

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6021E
As of January 6, 2021

Subject: Update to Pacific Gas and Electric Company's Bundled Procurement Plan Procurement Processes and Methods (Appendix B); Brokerages and Exchanges Listing (Appendix J)

Division Assigned: Energy

Date Filed: 12-08-2020

Date to Calendar: 12-11-2020

Authorizing Documents: D0712052

Disposition:	Accepted
Effective Date:	01-07-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

951-965-8905

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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

December 8, 2020

Advice 6021-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Update to Pacific Gas and Electric Company's Bundled Procurement Plan – Procurement Processes and Methods (Appendix B); Brokerages and Exchanges Listing (Appendix J)

Purpose

Pacific Gas and Electric Company (PG&E) requests California Public Utilities Commission (CPUC or Commission) approval to update (1) Appendix B (Procurement Processes and Methods) of its Bundled Procurement Plan¹ (BPP) with clarifying edits to Section B.1.d (Electronic Solicitations) and Table B-1 (Procurement Processes and Methods) Item #10 and (2) Appendix J (Brokerages and Exchanges) of its BPP to add two new brokerages: GA Global Markets, LLC and GFI Securities, LLC.

Background

In accordance with Decision (D.) 07-12-052, all proposed updates to the BPP are to be made via an advice letter and shall include red-lined pages of the BPP as well as clean replacement pages.² Below, PG&E describes the updates to Appendix B and J in the BPP, and is including Attachments A and B to reflect the relevant changes. Attachment A is the red-lined version of the changes and Attachment B is the clean version of the changes.

¹ In D.15-10-031, the Commission adopted PG&E's proposed 2014 BPP with modifications, and required PG&E to conform the BPP to incorporate modifications made in the Decision no later than 90 days of the Decision. PG&E filed its conformed BPP on December 10, 2015 via Advice Letter 4750-E, which was approved via Energy Division disposition letter on June 15, 2016.

² D.07-12-052 at pp. 184-185.

Request

Appendix B

On October 3, 2014, PG&E filed its Proposed 2014 Bundled Procurement Plan.³ In it, PG&E requested clarification regarding language in Appendix B, Procurement Processes and Methods, of the 2010 BPP as it related to the use of electronic solicitations.⁴ Specifically, Item #10 in Table B-1 of Appendix B of the 2010 BPP included a limitation stating that electronic solicitations were approved only for “non-utility-owned” resources.” The Proposed 2014 BPP Filing explicitly requested clarification of Item #10 in Table B-1 of Appendix B, as follows: “Specifically, PG&E seeks clarification that the limitation stating that electronic solicitations are approved only for ‘non-utility-owned resources’ is not intended to bar transactions with PG&E’s California Gas Transmission for natural gas storage products. The limitation on utility-owned-resources (in D.12-01-033, for example), clearly referred to ‘bids related to the development of utility-owned generation.’”⁵ To effectuate the clarification, PG&E requested approval of an addition to Appendix B, Table B-1 Item #10 that reads as follows: “Electronic Solicitations are an approved procurement method for gas storage products, including solicitations involving PG&E California Gas Transmission, subject to all other Procurement Review Group (“PRG”) review and Independent Evaluator (“IE”) requirements.”⁶ In D.15-10-031, the Commission adopted PG&E’s proposed 2014 BPP (with modifications), including PG&E’s clarifying language in Item #10 of Table B-1, and required PG&E to conform the BPP to incorporate modifications unrelated to the clarifying language in Item #10 of Table B-1 no later than 90 days after the effective date of the Decision. PG&E filed its conformed BPP on December 10, 2015 via Advice Letter 4750-E, which was approved by Energy Division disposition letter on June 15, 2016. Thus, the approved 2014 BPP includes the clarification requested by PG&E in Item #10 of Table B-1 in Appendix B, and PG&E is permitted to utilize electronic solicitations for gas storage products, including solicitations involving PG&E California Gas Transmission, subject to all other PRG review and IE requirements.

Recently, PG&E discovered that the narrative in Section B.1.d (Electronic Solicitations) of Appendix B and another sentence in Item #10 of Table B-1 also include language that could be erroneously interpreted to suggest that electronic solicitations are not permitted for gas storage products. The language would benefit from minor updates that clarify that PG&E is not barred from utilizing electronic solicitations for transactions with PG&E’s California Gas Transmission for natural gas storage products, subject to all other PRG review and IE requirements. Thus, in an effort to make consistent the

³ Rulemaking 13-12-010, *Pacific Gas and Electric Company’s (U 39 E) Proposed 2014 Bundled Procurement Plan*, dated October 3, 2014 (“Proposed 2014 BPP Filing”).

⁴ *Id.* p. 21.

