

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



October 26, 2021

Advice Letter 4587-E-A/E-B/E-C

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**SUBJECT: Southern California Edison Company, Pacific Gas and Electric Company,
San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric),
Bear Valley Electric Service, Inc., and PacifiCorp's Updates to GHG
Templates**

Dear Messrs. Menon, Kaushik, Kishore, Nguyen, Dietz, Anderson, and Marsh,

This disposition letter approves SCE Advice Letter 4587-E-A/E-B/E-C, PG&E Advice Letter 6326-E-A/ E-B/E-C, SDG&E Advice Letter 3845-E-A/ E-B/E-C, Liberty Utilities Advice Letter 177-E-A/ E-B/E-C, Bear Valley Electric Service Company Advice Letter 425-E-A/ E-B/E-C, and PacifiCorp Advice Letter 660-E-A/ E-B/E-C with an effective date of October 26, 2021.

Background:

On August 19, 2020 the Commission approved Decision (D.)21-08-026, “Decision Adopting Customer Climate Credit Updates” (Decision). This Decision adopted revisions to CPUC methodologies and processes to ensure compliance with current statute and California Air Resources Board (CARB) regulation as well as streamline existing processes. To achieve these goals, ordering paragraph 12 of the Decision required Energy Division to hold, and the Investor Owned Utilities (IOUs) named as parties in R.20-05-002 to attend, a workshop on modifications to Templates in Appendix D of D.14-10-033 (as modified in D.14-10-055 and D.15-01-024). These templates are used to annually account for the Cap-and-Trade allocated allowance auction proceeds (referred to informally as the “GHG proceeds” or “Cap-and-Trade money”) received by each IOU. The allocated allowance proceeds fund several clean energy and energy efficiency projects as well as credits to industrial, small business, and residential customers through CA Industry Assistance and the California Climate Credit. In addition to forecasting annual gross proceeds, the templates forecast administrative and outreach expenses and the divide the proceeds available among recipient groups according to pre-existing Commission-approved formulas.

Pursuant to the Commission’s directive in Ordering Paragraph 12 of D.21-08-026, on August 30th, 2021 the Energy Division facilitated a workshop on updates needed to the templates to comply with changes in crediting methodologies approved in D.21-08-026. In addition, the workshop discussed clean-up options for templates. The templates were first approved in 2014 and the use of allocated allowance auction proceeds has evolved over time. Workshop participants discussed which templates could be removed or modified to support updated Commission directives to align with updated methodologies, reduce administrative burden, and provide a clearer picture of allocated allowance auction proceeds use.

In compliance with Ordering Paragraph 13, on September 14, 2021 Southern California Edison submitted advice letter 4587-E et al. on behalf of the Joint IOUs.^{1,2} The advice letter recommended changes to Template D-1 and removal of Templates D-2, D-4, and D-5. The advice letter also requested a reduction in the comment period from 20 to seven days. On September 17, 2021 Energy Division emailed the service lists of R.20-05-002, A.13-08-002, and SCE’s GO 96-B rejecting the request to shorten the comment period.

Template D-2, “Annual GHG Emissions and Associated Costs,” totals the annual direct and indirect GHG costs a utility incurs for compliance with the Cap-and-Trade Program. In their advice letter, the Joint IOUs state that the purpose of collecting this cost information is to calculate the Cap-and-Trade cost burden for various user groups so that small business California Climate Credit customers could be credited for a portion of their total Cap-and-Trade costs in rates. However, as D.21-08-026 removed the volumetric return methodology, the Joint IOUs state that this cost information is no longer needed to calculate the small business California Climate Credit.

¹Southern California Edison (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc. (BVES), and PacifiCorp d/b/a Pacific Power (PacifiCorp), collectively the Joint IOUs.

²SCE 4587-E is also available from each of the Joint IOUs: PG&E Advice Letter 6326-E, SDG&E Advice Letter 3845-E, Liberty Utilities Advice Letter 177-E, Bear Valley Electric Service Company Advice Letter 425-E, and PacifiCorp Advice Letter 660-E.

The Joint IOUs also acknowledged that D.19-04-016 orders that certain lines for recorded direct GHG costs in Template D-2 be submitted in the IOUs' respective ERRR Compliance or ECAC application.^{3,4} The Joint IOUs state that the information requested by D.19-04-016 from Template D-2 in the Forecast ERRR proceeding is already found in the ERRR Compliance Filing.

On October 1, 2021 on behalf of the Joint IOUs, SCE submitted supplemental SCE Advice Letter 4587-E-A et al.⁵ replacing the original advice letter in its entirety. The supplement made two non-substantive additional edits to Template D-1. First, the supplement edited line 14 in compliance with D.20-04-012 ordering paragraph 6 to direct template users to list allocations for each clean energy or energy efficiency (CEEE) program separately on individual lines. Second, as discussed in the August 30th workshop, the template requested further detail on the number of residential households receiving the California Credit Climate by including individual lines for the number of bundled and unbundled residential customers (Lines 21 and 22 in Template D-1 of the supplement). The supplement also included the notes (sometimes referred to as the "directions") page for Template D-1 in both redline and clean form. The updates to the notes page match the changes previously discussed in the body of the advice letter.

Protest and Utility Response:

One protest was timely filed on October 4, 2021 by the Public Advocates Office.

In their protest, the Public Advocates Office does not agree with the Joint IOUs' proposal to remove Template D-2 in its entirety. The Public Advocates Office states that in D.14-03-033, the Decision originating the templates, the Commission stated that Template D-2 would allow for an additional level of cost tracking of GHG-compliance related expenditures.⁶ To that end, the Public Advocates Office disagrees with the Joint IOUs' characterization of Template D-2 as solely needed for volumetric crediting purposes. The Public Advocates Office also states that Template D-2 plays a potentially important role for the public as lines 13-14 are "...one of the few places in any GHG [greenhouse gas] filing where general utility GHG emissions and cost information are not redacted..."⁷

To counter the Joint IOUs' contention that the information presented in the Forecast ERRR Template D-2 application is already presented elsewhere in the Compliance ERRR application and is therefore extraneous, the Public Advocates Office states that the duplication of the same information in the Forecast ERRR Template D-2 allows reviewers to check for consistency and accuracy across applications. Furthermore, the Public Advocates Office notes that the format of Template D-2 allows for at-a-glance year-over-year comparison of greenhouse gas compliance costs, a capability that is not readily available elsewhere in the Compliance ERRR application.

³D.19-04-016 Ordering Paragraph 1, Attachment A, Section 10. Regulatory Review of WAC Methodology.

⁴ Energy Resource Recovery Account (ERRR) and Energy Cost Adjustment Clause (ECAC).

⁵Identical to: PG&E Advice Letter 6326-E-A, SDG&E Advice Letter 3845-E-A, Liberty Utilities Advice Letter 177-E-A, Bear Valley Electric Service Company Advice Letter 425-E-A, and PacifiCorp Advice Letter 660-E-A.

⁶ D.14-10-033 at 35.

⁷ Public Advocates Protest to Advice Letter 4587-E, page 2.

Finally, the Public Advocates Office reaffirms the Joint IOUs' assertion that D.19-04-016 specifically requires portions of each IOU's Forecast ERRR Template D-2 to be filed as part of that IOU's Compliance ERRR application. The Public Advocates Office proposes allowing a portion of Template D-2 to be deleted, specifically lines 9-12 and 18, which were not required by D.19-04-016 Ordering Paragraph 1.

Regarding all other templates, the Public Advocates Office did not have any protests regarding changes proposed to Template D-1, the continued use of Template D-3 without changes, or the removal of Templates D-4 and D-5.

