

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 6619E**  
**As of July 6, 2022**

Subject: Emergency Reliability Resource Adequacy Procurement for 2022 Demand Response  
Pursuant to Decision 21-12-015

Division Assigned: Energy

Date Filed: 06-16-2022

Date to Calendar: 06-22-2022

Authorizing Documents: D2112015

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>06-16-2022</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:

Stuart Rubio  
(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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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)**

June 16, 2022

**Advice 6619-E**

Pacific Gas and Electric Company (U 39 E)

Public Utilities Commission of the State of California

**Subject: Emergency Reliability Resource Adequacy Procurement for 2022 Demand Response Pursuant to Decision 21-12-015**

**Purpose**

Pursuant to Decision (D.) 21-12-015 and the requirements set forth in Ordering Paragraph (OP) 13, Pacific Gas & Electric Company (PG&E) submits this Tier 1 Advice Letter (AL) seeking the California Public Utilities Commission's (CPUC's) approval of one (1) Demand Response (DR) Resource Adequacy (RA) purchase agreement with Voltus, Inc. (Voltus) to provide RA for the month of September 2022.

This AL contains both confidential and public attachments as listed below. Consistent with GO 96-B, the confidentiality of information included in this AL is identified in the confidentiality declaration.

Attachment A: Contract with Voltus, Inc. (Confidential)  
Attachment B: Contract Valuation Information (Confidential)  
Attachment C-1: Independent Evaluator Report (Confidential)  
Attachment C-2: Independent Evaluator Report (Public)

**Background**

As a result of the summer 2020 rotating outages, an Assigned Commissioner's Ruling (ACR) was issued on December 28, 2020, that directed the large investor-owned utilities (IOUs) to immediately seek contracts for incremental capacity, available for peak and net peak in the summers of 2021 and 2022. On February 11, 2021, the Commission subsequently issued D.21-02-028 directing the IOUs to seek contracts for additional power capacity for summer 2021 reliability and to submit those contracts for consideration before the Commission via advice letters of various tiers, with the costs and benefits allocated to all benefitting customers through the Cost Allocation Mechanism (CAM).<sup>1</sup>

---

<sup>1</sup> D.21-02-028, p. 12

On March 25, 2021, the Commission approved D.21-03-056, which directed the IOUs to take actions to decrease peak and net peak demand and increase peak and net peak supply for the summers of 2021 and 2022.<sup>2</sup> The Decision requires that procured resources must be available to serve load at the peak and net peak, and directs the IOUs to give preference to storage contracts, upgrades resulting in increased efficiency of existing generation resources, and contract terms that are shorter in duration.<sup>3</sup>

D.21-03-056 authorizes the IOUs to continue their procurement efforts and endeavor to meet and exceed their respective incremental procurement targets to achieve an effective 17.5 percent planning reserve margin (PRM) for the months of May through October 2021 and 2022. Increasing the PRM from 15 percent to an effective 17.5 percent results in a minimum incremental procurement target of 450 megawatts (MW) for PG&E.<sup>4</sup> The Decision states that resource adequacy (RA) resources in excess of an IOU's 15 percent PRM should be charged to all benefiting customers in the IOU's service territory via the CAM, and authorizes the IOUs to acquire and pair imports with maximum import capability to be included in CAM procurement costs.<sup>5</sup>

On December 6, 2021, the Commission approved D.21-12-015 and instructed the IOUs to solicit additional resources for summers 2022 and 2023, including a new target range of 900 MW to 1,350 MW for PG&E for each of the June – October summer months of 2022 and 2023. This results in an effective PRM of 20 to 22.5 percent.<sup>6</sup> Resource types to be considered for procurement include RA-only contracts and incremental capacity from revised power purchase agreements.<sup>7</sup>

As part of the emergency procurement rulemaking, D.21-12-015 ordered the IOUs to seek DR RA Resources from third-party Demand Response Providers (DRPs) through a “bilateral” contracting process.<sup>8</sup> These resources would be “incremental to IOUs’ and all load serving entities’ (LSEs’) 15 percent PRM” and “would be comprised of new resources incremental to all existing DR resources already committed to any LSE.” Furthermore, the Decision called for a standardized payment/penalty requirement based on PG&E’s Capacity Bidding Program (CBP).<sup>9</sup> Any resulting contract would be submitted through a Tier 1 Advice Letter, consistent with the process ordered in this decision for other procurement.

---

<sup>2</sup> D.21-03-056, p. 2.

<sup>3</sup> D.21-03-056, p. 46.

<sup>4</sup> D.21-03-056, p. 43.

<sup>5</sup> D.21-03-056, p. 47.

<sup>6</sup> D. 21-12-015, OP 3.

<sup>7</sup> D. 21-12-015, p. 100-101.

<sup>8</sup> D. 21-12-015, OP 13, Attachment 1 at p. 3-4, COL 41, and FOF 112.

<sup>9</sup> PG&E’s CBP Tariff at Sheet 7. Link: [ELEC\\_SCHEDS\\_E-CBP.pdf \(pge.com\)](https://www.pge.com/electricity/energy_services/energy_products/energy_products_elec_scheds_e-cbp.pdf)

## **Discussion**

PG&E has executed a 5 MW contract with Voltus for the September 2022 RA month. The contract is for demand response leveraging the CAISO's Proxy Demand Resource (PDR) model and is RA eligible.

### **A. Solicitation Process**

PG&E issued a DR RA e-solicitation on May 10, 2022 to identified parties that were potentially capable and interested in participating.<sup>10</sup> The DR RA solicitation was undertaken in a manner similar to the ones utilized for near term procurement of supply resources. This process generally provides for a market notice to potential bidders, a shortlisting of viable bidders/offers with a lead up to contract execution.

### **B. Evaluation Framework**

D.21-12-015 states that "[t]he capacity price of the contracts will be established by the procurement process."<sup>11</sup> The offer price and related valuation assessment is included in Confidential Attachment B (Contract Valuation Information).

### **C. Contract Type**

The contract with Voltus is based on PG&E's long form RA contract that has historically been utilized for supply-side resources. This contract is a derivative of the industry standard Edison Electric Institute (EEI) Master Power Purchase and Sale Agreement (Confirmation).<sup>12</sup> Because PG&E anticipated that third-party DRPs would in most likelihood not have a pre-executed EEI Confirmation with PG&E, the long form RA contract was deemed to be a suitable stand-alone alternative. This contract incorporates performance standards required by D.21-12-015 along with those that are customary with demand response products.<sup>13</sup>

### **D. Procurement Review Group**

On May 11, 2022, PG&E notified the Procurement Review Group (PRG) and CAM PRG of the solicitation launch and of its revised offer form on May 17, 2022. On May 23, 2022, PG&E notified the PRG and CAM PRG of offers received through the solicitation, and on May 24, 2022, provided the PRG and CAM PRG of its proposed shortlist.

---

<sup>10</sup> Parties included CPUC registered third-party DRPs, CBP Aggregators and historic DRAM participants.

<sup>11</sup> D.21-12-015, Attachment 1, at p. 3-4.

<sup>12</sup> Version 2.1 (4/25/2000): [Master Contract HP | \(eei.org\)](http://www.eei.org)

<sup>13</sup> These include but are not limited to performance testing and restrictions on the use of Prohibited Resources.

### **E. Independent Evaluator**

PG&E utilized PA Consulting for the DR RA e-solicitation based on their use for similar RA type solicitations.

### **F. Cost Recovery**

PG&E is requesting that the costs associated with the Voltus contract be recovered through the New System Generation Balancing Account (NSGBA),<sup>14</sup> which is how other emergency procurement contracts are being recovered.<sup>15</sup> Because this contract would benefit all customers, not just bundled customers, the full cost would be allocated through CAM. This cost allocation treatment is consistent with D.21-03-056, OP 14 and D.21-12-015, COL 23.

### **Confidentiality**

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

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than July 6, 2022, which is 20 days after the date of this filing. 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:

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
E-mail: PGETariffs@pge.com

---

<sup>14</sup> Preliminary Statement FS: [ELEC\\_PRELIM\\_FS.pdf \(pge.com\)](#)

<sup>15</sup> PG&E's AL-6604-E is representative of the type of cost recovery utilized under the Emergency Procurement.

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 1 advice filing become effective upon date of filing, which is June 16, 2022.

**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.20-11-003. 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

cc: Service List R.20-11-003



# 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 (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) #: 6619-E

Tier Designation: 1

Subject of AL: Emergency Reliability Resource Adequacy Procurement for 2022 Demand Response Pursuant to Decision 21-12-015

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.21-12-015

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: Quinn Nakayama, quinn.nakayama@pge.com

Resolution required?  Yes  No

Requested effective date: 6/16/22

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: (415)973-2093  
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

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

**PACIFIC GAS AND ELECTRIC COMPANY  
RULEMAKING 20-11-003**

**DECLARATION OF QUINN NAKAYAMA SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION CONTAINED IN PG&E'S ADVICE  
LETTER FOR 2022 EMERGENCY DEMAND RESPONSE RESOURCE ADEQUACY  
PROCUREMENT PURSUANT TO DECISION 21-12-015**

I, Quinn Nakayama, declare:

1. I am a Director of Integrated Grid Planning and Innovation in the Energy Procurement and Policy Organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include oversight of activities and interactions with market participants related to third-party demand response resources. 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 and bid-related information.
2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain procurement and bid-related data and information contained in PG&E's Advice Letter for Emergency Demand Response Resource Adequacy Procurement Pursuant to Decision 21-12-015.
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 and bid-related data and information covered by D.06-06-066. 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 June 16, 2022 at San Francisco, California.

