

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE



January 12, 2022

**Advice Letters 6179-E and 6179-EA**

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 (Q1, 2021).**

Dear Mr. Jacobson:

Advice Letters 6179-E and 6179-EA are effective as of May 30, 2021.

Sincerely

A handwritten signature in black ink, appearing to read "Simon Baker".

Simon Baker  
Interim Deputy Executive Director for Energy & Climate Policy / Interim Director, Energy Division



**Sidney Dietz**  
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 30, 2021

**Advice 6179-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Procurement Transaction Quarterly Compliance Submittal (Q1, 2021)**

**Purpose**

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) its compliance submittal for Q1 2021 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 January 1, 2021 through March 31, 2021, (Q1, 2021) 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: Q1 2021 Electric and Natural Gas Transactions
- Attachment B: Q1 2021 Counterparty Information
- Attachment C: Q1 2021 Electric Transactions Summary
- Attachment D: Q1 2021 Natural Gas Transactions Summary

Attachment E:	Q1 2021 Other Transactions
Attachment F:	Q1 2021 Key Briefing Packages
Attachment G:	Q1 2021 Independent Evaluator (IE) Reports
Attachment H:	Q1 2021 Contracts Executed/Contracts Amended
Attachment I:	Q1 2021 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:	Q1 2021 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 May 20, 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, 4<sup>th</sup> 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:

Sidney Dietz  
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 May 30, 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/

Sidney Dietz  
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) #: 6179-E

Tier Designation: 2

Subject of AL: Procurement Transaction Quarterly Compliance Submittal (Q1, 2021)

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: 5/30/21 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 proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Sidney Dietz, 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](mailto:PGETariffs@pge.com)

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

Advice 6179-E  
April 30, 2021

# **Attachment 1**

Narrative

**PACIFIC GAS AND ELECTRIC COMPANY**  
**PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT**  
**FOR THE FIRST QUARTER OF 2021**

**April 30, 2021**

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## **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 January 1, 2021 through March 31, 2021 (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) 5905-E: Updates to Procurement Products (Appendix A), Procurement Processes and Methods (Appendix B), and Sale Framework (Appendix S), submitted August 5, 2020 was approved with Resolution E-5109 on February 11, 2021.
- AL 5985-E: Request to Extend Procurement Authority Pursuant to PG&E's Assembly Bill (AB) 57 BPP, submitted October 29, 2020 was approved with Resolution E-5129 on March 18, 2021.
- AL 6021-E: Updates to Procurement Processes and Methods (Appendix B); and Brokerages and Exchanges (Appendix J), submitted December 8, 2020 was approved January 7, 2021.
- AL 6024-E: Notification of PG&E's BPP, Implementation of its Electric Portfolio Hedging Plan, submitted December 11, 2020 was accepted January 6, 2021.
- AL 6029-E: Update to Greenhouse Gas (GHG) Procurement Limits (Appendix C), effective December 21, 2020.
- AL 6051-E: Updates to Electric Portfolio Hedging Plan, submitted January 8, 2021.
- AL 6086-E: Conformed Bundled Procurement Plan Compliance Submittal Pursuant to Resolution E-5111 (Appendix P) effective February 11, 2021.

## **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), ongoing
- c. Solar in Disadvantaged Communities Solicitation (issued October 15, 2020)
- d. Winter 2020 Bundled RPS Energy Renewable Energy Credit/Certificates (REC) Solicitation (issued December 15, 2020)
- e. PG&E Summer 2021/2022 Capacity Procurement (issued December 29, 2020)
- f. 2021 Distribution Investment Deferral Framework RFO (issued January 11, 2021)
- g. PG&E Summer 2022 Expedited Procurement (issued February 16, 2021)

### **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
- 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. *Carbon Free Energy Sales*
- viii. *Transparent Exchange*

**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. Hydro Sierra Energy LLC: Pursuant to Qualifying Facility/Combined Heat and Power (QF/CHP) Settlement<sup>1</sup>, PG&E executed an extension to its Public Utility Regulatory Policies Act (PURPA) Power Purchase Agreement (PPA) with Hydro Sierra Energy LLC on January 29, 2021. Relevant information is included in the Informational Only section of Attachment H. Supplemental Advice Letter 5898-E-A was filed on February 2, 2021. The request for extension was made prior to expiration of the Settlement.

**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.

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<sup>1</sup> See Decision Adopting Proposed Settlement, D.10-12-035.

**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
- Carbon Free Energy Sales
- 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 January 2021, February 2021, and March 2021, PG&E participated in the CAISO’s monthly CRR allocation processes to procure CRRs for February 2021, March 2021, and April 2021, respectively.

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 March 31, 2021, 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) System, Flexible RA purchase transactions; (2) System RA purchase transactions; (3) Local Flexible RA purchase transactions; (4) Local RA purchase transactions and (5) 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 a firm energy transaction at selected import delivery locations. Relevant information is included in Confidential Attachment A.

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

  - PG&E conducted one E-Solicitation for RA and Import Energy transactions during the quarter: PG&E RA and Import Energy E-Solicitation (a.k.a. 2021 Balance of Year) which was monitored by an IE. In addition, PG&E executed transactions from the Q4 2020 RA and Import Energy Electronic Solicitation during the Quarter. Relevant information is included in Confidential Attachment G.

- Carbon Free Energy Sales – During the Quarter, PG&E executed transactions associated with its offer of 2021 Carbon Free Energy Sales to eligible LSEs in accordance with its CPUC BPP, Appendix P. 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 executed 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 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
- 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 6024-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.

- 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 2021 year from the California Air Resources Board (CARB) in September 2020. All of the EDU allowances will be consigned into the 2021 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 February 17, 2021, for Current 2021 Vintage and Advance 2024 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 December 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 Q1 2021***

PG&E received 57 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 five planned outages lasting longer than 72 hours during the Quarter. Three of these outages were for generator work and tunnel repairs on Helms Unit 1 (404 MW), Helms Unit 2 (404 MW), and Helms Unit 3 (404 MW) extended from the previous Quarter. In addition, there were two other planned outages on Helms Unit 2 (404 MW) and Helms Unit 3 (404

MW) during the Quarter. There were no maintenance outages at Helms during the Quarter lasting longer than 72 hours. Lastly, there were two forced outage events at Helms Unit 1 (404 MW) and Helms Unit 3 (404 MW) lasting 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: Belden (125 MW), Bucks Creek Units 1 and Unit 2 (55 MW, total), Caribou 1 Unit 1, Unit 2 and Unit 3 (75 MW, total), Drum 1 Unit 1, Unit 2, Unit 3 and Unit 4 (54 MW, total), Electra Unit 1, Unit 2, and Unit 3 (98 MW total), Kerckhoff 2 Unit 1 (155 MW), Kings River (52 MW), Pit 1 Unit 1 (30.5 MW), Pit 4 Unit 1 and Unit 2 (95 MW, total), Pit 5 Unit 4 (40 MW), and Poe Unit 1 and Unit 2 (120 MW, total). Four of the planned outages carried over from the previous Quarter, Buck Creek Unit 1 and Unit 2 (55 MW, total), Electra Unit 2 (31 MW), and Pit 1 Unit 1 (30.5 MW), and eight outages at Bucks Creek Unit 1 and Unit 2 (65 MW, total), Caribou 1 Unit 1 (25 MW), Electra Unit 2 (31 MW), Kerckhoff 2 Unit 1 (155 MW), Pit 1 Unit 1 (30.5 MW), and Pit 4 Unit 1 and Unit 2 (95 MW, total) will continue into the second Quarter of 2021. In addition, there were seven maintenance outages lasting longer than 72 hours: Haas Unit 1 and Unit 2 (144 MW, total), Pit 5 Unit 1 and Unit 2 (80 MW, total), and Tiger Creek Unit 1 and Unit 2 (58 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: Salt Springs Unit 1 and Unit 2 (44 MW, total), Stanislaus (91 MW), and Tiger Creek Unit 2 (29 MW).

