

November 15, 2021

**Advice 6406-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Pacific Gas and Electric Company's Proposed Partnership Pilot in Compliance with Decision 21-02-006**

**Purpose**

Pacific Gas and Electric Company (PG&E) submits this Tier 2 Advice Letter pursuant to Decision (D.) 21-02-006 to seek approval of the selection of six Candidate Deferral Opportunities, the Total Tariff Budget, the Procurement Goals, and the Subscription Periods for PG&E's 2021-2022 Partnership Pilot (Partnership Pilot) cycle. The Partnership Pilot launch date would be the latter of January 18, 2022,<sup>1</sup> or 30 days after CPUC approval of this Advice Letter. Additional materials including the Offer Acceptance & Contract Execution, Offer Reservation & Affidavit, and Technology Neutral Pro Forma will be provided in PG&E's Partnership Pilot Webinar and Protocol documents.

**Background**

Decision 21-02-006 directed California Investor-Owned Utilities (IOUs) to pilot two frameworks for procuring Distributed Energy Resources (DERs) to avoid or defer utility distribution investments.<sup>2</sup> One of the pilots is called the Partnership Pilot: a 5-year pilot that will test the concept of Ratable Procurement for procuring DERs as a means to reduce the risk of over- and under-procurement by deferring distribution services utilizing Ratable Procurement to mitigate forecast uncertainty.

In developing the Partnership Pilot, D.21-02-006 ordered the IOUs to utilize a framework established in an earlier decision, D.18-02-004, requiring IOUs to submit the Grid Needs Assessment (GNA)<sup>3</sup> and Distribution Deferral Opportunity Report (DDOR)<sup>4</sup> via the Distribution Investment Deferral Framework (DIDF) process. The DIDF is an "ongoing annual process to identify, review, and select opportunities for competitively sourced

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<sup>1</sup> Decision (D.) 21-02-006, at p. 25, Table 1.

<sup>2</sup> D.21-02-006, at p. 2.

<sup>3</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M400/K642/400642070.PDF>

<sup>4</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M400/K593/400593924.PDF>

[DERs] to defer or avoid utility traditional distribution capital investments.”<sup>5</sup> The framework developed through the DIDF process prioritizes candidate deferrals into Tier 1, Tier 2, and Tier 3 projects based on their cost-effectiveness, forecast certainty, and market assessment. PG&E utilized this framework to identify projects for the Partnership Pilot and seek approval of at least one Tier 1 deferral opportunity and two Tier 2 or Tier 3 opportunities.

## **Partnership Pilot**

### **A. Selection of Candidate Deferral Opportunities**

**PG&E is requesting approval to include six Candidate Deferral Opportunities for the 2021-22 Partnership Pilot cycle as listed in Table 1.**

A candidate deferral opportunity is “[a] planned investment included on the shortlist of traditional projects to be deferred using DERs”.<sup>6</sup> Pursuant to the Staff Proposal, each IOU is required to launch three DER candidate deferral opportunity ( at least one Tier 1 and two Tier 2 or Tier 3 ) during each DIDF cycle.<sup>7</sup> PG&E is requesting to include three additional candidate deferral opportunities to further test the Partnership Pilot for a total of six opportunities: four Tier 1 and two Tier 2 or Tier 3. Four of the selected projects (Embarcadero 1116, Embarcadero 1118, Anita 1105, and Belle Haven Bank 5) will provide a means to test the use of Ratable Procurement for forecasted incremental needs and clustering; and the remaining two (Coalinga No 1 Bank 2 and Rocklin 1105) will test the use of Ratable Procurement to address the challenge of forecast uncertainty. Service requirements for the Candidate Deferral Opportunities can be found in Appendix D and E.

**Table 1: Candidate Deferral Opportunities Selected for Partnership Pilot**

<b>Tier</b>	<b>Candidate Deferral</b>	<b>In-Service Date</b>	<b>Deficiency (MW)</b>
Tier 1	Coalinga No 1 Bank 2	5/1/2024	
Tier 1	Embarcadero (SF Z) 1116	4/1/2026	0.3
Tier 1	Embarcadero (SF Z) 1118	6/1/2025	1.3
Tier 1	Rocklin 1105	5/1/2025	0.7
Tier 2	Anita 1105	6/1/2024	3.8
Tier 2	Belle Haven Bank 4	5/1/2024	3.9

As depicted in Table 1, In-Service Dates are the operation dates of the DERs expected to perform. Grid Deficiency is calculated in PG&E’s distribution planning forecast and more details can be found in PG&E’s 2021 GNA and DDOR.

<sup>5</sup> D.21-02-006, at p. 5.

