



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

May 10, 2022

Advice 6589-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Submittal of Community Choice Aggregator (CCA) Financial Security Requirements in Compliance With D.18-05-022

Pacific Gas and Electric Company (PG&E) hereby submits its calculation of the financial security requirements for the Community Choice Aggregators (CCAs) serving customers within its service territory.

Purpose

In compliance with Ordering Paragraph (OP) 8 of Decision (D.) 18-05-022, this advice submittal is to provide the California Public Utilities Commission (CPUC or Commission) with the calculated financial security requirements for Community Choice Aggregators serving customers within its service territory.

Background

On May 31, 2018, the Commission issued D.18-05-022 which established a methodology to derive incremental procurement costs for the financial security requirement and re-entry fees for an involuntary return of Community Choice Aggregation Service customers.

On August 6, 2018, PG&E submitted Advice 5350-E with its initial calculation of the FSR amount for each CCA serving customers in PG&E's service area. Advice 5350-E was approved by the Commission on September 14, 2018 with an effective date of September 13, 2018.

In Advice 5354-E submitted on August 15, 2018, PG&E requested approval to revise PG&E Electric Rule 23, *Community Choice Aggregation Service*, to incorporate the reentry fees and financial security requirements and calculation methodology into PG&E's Community Choice Aggregation Service tariffs. On September 4, 2018, the Alliance for Retail Energy Markets (AReM) submitted a protest to Advice 5354-E objecting that D.18-05-022 "does not involve direct access ("DA") customers or

suppliers” and identified four revisions which “have a, perhaps inadvertent effect on direct access that should be remedied....”¹ California Community Choice Association (CalCCA) also submitted a protest on September 4, 2018, raising a number of objections, including the “deletion of “certain provisions relating to the rights of DA-eligible customers (“DA Provisions”).”² On October 2, 2018, PG&E submitted Advice 5354-E-A to request further revisions to PG&E’s Electric Rule 23, *Community Choice Aggregation Service*, to resolve AReM and CalCCA’s Protest of Advice 5354-E.

On October 9, 2020, the Commission issued Resolution E-5059 which approved Advice 5354-E with modifications and the revisions to Electric Rule 23 submitted in Advice 5354-E-A. On November 6, 2020, PG&E submitted a Tier 1 advice letter, Advice 5354-E-B, to request further revisions to PG&E’s Electric Rule 23, *Community Choice Aggregation Service*, in compliance with Resolution E-5059. On November 24, 2020, PG&E received a disposition from the Commission approving Advice Letters 5354-E and 5354-E-A with an effective date of October 9, 2020. On January 15, 2021, PG&E withdrew Advice 5354-E-B and submitted Advice 6060-E to request further revisions to electric Rule 23 in compliance with Resolution E-5059. Advice 6060-E was approved by the Commission on February 24, 2021 with an effective date of February 15, 2021.

OP 8 of D.18-05-022 states:

The amount of the applicable financial security requirement is to be updated twice each year, with a 10% deadband, consistent with the method adopted for electric service providers in Decision 13-01-021.

Consistent with OP 6 of D.13-01-021, the investor-owned utilities are required to update the applicable financial security amounts by the 10th of May and November of each year and to submit them in a Tier 2 Advice Letter.

Attachment B contains a table showing, by CCA, the calculated financial security amount based upon the methodology adopted in D.18-05-022 and approved by the Commission in Advice 6060-E, and draft Resolution E-5170 issued by the Commission on October 28, 2021. The table has been redacted of any confidential CCA information. An unredacted version with the relevant supporting data and calculation of each respective CCA’s financial security amount is included in Confidential Attachment C. A declaration supporting confidential treatment is found in Attachment A. Concurrent with submitting this advice letter to the Energy Division, PG&E will serve by electronic means on each applicable CCA a copy of this advice letter, with the relevant supporting data, redacted of any proprietary information that is not the subject of a non-disclosure agreement or third-party proprietary information that can be acquired through a

¹ Alliance for Retail Energy Markets Protest Of Pacific Gas & Electric Advice Letter 5354-E, dated September 4, 2018, p. 1

² California Community Choice Association Protest Of Pacific Gas & Electric Advice Letter 5354-E, dated September 4, 2018, p. 6

subscription with the Intercontinental Exchange (ICE), and the calculation of each respective CCA's FSR amount provided confidentially only to that specific CCA.

Based upon draft Resolution E-5170, PG&E used the Resource Adequacy (RA) value from the CPUC's 2019 RA Report for Zone NP-26 but, as the RA value is not reflective of current RA market prices, urges the Commission to adopt the use of the updated RA Market Price Benchmarks (MPBs) in Rulemaking (R.) 21-03-011 (POLR OIR).

PG&E used the following data sources for the FSR calculation:

Input Element	Source	Value
Forecasted Energy Prices (Lines 3 - 8)	Intercontinental Exchange (ICE)	May 2022 – October 2022
Customer Re-Entry Fee (Line 15)	Electric Rate Schedule E-CCA	\$4.24 per account
Renewable Energy Credit (REC) Value (Line 21)	2021 PCIA MPB ³ (2022 Forecasted)	\$13.70/MWh
Local RA Volume-Weighted Average Price (Line 24)	2020 CPUC RA Report (Zone NP-26)	\$5.04/kW-mo.
System RA Volume-Weighted Average Price (Line 24)	2020 CPUC RA Report (Zone NP-26)	\$4.97/kW-mo.

The version of this advice letter posted at www.pge.com is redacted.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than May 31, 2022, which is 22 days⁴ after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

³ California Public Utilities Commission, "Calculation of the Market Price Benchmarks for the Power Charge Indifference Adjustment" dated November 1, 2021.

⁴ The 20-day protest period concludes on a weekend and holiday, therefore, PG&E is moving this date to the following business day.

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
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 and 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 2 advice letter become effective on regular notice, June 9, 2022, which is 30 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for R.21-03-011. 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

cc: Service List R.21-03-011

Attachments:

Public Attachment A – Declaration of David Gutierrez Supporting Confidential Treatment

Public Attachment B – Summary of CCA Financial Security Requirements (Redacted)

Confidential Attachment C - Summary of CCA Financial Security Requirements and Underlying Calculations



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) #: 6589-E

Tier Designation: 2

Subject of AL: Submittal of Community Choice Aggregator (CCA) Financial Security Requirements in Compliance With D.18-05-022

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other: Biannual

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-05-022

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 A

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: David Gutierrez, David.Gutierrez@pge.com

Resolution required? Yes No

Requested effective date: 6/9/22

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 proposed¹: N/A

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

¹Discuss 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

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 6589-E
May 10, 2022

Attachment A

**Declaration of David Gutierrez Supporting Confidential
Treatment**

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, David Gutierrez, am a Senior Manager in Community Vitality for Pacific Gas and Electric Company (“PG&E”), a California corporation. Aaron August, the Vice President, Business Development & Customer Engagement, of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
245 Market Street
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): R.03-10-003

3. Title and description of document(s): Advice Letter 6589-E, Submittal of Community Choice Aggregator (CCA) Financial Security Requirements in Compliance With D.18-05-022.

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the

basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data (Protected under PUC § 8380; Civ. Code §§ 1798 et seq.; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	<p>Attachments B and C: CCA Load Forecast On-Peak (MWh), Off-Peak (MWh), Monthly Peak Demand (MW), Forecast CCA Number of Service Accounts (SA) included in Calculations and Final Calculation Amounts. Confidential information is displayed in red font.</p>
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual (Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 (Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input checked="" type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data (Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)</p>	<p>Attachments B and C: ICE Average Off-Peak and On-Peak Forward Price Information included in Calculations and Final</p>

	Calculation Amounts. Confidential information is displayed in red font.
<input type="checkbox"/> Corporate financial records (Protected under Govt. Code §§ 6254(k), 6254.15)	
<input type="checkbox"/> Third-Party information subject to non-disclosure or confidentiality agreements or obligations (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036), ESP Service Agreement Form 79-948 Section 11	
<input type="checkbox"/> Other categories where disclosure would be against the public interest (Govt. Code § 6255(a))	
<hr/> <hr/> <hr/>	

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 10th day of May, 2022 at San Francisco, California.

/s/ David Gutierrez
 David Gutierrez
 Senior Manager, Community Vitality
 Pacific Gas and Electric Company

Attachment B

Summary of CCA Financial Security Requirements

(Redacted)

ATTACHMENT B
Summary of CCA Financial Security Requirements
Public Version

CCA FINANCIAL SECURITY REQUIREMENT	
Pacific Gas and Electric Company	
Advice 6589-E	
May 10, 2022	
Community Choice Aggregator	Total Financial Security
Central Coast Community Energy	
City of King City	
Clean Power SF	
East Bay Community Energy	
Marin Clean Energy	
Peninsula Clean Energy	
Pioneer Community Energy	
Redwood Coast Energy Authority	
San Jose Clean Energy	
Silicon Valley Clean Energy	
Sonoma Clean Power	
Valley Clean Energy	

Attachment C

Summary of CCA Financial Security Requirements and Underlying Calculations

(Confidential)

**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.
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
Uplight
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy