

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



October 5, 2021

Advice Letter 6069-E, 6069-E-A

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

SUBJECT: Procurement Transaction Quarterly Compliance Submittal (Q4, 2020).

Dear Mr. Jacobson:

Advice Letter 6069-E, 6069-E-A is effective as of October 08, 2021.

Sincerely,

A handwritten signature in dark ink that reads "Edward Randolph".

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

February 1, 2021

Advice 6069-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Procurement Transaction Quarterly Compliance Submittal (Q4, 2020)

Purpose

Pacific Gas and Electric Company ("PG&E") hereby submits to the California Public Utilities Commission ("Commission" or "CPUC") its compliance submittal for Q4 2020 in conformance with PG&E's 2014 BPP approved in D.15-10-031. PG&E's submittal of this Procurement Transaction Quarterly Compliance Report ("QCR") for record period October 1, 2020 through December 31, 2020, (Q4, 2020) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports be submitted within 30 days of the end of the quarter.

Background

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

Compliance Items

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

Attachment A: Q4 2020 Electric and Natural Gas Transactions
Attachment B: Q4 2020 Counterparty Information
Attachment C: Q4 2020 Electric Transactions Summary
Attachment D: Q4 2020 Natural Gas Transactions Summary

Attachment E: Q4 2020 Other Transactions
Attachment F: Q4 2020 Key Briefing Packages
Attachment G: Q4 2020 Independent Evaluator (IE) Reports
Attachment H: Q4 2020 Contracts Executed/Contracts Amended
Attachment I: Q4 2020 Summary of Retained Generation Investments Completed
Attachment J: System Load Requirements/Conditions
Attachment K: Risk Management Strategy Communication and Management Disclosure
Attachment L: Reasonable Number of Analyses Models, Description of Models, and How Models Operate
Attachment M: Q4 2020 Transactions Subject to Strong Showing

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

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

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

Protests

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

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than February 22, 2021, which is 21 days¹ 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.

¹ The 20-day protest period concludes on a weekend; therefore, PG&E is moving this date to the following business day.

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

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

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

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

Effective Date

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is March 3, 2021, which is 30 days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter excluding the confidential appendices is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for R.16-02-007. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

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

Public Attachments:

Attachment 1: Narrative

Attachment 2: Attachment G-1 (Public Version)

Attachment 3: Attachment G-2 (Public Version)

Attachment 4: Attachment H (Public Version)

Attachment 5: Confidentiality Declarations and Matrix



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

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

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6069-E

Tier Designation: 2

Subject of AL: Procurement Transaction Quarterly Compliance Submittal (Q4, 2020)

Keywords (choose from CPUC listing): Compliance, Procurement

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.03-12-062 and D.02-10-062

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

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

Confidential treatment requested? ☒ Yes ☐ No

If yes, specification of confidential information: See Confidentiality Declarations and Matrix
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Jay Bukowski (415) 973-1727, John Ulloa (415) 973-0535

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

Requested effective date: 3/3/21

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

Advice 6069-E
February 1, 2021

Attachment 1

Narrative

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

February 1, 2021

TABLE OF CONTENTS

A. Introduction.....	1
B. Summary	1
1. Competitive Solicitations (Approval Through the QCR)	1
2. Other Competitive Solicitations (Approval Through Separate Advice Filing or Regulatory Process)	2
3. Other Procurement Activities (Approval Through the QCR).....	2
a) Electric Transactions.....	2
b) Gas Transactions.....	3
4. Other Procurement Activities (Approval Through Separate Advice Filing or Regulatory Process)	3
5. Other Procurement Activities, Approval Through the 2020 Energy Resource Recovery Account (ERRA) Compliance Proceeding	3
C. Master Data Request (MDR) Documentation.....	3
1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.....	4
2. The briefing package provided to the ultimate decision maker.	4
3. Description of and justification for the procurement processes used to select the transactions.....	4
a) Electric Procurement – Description	4
b) Electric Procurement – Justification	5
c) Natural Gas Procurement – Description	7
d) Natural Gas Procurement – Justification	8
e) GHG and Other Commodities	10
4. Explanation/justification of the timing of the transactions.	11
a) Electric Transactions.....	11
b) Natural Gas Transactions.....	11
5. Discussion of the system load requirements/conditions underlying the need for the Quarter’s transactions.	11
a) PG&E Participation in the CAISO Markets	11
b) PG&E-Owned Generation Conditions During Q4 2020	12
6. Discussion of how the Quarter’s transactions meet the goals of the risk management strategy reflected in the Plan.	13
7. Copy of each contract.	14
8. The valuation results for the contract(s) (for contracts of three months or greater duration).	14
9. An electronic copy of any data or forecasts used to analyze the transactions.	14

TABLE OF CONTENTS
(CONTINUED)

10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.	14
11. Any other information sought by the Commission under the Pub. Util. Code.	14
D. Additional Reporting Requirement Pursuant to D.07-01-039	15
E. Cost Allocation Mechanism (CAM).....	15

Summary of Public Attachments

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

Summary of Confidential Attachments

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

Summary of Confidential Attachments
(Continued)

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

A. Introduction

As required by Ordering Paragraph (OP) 8 of Decision (D.) 02-10-062, and clarified in D.03-06-076, D.03-12-062, D.04-07-028, D.04-12-048 and D.07-12-052, Pacific Gas and Electric Company (PG&E) hereby provides its report demonstrating that its procurement-related transactions during the period October 1, 2020 through December 31, 2020 (Quarter), were in compliance with PG&E's Bundled Procurement Plan (BPP or Plan) approved by the California Public Utilities Commission (CPUC or Commission) in D.15-10-031. Any material related to PG&E's activities on behalf of the Central Procurement Entity (CPE) will not be included in the Quarterly Compliance Report (QCR), it will be filed with the requisite Compliance Filing.

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

- Advice Letter (AL) 5985-E: Request to Extend Procurement Authority Pursuant to PG&E's Assembly Bill (AB) 57 BPP, submitted October 29, 2020.
- AL5968-E: Update to Sales (Appendix S), submitted October 5, 2020 was approved on November 3, 2020.
- AL 6021-E: Updates to Procurement Processes and Methods (Appendix B); and Brokerages and Exchanges (Appendix J), submitted December 8, 2020.
- AL 6024-E: Notification of PG&E's BPP, Implementation of its Electric Portfolio Hedging Plan, submitted December 11, 2020.
- AL 5930-E: Update to Carbon Free Energy (Appendix P), submitted August 27, 2020 was approved on December 17, 2020.
- AL 6029-E: Update to Greenhouse Gas (GHG) Procurement Limits (Appendix C), submitted December 21, 2020.

B. Summary

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

1. Competitive Solicitations (Approval Through the QCR)

- a. None for the Quarter.

