

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6165E
As of July 6, 2022

Subject: Request for Approval of Additional Cost Recovery Associated with the Successful Deployment of IT Project Work to Increase Electric Rule 24 Registration Capacity to 200,000 Locations

Division Assigned: Energy

Date Filed: 04-16-2021

Date to Calendar: 04-21-2021

Authorizing Documents: None

Disposition:	Signed
Effective Date:	06-23-2022

Resolution Required: Yes

Resolution Number: E-5155

Commission Meeting Date: None

CPUC Contact Information:

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AL Certificate Contact Information:

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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



Erik Jacobson
Director
Regulatory Relations

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

Fax: 415-973-3582

April 16, 2021

Advice 6165-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Request for Approval of Additional Cost Recovery Associated with the Successful Deployment of IT Project Work to Increase Electric Rule 24 Registration Capacity to 200,000 Locations

Purpose

Pacific Gas and Electric Company (PG&E) seeks approval from the California Public Utilities Commission (Commission or CPUC) to recover \$156,000 in additional costs associated with the successful deployment of IT systems enhancements supporting PG&E's California Independent System Operator Corporation (CAISO) location review process and associated business processes to support the continuing growth in the number of Electric Rule 24 (Rule 24) registrations. PG&E completed its implementation of the IT project work scope on December 9, 2020 to expand its current capacity to support a total of 200,000 Rule 24 registrations, as authorized by the Commission in Resolution E-4983. Post-deployment stabilization activities were completed effective January 15, 2021. PG&E requests approval to shift up to \$156,000 in available funding from the Beyond Intermediate Step budget authorization, which was approved by the Commission in Resolution E-4837, issued on January 11, 2018 to (1) cover unanticipated costs incurred by PG&E for Project 1 work scope items and (2) conduct additional performance/stress testing of Rule 24 and ShareMyData IT systems and processes as described below. PG&E requests an extension of time to complete the additional testing activity by September 30, 2021. Lastly, PG&E recommends that the Commission initiate a workshop for third-party Demand Response Providers to provide information about their expected demands for Rule 24 registrations to inform future increases in scale for Rule 24 and Share My Data systems.

Background

The Commission opened Rulemaking (R.) 07-01-041 in January 2007 to address several specific issues related to the Commission's efforts to develop effective demand response (DR) programs for California's investor-owned electric utilities (IOUs). On November 9, 2009, Phase IV of the Rulemaking was opened to address issues resulting from FERC Order 719, which, in relevant part, required the CAISO to modify its tariffs to allow retail

customers to bid Demand Response (DR) directly into CAISO's wholesale energy and ancillary services markets, either on their own behalf or through aggregators. On June 3, 2010, the Commission issued Decision (D.) 10-06-002, subsequently modified by D.10-12-060, establishing the initial conditions under which it would oversee bidding of retail DR directly into the CAISO markets, consumer protection mechanisms, financial settlements, and communications protocols. The Commission resolved these remaining policy issues in D.12-11-025 and directed the IOUs to continue to work with stakeholders from the proceeding to refine a proposed tariff rule and related documents that would address roles, responsibilities, rights and obligations under the direct participation regime. PG&E submitted Advice 4298-E on October 10, 2013, on behalf of Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and itself, the three investor-owned utilities (IOUs), with the revised Rule 24 tariff¹ and related documents.²

On March 26, 2015, the Commission issued D.15-03-042 and ordered the Initial Implementation Step of direct participation for Demand Response Providers (DRPs) in the CAISO wholesale energy market by January 1, 2016. This authorized PG&E to build systems and processes to support 10,000 Rule 24 registrations³ with \$2.9 million to be used between 2015 and 2016 for the CAISO's day-ahead energy market.⁴ This budget included IT systems and manual business processes built to the CAISO's Demand Response Registration System (DRRS) as of Spring 2015, operations and maintenance (O&M), two full-time equivalents (FTE) between 2015 and 2016, and Kern USA LLC ("Kern") contractor costs to support the intake of CISR-DRPs. In addition, PG&E later requested \$0.7 million in cost recovery to support the extension of O&M through 2017 in its 2017 transition year filing served on February 1, 2016,⁵ which the Commission approved in D.16-06-029.

In compliance with D.15-03-042,⁶ the IOUs served testimony on March 11, 2015, proposing budgets for ancillary and real-time energy services (AS/RTE) for the Initial Implementation Step of direct participation, and the Commission issued D.16-03-008

¹ The applicable rule is Electric Rule 24 for SCE and Electric Rule 32 for SDG&E. Henceforth, any reference to Rule 24 applies to Rule 24 for SCE and PG&E, and Rule 32 for SDG&E.

² The Commission approved Advice 4298-E in Resolution E-4630 on March 19, 2014, with modifications consistent with D.13-12-029.

³ Each customer location, referred to as a Rule 24 registration, that participates in a third party DRP's aggregation and bid into the CAISO wholesale market must be registered at the CAISO. Once an IOU receives authorization from a customer to release its data to a DRP or partnering DRPs via the completed Customer Information Service Request form for DRPs (CISR-DRP), IOUs are required to provide DRPs with customer usage data, which the DRPs and their scheduling coordinators use to develop settlement quality meter data (SQMD) in order to settle transactions with the CAISO.

⁴ D.15-03-042, Ordering Paragraph (OP) 5 and OP 9.

⁵ PG&E Transition Year Proposal, filed February 1, 2016, page 25.

⁶ D.15-03-042, OP 7.

authorizing the IOUs' budgets with modifications.⁷ PG&E was authorized cost recovery of approximately \$1.8 million for hardware and service costs associated with 15-minute interval data for AS/RTE, including Silver Springs Network hardware and direct labor costs to install hardware, customer data and analytics hardware, Meter Data Management Systems (MDMS) changes, project delivery resources, capital overheads, and allowance for funds used during construction (AFUDC).⁸

Decision 15-03-042 also ordered the IOUs to file comments within seven months describing volumes beyond the Initial Implementation Step, referred to as the Intermediate Implementation step.⁹ In addition, as the Commission stated that targets set in the Decision "should be dynamic ceilings that will rise over time and should not be reached," IOUs were ordered to inform the Commission within 6 months if it expected to exceed the number of registrations in their respective Initial Implementation Steps.¹⁰ The IOUs provided comments on the expansion of the Initial Implementation Step on November 30, 2015, and on December 8, 2015, PG&E filed a notice with the Commission that it could potentially exceed its 10,000 Rule 24 Initial Implementation Step registrations. Administrative Law Judge (ALJ) Hymes issued a ruling on January 22, 2016, to hold a prehearing conference on February 6, 2016, and directed PG&E to submit its Intermediate Implementation Step testimony, which it filed on February 29, 2016. PG&E included residential meter reprogramming costs for both the Initial and Intermediate Implementation steps in its February 29, 2016 testimony. A workshop was held on March 7, 2016, and on March 11, 2016, ALJ Hymes issued a ruling requesting that the IOUs file opening briefs on an Intermediate Implementation step.

PG&E filed its opening brief on April 1, 2016, on its request for cost recovery for a total of 40,000 registrations (200,000 CISR-DRPs), an incremental increase of 30,000 registrations (150,000 CISR-DRPs) from the Initial Implementation Step for both day-ahead energy and AS/RTE. PG&E requested approximately \$5.7 million in expense over 2016-2017 and \$50,000 in capital. The incremental work needed to support the Intermediate Implementation step included 5 FTEs in 2016 and 6 FTEs in 2017; Kern contractor costs to support CISR-DRP intake; data storage of CISR-DRP images; IT build for the new DRRS application programming interface (API); IT enhancements to support additional registrations; and hardware and service costs associated with 15-minute interval data, expense, and business O&M for AS/RTE. PG&E also included the scope of work associated with residential meter reprogramming and customer notification letters

⁷ D.16-03-008, page 17, also approved a ratio of 1 Rule 24 registration to 5 CISR-DRPs.

⁸ PG&E proposed meter reprogramming to more granular levels, but did not request recovery of meter reprogramming costs until its February 29, 2016, testimony on Intermediate Implementation. However, the Commission decision on AS/RTE for the Initial Implementation Step, D.16-03-008, page 1, only allowed meter reprogramming to 15-minute intervals, and rejected reprogramming further to 5-minute intervals. The project was completed by March 17, 2017.

