

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



**Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6414E
As of December 10, 2021**

Subject: 2021 Tree Mortality Non-Bypassable Charge Resource Adequacy Sales Solicitation Results

Division Assigned: Energy

Date Filed: 11-22-2021

Date to Calendar: 12-01-2021

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	12-04-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 22, 2021

Advice 6414-E

(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

Subject: 2021 Tree Mortality Non-Bypassable Charge Resource Adequacy Sales Solicitation Results**I. Introduction****A. Identify the Purpose of the Advice Letter**

Pursuant to Decision (D.) 18-12-003, Pacific Gas and Electric Company (PG&E) hereby submits this advice letter to inform the California Public Utilities Commission (Commission or CPUC) of the results of PG&E's Tree Mortality (TM) Non-Bypassable Charge (NBC) Resource Adequacy (RA) Sales Solicitation (TM NBC RA Sales Solicitation).

B. Background

On December 21, 2018, the CPUC issued D.18-12-003 (TM NBC Decision) establishing a methodology to recover the net costs of the mandated Tree Mortality Power Purchase Agreements (TM PPAs), including Burney Forest Products and Wheelabrator Shasta from all customers through a NBC. On February 19, 2019, PG&E submitted its Advice Letter 5478-E, which included the TM NBC RA Sales Framework and Protocols as confidential Appendix C (TM NBC Sales Framework). Following the May 23, 2019 approval of that Advice Letter, and to comply with the D.18-12-003, PG&E made available for sale the RA capacity for its existing TM PPAs with Burney Forest Products and Wheelabrator Shasta by issuing its TM NBC RA Sales Solicitation on July 19, 2019. Pursuant to Senate Bill (SB) 901,¹ PG&E extended contracts with Burney Forest Products and Wheelabrator Shasta, and newly contracted with Woodland Biomass Power. Following the contract extensions and new contract executed pursuant to SB 901, PG&E made available for sale the TM RA capacity for the TM PPAs with Burney Forest Products, Wheelabrator Shasta, and Woodland Biomass Power by issuing its TM NBC RA Sales Solicitation on August 13, 2021. The solicitation

¹ SB 901, Stats. 2018, Ch. 626 (codified in relevant part at Cal. Pub. Util. Code § 8388). Pursuant to SB 901, PG&E will seek to amend contracts that procure electricity generated from biomass to include, or seek approval for new contracts that will include, an expiration date 5 years later than the expiration date in the original contracts (operative in 2018 and expire on or before December 31, 2023), so long as the extensions include applicable feedstock requirements.

was handled through a process that followed the sales framework and protocols described in Advice Letter 5478-E. Per the TM NBC Decision, PG&E will value RA capacity associated with PG&E's TM PPAs using the results of the Solicitation and deduct the total notional value amount from the TM NBC.

C. Solicitation Details in Accordance with PG&E's TM NBC Sales Framework

1. Projects

PG&E offered to deliver RA capacity from the Burney Forest Products, Wheelabrator Shasta and Woodland Biomass facilities (the Projects) listed in Table 1 below, which are currently under contract to PG&E. The product is Generic North System RA capacity for Burney Forest Products and Wheelabrator Shasta, and Local Sierra RA capacity for Woodland Biomass Power.

Table 1: Facility List for Sale

Name of Facility	Technology	Location	Host Balancing Authority	Resource ID
Burney Forest Products	Biomass	County: Shasta Address: 35586-B Highway 299 East Burney, CA 96013	CAISO	BURNYF_2_UNIT 1
Wheelabrator Shasta	Biomass	County: Shasta Address: 20811 Industry Road Anderson, CA 96007	CAISO	WSENGY_1_UNIT 1
Woodland Biomass Power	Biomass	County: Yolo 1786 East Kentucky Avenue Woodland, CA 95776	CAISO	BIOMAS_1_UNIT 1

2. Solicitation Product

In the Solicitation, PG&E made available for sale the RA capacity from its existing TM PPAs listed in Table 2 below.