<sup>6</sup> D.21-02-006, Attachment A, at p. 4.

<sup>7</sup> D.21-02-006, Attachment A, at p. 52.

## B. Total Tariff Budget

**PG&E is requesting a Total Tariff Budget in the amount of \$11.453M for the 2021-22 Partnership Pilot cycle as shown in Table 2.**

Based on input from the Distribution Planning Advisory Group (DPAG) on September 22, 2021, PG&E is requesting a Total Budget that reflects the entire forecast period through 2030. For a given Candidate Deferral Opportunity, the Tranche budgets are fixed; however, in the event of a change in the grid-need, the Procurement Goal (i.e., MWs) may be updated. The updated grid needs will be provided annually in the GNA and DDOR. If the grid need is not successfully deferred by DERs, PG&E would not complete the future tranches and the budgets for those tranches would be zero. In the event that there are left over funds in the Performance Budget due to PG&E not utilizing the expected number of calls, those funds would be rolled into a subsequent years' total tranche budgets. This rollover will incentivize participation in the Partnership Pilot while ensuring the Total Tariff Budget is not exceeded.

**Table 2: Final Budget Summary by Opportunity**

Candidate Deferral (\$1000s)	In-Service Year	Tranche							Total Tariff Budget
		1	2	3	4	5	6	7	
Coalinga No. 1 Bank 2	2024	\$401	\$411	\$421	\$432	\$443	\$454	\$465	<b>\$3027</b>
Embarcadero 1116	2026	\$162	\$166	\$170	\$174	\$179	-	-	<b>\$851</b>
Embarcadero 1118	2025	\$159	\$162	\$167	\$171	\$175	\$179	-	<b>\$1,012</b>
Rocklin 1105	2025	\$90	\$92	\$95	\$97	\$99	\$102	-	<b>\$575</b>
Belle Haven Bank 4	2024	\$461	\$473	\$485	\$497	\$509	\$522	\$535	<b>\$3,482</b>
Anita 1105	2024	\$332	\$340	\$349	\$357	\$366	\$375	\$385	<b>\$2,505</b>
<b>Total</b>		<b>\$1,605</b>	<b>\$1,645</b>	<b>\$1,686</b>	<b>\$1,728</b>	<b>\$1,772</b>	<b>\$1,632</b>	<b>\$1,385</b>	<b>\$11,453</b>

As depicted in Table 2, the number of tranches by project will vary depending upon the In-Service Date year. For example, a project with an In-Service Date in 2026 will show five tranches, whereas a project with an In-Service Date in 2024 will show seven tranches.

**Table 3: Tranche 1 Budget Breakdown (\$1,000s)**

Project Name	Deferral Value	Deployment Budget	Reservation Budget	Performance Budget	Tranche Budget
Coalinga No 1 Bank 2	\$472	\$80	\$120	\$201	\$401
Embarcadero 1116	\$190	\$32	\$49	\$81	\$162
Embarcadero 1118	\$186	\$32	\$48	\$79	\$159
Rocklin 1105	\$106	\$18	\$27	\$45	\$90
Anita 1105	\$390	\$66	\$100	\$166	\$332
Belle Haven Bank 4	\$543	\$92	\$138	\$231	\$461

As depicted in Table 3, aggregators will receive Deployment, Reservation, and Performance payments which are summed to equal the Tranche budget, set at 85% of the Deferral Value. All values have been discounted to the year of the In-Service Date for each tranche. Details on Tranches 2-7 can be found in Appendix A.

### C. Procurement Goals

**PG&E requests Commission approval of the Procurement Goals for the 2021-2022 Partnership Pilot cycle.**

Procurement Goals are the amount of capacity needed to defer the Planned Investment for no less than one year.<sup>8</sup> The Procurement Goals for Tranche 1 for all six Candidate Deferral Opportunities are shown below in Table 4.

**Table 4: Tranche 1 Procurement Goals Summary**

Candidate Deferral	Acceptance Trigger (MW)	Grid Need (MW)	Procurement Cap (MW) <sup>9</sup>
Coalinga No. 1 Bank 2			
Embarcadero 1116	0.10	0.11	0.13
Embarcadero 1118	0.34	0.38	0.45
Rocklin 1105	0.3	0.34	0.4
Belle Haven Bank 4	2.89	3.21	3.86
Anita 1105	2.35	2.62	3.14

As depicted in Table 4, the Procurement Goals include the Acceptance Trigger, and Procurement Cap by Tranche for each Candidate Deferral Opportunity. The Acceptance

<sup>8</sup> D.21-02-006, OP 3.

<sup>9</sup> 'Procurement Cap' is also referred to as 'Procurement Margin' in D.21-02-006.

Trigger<sup>10</sup> is defined as the minimum amount of capacity required to execute contracts within the Partnership Pilot framework for a given tranche (90 percent of the Procurement Goal). The Procurement Cap is the maximum allowable amount of capacity for deployment and reservation payments for each Tranche (120 percent of the Procurement Goal). The Procurement Goals as presented in the GNA and the DDOR are based on a forecasted grid need that utilizes future load forecasts to estimate capacity deficiencies.

The number of Tranches and the Procurement Goals (and corresponding Acceptance Trigger, and Procurement Cap), for all tranches are subject to change through annual distribution planning activities and may be updated annually during the DPAG process.<sup>11</sup> Subsequent tranche Procurement Goals may be updated annually during the Distribution Planning process until the entire grid need is met or a tranche procurement is not successful by the Contingency Date, whichever happens first.<sup>12</sup> Payments are discussed in greater detail within Section B.

#### **D. Subscription Periods**

#### **PG&E requests Commission approval of the proposed Subscription Periods for the 2021-22 Partnership Pilot cycle.**

The proposed Subscription Periods for Tranche 1 were calculated using the following factors:

- Subscription Launch Date: the date at which parties are eligible to submit reservations. The Subscription Launch Date for Tranche 1 will be the latter of 30 days after the approval of this advice letter or January 18, 2022;<sup>13</sup>
- Reservation Deadline: date reliant on the Contingency Date of each Candidate Deferral Opportunity. The Reservation Deadline is 60 days prior to the Contingency Date to ensure there is adequate time to: 1) review the reservation; 2) request additional information or clarify project details; and, 3) initiate the awarding and execution of a contract; and,
- Subscription Duration represents the total number of days from the Subscription Launch Date to the Reservation Deadline.

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<sup>10</sup> D.21-02-006, p.58.

<sup>11</sup> D.21-02-006, at p. 78, OP 3.

<sup>12</sup> D.21-02-006, at p. 78, OP 3.

<sup>13</sup> D.21-02-006, Attachment A, at pp. 45-46.

**Table 5: Subscription Periods for Tranche 1<sup>14</sup>**

Project Name	Subscription Launch	Reservation Deadline	Subscription Duration (Days)	Contingency Date	In-Service Date
Coalinga No 1 Bank 2	1/18/2022	6/1/2022	142	8/1/2022	6/1/2024
Embarcadero 1116	1/18/2022	4/1/2023	446	6/1/2023	4/1/2026
Embarcadero 1118	1/18/2022	4/1/2024	812	6/1/2024	6/1/2025
Rocklin 1105	1/18/2022	3/1/2023	415	5/1/2023	5/1/2025
Anita 1105	1/18/2022	3/1/2023	415	5/1/2023	6/1/2024
Belle Haven Bank 4	1/18/2022	5/1/2022	111	7/1/2022	5/1/2024

As depicted in Table 5, the Subscription Launch date is the same for all Candidate Deferral Opportunities, but the Subscription Duration depends on the Reservation Deadline. The Contingency Date<sup>15</sup> is specific to the Candidate Deferral Opportunity and is based on the distribution planning process, which includes the phases of engineering and design, materials procurement, and construction.

Equipment procurement dates for planned investments vary by project and are based on the amount of lead time required to order specific equipment to meet the projects' needs. See Appendix C for all tranches.

**Table 6: Extended Tranche 1 Subscription Dates**

Opportunity	Subscription Launch	Reservation Deadline	Original Subscription Duration (Days)	Extended Subscription Duration (Days)	Contingency Date	In-Service Date
Coalinga No 1 Bank 2	1/18/2022	6/1/2022	21	142	8/1/2022	6/1/2024
Belle Haven Bank 4	1/18/2022	5/1/2022	21	111	4/1/2022	5/1/2024
Anita 1105	1/18/2022	3/1/2023	80	415	5/1/2023	6/1/2024

As depicted in Table 6, PG&E received input during the DPAG webinars held on September 22, 2021 and October 22, 2021, wherein parties identified three Tranche 1 deferred opportunities (Coalinga No 1 Bank 2, Belle Haven Bank 4, and Anita 1105) that would benefit from extended subscription dates. In response to this, PG&E will extend the Subscription Duration and Contingency Date to coincide with the end of the design and

<sup>14</sup> The proposed Subscription Periods in Table 5 are based on an Advice Letter approval date of December 15, 2021.<sup>14</sup>

<sup>15</sup> D.21-02-006, p. 43.

engineering phase of the planned investment rather than the beginning. This will ensure adequate time for aggregators to procure Behind-The-Meter (BTM) DERs.