At PG&E's fossil combined cycle facilities there was one planned outage longer than 72 hours during the Quarter at Colusa Generating Station (657 MW). There were no maintenance outages longer than 72 hours for the Quarter. Lastly, there were no forced outages greater than 24 hours during the Quarter.

At PG&E's Humboldt Bay Generating Station there were two planned outages longer than 72 hours during the Quarter. One outage was extended due to the

pandemic from the previous Quarter on Engine 4 and the other outage was a major overhaul on Engine 1. There were four maintenance outages lasting longer than 72 hours during the Quarter on Unit 6, Unit 7, Unit 9, and Unit 10. There were three forced outages event at Humboldt Bay Generating Station lasting longer than 24 hours during the Quarter on Unit 2, Unit 5, and Unit 7.

During First Quarter 2021, Diablo Canyon Power Plant (DCPP) Unit 1 operated at 99.14 percent capacity factor. Unit 1 ran the duration of the quarter at full power with no curtailments or outages occurring.

During First Quarter 2021, DCPP Unit 2 operated at 20.43 percent capacity factor. Two generation-impacting events occurred during the first quarter. During January, Unit 2 experienced a forced outage to perform maintenance on hydrogen piping inside the main generator. In February and March, a maintenance outage was scheduled to perform maintenance on the hydrogen piping inside the main generator and the unit was kept out of service to perform a refueling outage.

**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 executed ten Letter Agreements for Additional Energy with the following counterparties: Sierra Pacific Industries, Western Power & Steam, Inc.,

Wheelabrator Shasta Energy Company Inc., Crocket Cogeneration, and Chevron U.S.A, Inc. The Letter Agreements allow PG&E to call on resources for incremental energy upon CAISO's communicated request for additional energy due to anticipated or declared System Emergency. In addition, PG&E executed two agreements for Firm Forward Imported Energy with Calpine and TransAlta. These Letter Agreements and Firm Forward Imported Energy agreements are eligible for CAM cost recovery because they conform to the parameters outlined in the D.21-02-028 from the Rulemaking 20-11-003.

Advice 6179-E  
April 30, 2021

## **Attachment 2**

Attachment G-1 (Public Version)



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

PREPARED FOR PACIFIC GAS & ELECTRIC

January 2021

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Cover photo: Frank Schulenberg

# 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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Advice 6179-E  
April 30, 2021

## **Attachment 3**

Attachment G-2 (Public Version)



# APRIL – DECEMBER 2021 RESOURCE ADEQUACY AND IMPORT ENERGY ELECTRONIC SOLICITATION INDEPENDENT EVALUATOR REPORT

PREPARED FOR PACIFIC GAS & ELECTRIC

March 2021

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Cover photo: Frank Schulenberg

# INDEPENDENT EVALUATOR REPORT

PA Consulting Group, Inc. (PA) served as the Independent Evaluator for the Pacific Gas and Electric Company (PG&E) 2021 April-December Resource Adequacy and Import Energy Electronic Solicitation (2021 Apr-Dec RA and Import Energy Electronic Solicitation or the E-Solicitation). This report provides a summary of PA's evaluation of the process from the drafting of the E-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 the E-Solicitation

In this E-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 April 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 April 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 April through December 2021 delivery periods, and for Local RA with April through December 2021 delivery periods, with PG&E noting that it would also consider offers to sell PG&E Local RA for 2022 deliveries. 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 E-Solicitation.