Table 2: TM PPAs offered in PG&E TM NBC RA Sales Solicitation

Facility Name	Contract Capacity (MW)	Initial Energy Delivery Date	Expected Delivery End Date
Burney Forest Products	29	11/1/2022	10/31/2027
Wheelabrator Shasta	34	1/1/2023	11/30/2027
Woodland Biomass	25	1/1/2022	8/31/2026

The Solicitation resulted in the retention of the RA capacity from PG&E's TM PPA with Woodland Biomass Power from the initial delivery date of January 1, 2022 through the expected delivery end date of August 31, 2026 as shown in Table 2. The retention of RA is consistent with the TM NBC Sales Framework approved as part of Advice Letter 5478-E. The RA Capacity from the contract extensions of the TM PPAs associated with Burney Forest Products and Wheelabrator Shasta went unsold as part of the TM NBC RA Sales Solicitation.

3. Project Background, e.g., Expiring QF Contract, Phased Project, Previous Power Purchase Agreement, Contract Amendment

The Projects are existing and operating facilities under current TM PPAs to deliver RA capacity, among other products, to PG&E.

4. Source of Agreement, i.e., RA Solicitation Year or Bilateral Negotiation

The retained RA resulted from a Solicitation and was evaluated in accordance with the TM NBC Sales Framework. Relevant Solicitation materials provided to bidders are provided in public Appendices A and B.

D. General Transaction Description

The Projects are described in Table 1 above. As the contract extensions associated with Burney Forest Products and Wheelabrator Shasta went unsold and PG&E retained the capacity from Woodland Biomass Power, there were no transactions from this solicitation.

E. General Transaction Structure

While there were no transactions from this solicitation, PG&E will retain the Local Sierra RA capacity from the Projects under the TM PPAs.

1. Full Available Facility Capacity

PG&E will retain RA capacity from the Woodland Biomass Project listed in Table 1 above.

2. Outage Management (e.g., planned outages, forced outages, substitution)

The allocation of all penalties and incentives associated with the RA capacity from these Projects, including those incurred from the Resource Adequacy Availability Incentive Mechanism (RAAIM), are discussed in Advice Letter 5478-E Appendix C. .

F. Confidentiality

Explain if confidential treatment of specific material is requested. Describe the information and reason(s) for confidential treatment consistent with the showing required by D.06-06-066, as modified by D.08-04-023.

In support of this Advice Letter, PG&E has provided confidential information in certain attachments that are marked as confidential. This information is being submitted in the manner directed by D.08-04-023 and the August 22, 2006, Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with D.06-06-066 to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under either the terms of the Investor Owned Utility Matrix, Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023, or Public Utilities Code section 454.5(g). A separate Declaration Seeking Confidential Treatment is being submitted concurrently with this Advice Letter.

II. Consistency with Commission Decisions

A. PG&E Advice 5478-E

- 1. Identify the Commission approval of the utility's Resource Adequacy Sales Framework and Protocols for Tree Mortality contracts. Did the utility adhere to the filing?**

PG&E's TM NBC Sales Framework was approved by the Commission on May 23, 2019 as part of PG&E's Advice Letter 5478-E. PG&E complied with all procedural requirements of D.18-12-003 with regard to the filing of its TM NBC Sales Framework.

- 2. Discuss how the Transactions are consistent with the utility's Resource Adequacy Sales Framework and Protocols for Tree Mortality contracts and meet utility procurement and portfolio needs (e.g., capacity, electrical energy, resource adequacy, or any other product resulting from the Transactions).**

Pursuant to D.18-12-003, PG&E developed the TM NBC Sales Framework, submitted as Appendix C in the approved Advice 5478-E, to make available for sale the RA capacity from its existing TM PPAs.

Consistent with the TM NBC Sales Framework, PG&E submitted a reserve price for the Woodland Biomass TM RA based on a need for its Bundled Portfolio, and notified the CPUC, PRG and Independent Evaluator prior to the issuance of the solicitation. Due to the fact that PG&E was the sole bidder for the Woodland Biomass TM RA capacity, it will retain the RA and no confirmation will be executed.