A reply to the protest was timely filed on October 11, 2021 by SCE on behalf of the Joint IOUs. In the reply, the Joint IOUs agree with Cal Advocates' protest assertion that "...GHG emissions and cost data supplied in this [D-2] template is not readily available elsewhere in the same format and in one table..."⁸ Furthermore, the Joint IOUs agree with Cal Advocates that certain lines are no longer necessary. The Joint IOUs proposed to submit a supplemental advice letter restoring a modified version of Template D-2, removing only those lines Cal Advocates' protest indicated were no longer needed.

On October 14, 2021 SCE submitted supplemental Advice Letter 4587-E-B et al.⁹ This supplemental advice letter restored a modified version of Template D-2 to the D-series templates. Compared to the original template from D.14-10-033 (and as modified in D.14-10-055 and D.15-01-024), the modified version in Advice Letter 4587-E-B removed lines 9-12 and 18 in response to Cal Advocates' protest that these lines, which deal with indirect GHG emissions, were not needed. As a result of removing these lines the resulting modified template focuses solely on direct GHG costs incurred by a utility. The Joint IOUs note that the modified version "...aligns with the requirements to show in the ERRR/ECAC compliance proceedings"¹⁰ the data requested by D.19-04-016.¹¹ The supplemental Advice Letter 4587-E-B et al. also included an updated notes page for Template D-2.

On October 22, 2021 SCE submitted supplemental Advice Letter 4587-E-C et al.¹² This supplemental advice letter fixed minor errors in Templates D-1 and D-2 presented in Advice Letter 4587-E-B et al. These changes did not modify the substance of the Advice Letter and included the addition of confidential shading for Line 9 of Template D-2 (to reflect the directions in the existing notes page) and the correction of line references in row 26 of Template D-1. References to "indirect and direct" costs in Template D-2 were also changed to "direct" costs to reflect the removal of indirect cost lines in agreement with Cal Advocates' protest. As Advice Letter 4587-E-C et al. included complete versions of Templates D-1, D-2, and D-3 as well as notes pages for each template, it effectively replaces the templates in Advice Letter 4587-E-B et al.

⁸ Joint IOUs reply to protest page 2.

⁹ Identical to: PG&E Advice Letter 6326-E-B, SDG&E Advice Letter 3845-E-B, Liberty Utilities Advice Letter 177-E-B, Bear Valley Electric Service Company Advice Letter 425-E-B, and PacifiCorp Advice Letter 660-E-B.

¹⁰ Advice Letter 4587-E-B page 2.

¹¹ See footnote 3.

¹² Identical to: PG&E Advice Letter 6326-E-C, SDG&E Advice Letter 3845-E-C, Liberty Utilities Advice Letter 177-E-C, Bear Valley Electric Service Company Advice Letter 425-E-C, and PacifiCorp Advice Letter 660-E-C.

Disposition:

Energy Division approves the Joint IOUs requested changes to Templates D-1 and D-2 and associated notes pages, the continued use of Template D-3 in its current form, and the removal of Templates D-4 and D-5. The changes requested by the Joint IOUs in these templates are consistent with the direction in D.21-08-026.

Changes to Template D-1 allow for calculation of a flat small business California Climate Credit equal in value to the residential credit, as ordered in D.21-08-026 ordering paragraph 6. Changes to the Clean Energy and Energy Efficiency portion of the template (Line 14) move Template D-1 into alignment with D.20-04-012 ordering paragraph 6. Changes to the notes for Line 2 clarify how to handle CARB confidential allowance allocation information. The division of total residential customers into bundled and unbundled customers in lines 21-22 provides additional detail not available elsewhere in the Forecast Erra application that allows for tracking of allocated allowance auction proceeds to different customer groups. All of these changes are consistent with the Commission authorization described at D.21-08-026 page 50 to “...facilitate the proper accounting of greenhouse gas allowance auction proceeds, calculation of credits, [and] improve the transparency of funding to programs...”

Changes to Template D-2 reflect the concerns of Cal Advocates and allow continued review of historical year-over-year GHG cost data and side-by-side comparison of forecast and recorded GHG cost data. Changes also do not impact orders in D.19-04-016 that data from Template D-2 be filed in other applications. As such, changes are consistent with the direction in D.21-08-026 at page 50 to “...review the information required in the templates to ensure it continues to be essential for the evaluation of future forecast revenue and reconciliation applications or requests.”

Similarly, the uncontested removal of Templates D-4 and D-5 is consistent with Commission authorization at D.21-08-026 page 50 to “...[remove] any templates or portions of templates that are no longer needed to properly administer the California Climate Credits.” Template D-4 and Template D-5 provided cost-in-rates information only needed for volumetric crediting which is no longer allowed under CARB regulations and removed by D.21-08-026 ordering paragraph 6. Additionally, Template D-5’s calculation of a GHG-intensity metric is inconsistent with the new GHG intensity metric that will be used in crediting as directed by ordering paragraph 4 of D.21-08-026.

Messrs. Menon, Kaushik, Kishore, Nguyen, Dietz, Anderson, and Marsh

October 26, 2021

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Sincerely,

A handwritten signature in dark ink, appearing to read "ERL (for)".

Edward Randolph

Deputy Executive Director for Energy and Climate Policy/

Director, Energy Division

cc: Service lists of: R.20-05-002
A.13-08-002
SCE GO 96-B

October 14, 2021

Advice Letter 4587-E-B
(Southern California Edison Company ID U 338 E)

Advice Letter 6326-E-B
(Pacific Gas and Electric Company ID U 39 E)

Advice Letter 3845-E-B
(San Diego Gas & Electric Company ID U 902 E)

Advice Letter 177-E-B
(Liberty Utilities (CalPeco Electric) LLC ID U 933 E)

Advice Letter 425-E-B
(Bear Valley Electric Service Company ID U 913 E)

Advice Letter 660-E-B
(PacifiCorp U 901 E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Second Supplemental Submittal to Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc., and PacifiCorp's Updates to GHG Templates

PURPOSE

In compliance with California Public Utilities Commission (CPUC or Commission) Decision (D.) 21-08-026 (Decision), Ordering Paragraph (OP) 13, Southern California Edison Company (SCE) hereby submits this supplemental advice letter on behalf of Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc. (BVES), PacifiCorp d/b/a Pacific Power (PacifiCorp), and itself (collectively, the Joint Investor Owned Utilities or Joint IOUs) to update GHG templates D-1 through D-5 in Appendix D

of D.14-10-033, and as modified in D.14-10-055 and D.15-01-024. This supplemental advice letter supplements in part and does not change the substance of the Joint IOU's Advice 4587-E-A et al.

These changes are made in accordance with General Order (GO) 96-B, General Rule 7.5.1, which authorizes a utility to make additional changes to an advice letter through the submittal of a supplemental advice letter.

BACKGROUND

Supplemental advice letter 4587-E-A was submitted on October 1, 2021, to reflect minor edits and redline and clean versions of the templates and instructions. On October 4, 2021, Cal Advocates submitted a protest of the proposed changes to Templates D-1 through D-5, agreeing with the updates proposed by the Joint IOUs except for the complete removal to Template D-2, which showed historical forecast and recorded GHG emissions and costs. Cal Advocates requested that the Joint IOUs provide a modified version of Template D-2 as it remains a requirement in each IOU's Energy Resource Recovery Account (ERRA) or Energy Cost Adjustment Clause (ECAC) filing.

DISCUSSION

Template D-2

Consistent with Cal Advocates request, Template D-2 has been modified to remove lines 9-12 and 18. The changes result in a GHG emissions table that focuses only on direct GHG emissions and costs and aligns with the requirements to show in the ERRA/ECAC compliance proceedings.

Appendix A contains both clean and redline versions of the Templates as well as the Instructions.

Template D-2: Annual GHG Emissions and Associated Costs					
Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO ₂ e)				
2	Utility Owned Generation (UOG)	-	-	-	-
3	Tolling Agreements	-	-	-	-
4	Energy Imports (Specified)	-	-	-	-
5	Energy imports (Unspecified)	-	-	-	-
6	Qualifying Facility (QF) Contracts	-	-	-	-
7	Contracts with Financial Settlement	-	-	-	-
8	Subtotal	-	-	-	-
9	Indirect GHG Emissions (MTCO ₂ e)				
10	CAISO Market Purchases	-	-	-	-
11	Contract Purchases	-	-	-	-
12	Subtotal	-	-	-	-
13	Total Emissions (MTCO ₂ e)	-	-	-	-
14	Proxy GHG Price (\$/MT)	-	-	-	-
15	GHG Costs (\$)				
16	Direct GHG Costs	-	-	-	-
17	Direct GHG Costs - Financial Settlement	-	-	-	-
18	Indirect GHG Costs	-	-	-	-
19	Previous Year's Forecast Reconciliation (Line 21)	N/A	N/A	-	-
20	Total Costs	-	-	-	-
21	Forecast Variance (\$)	N/A	-	N/A	-

CONFIDENTIAL INFORMATION

This advice letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

AUTHORIZATION

SCE submits this supplemental advice letter with authorization from PG&E, SDG&E, BVES, Liberty Utilities, and PacifiCorp.

TIER DESIGNATION

Pursuant to OP 13 of D.21-08-026, this supplemental advice letter is submitted with a Tier 2 designation, the same tier designation as Advice 4587-E et al and Advice 4587-E-A et al.

EFFECTIVE DATE

SCE requests this advice letter be effective October 14, 2021, the same effective date as the original Advice 4587-E and 4587-E-A.

PROTESTS

SCE asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 4587-E et al and not reopen the protest period. The modifications included in this supplemental advice do not make substantive changes that would affect the overall evaluation of the original advice letter, except as discussed above.

In accordance with General Rule 4 of General Order (GO) 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B, R.20-05-002, and A.13-08-002 et al service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the AL at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's website at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Matt Sheriff at (626) 302-1895 or by electronic mail at matt.sheriff@sce.com.

Southern California Edison Company

/s/ Shinjini C. Menon
Shinjini C. Menon

SCM:ms:jm
Enclosures



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Darrah Morgan

Phone #: (626) 302-2086

E-mail: AdviceTariffManager@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4587-E-B

Tier Designation: 2

Subject of AL: Second Supplemental Submittal to Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc., and PacifiCorp's Updates to GHG Templates

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 #: Decision 21-08-026

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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: 10/14/21

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

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: Shinjini C. Menon
Title: Managing Director, State Regulatory Operations
Utility Name: Southern California Edison Company
Address: 8631 Rush Street
City: Rosemead
State: California Zip: 91770
Telephone (xxx) xxx-xxxx: (626) 302-3377
Facsimile (xxx) xxx-xxxx: (626) 302-6396
Email: advicetariffmanager@sce.com

Name: Tara S. Kaushik c/o Karyn Gansecki
Title: Managing Director, Regulatory Relations
Utility Name: Southern California Edison Company
Address: 601 Van Ness Avenue, Suite 2030
City: San Francisco
State: California Zip: 94102
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx: (415) 929-5544
Email: karyn.gansecki@sce.com

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Appendix A

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Attachment D of Decision 14-10-033, as amended by advice letters listed below.

Gray shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

Advice Letter 4587-E-A/B

(Southern California Edison Company ID U 338 E)

Advice Letter 6326-E-A/B

(Pacific Gas and Electric Company ID U 39 E)

Advice Letter 3845-E-A/B

(San Diego Gas & Electric Company ID U 902 E)

Advice Letter 177-E-A/B

(Liberty Utilities (CalPeco Electric) LLC ID U 933 E)

Advice Letter 425-E-A/B

(Bear Valley Electric Service Company ID U 913 E)

Advice Letter 660-E-A/B

(PacifiCorp U 901 E)

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Proxy GHG Price (\$/MT)	-	N/A	-	N/A
2	Allocated Allowances (MT)	-	-	-	-
3	Revenues (\$)				
4	Prior Balance	N/A	N/A	-	-
5	Allowance Revenue	-	-	-	-
6	Interest	-	-	-	-
7	Franchise Fees and Uncollectibles	-	-	-	-
8	Subtotal Revenues	-	-	-	-
9	Expenses (\$)				
10	Outreach and Administrative Expenses (from Template D3)	-	-	-	-
11	Franchise Fees and Uncollectibles	-	-	-	-
12	Interest	-	-	-	-
13	Subtotal Expenses	-	-	-	-
14	Total Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (\$) (Sum of Lines 14a through 14c)	-	-	-	-
14a	Clean Energy Program XX	-	-	-	-
14b	Clean Energy Program XX	-	-	-	-
14c	Clean Energy Program XX	-	-	-	-
15	Net GHG Revenues (\$) (Line 8 + Line 13 + Line 14)	-	-	-	-
16	GHG Revenues to be Distributed in Future Years (\$)	-	-	-	-
17	Net GHG Revenues Available for Customers in Forecast Year (\$) (Line 15 + Line 16)	-	-	-	-
18	GHG Revenue Returned to Eligible EITE Customers (\$)				
19	EITE Customer Return	-	-	-	-

20	Semi-Annual Climate Credit				
21	Number of Eligible Residential Bundled Households	-	-	-	-
22	Number of Eligible Residential Unbundled Households	-	-	-	-
23	Number of Eligible Small Business Customers	-	-	-	-
24	Total Customers Eligible for Climate Credit	-	-	-	-
25	Per-Customer Semi-Annual Climate Credit (\$) (0.5 x (Line 17 + 19) ÷ Line 24)	-	-	-	-
26	Total Revenue Distributed for the Climate Credit (\$) (2 x Line 23 x Line 24)	-	-	-	-
27	Revenue Balance (\$)	-	-	-	-

Template D-2: Annual GHG Emissions and Associated Costs					
Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO2e)				
2	Utility Owned Generation (UOG)	-	-	-	-
3	Tolling Agreements	-	-	-	-
4	Energy Imports (Specified)	-	-	-	-
5	Energy imports (Unspecified)	-	-	-	-
6	Qualifying Facility (QF) Contracts	-	-	-	-
7	Contracts with Financial Settlement	-	-	-	-
8	Subtotal	-	-	-	-
9	Total Emissions (MTCO2e)	-	-	-	-
10	Proxy GHG Price (\$/MT)	-	-	-	-
11	GHG Costs (\$)				
12	Direct GHG Costs	-	-	-	-
13	Direct GHG Costs - Financial Settlement	-	-	-	-
14	Previous Year's Forecast Reconciliation (Line 16)	N/A	N/A	-	-
15	Total Costs	-	-	-	-
16	Forecast Variance (\$)	N/A	-	N/A	-

Template D-3: Detail of Outreach and Administrative Expenses

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Utility Outreach Expenses (\$)				
2	Detail of outreach activities	-	-	-	-
3	Subtotal Outreach	-	-	-	-
4	Utility Administrative Expenses (\$)				
5	Detail of administrative activities	-	-	-	-
6	Subtotal Administrative	-	-	-	-
7	Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)	-	-	-	-
8	Additional (Non-Utility) Statewide Outreach (\$)	-	-	-	-
9	Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)	-	-	-	-

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Attachment D of Decision 14-10-033, **as amended by advice letters listed below.**