⁵ *Ibid.*

⁶ *Id.*, Appendix B, page B-1; Appendix C, page Cal P.U.C. Sheet No. 56.

statements related to electronic solicitations in Section B.1.d and Item #10 of Table B-1 of Appendix B, PG&E requests the minor changes shown in Attachment A hereto in Section B.1.d and Item #10 of Table B-1. These proposed updates are consistent with the clarification approved in D.15-10-031 that is described above and should be approved.

Appendix J

In an effort to provide additional procurement options, PG&E requests to add the following brokerages to its existing list of Commission-approved brokerages in Appendix J:

- GA Global Markets, LLC
- GFI Securities, LLC

Authorizing these additions to PG&E's list of approved brokerages does not obligate PG&E to use them. Instead, adding these brokerages will simply provide PG&E an option to use these brokers. The decision to use these or any approved brokerages will be made on a transaction-by-transaction basis consistent with the authority provided under PG&E's Commission-approved BPP. PG&E has routinely updated its list of brokerages and exchanges in order to add potential new counterparties for transactions that are consistent with PG&E's BPP.

Attachments

Attachment A Redline Version, Appendix B (Sheets 51, 57), Appendix J (Sheet 158)

Attachment B Clean Version, Appendix B (Sheets 51, 57), Appendix J (Sheet 158)

Protests

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

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 28, 2020, which is 20 days after the date of this filing. 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
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-7226
E-mail: PGETariffs@pge.com

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

Effective Date

PG&E requests that this Tier 2 advice letter⁷ become effective on regular notice, January 7, 2021, which is 30 calendar days after the date of filing.

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

⁷ Consistent with Advice Letters 4796-E, 4866-E and 5885-E, PG&E is submitting updates to its Commission-approved Brokerages and Exchanges via Tier 2 advice letter.

on the service list for R.20-05-003. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.20-05-003



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 U 39 E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Stuart Rubio

Phone #: 951-965-8905

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) #: 6021-E

Tier Designation: 2

Subject of AL: Update to Pacific Gas and Electric Company's Bundled Procurement Plan – Procurement Processes and Methods (Appendix B); Brokerages and Exchanges Listing (Appendix J)

Keywords (choose from CPUC listing): Compliance, Procurement

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.07-12-052

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: N/A

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: 1/7/21

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

Clear Form

Attachment A

**Redline Version, Appendix B (Sheets 51, 57),
Appendix J (Sheet 158)**



procured this backstop capacity at an administratively set price. Starting on March 1, 2016, the CAISO will procure this capacity through an annual, monthly, and daily competitive solicitation process (“CSP”). From the CSP, the CAISO will select the least cost resource that is capable of resolving the system reliability need. The CSP design was developed through a settlement process to which the Commission was a signatory and was approved by the Federal Energy Regulatory Commission (“FERC”) on October 1, 2015.

d. Electronic Solicitations

Electronic solicitations facilitate the competitive purchase or sale of commodity products and are defined as any competitive process where products are requested from the market. PG&E may participate in or administer as either a buyer or seller an electronic solicitation that does not involve utility-owned generation resources. In an electronic solicitation, the buyer or seller may post a product for purchase or sale through a variety of electronic platforms. These platforms may include but are not limited to: a secure internet site, an instant message communication, email, or via a voice solicitation to participants. Participants compete in a competitive process to provide the buyer or seller with the most advantageous price. Both sealed bid and live, open outcry solicitations are considered a competitive process. Bidders are required to meet the buyer or organizer’s credit qualifications in order to participate. Selection is made by product availability and price.



TABLE B-1
PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT PROCESSES AND METHODS
(CONTINUED)

Item #	Transaction Process	Description	Initial Authorization
8	Non-RPS-eligible Utility Ownership of Generation	Utility ownership of generation can be pursued outside of an RFO process under certain conditions (see D.07-12-052 at 209-213; D.08-11-008 at 20-23 and D.12-04-046 at pp. 28-39).	D.07-12-052 D.08-11-008 D.12-04-046
9	Open Access Same-Time Information Systems	Procure standard electric transmission products from transmission providers throughout the Western Electric Coordinating Council region at the Federal Energy Regulatory Commission tariffed rates and voice and on-line brokers.	D.03-12-062 D.04-12-048 AL 2615-E
10	Electronic Solicitations	IOUs are authorized to conduct purchase or sale through an electronic solicitation format for non-utility-owned <u>generation</u> resources requested from the market. Electronic Solicitations are an approved procurement method for gas storage products, including solicitations involving PG&E California Gas Transmission, subject to all other Procurement Review Group ("PRG") review and Independent Evaluator ("IE") requirements.	D.03-12-062 D.04-12-048 AL 2615-E D.12-01-033
11	Market RFP	IOUs can bid in open seasons or RFPs held by generator owners, LSEs and other market participants. Such requests may also be called Requests for Bids or RFOs.	D.04-01-050 AL 2615-E D.12-01-033
12	CAISO Allocations and Auctions	CAISO allocation and auctions for LT-Congestion Revenue Rights ("CRR") and CRRs and allocation of RA counting rights.	AL 3095-E AL 3106-E D.06-07-029 AL 2897-E
13	CARB Auction	Authorization to procure GHG Allowances through any CARB Auction in accordance with the Cap-and-Trade regulation.	D.12-04-046
14	Allowance Price Containment Reserve	Authorization to procure GHG Allowances through CARB's Allowance Price Containment Reserve.	D.12-04-046
15	Cashout	As a result of certain pipeline imbalances, gas pipeline users may be cashed out according to the pipeline's tariff rules. The result is a commodity transaction, with the pipeline having bought or sold gas to or from the customer. The pipeline's tariffs include the price formula or methodology, but the actual volume and price may not be known until after the transaction is complete.	D.15-10-031
16	Bilateral transactions for the standard products gas storage and pipeline capacity	Where there are five or fewer counterparties in the relevant market, bilateral transactions for gas storage and gas pipeline transactions are authorized.	D.03-12-062
17	Direct Bilateral contracting with counterparties for Local Reliability	Authorization to take appropriate actions to reduce overall costs and increase local area reliability by contracting for capacity and energy from power plants when the purpose is to enhance local area reliability.	D. 04-07-028



A. Brokerages¹

- Amerex Brokers, LLC
- BGC Environmental Brokerage Services, L.P.
- BGC Financial, L.P.
- Bluesource Energy, LLC (WMDVBE)
- Classic Energy LLC
- EOX Holdings, LLC
- Equus Energy Group, LLC
- Evolution Markets, Inc.
- GA Global Markets, LLC
- GFI Securities, LLC
- ICAP United, Inc.
- ICAP Energy LLC
- INTL FCStone Financial, Inc.
- Karbone, Inc.
- Landmark
- TFS Energy Futures, LLC
- Tullett Prebon Americas Corp.

¹ Including any subsidiaries, if applicable. PG&E will provide its Procurement Review Group (PRG) a list of subsidiaries on an annual basis.

Attachment B

**Clean Version, Appendix B (Sheets 51, 57),
Appendix J (Sheet 158)**



procured this backstop capacity at an administratively set price. Starting on March 1, 2016, the CAISO will procure this capacity through an annual, monthly, and daily competitive solicitation process (“CSP”). From the CSP, the CAISO will select the least cost resource that is capable of resolving the system reliability need. The CSP design was developed through a settlement process to which the Commission was a signatory and was approved by the Federal Energy Regulatory Commission (“FERC”) on October 1, 2015.

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Electronic solicitations facilitate the competitive purchase or sale of commodity products and are defined as any competitive process where products are requested from the market. PG&E may participate in or administer as either a buyer or seller an electronic solicitation that does not involve utility-owned generation resources. In an electronic solicitation, the buyer or seller may post a product for purchase or sale through a variety of electronic platforms. These platforms may include but are not limited to: a secure internet site, an instant message communication, email, or via a voice solicitation to participants. Participants compete in a competitive process to provide the buyer or seller with the most advantageous price. Both sealed bid and live, open outcry solicitations are considered a competitive process. Bidders are required to meet the buyer or organizer’s credit qualifications in order to participate. Selection is made by product availability and price.



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16	Bilateral transactions for the standard products gas storage and pipeline capacity	Where there are five or fewer counterparties in the relevant market, bilateral transactions for gas storage and gas pipeline transactions are authorized.	D.03-12-062
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A. Brokerages¹

- Amerex Brokers, LLC
- BGC Environmental Brokerage Services, L.P.
- BGC Financial, L.P.
- Bluesource Energy, LLC (WMDVBE)
- Classic Energy LLC
- EOX Holdings, LLC
- Equus Energy Group, LLC
- Evolution Markets, Inc.
- GA Global Markets, LLC
- GFI Securities, LLC
- ICAP United, Inc.
- ICAP Energy LLC
- INTL FCStone Financial, Inc.
- Karbone, Inc.
- Landmark
- TFS Energy Futures, LLC
- Tullett Prebon Americas Corp.

¹ Including any subsidiaries, if applicable. PG&E will provide its Procurement Review Group (PRG) a list of subsidiaries on an annual basis.

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

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

California Hub for Energy Efficiency
Financing

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

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

Chevron Pipeline and Power
City of Palo Alto

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

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

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

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

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

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

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

Pioneer Community Energy

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

SPURR
San Francisco Water Power and Sewer
Semptra 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