⁹ D.15-03-042 OP 15.

¹⁰ D.15-03-042, page 36.

for both the Initial and Intermediate Implementation steps.¹¹ The Commission approved a budget for PG&E of \$5.4 million in D.16-06-008 for Intermediate Implementation, which included a slight cost reduction associated with the rejection of PG&E's request to send customers a verification letter regarding their CISR-DRP authorization. PG&E requested \$12,931,000 of on-going O&M costs for 2018-2022 to cover the 40,000 authorized Rule 24 registrations in A.17-01-012, and the Commission approved this request in D.17-12-003.

Decision 16-06-008 also approved a mechanism for the IOUs to recover costs up to their previous Rule 24 authorized costs to date (\$10.39 million for PG&E) to increase the number of registrations beyond the Intermediate Implementation Step, but not to reach Mass Market Implementation.¹² The IOUs could request additional funding via a Tier 3 advice letter process as long as it occurred prior to a final decision in the 2018 DR application process, and the IOUs notified the service list of A.14-06-001 et al. of the proposed AL prior to filing such AL and discussed the contents of the AL in a meeting with the service list of A.14-06-001 et al.

On January 3, 2017, PG&E filed a Petition for Modification (PFM) of D.16-06-008 to seek funding flexibility to limit delays or barriers to the growth of direct participation, among other topics. On June 15, 2017, the Commission issued D.17-06-005, allowing the IOUs to submit Tier 3 advice letters to request Commission approval for cost recovery of additional improvements in Rule 24 implementation up to the budget cap, including, but not limited to, Mass Market Implementation. The funding could also be requested after a final decision in the 2018 DR application process. For PG&E, the budget cap was determined to be \$10.39 million.¹³

Concurrently with the PFM process, the Commission ordered the IOUs to "ensure that the availability of customer registrations does not limit 2018-2019 DRAM pilot procurement – the number of customer registrations should be dynamic."¹⁴ The Commission then ordered the IOUs in OP 5 to submit an advice letter by February 7, 2017, using the process described in OP 13 of D.16-06-008, if needed, to aggressively increase customer registrations in 2018-2019. PG&E submitted Advice 5014-E to seek Commission approval of a proposal and budgets for increasing the number of Rule 24 registrations to 75,000 registrations, named the Beyond the Intermediate Implementation Step, which represented an incremental 35,000 registrations. This request included \$1.914 million in funding for an additional FTE between 2017 and 2022, Kern contractor costs, and IT enhancements, which were approved in Resolution E-4837.

¹¹ PG&E Demand Response Rule 24 Intermediate Implementation Step and Cost Recovery Phase 2 Testimony, filed February 29, 2016.

¹² D.16-06-008, OP 13.

¹³ D.17-06-005, OP 4.

¹⁴ Resolution E-4817, OP 3.

On April 27, 2017, in response to Petitions for Modifications (PFM) filed by Comverge, Inc., CPower, EnerNOC, Inc., and EnergyHub (collectively, the “Joint DR Parties”) and OhmConnect, the Commission determined that business opportunities for DRPs could be limited under the corresponding \$27 million budget approved for the 2018-2019 DRAM RFO.¹⁵ As a result, the Commission ordered the IOUs and asked other parties to respond to a series of questions pertaining to an additional pilot auction in 2018 for 2019 deliveries.¹⁶ On October 26, 2017, the Commission issued D.17-10-017, and determined that it is reasonable to require PG&E, SCE, and SDG&E to conduct an additional 2018 auction for contract deliveries in 2019 (2019 DRAM RFO).¹⁷ PG&E procured 63 additional megawatts (MW) in the subsequent 2019 DRAM RFO pilot.

On December 19, 2018, PG&E filed Advice 5446-E, seeking authority to recover costs totaling \$890,000 to fund IT work to enhance its CAISO location review systems and processes to support up to 200,000 CAISO locations registered with third party DRPs. The funding authorization request also included IT work for a set of enhancements to internal systems and tools supporting other aspects of Rule 24 program administration to improve and optimize existing capabilities and to scale with the increase in Rule 24 authorizations associated with the growing volume of CAISO locations. PG&E requested authority to utilize the project funding in 2019 and through 2020 to avoid delays in project completion once the project work has begun.