As a result, PG&E continues to incur costs as the design and engineering of the wire's solution would continue in parallel to the Subscription Period for these three projects. PG&E may therefore incur and track costs in the Distributed Energy Resources Distribution Deferral Account (DERDDA) memorandum account that are considered part of the deferral value attributable to DERs.<sup>16</sup> PG&E is proposing this schedule in order to maximize the opportunities for DERs to participate in the Partnership Pilot.

### **Conclusion and Request for Approval**

For the reasons stated herein, PG&E respectfully requests approval of the following:

1. The six candidate deferral opportunities for the 2021-22 Partnership Pilot cycle as described above in Section A;
2. A total Tariff Budget of \$11.453M for the 2021-22 Partnership Pilot cycle as described above in Section B;
3. The Procurement Goals for the 2021-22 Partnership Pilot cycle as described above in Section C; and,
4. The Subscription Periods for the 2021-22 Partnership Pilot cycle as described above in Section D.

### **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 December 6, 2021, which is 21 days<sup>17</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

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<sup>16</sup> D.18-02-004, at pp. 87-88, OP 2.x. ("The Commission orders that contingency planning shall not be prescribed but rather determined by the IOUs on a case-by-case basis.").

<sup>17</sup> The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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**

Pursuant to General Order (GO) 96-B, Rule 5.2 and D.21-02-006, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice letter become effective on regular notice, December 15, 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.14-10-003. 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





# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

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

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: 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) #: 6406-E

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company's Proposed Partnership Pilot in Compliance with Decision 21-02-006

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.21-02-006

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

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

Confidential treatment requested?  Yes  No

If yes, specification of confidential information: See Confidentiality Declaration & Matrix Attachment  
 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: Quinn Nakayama, (415) 973-3732

Resolution required?  Yes  No

Requested effective date: 12/15/21

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 6406-E  
November 15, 2021

## **Confidentiality Declaration & Matrix**

**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, Quinn Nakayama, am the Director of Integrated Grid Planning & Innovation 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, Mail Code xxx  
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.14-10-003
3. Title and description of document(s): Confidential Advice Letter 6406-E; Confidential Appendix B; and Confidential Appendix D.
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart

Check	Basis for Confidential Treatment	Where Confidential Information is Located on the Documents
<input checked="" 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>	<p>Grey-shaded information in Advice Letter 6406-E; Appendix B; and Appendix D</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 type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.</p> <p>(Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)</p>	
<input type="checkbox"/>	<p>Corporate financial records.</p> <p>(Protected under Govt. Code §§ 6254(k), 6254.15)</p>	

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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)

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Other categories where disclosure would be against the public interest (Govt. Code § 6255(a) [NEED TO EXPLAIN HOW THE PUBLIC INTEREST SERVED BY NOT DISCLOSING THE RECORD CLEARLY OUTWEIGHS THE PUBLIC INTEREST SERVED BY DISCLOSURE]):

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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 15<sup>th</sup> day of November, 2021 at San Francisco, California.



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Quinn Nakayama  
Director, Integrated Grid Planning & Innovation  
Pacific Gas and Electric Company

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

**ADVICE LETTER 6406-E**  
**ATTACHMENT TO DECLARATION**  
November 15, 2021

<b>ATTACHMENT NAME</b>	<b>DOCUMENT NAME</b>	<b>CATEGORY OF CONFIDENTIALITY</b>	<b>LOCATION</b>
Advice Letter AL 6406-E	Advice Letter requesting approval to not include in the DIDF RFO process any remaining candidate deferral opportunities or other planned investments	Customer-specific data	Grey shading in Advice Letter 6406-E, Appendix B and Appendix D

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November 15, 2021

## **Appendix A**

### **Final Budget Summary by Opportunity for All Tranches**

## Appendix A: Final Budget Summary by Opportunity for All Tranches (\$1,000s)

Project Name	Tranche #	Deferral Value	Deployment Budget	Reservation Budget	Performance Budget	Tranche Budget
Coalinga No 1 Bank 2	1	\$472	\$80	\$120	\$201	\$401
Coalinga No 1 Bank 2	2	\$484	\$82	\$123	\$206	\$411
Coalinga No 1 Bank 2	3	\$496	\$84	\$126	\$211	\$421
Coalinga No 1 Bank 2	4	\$508	\$86	\$130	\$216	\$432
Coalinga No 1 Bank 2	5	\$521	\$89	\$133	\$221	\$443
Coalinga No 1 Bank 2	6	\$534	\$91	\$136	\$227	\$454
Coalinga No 1 Bank 2	7	\$547	\$93	\$140	\$233	\$465
Coalinga No 1 Bank 2	<b>TOTAL</b>	<b>\$3,561</b>	<b>\$605</b>	<b>\$908</b>	<b>\$1,513</b>	<b>\$3,027</b>
Embarcadero 1116	1	\$190	\$32	\$49	\$81	\$162
Embarcadero 1116	2	\$195	\$33	\$50	\$83	\$166
Embarcadero 1116	3	\$200	\$34	\$51	\$85	\$170
Embarcadero 1116	4	\$205	\$35	\$52	\$87	\$174
Embarcadero 1116	5	\$210	\$36	\$54	\$89	\$179
Embarcadero 1116	<b>TOTAL</b>	<b>\$1,001</b>	<b>\$170</b>	<b>\$255</b>	<b>\$425</b>	<b>\$850</b>
Embarcadero 1118	1	\$186	\$32	\$48	\$79	\$159
Embarcadero 1118	2	\$191	\$32	\$49	\$81	\$162
Embarcadero 1118	3	\$196	\$33	\$50	\$83	\$167
Embarcadero 1118	4	\$201	\$34	\$51	\$85	\$171
Embarcadero 1118	5	\$206	\$35	\$52	\$87	\$175
Embarcadero 1118	6	\$211	\$36	\$54	\$90	\$179
Embarcadero 1118	<b>TOTAL</b>	<b>\$1,191</b>	<b>\$202</b>	<b>\$304</b>	<b>\$506</b>	<b>\$1,012</b>
Rocklin 1105	1	\$106	\$18	\$27	\$45	\$90
Rocklin 1105	2	\$109	\$18	\$28	\$46	\$92
Rocklin 1105	3	\$111	\$19	\$28	\$47	\$95
Rocklin 1105	4	\$114	\$19	\$29	\$48	\$97
Rocklin 1105	5	\$117	\$20	\$30	\$50	\$99
Rocklin 1105	6	\$120	\$20	\$31	\$51	\$102
Rocklin 1105	<b>TOTAL</b>	<b>\$677</b>	<b>\$115</b>	<b>\$173</b>	<b>\$288</b>	<b>\$575</b>
Anita 1105	1	\$390	\$66	\$100	\$166	\$332
Anita 1105	2	\$400	\$68	\$102	\$170	\$340
Anita 1105	3	\$410	\$70	\$105	\$174	\$349
Anita 1105	4	\$420	\$71	\$107	\$179	\$357
Anita 1105	5	\$431	\$73	\$110	\$183	\$366
Anita 1105	6	\$442	\$75	\$113	\$188	\$375
Anita 1105	7	\$453	\$77	\$115	\$192	\$385
Anita 1105	<b>TOTAL</b>	<b>\$2,947</b>	<b>\$501</b>	<b>\$751</b>	<b>\$1,252</b>	<b>\$2,505</b>
Belle Haven Bank 4	1	\$543	\$92	\$138	\$231	\$461
Belle Haven Bank 4	2	\$556	\$95	\$142	\$236	\$473
Belle Haven Bank 4	3	\$570	\$97	\$145	\$242	\$485
Belle Haven Bank 4	4	\$585	\$99	\$149	\$248	\$497
Belle Haven Bank 4	5	\$599	\$102	\$153	\$255	\$509
Belle Haven Bank 4	6	\$614	\$104	\$157	\$261	\$522
Belle Haven Bank 4	7	\$629	\$107	\$161	\$268	\$535
Belle Haven Bank 4	<b>TOTAL</b>	<b>\$4,097</b>	<b>\$696</b>	<b>\$1,045</b>	<b>\$1,741</b>	<b>\$3,482</b>

## **Appendix B**

### **Procurement Goals Summary for All Tranches**

**(Redacted)**

## Appendix B: Procurement Goals Summary for All Tranches<sup>1</sup>

Project Name	Tranche	In-service Date	Acceptance Trigger (MW)	Procurement Goal (MW)	Procurement Cap (MW)
Coalinga No 1 Bank 2	1	5/1/2024			
Coalinga No 1 Bank 2	2	5/1/2025			
Coalinga No 1 Bank 2	3	5/1/2026			
Coalinga No 1 Bank 2	4	5/1/2027			
Coalinga No 1 Bank 2	5	5/1/2028			
Coalinga No 1 Bank 2	6	5/1/2029			
Coalinga No 1 Bank 2	7	5/1/2030			
Embarcadero 1116	1	4/1/2026	0.10	0.11	0.13
Embarcadero 1116	2	4/1/2027	0.14	0.16	0.19
Embarcadero 1116	3	4/1/2028	0.18	0.20	0.24
Embarcadero 1116	4	4/1/2029	0.22	0.25	0.3
Embarcadero 1116	5	4/1/2030	0.26	0.29	0.35
Embarcadero 1118	1	6/1/2025	0.34	0.38	0.45
Embarcadero 1118	2	6/1/2026	0.70	0.78	0.94
Embarcadero 1118	3	6/1/2027	1.06	1.18	1.41
Embarcadero 1118	4	6/1/2028	1.10	1.22	1.46
Embarcadero 1118	5	6/1/2029	1.13	1.26	1.51
Embarcadero 1118	6	6/1/2030	1.17	1.3	1.56
Rocklin 1105	1	5/1/2025	0.3	0.34	0.4
Rocklin 1105	2	5/1/2026	0.25	0.28	0.34
Rocklin 1105	3	5/1/2027	0.2	0.22	0.27
Rocklin 1105	4	5/1/2028	0.18	0.2	0.24
Rocklin 1105	5	5/1/2029	0.08	0.09	0.11
Rocklin 1105	6	5/1/2030	0.02	0.02	0.02
Belle Haven Bank 4	1	5/1/2024	2.89	3.21	3.86
Belle Haven Bank 4	2	5/1/2025	3.29	3.66	4.39
Belle Haven Bank 4	3	5/1/2026	3.35	3.72	4.46
Belle Haven Bank 4	4	5/1/2027	3.4	3.77	4.53
Belle Haven Bank 4	5	5/1/2028	3.45	3.83	4.59
Belle Haven Bank 4	6	5/1/2029	3.49	3.88	4.66
Belle Haven Bank 4	7	5/1/2030	3.55	3.94	4.73
Anita 1105	1	6/1/2024	2.35	2.62	3.14
Anita 1105	2	6/1/2025	2.51	2.8	3.35
Anita 1105	3	6/1/2026	2.67	2.96	3.56
Anita 1105	4	6/1/2027	2.82	3.13	3.76
Anita 1105	5	6/1/2028	2.98	3.32	3.97
Anita 1105	6	6/1/2029	3.14	3.49	4.19
Anita 1105	7	6/1/20230	3.3	3.67	4.4

<sup>1</sup> These figures will be updated annually in PG&E's DDOR and GNA.

## **Appendix C**

### **Subscription Periods for All Tranches**

## Appendix C: Subscription Periods for All Tranches

Project Name	Tranche	Subscription Launch	Reservation Deadline	Subscription Duration (Days)	Contingency Date	In-Service Date
Coalinga No 1 Bank 2	1	1/18/2022	6/1/2022	142	8/1/2022	6/1/2024
Coalinga No 1 Bank 2	2	8/1/2022	6/1/2023	304	8/1/2023	6/1/2025
Coalinga No 1 Bank 2	3	8/1/2023	6/1/2024	305	8/1/2024	6/1/2026
Coalinga No 1 Bank 2	4	8/1/2024	6/1/2025	304	8/1/2025	6/1/2027
Coalinga No 1 Bank 2	5	8/1/2025	6/1/2026	304	8/1/2026	6/1/2028
Coalinga No 1 Bank 2	6	8/1/2026	6/1/2027	304	8/1/2027	6/1/2029
Coalinga No 1 Bank 2	7	8/1/2027	6/1/2028	305	8/1/2028	6/1/2030
Embarcadero 1116	1	1/18/2022	4/1/2023	446	6/1/2023	4/1/2026
Embarcadero 1116	2	6/1/2023	4/1/2024	305	6/1/2024	4/1/2027
Embarcadero 1116	3	6/1/2024	4/1/2025	304	6/1/2025	4/1/2028
Embarcadero 1116	4	6/1/2025	4/1/2026	304	6/1/2026	4/1/2029
Embarcadero 1116	5	6/1/2026	4/1/2027	304	6/1/2027	4/1/2030
Embarcadero 1118	1	1/18/2022	4/1/2024	812	6/1/2024	6/1/2025
Embarcadero 1118	2	6/1/2024	4/1/2025	304	6/1/2025	6/1/2026
Embarcadero 1118	3	6/1/2025	4/1/2026	304	6/1/2026	6/1/2027
Embarcadero 1118	4	6/1/2026	4/1/2027	304	6/1/2027	6/1/2028
Embarcadero 1118	5	6/1/2027	4/1/2028	305	6/1/2028	6/1/2029
Embarcadero 1118	6	6/1/2028	4/1/2029	304	6/1/2029	6/1/2030
Rocklin 1105	1	1/18/2022	3/1/2023	415	5/1/2023	5/1/2025
Rocklin 1105	2	5/1/2023	3/1/2024	305	5/1/2024	5/1/2026
Rocklin 1105	3	5/1/2024	3/1/2025	304	5/1/2025	5/1/2027
Rocklin 1105	4	5/1/2025	3/1/2026	304	5/1/2026	5/1/2028
Rocklin 1105	5	5/1/2026	3/1/2027	304	5/1/2027	5/1/2029
Rocklin 1105	6	5/1/2027	3/1/2028	305	5/1/2028	5/1/2030
Anita 1105	1	1/18/2022	3/1/2023	415	5/1/2023	6/1/2024
Anita 1105	2	5/1/2023	3/1/2024	305	5/1/2024	6/1/2025
Anita 1105	3	5/1/2024	3/1/2025	304	5/1/2025	6/1/2026
Anita 1105	4	5/1/2025	3/1/2026	304	5/1/2026	6/2/2027
Anita 1105	5	5/1/2026	3/1/2027	304	5/1/2027	6/1/2028
Anita 1105	6	5/1/2027	3/1/2028	305	5/1/2028	6/1/2029
Anita 1105	7	5/1/2028	3/1/2029	304	5/1/2029	6/1/2030
Belle Haven Bank 4	1	1/18/2022	5/1/2022	111	7/1/2022	5/1/2024
Belle Haven Bank 4	2	7/1/2022	5/1/2023	304	7/1/2023	5/1/2025
Belle Haven Bank 4	3	7/1/2023	5/1/2024	305	7/1/2024	5/1/2026
Belle Haven Bank 4	4	7/1/2024	5/1/2025	304	7/1/2025	5/1/2027
Belle Haven Bank 4	5	7/1/2025	5/1/2026	304	7/1/2026	5/1/2028
Belle Haven Bank 4	6	7/1/2026	5/1/2027	304	7/1/2027	5/1/2029
Belle Haven Bank 4	7	7/1/2027	5/1/2028	305	7/1/2028	5/1/2030

## **Appendix D**

### **Service Requirements for Single Grid Need Projects for All Tranches**

**(Redacted)**

## Appendix D: Service Requirements for Single Grid Need Projects for All Tranches<sup>1</sup>

Project Name	Tranche	In-service Date	Acceptance Trigger (MW)	Procurement Goal (MW)	Procurement Cap (MW)	# of months	Months	Calls/ Yr	Hours	Event Duration
Coalinga No 1 Bank 2	1	5/1/2024								
Coalinga No 1 Bank 2	2	5/1/2025								
Coalinga No 1 Bank 2	3	5/1/2026								
Coalinga No 1 Bank 2	4	5/1/2027								
Coalinga No 1 Bank 2	5	5/1/2028								
Coalinga No 1 Bank 2	6	5/1/2029								
Coalinga No 1 Bank 2	7	5/1/2030								
Embaradero 1116	1	4/1/2026	0.1	0.11	0.13	4	Jul to Oct	22	12pm to 4pm	2
Embaradero 1116	2	4/1/2027	0.14	0.16	0.19	4	Jul to Oct	22	12pm to 3pm	3
Embaradero 1116	3	4/1/2028	0.18	0.2	0.24	4	Jul to Oct	21	12pm to 3pm	3
Embaradero 1116	4	4/1/2029	0.22	0.25	0.3	4	Jul to Oct	20	12pm to 4pm	4
Embaradero 1116	5	4/1/2030	0.26	0.29	0.35	4	Jul to Oct	21	12pm to 4pm	4
Embarcadero 1118	1	6/1/2025	0.34	0.38	0.45	12	Jan to Dec	22	11am to 5pm	5
Embarcadero 1118	2	6/1/2026	0.7	0.78	0.94	12	Jan to Dec	42	10am to 5pm	6
Embarcadero 1118	3	6/1/2027	1.06	1.18	1.41	12	Jan to Dec	238	9am to 5pm	8
Embarcadero 1118	4	6/1/2028	1.1	1.22	1.46	12	Jan to Dec	260	9am to 6pm	8
Embarcadero 1118	5	6/1/2029	1.13	1.26	1.51	12	Jan to Dec	261	9am to 6pm	9
Embarcadero 1118	6	6/1/2030	1.17	1.3	1.56	12	Jan to Dec	261	9am to 6pm	9
Rocklin 1105	1	5/1/2025	0.3	0.34	0.4	3	Jun to Aug	23	5pm to 8pm	2
Rocklin 1105	2	5/1/2026	0.25	0.28	0.34	3	Jun to Aug	23	5pm to 7pm	2
Rocklin 1105	3	5/1/2027	0.2	0.22	0.27	3	Jun to Aug	22	6pm to 7pm	1
Rocklin 1105	4	5/1/2028	0.18	0.2	0.24	3	Jun to Aug	21	6pm to 7pm	1
Rocklin 1105	5	5/1/2029	0.08	0.09	0.11	3	Jun to Aug	22	6pm to 7pm	1
Rocklin 1105	6	5/1/2030	0.02	0.02	0.02	3	Jun to Aug	23	6pm to 7pm	1
Belle Haven Bank 4	1	5/1/2024	2.89	3.21	3.86	7	Apr to Oct	154	9am to 9pm	11
Belle Haven Bank 4	2	5/1/2025	3.29	3.66	4.39	7	Apr to Oct	154	9am to 9pm	12
Belle Haven Bank 4	3	5/1/2026	3.35	3.72	4.46	7	Apr to Oct	161	9am to 9pm	12
Belle Haven Bank 4	4	5/1/2027	3.4	3.77	4.53	7	Apr to Oct	160	9am to 9pm	12
Belle Haven Bank 4	5	5/1/2028	3.45	3.83	4.59	7	Apr to Oct	161	9am to 9pm	12
Belle Haven Bank 4	6	5/1/2029	3.49	3.88	4.66	7	Apr to Oct	163	8am to 9pm	13
Belle Haven Bank 4	7	5/1/2030	3.55	3.94	4.73	7	Apr to Oct	163	8am to 9pm	13

<sup>1</sup> These figures will be updated annually in PG&E's DDOR and GNA.

## **Appendix E**

### **Service Requirements for Multiple Grid Needs (Anita 1103)**

## Appendix E. Service Requirements for Multiple Grid Needs (Anita 1103)<sup>1</sup>

Grid Need	Tranche	In-service Date	Acceptance Trigger (MW)	Procurement Goal (MW)	Procurement Cap (MW)	# of months	Months	Calls/Yr	Hours	Event Duration
Nord Bank 1	1	6/1/2024	1.11	1.23	1.48	3	Jun to Aug	70	5pm to 10pm	4
Nord Bank 1	2	6/1/2025	1.1	1.22	1.46	3	Jun to Aug	71	5pm to 9pm	4
Nord Bank 1	3	6/1/2026	1.07	1.19	1.43	3	Jun to Aug	71	5pm to 9pm	4
Nord Bank 1	4	6/1/2027	1.05	1.17	1.4	3	Jun to Jul	61	5pm to 9pm	4
Nord Bank 1	5	6/1/2028	1.04	1.15	1.38	3	Jun to Jul	61	5pm to 9pm	4
Nord Bank 1	6	6/1/2029	1.02	1.13	1.36	2	Jun to Jul	61	5pm to 9pm	4
Nord Bank 1	7	6/1/2030	1	1.11	1.33	2	Jun to Jul	61	5pm to 9pm	4
Nord Bank 2	1	6/1/2024	1.25	1.39	1.66	4	Jun to Sep	60	5pm to 10pm	4
Nord Bank 2	2	6/1/2025	1.38	1.53	1.84	4	Jul to Sep	61	5pm to 9pm	4
Nord Bank 2	3	6/1/2026	1.49	1.66	1.99	3	Jul to Sep	84	5pm to 11pm	6
Nord Bank 2	4	6/1/2027	1.61	1.79	2.15	3	Jul to Sep	84	5pm to 11pm	6
Nord Bank 2	5	6/1/2028	1.74	1.93	2.32	3	Jul to Sep	83	5pm to 11pm	6
Nord Bank 2	6	6/1/2029	1.85	2.06	2.47	3	Jul to Sep	82	5pm to 12am	7
Nord Bank 2	7	6/1/2030	1.98	2.2	2.64	3	Jul to Sep	83	5pm to 12am	7
Anita Bank 1	1	6/1/2024	0	0	0	2	Jul to Aug	0	NA	1
Anita Bank 1	2	6/1/2025	0.05	0.05	0.06	2	Jul to Aug	8	7pm to 8pm	1
Anita Bank 1	3	6/1/2026	0.1	0.11	0.13	2	Jul to Aug	8	7pm to 8pm	1
Anita Bank 1	4	6/1/2027	0.15	0.17	0.2	2	Jul to Aug	9	7pm to 8pm	1
Anita Bank 1	5	6/1/2028	0.22	0.24	0.29	2	Jul to Aug	10	7pm to 8pm	1
Anita Bank 1	6	6/1/2029	0.27	0.3	0.36	2	Jul to Aug	9	7pm to 8pm	1
Anita Bank 1	7	6/1/2030	0.32	0.36	0.43	2	Jul to Aug	8	9am to 6pm	1

<sup>1</sup> These figures will be updated annually in PG&E's DDOR and GNA.

**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  
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