

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6007E
As of January 21, 2021

Subject: Modifications to Electric Transmission Revenue Requirement Reclassification
Memorandum Account

Division Assigned: Energy

Date Filed: 11-18-2020

Date to Calendar: 11-20-2020

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	01-01-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov



November 18, 2020

Advice 6007-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Modifications to Electric Transmission Revenue Requirement
Reclassification Memorandum Account – Electric Preliminary
Statement Part BK**

Purpose

Pacific Gas and Electric Company (PG&E) submits this Tier 2 advice letter to update the Transmission Revenue Requirement Reclassification Memorandum Account (TRRRMA) - Electric Preliminary Statement Part BK. The TRRRMA was established to track PG&E's revenue requirements for electric facilities which the Federal Energy Regulatory Commission (FERC) subsequently determines are or are not FERC-jurisdictional.¹ PG&E requests authority to update the TRRRMA to remove references to closed FERC proceedings, include language to address situations where costs associated with specific facilities can no longer be included in FERC-jurisdictional rates², provide for the inclusion of an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense, and make other revisions for clarity.

Background

In 1998, PG&E and the other California investor-owned utilities turned operational control of their transmission facilities over to the California Independent System Operator Corporation (CAISO) as part of electric restructuring. Costs for these facilities, which had previously been recovered through California Public Utilities Commission (CPUC or Commission)-jurisdictional rates, would instead be recovered through rates approved by FERC. Because it was unclear whether FERC would ultimately determine that all of the

¹ Resolution E-3574, issued June 24, 1999.

² For purposes of this advice letter, PG&E refers to the costs for network electric transmission facilities that are recovered through PG&E's Transmission Owner (TO) Tariff as being included "FERC-jurisdictional rates." Costs for non-network transmission electric facilities that are recovered through electric distribution rates are referred to as being included in "CPUC-jurisdictional rates."

facilities proposed to be turned over to CAISO operational control were network transmission facilities, PG&E requested the Commission's authorization to establish the TRRRMA. The TRRRMA allows PG&E to track costs related to electric facilities turned over to the CAISO and, where applicable, seek cost recovery in CPUC-jurisdictional rates for any costs that FERC subsequently determines should not be included in FERC-jurisdictional rates.

The Commission approved the TRRRMA in Resolution E-3574 on June 24, 1999. The TRRRMA allows PG&E to record both credits (for facilities where the costs had been recovered in CPUC-jurisdictional rates but that FERC subsequently determines are network transmission facilities and eligible for recovery in FERC-jurisdictional rates) and debits (for costs related to facilities that PG&E proposed to recover in FERC-jurisdictional rates but that were later determined not to be eligible for inclusion in FERC-jurisdictional rates).³ Because the TRRRMA was associated with electric industry restructuring, it references the FERC dockets addressing the CAISO's creation and assumption of the operational control of utility facilities.⁴

Since electric industry restructuring, there have continued to be issues addressed in FERC proceedings about whether specific facilities, and their corresponding costs, should be included in FERC-jurisdictional rates. Recently, two proceedings at FERC have highlighted situations related to the inclusion or exclusion of facilities from FERC-jurisdictional rates. These ongoing proceedings, described in more detail below, support the continued use of TRRRMA to record costs. Separately, the CAISO continues to update its register of facilities that are under the CAISO's operational control. As described below, changes to the CAISO Register of facilities also impact FERC-jurisdictional rates and thus the corresponding costs are appropriate to record in the TRRRMA.

PG&E's Transmission Owner 18 Proceeding (FERC Docket ER16-2320-000)

On July 29, 2016, PG&E filed its eighteenth transmission owner (TO18) case at FERC to recover transmission-related costs for facilities under the CAISO's operational control.⁵ FERC issued a decision in the TO18 Proceeding on October 15, 2020.⁶

PG&E's ability to recover certain costs related to Common, General, and Intangible (CGI) plant in FERC-jurisdictional rates was at issue in the TO18 Proceeding. CGI plant is "a category of FERC Account 101 – Electric Plant in Service, which is applicable to the

³ Resolution E-3574, Finding 9.

