity thru [REDACTED] Please keep us in mind for other future RA solicitations. Keep safe and healthy.

Thanks,
[REDACTED]

From: [REDACTED]@pge.com]
Sent: Monday, August 31, 2020 2:51 PM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: North Coast North Bay RA

[REDACTED]

I am reaching out because PG&E is interested in purchasing RA from the North Coast North Bay (NCNB) Local Capacity Area for [REDACTED]. Given that [REDACTED] owns rights to capacity in this Local Capacity Area, I want to see if [REDACTED] is interested in participating in PG&E's upcoming Resource Adequacy solicitation. The solicitation will launch in mid-September. PG&E could also be interested in negotiations; however, we strongly prefer to transact via solicitation.

Please let me know if you are interested in exploring options to transact NCNB Local Capacity, or if there is any additional information you need from P&GE first.

Thanks,

[Redacted]

[Redacted]

Pacific Gas & Electric Company

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: Friday, October 16, 2020 8:18 AM
To: [REDACTED]
Cc: [REDACTED]; charles.janecek@paconsulting.com; [REDACTED] RA Solicitation
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

[REDACTED]

Thanks for the response. We understand the timing considerations. If [REDACTED] reconsiders, we continue to be interested in the Sierra MWs.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Thursday, October 15, 2020 2:46 PM
To: [REDACTED]@pge.com>; [REDACTED]@pge.com>
Cc: [REDACTED]; charles.janecek@paconsulting.com; [REDACTED]
[REDACTED]@pge.com>
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

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[REDACTED]

I just received word back from [REDACTED] team. They have some concerns with the contract language in the confirms. Due to the short time frame it doesn't appear we will be able to move forward with the Sierra/Fresno swap. I certainly appreciate your time and effort on our bid and look forward to working with you all on future deals.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Thursday, October 15, 2020 11:37 AM

Hi [REDACTED]

Just checking in to see if you will be providing your shortlist response this morning?

Best,

[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>

Sent: Tuesday, October 13, 2020 7:51 PM

To: [REDACTED]

Cc: [REDACTED] charles.janecek@paconsulting.com; [REDACTED] [\[REDACTED\]@pge.com](mailto:[REDACTED]@pge.com); [REDACTED] [\[REDACTED\]@nse.com](mailto:[REDACTED]@nse.com)

Subject: PG&E | Important information regarding your Bid | [REDACTED]

Dear [REDACTED]

Please see the attached PDF document and corresponding Excel and Word files for information regarding your bid.

Thank you,
PG&E Bid Team

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 10, 2020 9:14 AM
To: RA Solicitations; [REDACTED]
Cc: [REDACTED] charles.janecek@paconsulting.com; [REDACTED]
Subject: RE: [EXTERNAL]RE: PG&E | Important information regarding your Bid | --
[REDACTED]

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Hi [REDACTED]

Sorry for not responding. I actually sold the [REDACTED] offered to another party shortly after. I have [REDACTED] remaining if PG&E has begun looking at its [REDACTED] requirements.

[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Thursday, September 10, 2020 10:52 AM
To: [REDACTED]@pge.com>; [REDACTED]
Cc: [REDACTED] RA_Solicitations <RASolicitations@pge.com>;
charles.janecek@paconsulting.com; [REDACTED]@pge.com>; [REDACTED]@pge.com>
Subject: [EXTERNAL]RE: PG&E | Important information regarding your Bid [REDACTED]

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Hi [REDACTED]

Hope all is well. Following up on this notification, would [REDACTED] be interested in exploring alternative structures for this product?

Best,

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Monday, August 31, 2020 7:39 PM
To: [REDACTED]

Cc [REDACTED] RA Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com; [REDACTED]
[REDACTED]@pge.com>; [REDACTED]@pge.com>

Subject: PG&E | Important information regarding your Bid | [REDACTED]

Dear [REDACTED]

Please see the attached PDF document for information regarding your bid.

Thank you,
PG&E Bid Team

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 3, 2020 5:32 PM
To: [REDACTED]
Cc: RA_Solicitations
Subject: Re: Sierra Resource Adequacy

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Thank you for the quick response [REDACTED] I don't think there is anything to pursue because we are pretty far along with the other party for [REDACTED] and beyond.

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Thursday, September 3, 2020 5:23:58 PM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra Resource Adequacy

Hi [REDACTED]

Thanks again for your responses this morning.

[REDACTED]

We are not in the market for additional [REDACTED] capacity.

Let me know if you have any further questions about pursuing an RA-only contract. If you're open to this direction, our preference is to pursue through our solicitation, which will launch mid-month.

One last note – I'll be out of the office tomorrow through next Thursday; please be sure to 'cc our solicitations inbox and one of my colleagues will be able to work with you in my absence.

Best,

[REDACTED]

[REDACTED]

Pacific Gas & Electric Company

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 3, 2020 10:57 AM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra Resource Adequacy

[REDACTED]

I am confirming receipt of your reply. I am not available at noon, but I will respond to your comments below today.

Thanks,
[REDACTED]

[REDACTED]
Pacific Gas & Electric Company
[REDACTED]

From: [REDACTED]
Sent: Thursday, September 3, 2020 10:25 AM
To: [REDACTED]@pge.com>
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra Resource Adequacy

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Is 12:00 PM PT a good time for a call today?

From: [REDACTED]
Sent: Thursday, September 3, 2020 10:18 AM
To: [REDACTED]@pge.com>
Cc: 'RA_Solicitations' <RASolicitations@pge.com>
Subject: RE: Sierra Resource Adequacy

In addition to the below thoughts I propose the following:

[REDACTED]

That will give PG&E their desired capacity and allow us to participate in the upcoming RA solicitation [REDACTED]
[REDACTED]

[REDACTED]

Thank you.

