

**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](mailto: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](mailto:Process.Officer@cpuc.ca.gov). Send all electronic approvals to [PGETariffs@pge.com](mailto:PGETariffs@pge.com). Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

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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 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 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
<b>Document: Quarterly Compliance Report Supplemental Advice Letter 6277-E-A</b>			
<ul style="list-style-type: none"> <li>• Atch 1 Revised Conf Q2 2021 Strategy paper-CLEAN.doc</li> <li>• Atch 2 Revised Conf Q2 2021 Strategy paper-REDLINE.doc</li> </ul>	<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&amp;E's net open position.</p> <p>Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&amp;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&amp;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