

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



**Pacific Gas & Electric Company  
ELC (Corp ID 39)  
Status of Advice Letter 6180E  
As of May 24, 2022**

Subject: Pacific Gas & Electric Company's Request for Funding Shifting Associated with its 2018-2022 Demand Response Funding Cycle

Division Assigned: Energy

Date Filed: 04-30-2021

Date to Calendar: 05-05-2021

Authorizing Documents: None

**Disposition:**

**Signed**

**Effective Date:**

**05-19-2022**

Resolution Required: Yes

Resolution Number: E-5181

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Annie Ho

415-973-8794

[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**

April 30, 2021

**Advice 6180-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Pacific Gas & Electric Company's Request for Funding Shifting  
Associated with its 2018-2022 Demand Response Funding Cycle**

**Purpose**

Pursuant to California Public Utilities Commission (CPUC) Decision (D.) 20-05-009, Pacific Gas & Electric Company (PG&E) is submitting this Advice Letter to request approval to shift funds in order to meet the needs of the information technology (IT) budget for the demand response funding cycle covering 2018-2022.

**Background**

The CPUC issued D. 17-12-003, which among other things, adopted demand response activities and budgets for PG&E, Southern California Edison (SCE) and San Diego Gas & Electric Company (SDG&E) (collectively, the Utilities). D. 17-12-003 was the first decision under the extended five-year Demand Response (DR) term covering 2018 – 2022.

The CPUC issued D. 20-05-009 updating the fund shifting requirements pursuant to a Petition for Modification (PFM) of D. 17-12-003 filed on November 26, 2019 by SDG&E. While some level of fund shifting existed<sup>1</sup> prior to the PFM, D. 20-05-009 established a mechanism for shifting *between* budget categories<sup>2</sup> via a Tier 3 Advice Submittal. Specifically, D. 20-05-009 explained the CPUC's thinking on this matter on p. 7 of its decision:

*Given the new budget categories and the change to the length of the portfolio cycle, the Utilities may request to shift funds between categories via a Tier 3 advice letter, which allows for parties' comments and Commission review of such changes. While these opportunities fall outside of the current fund-shifting rules,*

---

<sup>1</sup> D.12-04-045, pp. 26-28 re-affirmed D.09-08-027.

<sup>2</sup> D.17-12-003, Attachment 3, adopted seven budget categories.

*they are reasonable under the current circumstances during the 2018-2022 demand response cycle. Some of the uncertainties in this 5-year cycle include the growth of activity by third party demand response providers and aggregators in the process of implementing full bifurcation, and ongoing changes being decided at the CAISO within the Energy Storage and Distributed Energy Resources (ESDER) stakeholder phases, among other activities which may make budget forecasting challenging for the complete 5 years.*

Furthermore, as a condition for fund shifting between budget categories, Ordering Paragraph (OP) 6 of D. 20-05-009, which was also added as OP 63 to D. 17-12-003, set forth the following information that had to be provided as part of a fund shifting request.

1) Why the amount is needed, 2) What categories are impacted (source category and recipient category), 3) Why the established rules are not adequate to accommodate the requested fund-shift at that time, 4) An accounting of the budget spent thus far on each demand response program within each affected category, 5) Explanation as to why the approved budget of the source category and programs will not be needed, 6) How a budget shift will not cause a detrimental effect on any affected demand response program, 7) How an increase or decrease in budget aligns with or deviates from the Commission's determination of the cost-effectiveness of the recipient and source programs, and 8) An updated program cost-effectiveness analysis.

## **Discussion**

### **Summary of Proposal**

PG&E's need to fund shift approximately \$10M (\$9,999,585) stems from additional costs associated with CAISO market integration, ongoing system and process support, along with technology upgrades that were not fully anticipated. The total shift in funding of approximately \$10M would be used to cover overspending in two sub-categories pertaining to IT spending within budget Category 7 titled "Portfolio Support."

The specific sub-categories within Category 7 are as follows:

- the IT sub-category for "Support for Market Activities" (\$5,846,713),
- the IT sub-category for "Support for Retail and Customer Facing Activities" (\$3,747,255).

The sum of these two sub-categories results in the need to shift \$9,999,585 (\$5,846,713 + \$3,747,255).<sup>3</sup>

---

<sup>3</sup> The approximate need for \$10M is based on the most current monthly budget as of the end of March 2021 with a forecasted spend projection through the end of the current funding cycle (2022). Depending on when this Advice Letter is approved by the CPUC, this estimate may need to be refreshed.