The CPUC approved Advice 5446-E without modification via Resolution E-4983, issued on October 11, 2019.

PG&E issued a notice on November 20, 2020, to the R.13-09-011 and A.14-06-001 et al service lists. The notice stated that PG&E will be filing this advice letter, and that in compliance with OP 13 of D.16-06-008, a meeting would be held on December 3, 2020, to discuss the contents of the advice letter prior to filing. PG&E held a call on December 3, 2020, to discuss the specifics of the proposed advice letter with the parties and Commission staff, and this advice letter is submitted in accordance with this order. During the call with the Commission Energy Division staff, it was suggested that PG&E may want to consider fund shifting using available funds from previous Commission authorizations instead of requesting Commission approval for new funds to cover the unanticipated costs.

Request for additional funding and for extension of time until September 30, 2021 to complete additional testing activity for the 200,000 CAISO location increase project

¹⁵ Petition of the Joint DR Parties for Modification of D.16-06-029 was filed February 3, 2017, in R.13-09-011. Petition for Modification of OhmConnect of D.16-09-056 was filed December 30, 2016, in R.13-09-011.

¹⁶ D.17-04-045, OP 6.

¹⁷ D.17-10-017 also ordered the IOUs to serve the notice previously established for A.14-06-001 et al. to the R.13-09-011 service list, as A.14-06-001 et al. is now closed.

In Advice 5446-E, PG&E requested approval for cost recovery in the amount of \$890,000 to complete enhancements under two project work scopes. For the first work scope (Project No 1), PG&E requested \$610,000 to complete enhancements to existing systems and processes to support increasing volumes of CAISO locations submitted by DRPs into the CAISO Demand Response Registration System (DRRS) for review by PG&E in its utility distribution company (UDC) and load-serving entity (LSE) review roles. For the Project No 2 work scope, PG&E requested \$280,000 to complete a set of enhancements to internal systems and tools supporting other aspects of Rule 24 program administration to scale with the increase in Rule 24 data sharing authorizations associated with the growing volume of CAISO locations. PG&E completed the deployment of all IT work scope items and completed post-deployment stabilization activities. The one remaining item to be completed is performance/stress testing of the Rule 24 and Share My Data IT systems and processes, as described below.

The IT work scope was deployed in two phases. The first release occurred on November 3, 2020 for the automated generation and distribution of the LSE report. All other work scope items were deployed on December 9. The project stabilization period closed on January 15, 2021. Total project costs are estimated at \$1,046,000, resulting in PG&E exceeding the Commission authorized funding level for this project by \$156,000. PG&E requests approval to shift funds from the Beyond Intermediate Step budget authorization in the amount of \$156,000 to cover the unanticipated work activities that were not included in PG&E's initial project cost estimate as set forth in Advice 5446-E. Those unanticipated costs are described below under Project 1.

Project 1

PG&E estimates that it requires \$772,000 in costs for the Project 1 work scope, exceeding the authorized budget amount of \$610,000 by \$162,000, or 26.6% of the authorized budget. See Table 1 below.

Table 1

	Project #1	Figures are rounded to closest thousand
a	Original Authorized Amount	\$ 610,000
b	Actual Costs	\$ 772,000
c	Amount Over Budget(a-b)	\$ (162,000)

Project No 1 costs are estimated to exceed the previously authorized amount for several reasons. First, the overall systems testing effort for Project No 1 was much larger than was originally estimated due to the complexity of the systems involved and the large number of sequential steps and hands-offs that take place from one process to the next. Each individual process and hand-off sequence needed to be tested in addition to end-to-end testing, resulting in a very large number of test cases to be conducted and validated before project release. Additionally, during the course of this project, PG&E's IT department implemented enhanced cybersecurity testing for IT projects involving

customer data. This enhanced cybersecurity testing was implemented in 2020 to keep pace with industry standards. This additional cybersecurity testing was not factored into the original cost estimate. Third, the IT team encountered unanticipated issues during the process of connecting to lower environments (non-production environments) for testing new and modified functionality. Fourth, PG&E believes it is prudent to stress test the deployment to understand the performance of the affected systems at higher volumes. As part of the project work, PG&E's IT team conducted performance testing to verify that the recently enhanced Rule 24 systems can handle a volume of 200,000 CAISO locations. However, that testing did not include stress testing to identify limitations for supporting a significantly larger volume of CAISO locations. Such stress testing of current systems and processes is needed in the near term given OhmConnect's December 7, 2020 public announcement about its project with Sidewalk Investment Partners for a 550 MW demand response resource.¹⁸ Further, other DR stakeholders have conveyed plans to accelerate the installation of smart thermostats, potentially numbering into 100,000 by September 1, 2021.¹⁹ The enormous scale of the OhmConnect project alone requires that PG&E perform systematic stress testing to pin-point system constraints at significant larger volumes. The findings from the stress testing will help PG&E identify further IT systems enhancements to meet the projected program growth. This work results in additional labor hours that were not factored in the original funding request.

As a result of the more expansive testing activity required for the project, the deployment took place in early December instead of the project's earlier planned release in the September timeframe, resulting in additional labor costs to finish the testing phase, complete pre-deployment planning and cover project stabilization through January 15, 2021. PG&E is planning to commence the IT systems stress testing in the first half of 2021. The testing is expected to take three to four months to complete.

Project 2

PG&E incurred \$274,000 in costs for the Project 2 work scope, resulting in a remaining balance of \$6,000 from the previously authorized total amount of \$280,000. See Table 2 below.

¹⁸ Press release:

https://assets.website-files.com/53cda9eccbc8e0894bcf7766/5fce6f871f4224502c080707_news-sip-ohmconnect-press-release-12.07.2020.pdf ("The 550 MW Resi-Station project will be funded by SIP and developed in partnership with OhmConnect and will comprise hundreds of thousands of actively engaged customers with a fleet of in-home smart devices delivering targeted energy reductions...[¶] In order to scale up Resi-Station and provide savings to California residents, SIP and OhmConnect are partnering with Google to offer Nest thermostats to hundreds of thousands of participants...").

¹⁹ *Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Reliable Electric Service in California in the Event of an Extreme Weather Event in 2021*, R.20-11-003, DR Coalition January 11, 2021 testimony, p. 5 lines 3-7, and DR Coalition Opening Brief, p. iii and p. 11 (February 5, 2021).

Table 2

	Project #2	Figures are rounded to closest thousand
a	Original Authorized Amount	\$ 280,000
b	Actual Costs	\$ 274,000
c	Amount Under Budget(a - b)	\$ 6,000

Project No 2 scope items were released via two deployments. The automation of the Load Serving Entity report was deployed on November 4, 2020 and all other scope items were released in conjunction with Project No 1 scope items on December 9. Post-deployment stabilization activities were completed January 15, 2021.

Next Steps and Recommendation for a CPUC-Led Workshop

PG&E recommends the Commission initiate a workshop with stakeholders to discuss and determine appropriate capacities for Rule 24 expansion. PG&E believes that the Commission should lead a process to evaluate third party forecasts and determine the appropriate capacity for expansion, and what would be reasonable associated costs for PG&E's customers to bear.

More specifically, PG&E seeks a public forum for third parties to provide information about their expected demands for Rule 24 registrations to inform future increases in scale for Rule 24 and Share My Data systems. PG&E has received growth forecasts from one DRP as well as an anecdotal statement from another DRP, both of which may be commercially sensitive for the DRP(s) and subject to change. Further, the opportunity for non-IOU Load Serving Entities (LSE) to use DR to meet their RA obligations up to the 8.3 percent cap established in Decision 20-06-031 also implies increased demand for Rule 24 registrations by DRPs serving non-IOU LSEs. Therefore, PG&E and the Commission need a process to gather information from stakeholders which PG&E and the Commission can rely upon to determine what should reasonably be done. PG&E notes that the history of Rule 24 involved Commission approval for stepped increases in capacity, starting with 10,000 registrations, followed by gradual increases to 40,000 registrations, 75,000 registrations, and finally 200,000 registrations, with the authorization to submit advice letters for cost recovery up to approximately \$6 million.²⁰ In order to increase the Rule 24 capacity beyond 200,000 registrations, which would start entering mass market levels, PG&E first needs an estimate of the increased Rule 24 registrations, approved by the Commission and upon which it can rely. A Commission-noticed workshop would be an appropriate forum to gather stakeholders without undue delay to address this question.

