

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 22, 2021

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B13U  
P.O. Box 770000  
San Francisco, CA 94177

Dear Mr. Jacobson,

Pacific Gas and Electric Company (PG&E) demonstrated that it met the local RA obligation in the aggregated PG&E Other local areas. But, PG&E has not met its remaining December 2021 month-ahead local RA obligation. On October 18, 2021, PG&E filed a waiver request via Advice Letter 6370-E for its remaining December 2021 month-ahead local Resource Adequacy (RA) requirements - for one local area. Energy Division staff grants the waiver request for the reasons explained, below.

Commission Decision (D.) 06-06-064 established waiver provisions for local Resource Adequacy (RA) procurement. D.20-06-031 established criteria for fulfilling local RA obligations in the six disaggregated PG&E Other local areas. D.20-06-031 also established 2021 compliance year obligations for all Load Serving Entities (LSEs). On October 18, 2021, PG&E submitted its December 2021 month-ahead local RA compliance filing, showing a deficiency in one local area, but also showing that it has met the local RA obligation in the aggregated PG&E Other local area. PG&E submitted a request for waiver from its local procurement obligation via Advice Letter 6370-E pursuant to D.06-06-064 and D.20-06-031.

Section 3.8 of D.20-06-031 establishes criteria for fulfilling local RA obligations in the six disaggregated local areas:

*Accordingly, an LSE shall have fulfilled their RA obligations in the six disaggregated LCAs if the following requirements are met:*

- (1) The LSE makes the required demonstration as part of the current local waiver process through the Tier 2 Advice Letter for its disaggregated PG&E Other local capacity requirements; and*
- (2) The LSE, in its Year Ahead compliance filing, demonstrates procurement of local RA capacity within the PG&E Other LCAs such that the LSE's collective procurement in the six disaggregated PG&E Other LCAs meets the LSE's collective requirement for the disaggregated PG&E Other LCAs.*

*The process and standard for applying for the PG&E Other waiver will otherwise be the same process and standard for all local waiver requests. An LSE may still*

*seek a waiver of one or more of the disaggregated PG&E Other obligations, even if it has not met the aggregation obligation despite commercially reasonable efforts.*

Section 3.3.12 of D.06-06-064 approved a CPUC staff waiver process from LSE procurement obligations as a necessary “market power mitigation measure” – and describes a standard that an LSE may use to demonstrate that it could not reasonably achieve its LCR obligations:

*(1) a demonstration that the LSE reasonably and in good faith solicited bids for its RAR capacity needs along with accompanying information about the terms and conditions of the Request for Offer or other form of solicitation, and*

*(2) a demonstration that despite having actively pursued all commercially reasonable efforts to acquire the resources needed to meet the LSE’s local procurement obligation, it either*

*(a) received no bids, or*

*(b) received no bids for an unbundled RA capacity contract of under \$40 per kW-year or for a bundled capacity and energy product of under \$73 per kW-year, or*

*(c) received bids below these thresholds but such bids included what the LSE believes are unreasonable terms and/or conditions, in which case the waiver request must demonstrate why such terms and/or conditions are unreasonable.*

*An LSE’s waiver request that meets these requirements is a necessary but not a sufficient condition for the grant of such waiver. The Commission will also consider other information brought to its attention regarding the reasonableness of the waiver request.*

In D.19-06-026, the Commission updated the local trigger price from \$40/kW-year to \$51/kW-year.

Energy Division has reviewed PG&E’s December 2021 month-ahead compliance filing and determines that PG&E has met its local RA obligation in the aggregated PG&E Other local area. Energy Division also reviewed PG&E’s actions to procure local RA resources to meet the local RA requirements of the one deficient local area; Energy Division finds PG&E’s procurement efforts reasonable considering the capacity available to meet PG&E’s local RA obligation. In this case, Energy Division finds that PG&E held solicitations and pursued all commercially reasonable efforts to acquire the resources needed to meet the LSE’s local procurement obligations. PG&E’s waiver request includes confidential market-sensitive information supporting this finding.

PG&E’s waiver request demonstrated that it pursued all commercially reasonable efforts in procuring local capacity to meet its local RA obligations in the deficient local area. The Energy Division of the California Public Utilities Commission (Commission) approves Advice Letter

6370-E, PG&E's request for a waiver from its local procurement obligation and any penalties associated with this obligation.

Thus, Energy Division grants Advice Letter 6370-E, PG&E's request for a waiver of its December 2021 month-ahead local RA procurement obligation.

Advice Letter 6370-E is effective on December 22, 2021.

Sincerely,

Handwritten signature of Edward Randolph in cursive, followed by the text "(for)" in parentheses.

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy /  
Director, Energy Division

Cc: [EDComplianceReports@cpuc.ca.gov](mailto:EDComplianceReports@cpuc.ca.gov)

October 18, 2021

**Advice 6370-E**

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

**Subject: Request for Waiver of Penalties for Failure to Meet Local Resource Adequacy Procurement Obligations for December 2021****I. Purpose**

Pursuant to Decisions 06-06-064 and 19-06-026, Pacific Gas and Electric Company (PG&E) hereby submits this Advice Letter to request from the California Public Utilities Commission (Commission or CPUC) a waiver of penalties for failure to demonstrate in its December 2021 resource adequacy (RA) compliance filing (December 2021 Filing) that it has met its local RA procurement obligations in the Greater Bay Area Local Capacity Area (LCA). In accordance with Decision 06-06-064, PG&E is submitting this Advice Letter at the same time it is submitting its December 2021 Monthly Compliance Filing.

**II. Background**

In Decision 06-06-064 and Decision 07-06-029, the Commission first established local RA procurement obligations and a penalty structure applicable when a load serving entity (LSE) fails to demonstrate in its required compliance filing that it has met its allocated local RA procurement obligations.<sup>1</sup> Anticipating that, despite commercially reasonable efforts, some LSEs may ultimately be unable to procure capacity necessary to meet local obligations due to limited availability in local areas, the Commission also adopted a waiver-of-penalties process. An LSE is able to request, at the time it files its local RA compliance showing, a waiver of penalties associated with its failure to demonstrate that it has met its local RA procurement obligation, if certain conditions are met.<sup>2</sup> The Commission found that this waiver process is “necessary as a market power mitigation measure.”<sup>3</sup> If an LSE demonstrates that a waiver of penalties is justified, it will be obligated to pay for any backstop procurement, but it will not be penalized by the

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<sup>1</sup> Decision 06-06-064, pp. 66-69, Conclusions of Law 24-26, Ordering Paragraph 1; Decision 07-06-029, pp. 37-38.

<sup>2</sup> Decision 06-06-064, pp. 71-74, Conclusions of Law 27-28, Ordering Paragraph 1.

<sup>3</sup> Decision 06-06-064, p. 71.

Commission.<sup>4</sup> In Decision 19-02-022, the Commission extended this waiver of penalties process to multi-year local RA procurement obligations.<sup>5</sup>

Initially, local RA penalty waiver requests were received and processed confidentially by Commission staff.<sup>6</sup> In Decision 19-06-026, the Commission adopted local RA obligations for all LSEs for 2020-2022 and determined that the recent increase in local waiver requests necessitated establishment of a formal, transparent waiver review process.<sup>7</sup> Accordingly, the Commission adopted a requirement that local RA penalty waiver requests be submitted via Tier 2 Advice Letter with service to the service list (in redacted form, if necessary) of the RA proceeding open at the time of the request.<sup>8</sup>

### III. Waiver Request Requirements

Decision 06-06-064 sets forth the required contents of a waiver request,<sup>9</sup> and Decision 19-06-026 provides an update to such required contents.<sup>10</sup> Section 24 of the Commission's *2020 Filing Guide for System, Local and Flexible Resource Adequacy (RA) Compliance Filings*, issued October 17, 2019, includes these updated requirements, as follows:

The waiver process is as follows. An LSE requesting a waiver must make such request at the time it files its Local RAR compliance showing. The waiver request must include both of the following:

(1) a demonstration that the LSE reasonably and in good faith solicited bids for its RAR capacity needs along with accompanying information about the terms and conditions of the Request for Offer or other form of solicitation, and

(2) a demonstration that despite having actively pursued all commercially reasonable efforts to acquire the resources needed to meet the LSE's local procurement obligation, it either

(a) received no bids, or

(b) received no bids for an unbundled RA capacity contract of under \$51 per kW-year or for a bundled capacity and energy product of under \$73 per kW-year, or

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<sup>4</sup> Decision 06-06-064, p. 4.

<sup>5</sup> Decision 19-02-022, p. 29, Ordering Paragraph 13.

<sup>6</sup> Decision 19-06-026, p. 16.

<sup>7</sup> Decision 19-06-026, Ordering Paragraphs 1-3, p. 17.

<sup>8</sup> Decision 19-06-026, Ordering Paragraph 8.

<sup>9</sup> Decision 06-06-064, pp. 72-73.

<sup>10</sup> Decision 19-06-026, Ordering Paragraph 6.

(c) received bids below these thresholds but such bids included what the LSE believes are unreasonable terms and/or conditions, in which case the waiver request must demonstrate why such terms and/or conditions are unreasonable.

These requirements are necessary, but are not necessarily a sufficient, condition for CPUC to grant waiver. The Commission will also consider other information brought to its attention regarding the reasonableness of the waiver request.<sup>11</sup>

#### **IV. PG&E's Waiver Request**

Despite good faith, commercially reasonable efforts, PG&E is submitting a December 2021 Filing that fails to demonstrate that PG&E has met the entirety of its local RA obligations for the December 2021 period. Besides undertaking all the procurement efforts discussed in PG&E's 2021 Annual Compliance Filing, PG&E reasonably and in good faith issued several electronic solicitations and made all commercially reasonable efforts to meet its current local RA procurement obligations for December 2021, but it was unable to close its short positions. Thus, PG&E requests a waiver of penalties for failure to make the required demonstration regarding local RA procurement obligations in the Greater Bay Area LCA.

##### **A. PG&E reasonably and in good faith solicited bids for PG&E's local RA capacity needs for December 2021**

Below, PG&E provides a demonstration that it reasonably and in good faith solicited bids for its local RA capacity needs along with accompanying information about the terms and conditions of PG&E's requests for offers and other forms of solicitation.

##### **PG&E Solicitations for Capacity to Meet Local RA Procurement Obligations**

PG&E undertook several electronic solicitations to fulfill its Greater Bay Area local procurement obligations for the 2021 compliance year. Specifically, the first was a Q3 Balance of Year and 2021-2023 Local RA Procurement Resource Adequacy Electronic Solicitation, which sought to procure volumes in the Greater Bay Area LCA, as well as other LCAs. This solicitation was announced on April 6, 2020.

Subsequent solicitations also requested multi-year offers for PG&E to purchase the capacity needed in the Greater Bay Area LCA and other LCAs. These included the Q4 Balance of Year and 2021-2022 Local RA Procurement Resource Adequacy Electronic Solicitation (launched July 9, 2020), as well as an annual solicitation with two phases. A

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<sup>11</sup> 2021 Filing Guide for System, Local and Flexible Resource Adequacy (RA) Compliance Filings, issued October 2, 2020, p. 42.

Multi-Year Resource Adequacy Electronic Solicitation – Phase 1 was launched on August 11, 2020, for purchases and sales of Local, System, and Flexible RA, and Import Allocation Rights for the years 2021 through 2022. On September 18, 2020, PG&E started Phase 2 of the 2020 Multi-Year RA Electronic Solicitation for the same products. PG&E held solicitations on November 10, 2020, January 11, 2021, April 7, 2021, July 8, 2021, and August 30, 2021, which included requests to purchase Greater Bay Area Resource Adequacy in December, amongst other products and months. The documents associated with these solicitations can be found in Appendix A.

See the table below for a visual representation of these PG&E Electronic Solicitations.

<b>Title of Solicitation</b>	<b>Date Launched</b>	<b>Term</b>	<b>Products Sought</b>
Q3 Balance of Year + 2021-2023 Local RA Procurement Resource Adequacy Electronic Solicitation	April 6, 2020	July – December 2020	Buy, Sell, Simultaneous Buy/Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2021-2023	Buy Local RA (Greater Bay Area LCA, and well as the other LCAs)
Q4 Balance of Year + 2021-2022 Local RA Procurement Resource Adequacy Electronic Solicitation	July 9, 2020	October – December 2020	Buy, Sell, Simultaneous Buy/Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2021-2022	Buy Local RA (all LCAs)
Multi-Year Resource Adequacy Electronic Solicitation – Phase 1	August 11, 2020	2021	Buy, Sell, Simultaneous Buy/Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2022	Buy and Sell Local RA (all LCAs)
Multi-Year Resource Adequacy Electronic Solicitation – Phase 2	September 18, 2020	2021	Buy, Sell, Simultaneous Buy/Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2022	Buy and Sell Local RA (all LCAs)

February – December 2021 Resource Adequacy Electronic Solicitation	November 10, 2020	February – December 2021	Buy, Sell, Simultaneous Buy/Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
Q2 Balance of Year 2021 Resource Adequacy Electronic Solicitation	January 11, 2021	April – December 2021	Buy, Sell, Simultaneous Buy/Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
Q3 Balance of Year 2021 Resource Adequacy Electronic Solicitation	April 7, 2021	July – December 2021	Buy, Sell, Simultaneous Buy/Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
Q4 Balance of Year 2021 Resource Adequacy Electronic Solicitation	July 8, 2021	October – December 2021	Buy, Sell, Simultaneous Buy/Sell System, Local, and Flexible RA Sell Import Allocation Rights Buy Import Energy
		2022	Buy Local RA
November – December 2021 Resource Adequacy Electronic Solicitation	August 30, 2021	November – December 2021	Buy Local RA (all LCAs) Simultaneous buy/sell (PG&E buys Local and sells System)

In addition to these solicitations, PG&E has conducted numerous market outreach activities to support the CPUC's Procurement Requirements from Decision 21-03-056. Throughout all outreach over the past six months, we have not found any additional Greater Bay Area Local Capacity beyond what was provided from the solicitations above.

**B. Despite having actively pursued all commercially reasonable efforts to acquire needed resources, PG&E either received no bids, received no bids under the specified thresholds, or received bids below the applicable thresholds that included what PG&E believes are unreasonable terms and/or conditions**

Below, PG&E provides a demonstration that, despite having actively pursued all commercially reasonable efforts to acquire the resources needed to meet its local procurement obligations in the Greater Bay Area LCA for December 2021, PG&E either: (a) received no bids, (b) received no bids under the specified thresholds, or (c) received

bids below the thresholds but such bids included what PG&E believes are unreasonable terms and/or conditions.

### Results

PG&E was able to procure capacity in the Greater Bay Area LCA. However, despite commercially reasonable efforts, PG&E was unable to procure to its full local RA obligation for the Greater Bay Area LCA for December 2021.<sup>12</sup>

In the Greater Bay Area LCA, there were (a) suppliers who had no capacity to sell and therefore PG&E received no bids from those suppliers, (b) suppliers that submitted bids to PG&E with prices that exceeded the applicable \$51 per kW-year or \$73 per kW-year thresholds, or (c) suppliers that submitted bids to PG&E below the applicable \$51 per kW-year or \$73 per kW-year thresholds, but such bids included what PG&E believes are unreasonable terms and/or conditions. Detailed descriptions of PG&E's efforts to procure in the Greater Bay Area LCA, including descriptions of bids received and a demonstration of why terms and/or conditions included in some bids are unreasonable, can be found in Appendix B.

### **C. Other information**

In Decision 20-06-031, the CPUC adopted local RA requirements for the Greater Bay Area LCA for 2021 that are approximately 40% higher than the local RA requirement for the Greater Bay Area LCA adopted in 2019 for the 2020 compliance year.<sup>13</sup> The large increase was due to the California Independent System Operator Corporation's (CAISO) local capacity requirements (LCR) study, which altered the previously utilized LCR criteria to consider a T-1-1 (i.e. loss of a transformer followed by the loss of second transformer) outage at the Metcalf 500 kV substation. PG&E explained in its comments to the CAISO's Draft LCR Study that this contingency should not be considered given PG&E's layered and robust strategy for addressing the loss of high voltage transformers at the Metcalf substation and citing North American Electric Reliability Corporation standards and Federal Energy Regulatory Commission Order 693.<sup>14</sup> Though the Commission

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<sup>12</sup> PG&E's results with respect to certain other LCAs are discussed separately in Advice Letter 5989-E, submitted concurrently herewith. In Advice Letter 5989-E, PG&E makes the required demonstration as part of the current local waiver process for its disaggregated PG&E Other local capacity requirements. Such demonstration is made in support of PG&E's utilization of the alternative compliance mechanism adopted by the Commission in Decision 20-06-031. Decision 20-06-031, p. 70, Ordering Paragraph 22. Advice Letter 5989-E is not styled as a request for waiver of penalties for failure to meet local RA procurement obligations in the PG&E Other LCA because PG&E has fulfilled its local RA procurement obligations in the six disaggregated PG&E Other LCAs pursuant to Ordering Paragraph 22 of Decision 20-06-031. Thus, no penalties are warranted with respect to the PG&E Other LCAs.

<sup>13</sup> Decision 20-06-031, p 10.

<sup>14</sup> R.19-11-009, *Comments of Pacific Gas and Electric Company (U 39 E) on the Draft 2021 Local Capacity Technical Study*, dated April 17, 2020, pp. 2-5.

acknowledged that the significant increase in Greater Bay Area LCA LCR was “concerning”<sup>15</sup> and declined to adopt its results for the Greater Bay Area LCA for 2022 or 2023 RA requirements, the Commission did ultimately adopt the 2021 requirements for the Greater Bay Area LCA based off of the CAISO’s LCR study in order to “avoid creating a disconnect between setting local RA requirements for 2021 and CAISO’s 2021 backstop decisions.”<sup>16</sup> This significantly increased requirement greatly reduced the amount of excess capacity in the Greater Bay Area LCA for the 2021 compliance year, as shown in the table below.

<b>Greater Bay Area LCA Supply &amp; Requirement</b>		
<b>Year</b>	<b>Sum of December NQC<sup>17</sup> (MW)</b>	<b>Local Requirement<sup>18</sup> (MW)</b>
2020	7032.78	4550
2021	7027.49	6353

When the excess capacity in an LCA is reduced, transactional friction can become more impactful with respect to an LSE’s ability to meet its local RA requirements. While in some cases, this transactional friction can be overcome with time, the abrupt nature of the increase in the Greater Bay Area LCA LCR in June 2020 made it very challenging for PG&E to overcome this transactional friction prior to today’s date.

## **V. Confidentiality Treatment**

In support of this Advice Letter, PG&E has provided the confidential information in Appendix B. This information is being submitted in the manner directed by Decision 08-04-023, the August 22, 2006 Administrative Law Judge’s Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066, General Order 66-D, and the “Second Revised Protective Order Regarding Confidentiality of Market Sensitive Load and Resource Data and Information” (SRPO) that ALJ Wetzell issued in his March 1, 2007 ruling to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under the SRPO and applicable law, including California Public Utilities Code Section 454.5(g), or the Investor Owned Utility Matrix, Appendix 1 of Decision 06-06-066 and Appendix C of Decision 08-04-023. Separate

<sup>15</sup> Decision 20-06-031, p. 14.

<sup>16</sup> *Id.*, p. 16.

<sup>17</sup> Summed by local area, per 2020 and 2021 NQC list issued by CPUC on November 13, 2019 and October 20, 2020, respectively. 2020 NQC List can be found at <https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/c/6442462785-cpuc-final-netqualifyingcapacitylist-2020-13nov19.xls> and 2021 NQC List can be found at <https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/c/6442466541-cpuc-netqualifyingcapacitylist-2021-20oct20.xlsx>.

<sup>18</sup> 2020 Requirement was established in Decision 19-06-026, p. 7 and 2021 Requirement was established in Decision 20-06-031, p. 17.

Declarations Seeking Confidential Treatment are being submitted concurrently with this Advice Letter.

## VI. 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 November 8, 2021, which is 21 days<sup>19</sup> after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> 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

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<sup>19</sup> The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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).

#### **VII. Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, November 17, 2021 which is 30 calendar days after the date of submittal.

#### **VIII. 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 Rulemaking (R.)17-09-020 and R.19-11-009. 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/>.

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/S/

Sidney Bob Dietz II  
Director, Regulatory Relations

#### **Attachments:**

Appendix A: Market Notices for PG&E's Electronic Solicitations

Appendix B: PG&E's Procurement Efforts in Greater Bay Area LCA (Confidential)

cc: Service Lists R.19-11-009



# 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) #: 6370-E

Tier Designation: 2

Subject of AL: Request for Waiver of Penalties for Failure to Meet Local Resource Adequacy Procurement Obligations for December 2021

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.06-06-064, D.19-06-026

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

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes  No

If yes, specification of confidential information: See Confidentiality Declaration and Matrix  
 Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Scott Ranzal, SDRi@pge.com

Resolution required?  Yes  No

Requested effective date: 11/17/21

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss in AL if more space is needed.

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

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

Name: Sidney 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](mailto:PGETariffs@pge.com)

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

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

**PACIFIC GAS AND ELECTRIC COMPANY**

**DECLARATION OF SCOTT RANZAL  
SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION CONTAINED  
IN ADVICE LETTER 6370-E**

I, Scott Ranzal, declare:

1. I am the Director of Portfolio Management within Energy Policy and Procurement at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include oversight of commercial activities and interactions with market participants related to Resource Adequacy. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information provided in Advice Letter 6370-E.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-066 and Public Utilities Code §454.5(g). The attached matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my declaration in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on October 18, 2021 at San Francisco, California.

*/s/*

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Scott Ranzal  
Director, Portfolio Management  
Pacific Gas and Electric Company

**ATTACHMENT B**

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

**Advice 6370-E  
October 18, 2021**

**IDENTIFICATION OF PROCUREMENT-RELATED CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Statute or Order That Data Corresponds To</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time Data To Be Kept Confidential</b>
<b>Document:</b>			
Grey shading in Appendix B.	Section VIII) A) – Bid Information	Information includes PG&E’s confidential sales and procurement needs for Resource Adequacy (RA) products which directly informs PG&E’s RA strategies to buy and sell in the market. Any disclosure of PG&E’s sales and procurement strategies is market sensitive, and if released, this information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage.	Three years
Grey shading in Appendix B.	Public Utilities Code §454.5(g)	Confidential bid information from solicitation e.g., participating bids, counterparty names, prices and quantities offered.  Information includes PG&E’s confidential sales and procurement needs for Resource Adequacy (RA) products which directly informs PG&E’s RA strategies to buy and sell in the market. Any disclosure of PG&E’s sales and procurement strategies is market sensitive, and if released, this information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage.	Three years

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION  
ON BEHALF OF  
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Scott Ranzal, am the Director of Portfolio Management of Pacific Gas and Electric Company (“PG&E”), a California corporation. Fong Wan, the Senior Vice President for Energy Policy and Procurement of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company  
77 Beale Street, Mail Code 25A  
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.
3. Title and description of document(s): Confidential Appendix B to Advice Letter 6370-E: PG&E Procurement Efforts in the Greater Bay Area LCA.
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	
<input checked="" type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&amp;E job titles); and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	<p>Appendix B;</p> <p>Attachments 1-9</p>
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data</p> <p>(Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)</p>	
<input type="checkbox"/>	<p>Corporate financial records</p> <p>(Protected under Govt. Code §§ 6254(k), 6254.15)</p>	



PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

ADVICE LETTER 6370-E  
 ATTACHMENT TO DECLARATION  
 October 18, 2021

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
Confidential Appendix B	PG&E Procurement Efforts in The Greater Bay LCAs	Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual  (Protected under Civ. Code §§ 1798 <i>et seq.</i> ; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)	Grey shading in Appendix B, Attachments 1-9
Confidential Appendix B	PG&E Procurement Efforts in The Greater Bay Area LCAs	Third-Party information subject to non-disclosure or confidentiality agreements or obligations  (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)	Grey shading in Appendix B, Attachments 1-9

# **PACIFIC GAS AND ELECTRIC COMPANY**

## **Appendix A**

### **Market Notices for PG&E's Electronic Solicitations**

# Attachment 1

**Wecker, Alan**

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**Subject:** RE: PG&E PRG Information | PG&E 2020 Balance of Year RA and Import Energy, and 2021-2023 RA E-Solicitation

**From:** RA\_Solicitations <[RASolicitations@pge.com](mailto:RASolicitations@pge.com)>

**Sent:** Monday, April 06, 2020 4:26 PM

**To:** RA\_Solicitations <[RASolicitations@pge.com](mailto:RASolicitations@pge.com)>

**Cc:** [Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)

**Subject:** PG&E 2020 Balance of Year RA and Import Energy, and 2021-2023 RA E-Solicitation

**To Prospective Participant:**

Pacific Gas and Electric Company ("PG&E") invites your participation in its Resource Adequacy ("RA") and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
1	Local/System RA <sup>a, b</sup>	Buy, Sell, Simultaneous Buy/Sell	1 MW	July-Dec 2020	Fixed Price \$/kW-month
2	Local RA	Buy	1 MW	Jan 2021-Dec 2023	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	July-Dec 2020	Fixed Price \$/kW-month
4	Import Energy <sup>c</sup>	Buy	25 MW	Aug-Oct 2020	CAISO LMP, ICE Index, or Fixed Price \$/MWh

**Notes:**

- a) PG&E is only accepting same-month offers for sale / bids to purchase (*i.e.*, **simultaneous PG&E buys/PG&E sells**).
- b) With respect to local for 2020, PG&E is specifically interested in procuring capacity in the Kern local capacity area.
- c) PG&E prefers to transact Import Energy with prices indexed to CAISO LMP. PG&E will also consider offers with prices indexed to ICE or with fixed prices.

All responses are due **Wednesday, April 15 by 5:00pm Pacific Prevailing Time ("PPT")** at the latest. However, PG&E encourages all participants to submit offers and bids in advance of this deadline.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

## 1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s accompanying Confirmations set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

The Parties agree that the following provisions of the Master Agreement shall not be applicable to this Confirmation or Transactions hereunder: Section 22.1(c), Section 27, and the final paragraph of Section 37 (or, if transacting under the EEI Agreement, Sections 5.1(d), 5.1(e), 5.1(f), 10.2(v), 10.2(vi), 10.2(x), and 10.10). Notwithstanding anything to the contrary contained herein, with respect to Buyer: Seller acknowledges and agrees that the existence or continuation of Buyer’s Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court for the Northern District of California (Case Nos. 19-30088 (DM) and 19-30089 (DM)) is not an Event of Default with respect to Buyer under the Master Agreement and does not entitle Seller to terminate the Master Agreement or this Confirmation solely because of such existence or continuation.

## 2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox ([RASolicitations@pge.com](mailto:RASolicitations@pge.com)), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

### 3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Monday 4/6
Offers and Bids due	Wednesday 4/15 5pm PPT
PG&E notifies participants of shortlist status	Friday 4/24
Deadline for notified shortlisted participants to accept shortlist status and final volumes	Monday 4/27 12 pm PPT
Deadline for return of partially executed confirmation(s)	Tuesday 4/28 EOD
Target full execution of confirmations	Friday 5/1 EOD

### 4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox [RASolicitations@pge.com](mailto:RASolicitations@pge.com).

### 5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

# Attachment 2

## RA Solicitations

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**To:** Wecker, Alan  
**Subject:** RE: PG&E 2020 Balance of Year RA and Import Energy, and 2021-2022 RA E-Solicitation

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**From:** RA\_Solicitations <[RASolicitations@pge.com](mailto:RASolicitations@pge.com)>  
**Sent:** Thursday, July 09, 2020 4:30 PM  
**To:** RA\_Solicitations <[RASolicitations@pge.com](mailto:RASolicitations@pge.com)>  
**Cc:** [charles.janacek@pacconsulting.com](mailto:charles.janacek@pacconsulting.com)  
**Subject:** PG&E 2020 Balance of Year RA and Import Energy, and 2021-2022 RA E-Solicitation

### To Prospective Participant:

Pacific Gas and Electric Company ("PG&E") invites your participation in its Resource Adequacy ("RA") and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
1	Local/System RA <sup>a</sup>	Buy, Sell, Simultaneous Buy/Sell	1 MW	Oct-Dec 2020	Fixed Price \$/kW-month
2	Local RA	Buy	1 MW	Jan 2021-Dec 2022	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Oct-Dec 2020	Fixed Price \$/kW-month
4	Import Energy <sup>b</sup>	Buy	25 MW	Oct-Dec 2020	CAISO LMP, ICE Index, or Fixed Price \$/MWh

### Notes:

- a) PG&E is interested in simultaneous purchase/sale transactions in the same delivery month. (*i.e.*, **simultaneous PG&E buys/PG&E sells**).
- b) PG&E's preference is to transact Import Energy indexed to CAISO LMP, but will consider offers for ICE Indexed or Fixed Prices transactions too.

All responses are due **Wednesday, July 15 by 5:00pm Pacific Prevailing Time ("PPT")** at the latest. However, PG&E encourages all participants to submit offers and bids in advance of this deadline.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

### 1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s will provide RA and IAR Confirmations at a later date that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

## 2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox ([RASolicitations@pge.com](mailto:RASolicitations@pge.com)), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

## 3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Thursday 7/9
Offers and Bids due	Wednesday 7/15 5pm PPT
PG&E notifies participants of shortlist status	Wednesday 7/22
Deadline for notified shortlisted participants to accept shortlist status and final volumes	Thursday 7/23 5pm PPT
Deadline for return of partially executed confirmation(s)	Wednesday 7/29 EOD
Target full execution of confirmations	Friday 7/31 EOD

#### **4. Contact Information**

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox [RASolicitations@pge.com](mailto:RASolicitations@pge.com).

#### **5. Disclaimers**

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

# Attachment 3

## RA Solicitations

---

**To:** Wecker, Alan  
**Subject:** RE: PG&E 2020 Multi-Year RA Solicitation - Phase 1

---

**From:** RA\_Solicitations <[RASolicitations@pge.com](mailto:RASolicitations@pge.com)>  
**Sent:** Tuesday, August 11, 2020 5:41 PM  
**To:** RA\_Solicitations <[RASolicitations@pge.com](mailto:RASolicitations@pge.com)>  
**Cc:** Charles Janecek <[Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)>  
**Subject:** PG&E 2020 Multi-Year RA Solicitation - Phase 1

### To Prospective Participant:

Pacific Gas and Electric Company ("PG&E") invites your participation in its Resource Adequacy ("RA") and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
1	System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021 – Dec 2021	Fixed Price \$/kW-month
2	Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021-Dec 2022	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Jan-Dec 2021	Fixed Price \$/kW-month
4	Import Energy *	Buy	5 MW	Jan-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

*\*PG&E's preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

All responses are due **Tuesday, August 18 by 5:00pm Pacific Prevailing Time ("PPT")** at the latest. However, PG&E encourages all participants to submit offers and bids in advance of this deadline.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

### 1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement ("Confirmation").

PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

**2. Submitting Offers and Bids**

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox ([RASolicitations@pge.com](mailto:RASolicitations@pge.com)), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

**3. Schedule for Offers and Bids**

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Tuesday 8/11
Offers and Bids due	Tuesday 8/18 5pm PPT
PG&E consults with its PRG regarding its proposed shortlist.	Thursday 8/27
PG&E notifies participants of shortlist status *	Monday 8/31
Deadline for notified shortlisted participants to accept shortlist status and final volumes	Tuesday 9/1 5pm PPT
Deadline for return of partially executed confirmation(s)	Thursday 9/10 EOD
Target full execution of confirmations	Friday 9/11 EOD

*\* PG&E may delay the shortlisting date as well as all subsequent dates based on the availability of initial Net Qualifying Capacity values.*

#### **4. Contact Information**

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox [RASolicitations@pge.com](mailto:RASolicitations@pge.com).

#### **5. Disclaimers**

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

# Attachment 4

## RA Solicitations

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**To:** Wecker, Alan  
**Subject:** RE: PG&E PRG Information | PG&E 2020 Multi-Year RA Solicitation - Phase 2

---

**From:** RA\_Solicitations <[RASolicitations@pge.com](mailto:RASolicitations@pge.com)>  
**Sent:** Friday, September 18, 2020 4:46 PM  
**To:** RA\_Solicitations <[RASolicitations@pge.com](mailto:RASolicitations@pge.com)>  
**Cc:** Charles Janecek <[Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)>  
**Subject:** PG&E 2020 Multi-Year RA Solicitation - Phase 2

### To Prospective Participant:

Pacific Gas and Electric Company (“PG&E”) invites your participation in its Resource Adequacy (“RA”) and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product ID	Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
1	System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021 – Dec 2021	Fixed Price \$/kW-month
2	Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan 2021-Dec 2022	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Jan-Dec 2021	Fixed Price \$/kW-month
4	Import Energy *	Buy	5 MW	Jan-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

*\*PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

The deadline to submit a response is 5:00 pm (PPT), 2 business days after the final NQC list is published by the CAISO. PG&E reserves the right to distribute an updated solicitation timeline to participants when more information is available.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

### 1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

## 2. Submitting Offers and Bids

Participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

Please note a few PG&E changes to the Offer and Bid Form functionality. For RA, the allowable count per mutually exclusive group increases from 3 to 6, and the maximum number of groups allowed increases to 10. PG&E has also added the ability to use mutually exclusive groups for import allocation rights.

All offers included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh as part of this solicitation. PG&E will consider offers and bids final.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox ([RASolicitations@pge.com](mailto:RASolicitations@pge.com)), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

## 3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Friday 9/18
Offers and Bids due	5 pm (PPT), 2 Business Days after Final NQC list publication
PG&E consults with its PRG regarding its proposed shortlist.	+ 4 Business Days
PG&E notifies participants of shortlist status	+ 2 Business Days
Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	+ 2 Business Days

#### 4. Contact Information

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox [RASolicitations@pge.com](mailto:RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)).

#### 5. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

# Attachment 5

**From:** [RA Solicitations](#)  
**To:** [RA Solicitations](#)  
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[Dusek,Brad](mailto:Dusek,Brad); [Wall,Bryce](mailto:Wall,Bryce); [ckeys@peninsulacleanenergy.com](mailto:ckeys@peninsulacleanenergy.com); [Chris.Sinclair](mailto:Chris.Sinclair); [Chuck.Ahrlrichs](mailto:Chuck.Ahrlrichs); [Justin.Amirault](mailto:Justin.Amirault); [Dave.Faiella](mailto:Dave.Faiella); [Raafay.Ahmed@sce.com](mailto:Raafay.Ahmed@sce.com); [Justin.Pannu@calpinesolutions.com](mailto:Justin.Pannu@calpinesolutions.com); [wgmanuel@TID.ORG](mailto:wgmanuel@TID.ORG); [BZard@roseville.ca.us](mailto:BZard@roseville.ca.us); [PApolinario@SantaClaraCA.gov](mailto:PApolinario@SantaClaraCA.gov); [Tony.Zimmer@ncpa.com](mailto:Tony.Zimmer@ncpa.com); [jdrellack@viridityenergy.com](mailto:jdrellack@viridityenergy.com); [mjbauer@ORMAT.COM](mailto:mjbauer@ORMAT.COM); [Christopher.Jimenez](mailto:Christopher.Jimenez); [BMUELLER@eid.org](mailto:BMUELLER@eid.org); [afecko@pcwa.net](mailto:afecko@pcwa.net); [CMorris@tnsk.com](mailto:CMorris@tnsk.com); [wade.vandusen@shell.com](mailto:wade.vandusen@shell.com); [drichardson@wellhead.com](mailto:drichardson@wellhead.com); [Darenda@thenescogroup.com](mailto:Darenda@thenescogroup.com); [gbaldwin@mrpgenco.com](mailto:gbaldwin@mrpgenco.com); [jgreco@mrpgenco.com](mailto:jgreco@mrpgenco.com); [mkubow@mrpgenco.com](mailto:mkubow@mrpgenco.com); [jmalone@mrpgenco.com](mailto:jmalone@mrpgenco.com); [jmeatney@mrpgenco.com](mailto:jmeatney@mrpgenco.com); [Ben.L.Corbett@conocophillips.com](mailto:Ben.L.Corbett@conocophillips.com); [David.Taylor@conocophillips.com](mailto:David.Taylor@conocophillips.com); [Terri.Clynes@conocophillips.com](mailto:Terri.Clynes@conocophillips.com); [bkeefe@sovereignstorage.com](mailto:bkeefe@sovereignstorage.com); [kmonahan@camsops.com](mailto:kmonahan@camsops.com); [dbaugh@camstex.com](mailto:dbaugh@camstex.com); [tlacoste@camstex.com](mailto:tlacoste@camstex.com); [Joe.Alves@crc.com](mailto:Joe.Alves@crc.com); [deane.burk@water.ca.gov](mailto:deane.burk@water.ca.gov); [Kevin.Quick@nexteraenergy.com](mailto:Kevin.Quick@nexteraenergy.com); [Bryce.Wall@vistracorp.com](mailto:Bryce.Wall@vistracorp.com); [Shannon.Frederick@edfenergyna.com](mailto:Shannon.Frederick@edfenergyna.com); [marketdev@leap.ac](mailto:marketdev@leap.ac); [abaird@calcomenergy.com](mailto:abaird@calcomenergy.com); [james@volutus.co](mailto:james@volutus.co); [kkrasynska@forefrontpower.com](mailto:kkrasynska@forefrontpower.com); [steven.doremus@enel.com](mailto:steven.doremus@enel.com); [dquinn@joulesmart.com](mailto:dquinn@joulesmart.com); [erin.donohue@enel.com](mailto:erin.donohue@enel.com); [katherine.stockton@cpuc.ca.gov](mailto:katherine.stockton@cpuc.ca.gov); [eforbes@tesla.com](mailto:eforbes@tesla.com); [Rosec9205@gmail.com](mailto:Rosec9205@gmail.com); [ahealy@arcainc.com](mailto:ahealy@arcainc.com); [owen.smith@irco.com](mailto:owen.smith@irco.com); [ereihani@yahoo.com](mailto:ereihani@yahoo.com); [remco@leap.ac](mailto:remco@leap.ac); [equilfenbaum@tesla.com](mailto:equilfenbaum@tesla.com); [erin.donohue@enernoc.com](mailto:erin.donohue@enernoc.com); [peter.cavan@directenergy.com](mailto:peter.cavan@directenergy.com); [mfrey@thgenergy.com](mailto:mfrey@thgenergy.com); [kier@energyhub.net](mailto:kier@energyhub.net); [nikos.bountas@sunpowercorp.com](mailto:nikos.bountas@sunpowercorp.com); [aharron@harronllc.com](mailto:aharron@harronllc.com); [dpatwa@sunpower.com](mailto:dpatwa@sunpower.com); [itsarahadams@gmail.com](mailto:itsarahadams@gmail.com); [ken@eqlenergy.com](mailto:ken@eqlenergy.com); [brewerdy@msu.edu](mailto:brewerdy@msu.edu); [colin.phillips2@nrg.com](mailto:colin.phillips2@nrg.com); [janderson@sunverge.com](mailto:janderson@sunverge.com); [l.tougas@cleanenergyregresearch.com](mailto:l.tougas@cleanenergyregresearch.com); [steven.doremus@enernoc.com](mailto:steven.doremus@enernoc.com); [jacob@generatecapital.com](mailto:jacob@generatecapital.com); [kara.briggs@nrg.com](mailto:kara.briggs@nrg.com); [jac@cpowerenergymanagement.com](mailto:jac@cpowerenergymanagement.com); [mmcmonagle@forefrontpower.com](mailto:mmcmonagle@forefrontpower.com); [jdwellshlager@bpa.gov](mailto:jdwellshlager@bpa.gov); [mark.thomson@thinkcoinc.com](mailto:mark.thomson@thinkcoinc.com); [fvah@solarcity.com](mailto:fvah@solarcity.com); [brendan@calcomsolar.com](mailto:brendan@calcomsolar.com); [nicolaj.roettinger@whiteblue.com](mailto:nicolaj.roettinger@whiteblue.com); [nekagoka@gmail.com](mailto:nekagoka@gmail.com); [john.patterson@siemens.com](mailto:john.patterson@siemens.com); [josh.weiner@sepsolar.com](mailto:josh.weiner@sepsolar.com); [jz@gogriddy.com](mailto:jz@gogriddy.com); [jwestover@thgenergy.com](mailto:jwestover@thgenergy.com); [steve@emotorwerks.com](mailto:steve@emotorwerks.com); [mleone@3phasesrenewables.com](mailto:mleone@3phasesrenewables.com); [Doug.Sansom@nrg.com](mailto:Doug.Sansom@nrg.com); [diamond@energyhub.net](mailto:diamond@energyhub.net); [shobart@olivineinc.com](mailto:shobart@olivineinc.com); [joe.s@twavetech.com](mailto:joe.s@twavetech.com); [ssessions@enernoc.com](mailto:ssessions@enernoc.com); [adam.langton@bmwna.com](mailto:adam.langton@bmwna.com); 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**Subject:** PG&E RA and Import Energy E-Solicitation  
**Date:** Tuesday, November 10, 2020 6:04:00 PM  
**Attachments:** [EEI Import Allocation Rights Confirm.docx](#)  
[EEI RA Confirm.docx](#)

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**To Prospective Participant:**

Pacific Gas and Electric Company (“PG&E”) invites your participation in its Resource Adequacy (“RA”) and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

<b>Product</b>	<b>PG&amp;E is Seeking to</b>	<b>Minimum Volume</b>	<b>Delivery Period</b>	<b>Pricing</b>
System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Feb 2021 – Dec 2021	Fixed Price \$/kW-month
Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Feb 2021 –Dec 2021  PG&E will also entertain proposals to sell to PG&E for 2022	Fixed Price \$/kW-month
Import Allocation Rights (IARs)	Sell	1 MW	Feb – Dec 2021	Fixed Price \$/kW-month
Import Energy *	Buy	5 MW	Feb – Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

*\*PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

The deadline to submit a response is 5:00 pm (PPT), Tuesday, November 17, 2020.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

**1. Master Agreement and Confirmations**

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E’s provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations require participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the

California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

**2. Submitting Offers and Bids**

PG&E will circulate the Offer and Bid form to all participants later this week. Interested participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All bids and offers for RA or IARs included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh for those products as part of this solicitation. PG&E will consider RA and IAR offers and bids final. PG&E may consider refreshed pricing for Import Energy offers, especially if those offers are fixed price.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox ([RASolicitations@pge.com](mailto:RASolicitations@pge.com)), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

**3. Schedule for Offers and Bids**

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Tuesday 11/10
Offers and Bids due	5 pm (PPT) Tuesday, 11/17
PG&E consults with its PRG regarding its proposed shortlist.	Friday, 11/20
PG&E notifies participants of shortlist status	Tuesday, 11/24
Deadline for notified shortlisted participants to accept shortlist	Monday, 11/30

status and final volumes, and return partially executed confirmation(s)	
Target full execution of confirmations	Friday, 12/4

#### **4. Contact Information**

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox [RASolicitations@pge.com](mailto:RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)).

#### **5. Disclaimers**

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

# Attachment 6

**From:** [RA Solicitations](#)  
**To:** [RA Solicitations](#)  
**Cc:** [charles.janecek@paconsulting.com](mailto:charles.janecek@paconsulting.com)  
**Subject:** PG&E RA and Import Energy E-Solicitation  
**Date:** Monday, January 11, 2021 2:56:31 PM  
**Attachments:** [EEI RA Confirm.docx](#)  
[EEI Import Allocation Rights Confirm.docx](#)  
[Bid Offer Form.xlsb](#)

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## To Prospective Participant:

Pacific Gas and Electric Company (“PG&E”) invites your participation in its Resource Adequacy (“RA”) and Import Energy Electronic Solicitation.

PG&E is seeking the following proposals:

Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Apr – Dec 2021	Fixed Price \$/kW-month
Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Apr – Dec 2021  PG&E will also consider proposals to sell to PG&E for 2022	Fixed Price \$/kW-month
Import Allocation Rights (IARs)	Sell	1 MW	Apr – Dec 2021	Fixed Price \$/kW-month
Import Energy *	Buy	5 MW	Apr – Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

*\*PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for ICE Indexed or Fixed Prices transactions too.*

The deadline to submit a response is 5:00 pm (PPT), Thursday, January 14, 2021.

This email describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

## 1. Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”).

PG&E provides the attached RA and IAR Confirmations that set forth the terms and conditions to

create and define the Products to be transacted. The Confirmations requires participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator. The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Any Import Energy transaction must be compliant with CPUC decision D.20-06-028. PG&E will discuss necessary requirements with interested sellers.

## 2. Submitting Offers and Bids

Interested participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 1 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All bids and offers for RA or IARs included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh for those products as part of this solicitation. PG&E will consider RA and IARs offers and bids final. PG&E may consider refreshed pricing for Import Energy offers, especially if those offers are fixed price.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox ([RASolicitations@pge.com](mailto:RASolicitations@pge.com)), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)) by the deadline indicated in Table 1. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

## 3. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches e-solicitation	Monday, 1/11
Offers and Bids due	5 pm (PPT) Thursday, 1/14
PG&E notifies participants of shortlist status	Monday, 1/25

Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	Tuesday, 1/26
Target full execution of confirmations	Wednesday, 2/3

#### **4. Contact Information**

Questions regarding this solicitation and process should be addressed to the PGE RA Solicitations mailbox [RASolicitations@pge.com](mailto:RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)).

#### **5. Disclaimers**

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

# Attachment 7

**From:** [RA Solicitations](#)  
**To:** [RA Solicitations](#)  
**Cc:** [charles.janecek@paconsulting.com](mailto:charles.janecek@paconsulting.com)  
**Subject:** PG&E RA and Import Energy E-Solicitation  
**Date:** Wednesday, April 7, 2021 2:15:50 PM  
**Attachments:** [EEI Import Allocation Rights Confirm.docx](#)  
[EEI RA Confirm.docx](#)  
[Bid Offer Form.xlsb](#)

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## To Prospective Participant:

Pacific Gas and Electric Company (“PG&E”) invites your participation in its Resource Adequacy (“RA”) and Import Energy Electronic Solicitation (“E-Solicitation”) via this Market Notice.

PG&E is seeking the following proposals:

Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jul – Dec 2021	Fixed Price \$/kW-month
Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jul – Dec 2021 PG&E will also consider proposals to sell to PG&E for 2022	Fixed Price \$/kW-month
Import Allocation Rights (IARs)	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jul – Dec 2021	Fixed Price \$/kW-month
Import Energy *	Buy	5 MW	Jul – Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

*\*PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for Fixed Prices or ICE Indexed transactions too.*

The deadline to submit a response is 5:00 pm (PPT), Wednesday, April 14, 2021.

This Market Notice describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this Electronic Solicitation.

## 1. RA and IAR Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement (“Confirmation”). If a

successful participant does not have an executed EEI Master Agreement in place with PG&E at the time of shortlist acceptance, additional time may be required to execute an EEI Master Agreement prior to execution of any Confirmation(s).

PG&E provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations require participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator (“CAISO”). The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

## **2. Import Energy Confirmation**

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed “Undelivered Energy”. PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Seller hereby agrees that the Product is not sourced from resources internal to the CAISO Balancing Authority Area. Buyer shall have no obligation to accept any energy sourced from resources internal to the CAISO Balancing Authority Area, and any such energy shall not be considered Product.

CAISO Balancing Authority Area refers to the collection of generation, transmission, and loads within the metered boundaries of the California Independent System Operator Corporation.

## **3. Submitting Offers and Bids**

Interested participants should submit the Offer and Bid Form. If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 2 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All bids and offers for RA or IARs included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh for those products as part of this solicitation. PG&E will consider RA and IARs offers and bids final. PG&E may consider refreshed pricing for Import Energy offers, especially if those offers are fixed price.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox ([RASolicitations@pge.com](mailto:RASolicitations@pge.com)), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)) by the deadline indicated in Table 1. Telephonic, hardcopy,

or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

#### 4. Schedule for Offers and Bids

The table below provides the tentative schedule for this Electronic Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches E-solicitation	Wednesday, 4/7
Offers and Bids due	5 pm (PPT) Wednesday, 4/14
PG&E notifies participants of shortlist status	Tuesday, 4/27
Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	Wednesday, 4/28
Target full execution of confirmations	Friday, 5/7

#### 5. Contact Information

Questions regarding this Electronic Solicitation and process should be addressed to the PGE RA Solicitations mailbox [RASolicitations@pge.com](mailto:RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek ([Charles.Janecek@PACONSULTING.COM](mailto:Charles.Janecek@PACONSULTING.COM)).

#### 6. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

# Attachment 8

**From:** [RA Solicitations](#)  
**To:** [RA Solicitations](#)  
**Cc:** [PGE\\_IE@PACONSULTING.COM](mailto:PGE_IE@PACONSULTING.COM)  
**Subject:** RE: PG&E RA and Import Energy E-Solicitation  
**Date:** Thursday, July 8, 2021 5:37:39 PM  
**Attachments:** [Offer and Bid Form.xlsb](#)

---

## To Prospective Participant:

This email includes follow on information regarding PG&E's RA and Import Energy Electronic Solicitation ("E-Solicitation") launched earlier today. Attached to this email is the Offer and Bid Form for PG&E's RA and Import Energy E-Solicitation.

Again, thank you for your consideration of this E-Solicitation and please reach out if any issues arise with receiving and opening the Offer and Bid Form.

Kind regards,

PG&E

---

**From:** RA\_Solicitations <RASolicitations@pge.com>  
**Sent:** Thursday, July 8, 2021 5:32 PM  
**To:** RA\_Solicitations <RASolicitations@pge.com>  
**Cc:** PGE\_IE@PACONSULTING.COM  
**Subject:** PG&E RA and Import Energy E-Solicitation

## To Prospective Participant:

Pacific Gas and Electric Company ("PG&E") invites your participation in its Resource Adequacy ("RA") and Import Energy Electronic Solicitation ("E-Solicitation") via this Market Notice.

PG&E is seeking the following proposals:

Product	PG&E is Seeking to	Minimum Volume	Delivery Period	Pricing
System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Oct – Dec 2021	Fixed Price \$/kW-month
Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Oct – Dec 2021 PG&E will also consider proposals to sell to PG&E for 2022	Fixed Price \$/kW-month
Import Allocation Rights (IARs)	Sell	1 MW	Oct – Dec 2021	Fixed Price \$/kW-month
Import Energy *	Buy	5 MW	Oct – Dec 2021	CAISO LMP, ICE

				Index, or Fixed Price \$/MWh
--	--	--	--	---------------------------------

*\*PG&E's preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for Fixed Prices or ICE Indexed transactions too.*

The deadline to submit a response is 5:00 pm (PPT), Thursday, July 15, 2021.

This Market Notice describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this E-Solicitation.

## **1. RA and IAR Master Agreement and Confirmations**

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement ("Confirmation"). If a successful participant does not have an executed EEI Master Agreement in place with PG&E at the time of shortlist acceptance, additional time may be required to execute an EEI Master Agreement prior to execution of any Confirmation(s).

PG&E provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations require participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator ("CAISO"). The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

## **2. Import Energy Confirmation**

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Day Ahead or Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed "Undelivered Energy". PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Seller hereby agrees that the Product is not sourced from resources internal to the CAISO Balancing Authority Area. Buyer shall have no obligation to accept any energy sourced from resources internal to the CAISO Balancing Authority Area, and any such energy shall not be considered Product.

CAISO Balancing Authority Area refers to the collection of generation, transmission, and loads within the metered boundaries of the California Independent System Operator Corporation.

### 3. Submitting Offers and Bids

Interested participants should submit the Offer and Bid Form. PG&E has received some reports of firewall software blocking receipt of the Offer and Bid Form. **Therefore, the form will be delivered in a separate email following the market notice.** If you wish to participate in the solicitation and do not receive this second notice, please contact PG&E at [RASolicitations@pge.com](mailto:RASolicitations@pge.com).

If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 2 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All bids and offers for RA or IARs included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh for those products as part of this solicitation. PG&E will consider RA and IARs offers and bids final. PG&E may consider refreshed pricing for Import Energy offers, especially if those offers are fixed price.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox ([RASolicitations@pge.com](mailto:RASolicitations@pge.com)), with a copy to the Independent Evaluator Charles Janecek ([PGE\\_IE@PACONSULTING.COM](mailto:PGE_IE@PACONSULTING.COM)) by the deadline indicated in Table 1 below. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

### 4. Schedule for Offers and Bids

The table below provides the tentative schedule for this E-Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches E-solicitation	Thursday, 7/8
Offers and Bids due	5 pm (PPT) Thursday, 7/15
PG&E notifies participants of shortlist status	Monday, 8/2
Deadline for notified shortlisted participants to accept shortlist status and final volumes, and return partially executed confirmation(s)	Tuesday, 8/3
Target full execution of confirmations	Wednesday, 8/11

### 5. Contact Information

Questions regarding this Electronic Solicitation and process should be addressed to the PGE RA Solicitations mailbox [RASolicitations@pge.com](mailto:RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek ([PGE\\_IE@PACONSULTING.COM](mailto:PGE_IE@PACONSULTING.COM)).

### 6. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no

obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

# Attachment 9

**From:** [RA Solicitations](#)  
**To:** [RA Solicitations](#)  
**Subject:** PG&E Nov-Dec 21 RA Solicitation  
**Date:** Monday, August 30, 2021 3:39:18 PM  
**Attachments:** [EEI RA Confirm.docx](#)

---

## To Prospective Participant:

Pacific Gas and Electric Company (“PG&E”) invites your indicative offers to sell fixed price (\$/kW-month) Resource Adequacy (RA) capacity to PG&E in the following local areas for the months of November and December 2021.

- Bay Area
- Humboldt
- Kern
- Fresno
- North Coast/North Bay
- Sierra
- Stockton

PG&E has a preference for Bay Area capacity, but will entertain offers for all local areas listed. PG&E seeks offers to sell to PG&E, but will also entertain proposals for swaps in which PG&E will sell back equal volumes of system RA during the same delivery period.

All offers will be considered indicative. Any transactions are subject to credit, contracting, and the execution of final documents. PG&E’s strong preference is to transact under an EEI Master Agreement. PG&E has attached its preferred form of RA confirm for reference.

The deadline to submit a response is 5:00 pm (PPT), Wednesday, September 1, 2021, unless subsequently modified by PG&E. PG&E will respond to this email with any modifications to the schedule. Please submit offers by responding to this email listing the commercial details of your proposal. Please also let us know if you have any questions about this solicitation.

Thank you for your consideration.

PG&E

**PACIFIC GAS AND ELECTRIC COMPANY**

**Appendix B**

**PG&E's Procurement Efforts in Greater Bay Area  
LCA**

**Redacted**

## Appendix B: PG&E Procurement Efforts in Greater Bay Area LCA

PG&E has determined that it will be unable to meet its annual CPUC Local Resource Adequacy (RA) compliance requirements in one local area: Greater Bay Area. The following is a summary of all activities PG&E has taken to-date to close its CPUC compliance position.

### Background on Commercial Activities

On April 6, 2020, when launching its Q3 Balance of Year and 2021-2023 Local RA Procurement RA Electronic Solicitation, PG&E included a statement indicating that the Utility was interested in RA Capacity from PG&E Local Areas in 2021-2023. [REDACTED]

On July 9, 2020, when launching its Q4 Balance of Year and 2021-2022 Local RA Procurement RA Electronic Solicitation, PG&E included a statement indicating that the Utility was interested in RA Capacity from PG&E Local Areas in 2021-2022. [REDACTED]

On August 11, 2020, when launching Phase 1 of its Multi-Year RA Electronic Solicitation, PG&E included a statement indicating that the Utility had a need in five local capacity areas (LCAs): Greater Bay Area, Kern, Stockton, Sierra and North Coast North Bay. [REDACTED]

[REDACTED] Following bid submissions from Phase 1 of the solicitation, PG&E determined that there was still a need in these five local areas. PG&E reviewed the broker market to determine if there was available capacity in these five local areas; however, it was apparent through a review of the broker market that there was either limited capacity or prices were well above \$51 per kW-year. Given this, PG&E decided to complete additional research to determine who might have capacity to close its short positions as described in the subsequent paragraph.

PG&E assessed all resources that have capacity in the LCAs where PG&E had a need. Similar to PG&E's 2019 waiver filing,<sup>1</sup> PG&E reviewed numerous sources to understand existing contractual relationships between generators and Municipal Owned Utilities and/or other LSEs with respect to resources in these LCAs. Comparing this information to the information PG&E currently has about its own portfolio, as well as the total physical capacity in the LCAs, PG&E was able to ascertain which counterparties were likely to have capacity available to sell. PG&E used this information to contact those potential suppliers and request that they participate in Phase 2 of PG&E's Multi-Year RA Solicitation.

Subsequent to the Annual RA Compliance Filing, PG&E launched five solicitations that included requests to purchase Greater Bay Area RA for December 2021, as described in the narrative of this Advice Letter.

Below, PG&E summarizes communications and attaches supporting documentation related to the Greater Bay Area LCA. PG&E provides pertinent information on PG&E's receipt of the following:

- No bids
- No bids under the applicable thresholds; and

---

<sup>1</sup> AL 5677-E

- Bids for an unbundled RA capacity contract of under \$51 per kW-year (CPUC's Local RA waiver trigger price) or for a bundled capacity and energy product of under \$73 per kW-year, but such bids included what PG&E believes are unreasonable terms and/or conditions.

**Greater Bay Area**

a. No bids

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

b. No bids under the applicable thresholds

- [Redacted]

- c. Bids below the applicable thresholds, but such bids included what PG&E believes are unreasonable terms and/or conditions

- [REDACTED]

# Attachment 1

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: PG&E PRG Information | RA and Import Energy E-Solicitation – Shortlist Update  
**Date:** Wednesday, December 2, 2020 9:51:15 AM  
**Attachments:** [Updated Shortlist - Confidential.xlsx](#)  
[Confidentiality Declaration RA IE ESol Feb-Dec2021 Shrtlst Upd.docx](#)  
[Confidentiality Matrix RA IE ESol Feb-Dec2021 Shrtlst Upd.docx](#)

---

FYI, unencrypted version for your records.

---

**From:** PGE PRG Mailbox [REDACTED]  
**Sent:** Wednesday, December 02, 2020 9:49 AM

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** PG&E PRG Information | RA and Import Energy E-Solicitation – Shortlist Update

**Confidential Protected Material**  
**Not for Public Disclosure**  
**\*\* Do Not Forward \*\***

Procurement Review Group:

PG&E has had to revise its shortlist in its ongoing RA solicitation after issues were identified while reviewing the annual RA filing to establish which specific resources were available for sale. As a result PG&E was not able to sel [REDACTED] in [REDACTED]. The attached shortlist has been updated to reflect that. There are no changes other than the removal of the [REDACTED] in those months. PG&E plans to notify shortlisted counterparties after 5:00 pm today. We welcome any questions or feedback on this updated shortlist.

If you have any questions please contact [REDACTED]  
or [REDACTED]



# Attachment 2

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: PG&E PRG Information | RA and Import Energy E-Solicitation Shortlist  
**Date:** Thursday, January 21, 2021 3:30:36 PM  
**Attachments:** [Confidentiality Matrix RA IE ESol Apr-Dec2021 Shrtlst.docx](#)  
[Confidentiality Declaration RA IE ESol Apr-Dec2021 Shrtlst.docx](#)  
[RA IE ESol Draft Shortlist Confidential.xlsx](#)

---

FYI – unencrypted version for your records.

[REDACTED]

---

**From:** PGE PRG Mailbox [REDACTED]  
**Sent:** Thursday, January 21, 2021 3:06 PM  
**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** PG&E PRG Information | RA and Import Energy E-Solicitation Shortlist

**Confidential Protected Material**  
**Not for Public Disclosure**  
**\*\* Do Not Forward \*\***

Procurement Review Group:

PG&E has completed its evaluation of conforming bids and offers received in its ongoing RA solicitation. Attached is PG&E's draft shortlist.

In addition to [REDACTED]'s non-conforming import energy offer identified in PG&E's communication to the PRG on Tuesday, January 19<sup>th</sup>, PG&E identified [REDACTED]

[REDACTED]  
These [REDACTED] – all of which represent [REDACTED] proposals.  
[REDACTED] are described in the attachment, and [REDACTED]  
[REDACTED]

We welcome any feedback or comments on this proposed shortlist. PG&E intends to communicate these proposed awards to counterparties on Monday, January 25<sup>th</sup>.

If you have any questions please contact [REDACTED] or [REDACTED]  
[REDACTED]).  
[REDACTED]

# Attachment 3

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, September 2, 2020 1:05 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED] RA\_Solicitations; charles.janecek@paconsulting.com; [REDACTED]  
**Subject:** RE: RE: PG&E | Important information regarding your Bid | -- [REDACTED]

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

Hi,

Thank you for the follow-up. No, we are not interested in moving forward with the volume we were shortlisted for.

Also, we do not have any local area excess to sell.

Thanks,

---

**From:** [REDACTED]@pge.com>  
**Sent:** Wednesday, September 2, 2020 10:57 AM  
**To:** [REDACTED]@pge.com>; [REDACTED]  
**Cc:** [REDACTED] RA\_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com; [REDACTED]@pge.com>  
**Subject:** [EXTERNAL] RE: PG&E | Important information regarding your Bid | -- [REDACTED]

**CAUTION:** This email originated from outside of [REDACTED] Do not click links or open attachments unless you recognize the sender and know the content is safe.

[REDACTED]

Acceptance of shortlisted volumes in PG&E's Multiyear Solicitation was due yesterday by 5pm PPT. This email confirms that PG&E did not receive a response from [REDACTED]

Separately, I want to let you know that PG&E is seeking additional capacity offers in Bay Area, Kern, North Coast / North Bay, Sierra, and/or Stockton Local Capacity Areas for years [REDACTED]. If [REDACTED] is interesting in exploring options to sell PG&E capacity in the above Local Capacity Areas, please respond to this email. If there is any additional information you need from PG&E, please let me know.

Thanks,

[REDACTED]

Pacific Gas & Electric Company

[REDACTED]

---

From: [REDACTED]@pge.com>

Sent: Monday, August 31, 2020 7:36 PM

To: [REDACTED]

Cc: [REDACTED] RA Solicitations <RASolicitations@pge.com>; [charles.janecek@paconsulting.com](mailto:charles.janecek@paconsulting.com); Wolf, Maya  
[REDACTED]@pge.com>; [REDACTED]@pge.com>

Subject: PG&E | Important information regarding your Bid | [REDACTED]

Dear [REDACTED]

Please see the attached PDF document and corresponding Excel and Word files for information regarding your bid.

Thank you,  
PG&E Bid Team

# Attachment 4

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, September 3, 2020 4:58 PM  
**To:** [REDACTED]  
**Cc:** RA\_Solicitations; charles.janecek@paconsulting.com  
**Subject:** Re: PG&E | Important information regarding your Bid | [REDACTED]

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

This is the only length we have in local RA.

Get [Outlook for Android](#)

---

**From:** [REDACTED]@pge.com>  
**Sent:** Thursday, September 3, 2020 4:53:56 PM  
**To:** [REDACTED]  
**Cc:** RA\_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com <charles.janecek@paconsulting.com>  
**Subject:** RE: PG&E | Important information regarding your Bid | [REDACTED]

[REDACTED]

We do not have a need for [REDACTED] at this point. Do you have any other proposals we could review?

Thanks,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, September 2, 2020 10:52 AM  
**To:** [REDACTED]@pge.com>; [REDACTED]@pge.com>; [REDACTED]  
**Cc:** RA\_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com  
**Subject:** RE: PG&E | Important information regarding your Bid | [REDACTED]

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

[REDACTED], if PG&E is open to [REDACTED] then [REDACTED] has excess [REDACTED] and open to [REDACTED] for any PG&E [REDACTED]



Cheers,

█

---

From: █@pge.com>

Sent: Wednesday, September 2, 2020 10:42 AM

To: █@pge.com>; █

█

Cc: RA\_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com

Subject: RE: PG&E | Important information regarding your Bid | █

Hello,

While PG&E has already responded to bids associated with the █ PG&E is seeking additional capacity offers in Bay Area, Kern, North Coast / North Bay, Sierra, and/or Stockton Local Capacity Areas for years █ If your company is interesting in exploring options to sell PG&E capacity in the above Local Capacity Areas, please respond to this email. If there is any additional information you need from PG&E, feel free to reach out.

Kind regards,

PG&E

█

*This correspondence is for discussion purposes only. It is not an offer to buy or sell. Any agreements between the parties are subject to PG&E senior management approval and the prior execution of definitive documents.*

---

From: █

Sent: Monday, August 31, 2020 8:30 PM

To: █@pge.com>; █

Cc: RA\_Solicitations <RASolicitations@pge.com>; charles.janecek@paconsulting.com; █@pge.com>

Subject: RE: PG&E | Important information regarding your Bid | █

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

Please find attached █ final volume award notification.

Cheers,

█

---

From: █@pge.com>

Sent: Monday, August 31, 2020 7:36 PM

To: █

Cc: █ RA\_Solicitations <RASolicitations@pge.com>;

charles.janecek@paconsulting.com; █@pge.com>; █

Subject: PG&E | Important information regarding your Bid | █

Dear █

Please see the attached PDF document and corresponding Excel and Word files for information regarding your bid.

Thank you,  
PG&E Bid Team

---

[Redacted signature]

---

---

[Redacted signature]

---

---

[Redacted signature]

---

# Attachment 5

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: (External):RE: (External):RE: Bay Area RA Swap | Nov/Dec 2021  
Date: Thursday, September 9, 2021 2:08:24 PM  
Attachments: [lmap001.jpg](#)

\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\*

Hi [REDACTED], we offered everything we have on Bay Area. There may be some from other PG&E local areas if interested.

---

From: [REDACTED]@pge.com>  
Sent: Thursday, September 9, 2021 2:04 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: (External):RE: (External):RE: Bay Area RA Swap | Nov/Dec 2021

Hi [REDACTED]

Our team received [REDACTED]'s solicitation email on [REDACTED], and noticed that it covers the Dec 2021 delivery period. Do you have more Bay Area [REDACTED]? If so, I want to let you know we are interested.

Best,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, September 9, 2021 7:54 AM  
To: [REDACTED]  
Cc: [REDACTED]@pge.com>  
Subject: RE: (External):RE: (External):RE: Bay Area RA Swap | Nov/Dec 2021

Hi [REDACTED]

Thank you for trying. I am the signer, full name and title below in my signature.

Best,

[REDACTED]  
Pacific Gas and Electric Company  
[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, September 9, 2021 7:46 AM  
To: [REDACTED]@pge.com>  
Cc: [REDACTED]@pge.com>  
Subject: RE: (External):RE: (External):RE: Bay Area RA Swap | Nov/Dec 2021

\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\*

Hi [REDACTED], let me have the signer and title and I will put this through the system. It may be a tight to complete by tomorrow but will do my best. Sincerely, [REDACTED]

---

From: [REDACTED]>  
Sent: Thursday, September 9, 2021 6:45 AM  
To: [REDACTED]  
Cc: [REDACTED]@pge.com>  
Subject: (External):RE: (External):RE: Bay Area RA Swap | Nov/Dec 2021

\*\*\* EXTERNAL EMAIL - Use caution when opening links or attachments \*\*\*

Hello [REDACTED],

Following up on this email to see if there are any remaining items to address before execution? It would be ideal for our positions team if we could execute this week. Please let us know if you have different expectations for timing.

Best,

[REDACTED]

---

From: [REDACTED]  
Sent: Tuesday, September 7, 2021 11:55 AM  
To: [REDACTED]  
Cc: [REDACTED]@pge.com>  
Subject: RE: (External):RE: Bay Area RA Swap | Nov/Dec 2021

Hi [REDACTED]

Hope you had a great holiday weekend. Here are the lognumbers for the transactions.

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Aside from the lognumbers, and the edit I suggested below, we have completed the internal review.

Best,

[REDACTED]

---

From: [REDACTED]

Sent: Thursday, September 2, 2021 1:36 PM

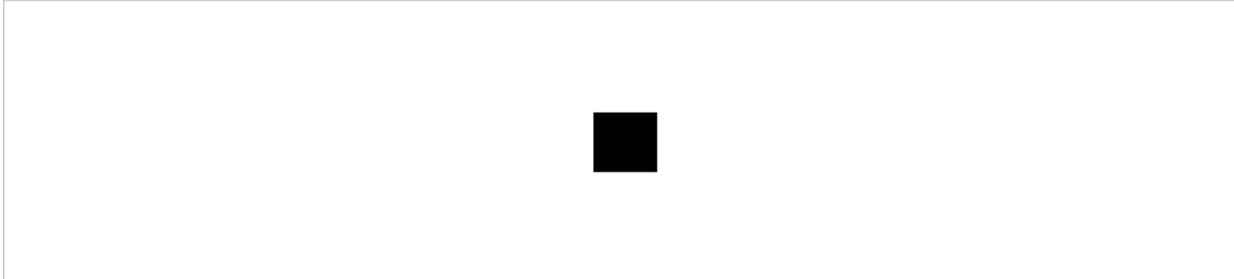
To: [REDACTED]  
Cc: [REDACTED]@pge.com>  
Subject: RE: (External):RE: Bay Area RA Swap | Nov/Dec 2021

Hi [REDACTED],

Thank you for the quick turnaround. Only one comment so far: We need to edit both confirms to change the [REDACTED]. Other than that I need to complete our internal review, and provide you with a lognumber for each transaction before we move to DocuSign. I can also confirm that I am the signatory for both of these transactions.

Best,

[REDACTED]



From: [REDACTED]  
Sent: Wednesday, September 1, 2021 1:56 PM  
To: [REDACTED]  
Cc: [REDACTED]@pge.com>  
Subject: RE: (External):RE: Bay Area RA Swap | Nov/Dec 2021

\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\*  
Hi [REDACTED], let me know if the attached are good to go and I can set them up through DocuSign. Regards, [REDACTED]

From: [REDACTED]  
Sent: Wednesday, September 1, 2021 1:32 PM  
To: [REDACTED]  
Cc: [REDACTED]@pge.com>  
Subject: (External):RE: Bay Area RA Swap | Nov/Dec 2021

\*\*\* EXTERNAL EMAIL - Use caution when opening links or attachments \*\*\*

Hello [REDACTED],

Hope all is well. Below are the system resources to move forward with the swap. I will be working with [REDACTED] from here forward to complete this transaction.

Please let us know if you have any questions.

[REDACTED]

Nov-21		
Required: [REDACTED]		
Resource ID	MW	Flex MW
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Dec-21		
Required: [REDACTED]		
Resource ID	MW	Flex MW
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

From: [REDACTED]  
Sent: Friday, August 27, 2021 12:04 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Bay Area RA Swap | Nov/Dec 2021

\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\*

[REDACTED], our planning has confirmed the following availability:

November 2021 - [REDACTED]  
December 2021 - [REDACTED]

Let us know if you want to proceed with these volumes and provide the swapped resources and quantities.

Regards, [REDACTED]

---

**From:** [REDACTED] <[REDACTED]@pge.com>

**Sent:** Thursday, August 26, 2021 6:59 PM

**To:** [REDACTED] <[REDACTED]@pge.com>

**Cc:** [REDACTED]

**Subject:** Re: (External):RE: (External):RE: October 2021 - Bay Area RA Swap

[REDACTED]

We now have a need for Bay Area in Nov-Dec how much capacity do you have available during these months? We are likely to need everything you have We would propose [REDACTED] spread

Thanks,

[REDACTED]

---

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

---

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

---

# Attachment 6

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Local Dec RA  
**Date:** Wednesday, October 13, 2021 1:35:25 PM

---

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

Hi [REDACTED]

Apologies for not getting back to you sooner. All I've got so far is system w/ flex for December available, no local unfortunately.

Will keep looking, however.

Thanks,

[REDACTED]

---

**From:** [REDACTED]@pge.com>  
**Sent:** Thursday, October 7, 2021 10:29 AM  
**To:** [REDACTED]  
**Subject:** RE: Local Dec RA

Good Morning [REDACTED]

Just wanted to check in again if there's been any activity in the market. I understand December local supply has been hard to find so appreciate you asking around for us.

Thanks,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, October 4, 2021 12:55 PM  
**To:** [REDACTED]  
**Subject:** RE: Local Dec RA

Thanks [REDACTED] We can show a bid for [REDACTED] for now. We are open to swaps as well and can specify the spread if there is interest.

---

**From:** [REDACTED]  
**Sent:** Monday, October 4, 2021 12:08 PM  
**To:** [REDACTED]@pge.com>  
**Subject:** RE: Local Dec RA

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

Hi [REDACTED]

Appreciate the update. Nothing has shaken loose but I continue to check in with everyone on this, I'm surprised the local supply is so tight for Dec..

Thanks,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@pge.com>  
**Sent:** Monday, October 4, 2021 1:06 PM  
**To:** [REDACTED]  
**Subject:** RE: Local Dec RA

Hey [REDACTED]

Hope you had a great weekend. We won't know about our [REDACTED] availability until after phase 2 of our annual solicitation, which should wrap up by the end of the month. We can revisit then if there is still a need!

Any updates on local Dec '21?

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, September 29, 2021 10:48 AM  
**To:** [REDACTED] <[REDACTED]@pge.com>  
**Subject:** RE: Local Dec RA

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

Hey, [REDACTED]

Hope you're doing well, as well. Got it, I have you on the bid and will let you know if anything shakes loose for local Dec '21.

Please let me know if you have [REDACTED] that seems to be the hot item right now!

Thanks,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@pge.com>



# Attachment 7

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Local December RA  
**Date:** Monday, October 4, 2021 1:01:34 PM

---

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

Hey [REDACTED]

Thanks for following up. So far, unfortunately I've found either nothing or another buyer looking for dec21 PGEO. I think we should up our bid to be a little more aggressive, perhaps maybe [REDACTED] range?

I have a couple that said maybe they have some scraps but so far they have not come back with anything.

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]@pge.com>  
**Sent:** Monday, October 4, 2021 3:58 PM  
**To:** [REDACTED]  
**Subject:** [External email] RE: Local December RA

**Warning.** This email is from outside of the organisation. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

---

Hi [REDACTED]

[REDACTED] Any updates on local December RA from the market?

Thanks,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, September 28, 2021 1:27 PM

To: [REDACTED]@pge.com>

Subject: RE: Local December RA

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

Okay ty sounds good. And last question – generic would be okay for this, do not require flex?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

From: [REDACTED]@pge.com>

Sent: Tuesday, September 28, 2021 4:26 PM

To: [REDACTED]

Subject: [External email] RE: Local December RA

**Warning.** This email is from outside of the organisation. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

---

Yes PG&E region local! And any volumes will help so partial fills will work I believe. We're ok with showing [REDACTED] to start.

---

From: [REDACTED]

Sent: Tuesday, September 28, 2021 1:11 PM

To: [REDACTED]@pge.com>

Subject: RE: Local December RA

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

To be clear, any local in the PG&E region right?

And would partial fills work, or at this point just assessing availability? If partial fills are okay, would [REDACTED] be okay to show on the bid side and start working?

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

---

**From:** [Redacted] <[Redacted]@pge.com>  
**Sent:** Tuesday, September 28, 2021 4:09 PM  
**To:** [Redacted]  
**Subject:** [External email] RE: Local December RA

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---

Great, thanks! For now we're looking to get [Redacted] MW of any local.

---

**From:** [Redacted]  
**Sent:** Tuesday, September 28, 2021 12:58 PM  
**To:** [Redacted] <[Redacted]@pge.com>  
**Subject:** RE: Local December RA

**\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\***

NP, happy to help.

In dec21, we've had a bunch of system sellers. I'd guess that some could be unloading a local length at best value they can get, so perhaps I can source some together. Which would be looking for and how much volume of each? I'd suggest starting [Redacted] bid for anything we need.

Thanks,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

---

**From:** [Redacted] <[Redacted]@pge.com>

**Sent:** Tuesday, September 28, 2021 3:51 PM

**To:** [REDACTED]

**Subject:** [External email] Local December RA

**Warning.** This email is from outside of the organisation. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

---

Hey [REDACTED]

Thanks for your help in pulling the [REDACTED] volumes. We still have some 2021 RA needs - looking for any local RA for December 2021. Can you let us know if you see anything in the market?

Thanks,

[REDACTED]

-

[REDACTED]

[REDACTED]

Pacific Gas and Electric Company

[REDACTED]

# Attachment 8

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: PG&E PRG Information | RA and Import Energy E-Solicitation – Draft Shortlist  
**Date:** Wednesday, July 28, 2021 1:19:30 PM  
**Attachments:** [Confidentiality Declaration RA IE ESol Oct-Dec2021 Draft Shortlist.docx](#)  
[Confidentiality Matrix RA IESsol Oct-Dec2021 Draft Shortlist.docx](#)  
[Draft Shortlist RA IE ESol Oct-Dec2021.xlsx](#)

---

FYI – unencrypted version for your records

---

**From:** PGE PRG Mailbox [REDACTED]  
**Sent:** Wednesday, July 28, 2021 1:15 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** PG&E PRG Information | RA and Import Energy E-Solicitation – Draft Shortlist

**Confidential Protected Material**  
**Not for Public Disclosure**  
**\*\* Do Not Forward \*\***

Procurement Review Group:

PG&E has completed its evaluation of conforming bids and offers received in its ongoing RA e-solicitation. Attached is PG&E's draft shortlist.

We welcome any feedback or comments on this proposed shortlist. PG&E intends to communicate these proposed awards to counterparties on Monday, August 2<sup>nd</sup>.

If you have any questions, please contact [REDACTED] or [REDACTED].  
[REDACTED]

[REDACTED]

# Attachment 9

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: PG&E PRG Information | RA and Import Energy E-Solicitation – Draft Shortlist  
**Date:** Friday, April 23, 2021 2:43:47 PM  
**Attachments:** [Draft Shortlist RA IE ESol Jul-Dec2021.xlsx](#)  
[Confidentiality Matrix RA IESsol Jul-Dec2021 Draft Shortlist.docx](#)  
[Confidentiality Declaration RA IE ESol Jul-Dec2021 Draft Shortlist.docx](#)

---

FYI – unencrypted version for your records.

---

**From:** PGE PRG Mailbox [REDACTED]  
**Sent:** Friday, April 23, 2021 2:13 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** PG&E PRG Information | RA and Import Energy E-Solicitation – Draft Shortlist

**Confidential Protected Material**  
**Not for Public Disclosure**  
**\*\* Do Not Forward \*\***

Procurement Review Group:

PG&E has completed its evaluation of conforming bids and offers received in its ongoing RA e-solicitation. Attached is PG&E's draft shortlist.

We welcome any feedback or comments on this proposed shortlist. PG&E intends to communicate these proposed awards to counterparties on Tuesday, April 27<sup>th</sup>.

If you have any questions please contact [REDACTED] or [REDACTED]  
[REDACTED]

[REDACTED]

**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

Intertie

Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Semptra 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