Gray shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

Advice Letter 4587-E-A/B

(Southern California Edison Company ID U 338 E)

Advice Letter 6326-E-A/B

(Pacific Gas and Electric Company ID U 39 E)

Advice Letter 3845-E-A/B

(San Diego Gas & Electric Company ID U 902 E)

Advice Letter 177-E-A/B

(Liberty Utilities (CalPeco Electric) LLC ID U 933 E)

Advice Letter 425-E-A/B

(Bear Valley Electric Service Company ID U 913 E)

Advice Letter 660-E-A/B

(PacifiCorp U 901 E)

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Proxy GHG Price (\$/MT)	-	N/A	-	N/A
2	Allocated Allowances (MT)	-	-	-	-
3	Revenues (\$)				
4	Prior Balance	N/A	N/A	-	-
5	Allowance Revenue	-	-	-	-
6	Interest	-	-	-	-
7	Franchise Fees and Uncollectibles	-	-	-	-
8	Subtotal Revenues	-	-	-	-
9	Expenses (\$)				
10	Outreach and Administrative Expenses (from Template D3)	-	-	-	-
11	Franchise Fees and Uncollectibles	-	-	-	-
12	Interest	-	-	-	-
13	Subtotal Expenses	-	-	-	-
14	Total Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (\$) (Sum of Lines 14a through 14c)	-	-	-	-
14a	Clean Energy Program XX	-	-	-	-
14b	Clean Energy Program XX	-	-	-	-
14c	Clean Energy Program XX	-	-	-	-
15	Net GHG Revenues (\$) (Line 8 + Line 13 + Line 14)	-	-	-	-
16	GHG Revenues to be Distributed in Future Years (\$)	-	-	-	-
17	Net GHG Revenues Available for Customers in Forecast Year (\$) (Line 15 + Line 16)	-	-	-	-
18	GHG Revenue Returned to Eligible EITE Customers (\$)				
19	EITE Customer Return	-	-	-	-

	Small Business Volumetric Return	-	-	-	-
	Residential Volumetric Return	-	-	-	-
	Subtotal EITE + Volumetric Returns	-	-	-	-
20	Semi-Annual Climate Credit				
21	Number of Eligible Residential Bundled Households	-	-	-	-
22	Number of Eligible Residential Unbundled Households	-	-	-	-
23	Number of Eligible Small Business Customers	-	-	-	-
24	Total Customers Eligible for Climate Credit	-	-	-	-
25	Per-Household Customer Semi-Annual Climate Credit (\$) (0.5 x (Line 17 + 19) ÷ Line 24)	-	-	-	-
26	Total Revenue Distributed for the Climate Credit (\$) (2 x Line 23 x Line 24)	-	-	-	-
27	Revenue Balance (\$)	-	-	-	-

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO2e)				
2	Utility Owned Generation (UOG)	-	-	-	-
3	Tolling Agreements	-	-	-	-
4	Energy Imports (Specified)	-	-	-	-
5	Energy imports (Unspecified)	-	-	-	-
6	Qualifying Facility (QF) Contracts	-	-	-	-
7	Contracts with Financial Settlement	-	-	-	-
8	Subtotal	-	-	-	-
9	Indirect GHG Emissions (MTCO2e)				
10	CAISO Market Purchases	_____	_____	_____	_____
11	Contract Purchases	_____	_____	_____	_____
12	Subtotal	_____	_____	_____	_____
13	Total Emissions (MTCO2e)	-	-	-	-
14	Proxy GHG Price (\$/MT)	-	-	-	-
15	GHG Costs (\$)				
16	Direct GHG Costs	-	-	-	-
17	Direct GHG Costs - Financial Settlement	-	-	-	-
18	Indirect GHG Costs	_____	_____	_____	_____
19	Previous Year's Forecast Reconciliation (Line 21)	N/A	N/A	-	-
20	Total Costs	-	-	-	-
21	Forecast Variance (\$)	N/A	-	N/A	-

This template is modified per Protest of Cal Advocates to remove the indirect emissions and costs: lines 9-12 and 18.

Template D-3: Detail of Outreach and Administrative Expenses

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Utility Outreach Expenses (\$)				
2	Detail of outreach activities				
3	Subtotal Outreach				
4	Utility Administrative Expenses (\$)				
5	Detail of administrative activities	-	-	-	-
6	Subtotal Administrative	-	-	-	-
7	Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)	-	-	-	-
8	Additional (Non-Utility) Statewide Outreach (\$)	-	-	-	-
9	Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)	-	-	-	-

Template D-4: Forecast Revenue Requirement and Revenues by Rate Schedule

Rate Schedule (A)	<u>Bundled Customers</u>				<u>Unbundled Customers</u>			
	Forecast- Customer- Count Sales- (MWh) (B)	Forecast GHG- Revenue- Requirement- (\$) (C)	Rate Impact- (\$/kWh) (D)	Forecast GHG- Revenue (\$) (E)	Forecast- Customer- Count Sales- (MWh) (F)	Forecast GHG- Revenue- Requirement- (\$) (G)	Rate Impact- (\$/kWh) (H)	Forecast GHG- Revenue (\$) (I)
Insert Rate- Schedules Total								

The Joint IOUs are requesting that this Template no longer be required for GHG Climate Credit reporting, however, if it remains only minor edits are needed.

Template D-5: History of Revenue, Costs, and Emissions Intensity

Line	Year t-5	Year t-4	Year t-3	Year t-2	Year t-1	Year t
1	Total GHG Revenue (\$)					
2	Total GHG Costs (\$)					
3	Emissions Intensity (MTCO₂e/MWh)					

The Joint IOUs are requesting that this Template no longer be required for GHG Climate Credit reporting.

ATTACHMENT D

GHG Revenue and Reconciliation Application Form

Each utility should complete the templates provided in Attachment D when submitting its GHG Revenue and Reconciliation Application or request. The utility should complete the templates for the forecast year (denoted as “Year t” in the templates) and any years for which it is recording or reconciling costs and revenues.

Clarifying notes follow each template to provide guidance for completing the template.

Gray shading in the template indicates confidential information. As described in the notes that accompany each template, a utility may mark additional data as confidential, based on its set of circumstances. A.13-08-002 et al.

Via the Advice Letters below* the following changes were made to Attachment D consistent with Decision (D.) 21-08-026.

Templates D-1 and D-2 are modified as shown.

Templates D-4 and D-5 are eliminated

Template D-3 is unchanged

*Advice Letter 4587-E-B

(Southern California Edison Company ID U 338 E)

Advice Letter 6326-E-B

(Pacific Gas and Electric Company ID U 39 E)

Advice Letter 3845-E-B

(San Diego Gas & Electric Company ID U 902 E)

Advice Letter 177-E-B

(Liberty Utilities (CalPeco Electric) LLC ID U 933 E)

Advice Letter 425-E-B

(Bear Valley Electric Service Company ID U 913 E)

Advice Letter 660-E-B

(PacifiCorp U 901 E)

