

**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 "Pete Skala".

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



**Sidney Bob Dietz II**  
Director  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B13U  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415-973-3582

November 1, 2021

**Advice 6387-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

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

**Purpose**

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) its compliance submittal for Q3 2021 in conformance with PG&E’s 2014 BPP approved in D.15-10-031. PG&E’s submittal of this Procurement Transaction Quarterly Compliance Report (“QCR”) for record period July 1, 2021 through September 30, 2021, (Q3, 2021) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports be submitted within 30 days of the end of the quarter.

**Background**

In D.07-12-052, the Commission directed Energy Division and the Investor-Owned Utilities (“IOUs”) to continue the collaborative effort to develop a reformatted QCR. The Commission authorized Energy Division to implement a reformatted QCR and to make ministerial changes to the content and format of the report as needs arise. Energy Division and the IOUs finalized the QCR format in December 2008. This QCR is consistent with the final format authorized by Energy Division on December 15, 2008.

**Compliance Items**

Attachment 1 to this Advice Letter includes a narrative with supporting Confidential Attachments that conforms to the reformatted QCR. The public version of Attachment 1 includes the Narrative, which is not confidential. Attachments 2, 3 and 4 include the public versions of Attachments G and H, respectively. The confidential version of the QCR includes the following supporting Confidential Attachments:

- Attachment A: Q3 2021 Electric and Natural Gas Transactions
- Attachment B: Q3 2021 Counterparty Information
- Attachment C: Q3 2021 Electric Transactions Summary
- Attachment D: Q3 2021 Natural Gas Transactions Summary

Attachment E:	Q3 2021 Other Transactions
Attachment F:	Q3 2021 Key Briefing Packages
Attachment G:	Q3 2021 Independent Evaluator (IE) Reports
Attachment H:	Q3 2021 Contracts Executed/Contracts Amended
Attachment I:	Q3 2021 Summary of Retained Generation Investments Completed
Attachment J:	System Load Requirements/Conditions
Attachment K:	Risk Management Strategy Communication and Management Disclosure
Attachment L:	Reasonable Number of Analyses Models, Description of Models, and How Models Operate
Attachment M:	Q3 2021 Transactions Subject to Strong Showing

Attachment 5 to this Advice Letter includes confidentiality declarations and a matrix.

The public version of this QCR is provided to the service lists for Rulemakings (“R.”) 16-02-007. The confidential version of the QCR is provided to PG&E’s Procurement Review Group.

This submittal will not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

### **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](mailto:EDTariffUnit@cpuc.ca.gov) and [PGETariffs@pge.com](mailto: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 22, 2021, which is 21 days<sup>1</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](mailto: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.

---

<sup>1</sup> The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B13U  
P.O. Box 770000  
San Francisco, California 94177

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

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

### **Effective Date**

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is December 1, 2021, which is 30 days after the date of submittal.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter excluding the confidential appendices is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for R.16-02-007. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail 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. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs>.

\_\_\_\_\_/S/\_\_\_\_\_  
\_\_\_\_\_

Sidney Bob Dietz II  
Director, Regulatory Relations

cc: Service List R.16-02-007 (Public Version)  
PG&E's Procurement Review Group (Confidential Version)

Public Attachments:

Attachment 1: Narrative

Attachment 2: Attachment G-1 (Public Version)

Attachment 3: Attachment G-2 (Public Version)

Attachment 4: Attachment H (Public Version)

Attachment 5: Confidentiality Declarations and Matrix



# 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) #: 6387-E

Tier Designation: 2

Subject of AL: 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: Jay Bukowski (415) 973-1727, John Ulloa (415) 973-0535

Resolution required?  Yes  No Marianne Aikawa (415)973-0375, Kelly Everidge (415)973-2055

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 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:

Advice 6387-E  
November 1, 2021

# **Attachment 1**

Narrative

**PACIFIC GAS AND ELECTRIC COMPANY**  
**PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT**  
**FOR THE THIRD QUARTER OF 2021**

**November 1, 2021**

## TABLE OF CONTENTS

A. Introduction.....	1
B. Summary.....	1
1. Competitive Solicitations (Approval Through the QCR).....	1
2. Other Competitive Solicitations (Approval Through Separate Advice Filing or Regulatory Process).....	1
3. Other Procurement Activities (Approval Through the QCR).....	2
a) Electric Transactions.....	2
b) Gas Transactions.....	2
4. Other Procurement Activities (Approval Through Separate Advice Filing or Regulatory Process).....	2
C. Master Data Request (MDR) Documentation.....	3
1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.....	3
2. The briefing package provided to the ultimate decision maker.....	4
3. Description of and justification for the procurement processes used to select the transactions.....	4
a) Electric Procurement – Description.....	4
b) Electric Procurement – Justification.....	4
c) Natural Gas Procurement – Description.....	7
d) Natural Gas Procurement – Justification.....	8
e) GHG and Other Commodities.....	10
4. Explanation/justification of the timing of the transactions.....	10
a) Electric Transactions.....	10
b) Natural Gas Transactions.....	11
5. Discussion of the system load requirements/conditions underlying the need for the Quarter’s transactions.....	11
a) PG&E Participation in the CAISO Markets.....	11
b) PG&E-Owned Generation Conditions During Q3 2021.....	11
6. Discussion of how the Quarter’s transactions meet the goals of the risk management strategy reflected in the Plan.....	13
7. Copy of each contract.....	13
8. The valuation results for the contract(s) (for contracts of three months or greater duration).....	13
9. An electronic copy of any data or forecasts used to analyze the transactions.....	13
10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.....	14

TABLE OF CONTENTS  
(CONTINUED)

11. Any other information sought by the Commission under the Pub. Util. Code.....14  
D. Additional Reporting Requirement Pursuant to D.07-01-039 .....14  
E. Cost Allocation Mechanism.....14

## **Summary of Public Attachments**

- Public Attachment G: *Independent Evaluator Reports*, provides any relevant Independent Evaluator (IE) report(s) completed during the Quarter redacted to protect confidential information.
- Public Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter redacted to protect confidential information.

## **Summary of Confidential Attachments**

- Confidential Attachment A: *Transactions*, provides a summary of all transactions executed during the Quarter, which are less than five years in length and that have not been filed through a separate advice filing or application.
- Confidential Attachment B: *Counterparty Information*, provides a summary of (1) all non-investment grade counterparties with whom PG&E transacted; and (2) the top 10 counterparties by volume during the Quarter.
- Confidential Attachment C: *Electric Transactions Summary*, provides a summary of the electric transactions executed during the Quarter.
- Confidential Attachment D: *Natural Gas Transactions Summary*, provides a summary of the gas transactions executed during the Quarter.
- Confidential Attachment E: *Other Transactions*, provides the executed transactions resulting from non-energy-related products during the Quarter.
- Confidential Attachment F: *Key Briefing Packages*, provides a summary of all relevant Procurement Review Group (PRG) agendas and presentations presented.
- Confidential Attachment G: *Independent Evaluator Reports*, provides any relevant IE report(s) completed during the Quarter.
- Confidential Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter.

**Summary of Confidential Attachments**  
**(Continued)**

- Confidential Attachment I: *Summary of Retained Generation Investments Completed*, provides a summary of any investments related to retained generation facilities and multiple contracts for the same supplier, resource or facility, consistent with the requirements of Decision (D.) 07-01-039.
- Confidential Attachment J: *System Load Requirements/Conditions*, provides a summary of all information related to addressing PG&E's residual net open position.
- Confidential Attachment K: *Risk Management Strategy Communication and Management Disclosure*, provides a summary of all procurement-related risk strategies and issues communicated to PG&E's senior management.
- Confidential Attachment L: *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*, provides a summary of any models related to the relevant transactions identified in this filing.
- Confidential Attachment M: *Transactions Subject to Strong Showing*, provides a summary and supporting documentation for strong showing transactions.

## **A. Introduction**

As required by Ordering Paragraph (OP) 8 of D.02-10-062, and clarified in D.03-06-076, D.03-12-062, D.04-07-028, D.04-12-048 and D.07-12-052, Pacific Gas and Electric Company (PG&E) hereby provides its report demonstrating that its procurement-related transactions during the period July 1, 2021 through September 30, 2021 (Quarter), were in compliance with PG&E's Bundled Procurement Plan (BPP or Plan) approved by the California Public Utilities Commission (CPUC or Commission) in D.15-10-031.

PG&E manages its transactions in compliance with its BPP. During the Quarter, PG&E did not have any BPP activity updates.

## **B. Summary**

During the Quarter, PG&E engaged in the following procurement activities in accordance with its BPP-approved procurement methods and practices:

### **1. Competitive Solicitations (Approval Through the QCR)**

- a. None for the Quarter.

### **2. Other Competitive Solicitations (Approval Through Separate Advice Filing or Regulatory Process)**

PG&E is seeking approval for BPP products through separate advice filings or other regulatory processes and are referenced here for informational purposes only:

- a. Bioenergy Market Adjusting Tariff (monthly auctions), ongoing
- b. Renewable Market Adjusting Tariff, ongoing
- c. PG&E Summer 2022 Expedited Procurement (issued February 16, 2021)
- d. Spring 2021 Bundled RPS Energy REC Sale Solicitation (issued April 19, 2021)
- e. Mid-Term Reliability RFO-Phase 1 (issued June 18, 2021)
- f. Summer 2021 Bundled RPS Energy Sale Solicitation (Issued July 30, 2021)

### **3. Other Procurement Activities (Approval Through the QCR)**

PG&E also seeks approval of transactions executed from the following procurement activities, other than competitive solicitations, through the Quarterly Compliance Report (QCR).

#### ***a) Electric Transactions***

- i. California Independent System Operator (CAISO) Allocations*
  - a. CAISO Monthly Congestion Revenue Rights (CRR) Allocation Processes
  - b. CAISO 2022 Annual CRR Tier 1 Allocation and Long-Term Tier Allocation Process
- ii. CAISO Markets and Processes*
  - a. Convergence Bidding
- iii. Direct Bilateral Contracting for Short-Term Products*
- iv. Bilateral Negotiated Contracts*
- v. Electronic Solicitations issued by PG&E*
- vi. Market Request for Proposal (RFP)*
- vii. Transparent Exchange*

#### ***b) Gas Transactions***

- i. Transparent Exchanges*
- ii. Direct Bilateral Contracting for Short-Term Products*
- iii. Voice Brokers*
- iv. Electronic Solicitations*
- v. Cashouts*

These procurement activities are described in greater detail in Section C.3, below.

### **4. Other Procurement Activities (Approval Through Separate Advice Filing or Regulatory Process)**

During the Quarter, approval of contracts resulting from the following procurement activities was requested through separate advice filings or regulatory processes and are referenced here for informational purposes only:

- a. Bilaterally negotiated contracts or amendments executed pursuant to other regulatory requirements.
  - i. None for the Quarter.*

- b. Qualifying Facility (QF) contracts or amendments executed pursuant to other regulatory requirements.

- i. *None for the Quarter.*

- c. Summer Reliability

In response to the rotating blackouts that occurred during the August 2020 heat storm, the CPUC opened an Emergency Reliability Rulemaking (R.20-11-003) to make more resources available on an expedited basis to prevent a recurrence of blackouts if the western United States experiences extremely high temperature, sustained weather events in summer of 2021.

- i. *PG&E will be requesting cost recovery via the Cost Allocation Mechanism (CAM) for five Resource Adequacy (RA) transactions, and one Import Allocation Rights transaction executed during the Quarter in compliance with D.21-03-056. These transactions are detailed in Confidential Attachment H (Info Only-Other tab). PG&E will submit these transactions for approval via Advice Letter Filing.*

### **C. Master Data Request (MDR) Documentation**

D.02-10-062, Appendix B, as clarified by D.03-06-076, sets forth specific elements to be addressed in this report. Each element is discussed below.

#### **1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.**

All procurement-related activity during the Quarter was approved and executed either by, or under the direction of, Fong Wan, Senior Vice President, Energy Policy and Procurement; Martin Wyspianski, Senior Director, Electric and Gas Acquisition; Gillian Clegg, Senior Director, Energy Portfolio Procurement and Policy; Don Howerton, Director, Structured Energy Transactions; Scott Ranzal, Director, Portfolio Management; Chris McNeece, Director, Short-Term Electric Supply; and/or John Ulloa, Manager, Electric Gas Supply consistent with the delegation of authority effective for the period.

**2. The briefing package provided to the ultimate decision maker.**

The “decision-maker” for a particular contemplated transaction depends on many factors, such as term, volume, and notional value. For many of the transactions during the Quarter, the “decision-maker” was a gas or power trading employee executing transactions per an established plan or to achieve a particular objective (such as balancing the portfolio supply and demand). For such transactions, briefing packages are not prepared. Briefing packages prepared during the Quarter for transactions or procurement activities that required senior management approval are included in Confidential Attachment K. In addition, copies of presentations made by PG&E to its PRG during the Quarter are included in Confidential Attachment F.

**3. Description of and justification for the procurement processes used to select the transactions.**

***a) Electric Procurement – Description***

PG&E is authorized to use any of the following BPP-approved electricity procurement transaction processes during the Quarter:

- Competitive Solicitations
- CAISO Allocations
- CAISO Markets and Process
- Direct Bilateral Contracting for Short-Term Products
- Bilateral Negotiated Contracts
- Electronic Solicitations issued by PG&E
- Market RFP
- E-Solicitation, Transparent Exchanges, Voice and On-Line Brokers
- Public Utility Regulatory Policies Act (PURPA) Standard Offer Contracts (SOC) *(for informational purposes only); and*
- Pro forma contracts executed under the CHP Feed-In Tariffs Program *(for informational purposes only).*

***b) Electric Procurement – Justification***

- i. For competitive solicitations held by PG&E, describe the process used to rank offers and select winning bid(s).*

None for the Quarter.

- ii. *For other transactional methods, provide the documentation supporting the selection of the chosen products.*

The approved procurement processes used during the Quarter and supporting documentation include the following:

- CAISO Allocations

- CAISO Monthly CRR Allocation Process

- PG&E procures CRRs to narrow the distribution of PG&E's energy procurement costs due to expected electric transmission congestion. PG&E obtains CRRs, subject to risk assessment, for specific source/sink combinations as approved in its BPP.

- PG&E acquires CRRs for any path (represented by a source-sink pair) connecting existing generation sources to existing loads (e.g., retail loads and Helms pumping load) or for any path that PG&E reasonably anticipates that it might need to flow energy in the future due to the addition of new contracts, resources or load obligations. Additionally, there may be CRRs which are positively correlated in value with CRRs for paths that have limited availability. PG&E is also authorized to acquire CRRs for such positively correlated paths.

- In July 2021, August 2021, and September 2021, PG&E participated in the CAISO's monthly CRR allocation processes to procure CRRs for August 2021, September 2021, and October 2021, respectively.

- PG&E's procurement during the Quarter was consistent with PG&E's updates to its BPP CRR (Appendix I) filed in AL 5473-E, effective May 30, 2019.

- CAISO Annual CRR Allocation Process

- PG&E participated in the 2022 Tier 1 and Long-Term Tier Allocation Processes. Awards from Tier 1 were posted on September 14, 2021 and for the Long-Term Tier on September 28, 2021. Results will be available in the next QCR.

- PG&E's procurement during the Quarter was consistent with PG&E's updates to its BPP CRR (Appendix I) filed in Advice Letter 5473-E, effective May 30, 2019.

- Relevant information for the Monthly CRRs is included in Confidential Attachments F, J and L.

- CAISO Markets and Processes

- Convergence Bidding

- PG&E suspended Convergence Bidding activities after trade day May 26, 2018. As of September 30, 2021, all Convergence Bidding activities remain

suspended. Relevant information is included in Confidential Attachment E, F and J.

- Direct Bilateral Contracting for Short-Term Products

Transmission capacity is purchased to relocate power from one point to another, often necessary outside a Regional Transmission Operator such as the CAISO. Relevant information is included in Confidential Attachment A.

- Bilateral Negotiated Contracts

Resource Adequacy – During the Quarter, PG&E executed transactions consisting of the following types: (1) System RA purchase transactions; (2) System RA sale transactions; (3) System Flexible RA purchase transactions; (4) System Flexible RA sale transactions; (5) Local Flexible RA purchase transactions; (6) Local Flexible RA sale transactions; (7) Local RA purchase transactions; and (8) Local RA sale transactions. Relevant information is included in Confidential Attachment E, F, H and M.

- Electronic Solicitations issued by PG&E

Resource Adequacy – During the Quarter, PG&E executed the transactions consisting of the following types: (1) Local RA purchase transactions; (2) Local RA sale transactions; (3) Local, Flexible RA purchase transactions, (4) System RA purchase transactions (5) System RA sale transactions; (6) System Flexible RA purchase transactions; and (7) System Flexible RA sale transactions.

PG&E held two E-Solicitations in the quarter that were monitored by an IE: (1) The October-December 2021 RA and Import Energy E-Solicitation, issued July 8, 2021, and (2) The 2022 Annual Resource Adequacy and Import Energy E-Solicitation, Phase 1, issued August 13, 2021. PG&E held a third E-solicitation, Nov-Dec RA E-Solicitation, issued August 30, 2021 requesting offers to purchase RA<sup>1</sup>. As a result, from the E-solicitations, PG&E executed transactions consisting of the following product types: (1) System RA purchase transaction; (2) System, Flexible RA purchase transaction; (3) Local RA purchase transactions; (4) Local, Flexible RA purchase transaction; (5) System RA sale transactions; (6) System, Flexible RA sale transactions; and (7) Local RA sale transactions.

For the 2022 Annual Resource Adequacy and Import Energy E-Solicitation Phase 1, PG&E has included a Project Status Memo written by the IE regarding the transactions executed in this Quarter. The final 2022 Annual Resource Adequacy and Import Energy E-Solicitation IE report will be available upon conclusion of Phase 2 of this Solicitation in Q4 2021. PG&E will supplement this Advice Letter filing with the final IE report.

---

<sup>1</sup> PG&E's BPP, Appendix M, PRG, CAM Group, and IE Administration, Section B.2, requires an IE in PG&E solicitations that sell RA products.

Relevant information is included in Confidential Attachments E, F, G and H.

- Market RFP

Resource Adequacy – During the Quarter, PG&E participated in two Market RFPs. As a result, PG&E executed the following product types:(1) Local RA purchase transaction; (2) System RA sale transaction; and (3) Local RA sale transactions. Relevant information is included in Confidential Attachments E, F, and H.

- E-Solicitation, Transparent Exchange, or Voice and On-Line Brokers

During the Quarter, PG&E executed electric financial transactions via E-Solicitation. Relevant information is included in Confidential Attachments A and L.

- PURPA SOC (for informational purposes only)

Under the PURPA SOC Program, QF generators may enter into PG&E’s pro forma SOC for QFs up to 20 megawatts (MW). In addition, many of the remaining legacy QF contracts are still active and may require amendments or letter agreements to help the generator meet the requirements of the Commission’s CHP Program (e.g., greenhouse gas (GHG)) administration and metering issues) that were not required under the former program. Relevant information is included in the “Informational Purposes Only” Section of Attachment H.

- CHP Feed-In Tariffs (for informational purposes only)

Under the Waste Heat and Carbon Emissions Act, codified as California Public Utilities Code (Pub. Util. Code) Section 2840 et seq. (Stats. 2007, Ch. 713), the Commission established a standard tariff for the sale of electricity from efficient CHP systems under 20 MW and directed the electrical corporations to purchase excess electricity from eligible CHP generators. A CHP generator that is certified by the California Energy Commission (CEC) is eligible under the CEC’s legal and technical guidelines to obtain a CHP feed-in tariff. In D.09-12-042, the Commission approved three pro forma contracts for use with CHP systems (known as “AB 1613 PPAs”) that are applicable to generators of different sizes: a standard contract for CHP generators up to 20 MW, a simplified PPA for CHP generators less than 5 MW, and a further simplified PPA for smaller CHP systems under 500 kilowatts. Relevant information is included in the “Informational Purposes Only” section of Attachment H.

***c) Natural Gas Procurement – Description***

PG&E procured natural gas during the Quarter using various BPP-approved procurement processes and methods, including:

- Competitive Solicitations

- Transparent Exchanges
- Direct Bilateral Contracting for Short-Term Products
- Voice and On-Line Brokers
- Electronic Solicitations
- Cashouts

**d) *Natural Gas Procurement – Justification***

i. *For competitive solicitations (RFO), describe the process used to rank offers and select winning bid(s).*

None for the Quarter.

ii. *For other transactional methods, provide the documentation supporting the selection of the chosen products.*

- Transparent Exchanges: Electronic trading exchanges for transparent prices:

Commodity Purchases/Sales – PG&E buys and sells physical natural gas on Intercontinental Exchange (ICE) and the ICE Natural Gas Exchange (NGX) physical clearing service. ICE is an electronic system that matches buyers and sellers of natural gas products. Once buyer and seller are matched, ICE trades become bilateral trades. ICE/NGX trades are cleared by NGX, rather than bilaterally. Physical transactions in the Quarter include next-day and same-day transactions, for delivery periods of one to five days, and monthly transactions for deliveries each day of a calendar month. Relevant information of transactions executed via Transparent Exchanges during the QCR period is included in Confidential Attachment A.

Gas Financial Transactions – PG&E’s procurement during the Quarter is consistent with PG&E’s updates to its BPP Hedging Plan (Appendix E) filed in AL 6051-E.

Gas Financial Transactions are cleared through exchanges (ICE or the New York Mercantile Exchange (NYMEX)). ICE and NYMEX provide access to anonymous bids and offers establishing both a liquid and robust market for financial products, and a benchmark for over-the-counter products. These products include Henry Hub futures and options, locational options, and basis futures against the industry benchmark indices, including Gas Daily, Natural Gas Intelligence (NGI) and Inside Federal Energy Regulatory Commission (FERC) Gas Market Report. Details demonstrating PG&E’s compliance with D.15-10-031 during the Quarter are included in Confidential Attachments J and L. Relevant information is included in Confidential Attachment A.

- Direct Bilateral Contracting for Short-Term Products

Commodity Purchases/Sales – PG&E buys and sells physical gas directly with counterparties in the bilateral market. Spot gas (deliveries less than one month) is traded at fixed prices and daily index (Gas Daily). Prompt month supply (deliveries each day of the following month) and term gas (greater than one month forward or one month in duration) is traded at fixed price, daily index (Gas Daily), or monthly or bi-week index (NGI, or IFERC) prices. For any bilateral physical supply trades with a term of one month, PG&E concluded these transactions bilaterally, but also used electronic solicitation methods, such as instant messaging, e-mail, voice solicitation (telephone), Real-Time Market (RTM) prices, and/or broker quotes, to inform and conduct these transactions. Relevant information is included in Confidential Attachments A, J and M.

PG&E executed two bilateral park transactions and one bilateral storage transaction during the quarter to help balance its position. The details of these transactions are available in Attachment A.

- Voice and On-Line Brokers – Gas Financial Transactions

PG&E executes natural gas financial transactions (futures) through voice brokers that resulted in exchange-cleared trades. Brokers provide access to anonymous bids and offers from both over-the-counter parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled over-the-counter or cleared through NYMEX or ICE. The broker market trades the same financial products as the exchanges. Relevant information of transactions executed via voice brokers is included in Confidential Attachment A.

- Voice and On-Line Brokers – Commodity Purchases/Sales

PG&E executes physical gas supply transactions through voice brokers that resulted in transactions. Brokers provide access to anonymous bids and offers from both over-the-counter parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled over-the-counter or cleared through NGX. The broker market trades the same products as the bilateral market. Relevant information is included in Confidential Attachment A.

- Electronic Solicitations

Conducted via Instant Messaging and Telephone – PG&E conducts electronic solicitations for the purchase or sale of physical gas supply and financial products, with delivery terms ranging from a single day, to one month or longer, using instant messaging and telephone. In this way, PG&E is able to obtain robust price quotes from the marketplace, in real time, and may then execute with the counterparty with the best bid(s) or offer(s). Relevant information is included in Confidential Attachment A.

- Cashouts: Commodity Purchases/Sales

Cashouts are used by gas pipelines, according to their tariff, to cure certain imbalances between supply and demand. When a pipeline applies a cashout, it results in a commodity transaction. Relevant information is included in Confidential Attachment A.

**e) *GHG and Other Commodities***

- i. *For competitive solicitations, describe the process used to rank offers and select winning bid(s).*

None for the Quarter.

- ii. *For other transactional methods, provide the documentation supporting the selection of the chosen products.*

PG&E received its annual allocation of Electric Distribution Utility (EDU) Current Vintage allowances for the 2021 and 2022 years from the California Air Resources Board (CARB) in September 2020 and September 2021 respectively. All of the EDU allowances will be consigned into the 2021 and 2022 CARB Auctions as required by the regulations and consistent with PG&E's BPP. CARB and Québec's ministère du Développement durable, de l'Environnement et de la Lutte contre les changements climatiques held a joint allowance auction on August 18, 2021, for Current 2020 and 2021 Vintage and Advance 2024 Vintage allowances.

PG&E is authorized to procure GHG products through CARB Auctions and other CPUC-approved procurement processes and methods. PG&E provided information regarding its bilateral market procurement strategy to the PRG.

PG&E's procurement during the Quarter was consistent with PG&E's Conformed BPP GHG Procurement Plan filed in AL 5579-E, effective July 1, 2019.

All relevant GHG transactional information and supporting justification is included in Confidential Attachments E and L.

**4. Explanation/justification of the timing of the transactions.**

**a) *Electric Transactions***

When selecting electric transactions, the best-priced bids/offers are selected first (merit-order selection) among those available for the required products at the time of the transaction, subject to credit and other limitations and operational constraints. Detailed explanation/justification for the timing of the transactions is included in Confidential Attachment J.

***b) Natural Gas Transactions***

For daily physical gas transactions, timing of execution is primarily driven by the requirement to match fuel usage by utility-owned and contracted electric generating units and supply delivered on a daily and monthly basis, and by the availability of information impacting expectations for daily dispatch of these units. For transactions one month or longer, PG&E typically fills its forecast short gas positions in month-ahead, seasonal, or annual blocks, depending on the liquidity and prices available in each of these markets. Execution of term transactions was based on the PG&E Electric Portfolio Quarterly Position Update, presented to the PRG on June 15, 2021. Documentation supporting the timing of transactions is included in Confidential Attachment J.

**5. Discussion of the system load requirements/conditions underlying the need for the Quarter's transactions.**

***a) PG&E Participation in the CAISO Markets***

PG&E participates in the CAISO Day-Ahead and RTMs. PG&E's day-ahead planning and procurement incorporates weather-adjusted load forecasts, resource availability, price forecasts, dispatch costs and current bilateral electric market and forecasts of the CAISO's Integrated Forward Market (IFM) prices. The results of this process allow PG&E to determine the incremental costs of dispatchable resources that are bid into the IFM and the RTM. It also determines the price upon which PG&E is willing to pay the CAISO for meeting its hourly load. The CAISO then assures least cost dispatch by considering all resources simultaneously with all transmission constraints.

In the RTM, similar to the day-ahead market, PG&E submits resource bids and schedules into CAISO markets and those resources that clear the market will be obligated to operate in real time.

***b) PG&E-Owned Generation Conditions During Q3 2021***

PG&E received 89 percent of normal rainfall during the Quarter. Helms Pumped Storage Facility (Helms) was used throughout the Quarter as system

conditions and economics allowed. There were no planned outages at Helms during the Quarter lasting longer than 72 hours. There were no maintenance outages at Helms during the Quarter lasting longer than 72 hours. There were no forced outages at Helms during the Quarter lasting longer than 24 hours.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Drum 2 Unit 5 (49.5 MW) and Salt Springs Unit 2 (33 MW). In addition, there were three maintenance outages lasting longer than 72 hours at Butt Valley (41 MW), Drum 1 Unit 3 (13.1 MW), and Drum 1 Unit 4 (14.5 MW). Planned outages that carried over from the previous Quarter included: Bucks Unit 2 (32 MW), Caribou 1 Unit 1 (25 MW), and Pit 1 Unit 1 (30.5 MW).

Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW during the Quarter were incurred at the following facilities: Balch 2 Unit 3 (52.5 MW), Belden (125 MW), Bucks Creek Unit 1 (33 MW), Butt Valley (41 MW), Caribou 1 Unit 2 (25 MW), Caribou 1 Unit 3 (25 MW), Caribou 2 Unit 4 (60 MW), Caribou 2 Unit 5 (60 MW), Pit 5 Unit 4 (40 MW), and Poe Unit 1 (60 MW). Kings River (52 MW) and Pit 5 Unit 4 (40 MW) forced outages carried over from the previous Quarter.

Planned outages lasting longer than 72 hours at PG&E's fossil combined cycle facilities lasting longer than 72 hours included: Colusa Generating Station (657 MW), which carried over from the previous Quarter. There were no maintenance outages longer than 72 hours for the Quarter at PG&E's fossil combined cycle facilities. There were no forced outages greater than 24 hours during the Quarter at PG&E's fossil combined cycle facilities.

Planned outages lasting longer than 72 hours at PG&E's Humboldt Bay Generating Station included: Units 1 and 10 planned outages that carried over from the previous Quarter and Unit 10 planned outage. Maintenance outages lasting longer than 72 hours at PG&E's Humboldt Bay Generating Station included: Units

7, 8, 9 outages. There was a forced outage at Humboldt Bay Generating Station Unit 4 lasting longer than 24 hours during the Quarter.

During third Quarter 2021, Diablo Canyon Power Plant Unit 1 operated at 101.33 percent capacity factor. There were no generation impacting events occurring during the quarter for Unit 1. During third Quarter 2021, Diablo Canyon Power Plant Unit 2 operated at 100.52 percent capacity factor. There were no generation impacting events occurring during the quarter for Unit.

**6. Discussion of how the Quarter's transactions meet the goals of the risk management strategy reflected in the Plan.**

As described in Sections 3.b. and 3.d. above, during the Quarter, PG&E executed transactions in accordance with its Hedging Plan. A list of relevant information regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachments F and K.

**7. Copy of each contract.**

A list of transactional contracts executed and/or modified by PG&E during the Quarter is included in Confidential Attachment H. Copies of the contracts PG&E seeks approval of through this QCR are also included in this attachment.

**8. The valuation results for the contract(s) (for contracts of three months or greater duration).**

PG&E provides the valuation method and results for the contracts filed via this QCR in Confidential Attachment H.

**9. An electronic copy of any data or forecasts used to analyze the transactions.**

Because transaction personnel are continuously monitoring a wide range of market information on a 24-hour-per-day, 7-day-per-week basis, it is not feasible to provide all the data and forecasts used to analyze all potential and executed transactions. However, key analysis data utilized during the Quarter is in Confidential Attachment J.

**10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.**

To the extent any analyses requested by the Commission or PRG during the Quarter were not already included as a part of PG&E's response to Items 1 through 9 above, such additional analyses would be contained in Confidential Attachment F.

**11. Any other information sought by the Commission under the Pub. Util. Code.**

To the extent that the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) has requested information for the Quarter as identified in its MDR, this information will be included in PG&E's MDR response and submitted to the Cal Advocates 14 days after the filing of the QCR. In addition, the Commission's Energy Division has requested that PG&E provide transparent exchange traded prices. PG&E has included this information in Confidential Attachments A and E.

**D. Additional Reporting Requirement Pursuant to D.07-01-039**

As required by OP 12 of D.07-01-039, PG&E has included in Confidential Attachment I, investments in retained generation that were completed during the Quarter, as well as any multiple contracts of less than five years with the "same supplier, resource or facility" as required in D.07-01-039 on page 154. There were no transactions or investments to report during the Quarter.

**E. Cost Allocation Mechanism**

For the Quarter, PG&E executed four agreements for incremental capacity for electrical system reliability. PG&E submitted these transactions for approval on August 6, 2021 with Advice Letter 6289-E. In addition, PG&E executed an amendment to extend an existing agreement for incremental energy. PG&E submitted this transaction for approval on September 15 with Advice Letter 6323-E. These transactions are eligible for CAM cost recovery because it conforms to the parameters under D. 21-02-028 and D. 21-03-056. These transactions are detailed in Confidential Attachment H (Info Only Non-QF tab).

In addition, PG&E also executed five Resource Adequacy (RA) transactions, and one Import Allocation Rights transaction in compliance with D. 21-03-056 and are eligible for CAM cost recovery. These transactions are detailed in Confidential Attachment H (Info Only-Other tab). PG&E will submit these transactions for approval via Advice Letter Filing.

Advice 6387-E  
November 1, 2021

## **Attachment 2**

Attachment G-1 (Public Version)



# OCTOBER – DECEMBER 2021 RESOURCE ADEQUACY AND IMPORT ENERGY ELECTRONIC SOLICITATION INDEPENDENT EVALUATOR REPORT

PREPARED FOR PACIFIC GAS & ELECTRIC

**October 2021**

**Bringing Ingenuity to Life**  
paconsulting.com

**Denver Office**  
PA Consulting Group Inc.  
Suite 3550  
1700 Lincoln Street  
Denver  
CO 80203  
USA  
+1 720 566 9920

[paconsulting.com](http://paconsulting.com)

Cover photo: Frank Schulenberg

# INDEPENDENT EVALUATOR REPORT

PA Consulting Group, Inc. (PA) served as the Independent Evaluator for the Pacific Gas and Electric Company (PG&E) 2021 October-December Resource Adequacy and Import Energy Electronic Solicitation (2021 Oct-Dec RA and Import Energy Electronic Solicitation or the E-Solicitation). This report provides a summary of PA's evaluation of the process from the drafting of the E-Solicitation documents through to the recommendation of selected bids and negotiations of contracts submitted to the California Public Utilities Commission (CPUC or Commission).

## Overview of the E-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 October through December 2021 delivery periods; and for Local RA PG&E noted that it would also consider offers to sell PG&E Local RA for 2022 deliveries. PG&E also sought bids to purchase (i.e., **PG&E sells**) for Import Allocation Rights (IAR) monthly products for the October through December 2021 delivery periods. PG&E sought offers for sale (i.e., **PG&E buys**) of WSPP Schedule C Import Energy (IE) for the October through December 2021 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 ID	Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
1	System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Oct-Dec 2021	Fixed Price \$/kW-month
2	Local RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Oct-Dec 2021*	Fixed Price \$/kW-month
3	Import Allocation Rights	Sell	1 MW	Oct-Dec 2021	Fixed Price \$/kW-month
4	Import Energy	Buy	5 MW	Oct-Dec 2021	CAISO LMP, ICE Index, or Fixed Price \$/MWh

\* PG&E also indicated that it would consider proposals to sell Local RA to PG&E for 2022

PG&E received [REDACTED] to the E-Solicitation and contracted for [REDACTED]. PG&E received [REDACTED] IAR [REDACTED] to the E-Solicitation. PG&E received [REDACTED] IE [REDACTED] to the E-Solicitation and contracted for [REDACTED].



## Main Independent Evaluator Activities During the E-solicitation

PA's role in PG&E's 2021 Oct-Dec RA and Import Energy Electronic Solicitation spanned approximately three months in July through September 2021. PA performed the role of Independent Evaluator and was involved from PG&E's development of the Market Notice materials through the submittal of the bids/offers and ultimately the execution of the  confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in its E-Solicitation and provided fair and equitable treatment of all bids/offers. 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. The following provides a summary of PA's main activities during this solicitation:

- PA reviewed the E-Solicitation's Market Notice prior to PG&E's issuance and had no substantial comments or suggested edits to the Notice. PG&E has continually refined its development of a straightforward Market Notice template.
- PA received all communications between PG&E and bidders. PA directly received all the emails, including bids/offers that were sent to and received from bidders.
- PA reviewed the bids/offers received and negotiation emails with all bidders.
- PA reviewed the draft and executed confirmation documents related to the selected bids/offers.
- PA participated in communications with the PG&E team to discuss specific offers and PG&E's treatment of them.

## Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices to PG&E's RA E-Solicitation distribution list of approximately 530 email addresses. PG&E has conducted multiple RA and related solicitations in the last several years and has continually added to its E-Solicitation distribution list. PA believes that PG&E extended adequate outreach for the 2021 Oct-Dec RA and Import Energy E-Solicitation.

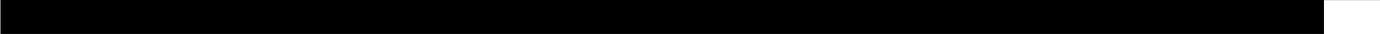
## PG&E's Bid Evaluation Methodology

PG&E primarily relied on a quantitative evaluation of each bidder's proposed volumes of RA desired and the bidders' proposed price for each product. Had competing bidders made bids/offers for RA in the same month that exceeded PG&E's available RA or need for RA in that month, PG&E would have selected the higher priced bidder.

## PG&E's Shortlisting and Negotiations of Confirms

The Market Notice for this E-Solicitation specified that PG&E would only contract for RA and IAR products with participants under an EEI Master Agreement. PG&E provided participants its Standard EEI RA Confirm and Import Allocation Rights Confirm. During the confirm negotiations, PG&E provided draft Confirms to each participant specific to their awarded price and volume. The Market Notice also specified that Import Energy offers should be for WSPP Schedule C firm energy.

As noted, PG&E received 



Ultimately, PG&E contracted through this E-Solicitation

## Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2021 Oct-Dec RA and Import Energy Electronic 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 this E-Solicitation was adequate and that the Market Notice materials were clear and concise related to the E-Solicitation.
- PA notes that PG&E has developed increasingly smooth RA and IAR E-Solicitations. While many bidders have recently contracted with PG&E; there also have been an increasing number of new counterparties to PG&E's RA procurements, requiring the negotiation and execution of EEI Master Agreements and transaction specific Confirmation Agreements. For this E-Solicitation, all transactions were executed with counterparties who already had executed EEI Master Agreements.
- Based on our review of PG&E's analysis, our participation in bidder communications and other IE activities, PA finds that PG&E conducted the 2021 Oct-Dec RA and Import Energy Electronic Solicitation fairly.



**Denver Office**

PA Consulting Group Inc.  
Suite 3550  
1700 Lincoln Street  
Denver  
CO 80203  
USA  
+1 720 566 9920

**All Rights Reserved**  
© PA Knowledge Limited 2020

**[paconsulting.com](http://paconsulting.com)**

Advice 6387-E  
November 1, 2021

## **Attachment 3**

Attachment G-2 (Public Version)



## Memo Report

<b>Subject</b>	2022 ANNUAL RESOURCE ADEQUACY AND IMPORT ENERGY ELECTRONIC SOLICITATION
<b>To</b>	Pacific Gas & Electric
<b>From</b>	Charles Janecek and Lillianne Farih
<b>Date</b>	October 20, 2021

PA Consulting Group, Inc. (PA) is serving as the Independent Evaluator (IE) for the Pacific Gas & Electric (PG&E) 2022 Annual Resource Adequacy and Import Energy Electronic Solicitation (2022 Annual RA and Import Energy E-Solicitation or the Solicitation). This memo report provides a summary of PA's evaluation of Phase I of the Solicitation from the drafting of the Solicitation documents through the recommendation of the selected bids and negotiations of the confirms that were ultimately executed.

### Overview of the Solicitation

The Solicitation was conducted in two Phases. Phase I was intended to address market needs after the release of the Initial 2022 Year-Ahead RA allocations and NQC lists; Phase II is intended to finalize procurement upon release of the final NQC list and RA allocations.

In developing PG&E's RA positions prior to the 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]. To help address this, PG&E has entertained non-conforming bids and offers for RA. Non-conforming bids and offers were those that were specified in the transmittal email of a bidder's submittal but were a resource specific bid not offered in the Solicitation or were unable to conform to the mutually exclusive constraints incorporated into PG&E's required bid forms. PG&E notified the IE of this strategy and was clear that non-conforming bids and offers were only considered after the initial bids and offers had been evaluated via PG&E's evaluation modeling and had been either shortlisted or rejected. In this manner, PG&E maintained the integrity of the evaluation by evaluating conforming bids and offers first, and only after conforming bids and offers were addressed were non-conforming bids and offers evaluated.

Phase I activities have concluded, with PG&E executing transactions with [REDACTED]

[REDACTED] Phase II of the solicitation was launched on September 23, 2021 with bids due October 5, 2021. PG&E is currently evaluating bids received to the Phase II solicitation.

### IE Activities During the Solicitation

PA's role in the Solicitation has been one of continuous involvement from August 2021 through the transaction executions in September and October 2021. PA performed the role of IE beginning with a review of PG&E's Market Notice and Solicitation materials and continuing through the bid evaluation and

shortlisting, RA Confirm negotiations, and final execution of Confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in the Solicitation protocol documents and provided fair and equitable treatment of all bids.

A complete description of all IE activities conducted during the Solicitation will be included in the final Independent Evaluator report upon conclusion of the Phase II activities.

## Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices via email PG&E's e-Solicitation RA list. PA is aware that many entities are currently engaged in RA solicitations and understands that most, if not all, market participants with RA obligations were aware of PG&E's Solicitation. PG&E understood its RA positions clearly and made attempts to cast a wide net to seek counterparties for both sales and purchases of RA during this phase of the Solicitation. PA believes that PG&E extended adequate outreach for Phase I of the 2022 Annual RA and Import Energy E-Solicitation.

## PG&E's Bid Evaluation Methodology

In this Solicitation, the bid evaluations were necessarily complex, as PG&E was evaluating offers for the purchase, sale, and swaps of similar RA volumes from multiple counterparties. PG&E relied upon its internally developed bid optimization model, which sought to optimize value for PG&E ratepayers across all bids. While PA did not conduct a detailed evaluation of each bid and its value to PG&E relative to other bids, PA did conduct reconciliation checks of the initial bids vs. the shortlisted bids compared to the original bids and found PG&E's bid evaluation methodology appropriate for this Solicitation.

## PG&E's Shortlisting and Negotiations of Confirm

PG&E received over [REDACTED] individual monthly bids/offers in response to the Solicitation, and ultimately shortlisted [REDACTED] counterparties.

The Market Notice for this E-Solicitation had specified that PG&E would only contract with bidders under an EEI Master Agreement and provided a standard RA Confirmation Agreement. During the confirm negotiations, PG&E provided draft Confirms to the bidder specific to the bidder's credit terms and that bidders' bid price and RA products. The 2022 Solicitation required no EEI negotiations as all transacting counterparties already have an executed EEI Master Agreement, though one counterparty had begun EEI negotiations with a different PG&E department prior to the launch of the solicitation.

## Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable Phase I 2022 Annual RA and Import Energy E-Solicitation.

PA's 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 this Solicitation was adequate and that the Market Notice materials were clear and concise related to the Solicitation.
- 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 Phase I of the 2022 Annual RA and Import Energy E-Solicitation.

Advice 6387-E  
November 1, 2021

## **Attachment 4**

Attachment H (Public Version)

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q3 2021**

**New Contracts Executed During the Quarter**

The table below provides a summary of Request for Offer (RFO) and Competitive Solicitation contracts executed during this Quarter and filed for CPUC approval via this Procurement Transaction Quarterly Compliance Report (QCR) advice letter. A copy of the contract(s) is included. Workpapers providing the method for valuation results calculations are included in Confidential Attachment L - Reasonable Number of Analyses Models, Description of Models, and How Models Operate.

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Local Area</b>	<b>Term</b>	<b>Volume (MW)</b>	<b>Price (kW- mo)</b>	<b>Notional Value (\$)</b>	<b>Confirm File Name</b>
None for the Quarter								

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q3 2021**

**New Contracts Executed During the Quarter**

The table below provides a summary of e-solicitation and/or Market RFP contracts executed through competitive processes during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name	
EDF Trading North America, LLC (33B200T06)	7/16/2021	Local RA (Sale)	[REDACTED]		6	[REDACTED]	[REDACTED]	Q3 2021 Market RFP	
		Local RA (Sale)			2				
		Local RA (Sale)			1				
EDF Trading North America, LLC (33B200T08)	8/4/2021	Local RA (Sale)			6			Q3 2021 Market RFP	
EDF Trading North America, LLC (33B200T09)	8/4/2021	Local RA (Purchase)			6			Q3 2021 Market RFP	
The Energy Authority, Inc. (33B234T01)	8/10/2021	System, Flexible RA (Purchase)			N/A			4	Q3 2021 E- Solicitation
Silicon Valley Clean Energy Authority (33B230T03)	8/12/2021	Local RA (Sale)			6			Q3 2021 E- Solicitation	
					6				
Silicon Valley Clean Energy Authority (33B230T04)	8/12/2021	Local RA (Purchase)			6			Q3 2021 E- Solicitation	
					6				
Southern California Edison Company (33B217U02)	8/18/2021	System RA (Sale)			N/A			244.58	Q3 2021 Market RFP
								243.64	
								226.77	
Southern California Edison Company (33B217U03)	8/18/2021	Local RA (Purchase)	[REDACTED]	241	Q3 2021 Market RFP				
				241					
				224.13					
				3.58					
				2.64					
				2.64					
				258.65					

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
Southern California Edison Company (33B217U04)	8/18/2021	Local RA (Purchase)			248.56			Q3 2021 Market RFP
					220.63			
					150.98			
					150.98			
					146			
					205			
					205			
Exelon Generation Company, LLC (33B251T10)	9/14/2021	Local RA (Purchase)			12			Q3 2021 E- Solicitation
					12			
					8			
		Local, Flexible RA (Purchase)			3			
					16			
					16			
3 Phases Renewables, Inc. (33B113T04)	9/16/2021	Local, Flexible RA (Purchase)			6.9			Q3 2021 E- Solicitation
					6.9			
City of San Jose (San Jose Clean Energy) (33B247U01)	9/20/2021	System RA (Sale)	N/A		25			Q3 2021 E- Solicitation
					25			
Marin Clean Energy (33B235U07)	9/20/2021	System RA (Sale)	N/A		60			Q3 2021 E- Solicitation
Calpine Energy Services, L.P. (33B029U05)	9/20/2021	Local, Flexible RA (Purchase)			1			Q3 2021 E- Solicitation
					1			
					1			
					1			
					1			
					2			
					2			
					3			
					1			
					1			
					1			
Calpine Energy		Local, Flexible RA			1			Q3 2021 E- Solicitation
					1			
					1			
					1			
					1			
					1			
					1			

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
Services, L.P. (33B029U06)	9/20/2021	(Sale)			1			Generation
					2			
					1			
					1			
					1			
					1			
		Local RA (Sale)			1			
			1					
Elk Hills Power LLC (33B267U01)	9/21/2021	System RA (Purchase)	N/A		10			Q3 2021 E- Solicitation
					10			
CCSF, acting by and thru its PUC, CleanPowerSF (33B243U02)	9/21/2021	System, Flexible RA (Sale)	N/A		23			Q3 2021 E- Solicitation
					87			
Silicon Valley Clean Energy Authority (33B230U02)	9/21/2021	System RA (Sale)	N/A		26.22			Q3 2021 E- Solicitation
Commercial Energy of Montana Inc. (33B202U01)	9/22/2021	System, Flexible RA (Sale)	N/A		2			Q3 2021 E- Solicitation
					5			
					3			
					5			
					10			
Pioneer Community Energy (33B245U02)	9/23/2021	System RA (Sale)	N/A		125			Q3 2021 E- Solicitation
Peninsula Clean Energy Authority (33B232U03)	9/24/2021	Local RA (Purchase)			19			Q3 2021 E- Solicitation
					19			
					19			
Peninsula Clean Energy Authority (33B232U04)	9/24/2021	Local RA (Purchase)			8			Q3 2021 E- Solicitation
					8			
					8			
					9			
					2			
		Local, Flexible RA (Purchase)			11			
	4							

**Confidential Attachment H  
Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Q3 2021**

**New Contracts Executed During the Quarter**

The table below provides a summary of bilateral contracts (including GHG offset transactions facilitated by brokers), and significant exchange-placed trades, (including RA transactions facilitated by brokers) executed during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW-day)	Notional Value (\$)	Confirm File Name
Elk Hills Power LLC (33B267T02) <sup>1</sup>	7/14/2021	System RA (Purchase)	N/A		14			Q3 2021 Bilateral
					28			
Southern California Edison Company (33B217T19)	7/15/2021	System, Flexible RA (Sale)	N/A		191.68			Q3 2021 Bilateral
		Local, Flexible RA (Sale)			110.3			
		System RA (Sale)	N/A		233.02			
					165			
Southern California Edison Company (33B217T20)	7/15/2021	Local, Flexible RA (Purchase)			301.98			Q3 2021 Bilateral
		Local RA (Purchase)			233.02			
		Local RA (Purchase)			165			
Silicon Valley Clean Energy Authority (33B230T05)	8/12/2021	Local RA (Sale)			6			Q3 2021 Bilateral
Silicon Valley Clean Energy Authority (33B230T06)	8/12/2021	Local RA (Purchase)			6			Q3 2021 Bilateral
Southern California Edison Company (33B217T21)	8/16/2021	Local, Flexible RA (Purchase)			217			Q3 2021 Bilateral
Southern California Edison Company (33B217T22)	8/16/2021	System, Flexible RA (Sale)	N/A		217			Q3 2021 Bilateral
Southern California Edison Company (33B217T23)	9/10/2021	System RA (Sale)	N/A		81.02			Q3 2021 Bilateral
					57.02			
		System, Flexible RA	N/A		320.98			
		320.98						
Southern California Edison Company (33B217T24)	9/10/2021	Local RA (Purchase)			81.02			Q3 2021 Bilateral
		Local, Flexible RA (Purchase)			57.02			
					320.98			

<sup>1</sup> Partial MWs from this transaction will be submitted for Advice Letter approval. See Info Only-Other tab.

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q3 2021**

**New Contracts Executed/Contracts Amended During the Quarter**

Informational purposes only: A summary of the contracts executed during the Quarter to be approved via an Advice Letter Filing. For further details, please see PG&E's Q3 2021 QCR Public Narrative.

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Type of Transaction</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
Clean Power Alliance of Southern California (33B240T06)	7/12/2021	Import Allocation Rights	N/A	Contract	N/A	Advice Letter pending
Elk Hills Power LLC (33B267T02) <sup>1</sup>	7/14/2021	System RA	N/A	Contract	N/A	Advice Letter pending
Conoco Phillips Company (33B249T03)	7/15/2021	System RA	N/A	Contract	N/A	Advice Letter pending
Valley Electric Association, Inc. (33B269T01)	7/16/2021	System RA	N/A	Contract	N/A	Advice Letter pending
EDF Trading North America, LLC (33B200T07)	7/16/2021	System and Local RA	N/A	Contract	N/A	Advice Letter pending
Dynegy Marketing and Trade, LLC (33B263T03)	7/29/2021	Local, Flexible RA	N/A	Contract	N/A	Advice Letter pending

<sup>1</sup> Partial MWs from this transaction will be submitted through QCR. See Bilat-Broker tab.

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q3 2021**

**New Contracts Executed/Contracts Amended During the Quarter**

**Informational purposes only:** In accordance with PG&E’s CPUC approved BPP, below is a summary of QF contracts executed and/or amended during the Quarter filed via separate application, advice letter or other approval mechanisms:

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Type of Transaction</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
None for the Quarter						

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q3 2021**

**New Contracts Executed/Contracts Amended During the Quarter**

**Informational purposes only:** In accordance with PG&E's CPUC approved BPP, below is a summary of contracts

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Contract</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
Kings River Syphon (33R509RM)	7/2/2021	ReMAT	20 years	Contract	N/A	2021 ERR Compliance Filing
Fishwater Release (33R510RM)	7/2/2021	ReMAT	20 years	Contract	N/A	2021 ERR Compliance Filing
Hummingbird Energy Storage, LLC (40S014)	7/6/2021	Energy Storage	N/A	Non-Routine Amendment to Existing Agreement	8/10/2021	Advice Letter 6292-E
Woodland Biomass (33R493)	7/7/2021	RPS	N/A	Non-Routine Amendment to Existing Agreement	7/16/2021	Advice Letter 6262-E
Ponderosa Daley Hydroelectric Project (22R511RMA)	7/15/2021	ReMAT	20 years	Contract	N/A	2021 ERR Compliance Filing
Arlington Energy Center III (40S031)	7/16/2021	Energy Storage	15 years	Contract	8/6/2021	Advice Letter 6289-E
Pomona Energy Storage 2 LLC (40S028)	7/16/2021	Energy Storage	10 years	Contract	8/6/2021	Advice Letter 6289-E
Dynegy Marketing and Trade, LLC (40S019)	7/21/2021	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2021 ERR Compliance Filing
Gateway Energy Storage, LLC (40S020)	7/28/2021	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2021 ERR Compliance Filing
Arlington Energy Center III (40S030)	7/30/2021	Energy Storage	15 years	Contract	8/6/2021	Advice Letter 6289-E
Sonoran West Holdings 2 (40S029)	7/30/2021	Energy Storage	15 years	Contract	8/6/2021	Advice Letter 6289-E
SPI Biomass Portfolio (33R254)	8/2/2021	RPS	N/A	Letter Agreement	N/A	2021 ERR Compliance Filing
Blythe Energy Storage 110, LLC (40S021)	8/11/2021	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2021 ERR Compliance Filing

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
Calpine Russell City Energy Center (33B075)	8/26/2021	Tolling	N/A	Routine Amendment to Existing Agreement	N/A	2021 ERRR Compliance Filing
Sonoran West Holdings 2 (40S029)	8/30/2021	Energy Storage	N/A	Consent to Assignment - Financing	N/A	2021 ERRR Compliance Filing
Tesoro Refining and Marketing Company LLC (33B221)	9/9/2021	Conventional	N/A	Non-Routine Amendment to Existing Agreement	9/10/2021	Advice Letter 6322-E
Tesoro Refining and Marketing Company LLC (33B221)	9/10/2021	Conventional	N/A	Extension Agreement	9/15/2021	Advice Letter 6323-E
Cascade Energy Storage (40S009)	9/15/2021	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2021 ERRR Compliance Filing
Murphys Powerhouse (33R513RM)	9/17/2021	ReMAT	20 years	Contract	N/A	2021 ERRR Compliance Filing
Silicon Valley Clean Energy Authority (33R516)	9/20/2021	RPS Energy REC Sales	1 year	Contract	10/19/2021	Advice Letter 6371-E
East Bay Community Energy Authority (33R515)	9/20/2021	RPS Energy REC Sales	1 year	Contract	10/19/2021	Advice Letter 6371-E
Camptonville Biopower 1 (33R512BIO)	9/22/2021	BioMAT	20 years	Contract	N/A	2021 ERRR Compliance Filing
Orange County Power Authority (33B271)	9/23/2021	EEI Master	N/A	Contract	N/A	2021 ERRR Compliance Filing
Cascade Energy Storage, LLC (33B270)	9/27/2021	EEI Master	N/A	Contract	N/A	2021 ERRR Compliance Filing
Clean Energy Alliance (33B272)	9/28/2021	EEI Master	N/A	Contract	N/A	2021 ERRR Compliance Filing
Engeman SVRC Energy (33R514BIO)	9/28/2021	BioMAT	20 years	Contract	N/A	2021 ERRR Compliance Filing
	9/14/2021			Contract	N/A	TBD
	9/14/2021			Contract	N/A	TBD
	9/14/2021			Contract	N/A	TBD
	9/14/2021			Contract	N/A	TBD

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
Contract	N/A	TBD				

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
	9/15/2021			Contract	N/A	TBD
	9/15/2021			Contract	N/A	TBD
	9/15/2021			Contract	N/A	TBD
	9/15/2021			Contract	N/A	TBD
	9/15/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD



Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
9/16/2021	Contract	N/A	TBD			

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
	9/16/2021			Contract	N/A	TBD
	9/16/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
	9/17/2021			Contract	N/A	TBD
9/20/2021	Contract	N/A	TBD			

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
				Contract	N/A	TBD
Contract	N/A	TBD				

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Contract</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
	9/20/2021			Contract	N/A	TBD
	9/20/2021			Contract	N/A	TBD
	9/20/2021			Contract	N/A	TBD
	9/20/2021			Contract	N/A	TBD
	9/20/2021			Contract	N/A	TBD
	9/20/2021			Contract	N/A	TBD

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q3 2021**

**Expired and Terminated Contracts During the Quarter**

**Informational purposes only:** In accordance with PG&E's CPUC approved BPP, below is a summary of the contracts terminated/expired during the Quarter:

<b>Contract/ Counterparty Name</b>	<b>Termination or Expiration <sup>1</sup></b>	<b>Date</b>	<b>Product</b>	<b>Volume (MW)</b>
Mahal PV (33R425)	Termination	7/9/2021	GTSR - Regional Renewable Choice	1.656
Deadwood Creek (12H010QPA)	Expiration	7/31/2021	PURPA	2
Stanford Energy Group (01C089)	Termination	9/7/2021	QF	0.115

---

<sup>1</sup> A terminated contract is ended before its original expiration date. An expiration date is the nature end of the contract.

Advice 6387-E  
November 1, 2021

## **Attachment 5**

Confidentiality Declarations and Matrix

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

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

**DECLARATION OF JAY BUKOWSKI  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S  
CONFIDENTIAL ATTACHMENTS F AND K**

I, Jay Bukowski, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since October 1998. My current title is Manager within PG&E's Energy Policy and Procurement organization. In this position, my responsibilities include review of regulatory reports and managing PG&E's Procurement Review Group and Independent Evaluator program. 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 November 1, 2021 Advice Letter 6387-E, Confidential Attachments F and 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 November 1, 2021, at San Francisco, California.

/s/

---

Jay Bukowski

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

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

**DECLARATION OF JOHN ULLOA  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND INFORMATION  
CONTAINED IN CONFIDENTIAL ATTACHMENTS A, B, D, J AND L**

I, John Ulloa, declare:

1. I am presently employed by Pacific Gas and Electric Company (“PG&E”) and have been an employee since 1998. My current title is Manager, Electric Gas Supply in the Electric and Gas Acquisition Department, which is part of the Energy Policy and Procurement organization. I am responsible for physical and financial trading of gas in support of PG&E’s utility-owned generation plants and PG&E’s tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved. 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 November 1, 2021 Advice Letter 6387-E, Confidential Attachments A, B, D, J, and L.

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 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 November 1, 2021, at San Francisco, California.

*/s/*  
\_\_\_\_\_  
John Ulloa

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

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

**DECLARATION OF MARIANNE AIKAWA  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND  
INFORMATION CONTAINED IN  
CONFIDENTIAL ATTACHMENTS A, B, C, E, G, H, J, L, AND M**

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 Senior Manager 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 November 1, 2021 Advice Letter 6387-E, Confidential Attachments A, B, C, E, G, H, J, L and M.
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 November 1, 2021, at San Francisco, California.

\_\_\_\_\_  
/s/  
Marianne Aikawa

**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, Kelly Everidge, am the Director of Risk, Compliance and Reporting of Pacific Gas and Electric Company (“PG&E”), a California corporation. Fong Wan, the Senior Vice President of 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, B5Q  
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.  
Name or Docket No. of CPUC Proceeding (if applicable): Quarter 3, 2021 Quarterly Compliance Report (Advice Letter 6387-E).
3. Title and description of document(s):  
Q3 2021 Quarterly Compliance Report (QCR), Confidential Attachment H, Info Only Non-QF tab, which lists contracts executed during the quarter.
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 with further detail provided in Appendix A, which is incorporated into this declaration:

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 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>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical 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 and/or General Order 66-D (“The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; <b>and</b> (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input checked="" 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>	<p>Confidential Attachment H excel file, Info Only Non-QF tab, rows 38-159</p>
<input type="checkbox"/>	<p>Corporate financial records.</p> <p>(Protected under Govt. Code §§ 6254(k), 6254.15)</p>	

<input type="checkbox"/>	<p>Third-Party information subject to non-disclosure or confidentiality agreements or obligations.</p> <p>(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)</p>	
<input checked="" type="checkbox"/>	<p>Other categories where disclosure would be against the public interest (Govt. Code § 6255(a)):</p> <p>This compliance showing contains commercially sensitive information detailing the transactions PG&amp;E executed during the Quarter. Disclosure of the specific contract information could potentially have an adverse effect on the market.</p>	<p>Confidential Attachment H excel file, Info Only Non-QF tab, rows 38-159</p>

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 1st day of November, 2021 at San Francisco, California.


---

 Kelly Everidge  
 Director, Risk, Compliance and Reporting  
 Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

QUARTER 3, 2021 QUARTERLY COMPLIANCE PROCUREMENT REPORT  
 ATTACHMENT TO DECLARATION  
 NOVEMBER 1, 2021

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
Confid_Attachment_H_Q3_2021.xlsx	New Contracts Executed/Contracts Amended during the Quarter	Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.  Other categories where disclosure would be against the public interest (Govt. Code § 6255(a))	Q3 2021 QCR, Confidential Attachment H folder, Confidential Attachment H excel file, Info Only Non-QF tab, rows 38-159

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

Redaction Reference	D.14-10-033, GHG Confidential Information Matrix (As corrected by D. 15-01-024)	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
<b>Document: Quarterly Compliance Report</b>			
Confidential Attachment E, Q3 2021 GHG Materials folder:  File name: 04_2021 Q3_Offset Procurement Strategy_Electric.docx  File name: 06_PGE PRG PRES GHG Position Upd_092221.pdf, "Market Data Review, GHG Dispatch Curve", page 4	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite
Confidential Attachment F, Confid Attachment F Qtr03 2021 zip file:  File name: PGE PRG PRES GHG Position Update_092221.pdf, "Market Data Review, GHG Dispatch Curve", page 4  Confidential Attachment F, Confid Attachment F, PRG Meeting Materials and Summaries, September 22, 2021 folder:  File name: PGE PRG PRES GHG Position Update_092221.pdf, "Market Data Review, GHG Dispatch Curve", page 4	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment A – Physical and Financial Electric Transactions	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 years
Attachment A – Physical and Financial Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (Electric and Natural Gas Transactions, Carbon Free Transactions)	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
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (GHG Transactions)	D.14-10-033  Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.  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.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment C – in its entirety: Electric Transactions	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
Attachment D – in its entirety: Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment E – in its entirety: Other Transactions (Electric Information) (Except Greenhouse Gas (“GHG”) Information, which is presented separately below)	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)  Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;  Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of information in these executed contracts could provide market participants regarding PG&E’s net open position.  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.	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.
Attachment E – in its entirety: Other Transactions- (GHG Information)	D.14-10-033  Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.  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.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment F –in its entirety: PRG Material	D.06-06-066 and Public Utilities Code Section 454.5(g)	<p>Presentations to the PRG include a variety of confidential commercially market sensitive information, including information about e-solicitation, bilateral contracts, pricing information, strategy discussions, recently issued RFO's, etc.</p> <p>Release of this commercially market sensitive information could impact market prices, cause harm to PG&amp;E's customers, and put PG&amp;E at an unfair business disadvantage by the disclosing this information. This information could be used by other market participants to gain a commercial advantage.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Length of Time for Specific Items identified in D.06-06-066 Matrix or Indefinite (for GHG information)
Attachment F –in its entirety: PRG Material-GHG Information	D.14-10-033	<p>Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment G - Independent Evaluator (IE) Reports	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.	3 Years
	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids	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.	3 Years
Attachment H - Executed Contracts	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)  Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;  Item VIII ) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of information in these executed contracts could provide market participants regarding PG&E's net open position.  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.	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.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment H - Executed Contracts – GHG Information	D.14-10-033  Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.  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.	Indefinite
Attachment J – System Conditions	Item VI E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	Residual net short/long is key input to PG&E's confidential forecast of net open position. The residual net short/long is information provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Public Utilities Code Section 454.5(g)	In addition, this attachment contains market sensitive information and addresses PG&E's energy procurement trading strategies.	Indefinite
Attachment J - Natural Gas Transaction Documents	Item I) A) 3) Gas Demand Forecasts and 4) Long-term fuel (gas) buying and hedging plans	This information includes detailed information on PG&E's implementation of its fuel buying and hedging plans and must remain confidential to avoid disclosing PG&E's market strategy.	Physical gas information is confidential for 3 years; Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment K – Risk Management	Item XII – Monthly Portfolio Risk Assessment of Appendix 1 of D.06-06-066 for three years.	Value at Risk (VaR) or electric and gas for electric generation is deemed confidential the matrix. Public disclosure of TeVaR results would be detrimental for PG&E and its electric customers. Such disclosure would release confidential, sensitive market intelligence that would place PG&E at an unfair disadvantage in the energy and financial markets.	3 years
	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
Attachment L – In its entirety: Reasonable Number of Analyses	Item I) A) 4) Long-term fuel (gas) buying and hedging plans,	This information includes detailed information on PG&E's hedging plan, and must remain confidential to avoid disclosing PG&E's market strategy.	Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Public Utilities Code 454.5(g)	Information concerning a description of PG&E's long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage if publicly disclosed.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**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
<b>Document: Quarterly Compliance Report</b>			
Attachment L - Reasonable Number of Analyses – Electric	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve details which would reveal PG&E's position in the marketplace.	3 Years
	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	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.	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.
	VIII ) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids		
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XI) Monthly Procurement Costs (Energy Resource Recover Accounts [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation.	Monthly procurement costs (ERRA Filings) are confidential for 3 years
	D-14-10-033	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6387-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2021  
 NOVEMBER 1, 2021**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time Date To Be Kept Confidential</b>
<b>Document: Quarterly Compliance Report</b>			
Attachment M – Executed Contracts	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	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.	3 Years

**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  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy

Sun Light & Power  
Sunshine Design  
Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

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