

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



June 8, 2022

Advice Letter 6387-E and 6387-E-A

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: Procurement Transaction Quarterly Compliance Submittal (Q3, 2021)

Dear Mr. Jacobson:

Advice Letters 6387-E and 6387-E-A are effective as of December 1, 2021.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Skala".

Pete Skala
Interim Deputy Executive Director for Energy and Climate Policy/
Interim Director, Energy Division, CPUC

April 13, 2022

Advice 6387-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q3, 2021)

Purpose

Pacific Gas and Electric Company (“PG&E”) is submitting this supplemental advice letter to the California Public Utilities Commission (“Commission” or “CPUC”) related to its Procurement Transaction Quarterly Compliance Report (“QCR”) for record period July 1, 2021 to September 30, 2021, (Q3 2021) to correct the Non-Investment Grade Counterparty document in Confidential Attachment B. In addition, PG&E is supplementing the material with its final Independent Evaluator (“IE”) Report in Public and Confidential Attachment G. Lastly, PG&E is providing an RPC Paper that was inadvertently omitted in Confidential Attachment K.

Background**Advice Letter 6387-E**

PG&E submitted its QCR for Q3 2021 on November 1, 2021 in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports to be submitted within 30 days¹ of the end of the quarter.

Advice Letter 6387-E-A

In response to the Utility Audit Branch staff Q3 2021 QCR Audit Report, PG&E is submitting this Supplemental Advice Letter to correct the Non-Investment Grade Counterparty document in Confidential Attachment B.

The Multi-Year Local RA Solicitation (Phases I and II) spanned two quarters and was still ongoing at the time of the Q3 2020 QCR Filing. The Independent Evaluator (IE) Report

¹ The 30-day timeframe concluded on a weekend, therefore, PG&E moved the date to the following business day.

for this Solicitation could not be finalized before the Q3 2021 QCR Filing date. In lieu of the IE Report, PG&E included a Project Status Memo with its Q3 2021 QCR Filing stating that PG&E would submit the final IE Report in a Q3 2021 QCR Supplemental Advice Letter Filing.

PG&E inadvertently omitted a RPC paper in Confidential Attachment K regarding a Q3 transaction that was approved via Advice Letter 6289-E.

Attachment 1: Confidential Attachment B - CLEAN
Revised Non-Investment Grade Counterparties

Attachment 2: Confidential Attachment B - REDLINE
Revised Non-Investment Grade Counterparties

Attachment 3: Public Attachment G
Final Phase I and II Multi-Year RA Solicitation IE Report

Attachment 4: Confidential Attachment G
Final Phase I and II Multi-Year RA Solicitation IE Report

Attachment 5: Confidential Attachment K
RPC Paper

Protests

PG&E asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 6387-E and not reopen the protest period.

Effective Date

Pursuant to General Order 96-B, Energy Industry Rule 5.1, this Tier 2 advice letter will become effective concurrent with original Advice Letter 6387-E, which is December 1, 2021. Advice Letter 6387-E was suspended for a period of up to 300 days, therefore there is no need to extend the effective date. The effective date of Advice Letter 6387-E-A remains suspended until disposition by Energy Division.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the service list for Rulemaking ("R.") 16-02-007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at



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 U39 E)

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) #: 6387-E-A

Tier Designation: 2

Subject of AL: Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q3, 2021)

Keywords (choose from CPUC listing): Compliance, Procurement

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.03-12-062 and D.02-10-062

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

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

Confidential treatment requested? Yes No

If yes, specification of confidential information: See Confidentiality Declarations and Matrix
 Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Marianne Aikawa, marianne.aikawa@pge.com