²⁰ D.17-06-005. This decision also permits PG&E to file an application for greater amounts. However, PG&E believes that it would be more efficient to utilize a workshop to develop a shared understanding of increased capacity needs, and the process for submitting the utility's resulting proposal and costs to the Commission for approval.

The workshop and subsequent process to establish the parameters and cost recovery for expansion of Rule 24/25 capacity could occur in a second phase of the Click-Through proceeding (A.18-11-015 et al) or a separate proceeding.

Cost Recovery

In accordance with the fund shifting flexibility granted in Resolution E-4983, which permits the shifting of funds between Project 1 and Project 2 work scopes, PG&E will be applying the available funds from Project 2 to cover a portion of the unanticipated costs for Project 1. This is detailed in Table 3 below.

Table 3

	Funding Requested	Figures are rounded to closest thousand
a	Project 1 Unanticipated Costs Amount	\$ (162,000)
b	Project 2 Under Spend Amount	\$ 6,000
c	Net Project Unanticipated Costs Amount (a+b)	\$ (156,000)

PG&E submits this Tier 3 advice letter seeking cost recovery of a total of \$156,000 to cover the additional costs associated with the successful completion of the project work scope as described herein. PG&E seeks to utilize unspent funds from existing cost recovery originally approved for PG&E's 75,000 Rule 24 registration capacity level project (known as the Beyond Intermediate Implementation Step) to support this project. Sufficient funds are available under the \$1.914 million approved in Resolution E-4837 to support this \$156,000 budget proposal.

PG&E believes that using unspent funds from the \$1.914 million is an appropriate way to resolve the \$156,000 recovery requested in this advice letter. However, PG&E is also open to an alternative approach to recover the costs from the \$10.39 million budget cap approved in D.16-06-008, as modified by D.17-06-005, OP 13. PG&E has previously requested a) \$1.914 million to support up to 75,000 Rule 24 registrations,²¹ b) \$1.971 million to support costs to modify the CISR-DRP Form and expand the Rule 24 data set,²² c) \$430,600 to fund the performance metrics project,²³ and d) \$890,000 to support up to 200,000 Rule 24 registrations.²⁴ Adequate funds remain to support the incremental

²¹ PG&E submitted Advice 5014-E, and the Commission approved it in Resolution E-4837.

²² PG&E submitted Advice 5165-E, and the Commission approved it in Resolution E-4912.

²³ PG&E submitted Advice 5190-E and supplemented it with Advice 5190-E-A, and the Commission approved it in Resolution E-4974.

²⁴ PG&E submitted Advice 5446-E, and the Commission approved it in Resolution E-4983.

funding requested in this advice letter under this \$10.39 million cap if the Commission prefers an authorization for new funds.

Conclusion and Relief Requested

PG&E requests approval to utilize unspent funds from the Beyond Intermediate Step budget authorization in the amount of \$156,000 to recover additional costs associated with the Project 1 work scope. PG&E urges the Commission to provide timely approval of this advice letter so that cost recovery can more closely align with the expenses incurred for project completion.

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 May 6, 2021, which is 20 days after the date of this submittal. Protests must be submitted to:

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

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

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

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

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

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

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

Effective Date

PG&E requests that this Tier 3 advice submittal become effective upon Commission approval.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.13-09-011 and A.14-06-001. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.13-09-011 and A.14-06-001



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 U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 6165-E

Tier Designation: 3

Subject of AL: Request for Approval of Additional Cost Recovery Associated with the Successful Deployment of IT Project Work to Increase Electric Rule 24 Registration Capacity to 200,000 Locations

Keywords (choose from CPUC listing): Rule

AL Type: Monthly Quarterly Annual One-Time Other:

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

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

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

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date:

No. of tariff sheets: N/A

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:

**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
Sempra Utilities

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

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