⁴ TRRRMA, §§ 4(a) and 4(b).

⁵ *Pacific Gas and Electric Company*, FERC Docket No. ER16-2320-000, et al. (TO18 Proceeding).

⁶ *Pacific Gas and Electric Company*, Opinion No. 572, 173 FERC ¶ 61,045 (2020) (Opinion No. 572), PP 2-3 (describing procedural background).

production, transmission, and distribution functions of electric service. Common plant-in-service is plant used by both production and transmission but cannot be associated with either function directly.”⁷ CGI plant costs can either be assigned directly when used by a single line of business or allocated between lines of business using a labor allocator.⁸

PG&E proposed directly assigning certain CGI plant costs to FERC-jurisdictional rates and allocating other costs between FERC-jurisdictional and CPUC-jurisdictional rates using a labor allocator.⁹ While the TO18 Proceeding was pending at FERC, PG&E recovered all of these costs in FERC-jurisdictional rates. In Opinion No. 572, which was issued October 16, 2020, FERC determined that certain costs PG&E had assigned directly to FERC-jurisdictional rates should instead be allocated between FERC-jurisdictional transmission rates and CPUC-jurisdictional rates.¹⁰

On November 16, 2020, PG&E filed a request for rehearing of FERC’s determination on this issue. PG&E will not be required to refund these amounts until the request for rehearing, and potentially any appeal, is resolved.¹¹ However, when FERC’s decision becomes final, PG&E may be required to refund a portion of the costs for these facilities to transmission customers through its FERC-jurisdictional TO Tariff and instead would seek to recover these costs through CPUC-jurisdictional rates. PG&E would use the updated TRRRMA to record these amounts now and then, if necessary, would later seek recovery in CPUC-jurisdictional rates by filing an application at the CPUC.

In addition to the impact in the TO18 proceeding, the outcome of the FERC decision regarding CGI plant costs was incorporated into FERC-approved settlements in PG&E’s nineteenth TO case (TO19 Proceeding)¹² and PG&E’s twentieth TO case (TO20 Proceeding).¹³ PG&E proposes to record CGI plant costs in the updated TRRRMA for these proceedings as well, pending a final decision in the TO18 proceeding. If a final FERC decision determines that these costs should not have been included in FERC-jurisdictional rates, PG&E will seek recovery of these costs in CPUC-jurisdictional rates through an application at the CPUC.

⁷ Opinion No. 572, P 182.

⁸ *Id.*, P 183.

⁹ *Id.*

¹⁰ *Id.*, P 203.

¹¹ The timing of a refund may also be dependent on further briefing of the return on equity issue in the TO18 proceeding. See Opinion No. 582, P 297.

¹² See *Pacific Gas and Electric Co.*, 165 FERC ¶ 61,244 (2018) (accepting settlement in TO19 Proceeding including a provision making the determination of CGI dependent on the outcome of the TO18 Proceeding). The TO19 Proceeding is FERC Docket No. ER17-2154-000.

¹³ See *Pacific Gas and Electric Co.*, 172 FERC ¶ 61,142 (2020) (accepting partial settlement in TO20 Proceeding including a provision making the determination of CGI dependent on the outcome of the TO18 Proceeding). The TO20 proceeding is FERC Docket No. ER19-13-000.

PG&E's Transmission Owner 20 Proceeding (FERC Docket ER19-13-000)

The CAISO maintains the “CAISO Register” to track the transmission facilities that have been turned over to the CAISO’s operational control.¹⁴ Under its TO Tariff, PG&E is able to recover in FERC-jurisdictional rates costs associated with facilities that are under the CAISO’s operational control (*i.e.*, listed on the CAISO Register).¹⁵ The CAISO’s Register is not static, but can change as the nature and use of facilities change, new facilities are added, or existing facilities are removed.