From: [REDACTED]
Sent: Thursday, September 3, 2020 9:59 AM

To: [REDACTED]@pge.com>
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra Resource Adequacy

[REDACTED]

Thank you.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Wednesday, September 2, 2020 5:10 PM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: Sierra Resource Adequacy

[REDACTED]

I am reaching out because PG&E is interested in purchasing RA from the Sierra Local Capacity Area for [REDACTED]. I understand that [REDACTED] owns rights to capacity in this Local Capacity Area, and I want to see if [REDACTED] would be

interested in participating in PG&E's upcoming Resource Adequacy solicitation. The solicitation will launch in mid-September. PG&E could also be interested in negotiations; however, we strongly prefer to transact via solicitation.

Please let me know if you are interested in exploring options to transact Sierra Local Capacity, or if there is any additional information you need from PG&E first.

Thanks,

[Redacted]

[Redacted]

Pacific Gas & Electric Company

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: Friday, October 16, 2020 11:35 AM
To: RA_Solicitations; [REDACTED]
Subject: RE: Kern RA

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Thanks [REDACTED] as of right now, our available local Kern capacity is fully contracted through [REDACTED] but if that changes for any reason, I'll let you know.

[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Friday, October 16, 2020 10:53 AM
To: [REDACTED]@pge.com>; [REDACTED]@pge.com>; [REDACTED]
Cc: [REDACTED]
Subject: RE: Kern RA

WARNING: This email originated from outside of [REDACTED]

Thanks. I knew this but it fell out of my head.

Let us know if you have any capacity available. We can try to structure a bilateral transaction in a number of ways.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Friday, October 16, 2020 10:50 AM
To: [REDACTED]@pge.com>; [REDACTED]@pge.com>; [REDACTED]; RA_Solicitations <RASolicitations@pge.com>
Cc: [REDACTED]
Subject: RE: Kern RA

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

He [REDACTED] [REDACTED] is no longer managing these assets, but I have copied [REDACTED] it [REDACTED] on this email so that you two can connect.

Thanks,

[REDACTED]

From: [REDACTED]@pge.com>

Sent: Friday, October 16, 2020 12:47 PM

To: [REDACTED]@pge.com>; [REDACTED]

[REDACTED]; RA_Solicitations <RASolicitations@pge.com>

Subject: RE: Kern RA

[REDACTED]

PG&E is still looking for Kern capacity in [REDACTED]. Please let us know if resources are still available and whether you are interested in selling to PG&E.

Thanks,

From: [REDACTED]@pge.com>

Sent: Tuesday, September 1, 2020 3:11 PM

To: [REDACTED]

Cc: RA_Solicitations <RASolicitations@pge.com>

Subject: Kern RA

[REDACTED] and [REDACTED]

I am reaching out because PG&E is interested in purchasing RA from the Kern Local Capacity Area for [REDACTED]. I know that [REDACTED] owns rights to capacity in this Local Capacity Area, and I want to see if [REDACTED] is interested in participating in PG&E's upcoming Resource Adequacy solicitation. The solicitation will launch in mid-September. PG&E could also be interested in negotiations; however, we strongly prefer to transact via solicitation.

Please let me know if you are interested in exploring options to transact Kern Local Capacity, or if there is any additional information you need from PG&E first.

Thanks,

[REDACTED]

Pacific Gas & Electric Company

[REDACTED]@pge.com



[REDACTED]

From: [REDACTED]
Sent: Wednesday, September 2, 2020 1:05 PM
To: [REDACTED]
Cc: [REDACTED] RA_Solicitations; charles.janecek@paconsulting.com; [REDACTED]
Subject: RE: RE: PG&E | Important information regarding your Bid | -- [REDACTED]

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Hi,

Thank you for the follow-up. No, we are not interested in moving forward with the volume we were shortlisted for.

Also, we do not have any local area excess to sell.

Thanks,

From: [REDACTED]@pge.com>
Sent: Wednesday, September 2, 2020 10:57 AM
To: [REDACTED]@pge.com>; [REDACTED]
Cc: [REDACTED] RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com; [REDACTED]@pge.com>
Subject: [EXTERNAL] RE: PG&E | Important information regarding your Bid | -- [REDACTED]

CAUTION: This email originated from outside of [REDACTED]. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[REDACTED]

Acceptance of shortlisted volumes in PG&E's Multiyear Solicitation was due yesterday by 5pm PPT. This email confirms that PG&E did not receive a response from [REDACTED]

Separately, I want to let you know that PG&E is seeking additional capacity offers in Bay Area, Kern, North Coast / North Bay, Sierra, and/or Stockton Local Capacity Areas for years [REDACTED]. If [REDACTED] is interesting in exploring options to sell PG&E capacity in the above Local Capacity Areas, please respond to this email. If there is any additional information you need from PG&E, please let me know.

Thanks,

[REDACTED]

Pacific Gas & Electric Company
[REDACTED]

From: [REDACTED]@pge.com>

Sent: Monday, August 31, 2020 7:36 PM

To: [REDACTED]

Cc: [REDACTED] RA Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com; [REDACTED]
[REDACTED]@pge.com>; [REDACTED]@pge.com>

Subject: PG&E | Important information regarding your Bid | [REDACTED]

Dear [REDACTED]

Please see the attached PDF document and corresponding Excel and Word files for information regarding your bid.

Thank you,
PG&E Bid Team

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 3, 2020 4:58 PM
To: [REDACTED]
Cc: RA_Solicitations; charles.janecek@paconsulting.com
Subject: Re: PG&E | Important information regarding your Bid | [REDACTED]

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This is the only length we have in local RA.

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From: [REDACTED]<[REDACTED]@pge.com>
Sent: Thursday, September 3, 2020 4:53:56 PM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com <charles.janecek@paconsulting.com>
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

[REDACTED]

We do not have a need for [REDACTED] at this point. Do you have any other proposals we could review?

