

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6622E
As of July 15, 2022

Subject: California Public Utilities Code Section 8386.3(d) Vegetation Management Revenue Requirements

Division Assigned: Energy

Date Filed: 06-23-2022

Date to Calendar: 06-27-2022

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	06-23-2022

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 23, 2022

Advice 6622-E

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

**Subject: California Public Utilities Code Section 8386.3(d) Vegetation
Management Revenue Requirements**

Purpose

The purpose of this Advice Letter is to notify the California Public Utilities Commission (CPUC or Commission) that PG&E expects to incur costs exceeding its annual revenue requirement for its vegetation management activities, including its Enhanced Vegetation Management (EVM) Program¹ described in its 2022 Wildfire Mitigation Plan (WMP).

Background

The Legislature amended California Public Utilities Code Section 8386.3(d) through Senate Bill 247 in October 2019 to require an electrical corporation to notify the Commission by advice letter 30 days before the date when it projects that it will spend, or incur obligations to spend, its entire annual revenue requirement for vegetation management in its WMP.

Summary

The WMP does not authorize a revenue requirement for vegetation management activities. Vegetation management revenue requirements are authorized through PG&E's General Rate Case.² On December 3, 2020, the CPUC approved Decision (D).20-12-005 in PG&E's 2020 General Rate Case (GRC), approving a multi-party Settlement Agreement, with certain modifications, and adopting base revenue requirements for the

¹ EVM focuses on reducing the risk of trees and branches contacting power lines and equipment to help keep customers and communities safe. EVM is performed on all overhead distribution lines in Tier 2 and Tier 3 High-Fire Threat District Areas.

² Vegetation management activities associated with PG&E's Electric Transmission assets are subject to the jurisdiction of the Federal Energy Regulatory Commission and are not a component of the reporting in this advice letter.

2020-2022 GRC period.³ D.20-12-005 adopted an expense amount of \$663.1 million for both EVM and Routine Distribution Vegetation Management (Routine VM) for the year 2022.^{4 5} PG&E is authorized to recover 120% of the authorized amount in its revenue requirement.⁶ D.20-12-005 also required that expenses for PG&E's Tree Mortality vegetation management activities, historically recorded to the Catastrophic Event Memorandum Account (CEMA) be recorded to the Vegetation Management Balancing Account (VMBA).⁷ PG&E's vegetation management revenue requirement does not include an adopted amount for Tree Mortality VM activities as these activities were not forecast in the 2020 GRC.

PG&E estimates that its vegetation management expenses will exceed 120% of its authorized amount, or \$795.7 million, in June 2022.⁸

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than July 13, 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

³ Decision Authorizing PG&E's General Rate Case Revenue Requirement for 2020-2022, D. 20-12-005, OP 1, December 11, 2020.

⁴ See 2020 GRC SA Section 2.3.3 Table 3 for the adopted values.

⁵ The Routine Distribution VM Program is designed and implemented to ensure safe and reliable operation of distribution facilities and to prevent foreseeable vegetation outages. In addition, the Routine VM Program is designed to monitor compliance with state and federal laws and regulations including: CPUC General Order 95, Rule 35, Public Resource Codes §4292 and §4293.

⁶ D.20-12-005, p. 78, citing Settlement Agreement, Article 2.3.4.2.

⁷ On December 22, 2020, in accordance with D.20-12-005, PG&E filed Advice Letter 4344-G/6032-E, which included the following updates and revisions: Modified the VMBA (Electric Preliminary Statement BU) to become a two-way balancing account that records actual Routine and Enhanced Vegetation Management costs compared to amounts adopted in PG&E's GRC, and records costs for Tree Mortality and Fire Risk Reduction that were previously recovered through the Catastrophic Event Memorandum Account (CEMA).

⁸ Actual expenses up to 120% of the imputed adopted amount will be trued-up annually through the DRAM in the AET advice letter or through another Tier 2 advice letter as authorized by the Commission. PG&E is required to file an Application seeking review and approval of actual expenses incurred exceeding 120%. D.20-12-005, pp. 78, 91.

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

Pursuant to General Order (GO) 96-B, Rule 5.1, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is June 23, 2022.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically shown on the attached list and the parties on the service list for A.18-12-009. 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

Attachments

cc: Service List for A.18-12-009.



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) #: 6622-E

Tier Designation: 1

Subject of AL: California Public Utilities Code Section 8386.3(d) Vegetation Management Revenue Requirements

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 #:

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: 6/23/22

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	East Bay Community Energy Ellison Schneider & Harris LLP Engineers and Scientists of California	Pioneer Community Energy
Alta Power Group, LLC Anderson & Poole	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF International Power Technology	Public Advocates Office Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc. SCD Energy Solutions San Diego Gas & Electric Company
Atlas ReFuel BART		SPURR San Francisco Water Power and Sewer Sempra Utilities
Barkovich & Yap, Inc. Braun Blasing Smith Wynne, P.C. California Cotton Ginners & Growers Assn California Energy Commission	Intertie	Sierra Telephone Company, Inc. Southern California Edison Company Southern California Gas Company Spark Energy Sun Light & Power Sunshine Design Stoel Rives LLP
California Hub for Energy Efficiency Financing	Intestate Gas Services, Inc. Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	Modesto Irrigation District NLine Energy, Inc. NRG Solar	
Chevron Pipeline and Power City of Palo Alto	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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		