

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6327E
As of December 7, 2021

Subject: Implementing the 2019 Energy Resource Recovery Account (ERRA) Compliance Revenue Requirement in Compliance with Decision 21-07-013

Division Assigned: Energy

Date Filed: 09-14-2021

Date to Calendar: 09-17-2021

Authorizing Documents: D2107013

Disposition:	Accepted
Effective Date:	09-14-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov



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

September 14, 2021

Advice 6327-E

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

Subject: **Implementing the 2019 Energy Resource Recovery Account (ERRA) Compliance Revenue Requirement in Compliance with Decision 21-07-013**

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits its compliance advice letter pursuant to Ordering Paragraph (OP) 4 of Decision (D.) 21-07-013 (the “2019 ERRA Compliance Decision”). PG&E requests approval to implement the 2019 Energy Resource Recovery Account (ERRA) Compliance revenue requirement, including a report that PG&E transferred \$95.3 million, including any associated interest retroactive to January 2019, from the Portfolio Allocation Balancing Account (PABA) to the ERRA, as a result of updating the Retained Renewables Portfolio Standard (RPS) adjustment with actual 2019 recorded sales data, and Diablo Canyon Seismic Studies Balancing Account (DCSSBA) cost recovery of \$3.996 million (2019 recorded DCSSBA costs including interest).

Background

On July 16, 2021, the California Public Utilities Commission (Commission or CPUC) issued D.21-07-013 approving PG&E’s 2019 ERRA Compliance Application (A.20-02-009), with modifications. In OPs 2 and 3 of the 2019 ERRA Compliance Decision, the Commission authorized the following: (1) PG&E shall transfer \$95.3 million, including any associated interest retroactive to January 2019, from the PABA to the ERRA, to update the Retained RPS adjustment that was ordered in D.20-02-047 with actual 2019 recorded sales data; and (2) PG&E to recover \$3.996 million in revenue requirement for seismic study costs recorded in the DCSSBA.

D.21-07-013 Authorization and Modifications to PG&E's Revenue Requirements and Rate Proposals

The revenue requirements and illustrative total rates included herein incorporate the following modifications addressed in the 2019 ERRR Compliance Decision:

1. PG&E Transferred \$95.3 Million, Including any Associated Interest Retroactive to January 2019, from the PABA to the ERRR, to Update the Retained RPS Adjustment that was ordered in D.20-02-047
 - PG&E confirms that it transferred at least \$95.3 million, including any associated interest retroactive to January 2019, from the PABA to the ERRR, to update the Retained RPS adjustment that was ordered in D.20-02-047.

2. DCSSBA Cost Recovery
 - PG&E will recover \$3.996 million in revenue requirement for seismic study costs recorded in the DCSSBA in the upcoming Annual Electric True Up (AET) advice letter, and has recorded this entry in July 2021.

Implementation of these modifications is described below.

Retained RPS Entries

Table 1 below shows PG&E's retained RPS volumes and values that were transferred from PABA to ERRR related to 2019 record (trade) period. The table begins with the 2019 accounting entries presented in PG&E Table 2-1 of its Supplemental Testimony, and includes all relevant accounting adjustments that occurred in 2020 to true-up retained RPS values for the 2019 trade period, and notes related to how any applicable interest was treated in compliance with D.21-07-013. The activity recorded during the 2020 record period in Lines 2 and 3 in combination transfer at least \$95.3 million from PABA to ERRR.

TABLE 1

Retained RPS Entries to PABA		GWh	\$ Millions
Line 1	As of December 2019	5,352	\$87.98
Line 2	D.20-02-047 entries	5,651	\$92.90
Line 3	True-ups Recorded in 2020	258	\$4.24
Line 4	Sum of 2020 Entries (Line 2 + Line 3)	5,909	\$97.14
Line 5	Total 2019 Entries (Line 1 + Line 4)	11,261	\$185.12

Line 1 includes the amounts presented in PG&E's Table 2-1 in its Supplemental Testimony. These amounts were recorded as energy was procured. All activity recorded to balancing accounts accrue interest commensurate with the 3-month commercial paper rate as identified with Federal Statistical Release H-15, as authorized by the Commission.

Line 2 represents entries recorded during March and August 2020 in compliance with D.20-02-047. Prior period interest was also recorded from December 2019 until the time of the entry. This period of interest is appropriate as December 2019 is the date that PG&E made its final Unsold RPS and other year-end adjustments related to retained RPS values.

Line 3 represents additional true-ups recorded during the 2020 accounting year. In the normal course of business, PG&E adjusts accounting entries for updated settlement and meter data as provided by counterparties and validating entities. For Retained RPS, PG&E records amounts in compliance with D.19-10-001 for procured RPS contracts. Then, after 4 months, it adjusts the amounts for the final REC volumes validated by WREGIS. WREGIS also may update the amount of RECs validated for PG&E (or any entity) due to factors such as updated CAISO meter data. As such entries are triggered by available information and recorded as true-ups on a recurring basis (similar to billing data or other contract and CAISO settlements), no prior period interest is accrued for these entries.

DCSSBA Cost Recovery

PG&E will recover \$3.996 million in revenue requirement for seismic study costs recorded in the DCSSBA in the upcoming Annual Electric True Up (AET) advice letter, and has recorded this entry in July 2021.

This Advice Letter is submitted in compliance with this requirement. There are no tariff sheets submitted with this advice letter because no changes to PG&E's tariffs are required due to D.21-07-013.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **October 4, 2021**, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 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

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

Effective Date

PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is **September 14, 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 **A.20-02-009**. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6327-E

Tier Designation: 1

Subject of AL: Implementing the 2019 Energy Resource Recovery Account (ERRA) Compliance Revenue Requirement in Compliance with Decision 21-07-013

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.21-07-013

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 9/14/21

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