Thanks,

From: [REDACTED]
Sent: Wednesday, September 2, 2020 10:52 AM
To: [REDACTED]<[REDACTED]@pge.com>; [REDACTED]<[REDACTED]@pge.com>; [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

[REDACTED] if PG&E is open to [REDACTED] then [REDACTED] as excess [REDACTED] and open to [REDACTED] or any PG&E [REDACTED]

[REDACTED]

Cheers,

From: [REDACTED] <[REDACTED]@pge.com>

Sent: Wednesday, September 2, 2020 10:42 AM

To: [REDACTED] <[REDACTED]@pge.com>; [REDACTED]

Cc: RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com

Subject: RE: PG&E | Important information regarding your Bid [REDACTED]

Hello,

While PG&E has already responded to bids associated with the [REDACTED] PG&E is seeking additional capacity offers in Bay Area, Kern, North Coast / North Bay, Sierra, and/or Stockton Local Capacity Areas for year [REDACTED]. If your company is interesting in exploring options to sell PG&E capacity in the above Local Capacity Areas, please respond to this email. If there is any additional information you need from PG&E, feel free to reach out.

Kind regards,

PG&E

This correspondence is for discussion purposes only. It is not an offer to buy or sell. Any agreements between the parties are subject to PG&E senior management approval and the prior execution of definitive documents.

From: [REDACTED]

Sent: Monday, August 31, 2020 8:30 PM

To: [REDACTED] <[REDACTED]@pge.com>; [REDACTED]

Cc: RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com; [REDACTED] <[REDACTED]@pge.com>

Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Please find attached [REDACTED] final volume award notification.

Cheers,

From: [REDACTED] <[REDACTED]@pge.com>

Sent: Monday, August 31, 2020 7:36 PM

To: [REDACTED]

Cc: [REDACTED] RA_Solicitations <RASolicitations@pge.com>;

charles.janecek@paconsulting.com; [REDACTED] <[REDACTED]@pge.com>

Subject: PG&E | Important information regarding your Bid [REDACTED]

Dear [REDACTED]

Please see the attached PDF document and corresponding Excel and Word files for information regarding your bid.

Thank you,
PG&E Bid Team







[REDACTED]

From: [REDACTED]
Sent: Monday, October 19, 2020 8:33 AM
To: [REDACTED]
Cc: RA_Solicitations; charles.janecek@paconsulting.com; RA
Subject: Re: PG&E 2020 Multi-Year RA Solicitation - Phase 2

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Thanks for the note, [REDACTED] is already in discussions and papering transactions with other buyers. If anything falls through, I'll let you know for the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

On Oct 16, 2020, at 10:25 AM, [REDACTED]@pge.com> wrote:

[REDACTED]

While we appreciate that you aren't moving forward with our solicitation, we continue to be interested in purchasing the NCNB you mentioned that [REDACTED] has. We would be willing to buy the NCNB RA outright at a price of [REDACTED]

Thanks,

[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Friday, October 9, 2020 10:09 AM
To: [REDACTED]@pge.com>
Cc: charles.janecek@paconsulting.com; [REDACTED] RA_Solicitations <RASolicitations@pge.com>
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

[REDACTED]

Thank you for letting us know.

Best,

[REDACTED]

From: [REDACTED]
Sent: Thursday, October 8, 2020 7:36 PM
To: [REDACTED]@pge.com>
Cc: charles.janecek@paconsulting.com; [REDACTED] RA_Solicitations
<RASolicitations@pge.com>
Subject: Re: PG&E 2020 Multi-Year RA Solicitation - Phase 2

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

[REDACTED] and PG&E RA team,
I wanted to inform you that [REDACTED] is no longer in need of the MWs we had bid for on Monday. We are now in compliance and are no longer buying. Thank you for allowing us to participate in the solicitation process.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

On Oct 6, 2020, at 3:55 PM [REDACTED]@pge.com> wrote:

[REDACTED]

What is the quantity of the NCNB strip available? Is this quantity impacted by how we award you re: your conforming bids (i.e. if we award you the kern bids you have submitted, does the offer go away)? Since this strip proposal is non-conforming, we cannot consider it until your conforming bids are disposed of first.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 6, 2020 11:11 AM
To: [REDACTED]
Cc: charles.janecek@paconsulting.com; [REDACTED]
RA_Solicitations <RASolicitations@pge.com>
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

Thanks [REDACTED]

We will follow up soon.

From: [REDACTED]
Sent: Tuesday, October 6, 2020 11:10 AM
To: [REDACTED]@pge.com>
Cc: charles.janecek@paconsulting.com; [REDACTED]
RA_Solicitations <RASolicitations@pge.com>
Subject: Re: PG&E 2020 Multi-Year RA Solicitation - Phase 2

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For the strip, I would do an even swap and we could negotiate the market price of the legs, anywhere from [REDACTED] would recommend as market. You're privy to much more pricing than I see, so I would look to your insight. If you do become interested in the strip in the very near future, let me know.

Thanks [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]@pge.com>
Date: Tuesday, October 6, 2020 at 11:06 AM
To: [REDACTED]
Cc: "charles.janecek@paconsulting.com" <charles.janecek@paconsulting.com>, [REDACTED] RA_Solicitations <RASolicitations@pge.com>
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

[REDACTED]

Yeah, we are not entertaining strips at this point as conforming offers. We can consider it as non-conforming. What is the quantity and price for each leg?

From: [REDACTED]
Sent: Tuesday, October 6, 2020 11:05 AM
To: [REDACTED]@pge.com>
Cc: charles.janecek@paconsulting.com; [REDACTED]
RA_Solicitations <RASolicitations@pge.com>
Subject: Re: PG&E 2020 Multi-Year RA Solicitation - Phase 2

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I wasn't sure how to notate that the swap would be for the calendar year, no single month swaps. I also would need the Kern to be with Flex. I just find the form a bit too restrictive that you can't put comments to express the intent of the bid/offer. Thus, only simplified bids were submitted. Again, if you're interested in the swap, please let me know.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]@pge.com>
Date: Monday, October 5, 2020 at 7:19 PM
To: [REDACTED]
Cc: "charles.janecek@paconsulting.com" <charles.janecek@paconsulting.com>, [REDACTED] RA_Solicitations <RASolicitations@pge.com>
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

[REDACTED]

Can you describe the additional NCNB/Kern purchase and sale bid? It is not clear to me why this offer cannot be filled out like this:

<image001.jpg>

Can you clarify what prevents this type of a bid?

Thanks,

[REDACTED]
From [REDACTED]
Sent: Monday, October 5, 2020 4:52 PM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: charles.janecek@paconsulting.com, [REDACTED]
Subject: Re: PG&E 2020 Multi-Year RA Solicitation - Phase 2

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Please see attached indicative bid form from [REDACTED]. Also attached is the edited confirm which are the same changes we've requested regarding the changes to the CPUC template and the information needed to complete the template. Please note, when bidding for System [REDACTED] is indifferent if that comes from North or South System. We were not able to make that notation on your bid form and we did not want to overbid for volume. Thus, we bid for North System, but would be fine with South System should that be the product PG&E has to offer. [REDACTED]

[REDACTED] Your bid form isn't intuitive as to how to specify that exact transaction, therefore, if you are interested, please contact me at your earliest convenience.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>
Date: Friday, September 18, 2020 at 4:47 PM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: Charles Janecek <Charles.Janecek@PACONSULTING.COM>
Subject: PG&E 2020 Multi-Year RA Solicitation - Phase 2

To Prospective Participant:

Pacific Gas and Electric Company (“PG&E”) invites your participation in its Resource Adequacy (“RA”) and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
1	System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021 – Dec 2021	Fixed Price \$/kW-month
2	Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021-Dec 2022	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Jan-Dec 2021	Fixed Price \$/kW-month
4	Import Energy *	Buy	5 MW	Jan-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

**PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

The deadline to submit a response is 5:00 pm (PPT), 2 business days after the final NQC list is published by the CAISO. PG&E reserves the right to distribute an updated solicitation timeline to participants when more information is available.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

Please note a few PG&E changes to the Offer and Bid Form functionality. For RA, the allowable count per mutually exclusive group increases from 3 to 6, and the maximum number of groups allowed increases to 10. PG&E has also added the ability to use mutually exclusive groups for import allocation rights.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM) by the deadline indicated in Table 1.

Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Friday 9/18
Offers and Bids due	5 pm (PPT), 2 Business Days after Final NQC list publication
PG&E consults with its PRG regarding its proposed shortlist.	+ 4 Business Days
PG&E notifies participants of shortlist status	+ 2 Business Days
Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	+ 2 Business Days
Target full execution of confirmations	+ 3 Business Days

4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com, with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM).

5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 10, 2020 7:53 AM
To: RA_Solicitations; [REDACTED]
Cc: [REDACTED]
Subject: RE: Sierra Resource Adequacy

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[REDACTED]

Our [REDACTED] Sierra is committed. Any interest in [REDACTED]

[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Thursday, September 10, 2020 7:42 AM
To: [REDACTED]@pge.com; [REDACTED]
Subject: RE: Sierra Resource Adequacy

[REDACTED]

We are also interested in [REDACTED]

Thanks,

The PG&E RA Team.

From: [REDACTED]@pge.com>
Sent: Wednesday, September 2, 2020 5:17 PM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: Sierra Resource Adequacy

[REDACTED]

I am reaching out because PG&E is interested in purchasing RA from the Sierra Local Capacity Area in [REDACTED] for [REDACTED]. I understand that [REDACTED] owns rights to capacity in this Local Capacity Area, and I want to see if [REDACTED] is interested in participating in PG&E's upcoming Resource Adequacy solicitation. The solicitation will launch in mid-September. PG&E could also be interested in negotiations; however, we strongly prefer to transact via solicitation.

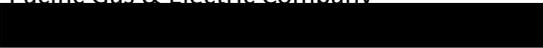
Please let me know if you are interested in exploring options to transact Sierra Local Capacity, or if there is any additional information you need from PG&E first.

Thanks,

[REDACTED]



Pacific Gas & Electric Company



[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 20, 2020 1:02 PM
To: [REDACTED] RA_Solicitations
Cc: Charles.Janecek@PACONSULTING.COM
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

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[REDACTED]

Updated offers below. Happy to discuss our rationale but the bottom line is that this price is below where other transactions have been executed and below the fair value. However, this offer is in line with [REDACTED] and allows both of us to [REDACTED]

Please consider this our best and final offer.

Quantity (MW)	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]
Price (\$/kW-M)		
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]

From: [REDACTED]@pge.com>
Sent: Tuesday, October 20, 2020 12:34 PM
To: [REDACTED] RA_Solicitations <RASolicitations@pge.com>
Cc: Charles.Janecek@PACONSULTING.COM
Subject: Re: PG&E 2020 Multi-Year RA Solicitation - Phase 2

[REDACTED] MW, either [REDACTED]

[REDACTED]
[REDACTED] - Energy Transactions
Pacific Gas and Electric Company
[REDACTED]

This correspondence is for discussion purposes only. It is not an offer to buy or sell. Any agreements between the parties are subject to PG&E senior management approval and the prior execution of definitive documents.

From: [REDACTED]
Sent: Tuesday, October 20, 2020 10:33:02 AM
To: [REDACTED]@pge.com>; RA_Solicitations <RASolicitations@pge.com>

Cc: Charles.Janecek@PACONSULTING.COM <Charles.Janecek@PACONSULTING.COM>

Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

We're likely to go a different direction then but can you clarify your bid please. How many MWs, [REDACTED]

From: [REDACTED]@pge.com>

Sent: Tuesday, October 20, 2020 11:54 AM

To: [REDACTED]; RA_Solicitations <RASolicitations@pge.com>

Cc: Charles.Janecek@PACONSULTING.COM

Subject: Re: PG&E 2020 Multi-Year RA Solicitation - Phase 2

[REDACTED]

Thanks for checking in. We are sticking with our counter of [REDACTED] kW-no.

Thanks,
[REDACTED]

[REDACTED]
Energy Transactions
Pacific Gas and Electric Company
[REDACTED]

This correspondence is for discussion purposes only. It is not an offer to buy or sell. Any agreements between the parties are subject to PG&E senior management approval and the prior execution of definitive documents.

From: [REDACTED]

Sent: Tuesday, October 20, 2020 9:51:47 AM

To: [REDACTED]; RA_Solicitations <RASolicitations@pge.com>

Cc: Charles.Janecek@PACONSULTING.COM <Charles.Janecek@PACONSULTING.COM>

Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

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Hey [REDACTED] We'd like to get this wrapped up in the next few days. Can you please let me know if you intend to move forward? Thanks.

