

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6625E
As of August 27, 2024

Subject: Revision to Electric Preliminary Statement Part GZ for Recovery of Costs Associated with the Partnership Pilot and Standard-Offer-Contract Pilot Pursuant to Decision 21-02-006

Division Assigned: Energy

Date Filed: 06-22-2022

Date to Calendar: 06-27-2022

Authorizing Documents: D2102006

Disposition:	Accepted
Effective Date:	06-22-2022

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 22, 2022

Advice 6625-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Revision to Electric Preliminary Statement Part GZ for Recovery of Costs Associated with the Partnership Pilot and Standard-Offer-Contract Pilot Pursuant to Decision 21-02-006

Purpose

As authorized by Decision (D.) 21-02-006, Pacific Gas and Electric Company (PG&E) submits this Tier 1 advice letter to update Electric Preliminary Statement Part GZ – *Distributed Energy Resources Distribution Deferral Account (DERDDA)*, to make minor clarifying modifications to track costs in connection with the Partnership Pilot and Standard-Offer-Contract Pilot.

Background

On October 2, 2014, the Commission instituted Rulemaking (R.) 14-10-003 (*Order Instituting Rulemaking to Create a Consistent Regulatory Framework for the Guidance, Planning and Evaluation of Integrated Distributed Energy Resources*), which sought to consider the development and adoption of a regulatory framework to provide policy consistency for the direction and review of demand-side resource programs. R.14-10-003 was also intended to consider how to best enable the utilities, other administrators, and electric market actors to offer a wide portfolio of demand modifying technologies best tailored to the specific characteristics of individual customers.

On February 11, 2021, the California Public Utilities Commission (Commission or CPUC) adopted its *Decision Adopting Pilots to Test Two Frameworks for Procuring Distributed Energy Resources that Avoid or Defer Utility Capital Investments* (D.21-02-006) as part of R.14-10-003. The description of the two frameworks are as follows:

- A five-year distributed energy resources distribution deferral tariff pilot that we call the Partnership Pilot because of its reliance on several partnerships; and
- A three-year Standard-Offer-Contract (SOC) Pilot for procuring distributed energy resources to defer distribution investments, with a contract based on the current Technology Neutral Pro Forma contract.

In accordance with D.21-02-006, PG&E will track marketing costs in the DERDDA and seek cost recovery in the GRC and will recover all Commission-approved revenue requirements equitably and transparently from both participating and non-participating customers.

All other costs, such as administrative costs and contingency costs, associated with the Partnership Pilot and Standard Offer Contract Pilot shall be recorded in the same manner as the costs for the Distribution Resources Plan (DRP) Distribution Investment Deferral Framework (DIDF) as outlined in D.16-12-036 (*Decision Addressing Competitive Solicitation Framework and Utility Regulatory Incentive Pilot*), D.18-02-004 (*Decision on Track 3 Policy Issues, Sub-Track 1 (Growth Scenarios) and Sub-Track 3 (Distribution Investment and Deferral Process)*) and the May 11, 2020 Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework—Filing and Process Requirements (Ruling). The May 11, 2020 Ruling allowed the IOUs to track contingency plan spending¹ in the DERDDA.²

Tariff Revisions

Electric Preliminary Statement Part GZ will be modified as follows:

- The Purpose Section will clarify that costs of the Partnership Pilot and Standard Offer Contract Pilot incurred pursuant to D.21-02-006 are included in DIDF projects that will be recorded and tracked in the DERRDA.
- The Distribution Investment Deferral Framework Administrative Cost Memorandum Sub-Account will be modified to indicate that the disposition of the balance in the account will be reviewed in the next General Rate Case, eliminating the requirement to submit a Tier 2 advice letter.
- The Accounting Procedures of the Distribution Investment Deferral Framework Administrative Cost Memorandum Sub-Account will be modified to clarify the addition of “contingency costs” to the administrative costs tracked in the subaccount.

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

¹ Ordering Paragraph 3 of Resolution E-4956 approved PG&E's contingency plan.

² See Item 51 of Attachment A of the May 11, 2020 Ruling.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than July 12, 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

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 22, 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 lists for R.14-10-003 and R.21-06-017. 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/>.