In a Partial Settlement approved by FERC in the TO20 Proceeding, PG&E agreed to conduct a reconciliation of its network transmission rate base records and the CAISO Register so that any changes to the CAISO Register would be properly reflected in the facilities included in PG&E’s FERC-jurisdictional rates.¹⁶ PG&E is currently conducting this reconciliation; the results will be reflected in a December 1, 2020 informational filing at FERC that will be used to establish PG&E’s FERC-jurisdictional rates starting January 1, 2021.¹⁷ Any facilities that are not currently on the CAISO Register will be removed from PG&E’s network transmission rate base and the costs associated with these facilities will not be recovered in FERC-jurisdictional rates. Alternatively, to the extent costs for facilities are currently being recovered in CPUC-jurisdictional rates but, based on this reconciliation, should be recovered in FERC-jurisdictional rates, these costs will be included in PG&E’s FERC-jurisdictional rates.

The Partial Settlement requires that this reconciliation be effective as of May 1, 2019, when PG&E’s TO20 rates went into effect. Because PG&E uses a Formula Rate at FERC that is based on prior year recorded data, it will take two annual rate cycles before the costs associated with the reconciliation are fully adjusted in FERC-jurisdictional rates. PG&E updates TO FERC-jurisdictional rates annually by submitting an informational filing to FERC on December 1st of each year for rates to go into effect on January 1st. FERC will frequently allow the new transmission rates to go into effect on January 1st without a decision. In addition to the timing associated with the annual rate cycles for a Formula Rate, parties may protest PG&E’s December 1, 2020 informational FERC filing, and ultimately FERC will decide which facilities should be funded through FERC-jurisdictional rates. PG&E would record both the debits and the credits related to these reconciliations

¹⁴ CAISO Tariff, § 7.5.1.1.

¹⁵ PG&E Transmission Owner Tariff, FERC Electric Tariff Volume No. 5, § 1 (available at: https://www.pge.com/pge_global/common/pdfs/about-pge/company-information/regulation/contracts-and-tariffs/transmission-owner-tariff.pdf) (TO Tariff).

¹⁶ See *Offer of Partial Settlement and Stipulation*, submitted in TO20 Proceeding on March 31, 2020 (Partial Settlement), § 6.6 and approved by FERC in *Pacific Gas and Electric Co.*, 172 FERC ¶ 61,142 (2020).

¹⁷ Partial Settlement, § 6.6.

as required by the Partial Settlement in the updated TRRRMA and would later seek recovery from or refund to customers in a CPUC application.

Updates to the CAISO Register

PG&E's TO Tariff, which is approved by FERC, provides that PG&E can recover costs in FERC-jurisdictional rates for facilities that are under the CAISO's operational control.¹⁸ As explained above, the facilities under the CAISO's operational control are listed in the CAISO Register. The CAISO periodically updates its register to add new facilities, remove facilities that are no longer in use, and update status of facilities that may have changed purpose or function and are no longer considered to be network transmission facilities. As PG&E can only recover costs in FERC-jurisdictional rates for facilities under CAISO's operational control, changes to the CAISO Register directly impact PG&E's ability to record and recover costs at FERC. PG&E would record the costs associated with changes to the list of facilities on the CAISO Register in the TRRRMA. For example, if as a result of a change in configuration the CAISO updated a facility in the CAISO Register because it was no longer considered a network transmission facility, the costs associated with this facility would be recorded in the TRRRMA until such time as these costs can be included in CPUC-jurisdictional rates.

PG&E's Proposed Updates to the TRRRMA Are Reasonable and Appropriate

PG&E proposes to modify the TRRRMA to delete references to specific FERC proceedings related to industry restructuring that have concluded and to accommodate the new Formula Rate mechanism where FERC may not issue a decision. The modifications proposed in this advice letter would allow the TRRRMA to be used for situations arising from ongoing and future FERC proceedings that address whether certain costs should be included in FERC-jurisdictional rates, such as the TO18 and TO20 proceedings described above. This would include proceedings where FERC issues a formal decision (e.g., the TO18 proceeding) or where FERC allows rates to go into effect through a Formula Rate mechanism without a decision (e.g., the TO20 proceeding). In addition, PG&E is proposing to add clarifying language that the TRRRMA can also include costs associated with facilities for which the CAISO no longer exercises control. This would include situations where the CAISO adds or removes facilities from the CAISO Register, as described above.

The TRRRMA is intended to allow for the tracking and recording of costs that are determined to be non-transmission-related costs so that these costs can be recovered in CPUC-jurisdictional rates.¹⁹ Under the TRRRMA, customers only pay once for the costs associated with a facility, avoiding any double-recovery, and PG&E receives the benefit of cost recovery in CPUC-jurisdictional rates if facilities are not transmission-related and

¹⁸ TO Tariff, § 1.

¹⁹ Resolution E-3574, Finding 12.

thus cannot be included in FERC-jurisdictional rates. Moreover, the TRRRMA provides that it “shall only include costs . . . not disallowed by FERC or the Commission.”

Although the TRRRMA was originally established to address the transition to CAISO control of facilities during industry restructuring, the three examples provided above (*i.e.*, TO18 proceeding, TO20 proceeding, and changes to the CAISO Register) demonstrate that the TRRRMA continues to be a useful and important mechanism to allow PG&E an opportunity to fully recover costs through the appropriate rates. The TRRRMA is the appropriate mechanism to track costs that are determined through a regulatory proceeding or revisions to the CAISO Register to be either FERC or CPUC jurisdictional to ensure that the costs are recovered through rates.

Finally, it is important to note that recording costs in the TRRRMA does not guarantee cost recovery in CPUC-jurisdictional rates. Instead, the TRRRMA only allows PG&E to record the costs. PG&E must still seek actual recovery of the costs through a CPUC application (*i.e.*, either the General Rate Case (GRC) or a separate application).

Proposed Tariff Revisions

PG&E is proposing revisions to the TRRRMA²⁰ to update the scope of the TRRRMA, specify the inclusion of an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense (RF&U), and provide clarifying language regarding the recovery of costs recorded in the TRRRMA:

1. Revising the Purpose section to remove reference to performance-based ratemaking, as this is no longer applicable to PG&E, and clarifying the language to allow for recording of costs associated with non-network transmission facilities. Updates allow for the recovery of facilities determined not to be eligible for inclusion in FERC-jurisdictional rates in CPUC jurisdictional rates, and for the recovery of costs that are determined to be eligible to be recovered in FERC-jurisdictional rates but which had been recovered in CPUC-jurisdictional rates in FERC-jurisdictional rates;
2. Adding Section 3 to make clear that costs recorded in the TRRRMA will be recovered through the GRC or a separate application;
3. Making clear in Section 5 that the TRRRMA includes RF&U accounts expense;
4. Deleting references in sections 5(a) and 5(b) to the FERC proceedings that were related to PG&E's initial TO Tariff rate cases following electric industry restructuring so that the TRRRMA is available for other FERC proceedings, such

²⁰ Paragraph references are to the red-line version of the TRRRMA attached to this Advice Letter.

as the TO18 and TO20 Proceedings described above, or for changes to the CAISO Register; and,

5. Adding new accounting procedure 5(c) to indicate that “a debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission.”

A redline version of the TRRRMA with PG&E’s proposed revisions is included as an Attachment to this Advice Letter.

This submittal will not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule. To the extent PG&E seeks to recover costs associated with amounts recorded in the TRRRMA, it will need to make this request in an application filed at the Commission.

Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 8, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

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

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

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

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

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

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

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

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, December 18, 2020 which is 30 calendar days after the date of submittal.