**Table 1. E-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	Apr-Dec 2021	Fixed Price \$/kW-month
2	Local RA	Buy	1 MW	Apr-Dec 2021*	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Apr-Dec 2021	Fixed Price \$/kW-month
4	Import Energy	Buy	5 MW	Apr-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

\* PG&E also indicated that it would consider proposals to sell Local RA to PG&E for 2022

PG&E received [REDACTED] to the E-Solicitation and contracted for [REDACTED]  
 [REDACTED] PG&E received [REDACTED] IAR [REDACTED] to the E-Solicitation and contracted for [REDACTED] PG&E  
 received four IE [REDACTED] to the E-Solicitation and contracted for [REDACTED]

## Main Independent Evaluator Activities During the E-solicitation

PA's role in PG&E's 2021 Apr-Dec RA and Import Energy Electronic Solicitation spanned approximately three months in January through March 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 E-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 E-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 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.
- PA participated in several conference calls with the PG&E team to discuss specific offers and PG&E's treatment of them.

## Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices to PG&E's RA E-Solicitation distribution list of approximately 530 email addresses. PG&E has conducted multiple RA and related solicitations in the last several years and has continually added to its E-Solicitation distribution list. PA notes that in each successive solicitation, it has seen new counterparties who have not participated in PG&E's solicitations before and believes that PG&E extended adequate outreach for the 2021 Apr-Dec RA and Import Energy Electronic 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.

PA discussed the RA supply curve PG&E uses to evaluate offers. PG&E provided the revised supply curve to PA and PA reviewed it and found it reasonable. PA found PG&E's bid/offer evaluation methodology appropriate for this E-Solicitation.

## PG&E's Shortlisting and Negotiations of Confirms

The Market Notice for this E-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



PG&E's team has held several conference calls with PA to explain these issues and ensure that PA has a clear understanding of issues related to each counterparty and offers. PA feels that the PG&E team has made strong efforts to handle the challenging timelines of these transactions and to keep PA informed of the status of each transaction.

- 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 Apr-Dec RA and Import Energy Electronic Solicitation fairly.



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Advice 6179-E  
April 30, 2021

## **Attachment 4**

Attachment H (Public Version)

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q1 2021**

**New Contracts Executed 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.

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Local Area</b>	<b>Term</b>	<b>Volume (MW)</b>	<b>Price (kW-mo)</b>	<b>Notional Value (\$)</b>	<b>Confirm File Name</b>
None for the Quarter								

**Confidential Attachment H  
 Pacific Gas and Electric Company  
 Procurement Transaction Quarterly Compliance Report  
 Q1 2021**

**New Contracts Executed During 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 (MW)	Price (kW-mo)	Notional Value (\$)	Confirm File Name
CCSF, acting by and thru its PUC, CleanPowerSF (33B243T04)	1/6/2021	Local RA (Sale)			4			Q1 2021 E-Solicitation
					6			
Western Community Energy (33B265T01)	1/25/2021	System RA (Sale)	N/A		46			Q1 2021 E-Solicitation
CCSF, acting by and thru its PUC, Power Enterprise (33B250T03)	2/10/2021	Local RA (Sale)			13			Q1 2021 E-Solicitation
					13			
					36			
		Local, Flexible RA (Sale)			11			
CCSF, acting by and thru its PUC, CleanPowerSF (33B243T05)	2/10/2021	Local RA (Sale)			3			Q1 2021 E-Solicitation
Direct Energy Business Marketing, LLC (33B241T02)	2/10/2021	Local RA (Sale)			1			Q1 2021 E-Solicitation
Peninsula Clean Energy Authority (33B232T03)	2/10/2021	System RA (Sale)	N/A		10			Q1 2021 E-Solicitation
Shell Energy North America (US), L.P. (33B022T03)	2/10/2021	Import Allocation Rights (Sale)	N/A		75			Q1 2021 E-Solicitation

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW)	Price (kW-mo)	Notional Value (\$)	Confirm File Name
EDF Trading North America, LLC (33B200T01)	2/11/2021	Local RA (Sale)	[REDACTED]	[REDACTED]	25	[REDACTED]	[REDACTED]	Q1 2021 E-Solicitation
					5			
					25			
					5			
					25			
					5			
					25			
					5			
					35			
					25			
					5			
EDF Trading North America, LLC (33B200T02)	2/12/2021	Local RA (Sale)	[REDACTED]	[REDACTED]	30	[REDACTED]	[REDACTED]	Q1 2021 E-Solicitation
					5			
					5			

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q1 2021**

**New Contracts Executed During the Quarter**

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.