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

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

- a. Bioenergy Market Adjusting Tariff (bi-monthly auctions), ongoing
- b. Renewable Market Adjusting Tariff (ReMAT) (bi-monthly auctions)¹
- c. Winter Regional Renewable Choice Request for Offers (RFO) (aka Enhanced Community Renewables (ECR)) (issued November 13, 2018)
- d. Fall 2020 Regional Renewable Choice (aka ECR) (issued October 15, 2020)
- e. Solar in Disadvantaged Communities Solicitation (issued October 15, 2020)
- f. 2020 Tree Mortality Non-Bypassable Bundled Renewable Portfolio Standard (RPS) Energy Sale (issued November 6, 2020)
- g. Winter 2020 Bundled RPS Energy Renewable Energy Credit/Certificates (REC) Solicitation (issued December 15, 2020)
- h. PG&E Summer 2021/2022 Capacity Procurement (issued December 29, 2020)

3. Other Procurement Activities (Approval Through the QCR)

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

a) Electric Transactions

- i. *California Independent System Operator (CAISO) Allocations*
 - a. CAISO Monthly Congestion Revenue Rights (CRR) Allocation Processes
 - CAISO 2021 Annual CRR Tier 2, Tier 3 and Long-Term Tier Allocation Processes
- ii. *CAISO Markets and Processes*
 - a. Convergence Bidding
- iii. *Direct Bilateral Contracting for Short-Term Products*
- iv. *Bilateral Negotiated Contracts*
- v. *Electronic Solicitations issued by PG&E*
- vi. *Market Request for Proposal (RFP)*
- vii. *Transparent Exchange*

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

b) Gas Transactions

- i. Transparent Exchanges*
- ii. Direct Bilateral Contracting for Short-Term Products*
- iii. Voice Brokers*
- iv. Electronic Solicitations*
- v. Cashouts*

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

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

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

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

5. Other Procurement Activities, Approval Through the 2020 Energy Resource Recovery Account (ERRA) Compliance Proceeding

During the Quarter, PG&E participated in a Market RFP issued by another market participant that resulted in sale transactions.

- PG&E executed these sales transactions in an effort to meet its local Resource Adequacy (RA) compliance obligations for the 2021 Annual Compliance Filing. PG&E's BPP Appendix S provides that PG&E will only engage RA sales transactions pursuant to its own solicitations. These transactions are detailed in Confidential Attachment H (information only). PG&E will submit these transactions with its 2020 ERRA Compliance application for review and approval.

C. Master Data Request (MDR) Documentation

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

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

All procurement-related activity during the Quarter was approved and executed either by, or under the direction of, Fong Wan, Senior Vice President, Energy Policy and Procurement; Martin Wyspianski, Senior Director, Electric and Gas Acquisition; Gillian Clegg, Senior Director, Energy Portfolio Procurement and Policy; Don Howerton, Director, Structured Energy Transactions; Scott Ranzal, Director, Portfolio Management; Chris McNeece, Director, Short-Term Electric Supply; and/or John Ulloa, Manager, Electric Gas Supply consistent with the delegation of authority effective for the period.

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

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

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

a) Electric Procurement – Description

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

- Competitive Solicitations;
- CAISO Allocations;
- CAISO Markets and Process;
- Direct Bilateral Contracting for Short-Term Products;

- Bilateral Negotiated Contracts;
- Electronic Solicitations issued by PG&E;
- Market RFP;
- E-Solicitation, Transparent Exchanges, Voice and On-Line Brokers;
- QF/Combined Heat and Power (CHP) Amendments Executed under the CHP Settlement *(for informational purposes only); and*
- Pro forma contracts executed under the CHP Feed-In Tariffs Program *(for informational purposes only).*

b) Electric Procurement – Justification

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

None for the Quarter.

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

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

- CAISO Allocations

CAISO Monthly CRR Allocation Process

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

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

In October 2020, November 2020, and December 2020, PG&E participated in the CAISO's monthly CRR allocation processes to procure CRRs for November 2020, December 2020, and January 2021, respectively.

- CAISO 2021 Annual CRR Allocation Process

PG&E participated in the 2021 Tier 2, and Tier 3, and Long-Term Allocation Processes for the quarter. Awards from Tier 2 were posted on October 12, and Tier 3 were posted on October 23, 2020. Combined

results from the Tier 1, Tier 2, Tier 3 and Long-Term Allocation Processes are included in this QCR.

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

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

- CAISO Markets and Processes

- Convergence Bidding

- PG&E suspended Convergence Bidding activities after trade day May 26, 2018. As of December 31, 2020, all Convergence Bidding activities remain suspended. Relevant information is included in Confidential Attachment E, F and J.

- Direct Bilateral Contracting for Short-Term Products

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

- Bilateral Negotiated Contracts

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

- Electronic Solicitations issued by PG&E

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

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

- There were three E-Solicitations for RA and Import Energy transactions in the quarter. Two were monitored by an IE: (1) PG&E 2020 Multi-Year RA Solicitation Phase 2, and (2) PG&E RA and Import Energy E-Solicitation, (a.k.a. 2021 Balance of Year). Relevant information is included in Confidential Attachment G.

- Market RFP – During the Quarter, PG&E participated in Southern California Edison Company’s Market RFP and executed Local RA purchase transactions. Relevant information is included in Confidential Attachments E, F, and H.
- E-Solicitation, Transparent Exchange, or Voice and On-Line Brokers – During the Quarter, PG&E did not execute electric financial transactions via E-Solicitation or Transparent Exchange (including voice and on-line brokers). Relevant information is included in Confidential Attachments A and L.
- QF/CHP Legacy Contracts (for informational purposes only)

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

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

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

c) Natural Gas Procurement – Description

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

- Competitive Solicitations;
- Transparent Exchanges;

- Direct Bilateral Contracting for Short-Term Products;
- Voice and On-Line Brokers;
- Electronic Solicitations; and
- Cashouts.

d) *Natural Gas Procurement – Justification*

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

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

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

- Transparent Exchanges: Electronic trading exchanges for transparent prices:

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

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

Gas Financial Transactions are cleared through exchanges (ICE or the New York Mercantile Exchange (NYMEX)). ICE and NYMEX provide access to anonymous bids and offers establishing both a liquid and robust market for financial products, and a benchmark for over-the-counter products. These products include Henry Hub futures and options, and basis futures against the industry benchmark indices, including Gas Daily, Natural Gas Intelligence (NGI) and Inside Federal Energy Regulatory Commission (FERC) Gas Market Report. Details demonstrating PG&E’s compliance with D.15-10-031 during the QCR period are included in Confidential Attachments J and L. Relevant information executed during the QCR period is included in Confidential Attachment A.

- Direct Bilateral Contracting for Short-Term Products

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

- Voice and On-Line Brokers – Gas Financial Transactions

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

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

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

- Electronic Solicitations

Conducted via Instant Messaging and Telephone – PG&E conducts electronic solicitations for the purchase or sale of physical gas supply, with delivery terms ranging from a single day, to one month or longer, using instant messaging and telephone. In this way, PG&E is able to obtain robust price quotes from the marketplace, in real time, and may then execute with the counterparty with the best bid(s) or offer(s). Relevant information of transactions executed via electronic solicitation during the QCR period is included in Confidential Attachment A.

