



**Sidney Bob Dietz II**  
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November 1, 2021

**Advice 4522-G/6389-E**

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: PG&E's 2022 Base Revenue Requirements Effective January 1, 2022**

**Purpose**

Pacific Gas and Electric Company (PG&E or the Company) submits this Tier 1 advice letter updating its 2022 base revenue requirements effective January 1, 2022, as approved by the California Public Utilities Commission (Commission or CPUC) for the following items:

<b>Amounts in Thousands</b>				
<b><u>Line No.</u></b>	<b><u>Revenue Requirements (\$000s)</u></b>	<b><u>2022 GRC</u></b>	<b><u>2022 Pension<sup>1</sup></u></b>	<b><u>Total</u></b>
1	Electric Distribution	\$5,179,769	\$40,709	\$5,220,478
2	Gas Distribution	\$2,198,562	\$23,675	\$2,222,237
3	Electric Generation	\$2,262,528	\$26,520	\$2,289,048
4	Total	\$9,640,859	\$90,904	\$9,731,762

Note: Some totals may not add precisely due to rounding.

[1] The 2022 Pension revenue requirement reflected above remains unchanged from 2021. As approved in Advice 3915-G/5195-E on January 8, 2018, the data to calculate the annual pension revenue requirement is not available until after the first of the year. Once available, PG&E will file an advice letter to update the 2022 pension revenue requirement. The base revenue requirements table will also be updated at that time to reflect the 2022 Pension revenue requirement.

Attachment 1 includes the Rolling Revenue Requirement Report updated for these 2022 base revenue requirements.

## **Background**

### **2020 General Rate Case**

On December 13, 2018 PG&E filed its 2020 General Rate Case Application (A.18-12-009), including proposed electric and gas distribution and electric generation revenue requirements. On December 20, 2019, PG&E filed a joint settlement in PG&E's 2020-2022 GRC, Joint Motion of the Public Advocates Office, The Utility Reform Network, Small Business Utility Advocates, Center for Accessible Technology, The National Diversity Coalition, Coalition of California Utility Employees, California City County Street Light Association, The Office of the Safety Advocate and Pacific Gas and Electric Company. On December 11, 2020, the Commission issued a Final Decision (D.20-12-005) in PG&E's 2020 GRC. Those revenue requirements are reflected in Attachment 1 of this advice letter - *Adopted Rolling Revenue Requirements Report*.

### **Revenue, Fees and Uncollectibles Expense**

Decision 20-12-005, adopted PG&E's methodology to forecast the uncollectible factor to be revised annually by advice letter submittal using a 10 year rolling average based on updated historical data. On October 21, 2021, PG&E submitted Advice Letters 4512-G/6373-E, updating its 2022 Uncollectibles factor, using historical recorded data. The impact of the updated uncollectibles factor is reflected in Attachment 1 of this advice letter.

### **2020 Cost of Capital**

On December 20, 2019, the CPUC issued D.19-12-056, adopting PG&E's cost of capital for test year 2020. The Commission authorized PG&E's cost of long-term cost debt as 5.16% but recognized that the cost of debt could be different after PG&E's emergence from Chapter 11 bankruptcy. Issues specific to PG&E's bankruptcy were directed to the Commission proceeding related to PG&E's bankruptcy, Investigation (I.) 19-09-016. On June 1, 2020, the Commission issued D.20-05-053 in that proceeding, approving PG&E's Plan of Reorganization (POR) with conditions and modifications. In D.20-05-053, the Commission directed PG&E to update its cost of capital within 30 days of the Effective Date of the POR to reflect the debt cost savings associated with PG&E's POR.

In compliance with Ordering Paragraph (OP) 6 of PG&E's POR OII D. 20-05-053, on July 22, 2020, PG&E filed Advice Letter 4275-G/5887-E to update its cost of capital effective July 1, 2020. PG&E requested that its cost of long-term debt be updated from 5.16%, as previously authorized by D.19-12-056, to 4.17%. PG&E's overall return on rate base would be reduced from 7.81% to 7.34%. Advice Letter 4275-G/5887-E was approved as filed on August 20, 2020. The revenue requirements associated with the 2020 Cost of Capital Decision and update are reflected in Attachment 1 of this advice letter.

### **Excess Accumulated Deferred Income Taxes (ADIT)**

In D.20-12-005, the Commission directed PG&E to file an advice letter within 45 days of the effective date of that decision, or December 11, 2020, to reflect the return of excess ADIT created by the passage of the 2017 Tax Act, consistent with the methodology the Commission required in D.19-08-023, using the Average Rate Assumption Method. The excess ADIT balance was created when the 2017 Tax Act reduced PG&E's federal corporate income tax rate from 35 percent to 21 percent. As a result, a portion of existing ADIT (excess ADIT) is no longer needed to pay for future taxes. The return of excess ADIT to ratepayers using PG&E's methodology was included in the adopted revenue requirement calculations in D.20-12-005. On January 19, 2021, PG&E filed Advice Letter 4367-G/6062-E to adjust the return of excess ADIT in compliance with OP 12 of D.20-12-005. PG&E's Advice Letter 4367-G/6062-E was approved on April 5, 2021. PG&E has reflected the adjustment to its electric and gas distribution and electric generation revenue requirements for the return of excess ADIT in Attachment I of this advice letter.

### **Decision 18-04-014, Ex Parte Penalty**

Decision 18-04-014 adopted a settlement related to PG&E's failure to report ex parte communications in a timely manner. The decision adopted both non-financial and financial penalties. One of those penalties required PG&E to implement a one-time adjustment of \$10 million amortized in equivalent annual amounts for its next General Rate Case cycle. PG&E has reflected the \$10 million credit which will be given back in equal annual amounts of \$3.3 million starting in January 2020 through December 2022. The adjustment is reflected in Attachment 1.

### **Decision 19-12-013, Ex Parte Penalty Phase II**

On December 5, 2019, the Commission issued a Phase II Decision (D. 19-12-013) Granting the Joint Motion of the City of San Bruno, The City of San Carlos, The Public Advocates Office, The Safety Enforcement Division, The Utility Reform Network and Pacific Gas and Electric Company for Adoption of the Phase II Settlement Agreement.

The Settlement Agreement resolved the Commission's investigation into eight separate proceedings in which PG&E admittedly failed to timely report ex parte communications, and engaged in improper ex parte communications. The Decision also adopted the following financial penalty which is reflected in Attachment I of this advice letter:

***2.2.C General Rate Case Ratemaking Remedy - PG&E shall additionally forego collection of \$1,000,000 in revenue requirements in its 2020 General Rate Case ("GRC") cycle, with such amount to be reduced from the overall amount authorized by the Commission in its upcoming 2020 GRC decision. This remedy shall be implemented through PG&E's Annual Electric and Gas True-up Advice Letters, or such mechanisms***

*as may be agreed upon by the Parties. The amount above shall be allocated among and within customer classes in accordance with the applicable allocation and ratemaking methodologies then adopted by the Commission.*

### **Decision 19-10-010, Narrows Project Sale**

On April 18, 2019, PG&E filed Application (A.) 19-04-011 requesting that the CPUC authorize the sale by PG&E of the Narrows Project to the YCWA as set forth in the Purchase and Sale Agreement, dated September 21, 2018.

On October 10, 2019, the Commission adopted D.19-10-010, which authorized the sale of the Narrows Project to the YCWA, approved PG&E's proposed approach to ratemaking, and ordered PG&E to submit a Tier 1 advice letter within 45-days following closing to true-up the final financial and tax information related to the transaction. PG&E's advice letter 5825-E/E-A/E-B was approved on September 16, 2020. PG&E has reflected the reduction to its electric generation revenue requirement for the sale in Attachment I of this advice letter.

### **D. 20-09-027, Kern Project Sale**

On February 12, 2020, PG&E filed A. 20-02-005 requesting that the CPUC authorize the sale by PG&E of the Kern Project to Kern LLC as set forth in the Purchase and Sale Agreement, dated January 17, 2020.

On September 24, 2020, the Commission adopted D.20-09-027, which authorized the sale of the Kern Project to Kern LLC, approved PG&E's proposed ratemaking, and ordered PG&E to submit a Tier 1 advice letter within 45 days following closing of the sale to true-up the final financial and tax information related to the transaction. PG&E's Advice Letter 6083-E was approved on April 27, 2021. PG&E has reflected the reduction to its electric generation revenue requirement for the sale in Attachment I of this advice letter.

### **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:

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

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

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

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

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

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

### **Effective Date**

PG&E submits this advice letter as a Tier 1 submittal. PG&E requests that this advice letter become effective on January 1, 2022.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.15-09-001, I.15-11-015, A.19-04-015, A.20-02-005, and A.19-04-011. Address changes to the General Order 96-B service list should be directed to

PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

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/S/

Sidney Dietz  
Director, Regulatory Relations

**Attachments**

Attachment 1 - *Adopted Rolling Revenue Requirements Report*

cc: Service Lists for

A.18-12-009 – 2020 General Rate Case, Phase I

I.15-11-015 – Ex Parte Phase I

A.19-04-015 – Cost of Capital 2020

A.20-02-005 – Kern Sale

A.19-04-011 – Narrows Sale



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 M)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Annie Ho  
 Phone #: (415) 973-8794  
 E-mail: PGETariffs@pge.com  
 E-mail Disposition Notice to: AMHP@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) #: 4522-G/6389-E

Tier Designation: 1

Subject of AL: PG&E's 2022 Base Revenue Requirements Effective January 1, 2022

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

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:

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

Resolution required?  Yes  No

Requested effective date: 1/1/22

No. of tariff sheets: N/A

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 4522-G/6389-E  
November 1, 2021

## **Attachment 1**

### **Adopted Rolling Revenue Requirements Report**

## ATTACHMENT I

Adopted Rolling Revenue Requirements Report  
From 2020 GRC  
in thousands

	Electric Distribution	Electric Generation	Gas Distribution	Total	Decision(s)
2020 Adopted GRC RRQ	4,799,849	2,289,345	2,013,276	9,102,470	D.20-12-005, 2020 GRC Decision
2020 Revenue, Fees & Uncollectibles Expense Adjustment DOE Litigation Funds *	49	23 20,500	19	92 20,500	AL 4352-G/6038-E D.20-12-005, 2020 GRC Decision
Ex Parte Penalty	(1,729)	(881)	(724)	(3,333)	D.18-04-014
Ex Parte Penalty Phase II	(176)	(84)	(74)	(333)	D.19-12-013
2020 Pension	38,570	25,126	22,431	86,128	D.09-09-020/ AL 4357-G/6048-E
2020 Accumulated Deferred Tax Adjustment	(24,975)	(2,818)	2,836	(24,957)	D.20-12-005/AL 4367-G/6062-E
Cost of Capital/Cost of Debt					
2020 Cost of Capital Adjustment	18,798	5,863	7,876	32,538	D.19-12-056, CoC Decision
2020 Cost of Debt Adjustment	(40,091)	(12,559)	(16,871)	(69,520)	D.19-12-056, CoC Decision/AL 4275-G/5887-E
Hydroelectric Sale					
Narrows Sale - 2020 Reduction		(634)		(634)	D.19-10-010/AL 5825-E-B
<b>2020 Base Revenue Amount including Pension Adjustment (Eff. 1/1/20)</b>	<b>4,790,297</b>	<b>2,323,883</b>	<b>2,028,770</b>	<b>9,142,950</b>	
2021 Attrition	210,781	(15,531)	120,719	315,969	D.20-12-005, 2020 GRC Decision
2021 Revenue, Fees & Uncollectibles Expense Adjustment	(4)	27	(10)	13	AL 4353-G/6039-E
Pension					
Reverse 2020 Pension	(38,570)	(25,126)	(22,431)	(86,128)	D.09-09-020/ AL 4357-G/6048-E
2021 Pension	40,709	26,520	23,675	90,904	D.09-09-020/ AL 4411-G/6139-E
Accumulated Deferred Tax Adjustment					
Reverse 2020 Accumulated Deferred Tax Adjustment	24,975	2,818	(2,836)	24,957	D.20-12-005/AL 4367-G/6062-E
2021 Accumulated Deferred Tax Adjustment	(25,635)	(3,039)	2,507	(26,167)	D.20-12-005/AL 4367-G/6062-E
Cost of Capital					
Reverse 2020 Cost of Capital	(18,798)	(5,863)	(7,876)	(32,538)	D.19-12-056, CoC Decision
2021 Cost of Capital	21,216	5,690	8,665	35,571	D.19-12-056, CoC Decision/AL 4275-G/5887-E
Cost of Debt					
Reverse 2020 Cost of Debt Adjustment	40,091	12,559	16,871	69,520	D.19-12-056, CoC Decision/AL 4275-G/5887-E
2021 Cost of Debt Adjustment	(91,040)	(24,636)	(37,577)	(153,253)	D.19-12-056, CoC Decision/AL 4275-G/5887-E
Hydroelectric Sales					
Reverse Narrows Sale - 2020 Reduction		634		634	D.19-10-010/AL 5825-E-B
Narrows Sale - 2021 Reduction		(818)		(818)	D.19-10-010/AL 5825-E-B
Kern Sale - 2021		(1,204)		(1,204)	AL 6083-E
<b>2021 Base Revenue Amount including Pension Adjustment (Eff. 1/1/21)</b>	<b>4,954,021</b>	<b>2,295,912</b>	<b>2,130,477</b>	<b>9,380,411</b>	
2022 Attrition	276,605	(7,760)	94,828	363,673	D.20-12-005, 2020 GRC Decision
2022 Revenue, Fees & Uncollectibles Expense Adjustment	(16)	1	(7)	(22)	AL 4512-G/6373-E
Accumulated Deferred Tax Adjustment					
Reverse 2021 Accumulated Deferred Tax Adjustment	25,635	3,039	(2,507)	26,167	D.20-12-005/AL 4367-G/6062-E
2022 Accumulated Deferred Tax Adjustment	(26,913)	(3,201)	2,221	(27,893)	D.20-12-005/AL 4367-G/6062-E
Cost of Capital					
Reverse 2021 Cost of Capital	(21,216)	(5,690)	(8,665)	(35,571)	D.19-12-056, CoC Decision
2022 Cost of Capital	24,132	5,398	9,493	39,023	D.19-12-056, CoC Decision/AL 4275-G/5887-E
Cost of Debt					
Reverse 2021 Cost of Debt Adjustment	91,040	24,636	37,577	153,253	D.19-12-056, CoC Decision/AL 4275-G/5887-E
2021 Cost of Debt Adjustment	(102,810)	(23,374)	(41,180)	(167,364)	D.19-12-056, CoC Decision/AL 4275-G/5887-E
Hydroelectric Sales					
Reverse Narrows Sale - 2021 Reduction		818		818	D.19-10-010/AL 5825-E-B
Narrows Sale - 2022 Reduction		(775)		(775)	D.19-10-010/AL 5825-E-B
Reverse Kern Sale - 2021 Reduction		1,204		1,204	A.20-02-005, AL 6083-E
Kern Sale - 2022		(1,160)		(1,160)	A.20-02-005, AL 6083-E
<b>2022 Base Revenue</b>	<b>5,220,478</b>	<b>2,289,048</b>	<b>2,222,237</b>	<b>9,731,762</b>	

Note: Some totals may not add precisely due to rounding.

\*Actual savings credits will be transferred to the Utility Generation Balancing Account and refunded to customers as part of the Annual Electric True-up advice filing process.

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

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Cenergy Power  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

East Bay Community Energy Ellison  
Schneider & Harris LLP Energy  
Management Service  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie

Green Power Institute  
Hanna & Morton  
ICF

IGS Energy  
International Power Technology

Intertie

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

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

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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

SPURR  
San Francisco Water Power and Sewer  
Semptra Utilities

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

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

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