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Local Area</b>	<b>Term</b>	<b>Volume (MW)</b>	<b>Price (kW-mo) or (MW-day)</b>	<b>Notional Value (\$)</b>	<b>Confirm File Name</b>
Western Community Energy (33B265T02)	2/10/2021	System RA (Purchase)	N/A		50			Q1 2021 Broker
Calpine Energy Services, L.P. (33B029T03)	2/10/2021	System, Flexible RA (Purchase)	N/A		21			Q1 2021 Broker
Southern California Edison Company (33B217T13)	2/10/2021	Local RA (Purchase)			52			Q1 2021 Bilateral
		Local, Flexible RA (Purchase)			130			
Southern California Edison Company (33B217T14)	2/10/2021	System RA (Sale)	N/A		52			Q1 2021 Bilateral
		System RA (Sale)	N/A		130			
ConocoPhillips Company (33B249T01)	2/11/2021	System RA (Purchase)	N/A		68			Q1 2021 Broker
ConocoPhillips Company (33B249T02)	2/11/2021	System RA (Purchase)	N/A		12			Q1 2021 Broker

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW)	Price (kW-mo) or (MW-day)	Notional Value (\$)	Confirm File Name
EDF Trading North America, LLC (33B200T03)	3/5/2021	System RA (Sale)	N/A		245			Q1 2021 Bilateral
					245			
					245			
					245			
					245			
					245			
					245			
					245			
					245			
					245			
					245			
					245			
					290			
					290			
290								
290								
290								
290								
Clean Power Alliance of Southern California (33B240T02)	3/11/2021	System RA (Purchase)	N/A		180			Q1 2021 Bilateral
Calpine Energy Services, L.P. (33B029T04)	3/12/2021	System RA (Purchase)	N/A		12			Q1 2021 Broker
Saavi Energy Solutions, LLC (33B266T01)	3/15/2021	System RA (Sale)	N/A		120			Q1 2021 Bilateral
					120			
					120			
					120			
					120			

**Confidential Attachment H  
 Pacific Gas and Electric Company  
 Procurement Transaction Quarterly Compliance Report  
 Q1 2021**

**New Contracts Executed During the Quarter**

The table below provides a summary of Carbon Free Energy Contracts 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. Carbon Free Energy is energy produced by large hydroelectric resources and nuclear resources and sold to eligible Load Serving Entities (LSEs).<sup>1</sup>

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio <sup>2</sup>	Net Price <sup>3</sup>	Notional Value	Confirm File Name
Calpine Energy Solutions, LLC (33B211CA02)	1/28/2021	Carbon Free Energy (Sale)		Feb-21		\$0	\$0	Q1 2021 Carbon Free Energy
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				
				CCSF, acting by and thru its PUC, CleanPowerSF (33B243CA02)				
Mar-21								
Apr-21								
May-21								
Jun-21								
Jul-21								
Aug-21								
Sep-21								
Oct-21								
Nov-21								
Dec-21								
Central Coast Community Energy (33B236CA03)	1/28/2021	Carbon Free Energy (Sale)			Feb-21		\$0	\$0
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio <sup>2</sup>	Net Price <sup>3</sup>	Notional Value	Confirm File Name
Commercial Energy of Montana Inc. (33B202CA02)	1/28/2021	Carbon Free Energy (Sale)		Feb-21		\$0	\$0	Q1 2021 Carbon Free Energy
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				
				Direct Energy Business, LLC (33B255CA02)				
Mar-21								
Apr-21								
May-21								
Jun-21								
Jul-21								
Aug-21								
Sep-21								
Oct-21								
Nov-21								
Dec-21								
East Bay Community Energy Authority (33B238CA03)	1/28/2021	Carbon Free Energy (Sale)			Feb-21		\$0	\$0
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				
				King City Community Power (33B257CA02)	1/28/2021			
Mar-21								
Apr-21								
May-21								
Jun-21								
Jul-21								
Aug-21								
Sep-21								
Oct-21								
Nov-21								
Dec-21								

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio <sup>2</sup>	Net Price <sup>3</sup>	Notional Value	Confirm File Name
Marin Clean Energy (33B235CA02)	1/28/2021	Carbon Free Energy (Sale)		Feb-21		\$0	\$0	Q1 2021 Carbon Free Energy
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				
				Peninsula Clean Energy Authority (33B232CA02)				
Mar-21								
Apr-21								
May-21								
Jun-21								
Jul-21								
Aug-21								
Sep-21								
Oct-21								
Nov-21								
Dec-21								
Pilot Power Group, LLC (33B239CA02)	1/28/2021	Carbon Free Energy (Sale)			Feb-21		\$0	\$0
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				
				Pioneer Community Energy (33B245CA02)	1/28/2021			
Mar-21								
Apr-21								
May-21								
Jun-21								
Jul-21								
Aug-21								
Sep-21								
Oct-21								
Nov-21								
Dec-21								

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio <sup>2</sup>	Net Price <sup>3</sup>	Notional Value	Confirm File Name
Redwood Coast Energy Authority (33B259CA02)	1/28/2021	Carbon Free Energy (Sale)		Feb-21		\$0	\$0	Q1 2021 Carbon Free Energy
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				
				Shell Energy North America (US), L.P. (33B022CA02)				
Mar-21								
Apr-21								
May-21								
Jun-21								
Jul-21								
Aug-21								
Sep-21								
Oct-21								
Nov-21								
Dec-21								
Silicon Valley Clean Energy Authority (33B230CA02)	1/28/2021	Carbon Free Energy (Sale)			Feb-21		\$0	\$0
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				
				The Regents of the University of California (33B261CA02)	1/28/2021			
Mar-21								
Apr-21								
May-21								
Jun-21								
Jul-21								
Aug-21								
Sep-21								
Oct-21								
Nov-21								
Dec-21								

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio <sup>2</sup>	Net Price <sup>3</sup>	Notional Value	Confirm File Name
Valley Clean Energy Alliance (33B254CA02)	1/28/2021	Carbon Free Energy (Sale)		Feb-21		\$0	\$0	Q1 2021 Carbon Free Energy
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				
				San Jose Clean Energy (33B247CA02)				
Mar-21								
Apr-21								
May-21								
Jun-21								
Jul-21								
Aug-21								
Sep-21								
Oct-21								
Nov-21								
Dec-21								
Sonoma Clean Power Authority (33B226CA02)	1/29/2021	Carbon Free Energy (Sale)			Feb-21		\$0	\$0
				Mar-21				
				Apr-21				
				May-21				
				Jun-21				
				Jul-21				
				Aug-21				
				Sep-21				
				Oct-21				
				Nov-21				
				Dec-21				

<sup>1</sup> PG&E BPP Advice Letter 5705-E, submitted December 2, 2019, and approved on May 13, 2020, created Appendix P Carbon Free Energy. BPP Appendix P was updated with Advice Letter 5930-E, approved by Res E-5111 on December 17, 2020 and AL 6086-E approved on March 12, 2021.

<sup>2</sup> Monthly percentage of the Buyer's PCIA Load Share.

<sup>3</sup> Price nets to zero because eligible LSEs pay for these MWhs through PCIA and PG&E is retaining all CAISO revenues.

**Confidential Attachment H  
 Pacific Gas and Electric Company  
 Procurement Transaction Quarterly Compliance Report  
 Q1 2021**

**New Contracts Executed and Amended During the Quarter**

**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:

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Type of Transaction</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
Hydro Sierra Energy LLC (12H010QPA)	1/29/2021	PURPA	5 months	Extension Agreement	2/2/2021	Advice Letter 5898-E-A
Chevron U.S.A. (Eastridge) (25C248)	2/12/2021	QF	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
Chevron U.S.A. (SE Kern River) (25C246)	2/12/2021	QF	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
Western Power and Steam II (25C138QPA)	2/12/2021	PURPA	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
Chevron U.S.A. (Coalinga) (25C055)	2/12/2021	QF	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
Chevron U.S.A. (Cymric) (25C003)	2/12/2021	QF	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
Chevron U.S.A. (Taft/Cadet)(25C002)	2/12/2021	QF	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
Crockett Cogeneration (01C045)	2/12/2021	QF	9 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q1 2021**

**New Contracts Executed and Amended During the Quarter**

**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:

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Type of Transaction</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
Humboldt Bay Generating Station (Transport ID: 7070030)	1/21/2021	G-EG.NEG rate	23 months	Switch from G.EG rate to G-EG.NEG rate	11/1/2006	Advice Letter 2784-G
Western Community Energy (33B265)	1/22/2021	EEL Master	N/A	Contract	N/A	2021 ERRA Compliance Filing
East Bay Community Energy Authority (33R497)	2/2/2021	RPS Energy REC Sales	1 year	Contract	3/19/2021	Advice Letter 6122-E
Silicon Valley Clean Energy Authority (33R496)	2/2/2021	RPS Energy REC Sales	1 year	Contract	3/19/2021	Advice Letter 6122-E
Central Coast Community Energy (33R498)	2/3/2021	RPS Energy REC Sales	1 year	Contract	3/19/2021	Advice Letter 6122-E
Fresno Disadvantaged Community Solar Project (33R499)	2/4/2021	DAC-GT	20 years	Contract	N/A	Advice Letter pending
Wheelabrator Shasta (33R406)	2/12/2021	RPS	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
SPI Biomass Portfolio (33R254)	2/12/2021	RPS	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
Chevron U.S.A. (McKittrick) (24B001FHP)	2/12/2021	AB1613	5 months	Non-Routine Amendment to Existing Agreement	2/16/2021	Advice Letter 6088-E
Transalta (4900389)	2/12/2021	Import Energy	3 months	Transaction	2/16/2021	Advice Letter 6089-E
Calpine Energy (4900394)	2/12/2021	Import Energy	3 months	Transaction	2/16/2021	Advice Letter 6089-E
El Nido Biomass Facility (33R016)	3/10/2021	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2021 ERRA Compliance Filing

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Chowchilla Biomass Facility (33R017)	3/10/2021	RPS	N/A	Routine Amendment to Existing Agreement	N/A	2021 ERRR Compliance Filing
Beard (33R488)	3/12/2021	CS-GT	N/A	Consent to Assignment - General Consent	N/A	2021 ERRR Compliance Filing
Rocha (33R489)	3/12/2021	CS-GT	N/A	Consent to Assignment - General Consent	N/A	2021 ERRR Compliance Filing
Gonzalez (33R490)	3/12/2021	CS-GT	N/A	Consent to Assignment - General Consent	N/A	2021 ERRR Compliance Filing
Highway 43 (33R491)	3/12/2021	DAC-GT	N/A	Consent to Assignment - General Consent	N/A	2021 ERRR Compliance Filing
Kern Sunset (33R492)	3/12/2021	DAC-GT	N/A	Consent to Assignment - General Consent	N/A	2021 ERRR Compliance Filing
Saavi Energy Solutions, LLC (33B266)	3/15/2021	EEl Master	N/A	Contract	N/A	2021 ERRR Compliance Filing
Tracy Desalination Project (33R500BIO)	3/16/2021	BioMAT	20 years	Contract	N/A	2021 ERRR Compliance Filing
Kings CSG 1 LLC (33R501)	3/16/2021	CS-GT	20 years	Contract	N/A	Advice Letter pending
Tulare CSG LLC (33R502)	3/16/2021	CS-GT	20 years	Contract	N/A	Advice Letter pending
Diablo Energy Storage, LLC (40S011)	3/24/2021	Energy Storage	N/A	Consent to Assignment - Financing	N/A	2021 ERRR Compliance Filing
Diablo Energy Storage, LLC (40S015)	3/24/2021	Energy Storage	N/A	Consent to Assignment - Financing	N/A	2021 ERRR Compliance Filing
Diablo Energy Storage, LLC (40S016)	3/24/2021	Energy Storage	N/A	Consent to Assignment - Financing	N/A	2021 ERRR Compliance Filing
Diablo Energy Storage, LLC (40S017)	3/24/2021	Energy Storage	N/A	Consent to Assignment - Financing	N/A	2021 ERRR Compliance Filing
Diablo Energy Storage, LLC (40S020)	3/24/2021	Energy Storage	N/A	Consent to Assignment - Financing	N/A	2021 ERRR Compliance Filing

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q1 2021**

**New Contracts Executed and Amended During the Quarter**

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

<b>Contract/ Counterparty Name</b>	<b>Termination or Expiration <sup>1</sup></b>	<b>Date</b>	<b>Product</b>	<b>Volume (MW)</b>
Orange Cove Irrigation Dist. (25H149QPA)	Expiration	2/28/2021	PURPA	0.475
mNOC AERS LLC (40S012)	Termination	3/5/2021	Energy Storage	10

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<sup>1</sup> A terminated contract is ended before its original expiration date. An expiration date is the nature end of the contract.

Advice 6179-E  
April 30, 2021

## **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 6179-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 April 30, 2021 Advice Letter 6179-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.06-06-066, 14-10-033, and/or Public Utilities Code Section 454.5(g). The matrix also specifies why



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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6179-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 April 30, 2021 Advice Letter 6179-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 April 30, 2021, at San Francisco, California.

*/s/*

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John Ulloa

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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6179-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 April 30, 2021 Advice Letter 6179-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 April 30, 2021, at San Francisco, California.

\_\_\_\_\_  
/s/  
Marianne Aikawa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6179-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q1 2021  
 APRIL 30, 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
<b>Document: Quarterly Compliance Report</b>			
Confidential Attachment E, Q1 2021 GHG Materials folder:  File name: 05_PGE PRG PRES GHG Position Update_031621.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
Confidential Attachment F, Confid Attachment F Qtr01 2021 zip file:  File name: 05_PGE PRG PRES GHG Position Update_031621.pdf, "Market Data Review, GHG Dispatch Curve", page 4  Confidential Attachment F, Confid Attachment F, PRG Meeting Materials and Summaries, March 16, 2021 folder:  File name: PGE PRG PRES GHG Position Update_031621.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 6179-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q1 2021  
 APRIL 30, 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
<b>Document: Quarterly Compliance Report</b>			
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 6179-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q1 2021  
 APRIL 30, 2021**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

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<b>Document: Quarterly Compliance Report</b>			
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 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

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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.
Attachment E – in its entirety: Other Transactions (Electric Information) (Except Greenhouse Gas ("GHG") Information, which is presented separately below)	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;	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
	Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids		

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Attachment E – in its entirety: Other Transactions- (GHG Information)	D.14-10-033  Public Utilities Code Section 454.5(g)	<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&amp;E’s customers and put PG&amp;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&amp;E participated in California Air Resources Board (“CARB”) auctions and PG&amp;E’s net open position for GHG compliance.</p>	Indefinite
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&amp;E’s customers, and put PG&amp;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)

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Attachment F –in its entirety: PRG Material-GHG Information	D.14-10-033	Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.  For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.	Indefinite
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

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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;	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
	Item VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids		
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

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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)
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		
	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
	Item XI) Monthly Procurement Costs (Energy Resource Recover Accounts [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
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  
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