

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6304E
As of September 29, 2021

Subject: Notification Regarding Assembly Bill 970 Quarterly Reporting in Compliance with Decision 20-11-027, Ordering Paragraph 3

Division Assigned: Energy

Date Filed: 08-23-2021

Date to Calendar: 08-25-2021

Authorizing Documents: D2011027

Disposition:	Accepted
Effective Date:	08-23-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



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

August 23, 2021

Advice 6304-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Notification Regarding Assembly Bill 970 Quarterly Reporting in Compliance with Decision 20-11-027, Ordering Paragraph 3

Purpose

Pacific Gas and Electric Company (PG&E) respectfully submits this Tier 1 advice letter in compliance with Ordering Paragraph (OP) 3 in Decision (D.) 20-11-027 regarding Assembly Bill (AB) 970 quarterly reporting requirements.

In D.20-11-027, the California Public Utilities Commission (CPUC or Commission) exempted PG&E from the AB 970 reporting requirements adopted in 2006 because of more recent reporting requirements resulting from a settlement at the Federal Energy Regulatory Commission (FERC).¹ However, the Commission also required PG&E to submit a Tier 1 advice letter providing notice to the Commission if the FERC-approved settlement requirements “expire or are reduced in scope as compared to the Assembly Bill 970 quarterly reporting requirements under D.06-09-003”²

As a result of conversations with and feedback from Commission Staff and parties that received the AB 970 Report, PG&E and the parties have concluded that the AB 970 Report provided some information that is not in the STAR Process Project Data Spreadsheet (PDS). In order to address Commission Staff’s and parties’ feedback, PG&E will be re-initiating the AB 970 Report starting on October 1, 2021, as described below.

¹ D.20-11-027, OP 1. The FERC-approved settlement created a process called the Stakeholder Transmission Asset Review (STAR) Process under which PG&E provides extensive transmission-related information to stakeholders on a bi-annual basis. See D.20-11-027, p. 4.

² D.20-11-027, OP 3.

Background

AB 970 was enacted by the California Legislature in 2000 and “required the Commission to undertake certain actions to reduce or remove constraints on the electrical transmission and distribution system to facilitate the development of generating resources.”³ In 2006, the Commission established a quarterly reporting process for transmission projects for all three investor-owned utilities in D.06-09-003.⁴ On April 1, 2020, PG&E filed a petition to modify D.06-09-003 to eliminate the AB 970 reporting process for PG&E. In its Petition to Modify, PG&E explained:

During the development of the STAR Process, PG&E and the stakeholder representatives agreed that the information required in the AB 970 Quarterly Reports is duplicative of, and far less extensive than, the information that will be provided in the STAR Process. Thus, PG&E proposed eliminating the quarterly report requirement in D.06-09-003 through a petition for modification. Commission staff involved in the development of the STAR Process supported this approach.⁵

The Commission granted PG&E’s Petition to Modify on November 30, 2020 in D.20-11-027. However, the Commission also noted that if the STAR Process reporting requirements “expire or are reduced in scope compared to the Assembly Bill 970 quarterly reporting requirements under Decision 06-09-003, PG&E shall notify the Commission by Tier 1 Advice Letter.”⁶

To date, PG&E has provided three STAR Process bi-annual submissions, on June 1, 2020, December 1, 2020, and June 1, 2021. The December 1, 2020 and June 1, 2021 submissions were provided to the I.00-11-001 service list, as required by OP 2 in D.20-11-027.

PG&E understands that in 2021, parties that had previously received the AB 970 Report indicated to Commission Staff that they had concerns about whether the STAR Process PDS included all of the information provided in the AB 970 Report. PG&E further understands that there were several conversations between parties and Commission Staff regarding this issue.

Commission Staff raised these concerns with PG&E. Commission Staff and PG&E employees engaged in a number of conversations regarding the information provided in

³ D.20-11-027, p. 1.

⁴ D.20-11-027, p. 1.

⁵ *Pacific Gas and Electric Company Petition to Modify Decision 06-09-003 to Eliminate Reporting Requirements*, submitted in Investigation (I.) 00-11-001 on April 1, 2020 (Petition to Modify), p. 3.

⁶ D.20-11-027, OP 3.

the STAR Process PDS and how that information correlated to information that was previously provided in the AB 970 Report.

To address some of the AB 970 Report issues, Commission Staff sent PG&E discovery requests on June 25, 2021 regarding specific types of information included in the AB 970 Report. PG&E provided a response on July 27, 2021, which Commission Staff then provided to the I.00-11-001 service list on the same day.

On August 3, 2021, PG&E hosted an all-day STAR Process stakeholder meeting. The service list in I.00-11-001 was invited to the stakeholder meeting. One of the topics addressed at the meeting was the AB 970 Report information. PG&E explained the kind of information that had been included in the AB 970 Report and where this information could be found in the STAR Process PDS. During the workshop, parties that had previously received the AB 970 Report were able to ask questions and provide feedback regarding the STAR Process PDS. These parties pointed out some differences between the AB 970 Report information and the STAR Process PDS. The parties also indicated that they only needed specific and more limited information than is provided in the STAR Process PDS, and that the information they needed was more readily accessible in the AB 970 Report.

After the August 3rd workshop, PG&E was able to talk further with Commission Staff regarding the feedback received during the workshop and next steps for AB 970 reporting.

PG&E's Plan to Re-initiate AB 970 Reporting

As indicated in the Petition for Modification, PG&E and stakeholders involved in developing the STAR Process, including Commission Staff, had originally understood that the AB 970 Report would be duplicative of information in the STAR Process PDS and thus the AB 970 Report was no longer needed. This was confirmed in D.20-11-027 where the Commission noted that “[i]t is uncontested that PG&E’s reporting requirements under the partial settlement at FERC are much more comprehensive than its reporting requirements under D.06-09-003.”⁷

However, based on the feedback and comments from parties that previously received the AB 970 Report regarding differences between the AB 970 Report and the STAR Process PDS, PG&E now understands that the information is not entirely identical. Given this, PG&E believes it is appropriate to re-initiate the AB 970 Report. Information regarding AB 970 projects was provided to parties on July 27, 2021. To re-establish the quarterly reporting schedule, PG&E is proposing to provide its first AB 970 Report following re-initiation on October 1, 2021. The next report would be provided on January 1, 2022, and then on a quarterly basis thereafter. PG&E reviewed this proposal with Commission Staff who supported this approach.

⁷ D.20-11-027, p. 4.

Although the circumstances here are not entirely identical to the circumstances described in OP 3, PG&E believes that the intent of OP 3 was to provide the Commission notice if there was any need to re-initiate the AB 970 Report process. Thus, PG&E is submitting this Tier 1 Advice Letter to provide notice to the Commission and parties in I.00-11-001 that it will be re-initiating the AB 970 Report on October 1, 2021.

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 and 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 September 13, 2021, which is 21 days⁸ after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th 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 B13U
P.O. Box 770000
San Francisco, California 94177

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

⁸ The 20-day protest period concludes on a weekend; therefore, PG&E is moving this date to the following business day.

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

Pursuant to General Order (GO) 96-B, Rule 5.1, and OP 3 of D.20-11-027, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is August 23, 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 list for I.00-11-001. 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/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

cc: I.00-11-001 Service List



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) #: 6304-E

Tier Designation: 1

Subject of AL: Notification Regarding Assembly Bill 970 Quarterly Reporting in Compliance with Decision 20-11-027, Ordering Paragraph 3

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.20-11-027

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: 8/23/21

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 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 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

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

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