Resolution required? Yes No

Requested effective date: 12/1/21

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

Advice 6387-E-A
April 13, 2022

Attachment 1

Revised Confidential Attachment B-CLEAN

Revised Non-Investment Grade Counterparties

Advice 6387-E-A
April 13, 2022

Attachment 2

Revised Confidential Attachment B-REDLINE

Revised Non-Investment Grade Counterparties

Advice 6387-E-A
April 13, 2022

Attachment 3

Public Attachment G

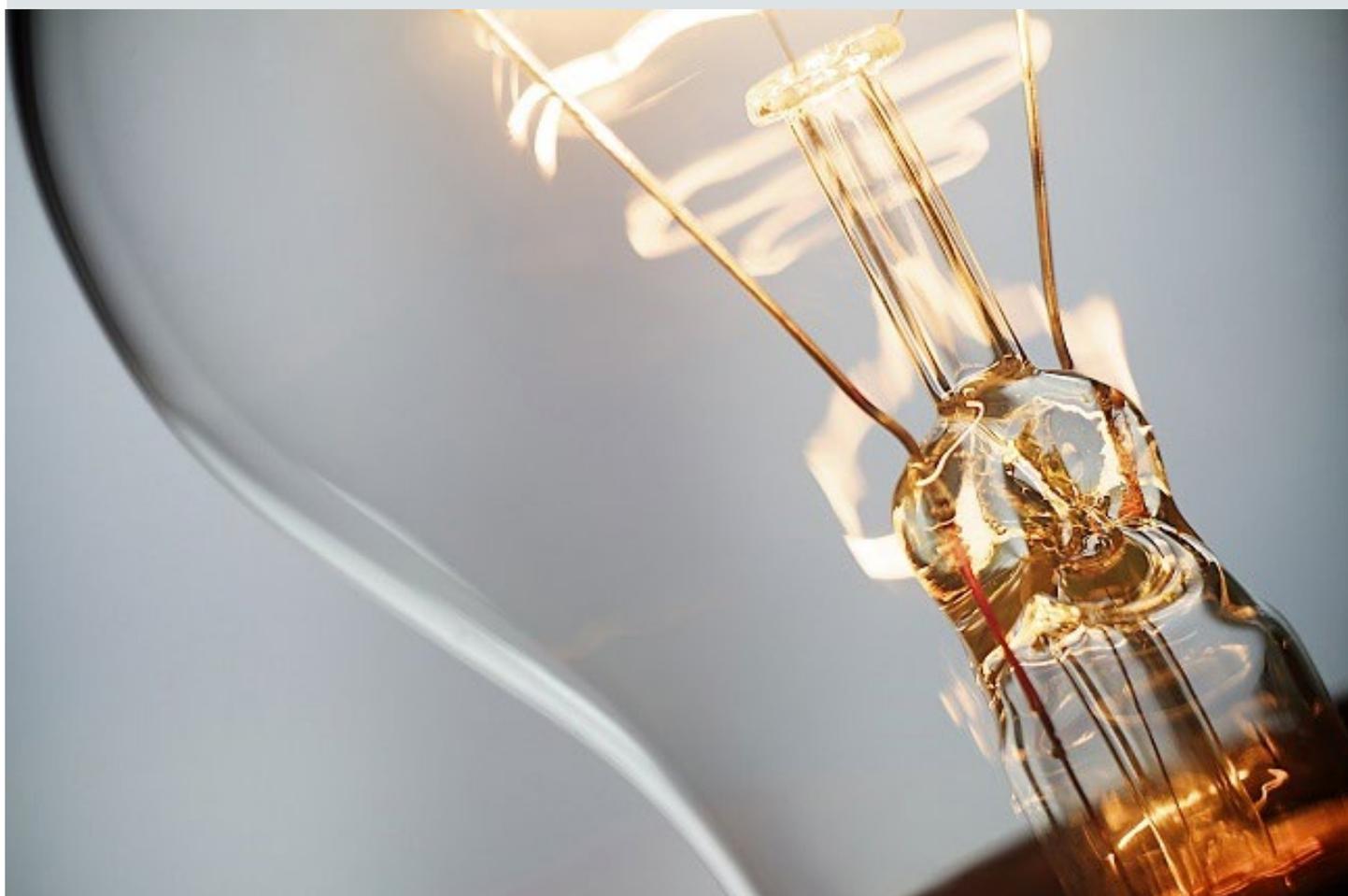
Final Phase I and II Multi-Year RA Solicitation IE Report



PACIFIC GAS & ELECTRIC

Independent Evaluator Report for the 2022
Annual Resource Adequacy and Import
Energy Electronic Solicitation

January 2022



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Version no: 1.0

Document reference: PGE 1950Task13

EXECUTIVE SUMMARY

PA Consulting Group, Inc. (PA) served as the Independent Evaluator (IE) for the Pacific Gas & Electric (PG&E) 2022 Annual Resource Adequacy (RA) and Import Energy Electronic Solicitation (E-Solicitation) (2022 Annual RA Solicitation or the Solicitation). This report provides PA's evaluation of the process from the drafting of the E-Solicitation documents through to the recommendation of selected bids and negotiation of contracts.

Overview of Solicitation

PG&E conducted the 2022 Annual RA Solicitation in two phases. Phase I was intended to address market needs after the release of the initial 2022 Year-Ahead RA allocations and Net Qualifying Capacity (NQC) lists; Phase II was intended to finalize procurement upon release of the final NQC list.

In developing PG&E's RA positions prior to the E-Solicitation, it was identified that for 2022, PG&E is [REDACTED] on a System basis [REDACTED]. Additionally, PG&E is short on RA for certain Local areas, primarily [REDACTED]

PG&E did not specify the amounts of RA capacity it wished to sell. Phase I activities concluded in September 2021, with PG&E executing transactions with [REDACTED]

Phase II of the E-Solicitation was launched on September 23, 2021 with offers and bids originally due September 30, 2021. However, because of the uncertainty related to exactly when the California Independent System Operator (CAISO) would release its final NQC list, the E-Solicitation specified that if the CAISO had not released the final NQC list by September 27, 2021, that PG&E retained the right to delay the deadline(s) on a day-by-day basis. The CAISO released the final NQC list on October 1, 2021, and ultimately bids and offers were due on October 5, 2021.

Phase II activities concluded in October 2021, with PG&E executing transactions with [REDACTED]



PA's IE Report

PA's IE report generally follows the California Public Utilities Commission's (Commission or CPUC) Solicitation Shortlist Report Templates. The main sections include:

- Section 1: Summary of the 2022 Annual RA Solicitation
- Section 2: Summary of PA's role as IE for the E-Solicitation
- Section 3: PG&E's outreach efforts
- Section 4: PG&E's methodology design
- Section 5: Fairness of the application of PG&E's Bid Evaluation Criteria
- Section 6: Merit of E-Solicitation shortlists
- Section 7: Fairness of negotiations
- Section 8: PA support for contract approval

Main IE activities during solicitation

PA's role in PG&E's E-Solicitation spanned approximately five months from August through December 2021. The following provides a summary of PA's main activities during this E-Solicitation:

- PA reviewed drafts of the E-Solicitation documents prior to PG&E issuing the E-Solicitation.
- PA received all communications between PG&E and bidders. PA directly received all the emails, including bid packages that were sent to and received from bidders as well as non-conforming offers participants made to PG&E.
- PA and PG&E conducted several IE calls during which PG&E advised PA of the status of the E-Solicitation and discussed the treatment of certain bids.
- PA reviewed all Phase I and Phase II bids.
- PA reviewed and confirmed PG&E's shortlisted bids by reconciling a sample of bids in Phase I and fully reconciling all bids in Phase II. PA completed this review and confirmation of PG&E's shortlisted bids prior to the shortlist notifications for both Phase I and Phase II.
- PA reviewed PG&E's contract negotiations via redlined documents with selected bidders to ensure that the negotiation process was fair and all bidders were treated consistently.
- PA reviewed and continues to monitor the EEI negotiation process with a shortlisted counterparty.