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. 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:

Attachment 1: Tariffs

Attachment 2: Redline Tariffs



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6007-E

Tier Designation: 2

Subject of AL: Modifications to Electric Transmission Revenue Requirement Reclassification Memorandum Account –
Electric Preliminary Statement Part BK

Keywords (choose from CPUC listing): Memorandum Account, Preliminary Statement

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

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

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

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

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a
nondisclosure agreement. Name and contact information to request nondisclosure agreement/
access to confidential information:

Resolution required? ☐ Yes ☒ No

Requested effective date: 12/18/20

No. of tariff sheets: 3

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: See Attachment 1

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
47878-E	ELECTRIC PRELIMINARY STATEMENT PART BK TRANSMISSION REVENUE REQUIREMENT RECLASSIFICATION MEMO ACCOUNT Sheet 1	16761-E
47879-E	ELECTRIC TABLE OF CONTENTS Sheet 1	47781-E
47880-E	ELECTRIC TABLE OF CONTENTS Sheet 12	40534-E



**ELECTRIC PRELIMINARY STATEMENT PART BK
TRANSMISSION REVENUE REQUIREMENT
RECLASSIFICATION MEMO ACCOUNT**

Sheet 1

BK. TRANSMISSION REVENUE REQUIREMENT RECLASSIFICATION MEMORANDUM ACCOUNT (TRRRMA)

1. **PURPOSE:** The purpose of the TRRRMA is to: 1) record the revenue requirement associated with costs requested by PG&E for recovery in transmission rates that are no longer deemed to be network transmission-related costs and, as such, are not allowed to be included in Federal Energy Regulatory Commission (FERC)-jurisdictional transmission rates, and 2) record, as a credit to the TRRRMA, any revenue requirement associated with costs already included by the California Public Utilities Commission (Commission) in electric distribution rates, but later included in FERC-jurisdictional transmission rates. The TRRRMA shall only include costs not disallowed by FERC or the Commission. Amounts tracked in the TRRRMA will be considered in a future Commission proceeding to determine the appropriateness of including these costs and credits in electric distribution rates. (T)
2. **APPLICABILITY:** The TRRRMA shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balances in the account will be addressed in a future General Rate Case (GRC) proceeding or other proceeding. (N)
4. **TRRRMA RATES:** The TRRRMA does not currently have a rate component. (T)
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the TRRRMA by making entries at the end of each month, or as applicable, as follows, including the allowance for Revenue Fees and Uncollectible (RF&U) accounts expense: (T)
 - a. A debit entry equal to any expense and/or capital-related revenue requirement that FERC determines should not be included in FERC-jurisdictional transmission rates, including facilities where the California Independent System Operator Corporation no longer exercises operational control or are removed from PG&E's Formula Rate. (T)
 - b. A credit entry equal to any revenue requirement already included in non-transmission rates by the Commission but are later included in FERC-jurisdictional rates and therefore, should not be collected in the CPUC-jurisdictional electric distribution rates. (T)
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and (N)
 - d. A debit or credit entry equal to the interest on the average of the balance at the beginning of the month and the balance after entries 4.a. and 4.b., at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, G.13 or its successor. (T)



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page.....		47879-E	(T)
Rate Schedules.....	47610,47611,47612,47613,47614,47615,47616,44177,47617-E		
Preliminary Statements.....	47618, 47880 ,47636,41723,47619,44724,47637-E		(T)
Rules.....	47720,47721,47782-E		
Maps, Contracts and Deviations.....	37960-E		
Sample Forms.....	47207,37631,47208,47620, 37632,47210, 47211,47621,47213,47622,47214,36059-E		

(Continued)

