

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



March 21, 2022

**AL PG&E 4458-G/6237-E**

Sidney Bob Dietz II, c/o Megan Lawson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B13U  
San Francisco, CA 94177

**SUBJECT: Transfer of Residential Uncollectibles from COVID-19 Pandemic  
Protections Memorandum Accounts (CPPMA) into Residential  
Uncollectible Balancing Account (RUBA)**

Dear Mr. Dietz II:

Pacific Gas and Electric Company (PG&E) Advice Letter 4458-G/6237-E regarding transfer of residential uncollectibles from COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) into Residential Uncollectible Balancing Account (RUBA) is approved effective July 23, 2021.

The appendix of this letter provides a summary of the protest to AL 4458-G/6237-E, PG&E's response to the protest, and Energy Division's disposition of the issues.

Please contact Paul Phillips at [Paul.Phillips@cpuc.ca.gov](mailto:Paul.Phillips@cpuc.ca.gov) or (415) 703-1786 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "SBaker".

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

cc: EDTariffUnit  
David Cheng, Attorney for TURN  
Service List R.18-07-005

## **Appendix: Energy Division Technical Review and Analysis**

### **Background**

On April 17, 2020, the CPUC approved Resolution M-4842, establishing numerous customer protections in response to the emergency situation created by the COVID-19 Pandemic. Resolution M-4842 authorized IOUs to establish COVID Pandemic Protections Memorandum Accounts (CPPMAs) to track and recover costs of implementing these emergency protections.

On June 20, 2020, the CPUC approved Decision (D.) 20-06-003, including Ordering Paragraph (OP) 89, which authorized Investor-Owned Utilities (IOUs) to establish Residential Uncollectible Balancing Accounts (RUBAs) to track and recover the costs of uncollected gas and electric residential bills. In addition, OP 92 of D.20-06-003 authorized IOUs to submit Tier 2 Advice Letters to transfer the uncollectibles recorded in the IOU CPPMAs to the newly-established RUBAs. On June 23, 2021, PG&E submitted AL 4334-G/6001-E establishing PG&E's RUBA, which was approved and effective on July 23, 2021.

On December 30, 2020, Southern California Edison (SCE) submitted AL 4385-E to transfer approximately \$96,854,000 from SCE's CPPMA to SCE's RUBA. On May 26, 2021, San Diego Gas and Electric Company (SDG&E) submitted AL 3772-E/2982-G to transfer \$1,035,651 from SDG&E's CPPMA to SDG&E's RUBA. These ALs were both approved on June 23, 2021. PG&E's AL 4458-G/6237-E seeks to transfer \$11,431,435 in residential uncollectibles recorded in PG&E's CPPMA to the RUBA.

### **TURN Protest and PG&E Reply**

On July 13, 2021, The Utility Reform Network (TURN) filed a timely protest of AL 4458-G/6237-E, arguing that PG&E had not provided sufficient detail about the process used to determine the dollar amount of eligible residential uncollectibles to be transferred from PG&E's CPPMA to the RUBA. TURN argued that PG&E must provide more detail on its calculations before the AL operationalizing the transfer could be approved.

On July 20, 2021, PG&E replied to TURN's protest, stating that D.20-06-003 does not require IOUs to provide more detail on the proposed amount to be transferred than PG&E provided in AL 4458-G/6237-E. PG&E noted that similar ALs filed by other IOUs included similar levels of detail on the proposed amounts to be transferred and have already been approved by the CPUC. Moreover, PG&E noted that the uncollectibles transferred to PG&E's RUBA would be subject to further scrutiny during PG&E's subsequent General Rate Case (GRC), in which it will formally propose to recover these costs.

### **Disposition**

Energy Division finds that D.20-06-003 does not specifically require the IOUs to provide any additional documentation or detail, as requested by TURN, to substantiate

the PG&E's costs beyond what was already included in AL 4458-G/6237-E. PG&E correctly observes in its reply to TURN's protest that the additional level of detail requested by TURN was not required of the other IOUs prior to the approval of their equivalent ALs. Furthermore, PG&E will not be authorized to recover these costs until they have been reviewed and approved as part of PG&E's next GRC, where a more thorough reasonableness review may be conducted. Accordingly, PG&E's AL 4458-G/6237-E is approved with an effective date of June 23, 2021.



**Sidney Bob Dietz II**  
Director  
Regulatory Relations

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

Fax: 415-973-1448

June 23, 2021

**Advice 4458-G/6237-E**

(Pacific Gas and Electric Company U 39 M)

Public Utilities Commission of the State of California

**Subject:     Transfer of Residential Uncollectibles from COVID-19 Pandemic  
                  Protections Memorandum Accounts (CPPMA) into Residential  
                  Uncollectible Balancing Accounts (RUBA)**

**Purpose**

The purpose of this filing is to seek approval from the California Public Utilities Commission (the Commission or CPUC) to transfer the portions of its incremental residential uncollectible expense in the electric and gas COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) into the electric and gas Residential Uncollectible Balancing Accounts (RUBA). The balance transfers are in accordance with Ordering Paragraph (OP) 92 of Commission Decision (D.) 20-06-003, dated June 11, 2020.

**Background**

On April 16, 2020, the Commission adopted Resolution M-4842, directing utilities to offer the protections adopted in D.19-07-015 to all residential and small business customers through April 16, 2021.

On May 1, 2020, PG&E submitted Advice 4244-G/5816-E in accordance with OP 4 of Resolution M-4842, to establish new gas and electric COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) to record costs associated with offering the required protections in the Resolution.

On June 11, 2020, the CPUC adopted D.20-06-003, which authorized PG&E to establish new two-way balancing accounts to record uncollectibles recovered from residential electric and gas customers compared to actual uncollectibles. On November 16, 2020, PG&E submitted Advice 4334-G/6001-E to establish its RUBA. PG&E then submitted supplemental Advice 4334-G-A/6001-E-A on January 13, 2021. These were approved on April 13, 2021.

On February 11, 2021, the Commission adopted Resolution M-4849 extending COVID-19 emergency customer protections for all residential and small business customers from April 16, 2021 through June 30, 2021. In Resolution M-4849, the Commission further directed the electric and gas corporations subject to this Resolution to continue to use the CPPMA established in Resolution M-4842 to record costs associated with extending the required customer protections in Resolution M-4849.

### **Request to Transfer CPPMA Residential Uncollectibles to RUBA**

PG&E submits this Tier 2 Advice Letter in compliance with Ordering Paragraph 92 which states:

Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company may submit Tier 2 Advice Letters to address the issue of transferring the portion of their COVID-19 Pandemic Protections Memorandum Account related to uncollectibles from residential disconnections into the two-way balancing account.

PG&E requests approval to transfer the incremental electric and gas residential customer uncollectible expense of \$8.5M and \$2.9M, respectively, from the CPPMA to the RUBA. These amounts represent the incremental uncollectible expense recorded in the CPPMA for the period of March 4, 2020<sup>1</sup> through June 10, 2020<sup>2</sup> as of May 31, 2021. The Uncollectible Expense (line two in the table below) is recorded initially as an estimate and then trued-up to actual write-offs. As such, PG&E also requests that the amounts transferred take into account any adjustments to Uncollectible Expense that occurs between May 31, 2021 and the approval of this filing.

These amounts also represent the interest expense/(revenue) accrued on the recorded incremental uncollectible expense as of May 31, 2021. Interest is recorded on a monthly basis. As such, PG&E also requests to transfer any related interest for the period of June 2021 to the approval of this advice filing.

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<sup>1</sup> Advice Letter 4244-G-B/5816-E-B was approved with an effective date of March 4, 2020.

<sup>2</sup> Advice Letter 4334-G/6001-E and its supplemental, 4334-G-A/6001-E-A, were approved with an effective date for the RUBA of June 11, 2020. The incremental residential uncollectible expense recorded in the CPPMA for the period of June 11, 2020 (effective date of the RUBA) through April 30, 2021 was transferred to the RUBA. In addition, all subsequent incremental residential uncollectible expense will be recorded directly in the RUBA.

	<u>Electric</u>	<u>Gas</u>	<u>Total</u>
Revenues	\$(3,286,325)	\$(2,392,294)	\$(5,678,619)
Uncollectible Expense	11,819,300	5,287,435	17,106,735
Incremental Uncollectible Expense	8,532,975	2,895,141	11,428,116
Interest	3,952	(633)	3,319
Total Transfer to RUBA	<b><u>\$8,536,927</u></b>	<b><u>\$2,894,508</u></b>	<b><u>\$11,431,435</u></b>

Upon approval, PG&E will transfer the amounts described above from the CPPMA to the RUBA. The balances in the RUBA, including the transferred amounts, will be recovered in rates through the next Annual Electric and Gas True-up advice letter process.

### Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **July 13, 2021**, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 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 Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-1448  
E-mail: PGETariffs@pge.com





# 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 (U 39 M)

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4458-G/6237-E

Tier Designation: 2

Subject of AL: Transfer of Residential Uncollectibles from COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) into Residential Uncollectible Balancing Accounts (RUBA)

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 #: D.20-06-003

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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

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

Resolution required?  Yes  No

Requested effective date: 7/23/21

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 Bob Dietz II, 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