

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6621E
As of July 19, 2022

Subject: Implementing the 2020 Energy Resource Recovery Account (ERRA) Decision 22-04-041

Division Assigned: Energy

Date Filed: 06-17-2022

Date to Calendar: 06-24-2022

Authorizing Documents: D2204041

Disposition:	Accepted
Effective Date:	06-17-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

(415) 973-8794

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

June 17, 2022

Advice 6621-E

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

**Subject: **Implementing the 2020 Energy Resource Recovery Account (ERRA)
Decision 22-04-041****

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits its compliance advice letter pursuant to Ordering Paragraph (OP) 4 of Decision (D.) 22-04-041 (the "2020 ERRA Compliance Decision"). PG&E requests approval to implement the following from the 2020 Energy Resource Recovery Account (ERRA) Compliance Decision including the terms of the approved 2020 ERRA Settlement Agreement: 1. PG&E agrees to a disallowance of \$247,500 associated with CAISO penalties for load meter data errors (\$202,000), late submission of Resource Adequacy and Supply Plans (~\$2,000) and missed deadlines for grid modeling data or telemetry communication for PG&E's utility owned generation (~\$43,500); 2. PG&E agrees that any future CAISO sanctions for missed deadlines for grid modeling data or telemetry communication associated with its utility-owned generation should not be recovered from customers; 3. PG&E agrees to transfer from PABA to ERRA 2014 and 2017 DCSSBA recorded costs and will retain the entry of 2018 DCSSBA costs in the PABA; 4. PG&E agrees to adjust entries to the PABA for costs associated with the Green Tariff Shared Renewables (GTSR) program by approximately \$5 million for 2019 and 2020 and that approval of Advice Letter 6297-E will cause PCIA-related expenses associated with the GTSR program to be transferred from the PABA to the GTSRBA for the record year 2021 and beyond; and 5. PG&E will serve supplemental testimony in 2021 ERRA Compliance (A.22-02-015) to comply with the requirements of Ordering Paragraph 3 of D.22-04-041 to the extent its February 28, 2022 Prepared Testimony did not provide the required information.

Background

On April 27, 2022, the California Public Utilities Commission (Commission or CPUC) issued D.22-04-041 resolving Phase One of PG&E's 2020 ERRA Compliance Application (A.21-03-008). From the 2020 ERRA Settlement Agreement, the Commission authorized the following: 1. PG&E agrees to a disallowance of \$247,500 associated with CAISO

penalties for load meter data errors (\$202,000), late submission of Resource Adequacy and Supply Plans (~\$2,000) and missed deadlines for grid modeling data or telemetry communication for PG&E's utility owned generation (~\$43,500); 2. PG&E agrees that any future CAISO sanctions for missed deadlines for grid modeling data or telemetry communication associated with its utility-owned generation should not be recovered from customers; 3. PG&E agrees to transfer from PABA to ERRA 2014 and 2017 DCSSBA recorded costs and will retain the entry of 2018 DCSSBA costs in the PABA; 4. PG&E agrees to adjust entries to the PABA for costs associated with the Green Tariff Shared Renewables (GTSR) program by approximately \$5 million for 2019 and 2020 and approval of Advice Letter 6297-E will cause PCIA-related expenses associated with the GTSR program to be transferred from the PABA to the GTSRBA for the record year 2021 and beyond; 5.) PG&E will serve supplemental testimony in 2021 ERRA Compliance (A.22-02-015) to comply with the requirements of Ordering Paragraph 3 of D.22-04-041 to the extent its February 28, 2022 Prepared Testimony did not provide the required information.

Implementation of D.22-04-041 Decision including 2020 ERRA Compliance Settlement Requirements

PG&E confirms below that it has or will implement each of the D.22-04-041 requirements including the 2020 ERRA Compliance Settlement requirements:

1. PG&E agrees to a disallowance of \$247,500 associated with CAISO penalties for load meter data errors (\$202,000), late submission of Resource Adequacy and Supply Plans (~\$2,000) and missed deadlines for grid modeling data or telemetry communication for PG&E's utility owned generation (~\$43,500).
 - PG&E confirms that it has recorded a disallowance of \$247,500 associated with CAISO penalties for load meter data errors (\$202,000), late submission of Resource Adequacy and Supply Plans (~\$2,000) and missed deadlines for grid modeling data or telemetry communication for PG&E's utility owned generation (~\$43,500).
2. PG&E agrees that any future CAISO sanctions for missed deadlines for grid modeling data or telemetry communication associated with its utility-owned generation should not be recovered from customers.
 - PG&E confirms that it has documented through its Regulatory Accounting Document (RAD) process that any future CAISO sanctions for missed deadlines for grid modeling data or telemetry communication associated with its utility-owned generation should not be recovered from customers.
3. PG&E agrees to transfer from PABA to ERRA 2014 and 2017 DCSSBA recorded costs and will retain the entry of 2018 DCSSBA costs in the PABA.

- PG&E confirms that it has transferred from PABA to ERRA 2014 and 2017 DCSSBA recorded costs and will retain the entry of 2018 DCSSBA costs in the PABA.
4. PG&E agrees to adjust entries to the PABA for costs associated with the Green Tariff Shared Renewables (GTSR) program by approximately \$5 million for 2019 and 2020 and approval of Advice Letter 6297-E will cause PCIA-related expenses associated with the GTSR program to be transferred from the PABA to the GTSRBA for the record year 2021 and beyond.
- PG&E confirms that it has reduced entries to the PABA for costs associated with the Green Tariff Shared Renewables (GTSR) program by approximately \$5 million for 2019 and 2020 and that upon approval of Advice Letter 6297-E, PG&E has also begun to transfer PCIA-related expenses associated with the GTSR program from the PABA to the GTSRBA for the record year 2021 and beyond.
5. PG&E will serve supplemental testimony in 2021 ERRA Compliance (A.22-02-015) to comply with the requirements of Ordering Paragraph 3 of D.22-04-041 to the extent its February 28, 2022 Prepared Testimony did not provide the required information.
- PG&E confirms that it will serve supplemental testimony in 2021 ERRA Compliance (A.22-02-015) to comply with the requirements of Ordering Paragraph 3 of D.22-04-041 to the extent its February 28, 2022 Prepared Testimony did not provide the required information.

Implementation of requirements related to journal entries is further described below.

2020 ERRA Compliance – PABA and ERRA Disallowances

The following are the entries recorded in April 2022 based upon CPUC approval (D.22-04-041) of the 2020 ERRA Compliance Review Application to the Settlement Agreement (A.21-03-008) for the reversal in the disallowance of \$247,500 plus the related retroactive interest to PABA and ERRA. CAISO Penalties related to PABA are \$43,500 and to ERRA are \$204,000.

- To record the disallowance credit of certain CAISO penalties as provided in the 2020 ERRA Compliance Settlement to PABA for \$43,500 and ERRA for \$204,000

DR Electric Reserve Account (1823110) \$43,500
 CR PABA Balancing Account (1823252) (\$43,500)
 DR Electric Reserve Account (1823110) \$204,000
 CR ERRA Balancing Account (1823051) (\$204,000)

2020 ERRA Compliance – Transfer of 2014 & 2017 DCSSBA recorded costs from PABA to ERRA

The following are the entries recorded in April 2022 to transfer the (\$0.051M) which corrects DCSSBA recorded costs for 2014 and the \$4.688M DCSSBA recorded costs for 2017 from PABA to ERRA upon CPUC approval (D.22-04-041) of the 2020 ERRA Compliance Review Application to the Settlement Agreement (A.21-03-008).

- To record the transfer of 2014 & 2017 DCSSBA recorded costs from PABA to ERRA.

DR Electric Reserve Account (1823110) \$4.637M
CR PABA Balancing Account (1823252) (\$4.637M)
DR ERRA Balancing Account (1823051) \$4.637M
CR Electric Reserve Account (1823110) (\$4.637M)

Transfer of GTSR Solar Choice customer PCIA expenses from PABA to GTSRBA

The following are the entries recorded in December 2021 to transfer approximately \$5M for the 2019 and 2020 PCIA-related expenses associated with the GTSR program from PABA (rather than ERRA) to GTSRBA upon CPUC approval (D.22-04-041) of the 2020 ERRA Compliance Review Application to the Settlement Agreement (A.21-03-008).

The approximately \$5M prior period adjustment for 2019 and 2020 is a credit to PABA and debit to ERRA. There is no need for a prior period adjustment entry to the GTSRBA since this account has already received debit expenses for the PCIA; instead, the prior period adjustment appropriately reclasses the previously recorded credits from ERRA to PABA. In addition, the approval of Advice Letter (AL-6297-E) will cause PCIA-related expenses associated with the GTSR program to be transferred between PABA and GTSRBA (rather than between ERRA and GTSRBA) for the record period year 2021 and thereafter, which PG&E has begun the transfer of.

- To record a one-time prior period adjustment of approximately \$5M for the 2019 and 2020 PCIA-related expenses associated with the GTSR program. The approximately \$5M credit to PABA – which reflects transfer of PCIA program expenses to GTSRBA – offsets an approximately \$5M debit to ERRA that reflects reinstatement of previously credited expenses transferred from ERRA to GTSRBA during 2019 and 2020. 2019 PCIA-related expenses are \$2.059M and 2020 PCIA-related expenses are \$2.597M.

DR PABA Revenue – Electric (4000868) \$2.059M
CR PABA Balancing Account (1823252) (\$2.059M)
DR ERRA Balancing Account (1823051) \$2.059M
CR ERRA Revenue – Electric (4000907) (\$2.059M)

DR PABA Revenue – Electric (4000868) \$2.597M
CR PABA Balancing Account (1823252) (\$2.597M)
DR ERRA Balancing Account (1823051) \$2.597M
CR ERRA Revenue – Electric (4000907) (\$2.597M)

There are no tariff sheets submitted with this advice letter because no changes to PG&E's tariffs are required due to D.22-04-041.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than July 7, 2022, which is 20 days 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:

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 1 advice submittal become effective upon date of submittal, which is June 17, 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 A.21-03-008. 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



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: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 6621-E

Tier Designation: 1

Subject of AL: Implementing the 2020 Energy Resource Recovery Account (ERRA) Decision 22-04-041

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.22-04-041

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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:

Resolution required? Yes No

Requested effective date: 6/17/22

No. of tariff sheets: N/A

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: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
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

**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