The proposed shift would come from Category 1, sub-category SmartAC (Administration) and Category 5, sub-category Supply Side Pilot.<sup>4</sup> The below table illustrates the proposed transfer *from* and transfer *to*.

<b>Table Summarizing Fund Shifting Request</b>				
<b>Amount to Transfer</b>	<b>From: Budget Category</b>	<b>From: Budget Sub-category</b>	<b>To: Budget Category</b>	<b>To: Budget Sub-category</b>
\$ 5,846,713 (a)	1 (Smart AC)	SmartAC (Administrative)	7 (Portfolio Support)	Support for Market Activities <sup>5</sup>
\$ 405,616 (a)(b)	5 (Pilots)	Supply Side Pilot (SSP)	7 (Portfolio Support)	Support for Market Activities
\$ 3,747,255 (b)	5 (Pilots)	Supply Side Pilot (SSP)	7 (Portfolio Support)	Support for Retail and Customer Facing Activities <sup>6</sup>
<b>\$ 9,999,585</b>	Grand Total			

(a)  $\$5,846,713 + \$405,616 = \$6,252,329$

The total amount to transfer to Category 7 (Support for Market Activities and for Retail and Customer Facing Activities).

(b)  $\$405,616 + \$3,747,255 = \$4,152,871$

The total amount to transfer from Category 5, SSP to Category 7 (Support for Market Activities and for Retail and Customer Facing Activities).

PG&E emphasizes there is urgency in the shifting of funds as based on the current spending trajectory, PG&E expects to run out of funding in 2021 for the following sub-

<sup>4</sup> PG&E proposes to split the Supply Side Pilot underspend of approximately \$4.2M between the Support for Market Activities (at \$405,616) and Support for Retail and Customer Facing Activities (at \$3,747,255).

<sup>5</sup> Support for Market Activities: Primarily focused on enabling DR programs to be “bid into” the CAISO’s wholesale market. Supporting functions include registration, bidding, dispatch and settlements (wholesale). These activities also include interfacing with external systems, such as the CAISO’s Demand Response Registration System and other external vendors supporting customers and aggregators.

<sup>6</sup> Support for Retail & Customer Facing Activities: Primarily focused on supporting the retail DR programs. Functions include enrollment, forecasting, dispatch, notification and settlements (retail). These activities also include interfacing with external systems to support both direct and Aggregator enrollment customers. A number of improvements have been made to both automate certain processes (e.g., electronic signatures) and simplify enrollments for residential participants of Aggregator programs.

categories under Category 7 of its 2018-2022 authorized budget adopted in D. 17-12-003.

- “Support for Market Activities” by the end of May 2021
- “Support for Retail and Customer Facing Activities” by end of December 2021

PG&E originally held off on making an earlier fund shifting request because it was unclear if some level of programmatic pivoting would have been needed as part of its mid-cycle filing.<sup>7</sup> More recently the budgetary uncertainty created by the initiation of the Summer Reliability Rulemaking (R. 20-11-003), and the subsequent issuance of D.21-03-056, clarified funding needs for the balance of the current 2018-2022 DR cycle. Now that external funding uncertainties appear to have been addressed, PG&E is able to proceed with the request for fund shifting.

### **Required Information**

#### **1) Why the amount is needed.**

The shift towards CAISO market integration necessitated greater access and usage of real-time data and the streamlining of previously disparate business processes and IT workflows. A new “Support for Market Activities” sub-category was created to support implementation of a new IT infrastructure. But the shift towards CAISO market integration also created additional and unanticipated business processing costs that necessitated incremental Full-Time Employees (FTEs). To illustrate, incremental FTEs were needed for additional coordination with both external (e.g., forecasting vendors) and internal (e.g., electric procurement front-office) parties. This is similar to a market trading shop that includes front-office (external interactions), mid-office (bidding) and back-office (settlements and reporting) functions.

To effectuate the move towards market integration, PG&E concluded that an overarching system to manage both market and retail/customer activities was necessary. PG&E stood up the *Demand Response Market Integration* (DRMI) IT platform in 2018 to support both activities under one umbrella. This pivot from two separate systems (one for market activities and another for retail/customer activities) towards one provided

---

<sup>7</sup> Advice Letter 5799-E (Link: [https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC\\_5799-E.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5799-E.pdf)). Guidance relates to potential mid-term modifications to the portfolio along with implementation of a retail 5 in 10 baseline for residential participants in CBP.

synergies that enhanced the program and operational management of DR. At the same time, the reliance on incumbent systems and processes supported by external vendors had to be phased out gradually based on risk mitigation and licensing commitments. As a result, PG&E was unable to quickly unwind certain costs. Lastly, the sheer complexity of market integration and the move to the DRMI system created a greater reliance on external consultants than anticipated, which increased costs.

All told, the complexity and sheer volume of system integration and business process work to facilitate CAISO market integration was under-estimated at the time the 2018-2022 Application was submitted. However, going forward PG&E believes that there will be greater control for system costs based on having “gotten over the hump” of CAISO market integration.

## 2) What categories are impacted (source category and recipient category).

The following table summarizes the “source” and “recipient” categories and related sub-categories.

From (source): Budget Category	From (source): Budget Sub-category	To (recipient): Budget Category	To (recipient): Budget Sub-category
1 (Smart AC)	SmartAC (Administration)	7 (Portfolio Support)	Support for Market Activities
5 (Pilots)	Supply Side Pilot	7 (Portfolio Support)	Support for Market Activities; Support for Retail and Customer Facing Activities

## 3) Why the established rules are not adequate to accommodate the requested fund-shift at that time.

Due to the approximate \$10M required to cover the IT spend short-fall, the only feasible option for covering this amount is to fund shift from different budget categories (i.e., Categories 1 and 5). While PG&E assessed the ability to potentially shift funds within the existing budget Category 7, there were either insufficient funds to enable fund shifting from other Category 7 items (i.e. sub-categories) or PG&E did not want to put at risk other sub-categories, which have less predictability in the spend rate between now and the end of the current funding cycle in 2022. Hence, the need to file a Tier 3 advice letter.<sup>8</sup>

<sup>8</sup> D. 20-05-009 clarified at p. 8: “The Utilities may continue to shift up to 50 percent of a program’s funds to another program within the same budget category, with proper monthly reporting, but not between the seven budget categories we adopt in this decision, unless a Tier 3 advice letter is submitted and approved. We continue to require that Utilities submit a Tier 2

#### 4) An accounting of the budget spent thus far on each demand response program within each affected category.

Funding Categories	2018 Actual	2018 Authorized	2019 Actual	2019 Authorized	2020 Actual	2020 Authorized	2021 Actual YTD (Through March)
<b>Category 1: Supply-Side DR Programs</b>							
AC Cycling: Smart AC							
Admin	\$ 4,906,619	\$ 5,759,000	\$ 2,924,042	\$ 5,759,000	\$ 2,168,406	\$ 5,759,000	\$ 580,950
Incentive	\$ 265,350	\$ 637,000	\$ 48,300	\$ 637,000	\$ 6,050	\$ 637,000	\$ 250
Base Interruptible Program (BIP)							
Admin	\$ 353,891	\$ 566,000	\$ 346,948	\$ 566,000	\$ 452,153	\$ 566,000	\$ 116,573
Incentive	\$ 26,000,982	\$ 31,780,000	\$ 23,050,535	\$ 31,780,000	\$ 19,200,741	\$ 31,780,000	\$ 5,047,443
Capacity Bidding Program (CBP)							
Admin	\$ 411,485	\$ 664,000	\$ 378,985	\$ 664,000	\$ 622,602	\$ 664,000	\$ 136,540
Incentive	\$ 1,612,847	\$ 3,439,000	\$ 1,264,338	\$ 3,439,000	\$ 1,864,325	\$ 3,439,000	\$ 40,400
<b>Category 1 Total</b>	<b>\$ 33,532,732</b>	<b>\$ 42,845,000</b>	<b>\$ 28,138,026</b>	<b>\$ 42,845,000</b>	<b>\$ 24,534,026</b>	<b>\$ 42,845,000</b>	<b>\$ 5,922,156</b>
<b>Category 5: Pilots</b>							
Supply Side Pilot	\$ 623,654	\$ 2,083,000	\$ 922,386	\$ 2,114,000	\$ 448,360	\$ 2,141,000	\$ 40,098
Excess Supply	\$ 615,802	\$ 596,000	\$ 501,497	\$ 605,000	\$ 384,337	\$ 612,000	\$ 34,030
Local Capacity Planning Areas and Disadvantaged Communities Pilot	\$ -	\$ 250,000	\$ 108,599	\$ 250,000	\$ 216,695	\$ 250,000	\$ 70,768
<b>Category 5 Total</b>	<b>\$ 1,239,455</b>	<b>\$ 2,929,000</b>	<b>\$ 1,532,482</b>	<b>\$ 2,969,000</b>	<b>\$ 1,049,392</b>	<b>\$ 3,003,000</b>	<b>\$ 144,896</b>
<b>Category 7: Portfolio Support (includes EM&amp;V, Systems Support, and Notifications)</b>							
DR Measurement and Evaluation (DRMEC)	\$ 828,811	\$ 3,233,000	\$ 1,392,672	\$ 3,262,000	\$ 1,436,437	\$ 2,133,000	\$ 393,192
DR Integration Policy & Planning	\$ 1,655,560	\$ 1,576,000	\$ 1,396,900	\$ 1,629,000	\$ 775,194	\$ 1,677,000	\$ 248,187
Support for Market Activities	\$ 2,574,481	\$ 3,791,000	\$ 4,709,669	\$ 2,331,000	\$ 4,086,658	\$ 2,398,000	\$ 931,923
Support for Retail & Customer Facing Activities	\$ 5,005,602	\$ 4,235,000	\$ 4,366,816	\$ 3,794,000	\$ 5,276,013	\$ 3,879,000	\$ 1,120,007
DR Potential Study	\$ -	\$ 400,000	\$ -	\$ 400,000	\$ -	\$ 400,000	\$ -
<b>Category 7 Total</b>	<b>\$ 10,064,454</b>	<b>\$ 13,235,000</b>	<b>\$ 11,866,056</b>	<b>\$ 11,416,000</b>	<b>\$ 11,574,303</b>	<b>\$ 10,487,000</b>	

#### 5) Explanation as to why the approved budget of the source category and programs will not be needed.

##### Supply Side Pilot

The original authorization for the Supply Side Pilot (SSP) was for three years (2018 - 2020) with the potential extension for 2021 and 2022 per CPUC authorization.<sup>9</sup> Because this extension was not authorized the SSP sunset at the end of 2020.<sup>10</sup> Other than a requirement for an independent evaluator (IE) to conduct an EM&V assessment per AL 5711-E by the end of September 2021, and support for this effort by the pilot administrator, there is no material ongoing activities occurring at this time. Therefore, the surplus funds for this pilot can be mostly redirected with minimal risk.<sup>11</sup>

##### SmartAC (Administration)

PG&E's assessment based on the current program needs indicate that a limited redirect of current funding can be made without materially impacting program administration. As discussed in PG&E's mid-cycle submittal (AL 5799-E), participation in SmartAC has declined for a number of reasons. Furthermore, as also discussed in AL 5799-E, replacement of legacy one-way switches to two-switches is cost prohibitive in the context of shrinking enrollment and participation. Consequently, PG&E believes the

---

AL before shifting more than 50 percent of a program's fund to a different program within the same budget category and follow the directives given in D.12-04-045. We recognize that changes may be necessary in this demand response cycle and allow for such changes to be filed via a Tier 3 advice letter."

<sup>9</sup> D.17-12-003, Ordering Paragraph (OP) 37.

<sup>10</sup> Id OP 37 stated that "In the mid-cycle review that will occur in 2020, should the Energy Division determine that the objectives of the pilots are not met and they should still be pursued, then the Energy Division shall authorized funding up to the original requested budget for years 2021 and 2022." PG&E filed its mid-cycle review via AL 5699-E on April 1, 2020. Since no disposition of AL 5699-E occurred prior to the end of 2020, PG&E's understanding is that this pilot (along with the Excess Supply Pilot) are closed effective December 31, 2020.

<sup>11</sup> The funding associated with the IE has been planned for under the existing "DR Measurement and Evaluation (DRMEC)" sub-category within the broader Category 7.

original five year budget will not be fully utilized and can be partially redirected for other needs.<sup>12</sup>

**6) How a budget shift will not cause a detrimental effect on any affected demand response program.**

Supply Side Pilot

As discussed in response to Q-5, the SSP sunset at the end of 2020 and the remaining funds of approximately \$4.2M can be mostly redirected with minimal risk<sup>13</sup>

SmartAC (administration)

As discussed in response to Q-5, a repurposing of approximately \$5.8 of *administrative* costs would not in PG&E's opinion have a detrimental impact on the operations of SmartAC based on the projected needs through the end of the funding cycle (2022).

The most current spend projection for SmartAC *administrative* costs would result in the spending of ~50% (\$14.4M) of the five-year authorized (\$28.8M) funds. Consequently, removal of \$5.8M would result in \$8.6M (\$14.4M - \$5.8M) of surplus funds remaining at the end of the current funding cycle (2022) based on current spending trajectory.

