

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6468E
As of June 15, 2022

Subject: Present Details of the Retained Resource Adequacy Capacity Rate for PG&E's Green Tariff Shared Renewables to Include the Retained Resource Adequacy Capacity as Authorized in Decision 19-10-001

Division Assigned: Energy

Date Filed: 01-18-2022

Date to Calendar: 01-21-2022

Authorizing Documents: D2112036

Disposition:	Accepted
Effective Date:	04-13-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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



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

January 18, 2021

Advice 6468-E

Pacific Gas and Electric Company (U 39 E)

Public Utilities Commission of the State of California

Subject: Present Details of the Retained Resource Adequacy Capacity Rate for PG&E's Green Tariff Shared Renewables to Include the Retained Resource Adequacy Capacity as Authorized in Decision 19-10-001

Purpose

Pursuant to Ordering Paragraph (OP) 14 in Decision (D.) 21-12-036 (Decision), Pacific Gas & Electric Company (PG&E) hereby submits this Tier 2 advice letter that presents an updated Green Tariff Shared Renewables (GTSR) resource adequacy (RA) rate calculation that includes RA charge based on the value that is retained for bundled compliance as authorized in Decision 19-10-001.

Background

Senate Bill 43 enacted the Green Tariff Shared Renewables (GTSR) program to be administered by the three large electrical utilities. D.15-01-051 authorized the implementation of Senate Bill 43, which included the implementation of both the Green Tariff program and the Enhanced Community Renewables program that aim to expand access to renewable energy resources to all customers. The GTSR program has a cap of 600 megawatts (MW) shared amongst the three large electrical utilities with PG&E's share capped at 272 MW.

D.15-01-051 also adopted programmatic ratemaking, including the utilization of existing rate structures, to calculate the GTSR rate. After D.15-01-051 was issued, the Commission modified aspects of the indifference amount calculation in D.19-10-001 as part of the Power Charge Indifference Adjustment ("PCIA") Order Instituting Rulemaking (R.) 17-06-026. Specifically, the calculation of the value of resource adequacy (RA) attributable to bundled customers was modified from a total PCIA-eligible portfolio evaluation to one that evaluated the amount of capacity that is explicitly retained for bundled compliance, which is relevant to and considered as input to the GTSR rate calculation.

On May 17, 2021, a collation of Community Choice Aggregators¹ (Joint CCAs) filed a Petition to Modify D.15-01-051 (Petition), that among other things requests that the Commission update the RA component of GTSR rate calculations to reflect recent Commission decisions concerning the indifference amount calculation utilized in the PCIA rates.

PG&E did not oppose the Petition's core request that D.15-01-051 be modified to provide greater specificity as to how GTSR rates are calculated, and to reflect D.19-10-001's framework concerning the value of RA retained for bundled customers compliance.²

The Decision discussion orders PG&E to confirm that these changes have been implemented in the 2022 ERRA Proceeding November Update and if not, requires PG&E shall submit a Tier 2 Advice Letter within 30 days with this Decision revising and detailing its GTSR rate calculations consistent with this Decision.³

PG&E's GTSR rate calculations were presented in PG&E's 2022 ERRA Forecast Testimony and the GTSR RA charge presented in PG&E's Opening Testimony and the ERRA November Update was calculated using the previously approved total portfolio calculation methodology.⁴ Subsequent to the 2022 ERRA November Update, PG&E filed Supplemental ERRA Forecast Testimony in December in response to two different Rulings by the ERRA Forecast's Administrative Law Judge. PG&E did provide an updated GTSR RA charge in four of the six scenarios that were submitted on December 14 and December 28, respectively.

Pursuant to the Decision discussion at page 8, and OP 14 in the Decision, PG&E appears to still be required to submit a Tier 2 advice letter within 30 days of the effective date of the Decision to revise its Green Tariff Shared Renewables rate calculations consistent to include the Retained Resource Adequacy capacity as authorized in Decision 19-10-001 and as proposed in the Petition for Modification of Decision 15-01-051 filed by the Joint CCAs. PG&E is also required to include all workpapers, calculations, and assumptions, etc., to support its calculations.⁵

¹ The Joint CCAs include Central Coast Community Energy (3CE), the City and County of San Francisco (CleanPowerSF), East Bay Community Energy (EBCE), Marin Clean Energy (MCE), Peninsula Clean Energy Authority (PCE), Pioneer Community Energy, San José Clean Energy (SJCE), Silicon Valley Clean Energy Authority (SVCE), Sonoma Clean Power (SCP), and Valley Clean Energy Alliance (Valley).

² PG&E's June 16, 2021 Response to the Joint CCAs Petition, p.3

³ D.21-12-036 at page 8.

⁴ PG&E did submit Supplemental ERRA Forecast Testimony on September 2, 2021, which did discuss the three Petitions to Modify D.15-01-051 that were pending resolution and but only had an illustrative calculation of the RA charge at that time.

⁵ D.21-12-036, OP 14.

Updated GTSR RA Charge

Even though PG&E's ERRA Forecast Testimony did include December Supplemental testimony that was filed after the issuance of the Decision and included the updated GTSR RA charge, it was not part of PG&E's ERRA November Update. Thus, PG&E in compliance with OP 14, PG&E is submitting an update GTSR RA charge through this Tier 2 Advice Letter.

The updated RA charge calculation results in a RA charge of 1.905 ¢/kWh, which is shown in the Table below. This is the same RA charge PG&E presented in Appendices C and D of its December 14 Supplemental ERRA Forecast Testimony, and in two scenarios PG&E submitted in its December 28, 2021, Supplemental ERRA Forecast Testimony.

TABLE 1
GTSR PROGRAM RESOURCE ADEQUACY CHARGE

Line No.	Description	
1	Bundled Billing Determinants (MWh)	27,971,673
2	Total RA Value Retained for Bundled Customers (\$1000s)	\$527,052.08
3 = 2/1	RA Value - Bundled Customers (\$/MWh)	\$18.84
4 = 3 * rf&u	RA Value with Revenue Factor & Uncollectible (\$/MWh)	\$19.05

The workpaper supporting the calculation results are included in Confidential Appendix A.

The overall GTSR rate results will be determined in the ERRA Forecast Proceeding and it is expected that one of the six scenarios submitted in the December 2021 supplemental testimonies will be selected. At present, PG&E is unsure which of the six ERRA Forecast rate scenarios the Commission will approve but it is expected to be one of the four scenarios that includes the updated GTSR RA charge.

Protests

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

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **February 7, 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, 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, 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).

VI. Effective Date:

PG&E requests that this Tier 2 advice letter submittal become effective upon Commission approval.

VII. Notice:

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for **A.12-01-008**, **A.12-04-020**, and **A.14-01-007**. 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/>.



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

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

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6468-E

Tier Designation: 2

Subject of AL: Present Details of the Retained Resource Adequacy Capacity Rate for PG&E's Green Tariff Shared Renewables to Include the Retained Resource Adequacy Capacity as Authorized in Decision 19-10-001

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.21-12-036

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

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

Confidential treatment requested? Yes No

If yes, specification of confidential information: See Confidential Declaration and Matrix
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Donna Barry, DLBf@pge.com, 415-973-5707.

Resolution required? Yes No

Requested effective date: No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

**PACIFIC GAS AND ELECTRIC COMPANY
ADVICE LETTER 6468-E**

**DECLARATION OF DONNA L. BARRY
SEEKING CONFIDENTIAL TREATMENT FOR CERTAIN DATA AND
INFORMATION CONTAINED IN WORKPAPER SUPPORTING
ADVICE LETTER 6468-E**

I, Donna Barry, declare:

1. I am a Principal Regulatory Analyst in the Electric Rates and Rate Architecture Department within the Regulatory Affairs organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include development of cost recovery proposals, analyses in support of testimony and various reports filed at the Commission. In carrying out these responsibilities, I have acquired knowledge of generation procurement purchased for PG&E's electric portfolio, utility-owned generation revenue requirements, and speciality program costs and rates, such as the Green Tariff Shared Renewables Program, which is the subject of this Advice Letter. 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 the Decisions 06-06-066, D.08-04-023, D.14-10-033, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in workpapers supporting Chapter 14 ("Green Tariff Shared Renewables") of the Prepared Testimony in support of PG&E's 2022 Energy Resource Recovery Account and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation Application.

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 D.06-06-066, D.08-04-023, D.14-10-033, 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 workpapers 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 January 18, 2022, at Pleasant Hill, California.

/s/

DONNA L. BARRY

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

**ADVICE LETTER 6468-E
JANUARY 18, 2022**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
Document: Appendix A			
All the workpaper tabs starting with prefix "CONF_"	Item VII.G (Bilateral Contract Terms and Conditions – Renewable Resource Contracts under RPS program)	These workpaper tabs reveal contract terms and conditions (i.e., detail pricing information) that are market sensitive information, which if publicly disclosed could put PG&E at a competitive disadvantage with regard to other market participants and could detrimentally impact PG&E customers. The data cannot be aggregated in a way that allows for partial disclosure.	Three Years

Appendix A

(Public)

2022 Forecast Adders				
		PG&E	SDG&E	SCE
Energy Index[1] (\$/MWh)	On Peak	\$72.96	\$71.72	\$71.72
	Off Peak	\$58.34	\$56.53	\$56.53
RA Adder (\$/kW-month)	System RA	\$6.03		
	Local RA	\$6.35	\$6.46	\$6.36
	Flexible RA	\$6.41		
RPS Adder (\$/MWh)	\$13.70			

Vintage Billing Determinants (MWh)	27,971,673
System Value (\$1000s)	
Local Value (\$1000s)	
Flex Value (\$1000)	
PCIA-eligible RA Value (\$1000s)	\$ 527,052.08
RA Value - Bundled Customers	18.84 \$/MWh
RA Value with RF&U	19.05 \$/MWh

Calculation of Retained RA Factor									
		System		Local		Flex		Total	
Vintage		NQC	Alloc Factor	NQC	Alloc Factor	NQC	Alloc Factor		
PCIA	UOG Legacy		80.22%		38.84%		29.13%		47.75%
PCIA	2009		11.79%		46.13%		70.87%		41.75%
PCIA	2010		3.45%		2.08%		0.00%		2.06%
PCIA	2011		1.65%		4.36%		0.00%		2.87%
PCIA	2012		1.19%		2.58%		0.00%		1.75%
PCIA	2013		1.37%		0.18%		0.00%		0.46%
PCIA	2014		0.09%		0.05%		0.00%		0.05%
PCIA	2015		0.10%		0.25%		0.00%		0.17%
PCIA	2016		0.02%		0.00%		0.00%		0.00%
PCIA	2017		0.01%		1.07%		0.00%		0.61%
PCIA	2018		0.00%		0.00%		0.00%		0.00%
PCIA	2019		0.00%		4.24%		0.00%		2.38%
PCIA	2020		0.00%		0.20%		0.00%		0.11%
PCIA	2021		0.10%		0.01%		0.00%		0.03%
MW-Month			100.00%		100.00%		100.00%		100.00%

**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