PG&E conducted an electronic solicitation for natural gas storage products in November. Prior to issuing the solicitation, PG&E issued a Notice of Intent to all storage providers connected to the PG&E natural gas system. Relevant information is included in Confidential Attachments A, E, F, H, and L.

- Cashouts: Commodity Purchases/Sales

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

e) GHG and Other Commodities

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

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

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

- PG&E received its annual allocation of Electric Distribution Utility (EDU) Current Vintage allowances for the 2020 year from the California Air Resources Board (CARB) in October 2019. All of the EDU allowances were consigned into the 2020 CARB Auctions as required by the regulations and consistent with PG&E's BPP. CARB and Québec's ministère du Développement durable, de l'Environnement et de la Lutte contre les changements climatiques held a joint allowance auction on November 17, 2020, for Current 2015, 2017, 2018, 2020 Vintages and Advance 2023 Vintage allowances.
- PG&E is authorized to procure GHG products through CARB Auctions and other CPUC-approved procurement processes and methods. PG&E provided information regarding its bilateral market procurement strategy to the PRG.
- PG&E's procurement during the Quarter was consistent with PG&E's Conformed BPP GHG Procurement Plan filed in AL 5579-E, effective July 1, 2019.

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

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

a) Electric Transactions

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

b) Natural Gas Transactions

For daily physical gas transactions, timing of execution is primarily driven by the requirement to match fuel usage by utility-owned and contracted electric generating units and supply delivered on a daily and monthly basis, and by the availability of information impacting expectations for daily dispatch of these units. For transactions one month or longer, PG&E typically fills its forecast short gas positions in month-ahead, seasonal, or annual blocks, depending on the liquidity and prices available in each of these markets. Execution of term transactions was based on the PG&E Electric Portfolio Quarterly Position Update, presented to the PRG on September 15, 2020. Documentation supporting the timing of transactions is included in Confidential Attachment J.

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

a) PG&E Participation in the CAISO Markets

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

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

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

b) PG&E-Owned Generation Conditions During Q4 2020

PG&E received 42 percent of normal rainfall during the Quarter.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as system conditions and economics allowed. There were three planned outages including: Helms Unit 1 (404 MW), Helms Unit 2 (404 MW), and Helms Unit 3 (404 MW). These outages were for generator work and tunnel repairs and will continue into the first Quarter of 2021. There were no maintenance outages at Helms during the Quarter lasting longer than 72 hours. Additionally, there were no forced outage events at Helms longer 24 hours during the Quarter.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Bucks Creek Units 1 and Unit 2 (55 MW total), Caribou 2 Unit 4 and Unit 5 (120 MW total), Cresta Unit 1 and Unit 2 (70 MW, total), Drum 1 Unit 3 and Unit 4 (27.6 MW, total), Electra Unit 1, Unit 2, and Unit 3 (98 MW total), Haas Unit 1 and Unit 2 (144 MW total), JB Black Unit 1 and Unit 2 (172 MW total), Pit 1 Unit 1 and Unit 2 (61 MW total), Pit 3 Unit 1, Unit 2 and Unit 3 (70 MW total), Pit 5 Unit 1, Unit 2 and Unit 3 (120 MW), Rock Creek Unit 1 and Unit 2 (126 MW total), and Stanislaus Unit 1 (91 MW). Seven of the planned outages started in the previous Quarter and four outages will continue into the first Quarter of 2021. In addition, there were three maintenance outages lasting longer than 72 hours: Pit 3 Unit 1 (30.5 MW) and Pit 4 Unit 1 and Unit 2 (95 MW total). Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW during the Quarter were incurred at the following facilities: Belden (125 MW), Butt Valley (41 MW), Caribou 1

Unit 1 (25 MW), Caribou 2 Unit 4 and Unit 5 (120 MW total), Drum 1 Unit 1, Unit 2, Unit 3 and Unit 4 (54 MW total), Drum 2 Unit 5 (49.5 MW), Kerckhoff 2 Unit 1 (155 MW), Rock Creek Unit 1 and Unit 2 (126 MW total) and Salt Springs Unit 1 (11 MW).

At PG&E's fossil combined cycle facilities there were no planned outages longer than 72 hours during the Quarter. There was one maintenance outage longer than 72 hours for the Quarter at Gateway Generating Station (580 MW). Additionally, there were no forced outages greater than 24 hours during the Quarter.

At PG&E's Humboldt Bay Generating Station there was one planned outage longer than 72 hours during the Quarter. This was for a major overhaul on Engine 4. There were two maintenance outages lasting longer than 72 hours during the Quarter on Unit 3 and Unit 8. There was one forced outage event at Humboldt Bay Generating Station lasting longer than 24 hours during the Quarter on Unit 5.

During Fourth Quarter 2020, Diablo Canyon Power Plant (DCPP) Unit 1 operated at 63.7 percent capacity factor. During October and November, Unit 1 performed a planned refueling outage to perform maintenance and refuel the reactor.

During Fourth Quarter 2020, DCPP Unit 2 operated at 20.3 percent capacity factor. Two generation-impacting events occurred during the fourth quarter. During October and November, and again in December, Unit 2 performed an unplanned shutdown of the unit to perform maintenance on hydrogen piping inside the main generator.

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

As described in Sections 3.b. and 3.d. above, during the Quarter, PG&E executed transactions in accordance with its Hedging Plan. A list of relevant information

regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachments F and K.