\_\_\_\_\_/s/  
Quinn Nakayama  
Director, Integrated Grid Planning and Innovation  
Pacific Gas and Electric Company

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

**ADVICE LETTER FOR EMERGENCY DEMAND RESPONSE RESOURCE ADEQUACY FOR SUMMER 2022  
UNDER DECISION 21-12-015**

June 16 , 2022

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To</b>	<b>PG&amp;E's Justification for Confidential Treatment</b>	<b>Length of Time</b>
<b>Confidential Appendices</b>			
Attachment A: Contract with Voltus, Inc. for Emergency Demand Response Resource Adequacy Agreement (Confidential)	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the executed Voltus, Inc. Emergency Demand Response Resource Adequacy Agreement presented in this appendix are generally confidential.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.
Attachment B: Contract Valuation Information Competitiveness (Confidential)	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the executed Voltus, Inc. Emergency Demand Response Resource Adequacy Agreement presented in this appendix are generally confidential.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.
Attachment C-1: Independent Evaluator (IE) Report – RA-Only Agreements (Confidential)	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS));  Item VIII. B) Specific quantitative analysis involved in scoring and evaluation of participating bids.	The IE Report contains discussion of the specific terms of the RA-Only agreements and discussions with counterparties.  The IE Report also contains information on PG&E's evaluation methodology and process, which constitutes the confidential results of offer evaluation.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.  Information under Item VIII. B is confidential

**PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

**ADVICE LETTER FOR EMERGENCY DEMAND RESPONSE RESOURCE ADEQUACY FOR SUMMER 2022  
UNDER DECISION 21-12-015**

June 16 , 2022

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To</b>	<b>PG&amp;E's Justification for Confidential Treatment</b>	<b>Length of Time</b>
			for three years from the date winning contracts are submitted for CPUC approval.

# **Attachment A**

Contract with Voltus, Inc.

(Confidential)

# **Attachment B**

Contract Valuation Information

(Confidential)

# **Attachment C-1**

Independent Evaluator Report

(Confidential)

# **Attachment C-2**

Independent Evaluator Report

(Public)



# PACIFIC GAS & ELECTRIC COMPANY

INDEPENDENT EVALUATOR MEMO  
DEMAND RESPONSE RESOURCE  
ADEQUACY SOLICITATION

**June 2022**

**Bringing Ingenuity to Life**  
paconsulting.com

**Denver Office**  
PA Consulting Group Inc.  
Suite 3550  
1700 Lincoln Street  
Denver  
CO 80203  
USA  
+1 720 566 9920  
**paconsulting.com**

**Prepared by: C. Janecek and L. Farih**  
**Reference: 7039**  
**Version: 1**

# Independent Evaluator Report

PA Consulting Group, Inc. (PA) served as the Independent Evaluator (IE) for the Pacific Gas & Electric Company (PG&E) Demand Response Resource Adequacy Electronic Solicitation (DR RA E-Solicitation or the Solicitation). This report provides a summary of PA's evaluation of the process from the drafting of the E-Solicitation documents through to the recommendation of selected bids and negotiations of contracts submitted to the California Public Utilities Commission (CPUC or Commission).

## Overview of Solicitation

In compliance with Ordering Paragraph (OP) 13 of CPUC Decision (D.) 21-12-015, PG&E issued its DR RA E-Solicitation.

In this E-Solicitation, PG&E sought offers for sale (i.e., **PG&E buys**) of eligible System RA with August through December 2022 and January through December 2023 delivery periods. PG&E did not specify the amounts of RA capacity it wished to purchase but did specify a minimum volume of 1 MW for the System RA product.

The Market Notice further noted that the product must meet both CPUC and CAISO requirements, including the Must-Offer Obligation (MOO) during the availability assessment hours from 4 p.m. to 9 p.m. Additionally, the Market Notice stated that the product must be a new Proxy Demand Resource (PDR) incremental to all resources committed to an existing Load Serving Entity (LSE) as consistent with OP 13 of D. 21-12-015. Lastly, PG&E noted in its Market Notice that it had preference for offers during the delivery periods of August through October 2022, and June through October 2023. Table 1 below summarizes the products sought in the E-Solicitation.

**Table 1. E-Solicitation Products**

Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
System RA	Buy	1 MW	Aug – Dec 2022, Jan – Dec 2023	Fixed Price \$/kW-month

PG&E received [REDACTED] to the E-Solicitation and contracted for 5 MW of RA purchases for September 2022. [REDACTED]

## PA's IE Report

PA's IE reports typically follow the CPUC's Solicitation Shortlist Report Templates. However, [REDACTED] this report is an abbreviated summary of the typical sections in an IE report.

## Main IE Activities During Solicitation

PA's role in PG&E's DR RA E-Solicitation spanned approximately two months from May to June 2022. PA performed the role of IE and was involved from PG&E's drafting of the Solicitation documents through to the execution of contracted capacity. PA ensured that the procedures followed by PG&E were aligned with the requirements in (D.) 21-12-015 and that interactions with all counterparties were fair and equitable. PA was in regular contact with PG&E staff throughout the process. The following provides a summary of PA's main activities during this solicitation:

- PA reviewed the E-Solicitation's Market Notice prior to PG&E's issuance and had no substantial comments or suggested edits to the Notice. PG&E has continually refined its development of a straightforward Market Notice template.
- PA received all communications between PG&E and bidders. PA directly received all the emails, including offers that were sent to and received from bidders.
- PA reviewed the offers received and negotiation emails with all bidders.
- PA reviewed the draft and executed confirmation documents related to the selected offers.
- PA participated in a conference call with the PG&E team and a counterparty. An additional conference call between the PG&E team and the counterparty occurred in which PA was not present. However, PA was invited to the call and the PG&E team provided notes from that call to PA.
- PA participated in a conference call with the PG&E team to discuss specific offers and PG&E's treatment of them, including shortlisting decisions.

## Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices to PG&E's DR RA E-Solicitation distribution list of approximately [REDACTED] email addresses. PG&E has conducted multiple RA and related solicitations in the last several years and has continually added to its E-Solicitation distribution list. PA notes that in each successive solicitation, PG&E occasionally sees new counterparties who have not participated in PG&E's solicitations before and believes that PG&E extended adequate outreach for the Demand Response Resource Adequacy Electronic Solicitation.

## PG&E's Offer Evaluation Methodology

PG&E primarily relied on a quantitative evaluation of each bidder's proposed volumes of RA desired and the bidders' proposed price for each product. [REDACTED]

PA found PG&E's bid/offer evaluation methodology appropriate for this Solicitation.

## PG&E's Shortlisting and Negotiations of Confirm

The Market Notice for this Solicitation specified that PG&E would contract for RA products under its long form RA Confirmation. In the Market Notice transmittal, PG&E provided participants with a term sheet and encouraged participants to submit redlines for the term sheet. During the confirm negotiations, PG&E provided draft Confirms to each participant specific to their awarded price and volume. Ultimately, PG&E contracted through this Solicitation with [REDACTED] for 5 MW of RA purchases for September 2022. This transaction utilized a modified EEI long form confirmation, which was adapted to support Demand Response.

## Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable Demand Response Resource Adequacy Electronic Solicitation.

PA's specific findings are noted below:

- PG&E in no way prevented PA from observing its process and analyzing its methods and did not interfere with PA's conducting the Independent Evaluation.
- PA finds that PG&E broadly engaged with the market for the Solicitation.
- Based on our review of PG&E's analysis, our participation in calls and meetings and other IE activities, PA finds that PG&E conducted the Demand Response Resource Adequacy Electronic Solicitation fairly.



## About PA.

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

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

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

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

**PA. Bringing Ingenuity to Life.**

---

Discover more at [paconsulting.com](https://paconsulting.com)

## Denver Office

PA Consulting Group Inc.  
Suite 3550  
1700 Lincoln Street  
Denver  
CO 80203  
USA  
+1 720 566 9920

## [paconsulting.com](https://paconsulting.com)

This report has been prepared by PA Consulting Group on the basis of information supplied by the client, third parties (if appropriate) and that which is available in the public domain. No representation or warranty is given as to the achievability or reasonableness of future projections or the assumptions underlying them, targets, valuations, opinions, prospects or returns, if any, which have not been independently verified. Except where otherwise indicated, the report speaks as at the date indicated within the report.

All rights reserved

© PA Knowledge Limited 2022

**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  
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