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Proxy GHG Price (\$/MT)	-	N/A	-	N/A
2	Allocated Allowances (MT)	-	-	-	-
3	Revenues (\$)				
4	Prior Balance	N/A	N/A	-	-
5	Allowance Revenue	-	-	-	-
6	Interest	-	-	-	-
7	Franchise Fees and Uncollectibles	-	-	-	-
8	Subtotal Revenues	-	-	-	-
9	Expenses (\$)				
10	Outreach and Administrative Expenses (from Template D3)	-	-	-	-
11	Franchise Fees and Uncollectibles	-	-	-	-
12	Interest	-	-	-	-
13	Subtotal Expenses	-	-	-	-
14	Total Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (\$) (Sum of Lines 14a through 14c)	-	-	-	-
14a	Clean Energy Program XX	-	-	-	-
14b	Clean Energy Program XX	-	-	-	-
14c	Clean Energy Program XX	-	-	-	-
15	Net GHG Revenues (\$) (Line 8 + Line 13 + Line 14)	-	-	-	-
16	GHG Revenues to be Distributed in Future Years (\$)	-	-	-	-
17	Net GHG Revenues Available for Customers in Forecast Year (\$) (Line 15 + Line 16)	-	-	-	-
18	GHG Revenue Returned to Eligible EITE Customers (\$)				
19	EITE Customer Return	-	-	-	-
20	Semi-Annual Climate Credit				
21	Number of Eligible Residential Bundled Households	-	-	-	-
22	Number of Eligible Residential Unbundled Households	-	-	-	-
23	Number of Eligible Small Business Customers	-	-	-	-
24	Total Customers Eligible for Climate Credit	-	-	-	-
25	Per-Customer Semi-Annual Climate Credit (\$) (0.5 x (Line 17 + 19) ÷ Line 24)	-	-	-	-
26	Total Revenue Distributed for the Climate Credit (\$) (2 x Line 23 x Line 24)	-	-	-	-
27	Revenue Balance (\$)	-	-	-	-

***Template D-1 Notes**

Line 1: Proxy GHG Price

- The forward ICE settlement price of GHG allowances of the forecast year's vintage with December delivery of the forecast year, with a quote date consistent with natural gas and power price forward curves used in the ERRR/ECAC forecast.
- Proxy GHG Price is applicable to the forecast column only.
- Proxy GHG Price was not used prior to 2015.

Line 2: Allocated Allowances

- Number of allowances the California Air Resources Board allocates to each utility on behalf of its customers.
- Number of forecast allocated allowances should not be adjusted for the Energy Imbalance Market (EIM) Purchaser Emission adjustments by the CARB to any individual utility.
- At the conclusion of all annual allowance auctions, the recorded allocated allowances may be adjusted net of the EIM adjustments in any future ERRR Forecast filing to reflect the net number of allowances that each utility submitted for auction.

Line 3: Revenues

- Revenue from selling 100% of allocated allowances.
- If a utility records revenues received as negative values in this template, it should record expenses and revenues returned as positive values.

Line 4: Prior Balance

- Forecasted or recorded end-of-year balance in each utility's respective GHG revenue balancing account.
- Not applicable to 2013, as there was no balance prior to 2013.

Line 5: Allowance Revenue

- Forecast Allowance Revenue equals the Proxy GHG Price multiplied by the number of Allocated Allowances to the utility in a given year.
- Recorded Allowance Revenue is the total value of allowances consigned and sold at auction for a given year.

Line 6: Interest

- Recorded Interest is the interest booked to the revenue balancing account.

Line 7: Franchise Fees and Uncollectibles

- Calculated by multiplying the utility's GRC-authorized FF&U factor by the allowance revenue (including any interest).

Lines 10-12: Expenses

- Recorded Expenses reflect actual expenses recorded by filing date plus additional estimated year-end recorded expenses.

Line 10: Outreach and Administrative Expenses

- Utilities enter the total from Template D3 on this line, net of any balance in the outreach expense memorandum account or administrative expense balancing account. Note any previous year's balance applied here.

Line 11: Franchise Fees and Uncollectibles

- If a utility calculates expense-related FF&Us separately from Revenue FF&Us above, utility will enter that number here.
- Calculated by multiplying the utility's GRC-authorized FF&U factor by the outreach and administrative expenses.

Line 12: Interest

- If applicable.

Line 14 a-c: Allowance Revenue Approved for Clean Energy or EE Programs, per D.20-04-012, Ordering Paragraph #6

- Amount of revenue, if any, that the Commission has authorized in other proceedings to fund clean energy or EE programs.
- Utilities will enter Clean Energy programs separately in Lines 14a-c with additional lines as needed, which will sum on Line 14.

Line 15: Net GHG Revenues Available for Customers

- Revenue net of Expenses and Allowance Revenue for Clean Energy or EE.

Line 16: GHG Revenues to be Distributed in Future Years

- Of GHG Revenues collected in 2013, 50% is to be returned to customers in 2014 and 50% in 2015. These revenues are held in the utility's balancing account until they are distributed. When reporting recorded 2013 and 2014 revenues, and for the 2015 forecast year, the utility will indicate the amount of collected GHG revenues that will remain in the balancing account to be distributed in future years. This line can be omitted beginning in the 2016 forecast year after all revenue from 2013 and 2014 has been amortized in rates.

Line 18: GHG Revenue Returned to Eligible EITE Customers

- Recorded revenue returned to eligible customers should reflect recorded revenue returned to customers as of the filing date as well as estimated year-end recorded revenue returned to customers.

Line 19: EITE Customer Return

- As the revenue allocation formula and distribution methodologies for emissions intensive and trade exposed (EITE) customers has not been finalized as of the mailing of this decision, the forecast is based on total sales to expected bundled and unbundled EITE-eligible customers multiplied by the GHG cost in rates for these customers.
- Once EITE customers have begun receiving an EITE return, the forecast return is based on the recorded prior-year revenue returned to EITE customers.

Line 20 Semi-Annual Climate Credit

- This section calculates both the semi-annual Climate Credit and the Total Revenue Distributed for the Climate Credit.

Lines 21-24 Customer Count for Eligible Customers

- Utilities provide a separate customer count for eligible bundled and unbundled residential customers, and small business customers.
- Multiplying the customer count by two times the semi-annual Climate Credit yields the total Climate Credit revenue forecasted to be returned to that customer class.

Line 25: Per-Customer Semi-Annual Climate Credit

- The recorded amount exactly equals the forecast for that year, as the forecast is used to calculate the amount of the Climate Credit.

Line 26: Total Revenue Distributed for the Climate Credit

- Forecast Revenue Distributed for the Climate Credit is the net allowance revenue available for customers less the subtotal of EITE and volumetric revenue returns.
- Recorded Revenue Distributed for the Climate Credit is the actual amount returned to all households.

Line 27: Revenue Balance

- The recorded Revenue Balance will be the known or estimated amount recorded in the utility's respective balancing account on December 31 of that year.
- Only applicable to the recorded column.
- The Revenue Balance at the end of one year then becomes the Prior Balance (line 4) of the next year.

Template D-2: Annual GHG Emissions and Associated Costs					
Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO2e)				
2	Utility Owned Generation (UOG)	-	-	-	-
3	Tolling Agreements	-	-	-	-
4	Energy Imports (Specified)	-	-	-	-
5	Energy imports (Unspecified)	-	-	-	-
6	Qualifying Facility (QF) Contracts	-	-	-	-
7	Contracts with Financial Settlement	-	-	-	-
8	Subtotal	-	-	-	-
9	Total Emissions (MTCO2e)	-	-	-	-
10	Proxy GHG Price (\$/MT)	-	-	-	-
11	GHG Costs (\$)				
12	Direct GHG Costs	-	-	-	-
13	Direct GHG Costs - Financial Settlement	-	-	-	-
14	Previous Year's Forecast Reconciliation (Line 16)	N/A	N/A	-	-
15	Total Costs	-	-	-	-
16	Forecast Variance (\$)	N/A	-	N/A	-

****Template D-2 Notes**

Line 1: Direct GHG Emissions

- Direct GHG Emissions are confidential.
- Utilities will provide data for all categories of Direct GHG Emissions that are applicable to their operations.
- If a utility is a multi-jurisdictional retail provider (MJRP) that reports MJRP emissions, the utility shall add a line under Direct GHG Emissions to include MJRP emissions. This value is confidential.

