



**Sidney Bob Dietz II**  
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San Francisco, CA 94177

Fax: 415-973-3582

August 16, 2022

**Advice 6484-E-B**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Second Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q4, 2021)**

**Purpose**

Pacific Gas and Electric Company (“PG&E”) is submitting this supplemental advice letter to the California Public Utilities Commission (“Commission” or “CPUC”) related to its Procurement Transaction Quarterly Compliance Report (“QCR”) for record period October 1, 2021 to December 31, 2021, (Q4 2021) to include its Confidential Attachment F – Key Briefing Packages of Advice Letter 6484-E. Please note PG&E is submitting the entire Confidential Attachment F in its entirety.

**Background**

**Advice Letter 6484-E**

PG&E submitted its QCR for Q4-2021 on January 31, 2022 in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports be submitted within 30 days of the end of the quarter.

**Advice Letter 6484-E-A**

The Q4 2021QCR included 17 Carbon Free transactions PG&E executed in Q4 2021. The monthly allocation ratios for six of these transactions were to be determined in February 2022. The Supplemental Advice Letter filing updated the New Contracts Executed and Amended During the Quarter document in Confidential Attachment H to include these monthly allocation ratios.

**Attachment 1: Confidential Attachment H - CLEAN  
New Contracts Executed and Amended During the Quarter**

**Attachment 2: Confidential Attachment H - REDLINE  
New Contracts Executed and Amended During the Quarter**

**Advice Letter 6484-E-B**

This Supplemental Advice Letter filing includes Confidential Attachment F - Key Briefing Packages folder that was inadvertently omitted when PG&E filed its Q4 2021 QCR on January 31, 2022.

Attachment 1: Confidential Attachment F – Key Briefing Packages

**Protests**

PG&E asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 6484-E and not reopen the protest period.

**Effective Date**

Pursuant to General Order 96-B, Energy Industry Rule 5.1, this Tier 2 advice letter will become effective concurrent with original Advice Letter 6484-E, which is March 2, 2022. Advice Letter 6484-E was suspended for a period of up to 180 days therefore there is no need to extend the effective date. The effective date of Advice Letter 6484-E-B remains suspended until disposition by Energy Division.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the service list for Rulemaking (“R.”) 16-02-007. 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](mailto: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/

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Sidney Bob Dietz II  
Director, Regulatory Relations

**Attachments**

Attachment 1: Confidential Attachment F – Key Briefing Packages

Attachment 2: Confidentiality Declaration and Matrix

cc: Service List R.16-02-007 (Public Version)  
PG&E’s Procurement Review Group (Confidential Version)



# 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: 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) #: 6484-E-B

Tier Designation: 2

Subject of AL: Second Supplemental: Procurement Transaction Quarterly Compliance Submittal (Q4, 2021)

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 #: D.03-12-062 and D.02-10-062

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

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

Confidential treatment requested?  Yes  No

If yes, specification of confidential information: See Confidentiality Declarations 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: Jay Bukowski, Jay.Bukowski@pge.com

Resolution required?  Yes  No

Requested effective date: 3/2/22

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Clear Form

Advice 6484-E-B  
August 16, 2022

## **Attachment 1**

Confidential Attachment F - Key Briefing Packages

Advice 6484-E-B  
August 16, 2022

## **Attachment 2**

### Confidentiality Declaration and Matrix

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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6484-E-B**

**DECLARATION OF JAY BUKOWSKI  
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S  
CONFIDENTIAL ATTACHMENT F**

I, Jay Bukowski, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since October 1998. My current title is Manager within PG&E's Energy Policy and Procurement organization. In this position, my responsibilities include review of regulatory reports and managing PG&E's Procurement Review Group and Independent Evaluator program. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. 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 ("D.") 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's August 16, 2022 Advice Letter 6484-E-B, Confidential Attachment F.
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, 14-10-033, and/or Public Utilities Code Section 454.5(g). The matrix also specifies why



**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6484-E-B  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2021  
 AUGUST 16, 2022**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

Redaction Reference	D.14-10-033, GHG Confidential Information Matrix (As corrected by D. 15-01-024)	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
<b>Document: Quarterly Compliance Report</b>			
Confidential Attachment E, Q4 2021 GHG Materials folder:  File name: 06_PGE PRG PRES GHG Position Upd_121421.pdf, "Market Data Review, GHG Dispatch Curve", page 4	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite
Confidential Attachment F, Confid Attachment F Qtr04 2021 zip file:  File name: PGE PRG PRES GHG Position Update_121421.pdf, "Market Data Review, GHG Dispatch Curve", page 4  Confidential Attachment F, Confid Attachment F, PRG Meeting Materials and Summaries, December 14, 2021 folder:  File name: PGE PRG PRES GHG Position Update_121421.pdf, "Market Data Review, GHG Dispatch Curve", page 4	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite

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 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6484-E-B  
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 AUGUST 16, 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 Date To Be Kept Confidential
<b>Document: Quarterly Compliance Report</b>			
Attachment F –in its entirety: PRG Material	D.06-06-066 and Public Utilities Code Section 454.5(g)	<p>Presentations to the PRG include a variety of confidential commercially market sensitive information, including information about e-solicitation, bilateral contracts, pricing information, strategy discussions, recently issued RFO's, etc.</p> <p>Release of this commercially market sensitive information could impact market prices, cause harm to PG&amp;E's customers, and put PG&amp;E at an unfair business disadvantage by the disclosing this information. This information could be used by other market participants to gain a commercial advantage.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Length of Time for Specific Items identified in D.06-06-066 Matrix or Indefinite (for GHG information)
Attachment F –in its entirety: PRG Material-GHG Information	D.14-10-033	<p>Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	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.  
Braun Blasing Smith Wynne, P.C.  
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  
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  
McClintock IP  
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.

Resource Innovations

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  
Stoel Rives LLP

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