7. Copy of each contract.

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

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

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

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

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

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

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

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

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

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

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

E. Cost Allocation Mechanism (CAM)

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

Advice 6069-E
February 1, 2021

Attachment 2

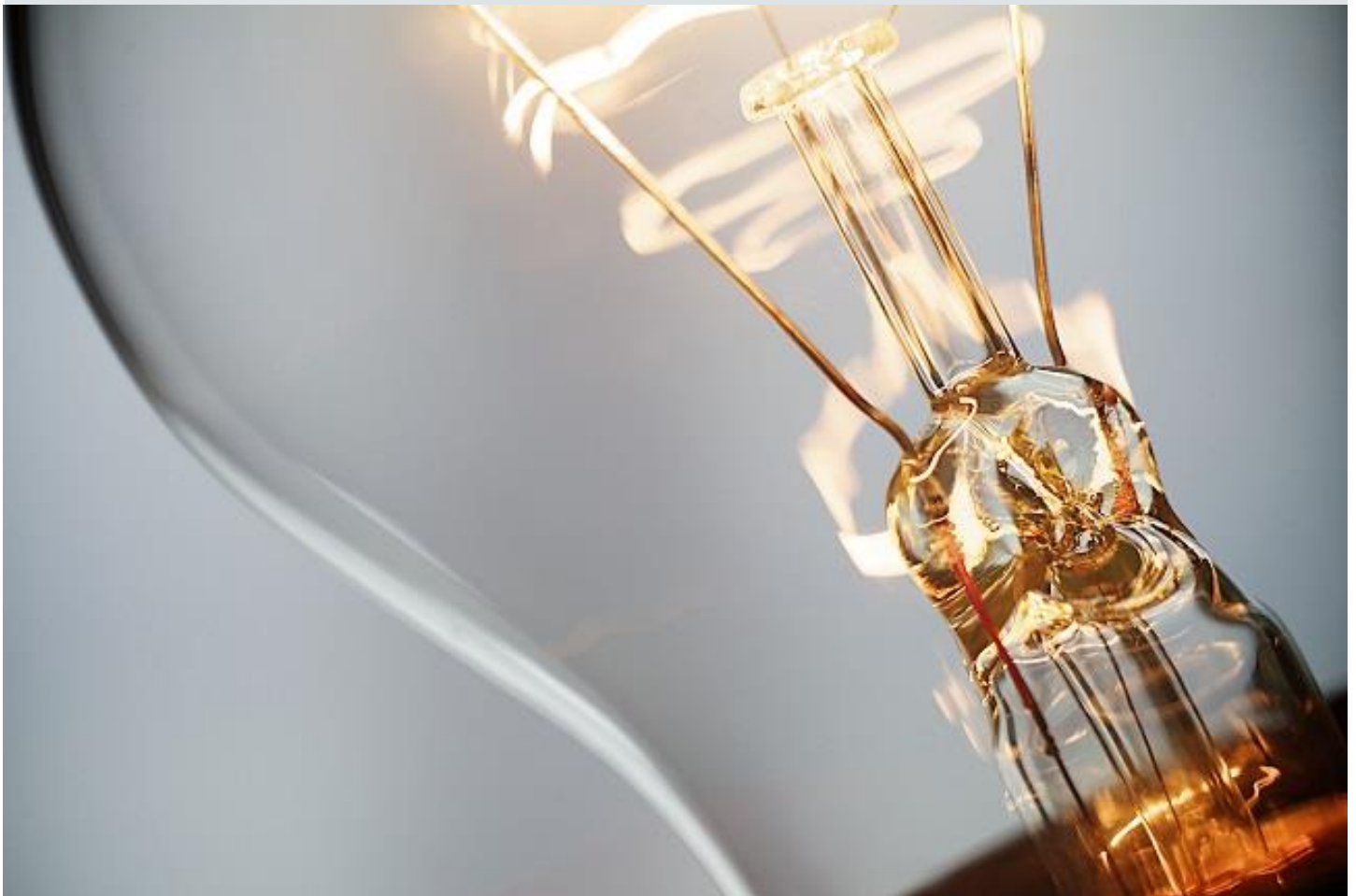
Attachment G-1 (Public Version)



PACIFIC GAS & ELECTRIC

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

January 2021



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EXECUTIVE SUMMARY

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

Overview of Solicitation

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

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

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

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

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

PA's IE Report

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

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

Main IE activities during solicitation

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

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

High level summary of findings

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

Some specific findings are noted below:

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

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

CONTENTS

EXECUTIVE SUMMARY	1
Overview of Solicitation	1
PA's IE Report	2
Main IE activities during solicitation	2
High level summary of findings	2
1 SUMMARY OF THE 2020 MULTI-YEAR RESOURCE ADEQUACY SOLICITATION	6
1.1 PG&E's Local RA Requirements	7
1.2 Conforming and Non-conforming Offers	9
1.3 Solicitation Bid Evaluations, Shortlisting, and Negotiations	9
2 INDEPENDENT EVALUATOR ACTIVITIES DURING THE SOLICITATION	10
2.1 IE's key roles and responsibilities	10
2.2 PA's activities as IE	10
3 ADEQUACY OF PG&E'S OUTREACH	13
3.1 Notifications and announcements	13
3.2 Solicitation materials	13
4 PG&E'S BID EVALUATION DESIGN	14
4.1 Principles used to evaluate methodology	14
4.2 Amount and type of RA products	14
4.3 Description of PG&E's bid evaluation methodology	14
4.4 Evaluation of PG&E's methodology	16
5 FAIRNESS OF PG&E BID EVALUATION	17
5.1 Principles IE used to evaluate evaluation methodology	17
5.2 Administration of bid evaluation process	17
5.3 IE's review of PG&E's conformance checks	17
5.4 Review of PG&E's application of the bid evaluation methodology	17
5.5 IE's review of PG&E's selected shortlists	18
5.6 Fairness of PG&E's evaluation	18
5.7 Recommendations	18
6 MERIT OF SOLICITATION SHORTLIST	20
6.1 Did PG&E conduct the solicitation consistent with Commission decisions and PG&E's defined bid evaluation methodology?	20
6.2 Do selected shortlisted bids provide the best overall value to ratepayers?	20
6.3 Did the shortlist conform to PG&E's RA sales strategy?	20
6.4 Reasonableness of the shortlist	20

7	FAIRNESS OF PROJECT-SPECIFIC NEGOTIATIONS	21
7.1	Principles PA used to evaluate fairness of negotiations	21
7.2	Describe fairness of negotiations	21
7.3	What terms and conditions underwent significant changes during the course of negotiations?	21
7.4	Was similar information and options made available to other participants?	21
8	MERIT OF CONTRACT APPROVAL	22

1 SUMMARY OF THE 2020 MULTI-YEAR RESOURCE ADEQUACY SOLICITATION

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

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

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

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

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

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

1.1 PG&E's Local RA Requirements

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

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

System Resource Adequacy

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

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

Local Resource Adequacy

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

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

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

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

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

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

Flexible Resource Adequacy

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

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

Centralized Procurement

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

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

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

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

Additional Track 2 Considerations

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

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

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

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

1.2 Conforming and Non-conforming Offers

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

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

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

1.3 Solicitation Bid Evaluations, Shortlisting, and Negotiations

[REDACTED]

2 INDEPENDENT EVALUATOR ACTIVITIES DURING THE SOLICITATION

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

2.1 IE's key roles and responsibilities

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

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

2.2 PA's activities as IE

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

2.2.1 Solicitation materials

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

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

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

2.2.2 Bid submittal process

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

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

2.2.3 Communication with bidders

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

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

2.2.4 Initial bid review and conformance check

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

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

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

2.2.5 Evaluation process

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

2.2.6 Shortlist determination

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

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

2.2.7 Contract negotiations

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

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

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

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

2.2.8 PG&E's Procurement Review Group meetings

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

3 ADEQUACY OF PG&E'S OUTREACH

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

3.1 Notifications and announcements

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

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

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

3.2 Solicitation materials

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

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

4 PG&E'S BID EVALUATION DESIGN

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

4.1 Principles used to evaluate methodology

PA used the following principles to guide its evaluation:

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

4.2 Amount and type of RA products

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

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

4.3 Description of PG&E's bid evaluation methodology

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

4.3.1 Conformance check

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

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

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

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

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

4.3.2 Quantitative bid evaluation

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

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

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

Development of supply curves

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

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

Bid optimization

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

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

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

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

4.4 Evaluation of PG&E's methodology

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

5 FAIRNESS OF PG&E BID EVALUATION

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

5.1 Principles IE used to evaluate evaluation methodology

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

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

5.2 Administration of bid evaluation process

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

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

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

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

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

5.4.1 Review of evaluation of offers

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

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

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

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

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

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

[REDACTED]

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

5.6 Fairness of PG&E's evaluation

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

5.7 Recommendations

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

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

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

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

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

6 MERIT OF SOLICITATION SHORTLIST

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

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

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

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

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

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

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

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

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

6.4 Reasonableness of the shortlist

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

7 FAIRNESS OF PROJECT-SPECIFIC NEGOTIATIONS

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

7.1 Principles PA used to evaluate fairness of negotiations

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

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

7.2 Describe fairness of negotiations

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

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

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

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

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

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

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

8 MERIT OF CONTRACT APPROVAL

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

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

Advice 6069-E
February 1, 2021

Attachment 3

Attachment G-2 (Public Version)



FEBRUARY – DECEMBER 2021 RESOURCE ADEQUACY AND IMPORT ENERGY SOLICITATION INDEPENDENT EVALUATOR REPORT

PREPARED FOR PACIFIC GAS & ELECTRIC

January 2021

Bringing Ingenuity to Life
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INDEPENDENT EVALUATOR REPORT

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

Overview of solicitation

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

The Market Notice further noted that PG&E's preference is to transact Import Energy indexed to CAISO LMP but would also consider offers for ICE Indexed or Fixed Prices transactions. Table 1 below summarizes the products sought in the Solicitation.

Table 1. Solicitation Products

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

PG&E received [REDACTED] to the Solicitation and contracted for [REDACTED] PG&E received [REDACTED] IAR [REDACTED] to the Solicitation and contracted for [REDACTED] PG&E received [REDACTED] IE [REDACTED] to the Solicitation and contracted for [REDACTED] In addition, PG&E is currently still finalizing transactions [REDACTED]

Main Independent Evaluator activities during solicitation

PA's role in PG&E's 2021 Feb-Dec RA and Import Energy Solicitation spanned approximately six weeks in November and December 2020. PA performed the role of Independent Evaluator and was involved from PG&E's development of the Market Notice materials through the submittal of the bids/offers and ultimately the negotiation of the [REDACTED] confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in its Solicitation and provided fair and equitable treatment of all bids/offers. PA was in regular contact with PG&E staff throughout the process, addressing PG&E's questions, identifying and resolving potential issues, and providing recommendations throughout the process. The following provides a summary of PA's main activities during this solicitation:

- PA reviewed the Solicitation's Market Notice prior to PG&E's issuance and had no substantial comments or suggested edits to the Notice. PG&E has continually refined its development of a straightforward Market Notice template.
- PA received all communications between PG&E and bidders. PA directly received all of the emails, including bids/offers that were sent to and received from bidders.
- PA reviewed the bids/offers received and negotiation emails with all bidders.
- PA reviewed the draft and executed confirmation documents related to the selected bids/offers.

Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices to PG&E's RA Solicitation distribution list of approximately 450 email addresses. PG&E has conducted multiple RA and related solicitations in the last several years and has continually added to its Solicitation distribution list. In this Solicitation, PG&E included additional outreach beyond the initial Market Notices by sending a follow up email to the entire distribution list to provide the bid form and a subsequent email to the entire distribution list to confirm that all parties received the bid form. This was partially in response to the challenges experienced in the recent 2020 Multi-Year RA Solicitation, during which multiple parties did not receive the bid form due to email security issues. PA understands that PG&E took steps to avoid the bid form delivery issues and believes that PG&E extended adequate outreach for the 2021 Feb-Dec RA and Import Energy Solicitation.

PG&E's Bid Evaluation Methodology

PG&E primarily relied on a quantitative evaluation of each bidder's proposed volumes of RA desired and the bidders' proposed price for each product. Had competing bidders made bids/offers for RA in the same month that exceeded PG&E's available RA or need for RA in that month, PG&E would have selected the higher priced bidder.

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

[REDACTED]

[REDACTED]

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

PG&E's Shortlisting and Negotiations of Confirms

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

As noted, PG&E received [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ultimately, PG&E contracted through this Solicitation [REDACTED] purchases. In addition, PG&E is currently still finalizing transactions [REDACTED]

Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2021 Feb-Dec RA and Import Energy Solicitation.

Some specific findings are noted below:

- PG&E in no way prevented PA from observing its process and analyzing its methods and did not interfere with PA's conducting the Independent Evaluation.
- PA finds that PG&E's outreach for this Solicitation was adequate and that the Market Notice materials were clear and concise related to the Solicitation. PG&E addressed prior bid form delivery issues via follow up emails to potential bidders to confirm they received the bid form with no complications.
- PA notes that PG&E has developed increasingly smooth RA and IAR Solicitations. While many bidders have recently contracted with PG&E; there also have been an increasing number of new counterparties to PG&E's RA procurements, requiring the negotiation and execution of EEI Master Agreements and transaction specific Confirmation Agreements. This has caused some delays in final execution of the transactions identified herein; however, PG&E expects no issues in executing these agreements.
- Based on our review of PG&E's analysis, our participation in calls and meetings and other IE activities, PA finds that PG&E conducted the 2021 Feb-Dec RA and Import Energy Solicitation fairly.



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Attachment 4

Attachment H (Public Version)

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

New Contracts Executed and Amended During the Quarter

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

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

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

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
CCSF, acting by and thru its PUC, Power Enterprise (33B250T01)	10/20/2020	Local, Flexible RA (Sale)			16 MW 27 MW 10 MW			Q4 2020 E- Solicitation
		Local RA (Sale)			50 MW 18 MW 58 MW			

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Pioneer Community Energy (33B245U01)	10/20/2020	Local, Flexible RA (Purchase)	N/A		1 MW 1 MW 1.5 MW			Q4 2020 E- Solicitation
Pioneer Community Energy (33B245T01)	10/20/2020	System RA (Sale)			10 MW 10 MW			Q4 2020 E- Solicitation
		Local, Flexible RA (Sale)			1 MW 1 MW 1.5 MW			
CCSF, acting by and thru its PUC, CleanPowerSF (33B243T01)	10/20/2020	Local RA (Sale)			6 MW 27 MW 11 MW 11 MW 11 MW 11 MW 2 MW 2 MW 0.19 MW 6.42 MW			Q4 2020 E- Solicitation
East Bay Community Energy Authority (33B238U03)	10/20/2020	Local, Flexible RA (Sale)	N/A		97 MW 97 MW			Q4 2020 E- Solicitation
Central Coast Community Energy (33B236T02)	10/20/2020	System RA (Sale)			84 MW 124 MW 30 MW 124 MW 11 MW			Q4 2020 E- Solicitation
		Local RA (Sale)			36 MW 37 MW 3 MW 36 MW 37 MW 4 MW 36 MW 37 MW 3 MW 36 MW 37 MW 1 MW 36 MW 37 MW 4 MW			
Marin Clean Energy (33B235U03)	10/20/2020	Local, Flexible RA (Sale)			10.5 MW 10.5 MW 10.5 MW 2 MW			Q4 2020 E- Solicitation
		Local RA (Sale)			8 MW 6 MW 8 MW 8 MW			

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Clean Energy (33B235U04)	10/20/2020	Local, Flexible RA (Purchase)			10.5 MW 10.5 MW 10.5 MW			Q4 2020 E- Solicitation
		Local RA (Purchase)			8 MW 6 MW 8 MW 8 MW 2 MW			
Peninsula Clean Energy Authority (33B232T01)	10/20/2020	Local, Flexible RA (Sale)			48 MW 9.7 MW 9.7 MW 9.65 MW 44 MW 48 MW 27.3 MW 9 MW			Q4 2020 E- Solicitation
		Local RA (Sale)			8 MW 32 MW 2 MW 2 MW			
Silicon Valley Clean Energy Authority (33B230U01)	10/20/2020	Local, Flexible RA (Sale)			1 MW			Q4 2020 E- Solicitation
		Local RA (Sale)			3 MW 5.5 MW 3 MW 16.37 MW 66.13 MW 3 MW 16.37 MW 55.27 MW 3 MW 16.37 MW 54.05 MW 3 MW 16.37 MW 42.6 MW 7.02 MW 6.28 MW 6.38 MW 44 MW 3 MW 64.55 MW			

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
3 Phases Renewables, Inc. (33B113U01)	10/20/2020	Local, Flexible RA (Sale)			3 MW 3 MW 3 MW			Q4 2020 E- Solicitation
Exelon Generation Company, LLC (33B251T05)	10/21/2020	Local, Flexible RA (Sale)			15 MW 15 MW			Q4 2020 E- Solicitation
		Local RA (Sale)			4 MW 7 MW 7 MW 3 MW 4 MW 3 MW 4 MW 3 MW 3 MW 3 MW			
City of San Jose (San Jose Clean Energy) (33B247T04)	10/21/2020	System RA (Sale)	N/A		55 MW 64 MW			Q4 2020 E- Solicitation
		Local, Flexible RA (Sale)			20 MW			
		Local RA (Sale)			28.7 MW 67.5 MW 3 MW 6 MW 121 MW 121 MW 3 MW 17 MW 3 MW			
City of San Jose (San Jose Clean Energy) (33B247T05)	10/21/2020	System RA (Purchase)	N/A		28.7 MW			Q4 2020 E- Solicitation
City of San Jose (San Jose Clean Energy) (33B247T06)	10/21/2020	Import Allocation Rights (Sale)	N/A		34 MW 6 MW			Q4 2020 E- Solicitation
Marin Clean Energy (33B235U05)	10/23/2020	Local RA (Sale)			10 MW			Q4 2020 E- Solicitation

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Marin Clean Energy (33B235U06)	10/23/2020	Local, Flexible RA (Purchase)			5 MW 5 MW			Q4 2020 E- Solicitation
		Local RA (Purchase)			5 MW 5 MW 5 MW 10 MW 10 MW 10 MW 10 MW 10 MW 10 MW 10 MW			
Peninsula Clean Energy Authority (33B232U02)	10/27/2020	Local, Flexible RA (Sale)			33.5 MW 32 MW			Q4 2020 E- Solicitation
Southern California Edison Company (33B217T05)	10/29/2020	Local, Flexible RA (Purchase)			203 MW 337 MW 246 MW 267 MW			Q4 2020 Market RFP
Southern California Edison Company (33B217T06)	10/29/2020	Local, Flexible RA (Purchase)			42 MW 42 MW 42 MW 42 MW			Q4 2020 Market RFP
		Local RA (Purchase)			18 MW 18 MW 8 MW 18 MW 18 MW 4 MW 3 MW 5 MW 1 MW 1 MW 27 MW 9.8 MW 4.2 MW 2 MW 0.28 MW 1 MW 27 MW 4.72 MW 7 MW			

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Southern California Edison Company (33B217T07)	10/29/2020	Local, Flexible RA (Purchase)			368 MW 154 MW 368 MW 84 MW 368 MW 224 MW 236 MW 263 MW 244 MW 4 MW 244 MW 16 MW 1 MW			Q4 2020 Market RFP
Southern California Edison Company (33B217T08)	10/29/2020	Local, Flexible RA (Purchase)			42 MW 42 MW 42 MW 42 MW 42 MW 42 MW 37 MW 32.04 MW 14.15 MW			Q4 2020 Market RFP
		Local RA (Purchase)			8 MW 18 MW 18 MW 18 MW 1 MW 18 MW 5 MW 2 MW 8 MW 4 MW 14 MW 4 MW 5 MW 18.96 MW 4 MW 27 MW 9.85 MW			

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Dynegy Marketing and Trade, LLC (33B263T01)	10/30/2020	Local RA (Purchase)			200 MW 300 MW			Q4 2020 E- Solicitation
Sierra Energy Storage, LLC (33B262T01)	10/30/2020	Local, Flexible RA (Purchase)			10 MW 10 MW			Q4 2020 E- Solicitation

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
East Bay Community Energy Authority (33B238T02)	12/14/2020	System RA (Purchase)	N/A		16 MW			Q4 2020 E- Solicitation
East Bay Community Energy Authority (33B238T03)	12/14/2020	Local RA (Sale)			16 MW			Q4 2020 E- Solicitation
Peninsula Clean Energy Authority (33B232T02)	12/17/2020	System RA (Sale)	N/A		34 MW			Q4 2020 E- Solicitation
Clean Power Alliance of Southern California (33B240T01)	12/31/2020	System RA (Purchase)	N/A		75 MW 75 MW 50 MW 75 MW 50 MW 18 MW 18 MW 75 MW 50 MW 75 MW 50 MW 75 MW 50 MW 34 MW			Q4 2020 E- Solicitation

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

The table below provides a summary of Natural Gas Storage e-solicitation contract executed through competitive processes during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contract subject to this QCR filing is included.

Contract/ Counterparty Name	Trade Date	Product	Term	Cmpt.	Volume	Price	Notional Value (\$)	Confirm File Name
	11/20/2020	Gas Storage Services		Inventory				Q4 2020 Gas Storage E- solicitation
				Injection 1 (April – October months)				
				Withdrawal 1 (April – October months)				
				Injection 1 (November – March months)				
				Withdrawal 1 (November – March months)				

¹ Since the injection and withdrawal charges are variable charges they are not included in the notional value.

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
3 Phases Renewables, Inc. (33B113T01)	10/28/2020	Local, Flexible RA (Purchase)			3 MW 3 MW 3 MW 3 MW 2 MW 2 MW 2 MW 2 MW 2 MW			Q4 2020 Bilateral
		Local RA (Purchase)			1 MW 1 MW 1 MW 1 MW 3 MW 1 MW 3 MW 1 MW 1 MW 1 MW 1 MW 2 MW 1 MW 1 MW			
3 Phases Renewables, Inc. (33B113T02)	10/28/2020	System, Flexible RA (Sale)	N/A		2 MW 3 MW 1 MW 3 MW 3 MW 3 MW			Q4 2020 Bilateral

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume	Price	Notional Value (\$)	Confirm File Name
Calpine Energy Services, L.P. (33B029S02)	11/20/2020	System RA (Sale)	N/A		145 MW			Q4 2020 Bilateral
3 Phases Renewables, Inc (33B113T03)	12/3/2020	Local RA (Purchase)	Stockton Stockton		3.46 MW 3.51 MW			Q4 2020 Bilateral

Informational purposes only: A summary of the RA Sale contracts executed during the Quarter to be approved in the 2020 ERRR Compliance Filing. For further details, please see PG&E's Q4 2020 QCR Public Narrative.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Southern California Edison Company (33B217T09)	10/29/2020	System, Flexible RA (Sale)	Various	Contract	N/A	2020 ERRR Compliance Filing
Southern California Edison Company (33B217T10)	10/29/2020	System, Flexible RA (Sale)	Various	Contract	N/A	2020 ERRR Compliance Filing
		System RA (Sale)				

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q4 2020

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Western Power and Steam II (25C138QPA)	10/5/2020	PURPA	27 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron U.S.A. (SE Kern River) (25C246)	10/13/2020	QF	19 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron U.S.A. (Coalinga) (25C055)	10/13/2020	QF	19 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron U.S.A. (Cymric) (25C003)	10/13/2020	QF	19 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Chevron U.S.A. (Taft/Cadet) (25C002)	10/13/2020	QF	19 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRA Compliance Filing
Yellowjacket Venture, LLC (04H134)	10/15/2020	QF	N/A	Consent to Assignment - General Consent	N/A	2020 ERRA Compliance Filing
Crockett Cogeneration (01C045)	10/23/2020	QF	N/A	Non-Routine Amendment to Existing Agreement	N/A	2020 ERRA Compliance Filing
Crockett Cogeneration (01C045)	12/23/20	QF	N/A	Non-Routine Amendment to Existing Agreement	N/A	2020 ERRA Compliance Filing

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q4 2020

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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
SPI Biomass Portfolio (33R254)	10/5/2020	RPS	27 days	Short-Term Incremental Deliveries for System Reliability Needs	N/A	2020 ERRR Compliance Filing
Woodland Biomass (33R493)	10/21/2020	RPS	5 years	Contract	10/27/2020	Advice Letter 5983-E
Blythe Energy Storage 110, LLC (40S021)	10/21/2020	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing
Dynegy Marketing and Trade, LLC (33B263)	10/30/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
Sierra Energy Storage, LLC (33B262)	10/30/2020	EEI Master	N/A	Contract	N/A	2020 ERRR Compliance Filing
Ava Elizabeth (33R494)	11/2/2020	GTSR – PG&E Regional Renewable Choice	20 years	Contract	N/A	Advice Letter Pending
ForeFront C2 (33R495)	11/2/2020	GTSR – PG&E Regional Renewable Choice	20 years	Contract	N/A	Advice Letter Pending
Silicon Valley Clean Energy Authority (33B230CA01)	11/5/2020	Carbon Free Energy (Sale)	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing
La Joya Del Sol #1 (33R154AB)	11/6/2020	AB1969/FIT	N/A	Consent to Assignment - Financing	N/A	2020 ERRR Compliance Filing
Midway Solar Farm I (33R343)	11/9/2020	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRR Compliance Filing

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Calpine Russell City Energy Center (33B075)	11/13/2020	Tolling	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRA Compliance Filing
Central Coast Community Energy (3CE) (33B236CA02)	11/16/2020	Carbon Free Energy (Sale)	N/A	Routine Amendment to Existing Agreement	N/A	2020 ERRA Compliance Filing
Daggett Solar Power 2 LLC (40S022)	12/10/2020	Energy Storage	15 years	Contract	12/22/2020	Advice Letter Filing 6033-E
Daggett Solar Power 3 LLC (40S023)	12/10/2020	Energy Storage	15 years	Contract	12/22/2020	Advice Letter Filing 6033-E
LeConte Energy Storage, LLC (40S024)	12/10/2020	Energy Storage	15 years	Contract	12/22/2020	Advice Letter Filing 6033-E
North Central Valley Energy Storage, LLC (40S025)	12/10/2020	Energy Storage	15 years	Contract	12/22/2020	Advice Letter Filing 6033-E
Nexus Renewables U.S. Inc. (40S026)	12/10/2020	Energy Storage	15 years	Contract	12/22/2020	Advice Letter Filing 6033-E
Lancaster Area Battery Storage, LLC (40S027)	12/10/2020	Energy Storage	15 years	Contract	12/22/2020	Advice Letter Filing 6033-E
Orion Solar (33R162)	12/17/2020	RPS	N/A	Consent to Assignment - Financing	N/A	2020 ERRA Compliance Filing
North Sky River Energy Center (33R163)	12/29/2020	RPS	N/A	Consent to Assignment - Financing	N/A	2020 ERRA Compliance Filing

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

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

Contract/ Counterparty Name	Termination or Expiration¹	Date	Product	Volume (MW)
Powerex (S&F for Vantage Wind) (33R095)	Expiration	10/3/2020	Shape + Firm	N/A
Lone Oak Dairy Digester (33R466BIO)	Termination	10/13/2020	BioMAT	1.028
Oroville Cogeneration, L.P. (33B116)	Expiration	10/14/2020	Tolling	7.5
Blake's Landing (33R146AB)	Expiration	11/1/2020	AB1969/FIT	0.08
Kern Front Limited (33B107QSA)	Expiration	11/30/2020	Tolling	47
High Sierra Limited (33B106QSA)	Expiration	11/30/2020	Tolling	47
Double C Limited (33B105QSA)	Expiration	11/30/2020	Tolling	47
Donald R. Chenoweth (01W119)	Termination	12/5/2020	QF	0.01
Kern River Cogen Company (KRCC) (33B118)	Expiration	12/31/2020	Tolling	311.9
Midway Sunset Cogeneration Company (33B126)	Expiration	12/31/2020	Tolling	227
3 Phases Renewables, Inc. (33R426)	Expiration	12/31/2020	RPS Energy REC Sale	N/A

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

² Termination date finalized in Q4 2020.

Confidential Attachment H

Pacific Gas and Electric Company Procurement Transaction Quarterly Compliance Report Q4 2020

Contract/ Counterparty Name	Termination or Expiration ¹	Date	Product	Volume (MW)
Direct Energy Business Marketing, LLC (33R427)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Exelon Generation Company, LLC (33R428)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Shell Energy North America (US), L.P. (33R429)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Central Coast Community Energy (33R443)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Shell Energy North America (US), L.P. (33R451)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Direct Energy Business Marketing, LLC (33R453)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Clean Power Alliance of Southern California (33R454)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Central Coast Community Energy (33R455)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Calpine Energy Services, L.P. (33R456)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Powerex Energy Corp. (33R457)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Sacramento Municipal Utility District (33R460)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Central Coast Community Energy (33R461)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Shell Energy North America (US), L.P. (33R462)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
East Bay Community Energy Authority (33R463)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Silicon Valley Clean Energy Authority (33R464)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Direct Energy Business Marketing, LLC (33R465)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Clean Power Alliance of Southern California (33R471)	Expiration	12/31/2020	RPS Energy REC Sale	N/A

Confidential Attachment H

**Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2020**

Contract/ Counterparty Name	Termination or Expiration¹	Date	Product	Volume (MW)
City of San Jose (San Jose Clean Energy) (33R473)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Peninsula Clean Energy Authority (33R474)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Powerex Energy Corp. (33R476)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Exelon Generation Company, LLC (33R477)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Marin Clean Energy (33R478)	Expiration	12/31/2020	RPS Energy REC Sale	N/A
Silicon Valley Clean Energy Authority (33R482)	Expiration	12/31/2020	RPS Energy REC Sale	N/A

Attachment 5

Confidentiality Declarations and Matrix

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6069-E**

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

I, Jay Bukowski, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since October 1998. My current title is Manager within PG&E's Energy Policy and Procurement organization. In this position, my responsibilities include review of regulatory reports and managing PG&E's Procurement Review Group and Independent Evaluator program. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.
2. Based on my knowledge and experience, and in accordance with Decisions ("D.") 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's February 1, 2021 Advice Letter 6069-E, Confidential Attachments F and K.
3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6069-E**

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

I, John Ulloa, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E") and have been an employee since 1998. My current title is Manager, Electric Gas Supply in the Electric and Gas Acquisition Department, which is part of the Energy Policy and Procurement organization. I am responsible for physical and financial trading of gas in support of PG&E's utility-owned generation plants and PG&E's tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.
2. Based on my knowledge and experience, and in accordance with Decisions ("D.") 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's February 1, 2021 Advice Letter 6069-E, Confidential Attachments A, B, D, J, and L.
3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-

066, 14-10-033 and Public Utilities Code Section 454.5(g). The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on February 1, 2021, at San Francisco, California.

/s/
John Ulloa

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6069-E**

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

I, Marianne Aikawa, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E") and have been an employee at PG&E since 1989. My current title is Senior Manager within PG&E's Energy Policy and Procurement organization. In this position my responsibilities include reviewing regulatory reports. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.
2. Based on my knowledge and experience, and in accordance with Decisions ("D.") 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's February 1, 2021 Advice Letter 6069-E, Confidential Attachments A, B, C, E, G, H, J, L and M.
3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-066, 14-10-033 and/or Public Utilities Code Section 454.5(g). The matrix also specifies why

confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on February 1, 2021, at San Francisco, California.

/s/
Marianne Aikawa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6069-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2020
FEBRUARY 1, 2021**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	D.14-10-033, GHG Confidential Information Matrix (As corrected by D. 15-01-024)	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Confidential Attachment E, Q4 2020 GHG Materials folder: File name: 07_PGE PRG Pres GHG Position Update_121520.pdf, "Market Data Review, GHG Dispatch Curve", page 4 File name: 04_2020 Q4_Offset Procurement Strategy_Electric.docx	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite
Confidential Attachment F, Confid Atachment F Qtr04 2020 zip file: File name: PGE PRG Pres GHG Position Update_121520.pdf, "Market Data Review, GHG Dispatch Curve", page 4, email attachment Confidential Attachment F, Confid Atachment F Qtr04 2020 Mtgs, December 15 2020 folder: File name: PGE PRG Pres GHG Position Update_121520.pdf, "Market Data Review, GHG Dispatch Curve", page 4	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6069-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2020
FEBRUARY 1, 2021**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment A – Physical and Financial Electric Transactions	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 years
Attachment A – Physical and Financial Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6069-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2020
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Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (Electric and Natural Gas Transactions, Carbon Free Transactions)	Public Utilities Code Section 454.5(g)	The information contains confidential counterparty information. Release of this commercially market sensitive information could impact market prices because it would release financing terms to other market participants and impact future negotiations. This could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage by the disclosure of counterparty information. This information could be used by other market participants to gain a commercial advantage.	3 Years
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (GHG Transactions)	D.14-10-033 Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations. Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board ("CARB") auctions and PG&E's net open position for GHG compliance.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6069-E
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Document: Quarterly Compliance Report			
Attachment C – in its entirety: Electric Transactions	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
Attachment D – in its entirety: Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6069-E
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Attachment E – in its entirety: Other Transactions (Electric Information) (Except Greenhouse Gas (“GHG”) Information, which is presented separately below)	<p>Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)</p> <p>Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;</p> <p>Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids</p>	<p>Disclosure of information in these executed contracts could provide market participants regarding PG&E’s net open position.</p> <p>Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E’s customers.</p>	<p>3 Years</p> <p>3 Years</p>
Attachment E – in its entirety: Other Transactions- (GHG Information)	<p>D.14-10-033</p> <p>Public Utilities Code Section 454.5(g)</p>	<p>This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.</p>	Indefinite

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

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
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Attachment G - Independent Evaluator (IE) Reports	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.	3 Years
	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years
Attachment H - Executed Contracts	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.	3 Years
	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Item VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years

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

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6069-E
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Attachment K – Risk Management	Item XII – Monthly Portfolio Risk Assessment of Appendix 1 of D.06-06-066 for three years.	Value at Risk (VaR) or electric and gas for electric generation is deemed confidential the matrix. Public disclosure of TeVaR results would be detrimental for PG&E and its electric customers. Such disclosure would release confidential, sensitive market intelligence that would place PG&E at an unfair disadvantage in the energy and financial markets.	3 years
	Public Utilities Code 454.5(g)	Risk and Strategy papers are proprietary company information that if made public could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage.	Indefinite
Attachment L – In its entirety: Reasonable Number of Analyses	Item I) A) 4) Long-term fuel (gas) buying and hedging plans,	This information includes detailed information on PG&E's hedging plan, and must remain confidential to avoid disclosing PG&E's market strategy.	Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Public Utilities Code 454.5(g)	Information concerning a description of PG&E's long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage if publicly disclosed.	Indefinite

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Attachment L - Reasonable Number of Analyses – Electric	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve details which would reveal PG&E's position in the marketplace.	3 Years
	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years
	VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation.	Monthly procurement costs (ERRA Filings) are confidential for 3 years
	Item XI) Monthly Procurement Costs (Energy Resource Recover Accounts [ERRA] Filings) D-14-10-033	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.	Indefinite
Attachment M – Executed Contracts	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years

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

AT&T
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