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) #: 6625-E

Tier Designation: 1

Subject of AL: Revision to Electric Preliminary Statement Part GZ for Recovery of Costs Associated with the Partnership Pilot and Standard-Offer-Contract Pilot Pursuant to Decision 21-02-006

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.21-02-006

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: 6/22/22

No. of tariff sheets: 5

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: See Attachment 1

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

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
53581-E	ELECTRIC PRELIMINARY STATEMENT PART GZ DISTRIBUTED ENERGY RESOURCES DISTRIBUTION DEFERRAL ACCOUNT Sheet 1	43656-E
53582-E	ELECTRIC PRELIMINARY STATEMENT PART GZ DISTRIBUTED ENERGY RESOURCES DISTRIBUTION DEFERRAL ACCOUNT Sheet 2	43657-E
53583-E	ELECTRIC PRELIMINARY STATEMENT PART GZ DISTRIBUTED ENERGY RESOURCES DISTRIBUTION DEFERRAL ACCOUNT Sheet 3	43658-E
53584-E	ELECTRIC TABLE OF CONTENTS Sheet 1	53575-E
53585-E	ELECTRIC TABLE OF CONTENTS Sheet 17	53577-E



ELECTRIC PRELIMINARY STATEMENT PART GZ Sheet 1
DISTRIBUTED ENERGY RESOURCES DISTRIBUTION DEFERRAL ACCOUNT

GZ. Distributed Energy Resources Distribution Deferral Account (DERDDA)

1. **PURPOSE:** The purpose of the DERDDA is to record and track actual costs incurred for (1) the Utility Regulatory Incentive Pilots program ("IDER Incentive Pilot") required to be implemented pursuant to CPUC Decision (D.)16-12-036 and (2) Distributed Resources Plan Distribution Investment Deferral Framework (DIDF) projects (including the Partnership Pilot and the Standard Offer Contract Pilot) pursuant to CPUC D.18-02-004 and D.21-02-006. D.18-02-004 allows PG&E to repurpose the existing Integrated Distributed Energy Resources Account (IDERA) to also record and track the costs associated with the DIDF projects. As a result, the account was renamed as Distributed Energy Resources Distribution Deferral Account. For the IDER Incentive Pilot, the amounts recorded in this account, include costs of annual contract payments to distributed energy resource providers, incremental administrative costs for the IDER Incentive Pilot, and the value of the four percent (4%) pre-tax incentive applied to the annual payments to distributed energy resource providers. For DIDF, the amounts recorded in this account include costs of annual contract payments and incremental administrative costs for the DIDF deferral projects. The DERDDA includes five sub-accounts to track each of these costs separately. (T)
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2. **APPLICABILITY:** The DERDDA applies to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balances in the various sub-accounts will be in the distribution component of rates through the Distribution Revenue Adjustment Mechanism (DRAM) as part of the PG&E's Annual Electric True-up (AET) advice filing.
4. **RATES:** The DERDDA does not have a rate component.
5. **ACCOUNTING PROCEDURE:** The DERDDA consists of the following subaccounts:

Integrated Distribution Energy Resources (IDER) Incentive Pilot:

The "Integrated Distribution Energy Resources Contract Payment Sub-Account" records and tracks the costs of payments to distributed energy resources providers associated with the IDER Incentive Pilot. These costs are pre-approved for recording and recovery in PG&E's next General Rate Case filing. The annual distributed energy resources provider payments, having been pre-approved, will be recovered over the lifespan of the contracts.

The "Integrated Distribution Energy Resources Administrative Cost Memorandum Sub-Account" records and tracks incremental administrative costs for the IDER Incentive Pilot. PG&E is required to file a Tier 3 advice filing providing a forecast of the expected administrative costs. The forecast costs approved in the advice filing are pre-approved for recording and recovery and will be reviewed by the Commission in PG&E's next GRC. Any administrative costs exceeding the forecast approved in the advice letter are subject to a reasonableness review. PG&E will provide a copy of the memorandum account recovery request in its next GRC to the Energy Division's IDER group.

The "Integrated Distribution Energy Resources Incentive Sub-Account" records and tracks the value of the four percent (4%) pre-tax incentive applied to the annual payments to distributed energy resource providers associated with the Incentive Pilot. The recorded incentives are subject to review by the Commission in an Energy Resource Recovery Account compliance application for each year in which an incentive is claimed.

(Continued)

<i>Advice</i>	6625-E	<i>Issued by</i>	<i>Submitted</i>	June 22, 2022
<i>Decision</i>	21-02-006	Meredith Allen	<i>Effective</i>	June 22, 2022
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



ELECTRIC PRELIMINARY STATEMENT PART GZ Sheet 2
DISTRIBUTED ENERGY RESOURCES DISTRIBUTION DEFERRAL ACCOUNT

5. ACCOUNTING PROCEDURE: (Cont'd.)

Distribution Investment Deferral Framework (DIDF) Projects:

The "Distribution Investment Deferral Framework Contract Payment Sub-Account" records and tracks the costs of payments to distributed energy resources providers for the Distribution Investment Deferral Framework projects. These costs are pre-approved for recording and recovery in PG&E's next General Rate Case filing. The annual distributed energy resources provider payments, having been pre-approved, will be recovered over the lifespan of the contracts.

The "Distribution Investment Deferral Framework Administrative Cost Memorandum Sub-Account" records and tracks incremental administrative costs for the Distribution Investment Deferral Framework projects. Disposition of the balance in this subaccount will be determined in the next General Rate Case or another proceeding as approved by the Commission.

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- a. Integrated Distribution Energy Resources Contract Payment Sub-Account: The following entries will be made to this subaccount at the end of each month, as applicable:
 - 1) A debit entry equal to the contract payment costs;
 - 2) A credit entry to transfer the balance to other accounts for recovery in rates, upon approval by the Commission; and
 - 3) A debit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry at a rate equal to the average interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
- b. Integrated Distribution Energy Resources Administrative Cost Memorandum Sub-Account: The following entries will be made to this subaccount at the end of each month, as applicable:
 - 1) A debit entry equal to the incremental administrative costs;
 - 2) A credit entry to transfer the balance to other accounts for recovery in rates, upon approval by the Commission; and
 - 3) A debit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry at a rate equal to the average interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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ELECTRIC PRELIMINARY STATEMENT PART GZ Sheet 3
DISTRIBUTED ENERGY RESOURCES DISTRIBUTION DEFERRAL ACCOUNT

5. ACCOUNTING PROCEDURE: (Cont'd.)

c. Integrated Distribution Energy Resources Incentive Sub-Account: The following entries will be made to this subaccount at the end of each month, as applicable:

- 1) A debit entry equal to 4 percent pre-tax of the annual payments for the distributed energy resources;
- 2) A credit entry to transfer the balance to other accounts for recovery in rates, upon approval by the Commission; and
- 3) A debit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry at a rate equal to the average interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

d. Distribution Investment Deferral Framework Contract Payment Sub-Account: The following entries will be made to this subaccount at the end of each month, as applicable:

- 1) A debit entry equal to the contract payment costs;
- 2) A credit entry to transfer the balance to other accounts for recovery in rates, upon approval by the Commission; and
- 3) A debit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry at a rate equal to the average interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

e. Distribution Investment Deferral Framework Administrative Cost Memorandum Sub-Account: The following entries will be made to this subaccount at the end of each month, as applicable:

- 1) A debit entry equal to the incremental administrative and contingency costs; (T)
- 2) A credit entry to transfer the balance to other accounts for recovery in rates, upon approval by the Commission; and
- 3) A debit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry at a rate equal to the average interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(Continued)

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		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



ELECTRIC TABLE OF CONTENTS

Sheet 17

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements (Cont'd)		
Part GA	Greenhouse Gas Expense Memorandum Account.....	32419,32420-E
Part GB	Greenhouse Gas Revenue Balancing Account.....	35256,40560-E
Part GD	Smart Grid Pilot Deployment Project Balancing Account.....	32540,32541, 32542-E
Part GE	Statewide Marketing, Education and Outreach Expenditure Balancing Account ..	49677,49678-E
Part GF	Customer Data Access Balancing Account – Electric.....	33136-E
Part GH	Mobile Home Park Balancing Account - Electric.....	47077,47078-E
Part GI	Energy Data Center Memorandum Account – Electric.....	33940-E
Part GJ	Major Emergency Balancing Account (MEBA).....	40563-E
Part GK	SmartMeter™ Opt-Out Program Balancing Account - Electric (SOPBA-E).....	35625,35626,35627-E
Part GL	Hydro Licensing Balancing Account (HLBA).....	40564-E
Part GM	Nuclear Regulatory Commission Rulemaking Balancing Account (NRCRBA)	40565-E
Part GN	San Francisco Incandescent Streetlight Replacement Account.....	34364-E
Part GO	Disconnection Memorandum Account - Electric (DMA-E).....	34604-E
Part GP	Green Tariff Shared Renewables Memorandum Account (GTSRMA).....	40566,40567, 40567-E
Part GQ	Energy Efficiency Financing Balancing Account – Electric (EEFMA-E) ..	53572, 53573, 53574-E
Part GR	Green Tariff Shared Renewables Balancing Account (GTSRBA).....	40569,40570,35377-E
Part GS	Residential Rate Reform Memorandum Account (RRRMA)	40571,40572-E
Part GT	Assembly Bill 802 Memorandum Account - Electric.....	40573-E
Part GU	Z-Factor Memorandum Account (ZFMA-E).....	40574-E
Part GV	Distribution Interconnection Memorandum Account (DIMA)	40575-E
Part GY	Electric Vehicle Program Balancing Account (EVPBA).....	40576-E
Part GZ	Distributed Energy Resources Distribution Deferral Account	53581,53582,53583-E
Part HA	Avoided Cost Calculator Memorandum Account.....	40000-E
Part HB	Distribution Resources Plan Demonstration Balancing Account.....	40577-E
Part HC	Rule 20A Balancing Account.....	41736-E
Part HD	Tax Memorandum Account (TMA-E).....	41088-E
Part HE	Executive Compensation Memorandum Account (ECMA-E).....	40699,40700-E
Part HF	Distribution Resources Plan Tools Memorandum Account (DRPTMA)	42139,42140-E
Part HG	Emergency Consumer Protections Memorandum Account - Electric (WCPMA-E).....	43007,52865,50549-E
Part HH	Transportation Electrification Balancing Account (TEBA).....	44688,44689,44690,44691, 42579,42580,42581,44692-E
Part HI	Solar On Multifamily Affordable Housing Balancing Account (SOMAHBA)	41781-E
Part HK	Diablo Canyon Retirement Balancing Account	42161, 43668-E
Part HL	Wildfire Expense Memorandum Account (WEMA-E)	42604, 42605-E
Part HM	Public Policy Charge Balancing Account (PPCBA)	52782,46124,46125,46126,52783,52784,52785,52786-E
Part HO	Statewide Energy Efficiency Balancing Account – E (SWEEBA-E)	47069,47070,47071-E
Part HQ	Fire Risk Mitigation Memorandum Account (FRMMA)	43314-E
Part HR	Net Energy Metering (NEM) Balancing Account (NEMBA)	43317-E
Part HS	Portfolio Allocation Balancing Account (PABA)	52787,52788,45744,46731,52790, 52791-E
Part HT	Officer Compensation Memorandum Account (OCMA-E).....	43629,43630-E
Part HU	San Joaquin Valley Disadvantaged Communities Pilot Balancing Account.....	44053-E
Part HX	Wildfire Plan Memorandum Account (WPMA)	44450-E

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Attachment 2

Redline Tariffs



ELECTRIC PRELIMINARY STATEMENT PART GZ Sheet 1
DISTRIBUTED ENERGY RESOURCES DISTRIBUTION DEFERRAL ACCOUNT

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The “Integrated Distribution Energy Resources Incentive Sub-Account” records and tracks the value of the four percent (4%) pre-tax incentive applied to the annual payments to distributed energy resource providers associated with the Incentive Pilot. The recorded incentives are subject to review by the Commission in an Energy Resource Recovery Account compliance application for each year in which an incentive is claimed.

(Continued)

<i>Advice</i>	5462-E	<i>Issued by</i>	<i>Submitted</i>	January 4, 2019
<i>Decision</i>	18-02-004	Robert S. Kenney	<i>Effective</i>	January 4, 2019
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



ELECTRIC PRELIMINARY STATEMENT PART GZ Sheet 2
DISTRIBUTED ENERGY RESOURCES DISTRIBUTION DEFERRAL ACCOUNT

5. ACCOUNTING PROCEDURE: (Cont'd.)

Distribution Investment Deferral Framework (DIDF) Projects:

The "Distribution Investment Deferral Framework Contract Payment Sub-Account" records and tracks the costs of payments to distributed energy resources providers for the Distribution Investment Deferral Framework projects. These costs are pre-approved for recording and recovery in PG&E's next General Rate Case filing. The annual distributed energy resources provider payments, having been pre-approved, will be recovered over the lifespan of the contracts.

The "Distribution Investment Deferral Framework Administrative Cost Memorandum Sub-Account" records and tracks incremental administrative costs for the Distribution Investment Deferral Framework projects. ~~Disposition of the balance in this subaccount will be determined in the next General Rate Case or another proceeding as approved by the Commission. PG&E is required to file a Tier 2 advice filing providing a forecast of the expected administrative costs. The forecast costs approved in the advice filing are pre-approved for recording and recovery and will be reviewed by the Commission in PG&E's next GRC. Any administrative costs exceeding the forecast approved in the advice letter are subject to a reasonableness review. PG&E will provide a copy of the memorandum account recovery request in its next GRC to the Energy Division's DRP group.~~

- a. Integrated Distribution Energy Resources Contract Payment Sub-Account: The following entries will be made to this subaccount at the end of each month, as applicable:
 - 1) A debit entry equal to the contract payment costs;
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- b. Integrated Distribution Energy Resources Administrative Cost Memorandum Sub-Account: The following entries will be made to this subaccount at the end of each month, as applicable:
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(Continued)

Advice	5462-E	Issued by	Submitted	January 4, 2019
Decision	18-02-004	Robert S. Kenney	Effective	January 4, 2019
		Vice President, Regulatory Affairs	Resolution	

**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