Advice 6007-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

November 18, 2020



ELECTRIC TABLE OF CONTENTS

Sheet 12

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
	Preliminary Statements (Cont'd)	
Part BB	Competition Transition Charge Responsibility for All Customers and CTC Procedure for Departing Loads 24070,19906,19907,16400,14960,14961, 16229,16230, 16231,24071,14964,14965,14966,14967,14968-14969,16401,16402-E	
Part BK	Transmission Revenue Requirement Reclassification Memorandum Account.....	47878-E (T)
Part BU	Vegetation Management Balancing Account.....	33880,40523-E
Part BY	Self-Generation Program Memorandum Account.....	26209-E

(Continued)

Advice 6007-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

November 18, 2020

Attachment 2

Redline Tariffs



**ELECTRIC PRELIMINARY STATEMENT PART BK
TRANSMISSION REVENUE REQUIREMENT
RECLASSIFICATION MEMO ACCOUNT**

Sheet 1

BK. TRANSMISSION REVENUE REQUIREMENT RECLASSIFICATION MEMORANDUM ACCOUNT (TRRRMA)

1. **PURPOSE:** The purpose of the TRRRMA is to: 1) record the revenue requirement associated with costs requested by PG&E for recovery in transmission rates that ~~the Federal Energy Regulatory Commission (FERC) later are no longer~~ deemed to be ~~non-network~~ transmission-related costs and, as such, ~~does are~~ not allowed to be included in ~~Federal Energy Regulatory Commission (FERC)-jurisdictional~~ transmission rates, and 2) record, as a credit to the TRRRMA, any revenue requirement associated with costs already included ~~in non-transmission~~ by the California Public Utilities Commission (Commission) ~~in General Rate Case (GRC) electric distribution rates~~, but later included ~~by FERC in FERC-jurisdictional network~~ transmission rates. The TRRRMA shall only include costs ~~categorized by FERC to be 1) non-network transmission and 2) only costs~~ not disallowed by FERC or the Commission. ~~The TRRRMA shall not include costs not eligible for recovery in the General Rate Case proceeding or Performance Based Ratemaking proceeding.~~ Amounts tracked in the TRRRMA will be considered in a future Commission proceeding to determine the appropriateness of including these costs and credits in ~~non-transmission electric distribution~~ rates.
2. **APPLICABILITY:** The TRRRMA shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATE:** ~~Disposition of the balances in the account will be addressed in a future general rate case (General Rate Case (GRC)) proceeding, or other application or proceeding.~~
- 4.3. **TRRRMA RATES:** The TRRRMA does not currently have a rate component.
54. **ACCOUNTING PROCEDURE:** PG&E shall maintain the TRRRMA by making entries at the end of each month, ~~or as applicable~~, as follows, ~~including the allowance for Revenue Fees and Uncollectible (RF&U) accounts expense:~~
 - a. A debit entry equal to any expense, and/or capital-related revenue requirement ~~in Docket Nos. ER97-2358-000, ER98-2351-000, ER99-2326-000 and ER99-4323-000~~ that FERC determines ~~in a final decision to be or defines as no longer non-network transmission related and not allowed should not be included in FERC-jurisdictional~~ transmission rates, ~~including facilities where the California Independent System Operator Corporation no longer exercises operational control or are removed from PG&E's Formula Rate.~~
 - b. A credit entry equal to any revenue requirement ~~in Docket Nos. ER97-2358-000, ER98-2351-000, ER99-2326-000 and ER99-4323-000~~ already included in non-transmission rates by the Commission but ~~are~~ later included ~~by FERC in network transmission in FERC-jurisdictional~~ rates and therefore, should not be collected in the ~~non-transmission GRC revenue requirement CPUC-jurisdictional electric distribution rates.~~
 - c. ~~A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and~~
 - ed. A debit or credit entry equal to the interest on the average of the balance at the beginning of the month and the balance after entries 4.a. and 4.b., at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, G.13 or its successor.

~~PG&E shall request recovery of the balance in the TRRRMA in the annual Revenue Adjustment Proceeding (RAP), or other proceeding expressly authorized by the Commission.~~

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

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