- 3. Sales**

- a. For Sales contracts, provide a quantitative analysis that evaluates selling the proposed contracted amount vs. using the RA towards future RA compliance requirements (or any reasonable other options).**

D.18-12-003 required PG&E to make available for sale the RA capacity from its existing TM PPAs. Additional details on PG&E's quantitative analysis regarding the TM NBC RA Sales Solicitation can be found in confidential Appendix C.

- b. Explain the process used to determine price reasonableness, with maximum benefit to ratepayers.**

PG&E followed the approved TM NBC Sales Framework to evaluate bids resulting from the Solicitation. The TM NBC Sales Framework described the approach that would be used to evaluate bids and identified sales price as the sole quantitative evaluation criterion. Additional details on PG&E's consistency with Commission decisions in the bid selection process can be found in confidential Appendix C.

B. Procurement Review Group (PRG) Participation

1. List PRG participants (by organization/company).

PG&E's PRG includes the Commission's Energy Division, the Office of Ratepayer Advocates, The Utility Reform Network, the Coalition of California Utility Employees, and Coast Economic Consulting.

2. Describe the utility's consultation with the PRG, including when information about the contract was provided to the PRG, whether the information was provided in meetings or other correspondence, and the steps of the procurement process where the PRG was consulted.

On August 13, 2021, PG&E provided the TM NBC RA Sales Solicitation market notice to the PRG via email.

On August 30, 2021, PG&E provided an update, via email, to the PRG regarding the shortlist of bids received in the Solicitation.

C. Independent Evaluator (IE)

1. The use of an IE is required by D.04-12-048 and D.07-12-052. Provide name of the IE and the oversight provided by the IE.

The IE is Charles Janecek of PA Consulting. The IE provided active oversight of PG&E's communication within the Solicitation beginning prior to issuance and continuing through contract execution. The IE provided input in advance of the Solicitation's launch with the goal of maximizing the effectiveness of PG&E's outreach. During the Solicitation, the IE reviewed e-mails exchanged between PG&E and the counterparties.

2. List when the IE made any findings to the Procurement Review Group regarding the applicable solicitation, the project/bid, and/or contract negotiations.

The IE concludes in the IE report that the Solicitation was conducted in a fair and equitable manner.

3. Insert the public version of the project-specific IE Report.

The confidential version of the IE report is attached to this Advice Letter as Appendix F. A public, redacted IE report is attached to this Advice Letter as Appendix G.

D. Request for Commission Disposition

PG&E requests that the Energy Division issue a disposition letter no later than December 4, 2021. Any such disposition that makes this advice letter effective shall be deemed to constitute the following:

1. A finding that the solicitation result is consistent with the TM NBC Sales Framework

approved as part of Appendix C in PG&E's Advice Letter 5478-E and is consistent with OP 5 of Decision 18-12-003, and that the retention of RA capacity is in the public interest;

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*****

PG&E requests for an expedited protest period of 10 days. Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 2, 2021, which is 10 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

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, Rule 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, Rule 3.11).

Effective Date

PG&E requests that this Tier 1 Advice Letter become effective upon submittal and receive a disposition letter by no later than December 4, 2021 in order to include the Project in the appropriate filings for the RA compliance month of January 2022.

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 list shown below, including the service list for A.16-11-005. Non-market participants who are members of PG&E's PRG and have signed appropriate Non-Disclosure Certificates will also receive the Advice Letter and accompanying confidential attachments by overnight mail. Address changes to the General Order 96-B service list should be directed to 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 filings can also be accessed electronically at <http://www.pge.com/tariffs>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

Attachments:

- Appendix A: PG&E Notifications of TM NBC RA Sales Solicitation Issuance
- Appendix B: PG&E TM NBC RA Sales Solicitation Bid Form
- Appendix C: PG&E TM NBC RA Sales Solicitation Bid Evaluation and Consistency with
Commission Decisions and Rules (Confidential)
- Appendix D: PG&E TM NBC RA Sales Solicitation Independent Evaluator Report (Redacted)

cc: Service List for A.16-11-005
Cheryl Lee – Energy Division

Limited Access to Confidential Material

The portions of this Advice Letter marked Confidential Protected Material are submitted under the confidentiality protection of 454.5(g) of the Public Utilities Code. This material is protected from public disclosure because it consists of, among other items, the PPSA itself, price information, and analysis of the PPSA, which is protected pursuant to D.06-06-066 and D.08-04-023. A separate Declaration Seeking Confidential Treatment regarding the confidential information is filed concurrently herewith.



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) #: 6414-E

Tier Designation: 1

Subject of AL: 2021 Tree Mortality Non-Bypassable Charge Resource Adequacy Sales Solicitation Results

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: Yes, 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: Alan Wecker, (415) 973-7292

Resolution required? Yes No

Requested effective date: 11/22/21

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 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:

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

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF ALAN WECKER
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION CONTAINED
IN ADVICE LETTER 6414-E**

I, Alan Wecker, declare:

1. I am a Manager in the Portfolio Management department within the Energy Policy and Procurement organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include overseeing Commercial Policy and Compliance activities. 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 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain procurement data and information contained in the attachments to Advice Letter 6414-E.
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 Public Utilities Code section 454.5(g), D.06-06-066, D.08-04-023 and/or relevant Commission rules. 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 that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on November 22, 2021 at San Francisco, California.

/s/

Alan Wecker
Manager, Portfolio Management

Advice 6414-E
November 22, 2021

Appendix A

PG&E Notifications of TM NBC RA Sales Solicitation Issuance

Ho, Annie

From: RA_Solicitations
Sent: Friday, August 13, 2021 5:00 PM
To: RA_Solicitations
Cc: PGE_IE@PACONSULTING.COM
Subject: PG&E RA and Import Energy E-Solicitation
Attachments: EEI Import Allocation Rights Confirm.docx; EEI RA Confirm.docx; TMNBC_RA_Sale_Confidentiality_Agreement.docx; PGE AL 5478-E - Unit Specific RA Confirm.docx

To Prospective Participant:

Pacific Gas and Electric Company (“PG&E”) invites your participation in the first phase of its **2022 Annual Resource Adequacy (“RA”) and Import Energy Electronic Solicitation (“E-Solicitation”)** via this Market Notice. As part of this solicitation PG&E is also soliciting bids for resource specific RA from its Tree Mortality units. Please see below for further details.

The deadline to submit a response is 5:00 pm (PPT), Friday, August 20, 2021, unless subsequently modified by PG&E. Refer to section four below for circumstances in which PG&E may modify the timeline.

This Market Notice describes the schedule and process by which participants may submit offers and bids, and under which PG&E will evaluate all offers and bids submitted. PG&E, at its sole discretion, may change the terms, requirements, and schedule of this E-Solicitation.

PG&E is seeking the following proposals:

RA Capacity, Import Rights, and Import Energy

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

**PG&E’s preference is to transact Import Energy indexed to CAISO LMP, but PG&E will consider offers for Fixed Prices or ICE Indexed transactions too.*

RA Capacity Sales from Tree Mortality (TM) Units (details below)

Product	Generator	PG&E is Seeking to	MINIMUM VOLUME ¹	CONTRACT DELIVERY PERIOD			Pricing
				START DATE	END DATE	DELIVERY PERIOD	
Generic System RA	Burney Forest Products	Sell	29 MW	11/01/2022	10/31/2027	Monthly	Fixed Price \$/kW-month
Generic System RA	Wheelabrator Shasta	Sell	34 MW	01/01/2023	11/30/2027	Monthly	Fixed Price \$/kW-month
Sierra Local RA	Woodland Biomass	Sell	25 MW	01/01/2022	08/31/2026	Monthly	Fixed Price \$/kW-month

Quantities are based on the lessor of the 2021 Net Qualifying Capacity (NQC) and the TM contract quantities. Quantities will be adjusted for 2022-2027 when updated NQCs are available.

Pursuant to Commission issued Decision 18-12-003 establishing a methodology for calculating a non-bypassable charge for costs associated with certain tree mortality biomass energy procurement, PG&E is issuing its 2021 Tree Mortality Non-Bypassable Charge Resource Adequacy Sales ("TM NBC RA Sales") Solicitation for the sale of Resource Adequacy. To be considered for these products, please use the separate TMRA bid form, and submit by the response deadline in Table 1. Please note that only bids for the full contract quantity and term of one or more facilities is allowed.

1. RA and IAR Master Agreement and Confirmations

PG&E will transact RA and IAR products under an EEI Master Agreement. The executed Master Agreement shall govern transactions entered into pursuant to this Electronic Solicitation, including transaction details agreed to in any RA or IAR Confirmation Agreement ("Confirmation"). If a successful participant does not have an executed EEI Master Agreement in place with PG&E at the time of shortlist acceptance, additional time may be required to execute an EEI Master Agreement prior to execution of any Confirmation(s).

PG&E provides the attached RA and IAR Confirmations that set forth the terms and conditions to create and define the Products to be transacted. The Confirmations require participants to comply with the RA requirements as implemented by both the California Public Utilities Commission and the California Independent System Operator ("CAISO"). The Confirmation is specific to transactions executed under an EEI Master Agreement with a PG&E Collateral Annex, and, as such, successful participants must have an EEI Master Agreement with a PG&E Collateral Annex in place with PG&E prior to execution of an unmodified Confirmation in this Electronic Solicitation. Modification of the Confirmation may be necessary for those participants without a PG&E Collateral Annex.

2. Import Energy Confirmation

Import Energy offers should be for WSPP Schedule C firm energy.

PG&E seeks to include the following language in Import Energy Confirmations:

Any energy associated with a Day Ahead or Real Time schedule interruption due to an Uncontrollable Force, consistent with provision C-3.7(b) of the WSPP Service Schedule C for Firm Capacity/Energy Sale or Exchange shall be deemed "Undelivered Energy". PG&E deems CAISO overscheduling on paths as Uncontrollable Force. The contract quantity shall be reduced by the amount of any Undelivered Energy for settlement purposes.

Seller hereby agrees that the Product is not sourced from resources internal to the CAISO Balancing Authority Area. Buyer shall have no obligation to accept any energy sourced from resources internal to the CAISO Balancing Authority Area, and any such energy shall not be considered Product.

CAISO Balancing Authority Area refers to the collection of generation, transmission, and loads within the metered boundaries of the California Independent System Operator Corporation.

3. Tree Mortality RA (TMRA) Sales Confirmation

PG&E will only use the EEI Unit-Specific RA Confirmation of Agreement presented in Appendix D of [Advice Letter 5478-E](#) for any transactions resulting from the TM NBC RA Sales Solicitation. To be considered in this solicitation, bidders must have a fully executed EEI Master Agreement with a Collateral Annex in place with PG&E prior to submitting a bid. Please email RASolicitations@pge.com to request executable versions of the EEI Master Agreement and Collateral Annex if you would like to participate in the solicitation.

4. Submitting Offers and Bids

Interested participants should submit the Offer and Bid Form. PG&E has received some reports of firewall software blocking receipt of the Offer and Bid Form. **Therefore, the form will be delivered in a separate email following the market notice.** If you wish to participate in the solicitation and do not receive this second notice, please contact PG&E at RASolicitations@pge.com.

If seeking to transact Import Energy, participants should also include an Import Energy Confirmation which incorporates the language from Section 2 above. PG&E will not consider material changes to its RA or IAR confirmations issued with this solicitation.

All bids and offers for RA or IARs included in the Offer and Bid Form should be submitted with final pricing. PG&E will not be conducting a price refresh for those products as part of this solicitation. PG&E will consider RA and IARs offers and bids final. PG&E may consider refreshed pricing for Import Energy offers, especially if those offers are fixed price.

Offers and bids must be submitted via e-mail to the PGE RA Solicitations mailbox (RASolicitations@pge.com), with a copy to the Independent Evaluator Charles Janecek (PGE_IE@PACONSULTING.COM) by the deadline indicated in Table 1 below. Telephonic, hardcopy, or facsimile transmission of an offer or bid is not acceptable. PG&E will not be responsible for any unsuccessful transmittals.

5. Schedule for Offers and Bids

The table below provides the tentative schedule for this E-Solicitation, which is subject to change at PG&E's discretion.

Table 1

Event	Target Deadline
PG&E launches E-solicitation	Friday, 8/13
Offers and Bids due	5 pm (PPT) Friday, 8/20
PG&E notifies participants of shortlist status	Wednesday, 9/1
Deadline for notified shortlisted participants to accept shortlist status and final volumes	Thursday, 9/2
Target full execution of confirmations	Thursday, 9/16

If the CAISO has not released Draft 2022 Net Qualifying Capacity (NQC) values by Wednesday, August 18, PG&E may delay all the above deadlines on a day by day basis until the Draft 2022 NQCs have been released. PG&E retains the right to modify the schedule for other reasons unrelated to 2022 NQC values. In the event of any changes to the schedule,

PG&E shall communicate those changes through a market notice sent in reply to this email. The email will include a new modified schedule.

Soon after the conclusion of this solicitation, PG&E plans to issue a second phase of its 2022 Annual RA and Import Energy E-Solicitation. This second phase will target execution before October 31, 2021.

6. Contact Information

Questions regarding this Electronic Solicitation and process should be addressed to the PGE RA Solicitations mailbox RASolicitations@pge.com, with a copy to the Independent Evaluator Charles Janecek (PGE_IE@PACONSULTING.COM).

7. Disclaimers

This Electronic Solicitation does not constitute an offer for sale or bid to purchase and creates no obligation to execute any agreement or to enter into any transaction. Any transactions are subject to PG&E management approval and execution of final documents. PG&E shall retain the right at any time, in its sole discretion, to reject any offer or bid and/or modify, suspend or cancel this Electronic Solicitation, for any reason whatsoever, without prior notification to Participants and without liability of any kind to, or responsibility of, PG&E or anyone acting on PG&E's behalf.

Thank you for your consideration of this Electronic Solicitation.

Kind regards,

PG&E

Advice 6414-E
November 22, 2021

Appendix B

PG&E TM NBC RA Sales Solicitation Bid Form



Tree Mortality Non-Bypassable Charge (TMNBC)
Resource Adequacy (RA) Sale Solicitation Bid Form

0% Complete

0 of 37 input requirements satisfied

ENABLE MACROS OR THIS WORKBOOK WILL NOT FUNCTION PROPERLY.

Macros can be enabled by clicking the "Enable Macros" button on the "Microsoft Excel Security Notice" that is displayed before the form opens...



...or by clicking the "Enable Content" button that is sometimes displayed at the top of the screen when the form first opens.



Contact Information

Bidder Name:	
Bidder Type:	
Email:	
Phone:	
Street:	
City:	
State:	
Zip:	

Buyer/Counterparty same as Bidder	<Choose>
-----------------------------------	----------

Buyer/Counterparty:	
Buyer/Counterparty Type:	
Email:	
Phone:	
Street:	
City:	
State:	
Zip:	

Facility Name: Burney Forest Products

I am submitting a bid for this facility	<Choose>
-----------------------------------------	----------

Facility Name: Wheelabrator Shasta

I am submitting a bid for this facility	<Choose>
-----------------------------------------	----------

Facility Name: Woodland Biomass Power

I am submitting a bid for this facility	<Choose>
-----------------------------------------	----------

Participant's Non-Disclosure Agreement (NDA)

By submitting a bid, Participant agrees to adhere and be bound by the confidentiality provisions described in the 2021 Tree Mortality Non-Bypassable Charge (TMNBC) Resource Adequacy (RA) Confidentiality Agreement included in the Market Notice.

Title:	
Electronic Signature:	
Select "Yes" to certify that the typed name acts as your electronic signature.	

Acknowledgement of Protocol

By selecting "Yes" Participant hereby agrees to the terms of the Solicitation. Participant acknowledges that any costs incurred to become eligible or remain eligible for the solicitation, and any costs incurred to prepare a bid for this solicitation are solely the responsibility of Participant.

Title:	
Electronic Signature:	
Select "Yes" to certify that the typed name acts as your electronic signature.	

Participant Authorization

By selecting "Yes" Participant hereby confirms that they are "a duly authorized representative of Participant."

Title:	
Electronic Signature:	
Select "Yes" to certify that the typed name acts as your electronic signature.	

Attestation

By providing the electronic signature below Participant hereby attests that all information provided in this Bid Package and in response to this 2021 Tree Mortality Non-Bypassable Charge (TMNBC) Resource Adequacy (RA) Sale Solicitation is true and correct to the best of Participant's knowledge as of the date such information is provided.

Title:	
Electronic Signature:	
Select "Yes" to certify that the typed name acts as your electronic signature.	

Advice 6414-E
November 22, 2021

Appendix C

**PG&E TM NBC RA Sales Solicitation Bid Evaluation and
Consistency with Commission Decisions and Rules
(Confidential)**

Advice 6414-E
November 22, 2021

Appendix D

**PG&E TM NBC RA Sales Solicitation Independent
Evaluator Report
(Redacted)**



PACIFIC GAS & ELECTRIC

INDEPENDENT EVALUATOR REPORT
2021 TREE MORTALITY NON-
BYPASSABLE CHARGE RESOURCE
ADEQUACY SALES SOLICITATION

October 2021

Bringing Ingenuity to Life
paconsulting.com

Los Angeles Office
PA Consulting Group Inc.
601 W. 5th Street
Suite 910
Los Angeles
CA 90071
USA
+1 213 689 1515
paconsulting.com

Prepared by: C. Janecek and L. Farih
Reference: 1950
Version: 1



Independent Evaluator Report

PA Consulting Group, Inc. (PA) served as the Independent Evaluator (IE) for the Pacific Gas & Electric (PG&E) 2021 Tree Mortality Non-Bypassable Charge Resource Adequacy Sales Solicitation (2021 TM NBC RA Sales Solicitation or the Solicitation). This report provides a summary of PA's evaluation of the Solicitation from the drafting of the Solicitation documents through the shortlisting of the selected bid. No bids resulted in an executed contract to be recommended to the California Public Utilities Commission (CPUC or Commission).

Overview of Solicitation

Per PG&E's CPUC approved Advice Letter 5478-E (Advice Letter) and in compliance with Decision (D.) 18-12-003, approved on May 23, 2019, PG&E issued its 2021 TM NBC RA Sales Solicitation on August 13, 2021.

Through this Solicitation, PG&E offered to sell Generic System Resource Adequacy (RA) capacity from PG&E's Tree Mortality (TM) Power Purchase Agreements (PPA) with Burney Forest Products and Wheelabrator Shasta. Additionally, through this Solicitation PG&E offered to sell Sierra Local RA capacity from PG&E's TM PPA with Woodland Biomass. For the Solicitation, PG&E solicited interest and offers to sell TM RA from:

- Burney Forest Products from November 1, 2022 through October 31, 2027;
- Wheelabrator Shasta from January 1, 2023 through November 30, 2027;
- Woodland Biomass from January 1, 2022 through August 31, 2026.

In the Solicitation documents, PG&E specified the minimum amounts of TM RA capacity it wished to sell. The Burney Forest Products PPA had an associated 29 MW to sell, the Wheelabrator Shasta PPA had an associated 34 MW to sell, and the Woodland Biomass PPA had an associated 25 MW of capacity to sell. Ultimately, PG&E received two bids to the Solicitation from one counterparty. Both bids were shortlisted, but the counterparty did not accept the shortlisted volumes and therefore no sales were contracted.

PA's IE Report

PA's IE reports typically follow the CPUC's Solicitation Shortlist Report Templates. However, due to only receiving two bids and not transacting with the counterparty, this report is an abbreviated summary of the typical sections in an IE report.

Main IE Activities During Solicitation

PA's role in PG&E's 2021 TM NBC RA Sales Solicitation spanned approximately two months from August to October 2021. PA performed the role of IE and was involved from PG&E's development of the Market Notice and Solicitation materials through the selection of shortlisted bids. PA ensured that the procedures followed by PG&E were aligned with the process it established in the Advice Letter and the associated Solicitation protocol documents and provided fair and equitable treatment of all bids. PA was in regular contact with PG&E staff throughout the process. The following provides a summary of PA's main activities during this solicitation:

- PA reviewed and commented on drafts of the Market Notice documents prior to PG&E issuing the Solicitation on August 13, 2021.

- Prior to PG&E issuing the Solicitation on August 13, 2021, PA reviewed PG&E's notification to the Procurement Review Group and Energy Division of PG&E's reserve price for the Woodland Biomass TM RA.
- PA received all communications between PG&E and bidders. PA directly received all of the emails to and from bidders.
- PA reviewed the bids received via email submittals.
- PA reviewed PG&E's Offer Evaluation model and concurred with PG&E's selection of the shortlisted bids.

Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices via email to PG&E's wholesale RFO distribution list and 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. PA believes that PG&E extended adequate outreach for the 2021 TM NBC RA Sales Solicitation.

PG&E's Bid Evaluation Methodology

PG&E primarily relied on a quantitative evaluation of each bidder's proposed price for each TM RA product. In this Solicitation, only one counterparty submitted two bids, one each for two separate products, making the evaluation straightforward. PA found PG&E's bid evaluation methodology appropriate for this Solicitation and aligned with the strategy proposed in Advice Letter 5478-E.

PG&E's Shortlisting and Negotiations of Confirm

As noted, PG&E received two bids for this Solicitation from one bidder for two of the three TM RA products. PG&E found the bid price reasonable and shortlisted the bids but ultimately did not contract with the bidder as the bidder did not accept the shortlisted volumes.

Consistent with PG&E's identified portfolio needs, PG&E submitted a reserve price into the Solicitation for the Sierra Local RA for the delivery period of January 2022 through and including August 2026. The reserve price is █████/kW-month. The TM RA product in the Sierra Local Area is from the Woodland Biomass Power facility. The two bids referenced above were for the Burney Forest Products and Wheelabrator Shasta resources, meaning that PG&E's reserve price bid for the Sierra Local RA did not compete with the two other bids.

Pending CPUC disposition of PG&E's post-solicitation Tier 1 advice letter, PG&E will retain the Sierra Local RA per its reserve price bid.

Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2021 TM NBC RA Sales 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 2021 TM NBC RA Sales Solicitation fairly.



About PA.

We believe in the power of ingenuity to build a positive human future in a technology-driven world.

As strategies, technologies and innovation collide, we create opportunity from complexity.

Our diverse teams of experts combine innovative thinking and breakthrough use of technologies to progress further, faster. Our clients adapt and transform, and together we achieve enduring results.

An innovation and transformation consultancy, we are 3,300 specialists in consumer and manufacturing, defence and security, energy and utilities, financial services, government and public services, health and life sciences, and transport. Our people are strategists, innovators, designers, consultants, digital experts, scientists, engineers and technologists. We operate globally from offices across the UK, US, Netherlands and Nordics.

PA. Bringing Ingenuity to Life.

Discover more at paconsulting.com

Los Angeles Office
PA Consulting Group Inc.
601 W. 5th Street
Suite 910
Los Angeles
CA 90071
USA
+1 213 689 1515

paconsulting.com

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**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