From: [REDACTED]@pge.com>

Sent: Thursday, October 15, 2020 5:31 PM

To: [REDACTED]; RA_Solicitations <RASolicitations@pge.com>

Cc: Charles.Janecek@PACONSULTING.COM

Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

Thanks for the update [REDACTED] I will include this info in my discussions internally.

From: [REDACTED]

Sent: Thursday, October 15, 2020 3:16 PM

To: [REDACTED]@pge.com; RA_Solicitations <RASolicitations@pge.com>

Cc: Charles.Janecek@PACONSULTING.COM

Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Quick update for you... I've started to say yes to other LSEs who need the Stockton RA from [REDACTED] Still have enough to meet your [REDACTED] MW requested quantity. All getting done north of [REDACTED] kW-Mo. My updated quantities on offer are below.

Quantity (MW)	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]
Price (\$/kW-M)		
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]

From: [REDACTED]
Sent: Wednesday, October 14, 2020 5:33 PM
To: [REDACTED]@pge.com; RA_Solicitations <RASolicitations@pge.com>
Cc: Charles.Janecek@PACONSULTING.COM
Subject: Re: PG&E 2020 Multi-Year RA Solicitation - Phase 2

Sounds good, thank you.

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From: [REDACTED]@pge.com
Sent: Wednesday, October 14, 2020 5:08:01 PM
To: [REDACTED]; RA_Solicitations <RASolicitations@pge.com>
Cc: Charles.Janecek@PACONSULTING.COM <Charles.Janecek@PACONSULTING.COM>
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

Thanks for the quick reply. I hope to get you a response to this offer tomorrow.

Thanks,

From: [REDACTED]
Sent: Wednesday, October 14, 2020 3:06 PM
To: RA_Solicitations <RASolicitations@pge.com>; [REDACTED]@pge.com

Cc: Charles.Janecek@PACONSULTING.COM

Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

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After some discussion and based on your feedback, we can lower our conforming offer for [REDACTED] MWs to [REDACTED] kW-Mo for Stockton Local Unit Contingent RA for [REDACTED] an [REDACTED]. We think this is a favorable outcome for PG&E because it is below the market price of our other transactions and covers your needs in a timely fashion without requiring a long term commitment. We are also willing to accept this price in order to continue the long standing positive relationship between [REDACTED] and PG&E.

Happy to discuss further at your convenience.

Best,
[REDACTED]

From: [REDACTED]

Sent: Monday, October 5, 2020 6:08 PM

To: 'RA_Solicitations' <RASolicitations@pge.com> [REDACTED] <[\[REDACTED\]@pge.com](mailto:[REDACTED]@pge.com)>

Cc: Charles.Janecek@PACONSULTING.COM

Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

PG&E Procurement Team,

Please see attached for two items:

1. A conforming offer for [REDACTED] MWs of Stockton RA for [REDACTED] and [REDACTED]
2. A letter outlining several non-conforming offers for your review that seek to [REDACTED] between [REDACTED] and PG&E as either [REDACTED]

We look forward to discussing these offers at your convenience.

Best,
[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Thursday, October 1, 2020 4:06 PM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: Charles.Janecek@PACONSULTING.COM
Subject: PG&E 2020 Multi-Year RA Solicitation - Phase 2 - Timeline Update

Hello,

Due to the release of the Final NQC list by the CAISO, we would like to inform you of the revised schedule for the remainder of the solicitation.

Schedule for Offers and Bids

The table below provides the remaining tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Friday, 9/18
Offers and Bids due	Monday, 10/5 by 5 pm (PPT)
PG&E consults with its PRG regarding its proposed shortlist.	Friday, 10/9
PG&E notifies participants of shortlist status	Tuesday, 10/13
Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	Wednesday, 10/14 by COB
Target full execution of confirmations	Friday, 10/16

Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com, with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM).

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 20, 2020 12:14 PM
To: [REDACTED]; Charles.Janecek@PAConsulting.com
Cc: [REDACTED]; RA_Solicitations
Subject: RE: PG&E and [REDACTED] Call

[REDACTED]

We have determined that we are willing to pay [REDACTED] kW-month for the Sierra capacity in [REDACTED]. Please let us know if you are interested in moving forward at this price.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Thursday, October 15, 2020 3:05 PM
To: [REDACTED]; Charles.Janecek@PAConsulting.com
Cc: [REDACTED]; RA_Solicitations
<RASolicitations@pge.com>
Subject: RE: PG&E and [REDACTED] Call

[REDACTED]

I understand. I will present this to my management and we will go from there. I appreciate the quick response!

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Thursday, October 15, 2020 3:02 PM
To: [REDACTED]; Charles.Janecek@PAConsulting.com
Cc: [REDACTED]; RA_Solicitations
<RASolicitations@pge.com>
Subject: RE: PG&E and [REDACTED] Call

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hi [REDACTED]

After discussing this internally, we are not able to reduce our pricing at such time due to the short contract of the deal, the relative small project size, plus unknowns such as risk and transaction costs. We also do not feel confident in being able to come online in [REDACTED] so the [REDACTED] online date would not be changed. With this said, we are going to stick to our original offer pricing and online dates. We apologize that we are not able to bring our pricing down and hope you can understand our reasonings. Please let us know if you have any further questions. Thank you.

Regards,

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Thursday, October 15, 2020 8:44 AM
To: [REDACTED]; Charles.Janecek@PAConsulting.com
Cc: [REDACTED]@pge.com>; RA_Solicitations
<RASolicitations@pge.com>
Subject: RE: PG&E and [REDACTED] Call

[REDACTED]

Great,

Thanks [REDACTED]

From: [REDACTED]
Sent: Thursday, October 15, 2020 8:42 AM
To: [REDACTED]@pge.com>; Charles.Janecek@PAConsulting.com
Cc: [REDACTED]@pge.com>; RA_Solicitations
<RASolicitations@pge.com>
Subject: RE: PG&E and [REDACTED] Call

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

[REDACTED]

Thank you for the detailed notes and pointing to the [REDACTED] we discussed yesterday. Let us circle up today internally and then we will plan to provide updated pricing and discuss the potential to [REDACTED] and send over by end of week. .