High level summary of findings

Overall, PA confirms that PG&E conducted a fair and equitable E-Solicitation.

Some specific findings are noted below:

- PG&E in no way prevented PA from observing its process and analyzing its methods and did not interfere with PA's conducting the Independent Evaluation.
- PA finds that PG&E's outreach for the E-Solicitation was adequate, the E-Solicitation materials were clear and concise, and that PG&E further clarified its position in several follow-up bidder questions throughout the E-Solicitation.
- During both Phases of the E-Solicitation, [REDACTED]
- Based on our review of PG&E's analysis, our participation in calls and meetings and other IE activities, PA finds that PG&E conducted the 2022 Annual RA Solicitation evaluation analysis fairly and selected appropriate offers.

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1 SUMMARY OF THE 2022 ANNUAL RESOURCE ADEQUACY SOLICITATION

In this E-Solicitation, PG&E sought offers for sale (i.e., **PG&E buys**), bids to purchase (i.e., **PG&E sells**), and offers for sale / bids to purchase (i.e., **simultaneous PG&E buys/PG&E sells**) of eligible Local and System RA with January through December 2022 delivery periods. PG&E also sought bids to purchase (i.e., **PG&E sells**) for Import Allocation Rights (IAR) monthly products for the January through December 2022 delivery periods. PG&E sought offers for sale (i.e., **PG&E buys**) of WSPP Schedule C Import Energy for the January through December 2022 delivery periods. PG&E did not specify the amounts of RA capacity it wished to purchase but did specify minimum volumes of 1 MW for all products except Import Energy, which had a minimum volume of 5 MW specified.

The Market Notice further noted that PG&E’s preference is to transact Import Energy indexed to CAISO LMP but would also consider offers for ICE Indexed or Fixed Prices transactions. Table 1 below summarizes the products sought in the E-Solicitation.

Table 1. E-Solicitation Products

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

PG&E planned to conduct the E-Solicitation in two Phases. The E-Solicitation protocol for Phase I launched on August 13, 2021 and was intended to seek bids after the CAISO released its Draft 2022 NQC values list. The Market Notice for Phase I required bids and offers to be submitted by August 20, 2021. The E-Solicitation protocol for Phase II launched on September 23, 2021 prior to the CAISO issuing its final NQC list. The Market Notice for Phase II originally required bids and offers to be submitted by September 30, 2021. However, due to a delay in CAISO posting its final NQC list, bids and offers were ultimately not due until October 5, 2021 for Phase II.

PG&E’s Solicitations have evolved into using a predesigned bid input form developed internally at PG&E using MS Excel spreadsheets and containing “macros”, a type of coding language used in the spreadsheets. The purpose of the form has been to ensure that all bids conformed to a specific format containing information related to the bidding entity, what type of RA, IAR, or Import Energy the entity was seeking to purchase or sell, the month and

quantity of the bid, and the price. The bid form has been designed to not allow bidders to change most of the format, thus ensuring consistency and standardization of bids, allowing for PG&E staff to incorporate all bids into its optimization model quickly and accurately.

In a limited number of cases, bidders' email security systems blocked the receipt of the bid form due to the bid forms' use of the macro coding language. In anticipation for this potential issue, PG&E provided the bid form to bidders in a second email, with the market notice email specifying that a second email would contain the form. In doing so, PG&E ensured that bidders received the market notice information and could inquire for the bid form if the original email containing the bid form was blocked by the bidder's security system. In reviewing the email communications surrounding this issue, it is PA's belief that no bidders were blocked from submitting a bid due to email security system issues as PG&E was able and willing to accept bids via written email in exceptional circumstances.

In addition to the email security challenges, it also became apparent that the design of the bid forms restricted certain bidders from accurately defining their bids. This was due to the forms having been designed to limit the number of mutually exclusive bids in any given month. Additionally, some bidders appeared to have confusion as to how to properly utilize the mutually exclusive groupings to their bids. In these cases, PG&E followed up with bidders to ensure that their intention of use of the mutually exclusive groupings was accurately reflected within their bid submittal. The purpose of this limitation was to ensure that PG&E's optimization model could incorporate all bids without causing infeasibly long run times to arrive at the optimal solution providing the most value for PG&E and its customers. As discussed below, bidders have become increasingly reliant upon mutually exclusive bids due to the evolution of PG&E's Local RA requirements.

1.1 PG&E's Local RA Requirements

Resource Adequacy is the primary mechanism to ensure reliability of supply for Load Serving Entities (LSEs) operating under CPUC jurisdiction, including PG&E. RA in California consists of three distinct components: System RA, Local RA, and Flexible RA. LSEs were previously required to procure Local RA on a three-year forward basis. Beginning with compliance year 2023 the responsibility to procure Local RA will belong to newly formed Central Procurement Entities (CPE) operating independently from CPUC jurisdictional LSEs. Due to this policy change, 2022 is the last compliance year in which LSEs are currently anticipated to have a Local RA requirement. System and Flexible are procured on a one-year forward basis; a requirement that remains with individual LSEs, rather than CPEs. LSEs must either self-build or contract for required RA capacity. The CPUC approved a number of key changes to RA procurement that will be discussed in greater detail below, following a discussion of the overall RA markets.

Unlike the centrally cleared capacity auction processes in other markets, RA in California is transacted on a bilateral basis. For a resource to qualify for RA, its contract needs to specify that it will comply with the CAISO's rules for an RA resource which include a must-offer obligation, which requires it to submit self-schedules or bids into the CAISO market and make itself available for dispatch. There is a mechanism to ensure availability called the Resource Adequacy Availability Incentive Mechanism (RAAIM) that charges resources \$3.79/kW-mo for availability shortfalls below 94.5% of its must-offer obligation during certain assessment hours.¹

System Resource Adequacy

System RA requirements are designed to ensure LSEs meet expected peak loads (plus a 15% reserve margin) in the entire CAISO balancing area. In their annual filings (due October of each year), LSEs must demonstrate that they have procured 90% of their System RA

¹ Hours vary by RA type. For generic RA capacity, it is weekdays Hour Ending 17-21, while for Category 1 Flexible RA, hours are daily Hour Ending 6-22.

requirements for the five summer months of that upcoming compliance year (May through September); in their monthly filings, LSEs must show 100% procurement for the upcoming month.

LSEs contract for RA capacity outside of the market-wide solicitations. Solicitations are reviewed by an independent evaluator who reports to the CPUC. Long-term RA contracts for new-build resources are common. However, while LSEs can contract with existing resources for five years or longer, doing so requires that the utility apply to the CPUC for approval, and such contracts have historically been rare; this is because LSEs and the CPUC are wary of locking in capacity given uncertainty around future capacity needs in California's evolving market and policy environment.²

Local Resource Adequacy

Local RA requires LSEs to procure a minimum amount of capacity for transmission-constrained load pockets known as Local Constraint Areas (LCAs), which are determined by CAISO. As additional capacity cannot be reliably transmitted from regions where capacity builds may be more economic into these constrained zones, Local RA contracts are generally of higher value than those for System RA.

As it applies to PG&E, the company had two aggregation areas to address Local RA: PG&E Other and Bay Area. However, in February 2019 the CPUC issued a decision³ that ordered the disaggregation of the six LCAs comprising PG&E Other for Local RA compliance purposes. The CPUC concluded that disaggregation "is a necessary first step towards addressing inefficient procurement that may lead to backstop procurement."

Additional issues raised by the Track 2 Decision, including centralized procurement for RA and the re-aggregation of PG&E Other, are discussed in greater detail below.

Flexible Resource Adequacy

The RA program's final component, Flexible RA, attempts to ensure that LSEs can meet the largest continuous three-hour load ramp need in every month. Utilities must verify their flexible capacity procurement on a monthly and annual basis.

Centralized Procurement

The February 2019 Track 2 Decision arose from a proceeding in Docket R. 17-09-020 which began in January 2018. In this rulemaking, the CPUC sought to evaluate various RA improvements, including the merits of centralized procurement. Under a Centralized Procurement Mechanism (CPM), a Central Procurement Entity (CPE) (e.g., CAISO, large utilities, or a special purpose entity) would procure capacity on behalf of smaller LSEs. In June 2018, the CPUC found that centralized procurement is most appropriate for multi-year Local RA, but that it has drawbacks for System or Flexible RA. In the Track 2 decision, the CPUC formally adopted a set of changes to the RA program, including the multi-year requirements for Local RA procurement, but postponed adoption of a CPM.

Additional stakeholder engagement following the Track 2 Decision led to a June 2020 decision in which the CPUC approved a hybrid model that still allows LSEs to self-supply but designates PG&E and Southern California Edison (SCE) as central buyers for their respective service territories as it applies to Local RA only. Under this hybrid model, LSEs can continue to procure their own resources, and if an LSE-procured resource also meets a Local RA need, the LSE has three options: 1) sell the capacity to the central buyer; 2) utilize the resource for its own System and Flexible RA needs; or 3) voluntarily show the resource to meet its own System and Flexible RA needs, and reduce the amount of Local RA that the central buyer will need to procure for the amount of time the LSE has agreed to show the resource.

Under the third option, the LSE does not receive a 1:1 credit for shown local resources; rather this local procurement reduces total central procurement costs to be shared by all

² Source: CPUC 2013; Review of Current Issues with Long Term Resource Adequacy.

³ Track 2 Decision, D. 19-02-022

LSEs. The LSE will retain the ability to use this local resource for its own System and Flexible needs. The central buyer will then determine what remains to be procured to avoid any local deficiencies. The changes are to take effect beginning with the 2023 compliance year.

A key advantage to the CPE is that the central buyer can more efficiently procure Local RA by selecting the lowest cost and most effective resources. Procurement by individual LSEs could lead to situations in which the most effective resource for overall grid reliability is not procured. For example, LSEs could base local resource decisions on their lowest cost, or local benefits such as providing jobs. This could lead to inefficient procurement and deficiencies at the local level that result in more costly backstop procurement. The centralized structure allows the central buyer to select the most effective local resources for overall grid reliability and also adapt to load uncertainty and migration by equitably allocating Local RA costs directly to end-users.

Additional Track 2 Considerations

In addition to addressing multi-year Local RA procurement and the hybrid model for Local RA procurement in PG&E and SCE service territories, Track 2 sought to make changes to the existing penalty structure for RA deficiency.

One issue relating to penalties imposed for RA deficiencies was that penalty prices were at times set below RA capacity prices, resulting in perverse incentives for LSEs whereby they would simply not procure RA capacity and instead pay the penalty, particularly during summer months when RA prices are at their highest. In order to address this, the CPUC adopted a shaped penalty system that moves October from a winter to a summer month and provides for a penalty of \$8.88/kW-mo during the summer (May-October) and \$4.44/kW-mo in non-summer months.

Track 2 also addressed the PG&E Other LCA, calling for it to be disaggregated into its original six components. At the time, the Commission reasoned that disaggregating was a first step towards addressing inefficient procurement of Local RA. Ongoing Track 2 proceedings evaluated whether the six LCAs comprising PG&E Other should be reaggregated or remain disaggregated. In the June 2020 decision, the Commission stopped short of reaggregating PG&E Other, but it does allow LSEs to demonstrate compliance with Local RA requirements by showing that procurement of Local RA capacity within the LCAs comprising PG&E Other meets the LSE’s collective requirement for the disaggregated PG&E Other LCAs. Thus, aggregated Local RA procurement is essentially still in effect for PG&E Other.

1.2 Conforming and Non-conforming Offers

In prior solicitations, PG&E accepted only those offers which strictly conformed to its bid forms, allowing for evaluation, and shortlisting of multiple bids within the necessary timeframes. Though this process has worked well for PG&E in prior solicitations, PG&E has recognized the merits of considering non-conforming offers in recent solicitations.

[REDACTED]

[REDACTED]

[Redacted text]

[Redacted text]

1.3 Solicitation Bid Evaluations, Shortlisting, and Negotiations

[Redacted text]

[Redacted text]

[Redacted text]

2 INDEPENDENT EVALUATOR ACTIVITIES DURING THE SOLICITATION

This section provides a description of PA's activities as the Independent Evaluator throughout the E-Solicitation, bid selection process, and contract negotiations.

2.1 IE's key roles and responsibilities

The role of the IE is to provide advice to the utility on the design, administration, and evaluation aspects of the E-Solicitation. The CPUC has clarified that the role of the IE is not to conduct or administer the E-Solicitation, but to "separately evaluate and report on the IOU's entire solicitation, evaluation, and selection process."

Additionally, the IE is to ensure that PG&E treats all bidders fairly and equitably and that no particular counterparty is favored. The IE also ensures that the bid selection process is transparent and is aligned with the procurement requirements. PG&E can also call on the IE's advice as to various evaluation issues that may arise during the E-Solicitation process. During the course of this E-Solicitation, PG&E did consult with the IE regarding certain aspects of the evaluation process.

2.2 PA's activities as IE

This section describes the activities PA performed associated with each stage in the E-Solicitation process in the role of IE for the 2022 Annual RA Solicitation. PA was involved from PG&E's development of the E-Solicitation materials in August through the selection of the bids and the negotiation and execution of contracts through October. PA evaluated whether the procedures followed by PG&E were aligned with the process it established in its Solicitation protocol and provided fair and equitable treatment of all bids. PA was in regular contact with PG&E staff throughout the process, addressing PG&E's questions, identifying, and resolving potential issues, and providing recommendations throughout the process.

2.2.1 Solicitation materials

PA reviewed the E-Solicitation protocols prior to the Market Notice issuance and was in contact with PG&E regarding the development of the E-solicitation protocol, evaluation methodology, draft Confirmation Agreement, and other E-Solicitation materials. PG&E provided the draft Confirmation Agreement.

The E-Solicitation email providing Market Notice contained draft Confirmation Agreements (Confirms) for bidders to consider and notified bidders that PG&E would not entertain material revisions to the draft Confirms. An additional email was sent to bidders containing the E-Solicitation bid form.

2.2.2 Bid submittal process

PG&E's bid intake process for the E-Solicitation was conducted entirely via email, including Phase I and II E-Solicitation Market Notices, draft RA Confirms, and Bid Forms. Several bidders submitted both bid forms as well as non-conforming offers via email.

2.2.3 Communication with bidders

PG&E communicated with bidders via email and conference calls. The conference calls were infrequent and often scheduled on short notice.

PA attempted to attend all conference calls with bidders but was unable to attend every single one. PA then closely followed subsequent email communications with the given bidder in light of the call to ensure that PG&E did not provide preferential treatment of any kind to any bidder.

2.2.4 Initial bid review and conformance check

After receiving bids, PG&E conducted a conformance check on each bid to determine its compliance with all bid requirements. Bidders copied PA on initial email contact with PG&E and PA was able to effectively monitor communication between bidders and PG&E.

Given the complexity of the E-Solicitation, with PG&E buying and selling both Local and System RA, the bid forms necessarily included limitations on the number of options – particularly mutually exclusive options – that a bidder could include in their submittal. Multiple bidders contacted PG&E for clarification on how to use the bid form properly to achieve their desired configuration with mutually exclusive options. In some instances, PG&E contacted bidders to clarify the intent of the mutually exclusive grouping options that bidders had submitted in their bid form. PA did not consider the number of questions regarding the bidding process to be excessive, but rather indicative of the evolving nature of RA procurement for all entities as well as the multiple solicitations occurring in California at the same time as LSEs sought to satisfy all of their RA requirements for the upcoming compliance deadlines.

In both phases of the E-Solicitation, PG&E and PA found some bids to be non-conforming.

2.2.5 Evaluation process

PG&E developed an optimization model incorporating PG&E's initial supply positions for System and Local RA; the optimization model and evaluation process are described in detail in Section 4 of this report. PG&E has used this model in prior solicitations and has previously described the model and its methods for ranking, accepting, and rejecting bids based on a combination of bid price and requested volumes, and PA is familiar with the model and comfortable that it equitably determines the optimal combination of shortlisting awards.

While PA did not execute the optimization models, PA assembled a summary of all bids and their shortlisting status and conducted random spot checks of several bids from Phase I and conducted a full reconciliation of all bids from Phase II and their ultimate acceptance or rejection and found no issues with PG&E's ultimate bid shortlisting.

2.2.6 Shortlist determination

The initial proposed Phase I shortlist was provided to PG&E's Procurement Review Group (PRG) and PG&E provided PA with copies of the proposed shortlist. PG&E answered a number of clarifying questions PA had prior to notifying bidders of their shortlisting status. The Phase II shortlist was also provided to PA prior to shortlist notifications. Ultimately, PG&E reviewed with and discussed all shortlists with PA prior to notifying any bidders and incorporated PA's recommendations regarding decisions PG&E faced.

2.2.7 Contract negotiations

To streamline the process and reduce time between shortlisting notifications and Confirm executions, PG&E included the draft Confirmation documents (Confirms) in the E-Solicitation protocols and requested that prospective bidders provide comments and redline edits to the draft Confirms with their bid submittals. PG&E has used this process in recent solicitations, and the majority of bidders to this E-Solicitation have been participating in the majority of these E-Solicitations and typically have few, if any revision requests.

However, this E-Solicitation has seen new participants submitting bids. These participants do not have an existing EEI Master Agreement and were less familiar with PG&E's E-Solicitation process from start to finish, including how to fill out the bid form using the mutually exclusive grouping options. For these bidders, the majority of the negotiations related to the counterparty were for executing an EEI Master Agreement with PG&E as well as the specific terms of the transactions' Confirms.

Overall, bids required multiple email exchanges to come to an agreement on confirm language. [REDACTED]

[REDACTED] In total, between Phase I and Phase II, there were hundreds of emails between PG&E and counterparties. PA monitored all email communications during negotiations.

3 ADEQUACY OF PG&E'S OUTREACH

This section addresses the adequacy of PG&E's outreach for the E-Solicitation as well as the E-Solicitation materials.

3.1 Notifications and announcements

PG&E's outreach included notifications to PG&E's E-Solicitation RA list containing almost 500 email addresses. PA observed heightened interest in PG&E's E-Solicitation relative to prior solicitations and believes that between this general market awareness of RA procurement activities and PG&E's efforts to publicize its E-Solicitation, PG&E extended adequate outreach for the Solicitation.

3.2 Solicitation materials

PG&E created E-Solicitation Market Notices and associated materials for each Phase of the E-Solicitation. The E-Solicitation materials were provided to PG&E's Solicitation email distribution list in the E-Solicitation outreach, including the Market Notice, draft Confirm, and the bid submittal form developed by PG&E. The Market Notice included information on the types of products PG&E was seeking and over what term, as well as a proposed E-Solicitation evaluation schedule.

In PA's opinion, PG&E provided appropriate E-Solicitation materials and provided prompt response to any questions received by potential bidders.

4 PG&E'S BID EVALUATION DESIGN

This section describes PG&E's bid evaluation methodology for the E-Solicitation.

4.1 Principles used to evaluate methodology

PA used the following principles to guide its evaluation:

- The procurement targets and objectives should be clearly defined in PG&E's E-Solicitation materials;
- The evaluation should only be based on those criteria requested in the response form;
- The methodology should identify how quantitative measures will be considered and be consistent with an overall metric;
- The approach should not be biased for or against specific counterparties; and
- The methodology does not have to be the one that the IE would independently have selected but it needs to be "reasonable".

4.2 Amount and type of RA products

In this E-Solicitation, PG&E sought offers for sale (i.e., **PG&E buys**), bids to purchase (i.e., **PG&E sells**), and offers for sale / bids to purchase (i.e., **simultaneous PG&E buys/PG&E sells**) of eligible Local and System RA with January through December 2022 delivery periods. PG&E also sought bids to purchase (i.e., **PG&E sells**) for IAR monthly products for the January through December 2022 delivery periods. PG&E sought offers for sale (i.e., **PG&E buys**) of WSPP Schedule C Import Energy for the January through December 2022 delivery periods. PG&E did not specify the amounts of RA capacity it wished to purchase but did specify minimum volumes of 1 MW for all products except Import Energy, which had a minimum volume of 5 MW specified.

The Market Notice further noted that PG&E's preference is to transact Import Energy indexed to CAISO LMP but would also consider offers for ICE Indexed or Fixed Prices transactions.

4.3 Description of PG&E's bid evaluation methodology

PG&E's valuation and selection approach was intended to evaluate the different product types as consistently as possible. The initial step included a conformance check of each offer. The conforming offers then went through an optimization analysis designed to maximize ratepayer value while maintaining compliance with RA requirements. The methodology considered both quantitative as well as qualitative factors as described below.

4.3.1 Conformance check

The initial analysis included an assessment of conformance. All offers needed to conform to the minimum participation criteria and eligibility. The E-Solicitation was less complex than other procurement processes in which the utility is seeking to acquire resources, and as such had more limited conformance requirements.

The conformance requirements were generally limited to the following required documents:

- A redline mark-up of the RA Confirmation or a statement that the bidder accepts PG&E's form RA Confirmation without change; and

- An RA Bid Form Template, indicating the types, delivery term, and volumes the bidder wished to purchase.

As noted above, PG&E determined that non-conforming bids would be accepted and reviewed after conforming offers were evaluated for shortlisting. These included complex, mutually exclusive RA bids which could not be accommodated in PG&E's bid forms as well as more atypical bids involving project or resource specific bids and other types of bids. PA is not aware of any bids which were rejected for non-compliance nor of any late bids which were rejected due to being submitted past the submittal deadlines.

4.3.2 Quantitative bid evaluation

PG&E primarily relied on a quantitative evaluation of each bidder's proposed volumes of RA to be purchased or sold and the bidder's proposed price for each product.

[REDACTED]

[REDACTED]

[REDACTED]

Development of supply curves

[REDACTED]

[REDACTED]

Bid optimization

[REDACTED]

[REDACTED]

[REDACTED]

4.4 Evaluation of PG&E's methodology

PA generally believes that PG&E's methodology was reasonable, within the context of the principles set forth in Section 4.1.

5 FAIRNESS OF PG&E BID EVALUATION

This section addresses the application or administration of the methodology described in Section 4.

5.1 Principles IE used to evaluate evaluation methodology

As in the previous section, PA used the following principles to guide its evaluation, and in this case phrased as questions:

- Were bidder questions answered fairly and consistently and the answers made available to all?
- Did the utility ask for "clarifications" that provided the bidder an advantage over others?
- Were all bids given equal credibility in the economic evaluation?

5.2 Administration of bid evaluation process

A description of PA's activities in its role as IE is provided in Section 2. Based on PA's participation and observations we believe that:

- Bidder questions were answered fairly and consistently
 - PA monitored all communications between bidders and PG&E including questions, and believes the questions posed were reasonably and fairly answered
- PG&E's clarification questions were minimal and reasonable, and did not advantage any bidder;
- PG&E applied conformance requirements fairly to all bids and consistent with bid documents;
- All conforming bids were given equal credibility in the quantitative evaluation;
- Bids were ranked and evaluated as consistently as possible; and
- PG&E's evaluation of bids and selection of shortlisted bids conformed to the E-Solicitation documents.

5.3 IE's review of PG&E's conformance checks

After the Phase I and II bids were submitted and the E-Solicitation closed, PG&E began an initial conformance check. PA also received a complete copy of all the bids as they were submitted. There were several bidders whose bid forms had unclear proposals with regard to the application of the mutually exclusive grouping options; for these bids PG&E contacted the bidder and clarified the bid. PA was included on all such communications. Given the E-Solicitation was relatively straightforward with few requirements, PA did not anticipate and is not aware of any bids which PG&E rejected for non-conformance.

5.4 Review of PG&E's application of the bid evaluation methodology

5.4.1 Review of evaluation of offers

PA reviewed PG&E's quantitative evaluation through a spot checking of individual bids and their acceptance for shortlisting or rejection by PG&E. This process and spot checking occurred for Phase I bids. For Phase II bids, PA manually reconciled every individual bid's acceptance for shortlisting or rejection by PG&E.

Through this process, PA was able to review and confirm PG&E's interpretation of the original bid data as well as the application of the optimization modeling. [REDACTED]



5.5 IE's review of PG&E's selected shortlists

PA held discussions with PG&E regarding each of its proposed shortlists in Phase I and Phase II.



PA believes the final Phase I and II shortlists were selected appropriately.

5.6 Fairness of PG&E's evaluation

Based on PA's review of PG&E's analysis, participation in calls and meetings and other IE activities, PA believes that PG&E conducted the 2022 Annual RA Solicitation evaluation analysis fairly.

5.7 Recommendations

PA believes that PG&E conducted the 2022 Annual RA Solicitation evaluation in a fair and consistent manner and that the E-Solicitation process went reasonably smoothly.

While PA found the timeline for this E-Solicitation to be relatively short, we found that the majority of the time spent on the negotiations for the transactions was spent on negotiating language in the Confirm agreements related to the transactions. In most of these cases, the counterparties had transacted with PG&E previously and as such the Confirm negotiation period appeared reasonable.

Specific to the bid evaluation process and timeline, PA recommends that wherever possible, in future solicitations PG&E allow for additional time to conduct the quantitative evaluations. PA understands that the timeframes for both the Phase I and Phase II evaluations were driven by the timing of the preliminary and final RA allocations released by the CPUC and the final NQC determinations by the CAISO relative to the compliance filing requirement.



Lastly, although many bidders participating in the 2022 Annual RA Solicitation had participated in previous PG&E solicitations, there were new participants to the E-Solicitation. As such, for future large or annual solicitations, PA recommends that PG&E host a pre-bid conference to discuss how to appropriately complete the bid form. In the 2022 Annual RA Solicitation, PG&E answered bidders' questions effectively. However, a pre-bid conference could help dispel any confusion to new bidders, or bidders with employees new to PG&E's solicitations.

PA believes PG&E conducted the 2022 E-Solicitation relatively smoothly and effectively.

6 MERIT OF SOLICITATION SHORTLIST

Through the bid evaluation and selection process, PA believes that PG&E selected the best offers submitted for the 2022 Annual RA Solicitation.

6.1 Did PG&E conduct the Solicitation consistent with Commission decisions and PG&E's defined bid evaluation methodology?

It is PA's opinion that PG&E conducted a fair solicitation consistent with Commission decisions and PG&E's defined bid evaluation methodology.

6.2 Do selected shortlisted bids provide the best overall value to ratepayers?

PA believes PG&E fairly selected its shortlists of bids for the Solicitation and that the bids provide the best overall value to ratepayers.

6.3 Did the shortlist conform to PG&E's RA sales strategy?

The shortlists prepared by PG&E did conform to the RA sales strategy.

6.4 Reasonableness of the shortlist

In PA's opinion, PG&E's shortlists were reasonable.

7 FAIRNESS OF PROJECT-SPECIFIC NEGOTIATIONS

PA closely monitored the contract negotiations and PG&E provided PA copies of contract drafts, included PA on e-mails, and instructed counterparties to include PA on all communications.

7.1 Principles PA used to evaluate fairness of negotiations

PA applied the following three principles to evaluate the fairness of negotiations:

- PG&E should not show bias toward any bidder by allowing contract conditions not offered to other bidders unless those conditions are balanced by comparable concessions by the bidder;
- PG&E should not negotiate harder or less hard with a bidder than with any other bidder; and
- PG&E should not attempt to impose contract conditions in the negotiation that significantly change the balance of the bargain, relative to what the bidder could have reasonably expected based on the E-Solicitation protocol materials.

7.2 Describe fairness of negotiations

PA received copies of red-lined draft contract documents to review and was copied on all emails between PG&E and bidders. PA believes that PG&E treated bidders consistently and fairly relative to each other (the first two principles above).

7.3 What terms and conditions underwent significant changes during the course of negotiations?

PG&E provided bidders a draft RA Confirm agreement with the initial E-Solicitation materials. Providing draft contracts prior to bid submittal is beneficial for both the bidders and PG&E. Draft contract documents provide bidders more clarity on the product, risk sharing, technical and other factors so that they are able to design and price their offers appropriately. It also can improve PG&E's ability to evaluate the bids when the requirements and parameters are clearly identified as part of the bidding process.

Generally, most counterparties who ultimately executed transactions via the E-Solicitation are familiar with PG&E's Confirms and the negotiations were straightforward and quickly concluded. To the extent that certain bidders had multiple emails and in some cases telephone conference calls with PG&E, these cases tended to be instances where the counterparty and PG&E were exploring specific nuances.

7.4 Was similar information and options made available to other participants?

PA believes that similar information and options were made available to each participant.

8 MERIT OF CONTRACT APPROVAL

PG&E negotiated and signed a total of [REDACTED] contracts through this E-Solicitation, including PG&E [REDACTED] in Phase I and Phase II of the E-Solicitation. These contracts will involve [REDACTED]. Additionally, from Phase II of the E-Solicitation, PG&E currently has [REDACTED]

Through the bid evaluation and selection process, PA believes that PG&E selected appropriate offers. Based on the analysis and assumptions described throughout this report, PA recommends approval of these transactions.

Advice 6387-E-A
April 13, 2022

Attachment 4

Confidential Attachment G

Final Phase I and II Multi-Year RA Solicitation IE Report

Advice 6387-E-A
April 13, 2022

Attachment 5

Confidential Attachment K

RPC Paper

Advice 6387-E-A
April 13, 2022

Attachment 6

Confidentiality Declaration and Matrix

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING
SUPPLEMENTAL ADVICE LETTER 6387-E-A**

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S
SUPPLEMENTAL ADVICE LETTER 6387-E-A,
Q3 2021 QCR CONFIDENTIAL ATTACHMENTS 1 AND 2:
REVISED NON-INVESTMENT GRADE COUNTERPARTIES (ATTACHMENT B);
CONFIDENTIAL ATTACHMENT 4: FINAL PHASE 1 AND II MULTI-YEAR RA
SOLICITATION IE REPORT (ATTACHMENT G);
CONFIDENTIAL ATTACHMENT 5: RPC PAPER (ATTACHMENT K)**

I, Marianne Aikawa, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1989. My current title is Interim Director within PG&E's Energy Policy and Procurement organization. In this position my responsibilities include reviewing regulatory reports. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.
2. Based on my knowledge and experience, and in accordance with Decisions ("D.") 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's April 13, 2022 Supplemental Advice Letter 6387-E-A, Q3 2021 QCR for Confidential Attachments 1 and 2 Revised Non-Investment Grade Counterparties (Attachment B); Confidential Attachment 4 Final Phase I and II Multi-Year RA Solicitation I.E. Report

(Attachment G); Confidential Attachment 5 RPC Paper (Attachment K) .

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-066, 14-10-033, and/or Public Utilities Code Section 454.5(g). The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on April 13, 2022, at San Francisco, California.

/s/

Marianne Aikawa

**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E-A
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021
 APRIL 13, 2022**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Document: Quarterly Compliance Report - Supplemental Advice Letter 6387-E-A			
<p>Atch 1 Revised Q3 2021 Conf Attachment B-CLEAN.doc</p> <p>Atch 2 Revised Q3 2021 Conf Attachment B-REDLINE.doc</p>	Public Utilities Code Section 454.5(g)	The information contains confidential counterparty information. Release of this commercially market sensitive information could impact market prices because it would release financing terms to other market participants and impact future negotiations. This could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of counterparty information. This information could be used by other market participants to gain a commercial advantage.	3 Years
<p><i>GHG related content in these attachments:</i></p> <p>Atch 1 Revised Q3 2021 Conf Attachment B-CLEAN.doc</p> <p>Atch 2 Revised Q3 2021 Conf Attachment B-REDLINE.doc</p>	<p>D.14-10-033</p> <p>Public Utilities Code Section 454.5(g)</p>	<p>This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.</p>	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E-A
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021
 APRIL 13, 2022**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Atch 4 Conf Attachment G-2022 Annual ESol IE Rpt.pdf	<p>Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)</p> <p>Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;</p> <p>Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids</p>	<p>Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.</p> <p>Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.</p>	3 years, except for the delivered product price of RA and RPS sales transactions, which are only confidential for two quarters following the month of delivery. Other non-public terms are confidential for three years from date contract states deliveries to begin; or until one year following expiration, whichever comes first.
Atch 5 Conf Attachment K-RPC Paper.pdf	Public Utilities Code 454.5(g)	Risk and Strategy papers are proprietary company information that if made public could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage.	Indefinite

**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.
Braun Blasing Smith Wynne, P.C.
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
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
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

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

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

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Uplight
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy