

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6400E
As of December 14, 2021

Subject: Submittal of Community Choice Aggregator (CCA) Financial Security Requirements in Compliance with D.18-05-022

Division Assigned: Energy

Date Filed: 11-10-2021

Date to Calendar: 11-15-2021

Authorizing Documents: D1805022

Disposition:	Accepted
Effective Date:	12-10-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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

November 10, 2021

Advice 6400-E

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

Subject: Submittal of Community Choice Aggregator (CCA) Financial Security Requirements in Compliance with D.18-05-022

Pacific Gas and Electric Company (PG&E) hereby submits its calculation of the financial security requirements for the Community Choice Aggregators (CCAs) serving customers within its service territory.

Purpose

In compliance with Ordering Paragraph (OP) 8 of Decision (D.) 18-05-022, this advice submittal is to provide the California Public Utilities Commission (CPUC or Commission) with the calculated financial security requirements for Community Choice Aggregators serving customers within its service territory.

Background

On May 31, 2018, the Commission issued D.18-05-022 which established a methodology to derive incremental procurement costs for the financial security requirement and re-entry fees for an involuntary return of Community Choice Aggregation Service customers.

On August 6, 2018, PG&E submitted Advice 5350-E with its initial calculation of the FSR amount for each CCA serving customers in PG&E's service area. Advice 5350-E was approved by the Commission on September 14, 2018 with an effective date of September 13, 2018.

In Advice 5354-E submitted on August 15, 2018, PG&E requested approval to revise PG&E Electric Rule 23, *Community Choice Aggregation Service*, to incorporate the reentry fees and financial security requirements and calculation methodology into PG&E's Community Choice Aggregation Service tariffs. On September 4, 2018, the Alliance the Alliance for Retail Energy Markets (AReM) submitted a protest to Advice 5354-E objecting that D.18-05-022 "does not involve direct access ("DA") customers or

suppliers” and identified four revisions which “have a, perhaps inadvertent effect on direct access that should be remedied....”¹ California Community Choice Association (CalCCA) also submitted a protest on September 4, 2018, raising a number of objections, including the “deletion of “certain provisions relating to the rights of DA-eligible customers (“DA Provisions”).”² On October 2, 2018, PG&E submitted Advice 5354-E-A to request further revisions to PG&E’s Electric Rule 23, *Community Choice Aggregation Service*, to resolve AReM and CalCCA’s Protest of Advice 5354-E.

On October 9, 2020, the Commission issued Resolution E-5059 which approved Advice 5354-E with modifications and the revisions to Electric Rule 23 submitted in Advice 5354-E-A. On November 6, 2020, PG&E submitted a Tier 1 advice letter, Advice 5354-E-B, to request further revisions to PG&E’s Electric Rule 23, *Community Choice Aggregation Service*, in compliance with Resolution E-5059. On November 24, 2020, PG&E received a disposition from the Commission approving Advice Letters 5354-E and 5354-E-A with an effective date of October 9, 2020. On January 15, 2021, PG&E withdrew Advice 5354-E-B and submitted Advice 6060-E to request further revisions to electric Rule 23 in compliance with Resolution E-5059. Advice 6060-E was approved by the Commission on February 24, 2021 with an effective date of February 15, 2021.

OP 8 of D.18-05-022 states:

The amount of the applicable financial security requirement is to be updated twice each year, with a 10% deadband, consistent with the method adopted for electric service providers in Decision 13-01-021.

Consistent with OP 6 of D.13-01-021, the investor-owned utilities are required to update the applicable financial security amounts by the 10th of May and November of each year and to submit them in a Tier 2 Advice Letter.

Attachment B contains a table showing, by CCA, the calculated financial security amount based upon the methodology adopted in D.18-05-022 and approved by the Commission in Advice 6060-E, and draft Resolution E-5170 issued by the Commission on October 28, 2021. The table has been redacted of any confidential CCA information. An unredacted version with the relevant supporting data and calculation of each respective CCA’s financial security amount is included in Confidential Attachment C. A declaration supporting confidential treatment is found in Attachment A. Concurrent with submitting this advice letter to the Energy Division, PG&E will serve by electronic means on each applicable CCA a copy of this advice letter, with the relevant supporting data, redacted of any proprietary information that is not the subject of a non-disclosure agreement or third-party proprietary information that can be acquired through a

¹ Alliance for Retail Energy Markets Protest Of Pacific Gas & Electric Advice Letter 5354-E, dated September 4, 2018, p. 1

² California Community Choice Association Protest Of Pacific Gas & Electric Advice Letter 5354-E, dated September 4, 2018, p. 6

subscription with the Intercontinental Exchange (ICE), and the calculation of each respective CCA's FSR amount provided confidentially only to that specific CCA.

Based upon draft Resolution E-5170, PG&E used the Resource Adequacy (RA) value from the CPUC's 2019 RA Report for Zone NP-26 but, as the RA value is not reflective of current RA market prices, urges the Commission to adopt the use of the updated RA Market Price Benchmarks (MPBs) in Rulemaking (R.) 21-03-011 (POLR OIR).

PG&E used the following data sources for the FSR calculation:

Input Element	Source	Value
Forecasted Energy Prices (Lines 3 - 8)	Intercontinental Exchange (ICE)	November 2021 – April 2022
Customer Re-Entry Fee (Line 15)	Electric Rate Schedule E-CCA	\$4.24 per account
Renewable Energy Credit (REC) Value (Line 21)	2021 PCIA MPB ³ (2022 Forecasted)	\$13.70/MWh
Local RA Volume-Weighted Average Price (Line 24)	2019 CPUC RA Report (Zone NP-26)	\$3.36/kW-mo.
System RA Volume-Weighted Average Price (Line 24)	2019 CPUC RA Report (Zone NP-26)	\$4.29/kW-mo.

The version of this advice letter posted at www.pge.com is redacted.

Protests

*****Due to the COVID-19 pandemic, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **November 30, 2021**, which is 20 days after the date of this submittal. Protests must be submitted to:

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

³ California Public Utilities Commission, "Calculation of the Market Price Benchmarks for the Power Charge Indifference Adjustment" dated November 1, 2021.

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

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

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

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

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

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

Effective Date

PG&E requests that this Tier 2 advice letter become effective on regular notice, **December 10, 2021**, which is 30 calendar days after the date of submittal.

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 **R.03-10-003**. 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/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

cc: Service List R.03-10-003

Attachments:

Public Attachment A – Declaration of David Gutierrez Supporting Confidential Treatment

Public Attachment B – Summary of CCA Financial Security Requirements

Confidential Attachment C - Summary of CCA Financial Security Requirements and Underlying Calculations



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

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

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6400-E

Tier Designation: 2

Subject of AL: Submittal of Community Choice Aggregator (CCA) Financial Security Requirements in Compliance with D.18-05-022

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-05-022

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

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

Confidential treatment requested? ☒ Yes ☐ No

If yes, specification of confidential information: See Confidential Declaration and Matrix
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: David Gutierrez, D1G9@pge.com, 415-257-3285

Resolution required? ☐ Yes ☒ No

Requested effective date: 12/10/21

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

Name: Sidney Bob Dietz II, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

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

Clear Form

**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, David Gutierrez, am a Senior Manager in Community Vitality for Pacific Gas and Electric Company (“PG&E”), a California corporation. Aaron August, the Vice President, Business Development & Customer Engagement, of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
245 Market Street
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): R.03-10-003

3. Title and description of document(s): Advice Letter 6400-E, Submittal of Community Choice Aggregator (CCA) Financial Security Requirements in Compliance With D.18-05-022.
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the

basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
☒	Customer-specific data, which may include demand, loads, names, addresses, and billing data (Protected under PUC § 8380; Civ. Code §§ 1798 et seq.; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)	Attachments B and C: CCA Load Forecast On-Peak (MWh), Off-Peak (MWh), Monthly Peak Demand (MW), Forecast CCA Number of Service Accounts (SA) included in Calculations and Final Calculation Amounts. Confidential information is displayed in red font.
☐	Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual (Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)	
☐	Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 (Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)	
☒	Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data (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)	Attachments B and C: ICE Average Off-Peak and On-Peak Forward Price Information included in Calculations and Final

		Calculation Amounts. Confidential information is displayed in red font.
☐	Corporate financial records (Protected under Govt. Code §§ 6254(k), 6254.15)	
☐	Third-Party information subject to non-disclosure or confidentiality agreements or obligations (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036), ESP Service Agreement Form 79-948 Section 11	
☐	Other categories where disclosure would be against the public interest (Govt. Code § 6255(a)) 	

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 10th day of November, 2021 at San Francisco, California.

/s/ David Gutierrez
David Gutierrez
Senior Manager, Community Vitality
Pacific Gas and Electric Company

Public Attachment B

Summary of CCA Financial Security Requirements

(Redacted)

ATTACHMENT B
Summary of CCA Financial Security Requirements
Public Version

CCA FINANCIAL SECURITY REQUIREMENT	
Pacific Gas and Electric Company	
Advice 6400-E	
November 10, 2021	
Community Choice Aggregator	Total Financial Security
Central Coast Community Energy	
City of King City	
Clean Power SF	
East Bay Community Energy	
Marin Clean Energy	
Peninsula Clean Energy	
Pioneer Community Energy	
Redwood Coast Energy Authority	
San Jose Clean Energy	
Silicon Valley Clean Energy	
Sonoma Clean Power	
Valley Clean Energy	

Confidential Attachment C

Summary of CCA Financial Security Requirements and Underlying Calculations

(Confidential)

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

AT&T	East Bay Community Energy Ellison	Pioneer Community Energy
Albion Power Company	Schneider & Harris LLP Energy	Public Advocates Office
	Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole		Regulatory & Cogeneration Service, Inc.
		SCD Energy Solutions
Atlas ReFuel	GenOn Energy, Inc.	San Diego Gas & Electric Company
BART	Goodin, MacBride, Squeri, Schlotz &	
	Ritchie	
Barkovich & Yap, Inc.	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Water Power and Sewer
California Energy Commission	ICF	Sempra Utilities
	IGS Energy	
California Hub for Energy Efficiency	International Power Technology	Sierra Telephone Company, Inc.
Financing		Southern California Edison Company
	Intertie	Southern California Gas Company
California Alternative Energy and		Spark Energy
Advanced Transportation Financing	Intestate Gas Services, Inc.	Sun Light & Power
Authority	Kelly Group	Sunshine Design
California Public Utilities Commission	Ken Bohn Consulting	Tecogen, Inc.
Calpine	Keyes & Fox LLP	TerraVerde Renewable Partners
	Leviton Manufacturing Co., Inc.	Tiger Natural Gas, Inc.
Cameron-Daniel, P.C.		
Casner, Steve	Los Angeles County Integrated	TransCanada
Cenergy Power	Waste Management Task Force	Utility Cost Management
Center for Biological Diversity	MRW & Associates	Utility Power Solutions
	Manatt Phelps Phillips	Water and Energy Consulting Wellhead
Chevron Pipeline and Power	Marin Energy Authority	Electric Company
City of Palo Alto	McKenzie & Associates	Western Manufactured Housing
		Communities Association (WMA)
City of San Jose	Modesto Irrigation District	Yep Energy
Clean Power Research	NLine Energy, Inc.	
Coast Economic Consulting	NRG Solar	
Commercial Energy		
Crossborder Energy	OnGrid Solar	
Crown Road Energy, LLC	Pacific Gas and Electric Company	
Davis Wright Tremaine LLP	Peninsula Clean Energy	
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		