Regards,

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Thursday, October 15, 2020 7:47 AM
To: Charles.Janecek@PAConsulting.com
Cc: [REDACTED]
[REDACTED]@pge.com>; RA_Solicitations <RASolicitations@pge.com>
Subject: RE: PG&E and [REDACTED] Call

[REDACTED]

Charles,

Please see the call notes for our call yesterday.

[REDACTED] or [REDACTED]

Please let us know if you wish to clarify anything or feel some details are missing.

Thanks,

Attendees:

- [REDACTED]
- PG&E: [REDACTED]
- PA Consulting: Charles Janecek

Call Notes

- [REDACTED] did not receive excel bidform from [REDACTED]
 - PG&E will follow up and check what happened to make sure our messages reach [REDACTED] going forward.
- PG&E stated it would like to accept [REDACTED]'s proposal submitted via email if can improve on pricing a bit. Since it would be for [REDACTED] PG&E would have a hard time justifying pricing above [REDACTED] PG&E would also be open to counters with [REDACTED] as well.
- PG&E also asked if it would be possible to [REDACTED] In the [REDACTED] potentially?
 - [REDACTED] responded that it is not clear on penalties if it contracts sooner but doesn't deliver on [REDACTED] has been turning down customers, and cannot make an [REDACTED] start, but does think [REDACTED] is possible. [REDACTED] would find it helpful to get more clarity on what the definition of start date is and how it is dependent on when NQC is received for the project.
 - PG&E Responded that the first month of delivery is when the resource can include you in supply plan. PG&E also pointed out that it could potentially pay a higher price if it can claim project is online sooner.
 - [REDACTED] asked what the downside is if the schedule slips.
 - PG&E responded that [REDACTED] wouldn't be paid for that month.
- [REDACTED] asked if it might be helpful to incorporate contractual rules stipulating price depending on [REDACTED]
 - PG&E responded that it's not an ideal scenario, and that PG&E doesn't like to change price after contracting.
- PG&E asked if interconnection issues plague [REDACTED]'s development timeline generally speaking
 - [REDACTED] responded that it's not so much interconnection, but the all the components that go into development are hard to achieve under 12 months start to finish.
- PG&E reiterated that the two main takeaways from it's perspective are the price counter and that there are benefits to PG&E and the broader market [REDACTED]
 - As far as next steps and schedule, PG&E is hoping to wrap up by next week, so a price counter would be helpful this week.
 - PG&E also agreed to write a clarification of delivery start in the contract

-----Original Appointment-----

From: [REDACTED]

Sent: Tuesday, October 13, 2020 2:57 PM

To: [REDACTED]; Charles.Janecek@PAConsulting.com; [REDACTED]

Subject: PG&E and [REDACTED] Call

When: Wednesday, October 14, 2020 2:00 PM-2:30 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

Call to discuss [REDACTED]'s non-conforming offer in PG&E's RA Solicitation

[Join Microsoft Teams Meeting](#)

[REDACTED] nited States, San Francisco (Toll)

Conference ID: [REDACTED]

[Local numbers](#) | [Reset PIN](#) | [Learn more about Teams](#) | [Meeting options](#)

Need Help with Teams? Click on the Help option in this invite to connect you directly to our Teams at PG&E Training site!

[Help](#)

[REDACTED]

From: [REDACTED]
Sent: Friday, October 9, 2020 1:49 PM
To: [REDACTED] RA Solicitations
Cc: Charles Janecek; [REDACTED]
Subject: RE: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

[REDACTED]

We have reviewed your offer and unfortunately are unable to make all of the months in [REDACTED] requested available to acquire the Kern. Please let us know if there are other options for us to acquire the Kern, as we continue to be interested in at least a subset of that capacity, and are willing to purchase it a [REDACTED] kW-mo.

Thanks,

[REDACTED]

From [REDACTED]
Sent: Monday, October 5, 2020 12:15 PM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: Charles Janecek <Charles.Janecek@PACONSULTING.COM>; [REDACTED]
Subject: RE: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2
Importance: High

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Good afternoon PG&E RA Team,

The [REDACTED] can offer PG&E [REDACTED] MW of Kern Local RA for [REDACTED]
[REDACTED] In return [REDACTED] is looking for [REDACTED] and [REDACTED] system RA. Please let me know if this is something PG&E would like to explore further with [REDACTED]

Best regards,

[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Tuesday, September 22, 2020 9:01 AM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: Charles Janecek <Charles.Janecek@PACONSULTING.COM>
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

Dear Market Participant:

PG&E would like to inform all participants that we will evaluate offers to sell to PG&E even if they do not conform to the Offer and Bid Form or the term of the solicitation. These offers will be considered non-conforming, and will be evaluated after offers that are considered conforming. If your offer cannot be captured through the Offer and Bid Form as it is currently structured, please describe your offer in the body of the email in your response to the solicitation.

Kind regards,
PG&E

To Prospective Participant:

Pacific Gas and Electric Company (“PG&E”) invites your participation in its Resource Adequacy (“RA”) and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
1	System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021 – Dec 2021	Fixed Price \$/kW-month
2	Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021-Dec 2022	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Jan-Dec 2021	Fixed Price \$/kW-month
4	Import Energy *	Buy	5 MW	Jan-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

**PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

The deadline to submit a response is 5:00 pm (PPT), 2 business days after the final NQC list is published by the CAISO. PG&E reserves the right to distribute an updated solicitation timeline to participants when more information is available.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented

by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

Please note a few PG&E changes to the Offer and Bid Form functionality. For RA, the allowable count per mutually exclusive group increases from 3 to 6, and the maximum number of groups allowed increases to 10. PG&E has also added the ability to use mutually exclusive groups for import allocation rights.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Friday 9/18
Offers and Bids due	5 pm (PPT), 2 Business Days after Final NQC list publication
PG&E consults with its PRG regarding its proposed shortlist.	+ 4 Business Days
PG&E notifies participants of shortlist status	+ 2 Business Days
Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	+ 2 Business Days
Target full execution of confirmations	+ 3 Business Days

4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com, with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM).

5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

[REDACTED]

From: [REDACTED]
Sent: Friday, September 4, 2020 8:10 AM
To: [REDACTED]
Cc: RA_Solicitations; charles.janecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hi [REDACTED] – To close this out, [REDACTED] is unable to sell the Stockton outright at this time. Best, [REDACTED]

From: [REDACTED]<[REDACTED]@pge.com>
Sent: Thursday, September 3, 2020 6:55 PM
To: [REDACTED]<[REDACTED]@pge.com>; [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

Hi [REDACTED]

Thanks for providing the following proposals. We currently don't have needs in Fresno, and we cannot sell Bay Area, Stockton, NCNB, or Sierra.

Please let us know if there is a price that you would be willing to receive in order for PG&E to purchase the excess Stockton that you have expressed that you have.

Thank you,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 03, 2020 11:59 AM
To: [REDACTED]<[REDACTED]@pge.com>; [REDACTED]<[REDACTED]@pge.com>; [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hello – We reviewed our portfolio and we have come up with a few proposals for your consideration. Hopefully, we can find an opportunity here amid an increasingly tight market. Should you have any questions or want to discuss any additional proposals, please let us know. Best, [REDACTED]

Proposal 1:

	Sells Stockton (MW)	PG&E Sells Stockton (MW)	Price (\$/kW-mo)

Proposal 2:

Sells up to Fresno for an equal volume of GBA, Sierra, Humboldt or NCNB @ equal prices

Proposal 3:

Sells GBA for an equal volume of Stockton @ equal prices

Proposal 4:

Sells GBA for an equal volume of NCNB @ equal prices

From: <@pge.com>
Sent: Wednesday, September 2, 2020 4:32 PM
To: <@pge.com>;
Cc: RA_Solicitations <RASolicitations@pge.com>; charles.ianecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid |

Hi

Thanks for the prompt response. We have system and local in most months as long as it's an even trade. Can you please provide specific simultaneous offers and bids with prices?

Thank you,

<@pge.com>

[Redacted]

From: <@pge.com>
Sent: Wednesday, September 02, 2020 12:56 PM
To: <@pge.com>; <@pge.com>; <@pge.com>;
Cc: RA_Solicitations <RASolicitations@pge.com>; charles.ianecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid |

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hello –

Thank you for reaching out. We do have some small volumes for random months for most of the local areas you are requesting below. Yet, we would need to swap equal volumes of system or local in order to do the transaction. Please let me know how you would like to proceed.

Best,

From: [REDACTED]@pge.com>
Sent: Wednesday, September 2, 2020 1:42 PM
To: [REDACTED]@pge.com>; [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

Hello,

While PG&E has already responded to bids associated with the Multi-Year RA Solicitation – Phase 1, PG&E is seeking additional capacity offers in Bay Area, Kern, North Coast / North Bay, Sierra, and/or Stockton Local Capacity Areas for years [REDACTED]. If your company is interesting in exploring options to sell PG&E capacity in the above Local Capacity Areas, please respond to this email. If there is any additional information you need from PG&E, feel free to reach out.

Kind regards,
PG&E

[REDACTED]@pge.com

From: [REDACTED]
Sent: Tuesday, September 01, 2020 1:51 PM
To: [REDACTED]@pge.com>; [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com; [REDACTED]@pge.com>
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hello – Please find [REDACTED] acceptance attached. If there are any questions or concerns, please let me know.
Best, [REDACTED]

[Redacted]

[Redacted]

From: [Redacted]@pge.com>
Sent: Monday, August 31, 2020 10:38 PM
To: [Redacted]
Cc: [Redacted] RA_Solicitations
<RASolicitations@pge.com>; charles.janecek@paconsulting.com; [Redacted]@pge.com; [Redacted]
[Redacted]@pge.com>
Subject: [EXTERNAL] PG&E | Important information regarding your Bid | [Redacted]

EXTERNAL MAIL. Do not click links or open attachments from unknown senders or unexpected Email.

Dear [Redacted]

Please see the attached PDF document and corresponding Excel and Word files for information regarding your bid.

Thank you,
PG&E Bid Team

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: Friday, September 11, 2020 1:49 PM
To: [REDACTED]
Cc: [REDACTED] RA_Solicitations;
charles.janecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]
[REDACTED]

[REDACTED]

Yes, we are not able to make any quantities available in those areas. Please let me know if you change your approach such that you are willing to sell those excess Kern MWS outright or in exchange for other local areas.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Friday, September 11, 2020 12:50 PM
To: [REDACTED]@pge.com>
Cc: [REDACTED] RA_Solicitations <RASolicitations@pge.com>;
charles.janecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

[REDACTED] would only be in a position to exchange some Kern volumes for Stockton or NCNB volumes, but it sounds like you are looking for those areas as well.

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Thursday, September 10, 2020 4:57 PM
To: [REDACTED]
Cc: [REDACTED] RA_Solicitations <RASolicitations@pge.com>;
charles.janecek@paconsulting.com
Subject: RE: PG&E | Important information regarding your Bid | [REDACTED]

[REDACTED] and [REDACTED]

While PG&E has already responded to bids associated with the Multi-Year RA Solicitation – Phase 1, PG&E is seeking additional capacity offers in Bay Area, Kern, North Coast / North Bay, Sierra, and/or Stockton Local Capacity Areas for years [REDACTED]. If your company is interested in exploring options to sell PG&E capacity in the above Local Capacity Areas, please respond to this email. If there is any additional information you need from PG&E, feel free to reach out.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Monday, August 31, 2020 7:37 PM
To: [REDACTED]
Cc: [REDACTED] RA_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com
Subject: PG&E | Important information regarding your Bid | [REDACTED]

Dear [REDACTED]

Please see the attached PDF document for information regarding your bid.

Thank you,
PG&E Bid Team

[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 13, 2020 5:02 PM
To: [REDACTED]
Cc: RA_Solicitations
Subject: RE: Sierra RA

[REDACTED]

We don't have any NCNB to sell in [REDACTED] unfortunately. We continue to be interested in Sierra [REDACTED] however.