Line 2: Utility Owned Generation

- Emissions based on forecasted or actual plant output, the facility-specific heat rate assumption, and ARB-specified emissions factors for fuels.
- This value is confidential.

Line 3: Tolling Agreements

- Emissions based on forecasted or actual plant output purchased by utility, the contract-specific heat rate assumption, and ARB-specified emissions factors for fuels.
- This value is confidential.

Line 4: Energy Imports (Specified)

- Emissions based on forecasted or actual plant output purchased by utility and the facility-specific emissions factor.
- This value is confidential.

Line 5: Energy Imports (Unspecified)

- Emissions based on forecasted or actual plant output purchased by utility, the ARB emissions factor for unspecified imports, the ARB transmission loss correction factor, and any applicable RPS adjustment.
- This value is confidential.

Line 6: Qualifying Facility Contracts

- Physically settled emissions based on forecasted or actual plant output purchased by utility and the contract-specific settlement terms.
- This value is confidential.

Line 7: Contract with Financial Settlement

- Emissions from utility contracts in which the utility is responsible for providing financial settlement specifically for GHG costs. At its discretion, the utility may choose instead to record financially settled emissions as a new row under Indirect GHG Emissions.
- This value is confidential.

Line 8: Subtotal

- This value is confidential.

Line 9: Total Emissions

- Total of direct and indirect emissions.

- This value is confidential if a utility has only direct emissions, because it would reveal their direct compliance exposure.

Line 10: Proxy GHG Price

- The forecast Proxy GHG Price is used to forecast Direct GHG Costs and Indirect GHG Costs.
- The forecast Proxy GHG Price is the forward ICE settlement price with December delivery of the forecast year, with a quote date consistent with natural gas and power price forward curves used in the ERRR/ECAC forecast. This value is public. PG&E separately calculates a confidential GHG price which it uses to forecast procurement costs for ratemaking purposes in the ERRR forecast proceeding.
- PG&E must use a confidential internal GHG allowance price forecast for the Proxy GHG Price if this is consistent with its ERRR methodology.
- The recorded Proxy GHG Price is used to calculate the recorded Indirect GHG Costs. The value is the average of the daily published prices of the California System Operator (CAISO) GHG Allowance Price Index for that year. This value is public.

Line 12: Direct GHG Costs

- The Direct GHG Costs included the cost of Direct GHG Emissions in Lines 2 through 7 only.
- Forecast direct costs are the Forecasted Proxy Price (or confidential price for PG&E) multiplied by forecasted direct emissions.
- Recorded direct costs are the sum of each month's WAC of compliance instrument inventory multiplied by that month's actual direct emissions, as shown in Template C.
- These values are confidential to avoid revealing a utility's Direct GHG Emissions.

Line 13: Direct GHG Costs - Financial Settlement

- The Direct GHG Costs for Contracts with Financial Settlement include the cost of Direct GHG Emissions in Line 7.
- Forecast direct costs with financial settlement are the Forecast Proxy Price (or confidential price for PG&E) multiplied by forecast direct emissions.
- Recorded direct costs are the sum of each month's cost of financially settling the GHG cost component of contracts.
- These values are confidential to avoid revealing a utility's Direct GHG Emissions.

Line 14: Previous Year's Forecast Reconciliation

- Equals Forecast Variance (line 20) from the year the utility is reconciling.
- This value is confidential if the previous year's Forecast Variance is confidential.

Line 15: Total Costs

- Forecast of total costs are confidential if utility uses a confidential price for its Forecast Proxy Price (line 14). In that case, utility's GHG application must include an illustrative public GHG cost using the public forecast proxy price.
- This value is also confidential if a utility has only direct costs.

Line 16: Forecast Variance

- Total recorded costs minus total forecasted costs for the year.
- If the forecast of Total Costs (line20) is confidential, the forecast variance is also confidential.

Template D-3: Detail of Outreach and Administrative Expenses

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Utility Outreach Expenses (\$)				
2	Detail of outreach activities	-	-	-	-
3	Subtotal Outreach	-	-	-	-
4	Utility Administrative Expenses (\$)				
5	Detail of administrative activities	-	-	-	-
6	Subtotal Administrative	-	-	-	-
7	Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)	-	-	-	-
8	Additional (Non-Utility) Statewide Outreach (\$)	-	-	-	-
9	Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)	-	-	-	-

***Template D-3 Notes

Lines 1-3: Utility Outreach Expenses

- Utilities provide detail on the categories of outreach activities they forecast and actually work on.
- Examples of outreach categories include customer call center outreach, internal marketing efforts, printed materials, postage, and contracts with external marketing consultants.
- Utilities will insert line items to account for applicable outreach sub-categories, including the examples listed here and any other relevant sub-categories.

Lines 4-6: Utility Administrative Expenses

- Utilities provide detail on the type of administrative activities they forecast and actually complete.
- Examples of administrative work include general program management, IT enhancements, billing system enhancements, IT program management and oversight, and customer call center training.
- Utilities will insert line items to account for applicable administrative sub-categories, including the examples listed here and any other relevant sub-categories.

Line 8: Additional (Non-Utility) Statewide Outreach

- Utility’s portion of expenses for a third-party to support statewide outreach.

ATTACHMENT D

GHG Revenue and Reconciliation Application Form

Each utility should complete the ~~five~~ templates provided in Attachment D when submitting its GHG Revenue and Reconciliation Application or request. The utility should complete the templates for the forecast year (denoted as “Year t” in the templates) and any years for which it is recording or reconciling costs and revenues.

Clarifying notes follow each template to provide guidance for completing the template.

Gray shading in the template indicates confidential information. As described in the notes that accompany each template, a utility may mark additional data as confidential, based on its set of circumstances. A.13-08-002 et al.

Via the Advice Letters below* the following changes were made to Attachment D consistent with Decision (D.) 21-08-026.

Templates D-1 and D-2 are modified as shown.

Templates D-4 and D-5 are eliminated

Template D-3 is unchanged

*Advice Letter 4587-E-B

(Southern California Edison Company ID U 338

E)

Advice Letter 6326-E-B

(Pacific Gas and Electric Company ID U 39 E)

Advice Letter 3845-E-B

(San Diego Gas & Electric Company ID U 902 E)

Advice Letter 177-E-B

(Liberty Utilities (CalPeco Electric) LLC ID U 933

E)

Advice Letter 425-E-B

(Bear Valley Electric Service Company ID U 913

E)

Advice Letter 660-E-B

(PacifiCorp U 901 E)

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description		Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Proxy GHG Price (\$/MT)	-	N/A	-	N/A
2	Allocated Allowances (MT)	-	-	-	-
3	Revenues (\$)				
4	Prior Balance	N/A	N/A	-	-
5	Allowance Revenue	-	-	-	-
6	Interest	-	-	-	-
7	Franchise Fees and Uncollectibles	-	-	-	-
8	Subtotal Revenues	-	-	-	-
9	Expenses (\$)				
10	Outreach and Administrative Expenses (from Template D3)	-	-	-	-
11	Franchise Fees and Uncollectibles	-	-	-	-
12	Interest	-	-	-	-
13	Subtotal Expenses	-	-	-	-
14	Total Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (\$) (Sum of Lines 14a through 14c)	-	-	-	-
14a	Clean Energy Program XX	-	-	-	-
14b	Clean Energy Program XX	-	-	-	-
14c	Clean Energy Program XX	-	-	-	-
15	Net GHG Revenues (\$) (Line 8 + Line 13 + Line 14)	-	-	-	-
16	GHG Revenues to be Distributed in Future Years (\$)	-	-	-	-
17	Net GHG Revenues Available for Customers in Forecast Year (\$) (Line 15 + Line 16)	-	-	-	-
18	GHG Revenue Returned to Eligible EITE Customers (\$)				
19	EITE Customer Return	-	-	-	-
	Small Business Volumetric Return	-	-	-	-
	Residential Volumetric Return	-	-	-	-
	Subtotal EITE + Volumetric Returns	-	-	-	-
20	Semi-Annual Climate Credit				
21	Number of Eligible Residential Bundled Households	-	-	-	-
22	Number of Eligible Residential Unbundled Households	-	-	-	-
23	Number of Eligible Small Business Customers	-	-	-	-
24	Total Customers Eligible for Climate Credit	-	-	-	-
25	Per-Household Customer Semi-Annual Climate Credit (\$) (0.5 x (Line 17 + 19) ÷ Line 24)	-	-	-	-
26	Total Revenue Distributed for the Climate Credit (\$) (2 x Line 23 x Line 24)	-	-	-	-
27	Revenue Balance (\$)	-	-	-	-

***Template D-1 Notes**

Line 1: Proxy GHG Price

- The forward ICE settlement price of GHG allowances of the forecast year's vintage with December delivery of the forecast year, with a quote date consistent with natural gas and power price forward curves used in the ERRA/ECAC forecast.
- Proxy GHG Price is applicable to the forecast column only.
- Proxy GHG Price was not used prior to 2015.

Line 2: Allocated Allowances

- Number of allowances the California Air Resources Board allocates to each utility on behalf of its customers.
- Number of forecast allocated allowances should not be adjusted for the Energy Imbalance Market (EIM) Purchaser Emission adjustments by the CARB to any individual utility.
- At the conclusion of all annual allowance auctions, the recorded allocated allowances may be adjusted net of the EIM adjustments in any future ERRA Forecast filing to reflect the net number of allowances that each utility submitted for auction.

Line 3: Revenues

- Revenue from selling 100% of allocated allowances.
- If a utility records revenues received as negative values in this template, it should record expenses and revenues returned as positive values.

Line 4: Prior Balance

- Forecasted or recorded end-of-year balance in each utility's respective GHG revenue balancing account.
- Not applicable to 2013, as there was no balance prior to 2013.

Line 5: Allowance Revenue

- Forecast Allowance Revenue equals the Proxy GHG Price multiplied by the number of Allocated Allowances to the utility in a given year.
- Recorded Allowance Revenue is the total value of allowances consigned and sold at auction for a given year.

Line 6: Interest

- Recorded Interest is the interest booked to the revenue balancing account.

Line 7: Franchise Fees and Uncollectibles

- Calculated by multiplying the utility's GRC-authorized FF&U factor by the allowance revenue (including any interest).

Lines 10-12: Expenses

- Recorded Expenses reflect actual expenses recorded by filing date plus additional estimated year-end recorded expenses.

Line 10: Outreach and Administrative Expenses

- Utilities enter the total from Template D3 on this line, net of any balance in the outreach expense memorandum account or administrative expense balancing account. Note any previous year's balance applied here.

Line 11: Franchise Fees and Uncollectibles

- If a utility calculates expense-related FF&Us separately from Revenue FF&Us above, utility will enter that number here.
- Calculated by multiplying the utility's GRC-authorized FF&U factor by the outreach and administrative expenses.

Line 12: Interest

- If applicable.

Line 14 **a-c**: Allowance Revenue Approved for Clean Energy or EE Programs, **per D.20-04-012, Ordering Paragraph #6**

- Amount of revenue, if any, that the Commission has authorized in other proceedings to fund clean energy or EE programs.
- **Utilities will enter Clean Energy programs separately in Lines 14a-c with additional lines as needed, which will sum on Line 14.**

Line 15: Net GHG Revenues Available for Customers

- Revenue net of Expenses and Allowance Revenue for Clean Energy or EE.

Line 16: GHG Revenues to be Distributed in Future Years

- Of GHG Revenues collected in 2013, 50% is to be returned to customers in 2014 and 50% in 2015. These revenues are held in the utility's balancing account until they are distributed. When reporting recorded 2013 and 2014 revenues, and for the 2015 forecast year, the utility will indicate the amount of collected GHG revenues that will remain in the balancing account to be distributed in future years. This line can be omitted beginning in the 2016 forecast year after all revenue from 2013 and 2014 has been amortized in rates.

Line **18-21**: GHG Revenue Returned to Eligible **EITE** Customers

- Recorded revenue returned to eligible customers should reflect recorded revenue returned to customers as of the filing date as well as estimated year-end recorded revenue returned to customers.

Line 19: EITE Customer Return

- As the revenue allocation formula and distribution methodologies for emissions intensive and trade exposed (EITE) customers has not been finalized as of the mailing of this decision, the forecast is based on total sales to expected bundled and unbundled EITE-eligible customers multiplied by the GHG cost in rates for these customers.
- Once EITE customers have begun receiving an EITE return, the forecast return is based on the recorded prior-year revenue returned to EITE customers.

Line 20 Semi-Annual Climate Credit

- This section calculates both the semi-annual Climate Credit and the Total Revenue Distributed for the Climate Credit.

Lines 21-24 Customer Count for Eligible Customers

- Utilities provide a separate customer count for eligible bundled and unbundled residential customers, and small business customers.
- Multiplying the customer count by two times the semi-annual Climate Credit yields the total Climate Credit revenue forecasted to be returned to that customer class.

~~Line 20: Small Business Volumetric Return~~

~~• Forecast based on expected bundled and unbundled sales to small business customers multiplied by forecast volumetric GHG costs in rates and appropriate assistance factors.~~

~~Line 21: Residential Volumetric Return~~

~~• Forecast based on expected bundled and unbundled sales to residential customers multiplied by the volumetric GHG costs in rates.~~

Line 25: Per-Customer ~~Household~~ Semi-Annual Climate Credit

- The recorded amount exactly equals the forecast for that year, as the forecast is used to calculate the amount of the Climate Credit.

Line 26: **Total** Revenue Distributed for the Climate Credit

- Forecast Revenue Distributed for the Climate Credit is the net allowance revenue available for customers less the subtotal of EITE and volumetric revenue returns.
- Recorded Revenue Distributed for the Climate Credit is the actual amount returned to all households.

Line 27: Revenue Balance

- The recorded Revenue Balance will be the known or estimated amount recorded in the utility's respective balancing account on December 31 of that year.
- Only applicable to the recorded column.
- The Revenue Balance at the end of one year then becomes the Prior Balance (line 4) of the next year.

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO2e)				
2	Utility Owned Generation (UOG)	-	-	-	-
3	Tolling Agreements	-	-	-	-
4	Energy Imports (Specified)	-	-	-	-
5	Energy imports (Unspecified)	-	-	-	-
6	Qualifying Facility (QF) Contracts	-	-	-	-
7	Contracts with Financial Settlement	-	-	-	-
8	Subtotal	-	-	-	-
9	Indirect GHG Emissions (MTCO2e)				
10	CAISO Market Purchases	-	-	-	-
11	Contract Purchases	-	-	-	-
12	Subtotal	-	-	-	-
13	Total Emissions (MTCO2e)	-	-	-	-
14	Proxy GHG Price (\$/MT)	-	-	-	-
15	GHG Costs (\$)				
16	Direct GHG Costs	-	-	-	-
17	Direct GHG Costs - Financial Settlement	-	-	-	-
18	Indirect GHG Costs	-	-	-	-
19	Previous Year's Forecast Reconciliation (Line 21)	N/A	N/A	-	-
20	Total Costs	-	-	-	-
21	Forecast Variance (\$)	N/A	-	N/A	-

****Template D-2 Notes**

Line 1: Direct GHG Emissions

- Direct GHG Emissions are confidential.
- Utilities will provide data for all categories of Direct GHG Emissions that are applicable to their operations.
- If a utility is a multi-jurisdictional retail provider (MJRP) that reports MJRP emissions, the utility shall add a line under Direct GHG Emissions to include MJRP emissions. This value is confidential.

Line 2: Utility Owned Generation

- Emissions based on forecasted or actual plant output, the facility-specific heat rate assumption, and ARB-specified emissions factors for fuels.
- This value is confidential.

Line 3: Tolling Agreements

- Emissions based on forecasted or actual plant output purchased by utility, the contract-specific heat rate assumption, and ARB-specified emissions factors for fuels.
- This value is confidential.

Line 4: Energy Imports (Specified)

- Emissions based on forecasted or actual plant output purchased by utility and the facility-specific emissions factor.
- This value is confidential.

Line 5: Energy Imports (Unspecified)

- Emissions based on forecasted or actual plant output purchased by utility, the ARB emissions factor for unspecified imports, the ARB transmission loss correction factor, and any applicable RPS adjustment.
- This value is confidential.

Line 6: Qualifying Facility Contracts

- Physically settled emissions based on forecasted or actual plant output purchased by utility and the contract-specific settlement terms.

- This value is confidential.

Line 7: Contract with Financial Settlement

- Emissions from utility contracts in which the utility is responsible for providing financial settlement specifically for GHG costs. At its discretion, the utility may choose instead to record financially settled emissions as a new row under Indirect GHG Emissions.
- This value is confidential.

Line 8: Subtotal

- This value is confidential.

~~Line 9: Indirect GHG Emissions~~

- ~~• Because Total Emissions are public except when a utility only reports direct emissions, Indirect GHG Emissions must be confidential to avoid revealing Direct GHG Emissions.~~
- ~~• Utilities will provide data for all categories of Indirect GHG Emissions that are applicable to their operations. Utilities that have no Indirect Emissions do not need to complete this section.~~

~~Line 10: CAISO Market Purchases~~

- ~~• Emissions based on net market energy purchases and either ARB's emission factor for generic system power or a market heat rate implied emission factor.~~
- ~~• This value is confidential.~~

~~Line 11: Contract Purchases~~

- ~~• Emissions based on forecasted or actual plant output purchased by the utility and contract specific settlement terms.~~
- ~~• This value is confidential.~~

~~Line 12: Subtotal~~

- ~~• This value is confidential.~~

Line 13: Total Emissions

- Total of direct and indirect emissions.
- This value is confidential if a utility has only direct emissions, because it would reveal their direct compliance exposure.

Line 14: Proxy GHG Price

- The forecast Proxy GHG Price is used to forecast Direct GHG Costs and Indirect GHG Costs.
- The forecast Proxy GHG Price is the forward ICE settlement price with December delivery of the forecast year, with a quote date consistent with natural gas and power price forward curves used in the ERRR/ECAC forecast. This value is public. PG&E separately calculates a confidential GHG price which it uses to forecast procurement costs for ratemaking purposes in the ERRR forecast proceeding.
- PG&E must use a confidential internal GHG allowance price forecast for the Proxy GHG Price if this is consistent with its ERRR methodology.
- The recorded Proxy GHG Price is used to calculate the recorded Indirect GHG Costs. The value is the average of the daily published prices of the California System Operator (CAISO) GHG Allowance Price Index for that year. This value is public.

Line 16: Direct GHG Costs

- The Direct GHG Costs included the cost of Direct GHG Emissions in Lines 2 through 7 only.
- Forecast direct costs are the Forecasted Proxy Price (or confidential price for PG&E) multiplied by forecasted direct emissions.
- Recorded direct costs are the sum of each month's WAC of compliance instrument inventory multiplied by that month's actual direct emissions, as shown in Template C.
- These values are confidential to avoid revealing a utility's Direct GHG Emissions.

Line 17: Direct GHG Costs - Financial Settlement

- The Direct GHG Costs for Contracts with Financial Settlement include the cost of Direct GHG Emissions in Line 7.
- Forecast direct costs with financial settlement are the Forecast Proxy Price (or confidential price for PG&E) multiplied by forecast direct emissions.
- Recorded direct costs are the sum of each month's cost of financially settling the GHG cost component of contracts.

- These values are confidential to avoid revealing a utility's Direct GHG Emissions.

~~Line 18: Indirect GHG Costs (\$)~~

- ~~• Forecast Indirect GHG Costs are the Forecast Proxy Price multiplied by forecast subtotal of Indirect GHG Emissions.~~
- ~~• Recorded Indirect GHG Costs equal the subtotal of Indirect GHG Emissions multiplied by annual average of CAISO's daily GHG Allowance Price Index computed by averaging the published daily price for the recorded year and dividing by the number of days in that year.~~

Line 19: Previous Year's Forecast Reconciliation

- Equals Forecast Variance (line 20) from the year the utility is reconciling.
- This value is confidential if the previous year's Forecast Variance is confidential.

Line 20: Total Costs

- Forecast of total costs are confidential if utility uses a confidential price for its Forecast Proxy Price (line 14). In that case, utility's GHG application must include an illustrative public GHG cost using the public forecast proxy price.
- This value is also confidential if a utility has only direct costs.

Line 21: Forecast Variance

- Total recorded costs minus total forecasted costs for the year.
- If the forecast of Total Costs (line 20) is confidential, the forecast variance is also confidential.

Template D-3: Detail of Outreach and Administrative Expenses

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Utility Outreach Expenses (\$)				
2	Detail of outreach activities	-	-	-	-
3	Subtotal Outreach	-	-	-	-
4	Utility Administrative Expenses (\$)				
5	Detail of administrative activities	-	-	-	-
6	Subtotal Administrative	-	-	-	-
7	Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)	-	-	-	-
8	Additional (Non-Utility) Statewide Outreach (\$)	-	-	-	-
9	Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)	-	-	-	-

***Template D-3 Notes

Lines 1-3: Utility Outreach Expenses

- Utilities provide detail on the categories of outreach activities they forecast and actually work on.
- Examples of outreach categories include customer call center outreach, internal marketing efforts, printed materials, postage, and contracts with external marketing consultants.
- Utilities will insert line items to account for applicable outreach sub-categories, including the examples listed here and any other relevant sub-categories.

Lines 4-6: Utility Administrative Expenses

- Utilities provide detail on the type of administrative activities they forecast and actually complete.
- Examples of administrative work include general program management, IT enhancements, billing system enhancements, IT program management and oversight, and customer call center training.
- Utilities will insert line items to account for applicable administrative sub-categories, including the examples listed here and any other relevant sub-categories.

Line 8: Additional (Non-Utility) Statewide Outreach

- Utility’s portion of expenses for a third-party to support statewide outreach.

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP Energy Management Service Engineers and Scientists of California	Pioneer Community Energy Public Advocates Office
Alta Power Group, LLC Anderson & Poole		Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc. SCD Energy Solutions San Diego Gas & Electric Company
Atlas ReFuel BART	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF IGS Energy International Power Technology	SPURR San Francisco Water Power and Sewer Semptra Utilities
Barkovich & Yap, Inc. California Cotton Ginners & Growers Assn California Energy Commission	Intertie	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.
California Hub for Energy Efficiency Financing	Intestate Gas Services, Inc. Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McKenzie & Associates	
Cameron-Daniel, P.C. Casner, Steve Cenergy Power Center for Biological Diversity	Modesto Irrigation District NLine Energy, Inc. NRG Solar	
Chevron Pipeline and Power City of Palo Alto	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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		