

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



February 17, 2022

Advice Letter 6277-E and 6227-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 (Q2, 2021).

Dear Mr. Jacobson:

Advice Letter 6277-E and 6227-EA is effective as of December 23, 2021.

Sincerely,

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

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



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: 415-973-3582

December 17, 2021

Advice 6277-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q2, 2021)

Purpose

Pacific Gas and Electric Company ("PG&E") is submitting this supplemental advice letter to the California Public Utilities Commission ("Commission" or "CPUC") related to its Procurement Transaction Quarterly Compliance Report ("QCR") for record period April 1, 2021 to June 30, 2021, (Q2-2021) to correct the Strategy Update for Resource Adequacy Sale and Purchase document located in the following Confidential Attachment E folders: Q2 2021 Bilateral, Q2 2021 Broker, Q2 2021 E-Solicitation, and Q2 2021 Market RFP of Advice Letter 6277-E.

This supplemental advice letter replaces the Strategy Update for Resource Adequacy Sale and Purchase document referenced above.

Background

Advice Letter 6277-E

PG&E submitted its QCR for Q2-2021 on July 30, 2021 in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports to be submitted within 30 days of the end of the quarter.

Advice Letter 6277-E-A

In response to the Utility Audit Branch staff Q2 2021 QCR Audit Report, PG&E is submitting this Supplemental Advice Letter to correct the Strategy Update for Resource Adequacy Sale and Purchase document in Confidential Attachment E.

Attachment 1: Confidential Attachment E - CLEAN
Revised Strategy Update for Resource Adequacy Sale and Purchase

Attachment 2: Confidential Attachment E - REDLINE
Revised Strategy Update for Resource Adequacy Sale and Purchase

Protests

PG&E asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 6277-E and not reopen the protest period.

Effective Date

Pursuant to General Order 96-B, Energy Industry Rule 5.1, this Tier 2 advice letter will become effective concurrent with original Advice Letter 6277-E, which is August 29, 2021. Advice Letter 6277-E was suspended for a period of up to 120 days, therefore there is no need to extend the effective date. The effective date of Advice Letter 6277-E-A remains suspended until disposition by Energy Division.

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 service list for Rulemaking ("R.") 16-02-007. 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.Officer@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 Bob Dietz II
Director, Regulatory Relations

Attachments

Attachment 1: Revised Confidential Attachment E - CLEAN
Revised Strategy Update for Resource Adequacy Sale and Purchase

Attachment 2: Revised Confidential Attachment E - REDLINE
Revised Strategy Update for Resource Adequacy Sale and Purchase

Attachment 3: Confidentiality Declaration and Matrix

cc: Service List R.16-02-007 (Public Version)
PG&E's Procurement Review Group (Confidential Version)



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) #: 6277-E-A

Tier Designation: 2

Subject of AL: Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q2, 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: Marianne Aikawa, (415)973-0375

Resolution required? Yes No

Requested effective date: 8/29/21

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 proposed¹: N/A

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

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: 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

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

Advice 6277-E-A
December 17, 2021

Attachment 1

Revised Confidential Attachment E - CLEAN
Revised Strategy Update for Resource Adequacy Sale and
Purchase

Attachment 2

**Revised Confidential Attachment E - REDLINE
Revised Strategy Update for Resource Adequacy Sale and
Purchase**

Advice 6277-E-A
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Attachment 3

Confidentiality Declaration and Matrix

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING
SUPPLEMENTAL ADVICE LETTER 6277-E-A**

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S
SUPPLEMENTAL ADVICE LETTER 6277-E-A,
Q2 2021 QCR CONFIDENTIAL ATTACHMENTS 1 AND 2:
REVISED STRATEGY UPDATE FOR RESOURCE ADEQUACY SALE AND
PURCHASE (ATTACHMENT E)**

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 December 17, 2021 Supplemental Advice Letter 6277-E-A, Q2 2021 QCR for Confidential Attachments 1 and 2 Revised Strategy Update for Resource Adequacy Sale and Purchase (Attachment E) .
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 December 17, 2021, at San Francisco, California.

/s/
Marianne Aikawa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6277-E-A
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2021
 DECEMBER 17, 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
Document: Quarterly Compliance Report Supplemental Advice Letter 6277-E-A			
<ul style="list-style-type: none"> • Atch 1 Revised Conf Q2 2021 Strategy paper-CLEAN.doc • Atch 2 Revised Conf Q2 2021 Strategy paper-REDLINE.doc 	<p>Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)</p> <p>Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;</p> <p>Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids</p>	<p>Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.</p> <p>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.</p>	<p>3 years, except for the delivered product price of RA and RPS sales transactions, which are only confidential for two quarters following the month of delivery. Other non-public terms are confidential for three years from date contract states deliveries to begin; or until one year following expiration, whichever comes first.</p>

**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
International Power Technology

Intertie

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

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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