

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 6275E**  
**As of August 27, 2021**

Subject: Establish the Voluntary Allocation and Market Offer Memorandum Account Pursuant to Decision 21-05-030

Division Assigned: Energy

Date Filed: 07-29-2021

Date to Calendar: 08-04-2021

Authorizing Documents: D2105030

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>07-29-2021</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

[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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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)**

July 29, 2021

**Advice 6275-E**

Pacific Gas and Electric Company (U 39 E)

Public Utilities Commission of the State of California

**Subject:      Establish the Voluntary Allocation and Market Offer Memorandum  
Account Pursuant to Decision 21-05-030**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby submits this advice letter to the California Public Utilities Commission (Commission), pursuant to Ordering Paragraph (OP) 8 of Decision (D.) 21-05-030 (the VAMO Decision), to establish the Voluntary Allocation and Market Offer (VAMO) Memorandum Account (VAMOMA-E), Electric Preliminary Statement Part JC. The purpose of this memorandum account is to track and record the incremental costs associated with administering the renewables portfolio standard (RPS) VAMO process.

**Background**

In Phase 1 of the Commission's Power Charge Indifference Adjustment (PCIA) Rulemaking (R.) 17-06-026, the Commission examined the PCIA methodology and considered alternatives to that methodology to ensure that bundled service customer indifference was maintained. Among other things D.18-10-019 adopted an annual true-up to the recorded costs of the portfolio, a modification to administratively set market price benchmarks for calculating the investor owned utilities' (IOU) above-market costs of the portfolio, and associated modifications to ratemaking in the IOUs' tariffs; and opened a second phase of the proceeding with a working group process resulting in four decisions to address three specific topic areas: (1) the market price benchmarks, (2) a voluntary prepayment option, and (3) portfolio optimization and cost reduction. The VAMO Decision adopts a VAMO process for each IOU's RPS-eligible resource that is eligible for PCIA cost recovery and authorizes a process for the IOUs to allocate a "slice" of an IOU's entire PCIA-eligible RPS portfolio to eligible load serving entities in proportion to their vintaged, forecasted annual load share.<sup>1</sup>

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<sup>1</sup> D.21-05-030, OP 2.

The VAMO Decision appropriately concluded that the IOUs may require new staffing and development of new systems to track, conduct, and settle the VAMO process and shall seek recovery of these associated costs in their Energy Resource Recovery Account (ERRA) forecast applications. OP 8 of the VAMO Decision states that the investor-owned utilities "...shall each file a Tier 1 advice letter to establish a memorandum account to track the incremental staffing and systems costs of administering the RPS Voluntary Allocation and Market Offer and the utilities may seek recovery of these costs in their individual ERRA forecast applications."<sup>2</sup>

### **Tariff Revisions**

This Tier 1 advice letter establishes Electric Preliminary Statement Part JC -- Voluntary Allocation and Market Offer Memorandum Account (VAMOMA-E) to track and record the incremental costs associated with administering the renewables portfolio standard (RPS) VAMO process, including the incremental costs for staffing, development of technology systems to track, conduct, and settle the VAMO process, reporting, forecasting and other reasonable expenditures incurred by PG&E to implement the VAMO process. PG&E's proposed new tariff Electric Preliminary Statement Part JC – Voluntary Allocation and Market Offer Memorandum Account is provided as Attachment 1 to this advice letter.

### **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 **August 18, 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)

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<sup>2</sup> D.21-05-030, OP 8; See also, Conclusion of Law (COL) 17 ("It is reasonable to direct each IOU to file a Tier 1 advice letter to establish a memorandum account to track the incremental staffing and systems costs of administering the RPS VAMO so they may seek recovery of these costs through ERRA forecast applications.") See also, D.21-05-030, p. 37 (Table 2: Timeline for First RPS VAMO and [Request for Information (RFI)]).

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 B13U  
P.O. Box 770000  
San Francisco, California 94177

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

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

### **Effective Date**

PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is **July 29, 2021**.

### **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 lists for Rulemaking (R.) 17-06-026 and R.18-07-003, and Application 21-06-001. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.





# 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 E)

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) #: 6275-E

Tier Designation: 1

Subject of AL: Establish the Voluntary Allocation and Market Offer Memorandum Account Pursuant to Decision 21-05-030.

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.21-05-030

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: 7/28/21

No. of tariff sheets: 3

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: See Attachment 1

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:

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
50801-E	ELECTRIC PRELIMINARY STATEMENT PART JC VOLUNTARY ALLOCATION AND MARKET OFFER MEMORANDUM ACCOUNT (VAMOMA-E) Sheet 1	
50802-E	ELECTRIC TABLE OF CONTENTS Sheet 1	50656-E
50803-E	ELECTRIC TABLE OF CONTENTS Sheet 17	50038-E



**ELECTRIC PRELIMINARY STATEMENT PART JC** Sheet 1 (N)  
VOLUNTARY ALLOCATION AND MARKET OFFER MEMORANDUM ACCOUNT (VAMOMA-E) (N)

JC. VOLUNTARY ALLOCATION AND MARKET OFFER MEMORANDUM ACCOUNT (VAMOMA-E) (N)

1. PURPOSE: The purpose of the VAMOMA is to track and record incremental costs incurred for staffing and information technology systems needed for administering the VAMO. Such costs may include amounts related to, but not limited to, information technology work, systems, staffing, reporting, forecasting and other reasonable expenditures to implement the VAMO. (N)
2. APPLICABILITY: The VAMOMA will apply to all customer classes, except for those specifically excluded by the Commission.
3. REVISION DATES: Disposition of the balance in the account will be through an ERRA forecast application or other application as authorized by the Commission through the Portfolio Allocation Balancing Account.
4. RATES: The VAMOMA does not have a separate rate component.
5. ACCOUNTING PROCEDURE: The following entries will be made each month, or as applicable:
  - a) A debit entry equal to incremental expenses;
  - b) A debit or credit entry equal to the capital revenue requirement associated with the actual capital expenditures incurred. Capital-related revenue requirements include depreciation expense, return on rate base at the authorized cost of capital, federal and state income taxes, and property taxes, associated with the capital asset additions;
  - c) An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
  - d) An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor. (N)

(Continued)





**ELECTRIC TABLE OF CONTENTS**

Sheet 17

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
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Part GF	Customer Data Access Balancing Account – Electric.....	33136-E
Part GH	Mobile Home Park Balancing Account - Electric.....	47077,47078-E
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Part GR	Green Tariff Shared Renewables Balancing Account (GTSRBA).....	40569,40570,35377-E
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Part GV	Distribution Interconnection Memorandum Account (DIMA) .....	40575-E
Part GY	Electric Vehicle Program Balancing Account (EVPBA).....	40576-E
Part GZ	Distributed Energy Resources Distribution Deferral Account .....	43656,43657,43658-E
Part HA	Avoided Cost Calculator Memorandum Account.....	40000-E
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Part HC	Rule 20A Balancing Account.....	41736-E
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Part HR	Net Energy Metering (NEM) Balancing Account (NEMBA).....	43317-E
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Part HX	Wildfire Plan Memorandum Account (WPMA) .....	44450-E
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Part IQ	Electric Reliability Memorandum Account (ERMA) .....	49679-E
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(Continued)

**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