Thanks,

From: [REDACTED]
Sent: Tuesday, October 13, 2020 4:59 PM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>; [REDACTED]@pge.com>
Subject: RE: Sierra RA

Hi [REDACTED]

Thanks for reaching out. I am out of the office this week. [REDACTED] cc'ed, should be able to respond to you in my absence.

Best

[REDACTED]

Pacific Gas & Electric Company
[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 13, 2020 4:17 PM
To: [REDACTED]@pge.com>
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra RA

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hi [REDACTED]

I was not able to free up any [REDACTED] Sierra in time for the PG&E RFP submission deadline. However, things have changed slightly with my positions and I now have some [REDACTED] Sierra. Is PG&E still interested in it? Would PG&E be able to sell [REDACTED] NCNB in return?

Thanks,

[REDACTED]

From: [REDACTED]@pge.com>
Sent: Tuesday, September 1, 2020 10:23 AM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra RA

Think Secure. This email is from an external source.

Yes, that's correct, the solicitation will launch mid-month. You're on our market notification list so please let me know if for whatever reason you don't receive a market notice from us.

Thanks,

[REDACTED]

Pacific Gas & Electric Company
[REDACTED]

From: [REDACTED]
Sent: Tuesday, September 1, 2020 10:04 AM
To: [REDACTED]@pge.com>
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra RA

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Yes, we can initiate via the solicitation. It comes out in a few weeks, correct?

From: [REDACTED]@pge.com>
Sent: Tuesday, September 1, 2020 9:29 AM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra RA

Think Secure. This email is from an external source.

Yes, we can certainly explore a local-for-system swap. Would you be amenable to participating in our solicitation to start things off, and if we aren't able to settle on a transaction structure via that avenue, then moving to a bilateral conversation?

Pacific Gas & Electric Company

From: [REDACTED]
Sent: Tuesday, September 1, 2020 9:07 AM
To: [REDACTED] <[REDACTED]@pge.com>
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: RE: Sierra RA

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

Hi [REDACTED]

It is our preference to transact bi-laterally, we may need to buy system RA in return for certain months.

I am available to discuss in more detail sometime next week.

Thanks,

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@pge.com>
Sent: Tuesday, September 1, 2020 8:54 AM
To: [REDACTED]
Cc: RA_Solicitations <RASolicitations@pge.com>
Subject: Sierra RA

Think Secure. This email is from an external source.

I am reaching out because PG&E is interested in purchasing RA from the Sierra Local Capacity Area for [REDACTED]. I understand that [REDACTED] owns rights to capacity in this Local Capacity Area, and I want to see if [REDACTED] is interested in participating in PG&E's upcoming Resource Adequacy solicitation. The solicitation will launch in mid-September. PG&E could also be interested in negotiations; however, we strongly prefer to transact via solicitation.

Please let me know if you are interested in exploring options to transact Sierra Local Capacity, or if there is any additional information you need from PG&E first.

Thanks

[REDACTED]

[REDACTED]



[REDACTED]

From: [REDACTED]
Sent: Monday, October 5, 2020 4:30 PM
To: RA_Solicitations
Cc: Charles Janecek; [REDACTED]
Subject: RE: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2 [REDACTED]
Attachments: Copy of [REDACTED].xlsb

*******CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*******

PG&E Team-

Below and attached is an offer to sell to PG&E local resource adequacy offers from [REDACTED] from the [REDACTED]. The offer is for local North Coast North Bay resource adequacy bundled with the [REDACTED]. As the bundled product could not be fully captured in the Offer and Bid form, the offer is further described below:

Offer:

[REDACTED]

We are open to discussing different volumes and terms if PG&E is interested in this NCNB and [REDACTED]

Best,

[REDACTED]

[REDACTED]

[REDACTED]

From: RA_Solicitations <RASolicitations@pge.com>
Sent: Tuesday, September 22, 2020 9:01 AM
To: RA_Solicitations <RASolicitations@pge.com>
Cc: Charles Janecek <Charles.Janecek@PACONSULTING.COM>
Subject: RE: PG&E 2020 Multi-Year RA Solicitation - Phase 2

External Sender: Use caution with links/attachments.

Dear Market Participant:

PG&E would like to inform all participants that we will evaluate offers to sell to PG&E even if they do not conform to the Offer and Bid Form or the term of the solicitation. These offers will be considered non-conforming, and will be evaluated after offers that are considered conforming. If your offer cannot be captured through the Offer and Bid Form as it is currently structured, please describe your offer in the body of the email in your response to the solicitation.

Kind regards,
 PG&E

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4	Import Energy *	Buy	5 MW	Jan-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

**PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

The deadline to submit a response is 5:00 pm (PPT), 2 business days after the final NQC list is published by the CAISO. PG&E reserves the right to distribute an updated solicitation timeline to participants when more information is available.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

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PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

Please note a few PG&E changes to the Offer and Bid Form functionality. For RA, the allowable count per mutually exclusive group increases from 3 to 6, and the maximum number of groups allowed increases to 10. PG&E has also added the ability to use mutually exclusive groups for import allocation rights.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Friday 9/18
Offers and Bids due	5 pm (PPT), 2 Business Days after Final NQC list publication
PG&E consults with its PRG regarding its proposed shortlist.	+ 4 Business Days
PG&E notifies participants of shortlist status	+ 2 Business Days
Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	+ 2 Business Days
Target full execution of confirmations	+ 3 Business Days

4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com, with a copy to the Independent Evaluator Charles Janecek (Charles.Janecek@PACONSULTING.COM).

5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

COMPANY CONFIDENTIALITY NOTICE: The information in this e-mail may be confidential and/or privileged and protected by work product immunity or other legal rules. No confidentiality or privilege is waived or lost by mis-transmission. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination, or copying of this e-mail and its attachments, if any, or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by return e-mail and delete this e-mail from your computer system.

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

Downey & Brand
East Bay Community Energy
Ellison Schneider & Harris LLP
Energy Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF

IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy