

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 6444E**  
**As of January 21, 2022**

Subject: Update to Pacific Gas and Electric Company's Bundled Procurement Plan Greenhouse Gas and Natural Gas Pipeline Capacity Procurement Limits and Resource Adequacy Solicitation Schedule

Division Assigned: Energy

Date Filed: 12-22-2021

Date to Calendar: 12-24-2021

Authorizing Documents: None

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>12-22-2021</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**



**Sidney Bob Dietz II**  
Director  
Regulatory Relations

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

Fax: 415-973-3582

December 22, 2021

**Advice 6444-E**  
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Update to Pacific Gas and Electric Company's Bundled Procurement Plan – Greenhouse Gas and Natural Gas Pipeline Capacity Procurement Limits and Resource Adequacy Solicitation Schedule**

### **Introduction**

Pacific Gas and Electric Company (PG&E) hereby submits to the California Public Utilities Commission (Commission or CPUC) this advice letter to update greenhouse gas (GHG) and natural gas pipeline capacity procurement limits in PG&E's approved Bundled Procurement Plan (BPP). PG&E also proposes to update its BPP to revise PG&E's Resource Adequacy (RA) Solicitation Schedule within Appendix S (Sales Framework) to cover delivery periods for the current and upcoming calendar years.

### **Background**

PG&E's BPP establishes the utility's procurement authority on behalf of bundled customers, consistent with Public Utilities Code Section 454.5, which obviates the need for an after-the-fact reasonableness review by the Commission as long as the resulting utility procurement decisions are consistent with the approved plan. In Decision (D.) 15-10-031, the Commission adopted the investor-owned utilities' proposed BPPs with modifications and required PG&E to submit a conformed copy of its BPP, which was submitted on December 10, 2015.<sup>1</sup> Since then, PG&E has updated the BPP as needed, pursuant to certain advice letter filings that have appropriately been approved by the Commission, when market conditions or electric portfolio changes necessitate modifying the BPP. On March 18, 2021, the Commission approved PG&E's Advice Letter 5985-E via Resolution E-5129, which extended PG&E's procurement authority under its Conformed 2014 BPP on a rolling basis until an updated or new bundled procurement plan is approved for PG&E in the 2020 Integrated Resource Plan Proceeding (R.20-05-003) or elsewhere.

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<sup>1</sup> On June 15, 2016, Energy Division issued a disposition letter approving PG&E's Conformed BPP submitted in Advice Letter 4750-E, consistent with D.15-10-031 and D.16-01-015.

PG&E's BPP establishes electrical capacity procurement limits and ratable rates that apply to electric capacity transactions with deliveries beyond the prompt calendar year.<sup>2</sup> The BPP indicates that PG&E will file an "annual (or more frequent, if necessary) update to its electrical capacity, electric energy, natural gas, and greenhouse gas procurement limit and ratable rates in Appendix C in a Tier 1 advice letter".<sup>3</sup> During the years in which PG&E does not file an updated conformed bundled procurement plan, PG&E will submit changes to the BPP procurement limits and ratable rates via a Tier 1 advice letter.

### **Discussion**

In this advice letter, PG&E adjusts the previously approved GHG and natural gas pipeline capacity procurement limits as illustrated by Confidential Attachments A and B, but is not proposing any other updates to its approved procurement limits and ratable rates at this time. Confidential Attachments A and B of this advice letter include redlined and clean versions of the revised GHG and natural gas pipeline capacity procurement limits tables appearing in Section B ("Natural Gas Procurement Limits") and Section C ("GHG Procurement Limits") of Appendix C of the BPP.

PG&E also seeks to modify Appendix S to its BPP to update PG&E's RA solicitation schedule. Appendix S includes a schedule of anticipated start dates for PG&E solicitations. PG&E is expected to update this schedule on an annual basis via Tier 1 Advice Letter and does so here.

In accordance with D.07-12-052, all proposed updates to the BPP are to be made via an advice letter and shall include red-lined pages of the BPP as well as clean replacement pages.<sup>4</sup>

### **Confidentiality**

In support of this Advice Letter, PG&E submits Confidential Attachments A, B, and C in the manner directed by D.14-10-033, D. 06-06-066, and D.08-04-023 to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under D.14-10-033, D. 06-06-066, General Order 66-D and Public Utilities Code Section 454.5(g). A separate Declaration Seeking Confidential Treatment is being submitted concurrently with this Advice Letter.

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<sup>2</sup> BPP, Sheet Nos. 65-67.

<sup>3</sup> BPP, Sheet No. 37.

<sup>4</sup> D.07-12-052 at pp. 184-185.

**Attachments**

Confidential Attachment A	Proposed Edits to Natural Gas Pipeline Capacity and GHG Procurement Limits, BPP Sheets 75, 76, 80, 81, 83, 84 (Redline)
Confidential Attachment B	Proposed Edits to Natural Gas Pipeline Capacity and GHG Procurement Limits, BPP Sheets 75, 76, 80, 81, 83, 84 (Clean)
Confidential Attachment C	Confidential Workpapers - GHG Procurement Limits
Public Attachment D	Proposed Edits to Natural Gas Pipeline Capacity and GHG Procurement Limits, BPP Sheets 75, 76, 80, 81, 83, 84 (Redline)
Public Attachment E	Proposed Edits to Natural Gas Pipeline Capacity and GHG Procurement Limits, BPP Sheets 75, 76, 80, 81, 83, 84 (Clean)
Public Attachment F	Proposed Edits to PG&E's RA Solicitation Schedule, Sheet 270 (Redline)
Public Attachment G	Proposed Edits to PG&E's RA Solicitation Schedule, Sheet 270 (Clean)
Public Attachment H	Declaration of Robert Gomez Seeking Confidential Treatment Pursuant to D.06-06-066 and Public Utilities Code §454.5(g).

**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 January 11, 2022, 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, 4<sup>th</sup> Floor  
San Francisco, California 94102

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

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

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

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

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

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

### **Effective Date**

PG&E requests that this Tier 1 advice letter become effective on December 22, 2021.

### **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.20-05-003. 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

Attachments

cc: Service List R.20-05-003



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6444-E

Tier Designation: 1

Subject of AL: Update to Pacific Gas and Electric Company's Bundled Procurement Plan – Greenhouse Gas and Natural Gas Pipeline Capacity Procurement Limits and Resource Adequacy Solicitation Schedule

Keywords (choose from CPUC listing): Compliance, Procurement

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

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

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 Attachment H

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: Robert Gomez, (415)973-8681

Resolution required?  Yes  No

Requested effective date: 12/22/21

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss in AL if more space is needed.

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

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

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

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

**PACIFIC GAS AND ELECTRIC COMPANY**

**Attachment A**

**Proposed Edits to Natural Gas Pipeline  
Capacity and GHG Procurement Limits, BPP  
Sheets 75, 76, 80, 81, 83, 84 (Redline)**

**(Confidential)**

**PACIFIC GAS AND ELECTRIC COMPANY**

**Attachment B**

**Proposed Edits to Natural Gas Pipeline  
Capacity and GHG Procurement Limits, BPP  
Sheets 75, 76, 80, 81, 83, 84 (Clean)**

**(Confidential)**

# **PACIFIC GAS AND ELECTRIC COMPANY**

## **Attachment C**

### **Confidential Workpapers – GHG Procurement Limits**

**(Confidential)**

**PACIFIC GAS AND ELECTRIC COMPANY**

**Attachment D**

**Proposed Edits to Natural Gas Pipeline  
Capacity and GHG Procurement Limits, BPP  
Sheets 75, 76, 80, 81, 83, 84 (Redline)**

**(Public)**



**TABLE C-9**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**NATURAL GAS PIPELINE CAPACITY PROCUREMENT LIMITS**  
**CONFIDENTIAL**

Line No.	Limit	Description
1	Volume Limit	Peak annual demand for each generator in portfolio
2	Term Limit	Up to ten years, subject to BPP-approval requirements.



**TABLE C-10**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**NATURAL GAS PIPELINE CAPACITY PROCUREMENT LIMITS**  
**CONFIDENTIAL**

Line No.	Year	MMBtu/d
1	<del>2015</del> 2022	
2	<del>2016</del> 2023	
3	<del>2017</del> 2024	
4	<del>2018</del> 2025	
5	<del>2019</del> 2026	
6	<del>2020</del> 2027	
7	<del>2021</del> 2028	
8	<del>2022</del> 2029	
9	<del>2023</del> 2030	
10	<del>2024</del> 2031	

### 3. Natural Gas Storage Procurement Limits

To reliably meet PG&E’s Electric Portfolio demand, PG&E may procure natural gas storage services. PG&E is authorized to procure storage up to the following limits:

- a) Withdrawal Limit – Withdrawal equal to the largest difference between the maximum daily portfolio demand forecast and the expected demand forecast for each month throughout the year.
- b) Injection Limit – Injection equal to the largest difference between minimum daily forecast demand and expected daily demand for each month throughout the year.
- c) Limit calculations are based on PG&E’s monthly gas burn forecast, assuming economic dispatch under an implied market heat rate that is two standard deviations higher than the base case.
- d) Storage Inventory Capacity Limit – Calculated to secure enough inventory for █ days of withdrawal as calculated above (i.e., █ times the Storage Withdrawal Limit).



obligated to purchase for a third party, calculated using an IMHR that is two-standard deviations above the expected IMHR.<sup>11</sup>

If this equation results in a negative number in a given year, PG&E's Direct Compliance Obligation Purchase Limit for that year should be set at zero.

In addition to its Direct Compliance Obligation Purchase Limit, in the current year PG&E will not purchase GHG Products for future years greater than the percentage allowed in the Direct Compliance Obligation Purchase Limit formula. Therefore, for the prompt year (current year plus one) PG&E will not purchase in aggregate during the current year more than 60 percent of the prompt year's forecasted compliance obligation (as calculated above). Similarly, the percentages for current year plus two and current year plus three are 40 percent and 20 percent, respectively.

Consistent with Ordering Paragraph 9 of D.12-04-046, Table C-16 details estimated forecast of the amount of GHG compliance instruments (in metric tons carbon dioxide equivalents) that correspond to the maximum procurement levels applicable to the 2022+ periods detailed in Table C-14.

<sup>11</sup> The IMHR two-standard deviations above the expected IMHR is calculated as follows: (1) the monthly historic IMHR is calculated by dividing monthly forward electricity prices by monthly forward gas prices for the period 2003 through 2011, yielding the forward monthly IMHR for this period; (2) monthly standard deviations of the forward monthly IMHR are then calculated separately for January through December; (3) the IMHR two-standard deviations above the expected IMHR is equal to the forward IMHR plus the standard deviation calculated in (2) multiplied by 2.0. The forward electricity prices to be used in calculating forecasted compliance obligations for the Direct Compliance Obligation Purchase Limits are then calculated by multiplying the IMHR at two-standard deviations above the expected IMHR by the forward gas price.



**TABLE C-13**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**COMPLIANCE INSTRUMENT FORECAST FOR 2022<sup>1</sup> THROUGH 2025<sup>4</sup>**  
**MILLION MTCO<sub>2</sub>E**  
**CONFIDENTIAL**

Line No.	Year	Base Case	Two Standard Deviation High IMHR Case
1	2022 <sup>1</sup>		
2	2023 <sup>2</sup>		
3	2024 <sup>3</sup>		
4	2025 <sup>4</sup>		

**TABLE C-14**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**DIRECT COMPLIANCE OBLIGATION PURCHASE LIMIT FOR 2022<sup>0</sup>**  
**MILLION MTCO<sub>2</sub>E**  
**CONFIDENTIAL**

Line No.	Limit <sup>12</sup>	Limit for 2022 <sup>1</sup>
A		
1		
2		
3		
4		
A+1+2+3+4		

<sup>12</sup>

[Redacted footnote text]



as a result of its direct compliance obligation as “direct compliance obligation” is defined above.

“B” is PG&E’s net purchases of GHG Products to date for hedging purposes, calculated as the total purchases of GHG Products for purposes of hedging PG&E’s financial exposure up to the current year, minus those GHG Products sold up to the current year. This term helps ensure that if PG&E hedged considerably in prior years and those hedges did not pay out (i.e., the price PG&E saw in the market for GHG Products stayed below what PG&E paid for a GHG Product and so PG&E did not sell the instrument), that gets factored into the amount of additional hedging PG&E is allowed to undertake.

If this equation results in a negative number in a given year, PG&E’s Financial Exposure Purchase Limit for that year will be set at zero.

Consistent with Ordering Paragraph 9 of D.12-04-046, Table C-15 details estimated forecast of PG&E’s financial exposure to GHG costs that will, or are anticipated to be, embedded in the price of energy (in metric tons carbon dioxide equivalents) that correspond to the maximum procurement levels applicable to both the 2021~~0~~ and 2022~~1~~ periods detailed in Table C-16 for the CPUC Approved Scenario.



**TABLE C-15**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**INDIRECT COMPLIANCE INSTRUMENT FORECAST FOR 2022~~1~~ THROUGH 2025~~4~~**  
**CPUC APPROVED SCENARIO**  
**MILLION MT CO<sub>2</sub>E**

Line No.	Year	Financial Exposure <sup>13</sup>
1	2022 <del>1</del>	
2	2023 <del>2</del>	
3	2024 <del>3</del>	
4	2025 <del>4</del>	

**TABLE C-16**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**FINANCIAL EXPOSURE PURCHASE LIMITS FOR 2021~~0~~ AND 2022~~1~~**  
**CPUC APPROVED SCENARIO**  
**MILLION MT CO<sub>2</sub>E**

Line No.	Limit <sup>14</sup>	Limit for 2021 <del>0</del>	Limit for 2022 <del>1</del>
1			
2			
3			
4			
B			
1+2+3+4-B			

13 [REDACTED]

14 [REDACTED]

**PACIFIC GAS AND ELECTRIC COMPANY**

**Attachment E**

**Proposed Edits to Natural Gas Pipeline  
Capacity and GHG Procurement Limits, BPP  
Sheets 75, 76, 80, 81, 83, 84 (Clean)**

**(Public)**



**TABLE C-9**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**NATURAL GAS PIPELINE CAPACITY PROCUREMENT LIMITS**

Line No.	Limit	Description
1	Volume Limit	Peak annual demand for each generator in portfolio
2	Term Limit	Up to ten years, subject to BPP-approval requirements.



**TABLE C-10**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**NATURAL GAS PIPELINE CAPACITY PROCUREMENT LIMITS**  
**CONFIDENTIAL**

Line No.	Year	MMBtu/d
1	2022	
2	2023	
3	2024	
4	2025	
5	2026	
6	2027	
7	2028	
8	2029	
9	2030	
10	2031	

**3. Natural Gas Storage Procurement Limits**

To reliably meet PG&E’s Electric Portfolio demand, PG&E may procure natural gas storage services. PG&E is authorized to procure storage up to the following limits:

- a) Withdrawal Limit – Withdrawal equal to the largest difference between the maximum daily portfolio demand forecast and the expected demand forecast for each month throughout the year.
- b) Injection Limit – Injection equal to the largest difference between minimum daily forecast demand and expected daily demand for each month throughout the year.
- c) Limit calculations are based on PG&E’s monthly gas burn forecast, assuming economic dispatch under an implied market heat rate that is two standard deviations higher than the base case.
- d) Storage Inventory Capacity Limit – Calculated to secure enough inventory for █ days of withdrawal as calculated above (i.e., █ times the Storage Withdrawal Limit).



obligated to purchase for a third party, calculated using an IMHR that is two-standard deviations above the expected IMHR.<sup>11</sup>

If this equation results in a negative number in a given year, PG&E's Direct Compliance Obligation Purchase Limit for that year should be set at zero.

In addition to its Direct Compliance Obligation Purchase Limit, in the current year PG&E will not purchase GHG Products for future years greater than the percentage allowed in the Direct Compliance Obligation Purchase Limit formula. Therefore, for the prompt year (current year plus one) PG&E will not purchase in aggregate during the current year more than 60 percent of the prompt year's forecasted compliance obligation (as calculated above). Similarly, the percentages for current year plus two and current year plus three are 40 percent and 20 percent, respectively.

Consistent with Ordering Paragraph 9 of D.12-04-046, Table C-16 details estimated forecast of the amount of GHG compliance instruments (in metric tons carbon dioxide equivalents) that correspond to the maximum procurement levels applicable to the 2022 periods detailed in Table C-14.

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<sup>11</sup> The IMHR two-standard deviations above the expected IMHR is calculated as follows: (1) the monthly historic IMHR is calculated by dividing monthly forward electricity prices by monthly forward gas prices for the period 2003 through 2011, yielding the forward monthly IMHR for this period; (2) monthly standard deviations of the forward monthly IMHR are then calculated separately for January through December; (3) the IMHR two-standard deviations above the expected IMHR is equal to the forward IMHR plus the standard deviation calculated in (2) multiplied by 2.0. The forward electricity prices to be used in calculating forecasted compliance obligations for the Direct Compliance Obligation Purchase Limits are then calculated by multiplying the IMHR at two-standard deviations above the expected IMHR by the forward gas price.



**TABLE C-13**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**COMPLIANCE INSTRUMENT FORECAST FOR 2022 THROUGH 2025**  
**MILLION MTCO<sub>2</sub>E**  
**CONFIDENTIAL**

Line No.	Year	Base Case	Two Standard Deviation High IMHR Case
1	2022		
2	2023		
3	2024		
4	2025		

**TABLE C-14**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**DIRECT COMPLIANCE OBLIGATION PURCHASE LIMIT FOR 2022**  
**MILLION MTCO<sub>2</sub>E**  
**CONFIDENTIAL**

Line No.	Limit <sup>12</sup>	Limit for 2022
A		
1		
2		
3		
4		
A+1+2+3+4		

<sup>12</sup>

[Redacted footnote text]



as a result of its direct compliance obligation as “direct compliance obligation” is defined above.

“B” is PG&E’s net purchases of GHG Products to date for hedging purposes, calculated as the total purchases of GHG Products for purposes of hedging PG&E’s financial exposure up to the current year, minus those GHG Products sold up to the current year. This term helps ensure that if PG&E hedged considerably in prior years and those hedges did not pay out (i.e., the price PG&E saw in the market for GHG Products stayed below what PG&E paid for a GHG Product and so PG&E did not sell the instrument), that gets factored into the amount of additional hedging PG&E is allowed to undertake.

If this equation results in a negative number in a given year, PG&E’s Financial Exposure Purchase Limit for that year will be set at zero.

Consistent with Ordering Paragraph 9 of D.12-04-046, Table C-15 details estimated forecast of PG&E’s financial exposure to GHG costs that will, or are anticipated to be, embedded in the price of energy (in metric tons carbon dioxide equivalents) that correspond to the maximum procurement levels applicable to both the 2021 and 2022 periods detailed in Table C-16 for the CPUC Approved Scenario.



**TABLE C-15**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**INDIRECT COMPLIANCE INSTRUMENT FORECAST FOR 2022 THROUGH 2025**  
**CPUC APPROVED SCENARIO**  
**MILLION MT CO<sub>2</sub>E**

Line No.	Year	Financial Exposure <sup>13</sup>
1	2022	[REDACTED]
2	2023	[REDACTED]
3	2024	[REDACTED]
4	2025	[REDACTED]

**TABLE C-16**  
**PACIFIC GAS AND ELECTRIC COMPANY**  
**FINANCIAL EXPOSURE PURCHASE LIMITS FOR 2021 AND 2022**  
**CPUC APPROVED SCENARIO**  
**MILLION MT CO<sub>2</sub>E**

Line No.	Limit <sup>14</sup>	Limit for 2021	Limit for 2022
1	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]
B	[REDACTED]	[REDACTED]	[REDACTED]
1+2+3+4-B	[REDACTED]	[REDACTED]	[REDACTED]

<sup>13</sup> [REDACTED]

<sup>14</sup> [REDACTED]

**PACIFIC GAS AND ELECTRIC COMPANY**

**Attachment F**

**Proposed Edits to PG&E's RA Solicitation  
Schedule, Sheet 270 (Redline)**

**(Public)**



**PG&E's RA SOLICITATION SCHEDULE**

Solicitation <sup>5</sup>	Delivery Term <sup>6</sup>	Products	Anticipated Date
Q2 <del>4</del> through Balance of Year 2022 <del>0</del>	Monthly, through December 202 <del>1</del> <del>0</del>	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	<del>January</del> uly/August 202 <del>2</del> <del>0</del>
Q3 through Balance of Year 2022 Annual Multiyear (2021—2022)	Monthly, <del>January</del> through December (2021—2022)	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	<del>April</del> Q3 2022 <del>0</del> <sup>7</sup>
Q4 <del>February</del> through Balance of Year 2022 <del>3</del> <del>1</del>	Monthly, <del>February</del> through December 202 <del>2</del> <del>1</del>	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Right	<del>July/August</del> November 202 <del>2</del> <del>0</del>
Q2 through Balance of Year Annual (2023) <del>1</del>	Monthly, <del>January</del> through December 202 <del>3</del> <del>1</del>	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	<del>January</del> Q3 202 <del>2</del> <del>3</del> <del>1</del>
February Q3 through Balance of Year 2023 <del>1</del>	Monthly, <del>February</del> through December 202 <del>3</del> <del>1</del>	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	<del>November</del> April 202 <del>2</del> <del>1</del>
Q2 <del>4</del> through Balance of Year 2023 <del>1</del>	Monthly, through December 202 <del>3</del> <del>1</del>	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	<del>July/August</del> anuary 202 <del>1</del> <del>3</del>
Q3 through Balance of Year Annual (2023) <del>2</del>	Monthly, <del>January</del> through December (202 <del>3</del> <del>2</del> )	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	<del>April</del> Q3 202 <del>3</del> <del>1</del> <sup>8</sup>
Q4 <del>February</del> through Balance of Year 2023 <del>2</del>	Monthly, <del>February</del> through December 202 <del>3</del> <del>2</del>	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Right	<del>July/August</del> November 202 <del>3</del> <del>1</del>

<sup>5</sup> If PG&E does not have available products to sell, PG&E will not issue a solicitation.

<sup>6</sup> This table does not guarantee availability of product for the delivery period offered. Quantity is subject to meeting the requirements as described in this Appendix.



**PACIFIC GAS AND ELECTRIC COMPANY**

**Attachment G**

**Proposed Edits to PG&E's RA Solicitation  
Schedule, Sheet 270 (Clean)**

**(Public)**



**PG&E's RA SOLICITATION SCHEDULE**

Solicitation <sup>5</sup>	Delivery Term <sup>6</sup>	Products	Anticipated Date
Q2 through Balance of Year 2022	Monthly, through December 2022	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	January 2022
Q3 through Balance of Year 2022	Monthly, through December 2022	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	April 2022
Q4 through Balance of Year 2022	Monthly, through December 2022	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Right	July/August 2022
Annual (2023)	Monthly, January through December 2023	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	Q3 2022
February through Balance of Year 2023	Monthly, February through December 2023	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	November 2022
Q2 through Balance of Year 2023	Monthly, through December 2023	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	January 2023
Q3 through Balance of Year 2023	Monthly, through December 2023	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Rights	April 2023
Q4 through Balance of Year 2023	Monthly, through December 2023	System RA with/without Flexible RA Local RA with/without Flexible RA Import Capacity Counting Right	July/August 2023

<sup>5</sup> If PG&E does not have available products to sell, PG&E will not issue a solicitation.

<sup>6</sup> This table does not guarantee availability of product for the delivery period offered. Quantity is subject to meeting the requirements as described in this Appendix.

**PACIFIC GAS AND ELECTRIC COMPANY**

**Attachment H**

**Declaration of Robert Gomez Seeking  
Confidential Treatment Pursuant to D.06-06-  
066 and Public Utilities Code §454.5(g)**

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

**DECLARATION OF ROBERT GOMEZ  
SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION  
CONTAINED IN PG&E'S ADVICE LETTER 6444-E**

I, Robert Gomez, declare:

1. I am a Manager in the Portfolio Management group within Energy Policy and Procurement at Pacific Gas and Electric Company (PG&E) and am responsible for leading commercial greenhouse gas policy and strategy. In carrying out these responsibilities, I have acquired knowledge of the California Air Resources Board's Cap-and-Trade Regulation and other programmatic measures to establish a market-based price for GHG emissions in order to manage PG&E's compliance with Cap-and-Trade, which became effective on January 1, 2012. 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 procurement information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, 14-10-033, and relevant Commission rules, I make this declaration seeking confidential treatment for certain procurement data and information contained in Advice Letter 6444-E, which provides an update to PG&E's Greenhouse Gas ("GHG") and Natural Gas Pipeline Capacity Procurement Limits and Resource Adequacy Solicitation Schedule.

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 procurement data and information covered by Public Utilities Code Section 454.5(g), D.14-10-033, and General Order (GO) 66-D, Section 2.2b. 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 December 22, 2021 at San Francisco, California.

/s/

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Robert Gomez

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**  
**ADVICE LETTER 6444-E**  
**DECEMBER 22, 2021**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Statute or Order That Data Corresponds To	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
<b>Document:</b>			
Advice 6444-E, Attachment A	<i>D.14-10-033, Attachment A</i>  <i>Public Utilities Code</i> <i>§454.5(g)</i>  <i>General Order 66-D</i>	Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.	Indefinite
Advice 6444-E, Attachment B	<i>D.14-10-033, Attachment A</i>  <i>Public Utilities Code</i> <i>§454.5(g)</i>  <i>General Order 66-D</i>	Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.	Indefinite
Advice 6444-E, Attachment C	<i>D.14-10-033, Attachment A</i>  <i>Public Utilities Code</i> <i>§454.5(g)</i>  <i>General Order 66-D</i>	Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.	Indefinite
Advice 6444-E, Attachment A	<i>D.06-06-066, Appendix 1</i>  (Item I.A.4 Long-term fuel (gas) buying and hedging plans)  Pub. Util., Code § 454.5(g)	Information concerning a description of PG&E’s long term fuel (gas) buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage if publicly disclosed.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**  
**ADVICE LETTER 6444-E**  
**DECEMBER 22, 2021**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Statute or Order That Data Corresponds To</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time Data To Be Kept Confidential</b>
Advice 6444-E, Attachment B	D.06-06-066, <i>Appendix 1</i>  (Item I.A.4 Long-term fuel (gas) buying and hedging plans)  Pub. Util., Code § 454.5(g)	Information concerning a description of PG&E's long term fuel (gas) buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage if publicly disclosed.	Indefinite

**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  
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