**7) How an increase or decrease in budget aligns with or deviates from the Commission's determination of the cost-effectiveness of the recipient and source programs.**

It needs to be noted that the SSP was a pilot, which does not have a Cost-Effectiveness (CE) requirement.<sup>14</sup> Second, the removal of costs from SmartAC, would increase CE with all else being equal because the key drivers for CE are load impact and budget.<sup>15</sup> Third, the increase in funding for IT work does not have a CE value as it's not a program cost per se. The following table illustrates the CE analysis as originally filed in PG&E's 2018-2022 funding Application.<sup>16</sup>

---

<sup>12</sup> This fund shifting request has considered potential modifications/enhancements that may be requested for the SmartAC program during the current funding cycle.

<sup>13</sup> It should be noted that of the approximate \$4.3M remaining under Category 5 for the Supply Side Pilot, PG&E plans to hold back \$150,000 to support the unwinding of the pilot resulting in \$4.2M available for fund shifting. This hold back is primarily for the pilot administrator to support the IE in completing the EM&V assessment, a requirement set forth by OP 39 of D.17-12-003 and detailed in AL 5711-E.

<sup>14</sup> 2016 Demand Response Cost Effectiveness Protocols at page 7.

<sup>15</sup> A reduction in the SmartAC administration budget is not expected to have a detrimental load impact based on current budgetary needs to support the program.

<sup>16</sup> A.17-12-003 at pp. 7-2 to 7-3. See Table 7-1 and Table 7-2.

<b>Cost-Effectiveness (Pre-Shift of Funds)</b>				
<b>Program or Portfolio</b>	<b>TRC (Total Ratepayer Cost)</b>	<b>RIM (Ratepayer Impact Measure)</b>	<b>PAC (Program Administrator Cost)</b>	<b>PCT (Participant Cost Test)</b>
SmartAC	1.3	1.2	1.2	2.9
BIP	1.6	1.3	1.3	1.3
CBP	0.9	0.8	0.8	1.3
Portfolio	1.2	1.0	1.1	1.4

### 8) An updated program cost-effectiveness analysis.

The following table illustrates the updated CE based on the proposed funding shift. Overall, the portfolio CE impact is de minimis.

<b>Cost-Effectiveness (Post-Shift of Funds)</b>				
<b>Program or Portfolio</b>	<b>TRC (Total Ratepayer Cost)</b>	<b>RIM (Ratepayer Impact Measure)</b>	<b>PAC (Program Administrator Cost)</b>	<b>PCT (Participant Cost Test)</b>
SmartAC	1.5	1.4	1.4	2.9
BIP	1.6	1.2	1.2	1.3
CBP	0.8	0.7	0.7	1.3
Portfolio	1.3	1.1	1.1	1.4

In some cases the CE changed under one CE measurement methodology but not another. For instance, the TRC for SmartAC increased from 1.3 to 1.5 but did not change under the PCT (2.9). The observed increase in CE for SmartAC was expected based on the proposed removal of \$5.8M of cost.

The CE impact on the other programs (BIP and CBP) varies with either no change or a slight decrease based on the specific CE methodology used. The reasons for the impact on BIP and CBP stems from the fact that certain non-program specific costs (e.g., ADR, EM&V, ME&O and System Support)<sup>17</sup> are allocated based on a percentage. Specifically, system support costs that include IT are most heavily assigned to BIP (58%) and CBP (24%). Therefore, the expectation is these additional costs would push the CE values downward. A summary of these changes are enumerated below.

- **BIP:** While the TRC and PCT values did not change, they did go down slightly under the RIM and PAC tests.
- **CBP:** While the TRC, RIM, and PAC values went down slightly, it did not change for PAC.
- **Portfolio:** While the TRC and RIM values went up slightly, the PAC and PCT values did not change.

<sup>17</sup> ADR (AutoDR), EMV (Evaluation Measurement & Valuation), ME&O (Marketing, Education & Outreach).

**Protests**

**\*\*\*Due to the COVID-19 pandemic, 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](mailto:EDTariffUnit@cpuc.ca.gov) and [PGETariffs@pge.com](mailto: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](mailto: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](mailto:PGETariffs@pge.com)

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

**Effective Date**

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

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A. 17-12-003. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

\_\_\_\_\_  
/S/

Sidney Dietz  
Director, Regulatory Relations

**Attachments**

cc: Service List A.17-12-003



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6180-E

Tier Designation: 3

Subject of AL: Pacific Gas & Electric Company's Request for Funding Shifting Associated with its 2018-2022 Demand Response Funding Cycle

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

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

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

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

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

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

Resolution required?  Yes  No

Requested effective date:

No. of tariff sheets: N/A

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

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

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

Tariff schedules affected: N/A

Service affected and changes 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:

**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